

# Public Consultation for Australian Animal Welfare Standards and Guidelines- Poultry

## RIS Questions

Specific public consultation questions related to the Regulation Impact Statement (RIS) have been drafted by the independent RIS consultants and approved by the Office of Best Practice (OBPR). These questions **are located throughout the main body of the RIS and have been extracted below for your convenience.**

Views and advice are sought in providing information or data that would further assist in the assessment of the impacts (costs and benefits) expected under each of the RIS options/variations. The questions are requests for additional information, requests for reader opinions or value judgements, and requests related to the selection of a preferred option or group of options.

Q1, Q4, Q6 and Q17 are requests for additional information about the problems addressed by this Consultation RIS, to inform the subsequent Decision RIS.

Q2, Q3, Q5, Q7 and Q8 are requests for reader opinions or value judgements about the problems addressed by this Consultation RIS.

Q9, Q10, Q11, Q12, Q13, Q14, Q15 are requests related to the selection of a preferred option or group of options.

**Please note:** The questions are optional and don't have to be answered to make a submission, you can do this separately or in conjunction with answering all or some of the below questions. It is suggested you have a copy of the RIS in front of you whilst answering the below questions to help with context.

Public consultation questions on the Poultry Welfare Standards Regulation Impact Statement, drafted by the independent RIS consultants and approved by the Office of Best Practice.

Oct 2017

## RIS PUBLIC CONSULTATION QUESTIONS

**Date:** February 26, 2018

**Name:** Baiada Poultry Pty Limited

**Contact information:** Dr Sheridan Alfirevich, National Technical and Animal Welfare Manager

Baiada is an Australian owned family business specialising in the production of high quality poultry products under the Steggle and Lilydale free range brands.

Baiada operates a national, fully integrated poultry business for both meat chickens and turkeys. Operations include meat chicken, layer chicken and turkey breeding farms, hatcheries, feedmills, meat chicken and turkey growing farms and processing facilities. We acknowledge and embrace our responsibilities with respect to poultry welfare by ensuring that we adopt and support farming and processing practices, which promote the best possible animal welfare outcomes. We strive for continuous improvement and regularly adopt new practices and innovative technologies with aim of being industry leaders, especially with respect to poultry welfare.

Baiada is fully supportive of the review of the existing minimum welfare standards for poultry, which has cumulated in the proposed draft Australian Animal Welfare Standards and Guidelines for Poultry being released for public consultation. We welcome the opportunity to comment on the draft Standards and Guidelines and are supportive of the process, allowing all those with an interest in poultry welfare, including members of the public, to also comment.

### RIS location - 2.3.1 Risks to animal welfare

1. Do you agree with the summary list of advantages and disadvantages of layer hen farming systems in Part 2.3.1?

No  Yes Comments:

Whilst Baiada does not have commercial laying chicken operations, the list of advantages and disadvantages is considered largely complete.

Do you think that any advantages and disadvantages are missing from this list? If so, please include them below.

No  Yes Comments:

There may be additional considerations with respect to the environmental impacts of the different housing systems other than nutrient run-off to waterways. For example, nutrient deposition into soil, traffic, odour, noise and generation of waste.

2. 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?

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No     Yes    Comments:

**Yes:**

**1. Lack of quantitative lighting standards:**

Although current lighting programs are considered consistent with the proposed new standards, better clarification and strengthening of lighting standards is supported.

**2. Need for restrictions on routine beak trimming:**

Whilst routine second beak trimming by hot blade method is not currently required for meat chicken breeders, it is justified for some species of poultry, including turkey breeders, where outbreaks of injurious pecking and cannibalism may result in high mortality and be very difficult to control. Better standards and guidelines to ensure hot blade beak trimming can be performed, when required, by trained and experienced personnel in order to maintain poultry welfare is supported.

**3. Risky litter management:**

Risky litter management is considered to be a risk affecting all poultry raised in non-caged housing systems, where litter is provided. Better standards and guidelines are justified and supported. Whilst all efforts are directed towards maintaining litter in a dry and friable condition, consideration also needs to be given to the practicalities of working litter. A balance needs to be maintained between working litter with machinery and also ensuring that welfare is not adversely affected. Rotary hoeing litter with machinery has the potential to cause smothering, back scratching, increase stress on birds and increase ammonia levels.

**No:**

**1. Inadequate space allowances for poultry (stocking density):**

There are already clear standards, which have been legislated in most states to protect poultry welfare. These standards are considered to be the maximum density standards. There is no evidence to support that there is an ongoing risk to poultry welfare at the current permissible densities to substantiate the need to change current stocking density standards and legislation.

