



# FREE RANGE EGG & POULTRY AUSTRALIA LTD

ABN: 83 102 735 651

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Animal Welfare Standards Public Consultation  
PO Box 5116  
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BY EMAIL: [publicconspoultry@animalhealthaustralia.com.au](mailto:publicconspoultry@animalhealthaustralia.com.au)

**Re: Submission to the Draft Australian Animal Welfare Standards and Guidelines for Poultry (S&Gs) and the associated Regulation Impact Statement (RIS).**

Free Range Egg and Poultry Australia Ltd (FREPA) is a not for profit, membership-based organisation that was established in 2001. FREPA is the industry-leading free range accreditation body and is committed to ensuring credible and quality accreditation of free range egg and poultry products across Australia. Accreditation is provided to free range egg producers, chicken meat growers, turkey meat growers and processors that meet the FREPA Standards. FREPA sets high standards of animal welfare, traceability and production and ensures these are met through regular auditing by independent Exemplar Global qualified auditors. FREPA's Standards are available at [www.frepa.com.au/standards](http://www.frepa.com.au/standards).

FREPA is the holder of one certification trade mark, which has been approved by the ACCC and IP Australia. The primary mark is a logo with the words "Accredited Free Range" and a picture of a chicken within an outline map of Australia.

FREPA welcomes the opportunity to comment on the draft Australian Animal Welfare Standards and Guidelines for Poultry. As an organisation responsible for free range poultry accreditation only, comments provided are specific to the RIS questions and S&Gs that relate specifically to free range egg, meat chicken and turkey farms, or "outdoor systems", as free range is classified in the S&Gs.

The *Model Code of Practice for the Welfare of Animals – Domestic Poultry 4<sup>th</sup> edition (2002) (MCOP)*, in addition to other relevant legislation, codes and guidance documents, provides the framework for the current FREPA Standards. Consumers expect free range farms to be inherently higher welfare. Auditing of the welfare and free range requirements outlined in the *MCOP* and the FREPA Standards is considered to provide consumers with a high level of confidence in the products accredited by FREPA.

The *MCOP*, although it has not been updated since 2002, is still considered an important and relevant document with respect to poultry welfare and free range requirements. However, it is accepted that welfare science, farming practices and community expectations change over time. The review of the existing *MCOP* is welcomed by FREPA in order to ensure standards remain current and reflects these changes.

The format of the *MCOP* has created some confusion, as 'must' and 'should' statements are intertwined throughout the document. Clearer direction in order to inform nationally consistent standards is welcomed. The guidelines, underpinned by science, may also help to ensure FREPA's Standards moving forward reflect best industry practice and higher welfare.

FREPA operates nationally and accredits egg, chicken meat and turkey farms in most states. For this reason, it is considered imperative that welfare regulations are consistent across all states and territories for all species. Free range requirements should not differ depending on the state or territory where the poultry farming businesses are located. **Option C, with amendments, is considered to provide the greatest net benefits for poultry welfare and will ensure that standards are nationally consistent with respect to free range. Option B may also provide similar benefits for farms and producers that operate in accordance with FREPA's accreditation requirements.** Under Option B, FREPA-accredited farmers and processors would similarly be required to comply with the new standards.

The proposed new standards, as they relate to free range requirements, are considered to be more outcomes-based when compared to the current *MCOP*, which is considered more prescriptive. For example, in the current *MCOP*, farms must have pophole or range door access equating to a minimum of 2 metres per 1000 birds and range access is required for a minimum of 8 hours per day taking into account welfare, including climatic conditions and bird health considerations. Pophole access requirements have not been prescriptively included as part of the new standards and guidelines. It is appreciated that species differences add complexities and make it more difficult to determine standards that will apply to all poultry species. However, in FREPA's view, every effort must be made to ensure standards are not subjective and producers have a clear understanding of the requirements, or minimum standards, particularly for free range. Objective standards provide consumers and producers with confidence that range access requirements are adequate. Furthermore, it is considered important that welfare outcomes for poultry are easily measurable. Producers and welfare may be adversely affected by standards that are outcomes-based or subjective, if this leads to problems with interpretation.

