

Submission by Sentient to the Proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry (Public consultation November 2017)

Sentient, Australia's independent veterinary animal welfare and ethics organisation, welcomes the opportunity to comment on the government's draft Australian Animal Welfare Standards and Guidelines for Poultry. This review is long overdue and since the initial standards and guidelines were produced, there have been significant advances in our scientific knowledge of the welfare needs of poultry. Likewise, we have seen huge shifts in public opinion about what is considered acceptable in terms of animal welfare. Supermarkets and other retailers have adapted to changing consumer values; the increasing demand for free range eggs is a prime example.

It is therefore both disappointing and alarming that this consultation process has not produced new standards that enshrine the basic welfare needs of poultry to express natural behaviours through access to perches, nest boxes, dustbathing and the outdoor range, to be protected from unnecessary and painful procedures (such as beak trimming or forced moulting) and to be kept at stocking densities compatible with a life worth living. We question why this consultation process does not include the option of an outright ban on conventional battery housing systems for laying hens, despite scientific literature and international trends (Hartcher and Jones, 2017). Sentient is fundamentally opposed to the housing of hens in conventional battery, and newer enriched, cage production systems. These systems pose inherent welfare adversities to all birds due to severe movement and behavioural restrictions, which far outweigh any advantages in hygiene or management that can be overcome by careful management in alternative systems. Furthermore, there is evidence that the chance of mortality outbreaks is no greater in alternative versus conventional cage systems (Freire and Cowling, 2003). We are equally concerned about the standards allowed for meat chickens, due to the intensive conditions of their housing and the ongoing genetic selection for birds with growth rates that cause lifelong pain and suffering.

We submit that these draft standards and guidelines will require substantial revision to reflect current findings from animal welfare science, to satisfy public opinion and, most importantly, to improve the welfare of millions of birds every year in Australia. Our specific recommendations follow below.

Principles for poultry welfare

P12 "In achieving improved welfare outcomes envisaged by the standards, it is important that people responsible for poultry have the necessary knowledge, experience and skills to undertake the various procedures and meet the requirements of the standards, in a manner that minimises the risk to poultry welfare".

In regards to knowledge, experience and skills, how is this measured and regulated?

Part A General standards and guidelines for all species of Poultry

1. Responsibilities

GA1.1



“Elements of responsibility for poultry management should include ... identifying distressed, weak, injured or diseased poultry, and taking appropriate action”.

Clarify what appropriate action is: immediate removal from the flock, immediate humane euthanasia, and/or immediate veterinary treatment.

GA1.2 “Owners, managers and stockpersons should have an appropriate staff induction program, periodically review existing practices, and be aware of new developments and training relevant to the welfare of poultry.”

What is considered appropriate? Will there be information provided on the basics that need to be included as a minimum requirement for the induction program?

GA1.4 “Documentary evidence of staff training and/or competence should be maintained.”

The word “should” implies that it is not necessary to be maintained. If it is not necessary, then how is it known that employees are undergoing the appropriate training?

2. Feed and water.

SA2.1 “A person in charge must ensure poultry have reasonable access to adequate and appropriate feed and water.”

Again, what is considered ‘adequate’ for poultry? Is this increased when energy demands are higher, ie., sick or laying poultry? Is there a minimum requirement for water quality? What is considered ‘reasonable’? Is there a minimum requirement for ml/kg/bird? Will this minimum requirement be altered according to the weather, ie., hot weather when maintenance requirement for water increases?

SA2.2 “A person in charge must ensure poultry, other than newly hatched poultry or where skip-a-day feeding is acceptable (for broiler breeders) have access to food at least once in each 24 hour period.”

Skip-a-day feeding should not be permissible. This equates to starvation and is inhumane. Broilers’ growth rates are such that they have a very high metabolic rate and high appetite. It is also not considered an acceptable industry practice for maintaining bird health or productivity.

SA2.7 “A person in charge must ensure feeding and watering systems are checked daily to ensure all poultry have access to feed and water.”

Daily is insufficient in warmer weather. Is there a cut-off (temperature-wise) that checking needs to be twice daily?