**3. Which of the above mentioned areas of risk to poultry welfare do you think are of the greatest concern?**

Comments:

It is difficult to determine which of the areas identified represent the greatest risk to poultry welfare.

We support the inclusion of strengthened Standards in some of the areas identified as per the answer to Question 2 above.

Are there any other areas of concern to poultry welfare? Please provide reasons for your answers, together with supporting scientific evidence.

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Comments:

1. Bird handling is a risk for all species of poultry – standards relating to handling of meat chickens are not included in the meat chicken section.
2. There are concerns relating to the turkey standards as drafted.
  - Toenail trimming of turkey hens is not permissible under the proposed new standards and guidelines. The ability to trim the toenails of turkey hens needs to be retained in cases where this practice may be justified on welfare grounds. There has been some research conducted in this area but mainly evaluating the impact of toe trimming of heavy toms (Fournier *et al.*, 2015 & Owings *et al.*, 1972). A study was completed more recently in Canada to evaluate the impact of toe trimming of both hens and toms using the Microwave Claw Processor technology, the same technology as what would be used in Australia for this purpose. The trial results were reported online (<https://www.canadianpoultrymag.com/health/turkeys/to-trim-or-not-to-trim-14681>). The conclusion was that that toe trimming is recommended for hens on welfare grounds, despite recognised welfare implications in early life. In the case of toms, toe trimming resulted in the same adverse welfare implications in early life but there was no increase in scratching to justify the procedure and an increase in rotated tibia. Therefore, it was concluded that toe trimming of toms, especially those grown to heavier weights, is not recommended. Back scratching in hens can lead to pain, cannibalism, injury and bacterial infection with resulting increase in mortality.
  - The handling standard for turkeys needs to be revised to make it clearer and ensure birds can be lifted appropriately for purposes of catching and artificial insemination.

**RIS location - 2.4.1 Lack of clarity in standards**

4. In your experience, to what extent do the existing Model Codes of Practice (MCOPs) and related regulations create uncertainty for Industry?

Comments:

The Model Code of Practice has been largely adopted in its current form as the recognised minimum welfare standards for poultry. The existing Code, despite not having been reviewed since 2002, is still considered relevant and applicable with respect to current farming and processing practices. The level of uncertainty is considered minimal. The major risk areas have been consistently regulated, such as stocking densities.

Does such uncertainty vary between different states and territories?

Comments:

Uncertainty is currently not considered to vary between states and territories to extent where any issues are created.

The Model Code has not been updated for some time and this could create some uncertainty, as to the currency of the existing Code. States and territories may be increasingly likely to regulate different areas within their own jurisdictions independent of the content of the guidance documents.

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5. In your experience, how does this type of uncertainty for industry adversely affect productivity? If possible, please provide some case examples. .

Comments:

This does not currently represent a concern.

However, if the new standards are not adopted (in their final agreed form) in their entirety by all states and territories, following the review process, then productivity is likely to be adversely affected. This is a very important consideration in this process.

For example, if stocking densities for poultry were different between states, the result would be an increase in the cost of production in the states with a lower maximum density. This outcome may result in reduced expansion or contraction of business activities in these state/s and result in increased movement of product between states. There may be detrimental commercial flow on impacts on businesses of all sizes in the supply chain.

#### **RIS location - 2.4.2 Excess regulatory burden**

6. Are you aware of any other poultry farming businesses in addition to those given in Part 2.4.2 that operate in more than one state or territory? If so, please list.

No  Yes Comments:

ProTen Limited, Rural Funds Management

7. In your experience, what is the effect of cross-jurisdictional inconsistencies on industry (i.e. even where jurisdictional standards are clear and verifiable)? If possible, please provide some case examples of where additional costs have been imposed on industry as a result of such inconsistencies.

Comments:

We do not have any specific examples.

8. Do you think there needs to be national consistency in animal welfare standards for poultry? Please provide reasons for your answer.

No  Yes Comments:

National consistency is considered vital to the process to ensure that all current facilities remain operational and that productivity is not adversely affected by geography.

Consistency across states and territories also allows for more effective national training programs with clear guidance relating to welfare requirements.

#### **RIS location - 4.2.4 Option B: (non-regulatory option – voluntary national guidelines)**

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9. Do you think that the net benefits to poultry welfare likely to achieved under **Option B**, are justified?

No  Yes Comments:

The new standards and guidelines offer some improvements compared to the existing Model Code and incorporate the findings of recent poultry welfare research. Farming practices also change over time and standards should be periodically reviewed to ensure their currency.

Improvements in poultry welfare could be expected to occur if the new standards and guidelines were voluntary, as has been the case with the existing Model Code.

Would the combination of costs and benefits under **Option B** be preferable to other options?