## **RIS Public Consultation Questions**

### **Excess regulatory burden**

Inconsistencies between states and territories with respect to welfare legislation can create problems for FREPA, as the leading national free range accreditation body. The poultry industry can also be disadvantaged by standards that are not nationally consistent. For example, FREPA's requirements are that laying hens be stocked in accordance with the current *MCOP* at 1,500 hens per hectare. Whilst the 1,500 hens per hectare standard was previously applied for free range systems in some states, principally Queensland, the outdoor stocking density in other states was routinely 10,000 hens per hectare or above. The ACCC has subsequently released mandatory information standards and labelling requirements for free range egg producers, which will commence on 26 April 2018. This Free Range Egg standard refers in part to a stocking density of 10,000 hens or less per hectare. This will in all likelihood have the effect of replacing the outdoor density requirements outlined in the *MCOP*, for egg producers, as outdoor density standards in the *MCOP* were not consistently adhered to previously by free range egg producers. Moving forward, it is important that national standards applying to free range and welfare are objective and consistent. This allows governing bodies, accreditation bodies and industry quality assurance programs to audit in accordance with national standards, leading to greater consumer confidence and certainty with respect to free range requirements.

To avoid confusion and problems with inconsistency, FREPA is not opposed to maximum allowable outdoor stocking densities being included for free range housing systems in the new S&Gs. A prescriptive outdoor density is included in the *MCOP* for laying hens only, at 1,500 hens per hectare. For free range meat chickens, the guidance is not clear on outdoor density but allows higher densities than those of laying hens to be maintained. This is due to the accepted relatively shorter period of the cycle that meat chickens are permitted to access the range. However, cycle length for commercial meat chickens is shorter than that outlined in the *MCOP*. Although it is also accepted that outdoor stocking densities could be included as part of free range accreditation scheme or labelling requirements. If outdoor densities are included in the

new S&Gs, standards must be species specific and be consistent with current, successful industry practice. Changes to outdoor densities have not been costed as part of the RIS. The rationale for including outdoor densities as part of the standards is to provide consumers with confidence that products sold as free range meet the minimum requirements for free range housing. Accreditation bodies or industry quality assurance programs could then build their framework around the existing minimum standards, or determine their own independent requirements, ensuring that at least the minimum standards are met. In the case of free range laying hens, the outdoor stocking density must be a maximum of 10,000 hens per hectare in order to be consistent with the recently released ACCC labelling Standard. In the case of free range meat chickens, RSPCA and FREPA requirements are that the outdoor area provided for ranging is at least the equivalent to the size of the shed footprint. For new farms that are not limited by the available land for the outdoor area or overall farm footprint, the range area is a minimum of 1.5 times the shed footprint. The ranging behaviour of meat chickens is different to that of laying hens (Taylor *et al.*, 2017) and outdoor areas vary in size accordingly.

### **Stocking densities - indoor**

FREPA Standards require that the indoor stocking density for free range meat chickens be maintained at 28kgs of live birds per square metre of floor space, unless there is mechanical ventilation, where stocking density is maintained at 30kgs of live birds per square metre of floor space. For laying hens, FREPA Standards require the indoor stocking is maintained at 6 birds per square metre if over 4,000 hens are housed.

The FREPA indoor densities are explained by consumer expectations that density be lower for free range, although it is accepted that lower densities do not necessarily equate to higher welfare. FREPA challenges the rationale for the proposed reduction in indoor densities for poultry housed exclusively indoors, as outlined in the RIS. Free range housing systems may require different indoor stocking densities when compared to poultry that is housed exclusively indoors without access to an outdoor area.

Also, when poultry is housed indoors only, ventilation systems are generally able to operate more effectively in order to maintain bird comfort and indoor conditions. This is a generalisation and based on principle only. There are other factors that have also contributed to FREPA's Standards requiring indoor densities of 28-30kg per square metre for free range meat chickens to be maintained. It is unclear why 30kg per square metre for meat chickens and 9 hens per square metre for laying hens are proposed in the RIS, as an appropriate new minimum standard for poultry housed in indoor systems with suitable environmental control. The lower densities outlined in the RIS may be more suitable for free range housing systems, which are an entirely different set of circumstances.

### **Hot blade beak trimming at hatcheries and routine second beak trimming by hot-blade**

FREPA acknowledges that banning the routine second beak trim by hot-blade method for laying hens may deliver net welfare benefits but only supports this approach where there is not considered to be any negative outcomes from a welfare perspective.

