



World Animal Protection Submission on the Draft Australian Animal Welfare Standards & Guidelines for Poultry and associated Regulatory Impact Statement

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About World Animal Protection

World Animal Protection has been protecting animals around the world for over 50 years. Our vision is for a world where animals live free from suffering. We believe good animal welfare is fundamental to a better world, to community wellbeing, to food production and agricultural systems, to the environment, public health and a sustainable global economy.

We work in over 50 countries, moving local communities, companies, NGOs and governments to sustainably change animals' lives for the better. We also act for animals at a global level, using our United Nations consultative status to put animal welfare on the global agenda and have a specific Memorandum of Understanding with the World Organisation for Animal Health (OIE).

To whom it may concern,

Please accept World Animal Protection's submission on the Australian Animal Welfare Standards and Guidelines for Poultry (herein referred to as, and focusing on, 'Standards'). This submission is made on behalf of our many Australian and global supporters, including the more than 15,000 Australians who have added their name to this submission to show their support for our recommendations and asks. The welfare of animals on farms is a key concern for World Animal Protection given the number of farmed animals, and the ongoing suffering of many of them caused by severe confinement, barren environments and painful procedures.

Our comments in regard to these standards are guided by the belief that farm animals deserve a 'life worth living' which includes the ability to express natural behaviours and positive mental states, not just the absence of cruel conditions and practices. World Animal Protection agrees with the UK Farm Animal Welfare Council¹ that this should be incorporated into regulatory tools with 'a life worth living' enshrined in minimum standards. This approach must be at the core of the final Standards whose key purpose is *'to deliver clear, consistent and contemporary welfare standards'*.

The current draft Standards do not adequately address the worst welfare issues facing Australian poultry nor facilitate significantly better welfare for them. They ignore substantial bodies of science and major behavioural needs of poultry, which are not currently accommodated by the draft Standards or adequately valued in the accompanying RIS. For example; the draft Standards do not provide basic requirements for enough space for poultry to move and perform key natural behaviours, nor provisions to perch, dust bathe, forage or nest, plus water for ducks nor take into account suitable genetics for meat chickens which enable basic behaviours without pain and suffering. It is essential that fundamental poultry behavioural needs are met by the final Standards.

Two key examples are highlighted here which relate to cumulative whole of life welfare:

Firstly, the systemic welfare impacts of fast growing birds, and benefits of slower growing breeds, are detailed in an attached World Animal Protection literature review (with additional references) while individual and overall welfare impacts of intensive broiler production are quantified in a weighting and scoring approach by Goscik et al, 2016². This paper concludes that an overall balance of improved welfare is most cost efficient in indoor higher welfare systems, including slower growing birds. The welfare cost of the shocking escalation of conventional growth rates and associated health and welfare

¹ Farm Animal Welfare in Great Britain: Past, present and future. FAWC report 2009 p. 18, figure 1 and p.19 Clause 69; '...we now believe that the focus of the Government and livestock industry should move beyond the absence of cruelty and unnecessary suffering and the provision of needs although, of course, they must remain as an absolute requirement whatever the circumstance. We propose that the minimum legal standard should be set at the test of whether a farm animal has had a life worth living.'

² Goscik et al, 2016. Cost efficiency of animal welfare in broiler production systems: A pilot study using the Welfare Quality® assessment protocol. Agricultural Systems 146 (2016) 55-69

implications is reaching global concern and can no longer be ignored in Australia. However, this is essentially ignored in the RIS and flies in the face of the first OIE general principle for welfare and livestock production systems: "Genetic selection should always take into account the health and welfare of animals".

Secondly, there are the systemic, high impact welfare issues caused by severe confinement and barren environments suffered daily by all conventionally caged hens in contrast to the relatively small proportion of non-caged hens possibly experiencing negative impacts. The disadvantages of conventional cages have not been adequately listed in the RIS, nor the full benefit to all hens and the community of non-cage systems. Examples of omitted disadvantages include non-infectious or metabolic diseases such as fatty liver and osteoporosis, plus related issues during harvesting and transport. Welfare outcomes can be quantified on any farm by EU Welfare Quality approaches which have been distilled into Assurewell assessment protocols, with additional benchmarking tools for feather loss (for layers, see Part 2 for details). While these quantitative tools may not have been explicitly applied yet to the Australian industry, the chronic welfare impact of conventional cages has been extensively documented and remains relevant in any location.

The Australian Senate in 1999 recommended a ban on battery cages, based then on decades of scientific evidence. The UK, all European Union nations, several American states and Canada have all regulated for a phase out or ban of conventional cages, and in 2012 New Zealand announced a phase out by 2022. Just last year, the Victorian Government commissioned and released an extensive scientific report by world renowned Bristol University poultry welfare experts that clearly concludes that natural behavior and minimum acceptable welfare standards for layer hens cannot be provided in conventional cages. Several producers in the EU are converting from furnished cages to cage-free systems due to consumer interest in cage free, while the recent retail commitment for cage free is substantial and growing in the US. The consumer future is clearly cage free. Yet only one Australian jurisdiction – the ACT – has banned cages. We strongly encourage Australia to follow suit to ban all commercial poultry cages.

It is also well established that cage free systems in Australia are commercially feasible and that consumer demand for them is growing, with more than 50% of grocery eggs sold now cage free. The pessimistic RIS presumption that this trend may reverse or slow is simply incorrect. In addition, a growing number of major fast food and food processing companies have committed to cage free eggs in Australia or globally. Currently 11 million Australian hens remain in cages supplying an estimated 8 in 10 eggs used in processed products, fast food restaurants, cafes, catering and other restaurants. This is the hidden cruelty that the Standards must confront, and currently at odds with the 84%³ of Australians want battery cages to be phased out and have already voted with their wallets for fresh eggs.

³ <https://www.rspca.org.au/media-centre/news/2017/breakthrough-research-finds-84-australians-want-end-battery-cage>

Poor poultry welfare is an example of regulatory failure in Australia. Failure in enforceable minimum standards, a lack of clear welfare labeling requirements for all poultry products (eg. processed and fast foods, and fresh eggs) and lack of robust regulatory processes. Australian poultry industries remain predominantly self-regulated and have historically been reluctant to voluntarily improve welfare. Enforceable Standards based on science, ethics and community expectation are essential to protect and maintain animal welfare, and community confidence in Australian poultry products.

The current Standards process has been delayed, drawn out, biased and flawed. It ignores community expectations for poultry welfare and well-established science. In addition, the accompanying Regulatory Impact Statement (RIS) makes some concerning key assumptions in terms of definition and welfare, community expectations and majority benefits, and includes some unsubstantiated economic assumptions and market projections. There is no credible evidence that animal welfare reforms in Australia have negatively impacted markets or biosecurity, as claimed in parts of the RIS and recent NSW Government community consultation for the Standards.