No  Yes Comments:

Option B is likely to result in improved welfare for all species of poultry for the reasons listed above. States and territories are likely to adopt standards that are considered to represent major risks to welfare and incorporate these into their legislation, as is the case with the existing Model Codes of Practice. They could also reference the new Standards and Guidelines in their legislation in a reasonably consistent manner.

Option C would be preferable to Option B, as national consistency is also an important consideration and outcome of the process and this would be better ensured under Option C.

Option B is preferable to other options (other than C), including Option E. Option E will result in increased costs of production without any guaranteed measurable improvement in welfare. The other options only relate to limited classes of poultry eg. layer chickens. There are aspects of Option G that should also be included in addition to Options B or C, specifically banning of castration, pinioning and devoicing.

#### RIS location - 4.2.5 Option C: (the proposed national standards as drafted)

10. Do you think that the proposed national standards under **Option C** reflect community values and expectations regarding the acceptable treatment of poultry?

No  Yes Comments:

It is difficult to comment on general community values and expectations and how these relate to specific poultry farming and processing practices. The community would be likely to expect clear standards to ensure the welfare of all animals are protected, including poultry. Provided that the new standards and guidelines are scientifically endorsed and subject to review, this should provide sufficient confidence to the community.

Research should be conducted to understand community values and inform this

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question, as diversity in opinion is expected based on a range of socio-economic, cultural and religious beliefs. The public has limited exposure to the poultry industry and are unlikely to be able to make informed decisions with respect to poultry welfare and farming practices. The obvious example is stocking densities for meat chickens, where the public are not accustomed to seeing chickens housed and may not view this favourably. If deciding on what stocking density is appropriate for welfare, the public may be inclined to select the lowest density option without an understanding of poultry farming or how these densities translate into actual space allowances at different ages through the birds' lives.

Meat chickens need to be able to move freely to access feed and water and grow to their required weights and full genetic potential in order to maximize productivity. If stocking densities are too high, this can have an impact on feeder and drinker space, limit their performance potential and result in poor carcass quality. The disadvantages of high stocking densities are well recognised. However, this is not considered to be a concern at the current maximum levels where current welfare indicator tracking, performance statistics and product quality is amongst the best in the world.

11. Do you believe that the net benefits to poultry welfare likely to be achieved under **Option C**, are justified?

No  Yes

Comments:

Option C with the necessary changes, as suggested in the comments section, would ensure nationally consistent standards representing a significant and positive outcome for poultry welfare in Australia.

Would the combination of costs and benefits under **Option C** be preferable to other options?

No  Yes

Comments:

The combination of costs and benefits under Option C is considered preferable to other options and will provide the best outcome for poultry welfare nationally across species. Elements of Option G could be included in addition to Option C to further improve welfare, specifically banning of castration, pinioning and devoicing.

**RIS location - 4.2.6 Option D: (vary the proposed standards [Option C] to include phasing out conventional cages for layer hens)**

12. Do you believe that the net benefits to poultry welfare likely to be achieved with a 10 and 20 year phase out of conventional cages under **Option D**, are justified?

No  Yes

Comments:

Whilst Baiada does not have commercial layer chickens, there are recognised advantages and disadvantages with respect to all housing systems. On balance, there is limited evidence to support the phase out of conventional cages based on the summary list provided.

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Phase out of conventional cages also has the potential to impact on meat chicken breeding programs. At an imported genetic stock level (GGPs), cages are required for individual bird traceability to facilitate genetic selection based on a range of indicators, including welfare indicators and health criteria. Exponential multiplication in meat chicken breeding programs requires that the great-grandparents of millions of broilers are only a small number of imported birds. Therefore, a blanket ban on cages has wider-reaching effects on the meat chicken industry. The current breeding and selection program would be non-viable if cages could not be used for this purpose.

Would the combination of costs and benefits under variations of **Option D** be preferable to other options, either as a stand-alone option or in combination with other options?

No     Yes    Comments:  
No. See comments under Options B and C.

**RIS location - 4.2.7 Option E (vary the proposed standards [Option C] to reduce maximum stocking densities in barns or sheds for layer hens and meat chickens)**

**13.** Do you believe that the net benefits to poultry welfare likely to be achieved under **Option E**, are justified?

No     Yes    Comments:  
Option E is **not** supported because there is no evidence that it will equate to an improvement in welfare outcomes for meat chickens despite the significant cost implications of this change for the industry. It is unclear why 30kg/m<sup>2</sup> was selected for Option E, as this density is also not supported by research to our knowledge.

