

Dear Sir/ Madam,

Please find below my comments on the *Proposed draft Australian animal welfare standards and guidelines for poultry*. I generally find them very disappointing and inadequate for minimizing the suffering of farmed poultry.

Part A: General standards

2 Feed and water

SA2.2 "Access to food at least once in each 24 hour period" does not specify duration – 5 seconds of feeding once a day would meet this requirement. Should be more specific.

SA2.3 Same as SA2.2 in regards to water. Additionally, this paragraph suggests that chicks <3 days old do not require access to drinking water at least one a day, and chicks do not require any water for the first 3 days of their life. This is ridiculous.

3 Risk management

SA3.1 This relates to protection from threats. There are no standards requiring action in the event of a threat – e.g. rescue or release of poultry to prevent them being burnt alive in a fire. Livestock dying in fires because they are trapped is a frequent occurrence, and is a horrible way to die. Owners must be required to rescue or allow poultry to escape in the event of an emergency. Contingency planning as guidelines is not sufficient.

SA3.5 "Access to shelter from adverse weather" is not sufficient to prevent against heat or cold stress, particularly in sheds which are not insulated. Equipment that can regulate temperatures, or provision of deep litter/bedding material, should be required.

GA3.17 Beak trimming should not be allowed. Owners should be required to use alternative management methods to manage aggression (humans are supposedly the smartest animal of the planet after all). Management methods should include the provision of environmental enrichment and complexity, facilities for birds to escape other birds, reduced stocking densities, and reducing stress and fearfulness (e.g. by reducing noise and disturbance).

GA3.18 Does the treatment of lameness include not breeding poultry to be so ginormous that their legs can't bear their own weight? There should be weight at age standards for poultry to ensure adequate welfare and minimise suffering, and bred so that they put on weight at a normal rate. The price of poultry is ridiculously cheap and consumers should pay more.

4 Facilities and equipment

These standards are grossly deficient. All poultry should be required to have access to an outdoor area, as sheds do not allow sufficient natural light to enter and artificial lighting is inadequate. All animals require natural light. At the very minimum, there should be a standard that requires sheds to have windows and allow a specified minimum level of natural light in.

SA4.2 Housing systems should be designed to allow poultry adequate room to stretch and flap their wings, not just “maintain a natural standing posture.” The minimum standard as specified is grossly inadequate.

GA4.5 Environmental enrichment should be provided, not merely “considered”. This will reduce stress on the animals and result in better welfare.

5 Management of outdoor systems

SA5.3 The word “seriously” should be removed. It is subjective and doesn’t add value, and provides an out for owners to keep poultry on contaminated lands such that this harms the animals.

GA5.1 Should include minimise the risk of predation as a dot point.

6 Lighting

SA6.3 An average light intensity of at least 5 lux during light periods is ludicrous! Poultry kept in sheds already suffer from being kept indoors their entire lives. Lighting should mimic natural conditions as far as possible, i.e. the light intensity of sunlight during daylight periods (or at least 50 lux).

GA6.2 Why are chicks allowed to have 23 hours of light during a 24 hour period?! This is stupid. How would you like to have 1 hour of darkness per day? Lighting should mimic what poultry would naturally have in the wild as far as possible.

7 Temperature and ventilation

Corrective action to adjust air quality parameters should be taken before signs of stress/suffering (as in GA7.4) are observed. Actions should be taken based on monitoring (see GA7.6 below). The document should specify the range for each air quality parameter that would maintain a comfortable environment for poultry.

GA7.5 Add a list of actions that should be considered during extreme weather conditions, e.g. reducing stocking densities, spraying with water, providing buckets of cool water, increasing litter, adding heaters etc.

GA7.6 Add “and corrective action taken if parameters fall outside the optimum range” at the end of the first sentence.

8 Litter management

This section implies that use of litter is optional and not always appropriate. When would the use of litter, required for poultry to display natural behaviour, not be appropriate?

SA8.1-8.3 Remove the phrase “where litter is used”.

GA8.2 Remove the words “where appropriate”

9 Handling and husbandry

Mutilation of animals is cruel and should not be practiced. Other methods to control aggression, such as lower stocking densities, should be used. If these practices are

maintained, at the very least require that they are undertaken by a vet and appropriate pain relief is administered, even for young chicks.