GA2.1 “Feed supply for poultry should minimise harmful metabolic and nutritional conditions ... “.

‘Minimise’ is far too subjective and is prone to abuse. Either change to ‘prevent’ or better define ‘minimise’.

GA2.2 “The interval of time from hatching to first feed and drink should be as short as possible.”

What is a reasonable time frame?



GA2.5 “Feeders should be cleaned and maintained regularly.”

The regularity of this needs to be defined.

GA2.7 “Unless being used to induce moulting major changes in diet should be introduced over an appropriate length of time and be closely monitored.”

Induced moulting should be banned because it denies birds access to food or water for significant periods of time in order to extend the laying cycle, yet birds require access to food at least every 12 hours and preferably ad libitum. In terms of other changes of diet, what length of time is considered ‘appropriate’? And how ‘sudden’ is too sudden regarding feed introduction and gastrointestinal symptoms?

3 Risk management of extreme weather, natural disasters, disease, injury and predation

SA3.4 “A person must ensure poultry which are unable to access feed and water are treated or killed as soon as possible.”

There should be a requirement of maximum stocking densities to prevent this situation where some birds are unable to access food and water. Without such a requirement, it appears that industry considers high stocking densities and the profits they bring can justify the disposal of a minority of birds who cannot compete for the basic requirements of feed and water. Furthermore, it is unlikely that persons in charge will be able to identify these birds in intensive systems due to the sheer number of birds, who will therefore suffer a slow death due to dehydration.

GA3.14 “Poultry should be vaccinated to protect against likely infectious diseases if there is a significant risk to the welfare of poultry.”

At what point is the risk ‘significant’? We submit that preventative measures such as vaccinations should be mandatory, especially in intensive systems, where high stocking densities promote the amplification of infectious agents.

GA3.17 “Feather pecking and cannibalism risk should be managed. Management methods, such as the below may be considered:

- infrared beak trim at day old
- providing foraging materials
- reducing stocking density”.

We oppose beak trimming. This is an invasive surgical procedure that would require anesthesia and long-term pain relief. Beak trimming is not an acceptable strategy to prevent feather pecking and cannibalism. This problem should be addressed by genetic selection and the provision of foraging materials and other forms of environmental stimulation such as dust baths, perches and outdoor access. Reducing stocking density should be listed first, as high stocking densities are the primary cause of cannibalism in birds. Lower stocking densities allow birds to move away from pecking animals, and they also reduce stress in general. Strategies to reduce feather pecking should also include rearing and transfer to the layer farm, litter quality and use, diet, range quality and use and flock health (Lambton et al, 2013).



GA3.18 “Poultry should be monitored for incidence of lameness, and the cause of lameness investigated and treated.”

Change to ‘must’. This should be a standard, not a guideline. Furthermore, the causes of lameness are often inherent to intensive production systems, such as the selective breeding of broilers for faster growth rates and high meat yield, which result limb disorders and lameness.

4 Facilities and equipment

SA4.2 “A person in charge must ensure all housing systems are designed to allow poultry to maintain a natural standing posture.”

This is an embarrassingly weak minimum compared to international standards. We should be following the lead of the EU and other nations by banning battery cage systems for layer hens and affording them the opportunity to express natural behaviours, which is a basic freedom essential for mental and physical well-being. Such behaviours include dustbathing in appropriate litter substrate, perching, foraging, exercising (including walking freely, jumping, flying and flapping their wings), exploring and engaging in comfort behaviors such as stretching and preening.

SA4.4 “A person in charge must ensure any slatted, wire or perforated floors are constructed to support the forward-facing toes, prevent entrapment and facilitate removal of manure.”

This is too vague. A timeframe needs to be set for the removal of manure. A person in charge could leave manure to accumulate for a year under the current reading.

GA4.5 “Provision of environmental enrichment should be considered, taking into account potential risks and benefits to poultry welfare.”

Environmental enrichment should be a compulsory standard, NOT a guideline. Again, this point demonstrates the unprogressive nature of these standards and guidelines, which are totally out of keeping with some international trends and current research in animal welfare science.

