



Animal Liberation ACT

PO Box 320 Civic Square Canberra ACT 2608 info@al-act.org www.al-act.org

25/02/2018

ANIMAL LIBERATION ACT'S SUBMISSION TO THE PROPOSED DRAFT AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINE FOR POULTRY

Below is the submission by Animal Liberation ACT which addresses sections of the 'Proposed Draft Australian Animal Welfare Standards and Guideline for Poultry' ("the draft standards and guidelines").

1. 'Purpose' — Introduction:

On page 8 the draft standards and guidelines state that documents are to provide:

- "a. clear essential requirements ('standards') for animal welfare that can be verified and are transferable into legislation for effective regulation, and
- b. guidelines, to be produced concurrently with the standards but not enforced in legislation, to be considered by industry for incorporation into national industry QA along with the standards"

It seems nonsensical to develop a set of guidelines and yet not make these enforceable but only to be considered by industry. It is quite apparent that the Guidelines enhance animal welfare much more so than the Standards. But if guidelines are not enforceable then animal welfare is reduced to luck. We ask the government to reconsider and to enforce the guidelines rather than making them optional.

2. Section 4 'Facilities and Equipment'.

In this section there is no suggestion that current facilities and equipment be modified to achieve even the minimal standards mentioned here. Most housed poultry are in situations where they do not enjoy enough space to maintain a 'natural standing posture' or have support of 'forward facing toes' or be 'protected from excreta from birds perching above'. In caged facilities currently, for example, there is no room for birds to have any semblance of a natural posture. The cages and the wire on the bottom of the cages they are forced to stand on is not a natural environment for poultry and is not conducive to good welfare. Indeed, it has been exposed that most of the hens in these situations are in a terrible state of health with complete loss of feathers in some cases, with very pale combs which is indicative of health problems. Many are often found dead and rotting in the cages along with live chickens (<http://www.aussieeggs.com> 2018). The type of housing standards suggested in this section to nothing to compensate for the lack of space in which chickens can take part in natural behaviors such as roaming, dust bathing and natural (as opposed to unnatural as would be imposed by this section) social interactions (<http://www.agrifutures.com.au/farm-diversity/eggs-chicken/> 2018). Hens also like to nest as part of natural behaviors and in current sheds nesting boxes are rarely, if at all, used.

Animal Liberation ACT urges the government to insist on a vast improvement of the overall facilities and equipment standard and that the improvement consider the natural needs of the poultry. For example, no cages at all. More physical spaces for the poultry and an environment that allows them to participate in natural, inherent behaviors. By implementing facilities and equipment that take these needs into account real animal welfare is being addressed.

3. Section 5 'Management of Outdoor Systems'.

This section discusses the minimal welfare standards that should be reached. However it does not address the welfare of the hens allowed to be stocked in this situation. The new 'free-range egg' standard introduced by the government in 2017 allows producers to stock 10,000 hens on one hectare of land as opposed to the CSIRO's Model Code of Practice and RSPCA recommended 1500 hens per hectare. Nor does the new standard demand that birds be even given outdoor time (<https://www.choice.com.au/food-and-drink/meat-fish-and-eggs/eggs/articles/what-free-range-eggs-meet-the-model-code> , May 17 4 August 2017). So even though this section addresses important welfare aspects such as drainage, shelter, shade, and palatable vegetation, it is misleading to say the least because the government's own standard legislated in 2017 does not require that those who engage in 'free range' farming must allow hens outside. In this section the draft standards could be accused of 'window dressing'. The government's previous policy to do with free range hens precludes hens going outside. At the very least this means thousands of hens jammed in over-crowded sheds. They are not in cages but nor are they 'free range'.

Animal Liberation ACT urges the government to insist on a vast improvement of the outdoor systems standard and that the improvement consider the natural needs of the poultry. For example, insisting on actual time outdoors and building facilities which encourage poultry to utilize the outdoor space. By implementing proper outdoor facilities real animal welfare is being addressed.

4. Section 6 'Lighting'.

This section requires producers to allow 4 hours of continuous darkness within a 24 hour period (for laying poultry). This proposed welfare standard will contribute to a shortened life span and a shorter layer longevity of the bird themselves (<https://www.backyardchickens.com/articles/chickens-winter-egg-laying-and-lighting.64477/> 2013). Laying hens naturally stop laying in the darker colder months. Only allowing a 4 hour period of darkness within a 24 hour period is not good animal welfare. It is good for the industry which demands as many eggs as possible are pumped out continuously with 'spent hens' sent off for slaughter. Laying hens exposed to more light than dark produce more eggs (http://agritech.tnau.ac.in/expert_system/poultry/Lighting_2017). But it is not good welfare for the hen. Further excessive lighting (and the intensity and type of light) is linked to abnormal levels of aggressive behavior including feather pecking (Kjaer and Vestergaard 1999 cited in <https://www.european-poultry-science.com/The-effects-of-lighting-conditions-on-the-behaviour-of-laying-hens,QUIEPTQyMTk2MjgmTUIEPT2MTAxNA.html> 2009). Further, the proposed standards do not address the type of lighting which should be used to ensure good welfare outcomes for the laying hen. Thus, in recommending only 4 hours of darkness within a 24 hour period

(even though in Part B the specific guideline suggests 7 hours of continuous dark) the 'Proposed Australian Animal Welfare Standards and Guideline for Poultry' exposes how the proposed standards are written (in this case) for the benefit of the producer not for the welfare benefit of the hen.