SA9.8 Pinioning, castration and devoicing should not be allowed.

SA9.9-9.10 Desnooding, dubbing and despurring should not be allowed.

SA9.11 Toe trimming should not be allowed, for the same reason that declawing of cats is not acceptable. Nail clipping can be done instead.

SA9.12 All surgical procedures should be done by a vet.

SA9.14-9.15 Beak trimming should not be allowed.

SA9.20 Replace “are killed” with “are humanely killed”.

GA9.1-9.2 Add “likelihood of aggression”.

GA9.4 How does a person carry 4 birds in each hand without harming the bird, unless they are chicks? Poultry should not be carried by their legs/feet, particularly broilers which have small fragile legs compared to their body weight. This also depends on the species. The guideline is stupid and vague, remove and add into guidelines for each species.

GA9.5 The wording “enable them to land normally” means that a person can throw a bird to the ground even if it doesn’t land on its feet. Change to “from low heights such that they land on their feet.”

GA9.12-9.15 Beak trimming should not be allowed.

GA9.16 I would not consider “limitation of available grower space” an exceptional circumstance that necessitates induced moulting.

GA9.19 This makes no sense whatsoever. How can unhatched eggs be killed within the day of hatch, if they haven’t hatched??

10 Humane killing

GA10.2 Should include the requirement that killing machines are loaded with animals at a rate (i.e. not too high) that ensures a proper and rapid death.

GA10.3 “Collapse” within 35 seconds is not a rapid death. To be painless it should be immediate.

11 Poultry at slaughtering establishments

The standards should include a requirement that animals are put through stunning/killing systems at a rate (i.e. not too high) that allows the machines to operate effectively and ensures a rapid loss of consciousness or rapid death.

SA11.4 is inconsistent with GA10.2 which refers to “stunning by blunt trauma”.

GA11.2 Should be checked at least every half an hour. Animals in holding areas can get trapped and suffer terribly that time. Using a camera would be an efficient method of monitoring.

GA11.5 What is “undue trauma”? This vague term allows for a great degree of trauma to occur. Remove the word “undue”.

GA11.14 “Minimal distress” is vague. There should be standards/guidelines about what level of trauma/suffering/distress is considered acceptable.

GA11.15 Unclear whether poultry must be stunned prior to being slaughtered. As written, this guideline allows for animals’ throats to be cut and bled out while they are still alive. However, GA10.7 suggests that animals must be unconscious prior to being cut. I presume this is the case for slaughtering establishments, and needs to be stated explicitly.

Part B: Species standards

B1 Laying chickens

SB1.3 Poultry should not be kept in cages! However, as it is unlikely the law will change anytime soon, if kept in cages they should at least be able to stretch and raise their heads, not simply stand “at normal height” which means that some birds will have their heads hitting the roof. Cage heights should be at least 60 cm.

SB1.5 All hens should be housed in areas which provide some natural light. This standard allows hens to be housed in windowless sheds where artificial light is the only source of light. Disgusting.

SB1.6 These stocking densities are way too high. The highest equates to a bird having an area less than the size of an A4 sheet of paper! Each single bird should have space to flap their wings, and an area of at least 1000cm².

SB1.7 These stocking densities based on weight are too high, and should not exceed 34kg/m².

GB1.3 An average light intensity of at least 10 lux during light periods is hopeless. Poultry kept in sheds already suffer from being kept indoors their entire lives. Lighting should mimic natural conditions as far as possible, i.e. the light intensity of sunlight during daylight periods (or at least 50 lux).

GB1.7 One nest for every 7 birds or 1 m² nesting box area for every 120 birds is too low. I doubt farmers would have only a seventh of their chickens laying eggs at any one time.

GB1.12 What do electric wires do, give the birds electric shocks? If so this is appalling. Surely walls and corners can be blocked off to prevent floor eggs.

GB1.13 The words “if possible” should be removed.

GB1.15 All birds should have at least 15cm perch. If this obstructs movement of birds and people in the facility then the stocking densities are simply too high. 7cm is ludicrous.