1. Management factors are considered to be more important than stocking density based on experience and this is also supported by research (Dawkins et al. 2004). Aside from the welfare implications, it is not in poultry companies' best interests to house meat chickens at densities that restrict their movement, as this also impairs their growth and performance, resulting in lost productivity. Footpad and hock dermatitis and breast blisters and dermatitis, if present, would result in considerable financial loss from downgraded or unsaleable product. If these defects were related to density, it would be in the companies' best interest to reduce the density.

Litter management is multifactorial and is usually related to drinkers and drinker management, the quality and depth of the litter material and facilities and ventilation rather than density, at the current maximum permissible levels. These factors are considered more important than density with respect to welfare outcomes, as meat chickens only reach their peak or maximum density for a very short period of their lives. Achieving good welfare outcomes, optimal growth and product quality is consistently achievable at the current permissible maximum stocking densities.

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2. In addition, the Australian climate dictates that circumstances may not be necessarily comparable to the overseas experience with respect to welfare and stocking densities. The Australian climate is much hotter and drier than that of the United Kingdom and Europe where much of the research relating to stocking densities and welfare outcomes has been conducted.

- In Jones et al. (2005), the ability to control temperature and relative humidity were considered to be the most important factors linked to welfare outcomes, more important than stocking densities in the United Kingdom and Denmark at a range of densities between 30-46kg/m<sup>2</sup>.
- In another study by Feddes *et al.*, (2002), at densities of up to 46kg/m<sup>2</sup>, there was no influence on mortality, carcass grading or scratching provided that ventilation and air circulation were adequate.

The housing for meat chickens in Australia is equipped with adequate cooling and ventilation systems to be able to withstand extreme heat conditions. The relative humidity in most areas is considered low, particularly during hot weather, where there is a linear relationship. The cold, damp conditions of the United Kingdom and Europe would not be as favourable or conducive to ensuring optimal litter condition. This in itself may compromise their ability to house meat chickens at higher densities and maintain optimal environmental conditions.

- The Victorian Farmed Bird Welfare Science review reaches the same conclusion with respect to stocking density in broilers. There was no correlation identified between stocking density and mortality or leg deformities and lameness at the current permissible densities. Furthermore, it is concluded that 'stocking density is not a reliable indicator of bird welfare since several studies report no direct impact on footpad dermatitis development'. It is considered that 'with good litter management and effective environmental control is still possible to maintain litter quality under high stocking densities'.

3. Australia is also not unique with respect to stocking densities for meat chickens in fact Australian densities are generally lower than the rest of the world. Stocking densities of up to 42 kg/m<sup>2</sup> for broilers are permitted by the United Kingdom (SN/SC/1386, 2012), United States and Europe (European Commission, 2007). Australia has always accepted the lower density maximum of 40 kg/m<sup>2</sup> and has managed densities successfully.

- Infrastructure has improved considerably over the time since the last Model Code of Practice was formalised. Therefore, it should not be assumed that further density reductions are continuously required to indicate progress for welfare. Industry knowledge and experience in terms of ventilation and management is also constantly improving, enabling better environmental control and ability to better house chickens at higher densities without any negative impacts on welfare.
- If 40kg/m<sup>2</sup> is the legislated maximum density, planners will be

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required to work on a target of lower than 40kg/m<sup>2</sup> to ensure that density is never exceeded. Densities can be exceeded if meat chickens grow faster than projected, farm weights are inaccurate based on sampling factors or error and unforeseen circumstances, including scheduling and processing operations.

We are not aware of any meat chicken research conducted that has concluded that there is a 'direct, negative linear relationship' between stocking density and poultry welfare.

Would the combination of costs and benefits under **Option E** be preferable to other options, either as a stand-alone option or in combination with other options?

No  Yes

Comments:

For the reasons listed above, there is no evidence to support Option E or any reduction in density.

The current densities are considered already lower than the maximum allowable densities for the rest of the world, except for New Zealand. This option will come at significant cost to the industry with no guaranteed improvements for welfare.

**RIS location - 4.2.8 Option F (vary the proposed standards [Option C] to require the availability of nests, perches and litter for all chicken layers in cage and non-cage systems)**

14. Do you believe that the net benefits to poultry welfare likely to be achieved under **Option F**, are justified?

No  Yes

Comments:

We are unable to comment on Option F.

Would the combination of costs and benefits under **Option F** be preferable to other options, either as a stand-alone or in combination with other options?

No  Yes

Comments:

We are unable to comment on Option F.

**RIS location - 4.2.9 Option G (vary the proposed standards [option C] to ban castration, pinioning and devoicing, hot blade beak trimming at hatcheries, and routine second beak trim)**

15. Do you believe that the net benefits to poultry welfare likely to be achieved under **Option G**, are justified?

No  Yes

Comments:

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Castration, pinioning and devoicing should be banned, as per the standards in the existing Model Code.

