



# Proposed Draft Australian Animal Welfare Standards And Guidelines For Poultry

Submission from the  
Australian Veterinary Association Ltd



24 February 2018

## Introduction

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9000 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the AVA.

This document outlines the AVA's response to the "Proposed Draft Australian Animal Welfare Standards And Guidelines For Poultry" (the Draft Standards) released for public consultation in November 2017.

Feedback for this response has been obtained by consulting with a range of AVA members, including those in the AVA's Animal Welfare and Ethics special interest group (AVAWE), Queensland Division animal welfare sub-committee, and the Commercial Poultry Veterinarians special interest group (CPV).

## Summary:

The AVA welcomes a review of the *Model Code of Practice for the Welfare of Animals - Domestic Poultry 4<sup>th</sup> Edition, 2002* (the Model Code) and its conversion into Standards and Guidelines format. In the interests of poultry welfare, it is important that we work towards development of enforceable standards that can be adopted in a nationally consistent manner.

However, at this stage we feel there are a number of areas in the Draft Standards that need further work. We are not convinced that the Draft Standards reflect community expectations with regard to recent advances in poultry welfare science and recent innovations in technology. We are concerned that some sections of the Draft Standards have little or no change from the 2002 Model Code, despite advancements in poultry welfare science since that time.

Poultry veterinarians have a significant role in ensuring that the welfare of poultry is maintained. We would like to see more emphasis on the benefits of involving veterinarians in decisions about poultry health, welfare and management, throughout the document.

## General comments

There is a dissonance between the preamble and the body of the Draft Standards, particularly in relation to caged layer housing. In the Introductory section, under "Principles for Poultry Welfare", it is stated that:

*"Good husbandry principles that also meet the basic physiological and behavioural needs of poultry include:*

- *space to stand, lie and stretch their wings and limbs and perform normal patterns of behaviour, and*
- *Innovative husbandry and housing systems which enhance bird welfare should be encouraged, and applied to commercial egg farming as practical.*

However the Draft Standards provide for conventional layer and breeder cages that have the same cage floor area requirements as specified in the Model Code. Further, stocking rates and standards for management of the outdoor area in free range systems have not been addressed in the sort of detail that we believe is necessary to ensure good welfare and consistency of outcomes from different free range facilities.

The AVA policy on Commercial egg production systems, whilst recognising that there are advantages and disadvantages with all of the current systems, does state that they *“should provide for the health, nutrition, and psychological well-being of the hens”*.

The AVA policy also calls for regular review of standards, and that they should be updated according to new scientific evidence.

There is now good evidence that conventional cages do not provide scope for hens to perform normal patterns of behaviour, and as such, according to the Principles of Poultry Welfare described above, cannot meet the “behavioural needs” of poultry. However this needs to be balanced against the evidence that cages provide other advantages (such as reduced disease) compared with non-cage systems.

In light of this, it is recommended that the review process and any proposed standards should better address alternative cage systems, such as furnished and colony cages.

The ‘Farmed Bird Welfare Science Review’ released by Agriculture Victoria in October 2017, states:

“The conventional cage (CC) system prevents birds from performing basic movements essential for good health (walking, wing stretching), and denies birds the possibility of expressing their behavioural needs to roost, nest and forage, or their motivation to dust-bathe, due to an inherent lack of resources.” (p.59)

“The general benefits of cage systems (such as reduced contact with faecal material, parasite load, infectious disease and relatively low mortality) are largely equalled or surpassed in furnished (enriched or colony) systems (FC). Immune function appears to be suppressed in hens housed in conventional cages compared with hens in FC systems, and levels of aggression are higher in CC systems. The welfare problems associated with conventional cages are substantial, and their benefits can be achieved in other cage systems.” (p.59)

“The FC system permits laying hens to perform a broader range of behaviours than the CC. Comfort movements, nesting and roosting can all take place at a rudimentary level although it is likely that behavioural needs are not fully satisfied in this system. Hens in FCs are not able to fly, and foraging and dust-bathing opportunities are limited. Mortality in modern furnished cages is lower than in any other system. Birds in FCs have stronger bones than birds in conventional cages, a lower prevalence of injury during depopulation than hens from CCs, and a lower incidence of keel bone fractures during the laying period than hens from non-cage (NC) systems. The welfare problems associated with FCs are significant but these could potentially be reduced by lower stocking rates and improved provision of foraging and dust-bathing areas. A spatial allowance of at least 750 cm<sup>2</sup>/bird is required to ensure bird welfare. The health of birds in FCs is, on average, higher than that of hens from NC systems where far greater variation occurs.” (p. 60)

Given the science available, we feel attention to alternate cage systems is warranted as part of this review process.

