

Animal Welfare Standards Public Consultation
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Via email: publicconspoultry@animalhealthaustralia.com.au

25th February 2018

To Whom It May Concern,

Re: Australian Animal Welfare Standards and Guidelines (S&Gs) for Poultry

I am a veterinarian with over 25 years' experience in agriculture and animal welfare. I am shocked and dismayed that the most important issue affecting poultry welfare, that is caged systems, was not even included in the draft S&Gs. This reflects extremely poorly on both government and industry to omit such a critical aspect of poultry husbandry and welfare which is of significant concern to consumers and the community.

My first comment is that there must be a well-structured and industry supported phase out of cage systems as soon as possible and cage production systems must be prohibited for all poultry including both conventional and furnished cages for meat chickens and breeding stock.

The draft S&Gs refer to all innate behaviours of poultry as guidelines and not standards which allows the use of conventional cages to continue. This is unacceptable. No bird or animal used for production should be confined to the degree that they are unable to perform innate behaviours or exercise sufficiently. For overall health (psychological and physiological), poultry must be able to walk freely on an appropriate surface, stretch their wings, as well as perform innate behaviours such as dustbathing, foraging, perching and most importantly nesting. Conventional caged systems do not allow for any of these behaviours and furnished cages only permit limited expression of these behaviours.

The following information provides further details regarding the key issues causing negative welfare impacts on poultry which are not addressed adequately in the draft S&Gs.

Inability to exercise (walk freely and use perches)

Bone weakness results from severe restrictions on the opportunity to flap wings, walk, ground scratch and perch¹. Bone weakness increases the risk of fractures. It

¹ Laywel (2006) LayWel - Overall strengths and weaknesses of each defined housing system for laying hens, and detailing the overall welfare impact of each housing system.

has also been reported that cages used for housing broilers causes significant skin and leg conditions, as well as risk of fear and stress².

However, there is still behavioural restriction in furnished cages. Locomotion, wing-flapping, flying, dustbathing, ground-scratching, ground-pecking and foraging are limited, and not able to be performed satisfactorily.

Restriction to perform essential innate behaviours (nesting, dustbathing, perching, ground scratching etc)

The inability to perform strongly motivated innate behaviours can be detrimental leading to frustration, restlessness, aggression and fearfulness³.

Consumer and community expectations

There has been a relatively rapid and significant change in buying behaviour of consumers in relation to eggs. Over 50% of the eggs sold now are labelled as non-cage. Also, non-cage eggs account for a greater value in terms of market share than cage eggs. This change is reflective of Australians' concerns for animal welfare in conventional cages⁴. There are more and more companies shifting to using non-cage eggs due to high customer demand including companies such as [McDonalds](#), who are not only sourcing non-cage eggs but are promoting this fact widely. Other companies operating in Australia following suit include Subway, Hungry Jacks, Arnotts with the list growing.

International trends

Australia is being left behind on this issue. Many countries have prohibited the use of conventional caged systems or are moving towards this. The EU banned all conventional cages from 2012 with furnished cages permitted. Sweden banned conventional cages in 2002. Conventional cages will be prohibited from 2022 in NZ. Canada will phase out conventional cages by 2036 with a 50% reduction by 2025. In the US, some states are also phasing out conventional cages. Further, major global companies such as [Nestle](#), are also committing to switching to non-cage eggs.

² Shields, S & Greger, M (2013) Animal Welfare and Food Safety Aspects of Confining Broiler Chickens to Cages. *Animals* 3:386-400.

³ Nichol CJ et al. (2017) Farmed Bird Welfare Science Review. Department of Economic Development, Jobs, Transport and Resources. 1-321.

⁴ IBISWorld (2015) Egg farming in Australia. IBISWorld Industry Report A0172.

Husbandry procedures

Induced moulting is undertaken to increase productivity and profits but is done by compromising bird welfare. Therefore this must be prohibited. Further, beak/bill trimming can cause considerable pain, both acute and chronic, and must only be done to resolve a welfare issue.

On-farm killing of spent layer hens

This is a significant welfare issue and only accredited and monitored operators using appropriate equipment and methods known to not cause pain or distress. This is not currently happening where it is known that over 75% of spent layer hens are being killed on-farm and there is currently no independent oversight or mandatory requirements for this. This is an urgent and significant welfare issue that must be addressed in the S&Gs.

Recommendations

The following recommendations are made to phase out conventional cages, prevent cages systems to be used in the future and husbandry improvements to enhance the lives of poultry used for food production.

1. Chapter B1 – Laying Chickens

Add a Standard to prevent the use of caged systems for layer hens (allow phasing out by deadline)

2. Part A – Chapter 4 ‘Facilities and Equipment’

Add a Standard to prohibit the use cages for any poultry.

Add a Standard to ensure adequate perch space for poultry who wish to perch.

Add a Standard to ensure that all species are provided with appropriate environmental enrichments; add guidelines in species-specific chapters

Convert Guideline 1.6 to a Standard to ensure all hens are provided with a nest.

3. Chapter 6 – Lighting

Amend Standard 6.3 to ensure the minimum light intensity for all poultry is at least 10 lux.

Amend Standard 6.5 to require 8 hours of continuous darkness in each 24 hour period for all poultry.

4. Chapter 8 – Litter Management

Add a Standard that requires that all indoor housed poultry have access to appropriate litter to allow all birds to forage and dustbathe.

5. Chapter 9 – Handling and husbandry

Induced moulting

Amend Standard 9.4 by removing ‘routinely’ to state ...induced moulting is not practiced.

Remove Standard 9.5 & 9.6 – these will now be redundant.

Remove Guidelines 9.16 and 9.17.

Beak or bill trimming

Add a Standard which states that a person in charge must not permit beak or bill trimming unless for animal welfare benefits and with minimal negative impacts on the birds and all other feasible solutions have been implemented, appropriately evaluated and deemed ineffective.

6. Part B – stocking densities

Change all stocking densities for different species to ensure that individual birds have sufficient room to exercise (e.g. walk, flap wings etc) and to express normal behaviours (e.g. nest, dustbath etc).

7. Humane killing and Humane Slaughter

Chapter 10 – Humane killing

Add Standards prohibiting unacceptable methods including;

- Mechanical neck crushing
- Cervical dislocation
- CO₂ gas unless used appropriately to prevent pain and distress

Add a Standard which states acceptable methods including;

- Appropriate captive bolt (penetrating & non-penetrating)
- Non aversive gas
- Appropriate use of CO₂ gas to prevent pain and distress

Chapter 11 – Poultry at slaughtering establishments

Add more standards pertaining to;

- The phasing out of electrical stunning
- Appropriate use of CO₂ gas to prevent pain and distress
- Use of CCTV to detect incidences where welfare is compromised along the processing chain
- Ensure appropriate steps are taken to ensure stunning and/or death

Thank you for the opportunity to provide comments on the Draft S&Gs. Limited time has prevented me from providing a more comprehensive submission but I hope this will be helpful. I believe the poultry industry, through appropriately resourced research and development will achieve further improvements in non-cage systems that will enhance the welfare of poultry. We must consider that in relative terms, investment in R&D by the industry in cage systems has far exceeded that for non-cage systems.

I feel hopeful for the future and that the Australian poultry industry, food industry, government, consumers and the community will be proud of these S&Gs, once they are finalised, knowing that hen welfare will be enhanced.

Kind regards,

A handwritten signature in black ink, appearing to read 'Di Evans', with a stylized flourish at the end.

Dr Di Evans BSc BVMS MPhil MANZCVS (Animal Welfare)