Outlining our main submission

The World Animal Protection recommendations in Part 2 are in line with the prevailing science and public sentiment. This is most clearly seen in retailer supply chain decisions and consumer trends with the majority purchasing fresh non-caged eggs and certified higher welfare fresh chicken meat. Our global experience also notes that good baseline welfare regulation supports the introduction and marketing of higher welfare products and generally facilitates market and community benefits via product diversification and choice, added value and more competitive pricing, as well as clarity and consistency of baseline requirements to industry.

Our submission essentially focuses on the Standards (not Guidelines) as the proposed vehicle for minimum legal requirements, though we challenge the implicit assumption that all States will indeed implement the final Standards within their jurisdiction. Experience demonstrates that comprehensive State implementation has not always followed, with several States yet to prescribe earlier Australian Standards for transport, cattle and sheep.

Where scientific review already competently exists, we have referred to this or not repeated it but have provided additional references and fact sheet evidence in support of our submission. In response to the optional questions posed by the RIS, we offer the following guide to information in our submission in the table below:

#Q	Question	Response
1.	<p>Do you agree with the summary list of advantages and disadvantages of layer hen farming systems in Part 2.3.1?</p> <p>Do you think that any advantages and disadvantages are missing from this list? If so, please include them below.</p>	<p>No, this is heavily biased towards conventional systems.</p> <p>Yes, for example Part 2.3.1 does not represent the full range of disadvantages of cages (eg. non-infectious disease, difficulty in monitoring and handling to depopulation etc), community benefits and financial benefits currently conveyed by non-cage systems for laying hens. Genetic/breed related risks are not mentioned for meat chickens which would relate to ~127 million conventional fast growth meat chickens a year who also experience excessive stocking density. See our Submission Part 2 for more.</p>
2	<p>Do you think the risks to the welfare of poultry discussed in Part 2.3.1 are sufficient to justify the introduction of better standards and/or guidelines?</p>	<p>Related to the above, the risks listed in Part 2.3.1 are incomplete as are the community views on such risks conveyed in the RIS. Summary table 14.2 does not mention genetic/breed, handling risks to welfare, nor risks associated with lack of competency, compliance and reporting. More information on the consequences and likelihood (components of risk) are discussed above and presented specifically in our Submission Part 2 as well as challenge to some of the key assumptions and definitions used in Part 2.3.1. Where possible, impact or evidence for impact has been provided. We don't believe the draft standards as currently written convey adequate 'better standards' and call on additional revisions. We firmly think the evaluation of all true</p>

		risks to poultry are justified in truly better final Standards.
3	<p>Which of the above-mentioned areas of risk to poultry welfare do you think are of the greatest concern?</p> <p>Are there any other areas of concern to poultry welfare? Please provide reasons for your answers, together with supporting scientific evidence.</p>	<p>The following systemic risks are of greatest concern:</p> <ul style="list-style-type: none"> • Restriction of behavior and overall negative welfare and a life not worth living for poultry in cages. • Fast growth genetics and high stocking density of meat chickens and turkeys. • Barren environments for poultry, other than laying hens. • Unnecessary mutilations and painful procedures to poultry <p>See our Submission Part 2 for more detail on these and other areas of concern to poultry welfare.</p>
9	Do you think that the net benefits to poultry welfare likely to achieved under Option B , are justified?	No - voluntary guidelines provide no assurance of any net benefit to poultry.
10	Do you think that the proposed national standards under Option C reflect community values and expectations regarding the acceptable treatment of poultry?	No - as noted in this section and in our Submission Part 2 with additional information on community values and expectations. Option C as currently written does not reflect acceptable treatment of poultry.

11	<p>Do you believe that the net benefits to poultry welfare likely to be achieved under Option C, are justified?</p> <p>Would the combination of costs and benefits under Option C be preferable to other options?</p>	<p>No - draft Standards as proposed are inadequate to provide net benefits to poultry. See our Submission Part 2.</p> <p>Not applicable as the estimation of costs and benefits is incomplete and in places is flawed.</p>
16	Which of the Options A, B, C, or combination of one or more Options D,E, F, or G, in your opinion would provide the greatest net benefit for the Australia community?	Modified Standards (see our Submission Part 2) and a combination of options (see below), though we don't necessarily agree that all cost projections are accurate.
17 an 18	Do you have any further information or data would assist in the assessment of the impacts (costs and benefits) expected under each of the options/variations?	Yes, see our Submission Part 2 and attached fact sheets for additional evidence and references.

In summary, World Animal Protection is calling for:

- A nationwide prohibition on cages for all commercial poultry including a phase out of conventional layer cages
- Enough space and provisions for chickens and other poultry as relevant to stretch their wings, forage, perch, dustbathe, nest, fly; to behave naturally
- Slower growing breeds to enable normal development and reduce health issues
- Minimum light intensity to allow normal eye development, movement, health and natural behaviours
- Minimum period of darkness at night so the chickens and all poultry can sleep and natural light during the day
- Specialised vet care and trained staff to regularly assess welfare

- Regular reviews of the Standards and Guidelines so they will always be up to date with the latest science.

Finally, the public expects transparency, full disclosure and an objective RIS. In addition to our concerns above and in Part 2, we believe that the RIS options (A to F) proposed and accompanying economic analysis do not deliver this. They are neither comprehensive in regard to a list of viable and important options, nor accurate in representing the true net industry cost and welfare benefits of some of the proposed options nor always inclusive of the financial benefits to industry when improved welfare is realised.

We know that certain options do not convey the ultimate net benefit to poultry or the community. Option C as currently stands is misleading and does not afford Australian poultry significantly improved welfare as explained in detail in Part 2. Nor do A, B or C reflect community expectation or the greatest net benefit for the Australian community. Australian consumers have voted in the grocery market and spoken in the polls. The RIS fails to include current retail sales trends, total numbers of birds projected to benefit or not with all the various options while industry continues to hide a remaining majority of caged layers, fast growth meat chickens and other suffering poultry in low welfare commercial systems invisible⁴ to the community.

World Animal Protection calls for a significant variation of the current draft Standards with specific recommendations articulated in Part 2, including a phase out and ban of cages for all poultry and provision of nests, perches (or platforms) and litter, minimum light intensity and periods of darkness and maximum stocking density of 30kg/sqm for meat chickens and turkeys, improve handling, and on farm and abattoir killing requirements plus prohibit forced molting, castration, pinioning and devoicing as unnecessary and painful mutilations and all hot blade trimming of layer poultry, given feasible and science based alternatives exist. A step change to truly higher welfare Standards is the only viable approach to satisfy the welfare needs of commercial poultry and preferences of the Australian community. It's time for real change with a higher welfare baseline for commercial poultry in Australia.