GB1.21 A minimum time period for access to the outdoor area should be specified. As stated, this guideline could be met by allowing 1 minute of access to the outdoor area per day, which is grossly inadequate.

GB1.23 A minimum 8m² of shade per 1000 birds is too low.

GB1.27 Does a cage height of 45 cm allow the birds to stretch and move their necks freely? Cage heights should be at least 60 cm.

B2 Meat chickens

SB2.2 Surgical procedures involving mutilation, such as beak trimming, should not be allowed.

SB2.3 Stocking densities are too high, they should not exceed 34 kg/m². Chickens must have room to move and flap their wings.

B3 Meat and laying chicken breeders

SB3.1 The wording is loose, as what “compromises” health can be subjectively interpreted. Should require a minimum frequency for cleaning out cages.

SB3.3 Again, “normal height” is stupid. Height of cages should be at least 60 cm.

SB3.5 Hens should not be housed under artificial light only. Natural light should be required (see comments under A4).

SB3.6 Chickens should not be lifted or carried by the legs/feet either. They should be carried properly as they would in a vet clinic.

SB3.8 Stocking densities are too high. See comment under SB1.6.

SB3.9 Stocking densities too high. See comment under SB1.7.

GB3.1 Nest density – see comment under GB1.7.

B4 Ducks

SB4.1 See comment under SB3.6.

SB4.2-4.3 Bill trimming should not be allowed.

SB4.4 Water must be clean, and enough provided to allow ducks to swim, not just merely dip their heads in it or be misted.

SB4.6 Stocking densities are too high, and should not exceed 17kg/m².

GB4.1-4.2 See comment under SB4.2-4.3.

GB4.3 See comment under SB4.4.

B5 Emus

SB5.1 Add to end of sentence “without harming any animals.”

GB5.15 Emus, like all farmed animals, should have access to natural daylight. This business about only providing artificial lighting is abuse.

GB5.22 Toe trimming and other removal of body parts should not be allowed.

B6 Geese

GB6.4 It must be ensured that any dogs used are appropriately trained and do not harm the geese.

B7 Guinea fowl

SB7.1 See comment under SB3.6.

SB7.2 Guinea fowl should not be kept in cages. Stocking density for adults in cages is too high, and should be no higher than the stocking density of adults not kept in cages.

B8 Ostriches

SB8.1 Add to end of first sentence "in consultation with a vet".

GB8.12-8.13 These guidelines should apply to all farm animals.

GB8.14 Water should be included.

B11 Pigeons

Housing should provide sufficient natural light.

GB11.9 State what the exercise and racing plans should include (e.g. access to food and water?).

GB11.15 All pigeons should have access to an outdoor area.

GB11.18 Pigeons should also be provided water after exercise.

B12 Quail

SB12.3 Stocking densities are again too high. They equate to 100 adults/m² (or 100cm² per adult bird), which is stupid.

B13 Turkeys

The growth of turkeys should be regulated so that they grow at a normal weight to enable natural breeding. Physical modification of animals creates incredible suffering, and is abusive and cruel in the highest degree. It must stop! Imagine if we bred women to have enlarged breasts so we can pump their milk to sell?

SB13.1 Surely people engaged in artificial insemination need proper qualifications and certification.

SB13.3 Turkeys should not be lifted by the legs. They are too large for their legs to support their own weight.

SB13.5 Again, stocking density is appalling high and should not exceed 34 kg/m². Intensive farming should be banned; all animals should have sufficient space to move around and flap their wings. All sheds should have sufficient natural light, and all turkeys should have access to an outdoor area.

GB13.4 Appropriate litter/bedding should be provided. Or are you proposing that keeping turkeys on a hard concrete floor, in a dark shed, is humane?

GB13.5 Nesting area is too small. How can 5 breeding hens fit in a space 44 cm x 44 cm.

GB13.10 See comments under GB1.3.

GB13.11-13.12 Beak trimming should not be allowed.

GB13.14 This should be a standard, requiring that toms must be rested if injury has occurred.

GB13.15 Beak trimming should not be allowed.

GB13.18 Turkeys should not be carried by their legs! If needed to be held upside down their body should be supported.

GB13.19-13.20 See comment under GB13.18.

Regards

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