

# Australian Animal Welfare Standards and Guidelines – Poultry

## Independent Public Consultation Report

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For Animal Health Australia

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# Executive Summary

This document was prepared by the Independent Public Consultation Consultant whose role was to examine and summarise the major written submissions to the public consultation processes for the Australian Animal Welfare Standards and Guidelines for poultry, as forwarded by Animal Health Australia, into a Public Consultation Summary report/Action plan. This report will function as a comprehensive summary and analysis of the range of submissions for use by the poultry Drafting and Stakeholder Groups and will be published at [www.animalwelfarestandards.net.au](http://www.animalwelfarestandards.net.au).

An open public consultation of the proposed draft Poultry Welfare Standards and associated Regulation Impact Statement was undertaken for a 90 day period from 27 November 2017 to 26 February 2018.

The public consultation received an estimated 167,000 email submissions and an estimated 2,000 hardcopy submissions. All submissions were read and were classified into short submissions (the overwhelming majority), 'new insight' or extended response submissions (45), and major submissions (209) considered to be from major organisations/stakeholder groups. The major submissions were from industry bodies (11) and producers (54), welfare (17) and legal (10) groups, exhibition poultry fanciers (29), government departments (3), members of parliament (9), veterinarians or veterinary organisations (5), consultants and researchers (6), and interested community members (52). Many of these major submissions specifically addressed the Regulation Impact Statement (RIS) and the Proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry (S&G). Submitters were not responded to directly.

It was clear from the overwhelming number and content of submissions that the welfare of poultry in Australia generates considerable public interest. It was also clear from the submissions that there are significant differences of opinion about how to ensure good welfare within poultry production systems and in particular the issues addressed within the RIS and the S&G, such as:

- The use of cages, specifically conventional cages for layer hens and meat and layer chicken breeders. The overwhelming majority of submissions mentioned this particular issue, while some drew a distinction between conventional and furnished cages.
- Beak trimming and other painful procedures
- The use of limited feeding strategies such as induced moulting and alternate-day feeding
- Stocking densities
- Lighting for housed poultry
- Humane killing and slaughtering procedures, including procedures for dealing with male layer chicks.

Industry bodies and producers tended to be supporting of the continued use of cages for layer hens, citing decreased mortality and better health than non-caged systems. Some advocated the use of furnished cages in place of conventional cages.

Welfare and legal groups, and the majority of the community members, opposed the use of conventional cages, citing poorer wellbeing due to denial of natural behaviours, and there was limited support for enriched/furnished cages.

Several submissions provided extensive technical (scholarly) information to support their position, which is referred to the drafting group for their assessment.

Industry and producer groups tended not to support a ban or phase out of conventional cages, arguing that increased costs to industry, and increased costs to the consumer would not deliver significant benefits in hen welfare. Many supported Option C in the RIS, with some changes suggested to specific S&G. Some groups advocated for the use of furnished cages, and expressed disappointment that they were not expressly considered with the RIS and S&G.

Welfare and legal groups, and the majority of the community members, tended to support a ban or phase out of conventional cages, arguing that this was supported by the majority of community members, consumers, retailers and food companies, and had occurred in certain jurisdictions i.e. ACT. Many submissions called for an immediate ban, however others acknowledged that a phase out was required. Many supported Option D within the RIS but with the caveat that the phase out was within 10 years rather than 20 years.

There was criticism of the process of the development of the RIS and S&G from welfare and legal groups, as well as the general public, with claims of a lack of basis in current science due to the absence of an independent review, and accusations of governments' collusion with industry.

The key tension within the submissions is how to evaluate and provide a 'life worth living' for Australia poultry in current production systems, and particularly whether 'protection' from harmful factors through the use of (conventional) cages is 'better for hens' than the ability to express natural behaviours in non-cage systems where there are other risks to animal health and welfare. It should be noted that many submissions debate whether these attributes are characteristic of each production system, and provide evidence to support their case. Several note that there are welfare issues in all systems, the factors that contribute to welfare are complex and interact, and management is a key factor in providing good welfare.

The other key tension within the submissions is balancing the welfare needs of poultry with the needs of the community, and particularly balancing community support for changing production practices with the projected costs of industry change.

The Consultant recommends that the Drafting Group, under the direction of Animal Welfare Task Group, review the technical information provided in the submissions in order to evaluate them in light of the decision-making principles and the objectives of the review.