⁴ Farm Animal Welfare in Great Britain: Past, present and future. FAWC report 2009 p.127 111. *'The quality of life of farm animals is determined by legislation, husbandry and market demand by the consumer.However, the power of the concerned consumer (through market demand) is mostly unrealised due to the lack of information generally and at the point of sale that allows an informed choice to be made.'*

Sincerely,

A handwritten signature in black ink, appearing to read 'Simone Clarke', with a stylized, flowing script.

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Part Two: World Animal Protection Submission on the Draft Australian Animal Welfare Standards & Guidelines for Poultry

26 February 2017

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Part Two of our submission details specific recommendations and evidence for revised Standards, for sections pertaining to species that represent the majority of poultry farmed in Australia. We advocate for the requirement for enough space and enrichment for a broad range of natural behaviours, prohibition of cages, minimum light and dark periods, and humane handling, on farm killing and slaughterhouse requirements for all species. Please note that we have not compiled extensive scientific reference lists where credible scientific review already exists but offer additional references also in the attached fact sheets.

Part A: General standards and guidelines for all species of Poultry

Recommendations for Standards for this section are of major importance and to enable compliance with the first draft standard (SA1.1): 'a person in charge must take reasonable actions to ensure the welfare of poultry under their care.' World Animal Protection strongly recommends that Part A include additional standards that enable innate natural behaviours of all poultry; ability to move, perch and where egg laying, nest, plus for all but ratites foraging and dust bathing. These behaviours cannot be satisfactorily provided in layer cage systems which we urgently recommend are phased out plus cage systems prohibited for all other species.

SA1. Responsibilities

World Animal Protection recommends that the following must be included as additional elements of SA1:

- *obtaining knowledge of relevant animal welfare laws*
- *understanding poultry behaviour and needs*
- *identifying distressed, weak, injured or diseased poultry, and taking appropriate action*
- *maintaining appropriate records*

SA2.2 Feed and Water

We recommend the modification of the Standards or additional standards:

SA2.2 A person in charge must ensure poultry have access to food at least once in each 24 hour period.

SA2.X A person in charge must check for water supply, twice daily, in summer periods.

SA2.X: Forced moulting is not permitted.

Explanation and evidence:

Access to once daily feeding is essential. Commercial broiler breeders are already severely feed restricted to maintain a commercially productive body weight.

Scientific review concludes increased activity, drinking, stress and hunger related aggression equates overall to poorer welfare associated with skip-a-day (SAD) feeding.ⁱ It is prohibited in UK, Denmark, Sweden and Norway. Precision feeding may be preferredⁱⁱ, though once daily feeding maintained.

With any restricted feeding including SAD feeding, pecking motivation is strongly retained and risks an increase of injurious feather pecking. Instead to truly enable greater daily satiation and behavioural expression of broiler breeders, we strongly recommend that the standards require daily feeding plus in Part B that edible pecking enrichment must be provided (see also SA4 below). This assists to also reduce stress and feather pecking associated with chronic hunger and re-directed natural oral behaviours.

World Animal Protection is opposed to forced molting. Withholding food (or manipulating light) to induce molting leads to significant and rapid weight loss. This demonstrates the needs of these birds are not being met and could contravene the first basic standard of this section. In addition, hunger, frustration, and a significant increase in aggression may resultⁱⁱⁱ. (See also SA9.X and GA2.7 should also be modified accordingly.

GA2.8 – Suitable substrate and enrichment should be added to prevent or reduce abnormal behaviours associated with deprived foraging. See proposed standards SA4.X and SA7.

Quality and nutritive content of concentrated feed alone does not prevent abnormal behaviours such as feather pecking or cannibalism. Safe edible fibre enrichment or suitable scattering of some food in litter enables expression of natural foraging behavior and has been shown to be consistently helpful to prevent or reduce abnormal behaviours. Foraging is a basic poultry need and is particularly important for conventional (fast growth) broiler breeders who experience chronic hunger on a daily basis.

This recommended change would also assist risk reduction and compliance with standard A3.1 in relation to prevention of injury.

SA4. Facilities and equipment

World Animal Protection strongly recommends including the following additional or modified standards to provide all Australian poultry with a life worth living;

SA4.X 'Cages for meat chickens and other commercial poultry are prohibited'

SA4.X 'A person in charge must phase out existing layer and breeder cages.'

SA4.X 'A person in charge must provide poultry with enough vertical and horizontal space available to stretch to their full height and flap their wings; a maximum stocking density of 30kg/sqm is required, reached once during the lifetime.'

SA4.X 'A person in charge must provide poultry from 10 days onwards daily access to species suitable water or dry substrate for dust bathing, suitable facilities on which to perch plus access to facilities for pecking and suitable nests if egg laying.'

SA4.3 'A person in charge must provide suitable outdoor openings that allow birds to maintain a normal posture, prevent obstruction and injury and encourage birds to exit and exercise their natural behaviours, while providing protection from the elements, disease, injury and predators.'

SA4.4 'Poultry should not be raised on wire or slats as the majority flooring.'

Explanation and evidence:

The majority of Australians consider the wellbeing or welfare of animals raised for food as important, demonstrated by over 80% surveyed by Animal Tracker Australia, 2014. Most recent polling found that 84% of Australians (surveyed across the national, geographic and socio-economic distribution) are concerned about hens in battery cages and want a phase out of battery cages. This demonstrates an increasing trend in Australian concern and consumer behavior, with 65% of those surveyed saying that concern over cages impacted their decision to buy or eat eggs⁵.

The draft Standards are inadequate to enable achievement of the objective of this section: 'Facilities and equipment are appropriate to minimise the risk to the welfare of poultry'. They also significantly risk non-compliance with the first draft standard of this section: 'A person in charge must take reasonable actions in the construction, maintenance and operation of facilities and equipment to ensure the welfare of poultry'.

World Animal Protection is opposed to confinement (cages) and barren environments. We refer to considerable science and scientific review^{iv} that highlights the welfare impact of cages and benefits^{vi} of cage-free systems, space and enrichment provisions enabling important natural development and behaviours. Scientific review of the impacts of high stocking density for meat chickens and the benefits of a maximum of 30kg/sqm is found in a dedicated fact sheet and discussed further in section SB2.

Poultry behavior and welfare experts agree that there are fundamental natural behaviours of layers and all breeders: nesting, foraging, perching and dustbathing. When denied the ability to perform these behaviours, it can lead to intense stress demonstrated by repeated pacing, gavel calls, potential egg retention, injurious pecking, and sham dustbathing. This is the case for more than 11 million layer hens currently in Australia still living in barren battery cages. Over the next 10 years, over 200 million layer hens will be denied basic behavioural needs if the final Standards are not improved. Additionally, poor standards will impact 127 million fast growth, barren housed meat chickens.