The AVA is pleased to see the emphasis on good husbandry and the designated roles of the responsible person. Without good stockmanship and management, adequate staffing and an appreciation of the needs and welfare of confined birds, even the best infrastructure will fail to deliver good welfare.

We would like to see stronger requirements for industry to move toward genetic selection of birds which are suited to the husbandry conditions. Examples are selection of breeds less likely to feather peck and require

beak trimming, slower-growing broilers to reduce heart failure and lameness, and lines of bird that show reduced fear of humans to decrease distress and injury during handling.

Induced moulting is not supported, as it is considered too high a welfare impost to justify its continued application. It is especially of concern for caged hens, as they cannot compensate by expressing their motivation to eat (i.e. by foraging).

The public is becoming increasingly aware that free range eggs, despite the increased cost, are not always produced in the systems that were initially envisaged. Potential issues include lack of provision of shade and protection from predators, highly variable stocking densities in the outdoor area, lack of ground cover and access to foraging materials, inadequate shed openings for easy ingress and egress, and inadequate hours of access to the outdoor range. Excellent management of these systems is key to optimising health and welfare. As such there should be more specific standards associated with management of free range systems, rather than only guidelines which are not enforceable (see later specific comments).

Access to water for ducks is another issue raised by many of our members. The standards are an improvement in that water must be provided in a form that allows head dipping or misters/showers for preening. However ducks prefer full immersion in shallow water and a separate clean drinking source. It is acknowledged that this presents challenges in facility design and biosecurity, as well as the risk of foot problems from wet litter. Overseas some of these barriers have been overcome. We would support future resources being put into better designed facilities for ducks so that they can meet their behavioural needs for immersion, but without compromising biosecurity and health outcomes.

There should be a standard for Ducks requiring that a person MUST NOT force feed for any reason, including pate production (as for Geese SB 6.1).

## Specific RIS comments

**Option A** (status quo) – this is not supported. The Model Code is long overdue for a review based on contemporary animal welfare science.

**Option B** – we do not see value in voluntary guidelines that cannot be enforced. Australia needs nationally-consistent, enforceable standards to drive continuous improvements in poultry welfare.

**Option C** – we do not support implementation of the proposed standards as currently drafted, as parts of the draft fall short of expectations that they will drive improvements in animal welfare.

**Option D** - the science shows that important behavioural needs cannot be met in conventional cage systems. A review of alternative caged systems would help to inform the development of the Standards.

**Option E** - Stocking densities should be based on the available evidence for best welfare outcomes.

**Option F** - Poultry have strong motivation to forage, stretch, nest and roost. Provision of enrichment to meet these important behavioural needs is supported.

**Option G:**

Castration and devoicing should be banned for commercial poultry. These procedures should only ever occur in individual (non-commercial) poultry if well justified on animal welfare grounds, and only performed by veterinarians using appropriate anaesthesia and analgesia.

Pinioning – may prevent injury in Pheasants and so should only be permitted in Pheasants if justified on animal welfare grounds.

Hot blade beak trimming in hatcheries – infra-red at day old is preferred

Routine 2<sup>nd</sup> beak trim – AVA position is that beak trimming must be minimal, at the earliest possible age, and only if pecking and cannibalism is unable to be controlled by other means. Other management procedures that reduce or remove the need to beak trim are strongly encouraged (e.g. genetic selection, feed modification, management of stocking density etc.).

## Additional comments on specific standards & guidelines

SA 3.2 – inspection must be at least twice daily to ensure appropriate welfare

SA 3.3 – a specific time frame for action should be included here, where poultry are found to be sick, injured or diseased. Advice should be obtained from a veterinarian.