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# List of Abbreviations

## Organisation Acronyms

ACGC	Australian Chicken Grower Association
ACMF	Australian Chicken Meat Federation
ADMA	Australian Duck Meat Association
ADO	Animal Defenders Office
AFSA	Australia Food Sovereignty Alliance
AHA	Animal Health Australia
ANRPB	Australian National Racing Pigeon Board
APVMA	Australian Pesticides and Veterinary Medicines Authority
ATF	Australian Turkey Federation
AVA	Australian Veterinary Association
AVPA	Australian Veterinary Poultry Association
AWTG	Animal Welfare Task Group
AWLQ	Animal Welfare League Queensland
CEFASAT	Commercial Egg Farmers of South Australia and Tasmania
CEPAWA	Commercial Egg Producers Association of Western Australia
DG	Drafting Group
EFA	Egg Farmers of Australia
EPANSW	Exhibition Poultry Association of New South Wales
FEC	Fremantle Egg Company
HSI	Humane Society International
LIV	Law Institute of Victoria
LSSA	Law Society of South Australia
NSWFA	New South Wales Farmers' Association
OIE	World Organisation for Animal Health
PETA	People for the Ethical Treatment of Animals
PROOF	Pasture Raised On Open Fields

QUEP	Queensland United Egg Producers
RSPCA	Royal Society for the Prevention of Cruelty to Animals
SBA	Specialised Breeders Australia
SQA	Sunny Queen Australia
VFF	Victorian Farmers Federation
WAP	World Animal Protection

## Other Abbreviations

FBWSR	Farmed Bird Welfare Science Review
MCOP	Model Code of Practice
RIS	Regulation Impact Statement
S&G	Draft Australian Animal Welfare Standards and Guidelines for Poultry



# Context for the Report

## Scope of the Standards and Guidelines

The scope of the Standards and Guidelines was endorsed by Animal Welfare Task Group in 2015.

## Public Consultation Process

An open public consultation of the proposed Poultry Welfare Standards and associated Regulation Impact Statement was undertaken for a 90 day period from 27 November 2017 to 26 February 2018.

A website (<http://www.animalwelfarestandards.net.au/poultry/poultry-public-consultation/>) hosted the documentation associated with the public consultation.

### Communication process

National industry bodies and state/territory jurisdictions who are members of the Stakeholder Advisory Group (SAG) committed to consult with their representational state/territory-based stakeholders with regard to the development, implementation and enforcement of the poultry welfare standards and guidelines.

To complement jurisdiction-level communications, Animal Health Australia (AHA) circulated the poultry standards and guidelines consultation draft, the RIS and relevant communications materials to all the relevant state/territory Ministers, government departments, peak industry bodies, peak animal welfare groups, state farming organisations, state Animal Welfare Advisory Committees, media contacts and others throughout the public consultation period. This circulation list included the Australian Small Business and Family Enterprise Ombudsman, plus appropriate state and territory small business officials.

Many of these organisations disseminated the notification and promoted the public consultation process through their respective websites (linking to the consultation website), newsletters and email to their members, underwent numerous radio interviews, undertook huge social media campaigns and produced advertising in The Age and The Sydney Morning Herald. The efforts of all stakeholders who helped spread the word about public consultation, ensured the message went far and wide, for an extensive public consultation. Prior to the closure date of 26 February, some organisations sought a two week extension in which to submit substantive submissions. AWTG agreed this, with the extension closure date of Monday COB 12 March 2018.

## Role of the Independent Public Consultation Consultant

The role of the Independent Public Consultation Consultant was to examine and summarise the major written submissions to the public consultation processes for the Australian Animal Welfare Standards and Guidelines for poultry, as forwarded by AHA, into a Public Consultation Summary report/Action plan.

The report, finalised to a standard suitable for publication, needed to make observations, conclusions, and recommendations to AHA for consideration by the projects Drafting Group.

The consultant's report provides a comprehensive summary of the submissions received during public consultation. The consultant does not make recommendations about the content of the S&G, and did not evaluate the technical material provided within the submissions. Rather, the consultant reports on the range of views received during public consultation and identifies where the Drafting Group may be required to seek advice from Animal Welfare Task Group (AWTG) or further review the technical material provided with related submissions.

## Role of the Drafting Group

Based on consideration of the public consultation submissions and the Independent Public Consultation Consultant report, a revised S&G document will be developed by the Drafting Group under the direction of the AWTG. The Drafting Group is a small group with expertise in legal and/or standards and guidelines drafting and poultry technical expertise.

In the revision of the draft S&G, the Drafting Group will aim to ensure that the final standards are:

- desirable for livestock welfare;
- feasible for industry and government to implement;
- important for the livestock-welfare regulatory framework, and
- will achieve the intended outcome for livestock welfare.

The Drafting Group will examine scientific evidence accompanying submissions to inform its revisions to the draft standards and guidelines.

# Submissions

Assessment of submissions from the public consultation process gave consideration to:

- the extent to which suggestions strengthen the intent and objectives of the standards
- the volume and variety of responses making similar suggestions
- form letters were considered as providing a collective submission
- anticipated benefits or adverse impacts if submitted suggestions were to be implemented
- the viability of implementing any suggested change.