Caged layer hens currently provide the majority of eggs for processed products. However, consumers are now preferencing cage-free fresh eggs, which now equate to over half of Australian supermarket eggs sold. Cage free eggs now represent the largest value of the egg market and are predicted to grow^{vii}. The majority of consumers (65% of 3000 surveyed across all states by independent Canstar Blue, 2016) are happy to pay more, not support the cage egg industry and agree the eggs are better quality. Only 22% overall, and significantly less than 30% of consumers surveyed in all states purchase caged eggs. Some of these consumers stated they feel guilty about purchasing caged eggs but over 90% of them said they

⁵ <https://www.rspca.org.au/media-centre/news/2017/breakthrough-research-finds-84-australians-want-end-battery-cage> last accessed 14.2.18

would switch to free range eggs if they cost less⁶. The RIS appears to defend the market for the minority (22%) of fresh caged eggs buyers and ignores the growing consumer trend for cage free eggs and public preference for a regulatory direction on battery cages, yet as Canstar Blue concludes from their survey; 'consumers are clear about what they prefer.'

The UK, all countries in the EU, NZ, Canada and some states in the US have banned or are phasing out conventional cages, while the draft Standards are proposing to continue with unabated use. This is at also odds with international market trends, science and retailer policies for cage free eggs⁷ in Australia. In fact, cage free eggs now represent the highest value in terms of grocery sales to the egg industry, and are projected to increase ^{viii}.

Conventional (battery) cages have:

- No nests or provisions for nesting
- No litter substrate for dustbathing
- No substrate for foraging
- No perches or ability to adequately develop and strengthen legs
- No facilities to retreat from other birds, fear, social aversion or injurious pecking
- No space to adequately move horizontally or vertically, wing flap or to fly.
- No solid flooring, usually only wire
- Poor opportunity to inspect and monitor birds
- High rates of non-infectious disease which cannot be managed in cages
- Associated high levels of fractures and processing contamination associated with handling and transport of spent hens

Cages impair bird health and induce higher rates of non-infectious disease (eg. fatty liver, kidney disease, osteoporosis, bone weakness, fractures and lameness) which are then unmanageable in cages and can lead to a range of severe welfare impacts including liver rupture and multiple fractures during harvest. While floor systems can involve higher infectious disease, this can be managed by biosecurity, hygiene and vaccination for example. Europe has demonstrated a consistent decline in a range of infectious diseases (Marek's Disease, parasitic diseases) and notifiable diseases including *Salmonella enteritidis*

⁶See details at <https://www.canstarblue.com.au/food-drink/free-range-vs-caged-eggs-what-consumers-want/>

⁷ Coles home brand no longer sells cage eggs, Woolworths had pledged to end the sale of cage eggs by 2018 though now likely by 2025 and Aldi committed by 2025. In Australia, at least; Subway, Grill'd, Ikea, Mc Donalds, Hungry Jacks, Simplot Australia already or by 2018. Mars and Unilever will also be cage-free eggs by 2020. There are many more businesses committed to cage free eggs: <https://www.rspca.org.au/campaigns/layer-hen-welfare/cage-free-proud> Plus a host of global businesses commit and progress: <https://www.ciwf.com/our-campaigns/eggtrack/> as well as in the US, Brazil, Sth Africa and NZ.

due to better vaccination, husbandry and parasite management since the ban of conventional cages as well as reduced feather pecking and cannibalism with better husbandry and understanding of poultry behavioral needs^x.

We also note that ‘enriched/furnished cages’ do not provide for adequate movement, natural behaviors and social adaptation, with very limited space and provisions for moving, perching and dust bathing which do not accommodate the needs of all birds at one time and provide minimal ability to wing flap or fly to reduce osteoporosis. Inherently it is the restriction of space, movement and behavior that cannot be adequately compensated in any caged systems as the balance of science is now demonstrating. Furnished cages are already prohibited in Switzerland, and will be in Austria by 2020, while a ban is proposed in Belgium by 2024. Any new cage construction in Ohio, the second largest egg producing state in the US, is already prohibited. All retailers in Germany and the Netherlands have now banned shell eggs from caged systems in their stores, plus other food businesses in France. In the EU fast food sector and globally over 100 major companies have made such commitments⁸. The trend away from all layer cages is clear.

We are very concerned by the introduction in the draft Standard that allows for colony or breeder cages for meat chickens and note that the draft Standards do not explicitly prohibit cages for meat chickens. In addition to the above mentioned inherent special and behavior restrictions of caged systems, there are also potential food safety concerns and lower Salmonella levels with litter raised flocks. Also, when meat and laying chickens are housed on wire flooring and without litter, they experience persistent problems with footing and higher rates of foot infections, lameness and frustration without litter for dustbathing. Scientific evidence clearly demonstrates that majority wired or slatted floors lead to greater claw, foot and leg injuries and we recommend these are not permitted as the sole flooring substrate or phased out with existing cages. There is also reduced ability to inspect and monitor birds plus higher risk of heat stress and overheating due to inadequate ventilation in cages. This is an added concern in the Australian context. A review of the welfare of meat chickens and breeders in cages is attached.

Despite an increase in the use of cages in some nations, it is estimated that broiler cages would be likely met with the same level of social disapproval in Australia^x. Breeder cages have also been rejected by some countries and major global retailers including McDonalds and Walmart. Australia would be strongly encouraged not to provide any opening for future broiler or breeder colony cages.

Environmental enrichment aims to provide opportunities for greater expression of natural behaviors and can also lead to improvements in biological function. Effective enrichment may have a substantial positive welfare impact, but without it (barren environments) deprives poultry of key natural behaviours and results in significant negative welfare impacts. A dedicated fact sheet on enrichment is attached, focusing

⁸ <https://www.compassioninfoodbusiness.com/our-news/2016/10/is-europe-ready-for-the-cage-free-revolution>

particularly on the need and benefits to meat chickens. See also SA7 regarding litter and dustbathing and species sections in Part B.

SA6. Lighting

World Animal Protection recommends the following modified or additional standards:

SA6.2 A person in charge must ensure that the light intensity for all poultry is at least 10 lux or 20 Lux for meat chickens and turkeys during lighting periods (measured at the bird level), unless specifically reduced in the event of injurious pecking or catching.

Remove SA6.3

SA6.X A person in charge must provide all poultry (except chicks under 7 days) with a minimum of 8 hours of continuous darkness daily.

