

Review of Proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry.

Darwalla response to ACMF

Darwalla makes the following response to the review of the proposed draft welfare standards within the scope of the Darwalla operations viz. meat chicken production, both intensive and free range.

As a forward comment, we suggest that all submissions presented to the review are read in the context of the person or persons who make the submission, with regard to their specific level of training, expertise or experience in the management and husbandry of poultry, in order to maintain a degree of sensibility and rationale in the review process. This is in order to assess the credibility of the statements made by the submitter.

Specific comments are made in relation to each of the Standards and Guidelines as presented in the draft document

<p><u>S1 Responsibilities</u> SA1.1 A person must take reasonable actions to ensure the welfare of poultry under their care.</p> <p>SA1.2 A person involved in any part of poultry production must be competent to perform their required task, or must be supervised by a competent person.</p>	<p>We agree with this statement.</p> <p>We believe the guidelines GA 1.2, 1.3 and 1.4 should be worded more strongly to incorporate more transparent and structured training of responsible persons.</p>
<p><u>S2. Feed and Water</u> SA2.2 A person in charge must ensure poultry, other than newly hatched poultry or where skip-a-day feeding (acceptable for broiler breeders) have access to food at least once in each 24 hour period.</p> <p>SA2.6 A person in charge must ensure poultry except for emus and ostriches over 4 days old are not deprived of feed for more than 12 hours prior to depopulation or pick up.</p>	<p>Note SA2.2 skip-a-day feeding. The glossary definition of this practice is incorrect and very misleading: <i>“Removing feed for 8-24 hour periods during the starter period which reduces early rapid growth and meat yield in broiler chickens.”</i> This definition must be rewritten to accurately reflect the practice. It is a practice of feeding two days of rations on alternate days to meat breeder birds, not broiler chickens. The overall nutrient intake is not compromised during this procedure.</p> <p>Skip-a-day feeding must be included in the revised standards for broiler breeders as a significant welfare benefit, in order to control weight and avoid health issues from being overweight.</p> <p>SA2.6 is in contravention with the guidelines for acceptable feed withdrawal times as stipulated by SafeFood Queensland for production of wholesome food.</p>

<p>GA2.6 Feed should be carefully assessed for suitability and safety</p> <p>Water guidelines</p>	<p>GA2.6 how will this be evaluated? Poultry nutrition is a specialised profession and assessment for suitability and safety can only be done by suitably trained persons, who have knowledge of poultry health and wellbeing.</p> <p>There is no guiding principle on the quality or potability of drinking water. This is a significant welfare deficiency.</p>
<p><u>S3 Risk management of extreme weather, natural disasters, disease, injury and predation</u></p> <p>SA3.5 A person in charge must ensure poultry have access to shelter from adverse weather that is likely to cause heat or cold stress, and to minimise the risk of predation.</p> <p>Guidelines – disease and injury</p> <p>GA 3.17 re feather pecking and cannibalism</p> <p>GA3.19 Predator control programs should be implemented where predation is a significant risk</p>	<p>SA3.5 is in contradiction with current free range requirements in that predation cannot be reasonably minimised in free range farming situations, unless netting or similar is allowed as a standard.</p> <p>There is no comment supporting the use of appropriate veterinary therapeutics to treat disease.</p> <p>The wording should include the word “prevention” as well as the word management</p> <p>GA3.19 implies that the welfare of predators could be compromised in order to protect the welfare of poultry. Should be reworded to recommend “avoidance programs” rather than “control programs”</p>
<p><u>S4 Facilities and Equipment</u></p> <p>S4.5 A person must ensure that poultry on perches are protected from excreta from birds perching above.</p>	<p>S4.5 is irrelevant to health and welfare in modern floor-based systems where poultry are exposed to excreta continuously. Should be deleted.</p>
<p><u>S5 Management of Outdoor systems</u></p> <p>GA5.1 The outdoor area should be actively managed and maintained to:...</p> <p>GA5.4 Poultry should be confined at night to mitigate predation and biosecurity risks.</p> <p>GA5.5 re presence of disease organisms...</p>	<p>Objective: there should be acknowledgement that allowing birds access to outdoor areas contributes significantly to the risk of disease, parasitism and predation, and management must account for this increased risk.</p> <p>There is no mention of minimising contact with wild or domestic animals.</p> <p>There is no difference between biosecurity risk in daylight hours and night time hours.</p> <p>Misleading statement. This statement should not be confined to outdoors areas. It is a fundamental health</p>

	management requirement in all housing systems.
<p><u>S6 Lighting</u></p> <p>SA6.5 a person in charge must ensure poultry except for emus, ostriches and quail are exposed to at least 4 hours of continuous darkness within a 24 hour period.</p> <p>SA6.3 A person in charge must ensure the light intensity for poultry is at least 5 lux on average during light periods</p> <p>GA6.1 Natural and artificial lighting should be evenly distributed to facilitate the distribution of poultry over the floor area and avoid overcrowding</p>	<p>This is in conflict with standard SB2.1 which states that minimum 4 hours dark is not required till after 7 days of age.</p> <p>There needs to be allowance to lower this level as a management tool to control feather pecking and cannibalism.</p> <p>Meat breeders cannot have lighting in nest boxes so this needs to be clarified in the guidelines.</p>
<p><u>7. Temperature and ventilation</u></p> <p>GA7.2 Brooder areas should be pre-heated before placement of day-old poultry and the temperature managed at a level that minimises the risk to the welfare of poultry.</p> <p>GA7.4 Corrective action should be taken immediately if signs of stress (sneezing, prolonged panting and wing extension due to heat or huddling due to cold) are observed.</p>	<p>Pre-heating is imperative to the health and well-being of day-old chicks and should be given greater emphasis than a guideline.</p> <p>Sneezing is not a sign of heat or cold stress.</p>
<p><u>8. Litter Management</u></p>	
<p><u>9. Handling and husbandry</u></p> <p>SA9.1 a person must manage and handle poultry in a manner that minimises pain, stress or injury to birds.</p> <p>Beak trimming</p>	<p>Pain and injury must not occur during routine handling. This should be reworded.</p> <p>When beak trimming is performed on birds older than day of age, it must be on veterinary advice and only in order to manage cannibalism</p>
<p><u>10 Humane Killing</u></p>	
<p><u>11. Poultry at Slaughtering Establishments</u></p> <p>GA11.2 All poultry in holding areas should be checked at a minimum of every 2 hours for welfare. Checks should be recorded on the daily monitoring form.</p>	<p>2 hours is too long, as heat stress can occur much more quickly if ventilation is inadequate in extreme conditions.</p>
<p><u>Section B2 Meat Chickens</u></p>	
<p><u>Section B3 Meat and Laying Chicken Breeders</u></p>	