GA4.11 “If perches are provided they should be designed and fitted to reduce the risk of vent pecking.”

The provision of perches with adequate perch space should be essential, and therefore a standard, for all birds with the motivation to perch.

GA4.16 “If nest boxes are provided, they should be easily accessible and should not be so high above the floor level that poultry may be injured when ascending or descending.”

Nest boxes should be a requirement, and therefore, a standard.

GA4.18 “Access to the outdoors should meet the following requirements: • openings should be of a height to allow birds to pass through using normal posture • design and position of openings should avoid birds being able to obstruct the movement of other birds • position of openings should allow the outdoors to be visible to birds at ground level within the laying facility • the area around openings should be kept clean and well drained.”

All of the above should be compulsory. Furthermore, the following requirements are essential for ensuring that birds access free range areas:



- Access for a minimum of eight hours per day
- Shelter from predation and weather extremes via suitable fencing and the provision of wind breaks, shade and foliage (Gilani et al, 2014; Knierim, 2006)
- Regular rotation of the outdoor area to reduce parasite burden and maintain the attractiveness of the area to hens
- Regular exposure to outdoor enclosures in the rearing environment between 12 and 20 weeks of age (Grigor et al, 1995)
- Genetic selection of hens adapted to systems with outdoor ranges, which reduces feather pecking (Sorensen 2001)

5 Management of outdoor systems

SA5.2 “A person in charge must ensure poultry kept in housing with access to an outdoor area have ready access to the shed and shaded areas.”

Include specification that this also needs to be for protection from aerial predators.

6 Lighting

SA6.5 “A person in charge must ensure poultry except for meat chickens, emus, ostriches and quail are exposed to at least 4 hours of continuous darkness within a 24-hour period.”

This is inadequate. The practice of long photoperiod must be eliminated. Increasing light intensity reduces the range of behavior and the amount of time birds spend feeding.

Improvements can be made to their welfare by exposing them to a maximum of 16-17 hours of light per day. This standard should read that all birds are exposed to at least 8 hours of continuous darkness within a 24-hour period.

7 Temperature and ventilation

SA7.1 “A person in charge must ensure airflow and temperature in enclosed housing facilities minimises the risk to poultry welfare from heat, cold, humidity, dust or noxious gases.”

Furthermore, temperature levels must be checked at least three times daily under all conditions to avoid extremes and minimise the risk of heat stress.

SA7.3 “A person in charge must monitor ammonia levels and ensure immediate corrective action is taken if ammonia levels reach 20 ppm at bird level in sheds.”

This does not specify the frequency of monitoring. Ammonia levels must be checked daily.

GA7.3 “Temperature and poultry behaviour should be monitored more frequently at maximum stocking densities and during extreme weather conditions.”

This should be a standard.

GA7.4 “Corrective action should be taken immediately if signs of stress (sneezing, prolonged panting and wing extension due to heat or huddling due to cold) are observed.”

This should be a standard.



GA7.6 “Air quality parameters, such as temperature, humidity and ammonia levels, should be monitored and recorded on a daily basis. Poultry should be monitored for eye and nasal irritation that might indicate ammonia, dust or other air quality problems.”

This should be a standard (see above).

8 Litter management

GA8.1 “Where litter is re-used at the end of a batch, it should be treated to address pathogen loads and ammonia concentrations and be dry and friable at bird placement.”

Litter should never be re-used at the end of a batch.

GA8.2 “Where appropriate, poultry housed indoors should have access to a littered area, the litter occupying at least one third of the ground surface in order for birds to forage and dust-bathe. Litter should be at a depth suitable to the species.”

The provision of litter to allow birds to forage and dust-bathe should be compulsory, and therefore, a standard, not a guideline.

9 Handling and husbandry

SA9.3 “A person must free entrapped poultry at the first reasonable opportunity and if possible prevent this situation from recurring.”

It is unacceptable that animals should be trapped. Delete “if possible” as this situation should always be prevented from occurring. The current point contradicts points SA9.1 and SA9.2.