SA6.X Enterprises where poultry are permanently housed indoors must have access to equipment to measure light intensities and keep appropriate records.

SA6.X All new facilities must enable natural light for birds from 7 days onwards.

Explanation and evidence:

World Animal Protection asserts there is adequate evidence that low light levels (5 lux) impact eye and sight development in young birds as well as reducing preening, foraging and general activity, leg strength and increasing sitting and contact dermatitis (breast blisters, hock burn and footpad dermatitis) in growing birds, particularly meat chickens^{xixixiiixivxxvi}. Reduced growth, feed intake and breast meat yield has also been found at 5 lux^{xvii}. In addition, low light conditions impair worker welfare and inspection of birds, contribute to floor eggs, fear, feather pecking and cloacal cannibalism in laying or breeding birds.

Birds prefer light levels of at least 10 lux for layer hens and 20 lux for meat chickens^{xviii}, with also a preference for gradation of light at dusk and dawn^{xix}. They are more active (movement, perching, preening and foraging)^{xx} and better stimulated to use enrichment which further benefits leg strength and reduces the risk of contact dermatitis, particularly for meat chickens (see also Enrichment fact sheet). Lameness is also lower, demonstrated with improved gait score^{xxi}. Adequate lighting is also important to reduce injury, abnormal behaviours such as injurious pecking including cannibalism, and mortalities. Both the EU and NZ require a minimum 20 lux light intensity (measured at the bird level) for meat chickens, with NZ requiring a minimum of 50 lux for birds up to 7 days old.

A minimum period of continuous darkness is as a key element of good welfare to enable good diurnal and behavioural patterns, development and health of all poultry. A day length of 16 hours and minimum of 8 hours continuous darkness has benefits in reduced fearfulness, lameness and improved rest,

walkability, leg health and immunity; definitely contributing to good welfare of meat chickens^{xxii}. Natural light also provides a range and changing illuminance, transition of dawn/dusk and encourages greater activity and exploration as well as greater use of enrichment^{xxiii}. We have found solar tunnels/tubes to be effective for provision of natural light without the heat in hot climates, also conveying a cost and electricity reduction over time. Natural light conveys welfare and sustainability benefits and is recommended for new facilities⁹.

SA8. Litter management

World Animal Protection recommends the following as an additional standard:

SA8.X A person in charge must ensure that all poultry housed indoors have access to a suitable littered area to forage and dustbathe that is at least one third of the ground surface area. Accumulated manure does not constitute litter.

Explanation and evidence:

As mentioned in section A4, dry, friable litter is essential to enable dust bathing and foraging as fundamental behaviors for all relevant poultry species^{xxivxxv}, and also serve to improve foot and feather health. Conventional cages or barren floor systems provide no opportunity for these behaviours and furnished cages do not provide enough substrate and space, generating exclusion, stress and frustration in subordinate birds^{xxvi}.

Deprived of a suitable substrate birds display frustration as sham dustbathing, which is incomplete for behaviour and feather health. A lack of foraging may also predispose to gentle or injurious pecking, particularly of layer hens. Deprived of substrates for dustbathing and foraging has a negative impact, while good health, pleasure and satisfaction is derived from dustbathing and foraging. All indoor poultry should have access to good quality litter to facilitate good welfare.

Ideally, a separate substrate is provided for foraging as birds prefer straw, sawdust or wood shavings for this activity, while for dustbathing they prefer sand or soil though oat hulls (in rings on the floor) have recently been demonstrated to provide a good substrate for both behaviours and also encourage more activity and leg strength for meat chickens with no detrimental effects on productivity or environmental conditions^{xxvii}. Rice hulls are a similar substrate of interest and are commonly used in Thailand. Salmonella levels have also been shown to decrease with birds raised on litter (vs cages) in European systems (where litter is not reused)^{xxviii}.

⁹ Global Animal Partnership meat chicken standards v3 require a minimum of 50 lux for all meat chickens, a minimum of 6 to 8 hours continuous darkness, and natural light for new builds: <https://globalanimalpartnership.org/wp-content/uploads/2017/08/UPDATEDGAP-Standard-for-Meat-Chickens-v3.0-FINAL.pdf>

SA9. Handling and husbandry:

World Animal Protection applauds many of the draft Standards in this section (eg. pain relief required for surgical procedures and prohibiting obvious but important gross breaches of welfare such as live plucking and non-veterinarians performing painful procedures). However, we find the section lacking in some areas and recommend the following as additional standards:

Additional to SA9.1 Handling or carrying poultry by one leg, neck or wings must not occur.

SA9.X A person in charge must not perform desnooding, detoeing, toe trimming, despurring, dubbing, pinioning and castration unless for therapeutic reasons.

SA9.X A person in charge may only carry out minimal beak trimming for layer hens, when all other options to reduce feather pecking have been implemented, and infrared methods must only be used.

SA9.X A person in charge must breed poultry with consideration to a positive balance of welfare and production outcomes.

SA9.X A person in charge must provide water up until catching and a maximum of 12 hours fasting pre-slaughter.

Explanation and evidence:

Poor poultry handling incurs welfare and production costs. Inversion of birds (eg. during handling, harvesting and shackling) is stressful, while shackling for slaughter as well as manual handling birds during harvesting by one leg, neck or wings has been shown to be painful and lead to on farm injuries, pain, suffering and deaths during transport. This is compounded in the case of fast growth genetic meat chickens and spent layer hens with osteomalacia which incur higher rates of pain and fractures respectively. On farm handling of poultry has been the issue of significant welfare and media concern in recent years. Also, as depopulation and killing of spent layer hens may now be occurring on up to 75% of farms in Australia (Anwar, 2018 RSPCA Humane Slaughter seminar), there are significant welfare risks posed. Humane handling, including on farm, must be better regulated by the final Standards.

World Animal Protection is opposed to mutilations and painful procedures which incur pain, lasting sensitivity, fear and in some cases the formation of neuromas. Manipulations such as detoeing or toe trimming, dubbing, despurring, desnooding, castration are not routinely necessary and should be banned, unless specifically indicated as treatment by a veterinarian. Pinioning denies painless wing-flapping and should also not be routinely performed.

Beak trimming is a common painful procedure with layer hens and also some male broiler breeders, that causes ongoing sensitivity and pain, as well as the risk of neuromas. It is banned in a number of European countries. When all other efforts to reduce feather pecking are implemented and beak trimming is still

considered important for the welfare of commercial layer poultry, it must be done with the least painful method and for the least proportion of the beak (eg. beak tipping). See also SB 1. Beak trimming is not necessary for broiler production and should be prohibited with alternatives strategies implemented for beak reduction and retreat for other birds. See also SB3.

For scientific comment and recommended standard for stocking density, see SA4 above.