**Meat chicken breeders – routine second beak trimming by hot blade method**

In the case of meat chicken breeders, routine second beak trimming by hot blade method is not currently required. However, genetics and behavioural factors may change over time and the ability to hot blade beak trim must be retained. Preventative hot blade beak trimming is justified on welfare grounds to reduce mortality and the severe consequences associated with injurious pecking and cannibalism in some types of birds.

Hot blade trimming performed in the first week, as an alternative to infrared treatment, also needs to be retained. Imported breeding stock and other small hatcheries may not be able to afford sophisticated infrared machines. Provided that only a small portion of the beak is removed, by trained and competent personnel, welfare outcomes may still be preferable compared to not beak trimming at all.

**Turkey breeders – routine second beak trimming by hot blade method**

Beak trimming is justified for turkeys to control cannibalism and prevent eye damage from pecking, snood damage and potential removal and damage to hatching eggs. The behavioural factors and triggers that precipitate outbreaks of injurious pecking are not well understood in turkeys (Dalton et al, 2013) limiting the ability to institute effective control measures. Outbreaks of pecking and cannibalism in turkey flocks can be very severe with a lot of pecking damage done within a very short period of time. Early intervention can be difficult in some cases resulting in poor welfare outcomes.

Turkey beaks also grow back quite quickly following day-old beak treatment. For this reason, particularly in the case of breeder turkeys, a subsequent trim in the rearing phase is required to prevent later onset pecking and cannibalism. Beak treatment in the first week and subsequent trimming using a hot blade is practiced worldwide and considered essential by the turkey genetics companies (Aviagen and Hybrid) and is supported by the scientific literature.

Beak trimming in turkeys has also been related to improved feather score (Allinson et al, 2013 and Grigor et al, 1995). Allinson et al. recommended that trimming 'be done twice' during the sixth and fourteenth weeks (Allinson et al, 2013). Increased feed intake, improved feed conversion ratio and less feed wastage has also been correlated with beak trimming in turkeys (Noble and Nestor, 1997 and Allinson et al, 2013). There is also evidence to suggest neuroma formation following beak trimming may not be important in turkeys (Gentle et al, 1995) as may be the case in laying chickens.

Would the combination of costs and benefits under **Option G** be preferable to other options, either as a stand-alone option or in combination with other options?

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No     Yes    Comments:

**Yes** - Castration, pinioning and devoicing are not practiced and banning these could be combined with Option C to improve welfare outcomes for poultry.

**No** - The ability to perform a routine second beak trim by hot blade method must be retained on welfare grounds.

**RIS location - 4.3 preferred option**

**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?

Comments:

Option C, with the suggested amendments outlined in comments section, in combination with banning of castration, pinioning and devoicing from Option G would provide the greatest net benefits for poultry welfare.

The Australian community should also support scientifically endorsed minimum standards for poultry in consultation with industry.

**17.** 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?

Comments:

Not specifically, though we welcome the opportunity to elaborate or further explain if there are any further questions during the review phase.

**18.** Do you think that any of the Options A to G are likely to have disproportionate impact on small businesses compared to medium and large business?

No     Yes    Comments:

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Do you think that any of these options are likely to have a greater impact on small business than other options? Please provide reasons for your answers together with available supporting evidence.

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## OTHER COMMENTS OR SUGGESTIONS

Please include any comments or suggestions that you'd like to share.

### Comments on the proposed new standards and guidelines:

Standard or Guideline Reference	Standard/Guideline	Comment
SA2.2/SA2.7		These two standards are contradictory for broiler breeders where skip-a-day feeding is permitted
SA4.3	<p>A person in charge must ensure openings provided for poultry to access an outside area are designed and positioned to;</p> <ol style="list-style-type: none"> <li>1) Allow the birds to maintain a normal posture</li> <li>2) Not obstruct movement of birds; and</li> <li>3) Minimise the risk of smothering or injury.</li> </ol>	<p>These requirements are not considered practical under commercial free range circumstances, particularly for adult turkeys, where range doors would need to be very high to enable them to access the range with a normal posture. There is no guidance on range door heights provided in the guidelines for this species.</p> <p>Movement of birds could be also considered to be obstructed in the case of any commercially housed free range poultry so this is not a realistic inclusion as a standard and is not supported.</p> <p>Pophole dimensions are currently based on those outlined in the existing Model Code – <b>35cm high for chickens. Also, 2m/1000 birds</b> is the standard access requirement. <b>The standards would be better to reflect these existing standards</b> and there would no confusion as to what amount of access is required or the dimensions of popholes to enable birds to 'maintain a normal posture'. If these areas are not clarified, there is risk that standards are open to interpretation and may adversely impact on the industry.</p>
SA4.5	A person must ensure that poultry are protected from excreta from birds perching above.	Current perching provided for broilers does not satisfy this requirement and we would advocate <b>deleting this standard</b> . It would be difficult to limit the possibility of excreta from perching birds contacting other birds unless barriers were constructed for underneath perches. This would restrict floor space and create an obstacle, and in turn, adversely affecting broiler welfare.
GA4.18	Access to the outdoors should	This standard applies to laying chickens but