Animal Liberation ACT urges the government to reconsider this standard and to allow a more natural sense of lighting that reflects the length of light and dark within a 24 hour period in the natural world to ensure a higher standard of welfare.

5. Section 7 discusses 'Temperature and ventilation'.

This section advises that hens not be exposed to ammonia levels greater than 20ppm. But research has demonstrated 'that, when given the choice of selecting compartments with 0, 10, 20, 30, and 40 ppm ammonia, laying hens chose the fresh air' (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4598711/> 2015). Further that 'A reduced ventilation rate during the cold season, to maintain a suitable indoor temperature, combined with manure being stored inside the hen house, is the main cause of ammonia sometimes reaching very high levels' (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4598711/> 2015). This exposes how the proposed standards favour the producer and only consider the welfare of the hen of minimal importance.

Animal Liberation ACT urges the government to reconsider this standard and to enforce regulations in building of facilities which allow for fresh air such as outdoor systems which within its environment allow for more natural temperature controls.

6. Section 9 'Handling and Husbandry'.

This section attempts to deal with handling of animals in a way that promotes the welfare of the bird. However, though many of the suggestions appear credible for example not carrying more than 4 birds at a time this shows a lack of understanding of how animals such as poultry should be handled and indeed would want to be handled. To be able to carry 4 birds at a time one would have to carry them by their legs, upside down. This act would create stress in birds making them highly anxious and could conceivably cause injury to the bird. Whereas the proposed standards demand 'A person must manage and handle poultry in a manner that minimises pain, stress or injury to birds' (Proposed Draft Australian Animal Welfare Standards and Guidelines —Poultry Public Consultation Nov 2017 p.30). Another issue is that of 'beak trimming'. The proposed standards suggest alternatives are used 'Alternative strategies for managing injurious (feather) pecking that minimise the need for beak trimming should be employed.' (Proposed Draft Australian Animal Welfare Standards and Guidelines —Poultry Public Consultation Nov 2017 p.32). In some countries this invasive and painful procedure is banned (http://kb.rspca.org.au/What-is-beak-trimming_629.html 2018). But this is a common practice within the Australian laying hen industry for example. There are alternatives but these alternatives which could include allowing free range farming (with outdoor time) and stocking to 1500 per hectare would obviously cost the

industry more. However, Animal Liberation ACT argues alternatives such as these are imperative to bring real welfare reform.

7. Section 10 'Humane killing'

Contrary to the proposed standards listed here there is no 'humane' way of killing an animal. However, regarding the proposed standards while there are protocols to follow there is no policing of those protocols. Just because there are standards does not mean those standards will be followed. Animal Liberation ACT argues that best practice should involve the use of CCTV which is independently monitored. This is the only way to ensure a minimum adherence to welfare protocols.

8. Section 11 'Poultry at slaughtering establishments'

Contrary to the proposed standards 'Processing of poultry is done promptly, safely and humanely' there is no 'humane' way of killing an animal. However, regarding the proposed standards while there are protocols to follow there is no policing of those protocols. Just because there are standards does not mean those standards will be followed. Animal Liberation ACT argues that best practice should involve the use of CCTV which is independently monitored. This is the only way to ensure a minimum adherence to welfare protocols in slaughtering establishments.

Carol Drew

Committee, Animal Liberation ACT
Canberra ACT

References

Kjaer and Vestergaard 1999 cited in <https://www.european-poultry-science.com/The-effects-of-lighting-conditions-on-the-behaviour-of-laying-hens,QUIEPTQyMTk2MjgmTUIEPTe2MTAxNA.html> 2009

<http://www.aussieeggs.com> 2018

<http://www.agrifutures.com.au/farm-diversity/eggs-chicken/> 2018

<https://www.backyardchickens.com/articles/chickens-winter-egg-laying-and-lighting.64477/>
2013

<https://www.choice.com.au/food-and-drink/meat-fish-and-eggs/eggs/articles/what-free-range-eggs-meet-the-model-code>, 2017

http://agritech.tnau.ac.in/expert_system/poultry/Lighting 2017

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4598711/> 2015

http://kb.rspca.org.au/What-is-beak-trimming_629.html 2018