It is recommended that the assessment as to whether the second beak trim is required is carried out by a knowledgeable person with the required experience. Hot blade beak trimming at hatcheries is considered similar to the rationale for allowing the second beak trim with sound welfare justification only. However, where infrared treatment technologies are available and considered feasible, this is the preferred approach.

## Comments on Specific Draft S&Gs

### Part A: General standards and guidelines for all species of poultry

#### Section 4 – Facilities and equipment

**SA4.3** A person in charge must ensure openings provided for poultry to access an outside area are designed and positioned to;

1. Allow the birds to maintain a normal posture; and
2. Not obstruct the movement of birds; and
3. Minimise the risk of smothering or injury.

FREPA has a number of concerns in relation to Standard **SA4.3** under Section 4 and is unable to support the inclusion of this standard as drafted. Applying this as an ‘outcomes based’ standard across all species of poultry is problematic and will create uncertainty for producers and for industry. In the case of laying hens, meat chickens and turkeys, this standard will be difficult to apply practically. It is also very difficult for growers, companies and auditors to assess and determine compliance with respect to this standard, as it is considered subjective and open to interpretation. If non-compliances against this standard could also result in prosecution, this is a cause for considerable concern.

The *MCOP* already states that ‘openings should be of a size and number and be evenly distributed to allow easy entry and exit for the birds with no impediments. As a guide openings should be a minimum 35 cm high and 40 cm wide with 2 metres per 1000 birds’.

FREPA advocates that aspects of the existing guidance statement replace Item 1 of the proposed new standard to ensure consistency and compliance. We support ‘2 metres per 1000 birds’ being included as a standard and the appropriate door height for each species of poultry be included as the corresponding guideline. An investigation by FREPA supports door heights being a minimum of 35cm high for meat chickens and a minimum of 80cm high for turkeys to enable them to exit the popholes and maintain a relatively normal posture. However, the height of turkeys can vary considerably depending on their age and sex. This provides the rationale for including door heights as a guideline only, rather than as a standard.

FREPA currently accredits commercial free range farms and does not support the inclusion of Item 2 under **SA4.3**. In commercial situations, even with pophole access in accordance with the requirements outlined in the existing *MCOP*, it is impossible to guarantee that movement of birds through popholes is not obstructed by any means at any given time. The interpretation of this aspect is unclear as drafted. It is assumed that birds could also obstruct movement of other birds through pophole openings creating problems for compliance with this standard.

Provision of the current 2 metres per 1000 birds access to the range area should adequately prevent the risk of smothering. Additional requirements may need to be incorporated to minimise the risk of injury to birds when entering and exiting from popholes.

**GA4.18** Access to the outdoors should meet the following requirements:

- openings should be of a height to allow birds to pass through using normal posture
- design and position of openings should avoid birds being able to obstruct the movement of other birds
- **position of openings should allow the outdoors to be visible to birds at ground level within the laying facility**
- the area around openings should be kept clean and well drained.

- FREPA recommends removing the third aspect of guideline **GA4.18** because it effectively prevents the use of ramps, which are commonly used to access the range area. These are not positioned at ground level. This guideline also contradicts **GA4.19** (below) and would not be able to be practically implemented if ramps are employed to enable chickens to access the range.

**GA4.19** If ramps are provided, they should be made from non-slip material, allow for minimal effort and ease of bird movement and be cleaned after each batch.

## Section 5 – Management of outdoor systems

**SA5.1** A person in charge must ensure that young poultry are adequately feathered before access to an outdoor area.

**SA5.2** A person in charge must ensure poultry kept in housing with access to an outdoor area have ready access to the shed and shaded areas.

**SA5.3** A person in charge must not keep poultry on land which has become contaminated with poisonous plants or chemicals which cause disease to an extent which could seriously prejudice the **health** of poultry.

**SA5.4** A person in charge must take reasonable actions to minimise access to **feed** and drinking water by wild birds.

**SA5.5** A person in charge must ensure that poultry are able to be confined as required in compliance with housing standards to manage welfare risks to birds in the outdoor area.

