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Animal Welfare Standards Public Consultation

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Dear Animal Welfare Standards Public Consultation Team

Re: Draft Australian Animal Welfare Standards and Guidelines for Poultry

Thank you for the opportunity to make a submission to the Draft Australian Animal Welfare Standards and Guidelines for Poultry. The Greens NSW support a national approach to animal welfare standards and guidelines which are based on the following five freedoms (taken from the Brambell Committee and the Universities Federation for Animal Welfare):

1. Freedom from hunger and thirst - by ready access to fresh water and a diet to maintain full health and vigour.
2. Freedom from discomfort - by providing an appropriate environment including shelter and a comfortable resting place.
3. Freedom from pain, injury or disease - by prevention or rapid diagnosis and treatment.
4. Freedom to express normal behaviour - by providing sufficient space, proper facilities and company of the animal's own kind.
5. Freedom from fear and distress- by ensuring conditions and treatment that avoid mental suffering.

Regrettably, the standards proposed in the exhibited draft are completely inadequate to safeguard the welfare of animals in the poultry industry and also fail to meet community expectations. At a minimum, the standards should reflect the RSPCA Approved Farming Scheme Standards for layer hens, meat chickens and turkeys but the current draft standards do not even meet this mark.

The key issues of our concern and short comings of the draft standards and guidelines include:

- No ban on battery cages;
- Inappropriate indoor stocking densities;
- No prohibition on cruel practices like debeaking, bill trimming and forced moulting;
- No mandate for basic welfare measures like access to feed and water at all times, access to outdoor areas, access to perches, minimum hours of exposure to light or darkness, the provision of enrichment equipment for animals or access to surface water for waterfowl for swimming and bathing.

The Australian Consumer Law (Free Range Egg Labelling) Information Standard 2017, which allows farms with a stocking density of up to 10,000 birds per hectare to be called 'free range' was very disappointing for consumers and the community. These inadequate standards are similarly

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inappropriate, will not stop cruel practices and animals will continue to live and die in terrible conditions.

We urge you to include the following recommendation to address the shortcomings of the draft standards:

- **Recommendation 1: Ban on battery cages and inappropriate stocking densities**

Jurisdictions such as the Australian Capital Territory and the European Union have banned battery cages and they are being phased out in Canada, New Zealand and a number of states in the USA.

Battery cages confine hens in a very small and totally inadequate space and restrict their ability to exhibit natural behaviors such as wing stretching, preening, foraging and nesting. Battery cages cause severe physical and psychological distress to hens and cause unnecessary suffering to hens including pain injury and death.

The draft standards must include a process to rapidly phase out and end battery cage farming of poultry.

- **Recommendation 2: End the practice of debeaking**

The draft standards do not end the practice of debeaking, which is a painful procedure to remove up to a third of a bird's beak. Chickens also have trouble eating and grazing once they have been debeaked. Debeaking is used to manage anti-social behaviours, such as pecking, that result from cramped conditions in battery cages and as such is almost completely unnecessary if these conditions are eliminated. Moreover, more humane alternatives do exist.

These standards must include a ban on debeaking and the adoption of more humane alternatives.

- **Recommendation 3: Some proposed guidelines should become standards**

If these standards are genuine about protecting bird welfare then there are numerous vital animal welfare measures that are included in the non-mandatory guidelines and should become enforceable standards. These include:

- Mandatory access to outdoor areas;
- Mandatory access to litter;
- Mandatory access to forage;
- Mandatory access to enrichment equipment;
- Poultry should have enough vertical and horizontal space to stretch their limbs;
- Poultry should not have access to spoilt, contaminated food or harmful substances;
- Perches should be mandatory with a minimum 15cm per bird and 30cm between perches;
- Mandatory minimum requirement for no less than 20% of laying hens to have access to clean, dry nesting boxes or nesting colonies at any one time
- A ban on wire or plastic-coated wire nest box flooring
- Mandatory minimum 8 hours of light and 8 hours of darkness in a 24 hour period

These draft standards need to be substantially revised and many more guidelines, including the above, need to be upgraded to become mandatory and enforceable standards to improve animal welfare.

- **Recommendation 4: End forced moulting**

The RSPCA has recommended that the practice of forced moulting be eliminated from the industry. Forced moulting involves starving hens in order to force the next laying cycle to begin earlier than it would have naturally occurred, thereby increasing egg production at the expense of the welfare of hens.

These standards need to include ban forced moulting.

- **Recommendation 5: Mandatory CCTV cameras to monitor slaughter practices**

The draft standards do not contain the requirement for CCTV cameras to monitor the slaughter of poultry in order to ensure animal welfare standards are met. Animal welfare investigators have exposed numerous incidents of horrific animal cruelty and abuse in slaughterhouses. The provision of mandatory CCTV systems, which can be reviewed by appropriate government authorities and animal welfare organisations such as the RSPCA is absolutely necessary to ensure the humane handling of the animals before and during the slaughter process.

The standards therefore need to include a requirement for monitored CCTV in slaughterhouses. This will also give confidence to consumers that slaughterhouses are upholding minimum standards for animal welfare.

- **Recommendation 6: Poultry should have access to feed and water at all times**

The draft standard only requires that poultry should have access to feed and water once in a 24 hour period. This is totally unacceptable and it should be a requirement that poultry should have continuous access to feed and water as an enforceable standard.

- **Recommendation 7: Mandatory access to surface water for ducks and other waterfowl for swimming and bathing**

Ducks are mostly aquatic birds that require frequent access to water to clean themselves and to keep healthy. Ducks have an oil gland at the base of their tail that is only activated if they splash water on themselves. Without access to water, ducks are at risk of heat stress, illness and injury.

The requirement for access to water is only included in the non-mandatory guidelines, however it must be included as a standard to ensure all ducks kept in New South Wales have access to water.

- **Recommendation 8: Some guidelines should be standards for larger commercial operations.**

For larger commercial operations some guidelines must be elevated to become standards. These include those guidelines relating to induction programs for employees (GA1.2 and 1.4), regular inspections of poultry (GA 3.6), and the provision of alarm systems and firefighting equipment (GA 3.9). While we accept that a mandatory requirement for these could place an unacceptable and impractical regulatory burden on small commercial operations and backyard poultry owners, it is not unreasonable for these to be mandatory standards for larger commercial operations.

Finally, there are significant concerns about the independence of the process that has been undertaken to develop the Draft Animal Welfare Standards and Guidelines for Poultry. Documents obtained by the Animal Law Institute¹ appear to show that the NSW Government, which is the state leading this review, colluded with egg producers to ensure the draft standards are weak, including

¹ <http://www.abc.net.au/news/2017-12-21/egg-farmers-accused-of-colluding-with-nsw-government/9229242>

through secret meetings of a poultry management group before the standards-writing process had even begun. As such, this process must be investigated and the results reported publically.

Please feel free to contact my office if you require any further information.

Kind Regards



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