Over 167,000 submissions were received between 27 November 2016 and 26 February 2017. **All submissions were read by AHA.** Of these, 209 were considered substantive or major submissions that addressed the RIS and/or the draft S&G (see Appendix 6 - List of Major Submissions at the end of this report) and were forwarded to the Independent Public Consultation Consultant for further analysis.

Major submissions were received from:

- 11 industry associations or peak bodies
- 38 egg producers
- 14 chicken or turkey meat producers
- 2 other poultry producers
- 17 animal welfare organisations
- 10 lawyer organisations
- 3 government departments
- 9 members of (state) parliament
- 29 exhibition poultry organisations or owners
- 6 racing pigeon organisations
- 52 community members
- 7 other organisations/individuals
- 6 consultants/researchers
- 5 veterinary organisations or veterinarians

Types of submissions within the major submissions (note some submissions were of more than one type) included:

- 46 general submissions that did not specifically address the draft S&G or the RIS
- 33 identified a preferred RIS option
- 37 addressed the RIS questions
- 84 made comments on the draft Standards and Guidelines.

Note: AHA did not contribute a formal submission as they are managing the development of the standards at the request of the AWTG.

Thousands of campaign emails based on numerous campaign materials “ban the battery cage” etc were received as well as thousands of emails received from backyard poultry owners, children and general members of the public expressing their view to ban conventional cages.

The remaining public submissions comprised of shorter statements that were broadly related to the welfare standards. Of these 45 were considered ‘new insight’ or extended responses and these were also forwarded to the Independent Public Consultation Consultant for analysis.

### Analysis of short public submissions

A subsample of the short public (not major or new insight) submissions was selected for further analysis according to the following method. The initial sample of 5,000 submissions read suggested the majority were short and did not aim to comment on the scientific basis documents or the inclusion of specific standards and or guidelines. Rather majority of submissions were a short response in relation to caged eggs. Submission which stated “A” or “I” with no other information were deleted. These submissions were likely referencing a newspaper poll on the subject, however were not counted if no other content was provided except a letter of the alphabet.

Type of Submission	Collection	Random Sampling Method	Sample Size
Soft copy	All emails received by the Poultry Consultation inbox	Dates and times from the entire consultation period will be randomly generated (using the Excel random date/time generator) and the corresponding email selected.	380

The date and time of soft copy submissions were randomly generated to account for the changes in media/ audience reach during the consultation period. Hard copies were not assigned dates and therefore randomly selected after filing.

The calculations for sample size used makes certain assumptions about the type of data sampled and given the responses are not categorical it would not be a robust method if performing a qualitative content analysis. However, the confidence interval selected was high and was chosen to increase the sample size for a greater representation of opinion. Given a statistical analysis was not performed this provides a sufficient estimate for random sampling.

All short public submissions were examined and summarised by AHA. A list of themes from these submissions, plus the subsample, was forwarded to the Independent Public Consultation Consultant for incorporation into this report (see Appendix 5 for themes).

### Analysis of new insight and major submissions

All ‘new insight’ and major submissions were analysed independently by the Independent Public Consultation Consultant. Submissions were received as compressed files of emails from AHA. Each file was decompressed and attachments saved separately. Submissions within emails were copied

into a word document to facilitate analysis. All submissions were saved to a folder on a server accessible only by the Consultant and an external hard drive to ensure confidentiality. Using a spreadsheet, all submissions were given a unique code, and were categorised according to the type of submission and submitter.

Analysis used a general inductive approach<sup>1</sup> where the purposes of an inductive approach are to condense extensive and varied raw text into a brief, summary format, and to establish clear links between the objectives and the summary findings derived from the raw data and to ensure that these links are both transparent and defensible.

The general inductive approach relies on an evaluator coding the data. Coding refers to identifying words or phrases in the text that relate to the objectives of the analysis. It should be noted that this involves the evaluator making decisions about what is more or less important within the data. Codes are then amalgamated into larger categories (referred to in this document as themes).

Initially it was intended that coding would be facilitated by the use of the software program *NVivo* (QSR International), however approximately half of the submissions (including documents in pdf format and scans of hard copies) could not be read by the program. Consequently, the remaining submissions had to be coded using more time-consuming non-digital methods.

During analysis, each RIS Option, RIS Question response, and direct response to a Standard or Guideline was treated as a code to facilitate the development of the tables in Appendices 1-3. In addition, phrases or words related broadly to the RIS, S&G, or the welfare of poultry were also coded. Other codes emerged from the data, i.e. they were a feature of the submission itself. These two latter categories of codes were amalgamated into the broader themes.

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<sup>1</sup> Thomas, D. (2006) A general inductive approach for analysing qualitative data. *American Journal of Evaluation*, 27(2), 237-246.