- In relation to **SA5.3** FREPA recommends replacing the word ‘health’ with ‘welfare’ as injuries are not necessarily a health consideration.
- The word ‘feed’ in **SA5.4** should be changed to ‘formulated feed’ as vegetation on the range could be considered ‘feed’.
- Whilst FREPA does not have any accredited egg or meat producers that would be adversely affected by the need to comply with **SA5.5**, this will create issues for open caravan-type free range enterprises that are unable to confine poultry indoors at the maximum stipulated indoor stocking densities. It is unclear whether the need for these mobile operations to build compliant indoor housing has been costed as part of the RIS. FREPA acknowledges that the welfare of birds housed in these type of operations needs to be adequately considered. Exposure to extreme temperatures, as well as biosecurity considerations if feed and water is able to be accessed by wild birds and waterfowl, are important factors to consider when determining whether open caravan-type free range systems are able to continue with their current model of operation.

**GA5.1** The outdoor area should be actively managed and maintained to:

- encourage birds to access all areas
- provide birds with palatable vegetation
- control disease and parasites
- avoid injury or mortality
- prevent land degradation
- avoid accumulation of water
- minimise contact with **wild birds**
- minimise the risk of fire.

- The seventh point included in guideline **GA5.1** relates to minimising contact with wild birds. This point needs to be adequately expanded to include predators, as stated in section 2.4.5.5 of the existing *MCOP*.

**GA5.2** A management plan for the outdoor area should be developed and followed that covers the management of:

- risk of disease and parasites
- **drainage**
- shelter and shade

- It is recommended that the following clarification be added to the reference in guideline **GA5.2** to drainage – ‘to minimise the development muddy or unsuitable conditions’, in accordance with the previous *MCOP*. Drainage is an important consideration but the risk to welfare results from when the range areas become muddy or unsuitable for ranging.

**GA 5.4 Poultry should be confined at night to mitigate predation and biosecurity risks.**

- It is assumed that the reference to 'biosecurity risks' in this guideline relates to increased likelihood of waterfowl visiting the range area at night. However, given that many pathogens that could be transmitted by wild birds and waterfowl are likely still to be viable on the range the following day, after accessing the range overnight, the justification for including biosecurity risks as part of this guideline is questionable. It is recommended that 'biosecurity risks' be omitted from this guideline.

**Part B: Species standards and guidelines for poultry**

**Section B1 Laying Chickens – Guidelines for Outdoor area**

**GB1.21** Birds should **at least have daily access** to the outdoor area immediately after the egg-laying period. The exceptions to this are during unsuitable weather conditions, while training birds to use the nests, under direct veterinary advice, during treatment specified in the Veterinary Health Plan, or on the day of depopulation.

- There are no minimum requirements specified for 'daily access' and this is only a guideline under the laying chickens section. The previous *MCOP* required 'ready access through openings during daylight hours for a minimum of 8 hours per day. The only exception is under adverse weather conditions or serious outbreaks of disease when birds may be kept inside.' FREPA recommends this wording replace **GB1.21**, as it provides objective guidance with respect to ranging times and reflects community expectations with respect to free range requirements. This guideline should be included for all species and not just for laying hens, as it is an important consideration for all free range operations.

**GB1.22** A daily record specifying the date and times of access to the outdoor area should be kept.

- There is no indication of what would constitute acceptable range access, if daily records are kept. See guideline comments above suggesting guidance be provided relating to minimum range access.
- This is only a guideline under the laying hens section. It is recommended that this guideline be included for all poultry species that may be housed in free range systems. Records are an important consideration and this ensures range access is auditable and meets community expectations.

**GB1.23** At least 8m<sup>2</sup> of natural or artificial shade/shelter per 1000 birds should be provided and distributed across the outdoor area.

- This guideline is derived from the RSPCA Standards and was not included in the existing *MCOP*. It is based on requirements for shade for laying chickens. FREPA supports the inclusion of this guideline for meat chickens in addition to laying hens, as the provision of adequate shade is considered important to encourage birds to access the range.

**GB1.25** Feed and drinking water should not be provided in the outdoor area.

- This is only included as a guideline for laying chickens in the draft S&Gs. FREPA strongly recommends that this guideline be included in the sections relating to the other species, where appropriate, as it is considered to be an important biosecurity consideration for all free range systems.

**References**

Taylor, P, S., Hemsworth, P.H., Groves, P.J., Gebhardt-Henrich, S.G. & Rault, J-L. 2017. 'Ranging behaviour of commercial free-range broiler chickens 1: Factors related to flock variability'. *Animals*, 7(7): 55.