

SA Ingham Chicken Growers Group

Comments on proposed

Draft Australian Animal Welfare Standards and Guidelines for Poultry

Version Nov 2017

Background

1. The SA Ingham Chicken Growers Group grow out meat chickens for Ingham and represent their largest State production at about 40% of total Ingham production. With Ingham holding about 40% of Australian commercial poultry meat production then the SA Ingham Growers contribute about 16% of all of Australia's commercial chicken meat production.
2. Collectively the SA Ingham Growers arguably have the highest proportion of new grow out sheds in Australia. These sheds are the equal to other leading nations in this sector of primary production.
3. As part of a vertically integrated chain producing chicken meat for the Australian consumer, on a per capita basis SA Ingham growers contribute about 40% of the total capital investment to that chain.
4. Our Broiler and Free Range sheds are equipped with dynamic and continuous 24/7 monitoring and significant back up procedures (eg fully alarmed of temperature, water, ventilation etc and our electricity back up is superior to most if not all major hospitals in Australia).
5. The SA Ingham growers operate under exacting standards and are regularly monitored / inspected / assessed by Ingham, the RSPCA, Bio-security SA, Food SA, the SA EPA, as well as major customers of Ingham who variously conduct their own audits of our chicken growing.
6. Our group of growers has seen significant advances in animal husbandry in the last few years that has delivered on chicken welfare standards to such an extent as to differentiate our joint efforts with Ingham from a number of other chicken production systems.
7. It is to be noted that except for two individuals inside the SA PIRSA we have had little government assistance which is puzzling given the size of the industry. Similarly the growers have had minimal industry assistance from governments.

Comments on the Draft Version Nov 2017

1. Given our position in the chicken meat industry (both size and methods) we find it disappointing we were not included in the process of generating at least part of the Draft Standards and Guidelines under discussion.
2. We agree that there should be General Provisions and Specific Provisions but we find them too general especially the lack of science and specific guidance numbers and the failure to break down chicken meat production into at least

several sub groups eg Broiler Tunnel / Barn, Free Range Tunnel / Barn, medium Broiler Tunnel / Barn and Medium / Small Free Range non Tunnel / Barn as each has their own characteristics.

3. In the area of page 9 reference is made that these standards and guidelines should be considered alongside some other related requirements and legislation related to poultry welfare. The more general issue of transport is listed. Because transport is widely woven into various aspects of poultry production and is a welfare issue at least a summary of other pertinent guidelines should be embodied in this document.
4. In the area of page 11 'risk to welfare of poultry' and 'principles for poultry welfare' need much more definition and ranking, ranked items might include clean water and feed, adverse weather / temperatures, general bio-security, specific bio-security, relationship to the natural environment (especially native birds that are already under pressure), the immediate chicken husbandry environment including litter, chicken handling (egg to processing), cartage, production waste and recycling etc.
5. By way of example why not set some temperature goals for the chickens in production (at least for chicken meat production) of say a range between 18 degrees Celsius to 30 degrees Celsius. We provide extensive evaporative cooling with fans at up to 3.5m/sec across the floor wind speed achieving about 15 degrees Celsius effective cooling off temperatures up to 45 degrees Celsius. 'Caravan' Free Range does not achieve these standards yet the public does not appreciate this because there are no objective measures in place as a standard or goal. 'Caravan' Free Range similarly argues a less dense environment yet for night time or at least 12 hours every day they are arguably more densely housed than Tunnel / Barn chickens in much less comfortable conditions. Other simple measures could be developed for litter and dampness, water quality, feed bio-security etc.
6. To help the Australian consumer there could be a broad production system ranking in regards to welfare and standards such as occurs for water use (eg WC's and Dishwashers), fuel consumption in cars, electricity consumption efficiency for white goods). At present most consumers of chicken meat are confused by the various marketing strategies for chicken meat. Does the current message to consumers equate with what happens on the ground. In most cases not. Already some of Ingham major customers measure our performance against a transparent checklist with the bulk of checks covering items of chicken welfare and production standards. This would greatly assist the consumer in making an informed choice at point of purchase.
7. Achieving improved bird welfare and production standards comes at a cost. The SA Ingham growers (jointly with Ingham, Bio-security SA and others) have invested heavily in bringing about sustainable advances to bird welfare and associated standards but this has not even been partly rewarded because the public is not appropriately informed and cannot be informed if there is no ranking of measures.

8. The following are a few brief comments on other items.
9. Feed guidelines. GA2.2 and GA 2.3 need numbers. However the feed section should have started with the issue of feed cleanliness commencing with cartage, storage and protection against vermin and native animals / birds. GA2.5 is vague. Should some of the data for these items be kept for at least three batches for food and bio-security tracing. We already do this but it is not recognised by many and certainly not in the price we receive. Water guidelines need numbers. Quality issues need definition and recording again for food and bio-security reasons.
10. Risk Management strategies aimed at dampening the impacts of weather extremes on chicken comfort levels needs more detail and numbers. Disease, disease vectors and pest management all need more detail. Some current Planning and EPA regulatory / advisory guidelines are mainly based on numbers and not on a more empirical measure of the dynamics of various systems. The SA Ingham growers Tunnel / Barn chicken sheds are managed such that there is almost no possible contact with native birds or vermin, litter is regularly tilled and monitored for dryness, we achieve ammonia levels of less than 15ppm at bird head height and litter is renewed every batch. Yet we are required to have the largest separation distances of any chicken meat growing system measuring in excess of a km far and above standards in the UK, the EU, the USA and Canada. These discrepancies with other systems are both a scientific nonsense and unfair. We are also set the very highest fire fighting standards (both sheds and bushfire) while other systems have none including against bushfire which surely is a chicken welfare issue. GA 4.9 is to a certain extent already captured by planning provisions or regulations. However it is largely determined in planning regulations by numbers of chickens rather than empirical assessment of chicken system practices. This is equivalent to measuring car performance by the volume of its fuel tank.
11. The section on Facilities and Equipment again lacks clarity against a farming system and also lacks defining numbers eg maximum chickens per feed pan or water point. Water nipples should be preferred over open water for bio-security and disease issues. Clean out and sanitation frequency of a most basic nature should also be stipulated.
12. The section covering Temperature and Ventilation has been in part covered above. However this section in the Draft appears to be written entirely aimed at Tunnel / Barn growing systems. But what about temperatures and ventilation controls for more general Free Range caravans where chickens can be confined for many hours at higher density often with poor ventilation, no cooling and no alarm systems.

The above comments may appear broad but they need addressing in some detail. The guidelines / standards must cover all systems for chicken meat production.

We wish to be more formally consulted on further development of the Draft which we believe needs major restructuring / reworking.

An invitation is extended to those directly involved in the preparation of the Draft Standards and Guidelines to visit SA to view the operations of a typical 'new' tunnel / barn farm we operate. It may greatly assist with reshaping the document into guidelines / standards more appropriate to the Chicken Meat Industry.