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	<p>meet the following requirements ...</p> <ul style="list-style-type: none"> <li>• Position of openings should allow the outdoors to be visible to birds at ground level within the laying facility</li> </ul>	is included in the general standards section.
<b>SA5.4</b>	A person in charge must take reasonable actions to minimise access to feed and drinking water by wild birds.	Recommended adding <b>'formulated'</b> prior to feed, as palatable vegetation on the range could also be considered feed.
<b>SA6.2</b>	A person in charge must ensure that the light intensity for young poultry for the first 3 days after hatching is at least 20 lux.	<p><b>Recommend replacing the word 'least' with 'average of 20 lux'</b>, as it is difficult to ensure that all floor areas (including corners of sheds) meet 20 lux as a minimum. This is consistent with the existing Model Code, which requires light intensity for brooding to be 'about 20 lux'.</p> <p>Also, costly lighting system upgrades will be required to meet this standard. We would require a <b>5 year phase in period</b> to enable all lighting systems to be upgraded in order to achieve this requirement.</p>
<b>SA6.3</b>	A person in charge must ensure that the light intensity for poultry is at least 5 lux on average during light periods.	Broiler breeders can be predisposed to pecking at low light intensities during rearing. To curb this behaviour, short periods of lower than 5 lux light intensity may be required. The standard must reflect that, <b>under veterinary supervision, for a short period light intensity may be reduced below 5 lux only as a method to control pecking in meat chicken breeders and turkeys.</b> This is an important behavioural modification tool that can control severe outbreaks of pecking and cannibalism leading to high mortality and severe stress to poultry.
<b>SA6.5</b>	A person in charge must ensure poultry except for meat chickens, emus, ostriches and quail are exposed to at least 4 hours darkness within a 24 hour period.	This may be confusing for meat chickens if not read in conjunction with SA6.4 and SB2.1.
<b>SA8.2</b>	Where litter is used, a person in charge must ensure the risk of contamination of litter with toxic agents is minimal.	This is very difficult to achieve practically. Even if each delivery of litter was tested for residues, the small quantity tested would not guarantee that toxic agents were not present. This would also be a very expensive addition to current procedures. <b>Recommend this standard be made a</b>

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		<b>guideline. Alternatively, change the wording to reflect that 'reasonable measures' be taken to ensure that the risk to poultry is minimal.</b>
<b>SA8.3</b>	Where litter is used, a person in charge must manage litter to avoid excessive caking, dustiness or wetness that impacts on the welfare of poultry.	<p>Whilst all efforts are directed towards preventing litter quality issues that will impact on the welfare of poultry, the practicalities of achieving dry and friable litter under all circumstances should be considered.</p> <p>Rotary hoeing litter with machinery can cause back scratching, stress and increased ammonia levels, resulting in a detrimental impact on welfare. Therefore, a balance must be achieved.</p> <p><b>We support changing the wording of this standard to replace the word 'avoid' with 'minimise'.</b></p>
<b>SA9.11</b>	A person must only perform toe trimming on day old hatchlings selected as potential breeders, except for emus and ostriches which may have toes trimmed on commercial stock up to 5 days of age.	<p>The ability to toe trim turkeys must be retained on welfare grounds. Recommend re-wording of this standard to allow this.</p> <p>A person must only perform toe trimming on day old hatchlings selected as potential breeders, except:</p> <ol style="list-style-type: none"> <li>1. For emus and ostriches which may have toes trimmed on commercial stock up to 5 days of age.</li> <li>2. For turkey broilers where a person must assess the need for toenail trimming and undertake only when necessary for welfare, with the following conditions: <ul style="list-style-type: none"> <li>• A person must use infrared technique and appropriately calibrated equipment.</li> <li>• A person must not aim to remove more than the toenail up to and including the nail bed.</li> <li>• A person must be trained and competent to perform this task.</li> </ul> </li> </ol>
<b>SA9.13</b>	A person must not pluck live poultry.	<p>A small number of feathers may be removed from the wings of necks of live poultry to enable collection of blood samples for diagnostic testing.</p> <p>Removal of a small number of feathers may also be warranted to assess skin conditions</p>