SA9.4 “A person in charge must ensure that induced moulting is not routinely practiced.”

Delete ‘routinely’. Induced moulting should never be practised because it denies birds access to food or water for significant periods of time in order to extend the laying cycle, yet birds require access to food at least every 12 hours and preferably ad libitum.

SA9.5 “A person in must ensure poultry are in adequate physical condition to endure an induced moult if necessary.”

Induced moulting must not be permitted.

SA9.10 “A person must only perform desnooding, dubbing, despurring and web marking on day old hatchlings selected as potential breeders.”

Furthermore, these must be treated as surgical procedures, performed under anesthesia by a veterinarian, with long term pain relief.

SA9.11 “A person must only perform toe trimming on day old hatchlings selected as potential breeders, except for emus and ostriches which may have toes trimmed on commercial stock up to 5 days of age.”

Furthermore, these must be treated as surgical procedures, performed under anesthesia by a veterinarian, with long term pain relief.

SA9.14 “A person must use appropriate tools and methods to trim the beaks of poultry.”

The beaks of poultry must not be routinely trimmed. This procedure should only occur under exceptional circumstances, for medical reasons, and must be performed under anesthesia by a veterinarian, with long term pain relief.



SA9.20 “A person in charge must ensure cull or surplus hatchlings awaiting disposal are treated humanely and are killed as soon as practicable.”

‘As soon as practicable’ is far too subjective. Change to ‘immediately’. Furthermore, industry should be researching and introducing techniques to identify the sex of chickens before they hatch, in order to prevent hatching and the currently used inhumane forms of culling (whether by grinding or suffocating).

GA9.1 “The stocking density should be reviewed regularly and adjusted, according to the age of the bird, flock size, house or paddock conditions, behavioural needs and the likely occurrence of disease.”

This should be a standard. Furthermore, maximum stocking densities should be specified that permit appropriate social interactions, including the ability for birds to escape bullying, and should allow sufficient individual space and unhindered access to food and water. This translates to a minimum of 5000cm² per bird, and may be achieved in larger housing systems with low stocking densities or more ideally, within smaller communities. Stocking densities must never exceed 1500 birds per hectare for free range systems and 24kg per square metres for barn systems.

GA9.5 “Poultry should be released by setting them down on their feet or from low heights that enable them to land normally, feet first. Avoid releasing in such a way that requires flying.”

Change ‘avoid’ to ‘do not’.

11 Poultry at slaughtering establishments

Shackling – electrical stunning systems:

Due to the unacceptable risk of birds suffering stress and injury during shackling and of avoiding the electrical stunning, these systems should be phased out in favour of controlled atmosphere killing, in line with US and European trends.

Part B Species standards and guidelines for poultry

B1 Laying chickens

Stocking densities – cage systems

We disagree with this entire section. Australia needs to get up to speed with international trends and ban battery cage systems. They have the worst welfare outcomes for laying hens. Both barren and enriched cages pose inherent welfare adversities to all birds due to the severe movement and behavioural restrictions, which affect 100% of the birds and far outweigh any advantages in hygiene or management.

Stocking densities – non-cage systems

SB1.8 “A person in charge must not exceed a stocking density of 30 kg/m² (measured as bird density in the useable area) for rearing laying pullets and for managing adult laying chickens.”

Change to 24 kg/m²



GB1.19 “The usable floor area of the veranda should provide sufficient space to allow at least one third of the flock to forage and dust-bathe at any one time.”

This is inadequate, as more than one third may wish to dust-bathe at any one time.

B3 – Meat and laying chicken breeders

SB3.10 “A person in charge must not exceed a stocking density of 30 kg/m² (measured as bird density in the useable area) for pullets and adult birds (including roosters).”

This is too high and should be changed to 24kg/m².

B4 Ducks

SB4.2 “A person must not routinely trim the bills of ducks.”

Remove the word ‘routinely’.

GB4.2 “Bill trimming should be carried out only when it is essential to reduce damage and suffering in flocks.”

This should only be performed under anesthesia by a veterinarian, and with long term pain relief, as this is an act of surgery.

With regards,

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