



PO BOX 171
Tugun QLD 4224
P: 07 56591429

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Animal Welfare Standards Public Consultation
PO Box 5116
Braddon ACT 2612

Dear Sir/Madam,

PROOF is a certification program for pasture raised livestock (Certification Trademark No. 1784876). The majority of our licensed members are poultry producers.

We understand that the Standards within the draft Code will provide a basis for developing and implementing consistent legislation and enforcement across Australia and that such Standards must be met under law.

Given the history of present Model Code and the arguments that have arisen and the resulting divisions within the poultry industry, it is of paramount importance to us that the revised code is clear, concise and free of ambiguity and is able to be applied fairly to all production systems, including pastured based farms. For these reasons we would like to address what we believe are areas of the draft code that are conflicting and/or lack clarity.

Issue: Conflicting Standards/Guidelines

Standards for animal welfare are to be clear essential requirements that can be verified and are transferable into legislation for effective regulation.

Guidelines are not enforced in legislation but are to be considered by industry for incorporation into national industry QA.

We have identified the following conflicts between what is written as a Standard and as a Guideline that could not only cause confusion and non-compliance with legislation (when it comes into force) but could also be detrimental to animal welfare:

Perches

Standard SA4.2 states that "A person in charge must ensure all housing systems are designed to allow poultry to maintain a natural standing posture."

Guideline BG1.15 states that "Perches should be provided at not less than 15 cm per bird unless a producer is able to demonstrate that this would obstruct movement of birds and people throughout the laying facility in which case no less than 7.5 cm per bird is permitted."

Comment: No laying hen can possibly fit in a 7.5 cm space. There is no clear justification for such an inclusion in the Poultry Welfare Standards and Guidelines – Nests, Perches, Dust-Bathing supporting Paper. The guideline that would allow a reduction of perching space to 7.5cm must be removed.

Lighting

Standard SA6.5 states that “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.”

Standard SB1.5 states that “A person in charge must ensure that after the training period, where hens are housed under artificial light, lighting schedules must provide a minimum of 4 hours of continuous darkness in each 24-hour period.”

Guideline GB1.2 requires 8 hours of continuous artificial or natural lighting per day for laying chickens.

Comment: There is clearly a need for at least 2 sessions of 4 hours of continuous darkness. This change to only 4 hours of continuous darkness in a 24 hour period is not in the best interest of the welfare of the birds.

“Darkness benefits birds by allowing them to sleep and develop diurnal rhythms. One or two periods of 4 hours (or more) of continuous darkness in each 24 period support positive welfare outcomes in poultry reared under artificial light (Schwean-Lardner et al., 2013).” (Supporting paper)

Beak Trimming

Standard SA9.15 states that “A person must not remove more than one-third of the upper and lower beaks.”

The Glossary within the draft code defines Beak Trimming as “The removal of the tip of the beak of poultry by specially designed equipment to prevent cannibalism and its associated vices.”

Comment: Together, this standard and related glossary definition are misleading and deceptive. If it is permissible under the Standard to remove one third of both the upper and lower beaks, the glossary definition must reflect this. The current definition would serve to deceive consumers as to the welfare status of the birds.

Management of outdoor systems

Standard SA5.5 states that ‘A person in charge must ensure that poultry are able to be confined as required in compliance with housing standards to manage welfare risks to birds in the outdoor area.’

Comment: The purpose of this standard is unclear. We can only assume that it means that the poultry could be confined inside housing to manage a welfare risk if one was present in the outdoor area. If this is the case, this standard is open to abuse and must be revised.

Guideline GA5.4 states that “Poultry should be confined at night to mitigate predation and biosecurity risks.”

Comment: The draft code does not provide a meaning for ‘confined’. The draft does refer to housing systems for poultry and includes a definition in the Glossary for housing of non-caged birds. However, there is no indication of what ‘confined’ means. If the intent is that confined should mean limited to a certain location (eg. A smaller area surrounding a mobile shelter that is defined with

electric bird netting), then this should be made very clear to avoid confusion and perhaps insistence by some parties or authorities that the birds must be confined within a shed.

We thank you for this opportunity to comment on these issues.

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

Lee McCosker

CEO PROOF