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		or bruising in live birds. Fertility assessment may also require a small number of feathers to be removed from the vent area.
<b>SA9.16</b>	A person must not use blinkers or contact lenses on poultry unless under veterinary advice.	<b>We support the inclusion of this standard</b> , as blinkers are considered to be a viable alternative to hot blade beak trimming and may result in improved welfare outcomes.
<b>SA9.19</b>	A person must treat hatchery waste, including unhatched embryos, quickly and effectively to ensure the rapid killing of all unhatched embryos.	Infertile eggs and dead embryos may be removed when eggs are transferred from incubators into hatchers by an automated candling machine. This hatchery waste is not subject to maceration. New candling machines may also be able to use sophisticated technology to detect dead embryos, which do not have a detectable heartbeat. <b>Not 'treating' infertile eggs or dead embryos, as part of 'hatchery waste' is not considered to have an impact on welfare and should be an exemption to this standard.</b>
<b>SA11.6</b>	A person must ensure that if there is an extended delay in slaughtering, alternative arrangements are made for slaughter at an alternative facility, or humane killing.	There is often only one processing facility in each area where poultry are processed. Alternative facilities may not be available and humane killing of large numbers of poultry is not considered feasible. In these circumstances, <b>poultry are returned to farm</b> . This must be included as an option.
<b>SA11.7</b>	A person must ensure that all poultry held awaiting slaughtering must be protected from direct sunlight, radiant and reflected heat, and adverse weather such as rain and wind.	It is considered very important for welfare that stocked trailers are not parked in direct sunlight and that the chickens are protected from adverse weather, such as heavy rain and wind, which could result in heat or cold stress. Light rain or mild wind is unlikely to result in poor welfare. In fact, when birds are housed at higher density in crates or drawers, wind and rain is unlikely to have an impact on welfare.  Unless lairage areas are completely enclosed, it may be difficult to guarantee that they are not exposed to any rain, wind or reflected heat. Perhaps, the wording of this standard could be changed <b>to ensure protection of poultry from direct sunlight and any adverse weather conditions, which may result in heat or cold stress.</b>