GA 4.5 – there is not agreement that radios in shed are good welfare. We suggest this be removed.

GA 4.18 – Access to outdoor areas – these dot points should all be Standards. There should also be a standard which requires that the birds have access during daylight hours for a minimum of 8 hours (unless adverse weather or serious disease outbreak)

GA 5.1 – Management of the outdoor area - as above, these dot points should be standards. Change the second dot point requiring palatable vegetation, to a requirement to maintain adequate vegetation coverage of the ground. As for GA 4.18, a minimum duration of access (8 hours) during daylight hours should be set as a standard.

GA 5.2 and 5.3 should be standards. The provision of overhead protection, hedging, and other features that make poultry feel safe and able to move over the range, is important to ensure birds don't gather at the openings, and stress is minimised while outdoors.

SA9.1 – reword to say: a person must manage and handle poultry in a manner that prevents pain and injury, and minimises stress.

SA 9.4 and 9.6 – see comments above with respect to induced moulting.

SA 9.8 – see comments above with respect to RIS Option G - castration, devoicing and pinioning.

SA 9.10 – The AVA generally does not support surgical alteration to animals unless it is for their welfare. A change in breeder facility infrastructure and management is preferred to avoid the need for these procedures.

SA 9.14 and 9.15, and GA 9.15 – beak trimming – see comments above with respect to RIS Option G.

GA 10.5 – this must be a standard. Crushing the neck, or spinning or flicking the bird by the head is not humane, and it is not appropriate that this is only a guideline.

GA 11.2 – poultry in holding areas. This should probably be a standard, and the frequency of checking should be at least every hour, and even more frequently in hot weather.

### **B1 Laying chickens**

SB 1.6 – 1.7 – as commented above - the minimum cage floor area for caged layers has not been revised since the 2002 Model Code. This does not seem to reflect the evidence that birds need more room to perform natural behaviours, nor likely to meet the concerns of the community.

GB 1.21 – 1.26 – Outdoor area – these should be standards. A minimum duration of access to the outdoor area of 8 hours during daylight hours, should be stipulated.

## **B2 Meat Chickens**

GB 2.3 and GB 2.4 – there should be similar standards for the outdoor range for meat chickens, as described above for layers.

## **B3 Breeders**

SB 3.8 – 3.9 - as commented above - the minimum cage floor area for caged breeders has not been revised since the 2002 Model Code. This does not seem to reflect the evidence that birds need more room to perform natural behaviours, nor likely to meet the concerns of the community.

## **B4 Ducks**

SB 4.2 and 4.3 – the AVA does not have a specific policy on bill trimming in ducks, however our policy principle on surgical alteration to the natural state of animals generally supports only those procedures that are to benefit the welfare of the animals.

We support SB 4.2 – that bill trimming must not be done routinely.

We suggest that GB 4.2 become a standard – i.e. that bill trimming must only be carried out in exceptional circumstances if essential to reduce damage and suffering in flocks.

GB 4.8 – if groups can be picked up by the necks, then SB 4.1 should apply – i.e. supported by the breast.

SB 4.4- access to water – see comments above - we would support future revisions and resources being put into better designed facilities for ducks, so that they can meet their important behavioural need for immersion, but without compromising biosecurity and health outcomes.

NOTE: There should be a standard for Ducks requiring that a person MUST NOT force feed for any reason, including pate production (as for Geese SB 6.1)

## **B5 Emus**

- there should be a standard requiring appropriate shade provision for Emus

## **B8 Ostriches**

- SB 8.1: Suggest rewording to: If the bird has difficulty rising or walking and has significant heat, pain and swelling, veterinary advice must be sought or the bird must be humanely killed
- there should be a standard requiring appropriate shade provision for Ostriches
- There is no mention of housing density for ostrich chicks

## **B11 Pigeons**

GB 11.9 - we query why an exception has been made for birds housed in rural and semi-rural areas.

## **B 13 Turkeys**

There should be outdoor standards for free range Turkeys in the same way as described previously for layers and meat chickens.

**Contact:**

Dr Melanie Latter

AVA Head of Policy and Advocacy

[Melanie.latter@ava.com.au](mailto:Melanie.latter@ava.com.au)