SA10. Humane killing (on farm)

World Animal Protection recommends the following modified and additional standards:

SA.X Humane killing protocols must be documented and employ acceptable methods;
- captive bolt or similar percussive mechanical devices that provide rapid percussive stunning and then bleeding
-cervical dislocation or decapitation for poultry less than 3 kgs
- electrical stunning with adequate current to ensure unconsciousness before bleeding
- gas using carbon dioxide with regulated minimum concentration
- firearm
- immediate fragmentation/maceration for unhatched eggs and day-old chicks.

SA.X Cervical dislocation and manual blunt trauma must not be used for birds greater than 3 kgs body weight.

SA.X Equipment that crushes the neck and methods of cervical dislocation that require spinning or flicking of the bird by the head are prohibited.

SA.X. Gas or electrical methods must be used only with certified training and compliance.

Explanation and evidence:

As on-farm killing of spent layer hens may now be occurring on up to 75% of farms in Australia (Anwar, 2018 RSPCA Humane Slaughter seminar), there are significant systemic welfare risks posed. This impacts many millions of hens annually and so humane killing on farm must be clearly regulated to ensure key standards, competency and monitoring of gas and other humane methods for killing large numbers of poultry on farm. It is completely unacceptable that training and minimum standards are required for slaughtering poultry in processing establishments but not on-farm.

Captive bolt devices (and similar effective mechanical devices) are now available for on-farm killing of a range of poultry. These should be encouraged as the first line for small numbers of poultry killing wherever possible. In addition, cervical dislocation can routinely take a minimum of 30 seconds before unconsciousness followed by death^{xxix}. It is even more delayed and unreliable with heavier birds. Mechanical neck crushing takes even longer, as the blood supply is not effectively stopped and dislocation of the spine does not occur so death occurs due to asphyxiation^{xxx}. Both these methods are

certainly not rendering birds immediately unconscious and thus welfare concerns exist. At a minimal, weight limits for cervical dislocation and prohibition of mechanical crushing must become standards.

SA11. Poultry at slaughtering establishments

The draft Standards are not acceptable and are deficient in a number of areas. We recommend the following as modified or additional standards, noting that additional standards specific for minimum parameters for stunning poultry, dedicated welfare officers and CCTV surveillance are also strongly recommended.

SA11.17 A person in charge must ensure all poultry awaiting slaughtering are provided shelter and ventilation to ensure protection from direct sunlight, radiant and reflected heat, and adverse weather such as rain, wind and high humidity and checked at least hourly.

SA11.X A person in charge must implement CCTV at all critical hazard points to ensure constant monitoring and compliance of poultry before and during slaughter.

SA11.X A person in charge must have contingency plans for stunning which include stopping processing and return poultry to holding/growing areas, second electrical stunner or captive bolt etc.

SA11.X A person in charge must accommodate the shanks of birds of different size and weight without causing undue trauma to the birds during shackling.

SA11.X A person in charge must ensure that if poultry are shackled a breast comforter must be installed from the end of the shackling point to the stunner and be operating in a manner that does not cause injury to poultry.

SA11.X A person in charge must ensure poultry should not be suspended from the shackling line for more than 1 minute for domestic fowl and turkeys before they are stunned.

SA11.X A person in charge must ensure that equipment and procedures for stunning poultry minimize pre-stun shocks and avoidance of submersion into the water bath.

SA11.X A person in charge must ensure effective electrical water bath operation includes:

- Mandatory current for effective stunning is implemented and checked twice daily.*
- Effective earthing*
- Proper adjustment of the water height in the water bath according to the size of the bird*
- Proper construction of the entry ramp to minimize pre-stun shocks and 99% effective stun*
- Correct immersion of the birds in the water ramp*
- Proper adjustment of the voltage and amperage to the age and size of the bird.*
- Stunning parameters must be recorded.*

For controlled atmosphere systems (which can include low atmospheric pressure stunning):

SA11.X The module unloader should be checked at the end of each batch of birds to ensure no birds have fallen to the floor or are trapped in the loader unit. Fallen or trapped birds should be either placed into the gas stunning unit's entry point or, if injured, immediately killed.

SA11.X A person in charge must ensure that poultry are not subjected to the gas mixture until the correct concentration has been reached. Stunning parameters must be recorded.

SA11.X A person in charge must ensure that gas stunning units have windows or other surveillance to allow observation of the birds to verify that the gas mixture is rendering birds insensible with minimal distress.

SA11.X A person in charge must ensure bleeding out is not conducted until birds are confirmed dead; as a guide times prior to immersion for scalding or prior to plucking must not be less than 90 seconds for domestic fowl and 2 minutes for turkeys.

Explanation and evidence:

World Animal Protection advocates against inversion and shackling and advocates for pre-slaughter stunning and specifically Controlled Atmospheric Stunning (CAS) methods, currently and wherever possible, for poultry. An evolving body of science highlights the welfare issues associated with live shackling of birds, pre-stun shocks and poorly implemented electrical stunning systems. Meanwhile, automated loading and CAS is increasingly common in the UK and Europe and gaining application elsewhere. Novel systems of Low Atmospheric Pressure Stunning (LAPS), conveyor body support^{xxxi} to improve the shackle line^{xxxii} or head only electrical stunning (latter two for halal market needs) are emerging technologies that convey additional welfare benefits^{xxxiii}. LAPS offers very promising potential and has been used commercially in the United States for two years and is nearing EU approval.

In an attempt to quantify the welfare impact, for example, with electrical water bath stunning, a majority of birds may wing flap in distress if not supported adequately during shackling, and up to 10% of meat chickens^{xxxiv} have been estimated to experience pre-stun shocks while this may be much higher in turkeys and geese. Pre-stun shocks may result in a range of haemorrhages and clavicle fractures. There is also 100% risk of no pre-slaughter stunning if birds are not fully submerged, while effective individual current can be variable for submerged birds. These examples all have significant consequences also on meat quality. Mandatory minimum parameters for electrical water stunning baths (eg. current) and CAS systems plus checking for unconsciousness must be implemented in these standards. There are also a range of basic unloading, lairage, shackling and stunning requirements plus dedicated animal welfare officers that are required in many countries for poultry slaughter that are not included in the draft Standards for

Australia. It should also be noted that 'industry animal welfare standards'¹⁰ for livestock processing establishments do not include poultry.

The final Standards impact hundreds of millions of birds annually in Australia. A large proportion of these could suffer severely and unnecessarily if better basic welfare standards are not required before and during slaughter. In addition, Australia has witnessed a number of known cases of animal abuse in abattoirs recently, and more are likely to occur undetected. Mandatory implementation of CCTV and regular monitoring of footage to prevent abuse and ensure compliance with specific welfare standards is now essential. CCTV is required in the UK, other countries and retailers, as are dedicated animal welfare officers.

