

Review of the Proposed Australian animal welfare standards and guidelines for poultry.

SA1.1: “Reasonable” is not defined and this makes the standard poor in terms of regulatability. This is an issue with all “Standards and Guidelines” produced so far but is included out of completeness.

SA1.2: “Competence” is again not defined so this is of little value as an enforceable standard.

GA1.1: This is a base level of competence that should be required to keep livestock of any kind. Having an acceptable quality and quantity of feed and water and taking action when animals are found to be weak or injured should be standards.

GA1.2, 1.3 and 1.4: These are standard requirements for ISO quality management systems that should be in place in any food production business however leaving them as guidelines to protect small “cottage industries” can be acceptable.

SA2.1: “reasonable access to adequate and appropriate feed and water” is poorly defined. All animals that imbibe water should have unrestricted access to clean, potable water at all times.

SA2.6: The lack of grammatical structure for this standard makes it open to interpretation. This is poor form for a standard that needs to be uniformly implemented around the country. I.e. ‘With the exception of emus and ostriches, a person in charge must ensure poultry over 4 days old are not deprived of feed for more than 12 hours prior to depopulation’ is more clear as we know the time period applies to all poultry and not just ostriches under 4 days old and general fowl.

GA2.1: this should be a standard

GA2.2: this should be a standard and absolute limits put in place (i.e. number of hours for each class of poultry)

GA2.3: this should be a standard

GA2.5: this should be a standard

GA2.12 and 2.15: these should be standards

GA3.6 and 3.7: For large establishments (over 200 layers or 5000 broilers for instance) these should be standards

GA3.18: This guideline applies more to certain types of poultry (i.e. broiler chickens) and is a production issue.

GA4.2: This should be a standard for anything “likely to cause an injury” as otherwise the guideline doesn’t go as far as any of the state Animal welfare or POCTA Acts.

GA4.8: This should definitely be a standard

SA5.1: This is not necessary as a standard so long as animals have proper access to both indoors and outdoors. This means Standard 5.2 makes 5.1 unnecessary but not vice versa.

SA5.3: The term “seriously” should be removed, causing disease is bad enough and the definition of ‘seriously’ will be impossible to define properly in regulations

SA6.3: This level is ridiculously low and given it is an average will not apply properly to cage systems. More sensible would be stating something like 'Poultry need a minimum of 25 lumens at the position of the bird with the exception of in nesting boxes'.

SA6.5: I see no reason this standard should not apply to all poultry. It is an unnatural state for all birds.

SA7.1: This standard is very obtuse which makes it irrelevant for making coherent regulations between different jurisdictions.

GA7.3: "extreme" needs to be defined for appropriate regulations to be created or even a MCOP if that is the idea behind the guidelines. I suggest including a temperature and humidity at least.

GA7.4: This should be a standard

GA7.6: A standard should be made that sets out absolute minimum levels of inspection for large commercial facilities.

GA8.2: This should be a standard.

SA9.3: Given 'reasonable' is not defined this makes for poor regulation making ability. A time period that is reasonable should be given to ensure compliance (ie must be checked and freed if caught daily).

SA9.4: Induced moulting should not be used at all.

SA9.5: as SA9.4

SA9.6, 3): This standard is made useless if body weight measurement is not needed before someone is inducing a molt

SA9.18: 'Regularly' needs to be defined for coherent regulations around the country.

GA9.4: this should be a standard and even so the number is inappropriately high. This document is for improving and regulating welfare.

GA9.8: this should be a standard and this number is too high for day old chicks.

GA10.2 Low atmospheric pressure stunning and gas stunning using non-inert gasses like carbon monoxide should be added to this list.

SB1.3: This is inadequate for modern standards and far less than would thought to be appropriate for a modern western country by either Australians or the international community.

SB1.5: This is inadequate

SB1.6: This is a level that was considered the minimum appropriate 18 years ago. The world has moved on and these are no longer appropriate minimums.

SB1.7: This is a level that was considered the minimum appropriate 18 years ago. The world has moved on and these are no longer appropriate minimums.

SB1.8: This is a level that was considered the minimum appropriate 18 years ago. The world has moved on and these are no longer appropriate minimums.

GB1.1: This is too large of a hole size for young chickens and not ideal for older chickens either.

GB1.2: This should be a standard.

GB1.3: This is inadequate and regardless should be a standard.

GB1.4: This should be a standard.

GB1.7: This should be a standard.

GB1.0: This should be a standard.

GB1.16: This should be a standard.

GB1.21: This should be a standard for fair marketing.

GB1.23: This should be a standard.

GB1.27: This should be increased and be a standard.

SB2.3: Like the space allowances for layer hens these allowances are outdated and show poor welfare compared to what is required for the animals to express normal behaviours and obtain the necessary exercise to promote bone strength. Because of this they should be increased. Please see EU research "The Welfare of Chickens Kept for Meat Production" from March 2000 for more info. A more appropriate maximum allowance would be 25kg/ square meter.

SB3.3: This is an inadequate height and will not allow injured or dead birds to be humanely disposed of.

SB3.8: This is inadequate.

SB3.9: Like the space allowances for layer hens these allowances are outdated and show poor welfare compared to what is required for the animals to express normal behaviours and obtain the necessary exercise to promote bone strength. Because of this they should be increased. Please see EU research "The Welfare of Chickens Kept for Meat Production" from March 2000 for more info. A more appropriate maximum allowance for all cage systems (if we cannot remove this production system altogether which would be preferable) would be 25kg/ square meter.

SB3.10: A more appropriate space would be 25kg/square meter.