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		<p>If lairage areas need to be fully enclosed to protect against minor rain or reflected sunlight, this will come at significant cost and may not necessarily result in any improvements for poultry welfare. There may also be some situations, where unloading of birds may need to occur in areas that are not fully protected from all of these conditions.</p> <p><b>A phase in period of at least 5 years would be required if lairage areas are required to be fully enclosed.</b></p>																		
<b>SB2.1</b>	<p>A person in charge must ensure that after 7 days of age, lighting patterns must encourage activity and provide a minimum period of 4 hours of continuous darkness each day except on the day of pickup (meat chickens) and meat chickens during very hot weather.</p>	<p><b>We oppose the inclusion of the words 'encourage activity' in this standard.</b></p> <p>Encouraging activity is counter-welfare with respect to broiler chickens. Increased light intensities can promote activity but also increase the flightiness of birds, resulting in back scratching and smothering.</p>																		
<b>SB13.3</b>	<p>A person must not lift or carry turkeys by the head, neck, wings, feathers or tail feathers unless otherwise supported by the breast. Except when lifted by the tail feathers and neck or by a leg and a wing or by the base of both wings for vaccination.</p>	<p>This standard needs to be revised to make it clearer with respect to handling requirements.</p> <p>A person must not lift or carry turkeys by the head, neck, wings, feathers or tail feathers unless otherwise supported by the breast. Except when lifted:</p> <ul style="list-style-type: none"> <li>• by the tail feathers and neck; or</li> <li>• by a leg and a wing (incl. for artificial insemination and catching); or</li> <li>• by the base of both wings for vaccination.</li> </ul>																		
<b>SB13.5</b>	<p>A person must ensure the maximum recommended stocking densities for turkeys are according to the housing type and under good management conditions are as follows:</p> <table border="0"> <tr> <td>Live weight</td> <td>Bird density</td> </tr> <tr> <td>6kg</td> <td>30kg/m<sup>2</sup></td> </tr> <tr> <td>7-10kg</td> <td>35kg/m<sup>2</sup></td> </tr> <tr> <td>10-13kg</td> <td>42kg/m<sup>2</sup></td> </tr> <tr> <td>13+kg</td> <td>46kg/m<sup>2</sup></td> </tr> </table>	Live weight	Bird density	6kg	30kg/m <sup>2</sup>	7-10kg	35kg/m <sup>2</sup>	10-13kg	42kg/m <sup>2</sup>	13+kg	46kg/m <sup>2</sup>	<p>Recommend altering this standard:</p> <table border="0"> <tr> <td><b>Live weight</b></td> <td><b>Bird density in useable area</b></td> </tr> <tr> <td><b>&lt;13 kg</b></td> <td><b>42 kg/m<sup>2</sup></b></td> </tr> <tr> <td><b>13 - 17kg</b></td> <td><b>46kg/m<sup>2</sup></b></td> </tr> <tr> <td><b>&gt;17kg</b></td> <td><b>50kg/m<sup>2</sup></b></td> </tr> </table> <p>Turkey densities must be viewed differently to chicken densities, as these are different animals with a taller and heavier structure. The note also says that intensive sheds should be equipped with fans and foggers to be able to maintain the proposed densities. This is the equivalent to mechanical ventilation in the case of the</p>	<b>Live weight</b>	<b>Bird density in useable area</b>	<b>&lt;13 kg</b>	<b>42 kg/m<sup>2</sup></b>	<b>13 - 17kg</b>	<b>46kg/m<sup>2</sup></b>	<b>&gt;17kg</b>	<b>50kg/m<sup>2</sup></b>
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		<p>chicken densities. Sheds with tunnel ventilation are becoming increasingly common in the turkey industry and density standards should be increased in these cases to reflect improvements in housing.</p> <p>Farm Animal Welfare Council (FAWC, 1995) has concluded that the growth characteristics of turkeys on a three dimensional basis requires special consideration when determining stocking density. They have recommended stocking densities should be scaled according to a two-thirds power of their live weight. On this basis, it was recommended that turkey broilers at terminal density can be stocked up to 59 kg/m<sup>2</sup> when grown up to 20 weeks of age (Webster, 2011). We do not propose increasing density to this level but suggest that at densities higher than those currently proposed can still be maintained without compromising welfare.</p> <p>In Canada, the maximum density permitted for turkeys over 13.3kg is up to 55kg/m<sup>2</sup> with conditions allowing up to 65kg/m<sup>2</sup> (<a href="http://www.nfacc.ca/poultry-code-of-practice">http://www.nfacc.ca/poultry-code-of-practice</a>). The maximum stocking densities permitted for commercial turkeys housed in Germany are reported to be between 52-58kg/m<sup>2</sup> for hens and toms respectively (Bergmann <i>et al.</i> 2013). Therefore, the current proposed stocking densities are also considerably lower than those permitted internationally.</p> <p>It is reported in this study by Bergmann <i>et al.</i> 2013 that there was no relationship found in the previous study conducted from 2007-2009 between maximum stocking density and footpad dermatitis. This aim of the 2013 study was to determine the impact of the initial placement density on footpad dermatitis rather than maximum stocking density. Litter management and other management factors are also considered to be the main driver of welfare outcomes in turkeys rather than stocking density alone, noting</p>
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		that Australian climate differences in response to Question 13 of the RIS questions.
<b>GB13.2</b>	The provision of whole grain or coarse cereal fragments as part of grower and finisher feeds should be provided to aid with development of the digestive tract.	Recommend removal of this guideline, as does not relate to animal welfare.
<b>GB13.6</b>	During brooding at day old, a temperature of 37 measured 8cm above the floor just under the rim of the brooder should be provided with general shed temperature of at least 21 in the bird area.	Recommend removal of this guideline. This conflicts with temperature guidelines in GB13.7. The large temperature differential between areas is not considered best practice for brooding turkeys. GB13.7 is the correct guidance for brooding temperatures (although can remove 'space-heated brooding systems' as it applies to all systems).
<b>GB13.8</b>	When performing management procedures the turkeys should be handled in the following ways...	This guideline duplicates SB13.3 – recommend removing GB13.8. Furthermore, holding turkeys by the base of a wing and a leg may be required to position them for artificial insemination.
<b>GB13.20</b>	If catching into crates, the approved methods for catching individual birds are...	Catching is covered by Land Transport Standards. This duplicates the other standard and guideline. Recommend removal of this guideline. Turkeys are generally caught by the base of one wing and a single leg. It is impractical to catch by holding one wing and both legs.
<b>GB13.21</b>	If catching into modules, turkeys should be caught by grasping the shoulder of the wing furthest from the catcher, and using the other hand to hold both legs before lifting the bird up and into the drawer.	See comments relating to GB13.20. Recommend removal of this guideline.
<b>Glossary</b>	The definition of 'skip-a-day' feeding is incorrect for broiler breeders.	Another definition for skip-a-day feeding is required. Skip-a-day feeding in the case of meat chicken breeders refers to when the same weekly feed allocation is provided but on alternate days rather than feeding every day. This practice ensures better feed distribution and uniformity of feed intake in comparison to feeding of small quantities of feed daily.

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