Part B1: Laying chickens.

World Animal Protection rejects standards B1.1 to 1.7 inclusive as we do not support the use of cages for laying hens for the reasons stated in section A. In summary, cages do not enable adequate space, conditions or provisions for fundamental natural behaviours of poultry or opportunities for a life worth living, as supported by substantial science. Europe concluded this more than 20 years ago¹¹ and banned conventional cages.

Core to this principle is the requirement for suitable enrichment for layer hens, with a plethora of supportive evidence existing. There are newer concepts like 'dark brooders' for layer chicks which appear to contribute to reduced fear, aggression and feather pecking (and also could be applied to raising broilers). Excellent practical programmes in collaboration with the UK poultry industry have produced benchmarking guides and practical examples of good layer enrichment¹² that can provide support to include additional guidance to the standards proposed. Effective enrichment that is safe, practical for staff, suitable and stimulating for natural behavior and ultimately well used provides a key relatively low cost opportunity for enabling positive affective states and a positive overall welfare outcome.

Cages are neither ethically sound nor the future of commercial markets. Finally, conventional cages do not reflect the overwhelming public sentiment and scientific evidence that laying hens are sentient, have key behavioural needs and cognitive abilities, some equivalent to aspects of a seven-year-old child^{xxxv}, in

¹⁰ Available at www.amic.org.au and referred to by various retailers eg. Aldi Australia <https://corporate.aldi.com.au/en/corporate-responsibility/resources/animal-welfare/>

¹¹ The European Scientific Veterinary Committee concluded in 1996 that the welfare conditions of hens kept in conventional cages are inadequate, and their needs cannot be met in conventional cages. The Council Directive 1999/74/EC stipulated that the highest possible standards should therefore be introduced to improve conditions, and that barren conventional cages be prohibited as of 2012.

¹² Assurewel featherloss benchmarking tool, Featherwel, Hennovation: <http://www.assurewel.org/layinghens/howisyourfeatherlossmeasuringup> <http://www.featherwel.org>

terms of reasoning and logical inferences. Ultimately the Australian public recognizes that laying hens deserve a life worth living not a life caged and restricted.

We strongly recommend the following standards in line also with Part A with additional guidelines to facilitate practical implementation and compliance;

SB1.X A person in charge must phase out existing cages for laying hens. All new facilities must provide cage free systems.

SB1.X A person in charge must provide a routine lighting system with a minimum of 8 hours continuous light and a minimum of 8 hours continuous darkness during a 24 hour period. All new facilities must integrate natural light.

SB1.X A person in charge must provide light intensity measured at bird height across the facility during the light period averaging no less than 10 lux.

SB1.X A person in charge must provide suitable litter no later than 3 weeks of age for all birds with a minimal coverage of one third of available ground space. Accumulated manure is not considered litter.

SB1.X A person in charge must provide access to clean, enclosed nest boxes with a suitable floor substrate (not wire or plastic coated wire) for all laying hens.

SB1.X A person in charge must not use electric wires to train or control birds.

SB1.X A person in charge must provide access for birds to suitable perches or platforms at all times.

SB1.X A person in charge must provide suitable enrichment to enable normal exploratory and pecking behaviour to reduce the risk and incidence of injurious pecking.

SB1.X A person in charge must provide suitable ramps between tiers to prevent keel damage and related injury in multitier systems (eg. aviaries).

SB1.8 A person in charge must not exceed a stocking density of 30kg/sqm (measured as bird density in the useable area) for rearing laying pullets and for managing adult laying chickens.

Part B2: Meat chickens

World Animal Protection strongly recommends the following standards;

SB2.1 A person in charge must ensure that lighting intensity must be a minimum of 20 lux and lighting patterns must encourage activity and provide a minimum period of 8 hours of continuous darkness each day except on the day of pickup (meat chickens) and meat chickens during very hot weather.

SB2.2 A person must not routinely undertake surgical procedures, such as beak trimming, on meat chickens.

SB2.3 A person in charge must not exceed stocking density of 30kg/sqm during the lifetime of the meat chickens.

SB2.X A balance of welfare and production must be taken into consideration when selecting meat chicken genetics.

SB2.X A person in charge must provide suitable litter substrate for all birds to enable foraging and dust bathing. Accumulated manure is not litter.

SB2.X A person in charge must provide suitable enrichment to poultry from 10 days of age to promote improved leg strength and natural behavior.

SB2.X Cage systems are not permitted for meat chickens.

SB2.X New facilities must include natural light.

It is generally accepted that most of the welfare problems suffered by conventional meat chickens are caused by genetic factors, environmental factors including stocking density (SD) and the important interactions between them^{xxxvi}. However, the RIS is essentially silent on the welfare and waste impacts and trends of conventional fast growth genetics, which remains at odds with the first OIE general principle; “Genetic selection should always take into account the health and welfare of animals”.

As summarized in Part One, high SD has a direct impact on welfare by reducing movement, resting, increasing stress, manure and altering behaviour and indirect impacts via reduced litter and air quality, increased skin, leg and carcass pathologies.

There is ample scientific evidence establishing a wide range of welfare and related production problems associated with fast growth genetics and/or high SD including;

- poor leg development leading to defects, weakness, pain, inactivity, lameness and culling;
- comparative under development of heart, circulatory and respiratory systems leads to exercise intolerance and inactivity, panting, heart and lung failure, ascites and sudden death syndrome
- metabolic challenges and overcrowding that leads to footpad dermatitis, hock burn and breast blisters, as well as restricted movement, resting and natural behaviours.
- excessive stress and impaired immunity and environmental conditions contribute to social aversion, altered behavior, increased susceptibility to disease and injury as well as carcass bruising and mortalities.
- Associated high ammonia and dust levels also compound many of the above outcomes, as does additional heat stress, poor light/dark regimes and barren environments.

- Reduced carcass quality, condemnation and increased losses and cost

Substantial additional references, in two dedicated fact sheets attached, support these concerns and convey the welfare and production benefits of slower growth genetics and stocking density at a maximum of 30kg/sqm, regardless of ventilation system. The draft Standards are also silent on the practice of 'thinning' which should be minimized to once only, if not prohibited. Thinning conveys a possible breach in biosecurity, risks the introduction and transfer of *Campylobacter* and causes stress to birds involved.

The vast majority of Australian meat chickens are of conventional fast growth genetics and thus impacted by growth rates that are unsustainable for balanced development, normal behavior and meat quality. Fast growth genetics fundamentally leads to poor skeletal and organ development, produces an unnaturally structured and behaving bird, hindering walking ability, reducing health and quality of life^{xxxvii}. These birds have reduced activity from 3 weeks onwards and experience reduced ability to move without pain and discomfort, let alone perform other natural behaviours particularly at market weight. They experience higher rates of lameness and mortality than slower growth genetics. Chronic hunger is also experienced by all broiler breeders.

