

Dear Sir/Madame,

I am writing to provide my feedback on the proposed standards and guidelines for poultry. I am submitting my feedback as a consumer and hobbyist poultry keeper.

I believe that industry is unable to conduct self-regulation in regards to animal welfare standards as there is too much pressure for ongoing cost reductions to ensure that industry acts with the best regards to animal welfare. My belief is that it is up to the Australian Government to provide welfare standards that protect the animals that we husband in our farming communities and it is the responsibility of the Government to ensure that all producers comply to the same standards providing adequate protection for the animals. This ensures that there is a minimum, level playing field for all producers that complies with the majority-based community standards. The desires of the community to ensure the welfare of poultry can be seen in the huge increase in “free range” eggs that are available on the grocery store shelves. At the moment there appear to be 4 main levels of eggs that are available: cage eggs, cage-free eggs, free range eggs and pasture raised eggs.

While I don't have the specific sales figures, I can extrapolate based on the number of alternative options to the cage eggs to suggest that the majority of the consumer community is interested in cage-free options. As such, I believe that the Government should take the opportunity of this Welfare Standards and Guidelines review to ensure a minimum welfare standard that requires an ongoing cage-free living environment for poultry.

I would suggest that in our community in Australia where the majority of people do not usually take an active part in feedback for these sorts of changes and updates to our animal husbandry standards, the community does tend to turn to and refer to organisations such as the RSPCA for guidance and recommendations when making their purchasing decisions.

Therefore, as a modern, first-world country, I believe that we should aim to achieve a minimum standard in regards to our poultry keeping and suggest that the RSPCA recommendation of a standard to be included in chapter B1 – Laying Chickens to ensure that battery cages for layer hens are phased out, and a standard included in Part A – 4 Facilities and Equipment, to prohibit housing any birds in conventional cages be adopted.

Furthermore I agree and support the following recommendations of the RSPCA as follows:

The inclusion of a standard in Chapter 8 – Litter management that ensures all poultry housed indoors must have access to a littered area to allow birds to forage and dustbathe.

The inclusion of a standard in chapter 4 – Facilities and equipment to ensure adequate perch space must be provided to all poultry with a motivation to perch.

The amending of standard SA6.3 in chapter 6 – Lighting to ensure that the minimum light intensities for all poultry be increased to at least 10 lux, and amending standard SA6.5 to require 8 hours of continuous darkness in each 24 hour period for all poultry.

That guideline GB1.6 become a standard in Chapter 4 – facilities and equipment to ensure that hens of all species must be provided with a nest.

That maximum stocking densities be decreased for all species, so that each individual bird has more room to move and express its normal behaviours.

That standards must be introduced to ensure that poultry are not forced to moult.

That stricter standards must be introduced around beak and bill-trimming to ensure that it is not performed unless necessary for animal welfare reasons, and it is performed appropriately, with minimal impacts on the birds.

I also **partially** support the RSPCA recommendation for more requirements in chapter 11 – poultry at slaughtering establishments to ensure welfare at abattoirs, and to prevent failures. This includes specifications for electrical waterbath and controlled atmosphere stunning systems, a requirement for CCTV cameras in all abattoirs, and designated animal welfare officers in all abattoirs. More requirements are also needed in chapter 10 – humane killing to include unacceptable methods. My qualification around this is that small, community-supported or co-operative abattoirs be taken into consideration in regards to the level of requirements in keeping with their size and number of animals processed on a weekly basis. For instance it is unreasonable to require that a small abattoir that does low volume, private kills are required to have a permanent, designated animal welfare officer.

Thanks and regards,
Graham Walker