Muscular dystrophies (such as white striping, woody breast) are the most recent finding of fast growth, highlighting this unnatural determination. Extreme selection for high breast yielding birds, which has led to now 20% of weight concentrated in the breast, further impairs stature, movement and natural behavior and has been shown to be associated with these syndromes of muscle degeneration and fat or fibrous deposition. The impacts have been found and estimated in the US and Europe, and likely exist also in Australia to some degree.

Globally and in Australia, there is also increasing demand for higher welfare for meat chickens. While a large proportion of Australia's conventional broilers are now produced to RSPCA Approved Farming Scheme standards, these meat chickens still suffer due to the impacts of fast growth genetics. There are now slower growth breeds recommended by RSPCA UK and produced by both global breeding companies, and more being developed and assessed by University of Guelph. Major companies are beginning to commit to slower growth breeds, amongst other welfare asks.

The need and benefits of litter, minimum 20 lux light intensity, 6 hours of continuous darkness, good environmental conditions and general facilities for enrichment have been mentioned earlier in this submission. Suitable broiler enrichment, perches and more recently platforms^{xxxviii}, has been shown to increase broiler leg strength and activity, reduce fear, contact dermatitis, lameness and culling due to lameness and improve the range of natural behaviours and adaptability. Enrichment must be well designed so well used and different enrichment serves different needs and activities. Physical challenges (eg. from fast growth genetics and leg deformation/weakness) inhibit greater perch use, yet the motivation persists, as seen by comparably more birds using platforms. ^{xxxix}Combined with slower growth genetics and access

to natural light, increased perching (and platform use) would be expected in commercial settings as in organic systems.^{xl} A dedicated fact sheet on enrichment for meat chickens is attached.

Finally, as mentioned in Part One, cages do not enable meat chickens to perform natural behaviours and prevent a range of health, welfare, food safety and monitoring concerns. Given the community views on layer cages, it would be extremely unlikely cages for broilers would be supported by the Australian public and should be prohibited.

Part B3: Meat and Laying Chicken Breeders

World Animal Protection strongly recommends the following modified and additional standards with additional guidelines to facilitate compliance:

Remove SB 3.1, 3.2, 3.3, 3.4, 3.7 and 3.8

SB3.5 *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 6 hours of continuous darkness in each 24-hour period.*

SB3.6 *A person in charge must ensure meat and laying chicken breeders are not be lifted or carried by the head, neck, wings, feathers or tail feathers but fully supported by the breast.*

SB3.9 *A person in charge must not exceed a stocking density of 30kg/sqm (measured as bird density in the useable area) for pullets and adult breeding chickens.*

SB3.10 *A person must not routinely undertake stressful interventions, such as toe clipping or trimming, desnooding or dubbing on chicken breeders. These must only be performed if for therapeutic need and then conducted with pain relief by a veterinarian.*

SB3.X *A person in charge must phase out existing cages over an agreed period and replace with cage free systems for breeders. All new facilities must provide cage free systems.*

SB3.X *A person in charge must provide a routine lighting system with a minimum of 8 hours continuous light and a minimum of 8 hours continuous darkness during a 24 hour period. All new facilities must integrate natural light.*

SB3.X *A person in charge must provide light intensity measured at bird height across the facility during the light period averaging no less than 10 lux. See also SA6 above.*

SB3.X A person in charge must provide litter no later than 3 weeks of age for all birds, to enable at least one third of all birds to forage and dust bathe at any one time. Accumulated manure is not considered litter.

SB3.X A person in charge must provide access to clean, enclosed nest boxes with a suitable floor substrate (and not wire or plastic coated wire) for all laying hens.

SB3.X A person in charge must not use electric wires to train or control birds.

SB3.X A person in charge must provide access for birds to suitable perches or platforms at all times.

SB3.X A person in charge must provide suitable enrichment with edible substrate to enable normal exploratory and pecking behaviour to reduce the risk and incidence of injurious pecking.

SB3.X Beak trimming is prohibited.

Explanation and evidence:

Breeder birds have similar behavioural requirements as layer hens, though experience additional stress of forced matings and chronic hunger of broiler breeders associated with fast growth genetics. The need for adequate space to escape male breeder aggression, edible enrichment to enable pecking/foraging and some alleviation of hunger and slower growth genetics to metabolically reduce that hunger become extremely important for these birds on daily food restriction their entire adult life. Skip-a-day feeding as discussed in Part One, is not considered good welfare practice and does not address the underlying issues of chronic hunger and behavioural need to forage.

Additionally, suitable enrichment which offers opportunity for retreat and perching (particularly roosting at night) conveys further reduction in stress and opportunities for natural behavior, without impairing production^{xli}. High stress, male aggression and forced matings have been shown to impair production and contribute to female breeder feather loss. The commercial trialing in the US of retreat enrichment (panels used in the mating area) conveys additional benefits with increased egg production.^{xlii} Such enrichment would also assist other efforts to avoid beak trimming of males, where this occurs. For example, in Germany beak trimming of males will become prohibited and Poland already avoids this painful procedure. Strategies that enable beak reduction (stones) and retreat for other birds can be implemented.

Nests are also essential to breeder behavior and assist to reduce the risk of floor eggs. Non-caged floor systems offer space and opportunity to provide this enrichment and a more suitable environment for breeder chickens (as long as not majority slats or wire). Such housing has been shown to be commercially productive in many countries.

Breeder birds experience additional welfare impacts with osteoporosis and are highly susceptible to fractures during depopulation. Good handling is essential as is proposed in Part One.

Part B4: Ducks

The importance of open water to ducks is outlined in scientific evidence. Open water is essential for natural behaviours of ducks including head dipping, wet preening and reduction of lipid accumulation, wing rubbing and wing shaking and when deprived can lead to frustration and a range of abnormal behaviours.

World Animal Protection recommends an additional standard:

SB4.X A person in charge must provide water to allow ducks to dip their heads under water and wet preen, and to clean their eyes and nostrils.

Part B12: Turkeys

Excessive stocking rates and wire based or slatted floors are of concern in the draft standards for Turkeys, for similar reasons as mentioned in prior sections. Minimum light intensity should also apply for turkeys.

World Animal Protection recommends the following additional standards:

SB12.X A person in charge must provide partial floor area that is solid for adult turkeys, in case of adult breeding stock, the whole of the floor area should be solid.

SB12.X A person in charge must provide a minimum light intensity of 20lux during light periods.

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