# Themes within the submissions

## Introduction

Analysis of the major and ‘new insight’ submissions by the Consultant, in addition to the summary of the short submissions provided by AHA revealed several common themes. Specific responses to the RIS and the S&G are provided in the Appendices, along with summaries of the ‘new insight’ and short submissions. Hence the focus in this section is on the major submissions, also noting the overall public response where appropriate. It should be noted that a review of the technical information provided with submissions is beyond the scope of this report and the role of the Independent Public Consultation Consultant.

It is clear from the overwhelming number of submissions that the welfare of poultry in Australia generates considerable public interest. As noted by RSPCA Australia, this represents the largest community response to an animal welfare public consultation process.

It is also clear from the submissions that there are significant differences of opinion about the major issues addressed in the RIS and the S&G. The use of conventional cages is particularly divisive, and dominated the submissions. Other issues which received a great deal of attention within the submissions included beak trimming and other painful procedures, slaughter and killing practices, induced moulting and limited access to food and water, stocking densities, lighting for housed poultry, rapid growth of meat birds, provision of water for ducks, and the development of the RIS and S&G.

## The use of conventional cages

The overwhelming majority of the submissions (including the ‘short’ and ‘new insight’ submissions) referred to the use of conventional cages for laying chickens and breeding birds. However, there was a diversity of opinion within the submissions as to whether conventional cages should be used or not. The complexity of this issue is highlighted by the opinion poll within the submission by the Australian Veterinary Poultry Association (AVPA), where 48% of respondents did not support phasing out conventional cages, 20% acknowledged that there are advantages and disadvantages with housing systems and it’s difficult to make a decision either way, and 26% respondent supported a phase out.

A summary of the sub-themes within this theme from the major submissions are outlined below:

- Ban/phase out conventional (battery) cages
  - Battery cages are cruel/unethical
    - Hens are sentient beings
    - No animal belongs in a cage
  - Battery cages do not ensure good welfare/wellbeing, backed by science
    - Cages lead to poor physical health outcomes
      - Cages lead to higher rates of injuries e.g. broken bones
      - Cages lead to higher rates of disease/poor immune function

- Inability to regulate body temperature
    - Cages lead to poor mental states
      - Expression of abnormal behaviours, such as injurious pecking
      - Frustration and distress from a lack of stimulation
    - Cages deny natural behaviours e.g. wing stretching/flapping, nesting
    - Cages don't provide the Five Freedoms
  - Cages have been (or are being) phased out overseas for e.g. EU, Canada, some US states, New Zealand, hence we are out of step with international developments
  - Major food companies shifting to non-cage eggs overseas and in Australia
  - Consumers want cage-free eggs
    - Over 50% of the eggs sold now are labelled as non-cage.
    - Retailers reducing/phasing out caged eggs
  - Community wants cages phased out (as per RSPCA survey)
- Do not phase out conventional (battery) cages
    - Caged hens are treated well/not cruel. Caged egg farmers are committed to good welfare
    - Caged hens have better welfare (when assessed on biological functioning framework)
      - Caged hens have a low incidence of disease/injury
        - Less bone fractures
        - Protection from predators
        - Less use of antibiotics/vaccinations
        - Reduced parasites
        - Less contact with faeces
      - Caged systems have lowest mortality
      - Caged systems have lower rates of cannibalism/feather pecking
      - Less stressful handling, easier to identify sick animals
      - Behavioural needs e.g. perches, dust baths, are unproven
      - High productivity is an indicator of good welfare
    - Biosecurity/hygiene is easier to manage in cage systems
    - Environmental management/protection from environmental conditions is better in cage systems
    - Feed and water supply/quality better in cage systems
    - Eggs from caged eggs are cleaner/safer/less salmonella
    - 50% of Australians choose to buy cage eggs, consumers should have choice
    - Egg prices will increase and place economic burden on families/70% of all cage eggs are bought by people who earn less than the average Australian income/eggs an important source of affordable protein
    - Cages ensure reliable egg supply. If banned, eggs will be less available, potentially leading to imports
    - Phasing out cages will cost industry
      - Australian farmers will be less internationally competitive
      - Financial burden will affect producer wellbeing
      - Needs to be a funding mechanism to achieve this outcome
      - Farmers have already made significant investments to improve welfare

- The cage production system also produces a large proportion of chicken manure fertilizer
- Cage production also produces the base egg pulp product for the production of numerous foods.
- Cage systems have a lower carbon footprint, and require less land
- Cage systems have workplace health and safety benefits
- Modern cage systems have improved welfare/activists use out of date images
- Hens in cages provide high production efficiencies/lower cost of production.

### Phasing out or banning conventional cages

The overwhelming majority of the short submissions called for a ban or phase out of conventional cages, using the term 'battery' cage. These included submissions by, or featuring, children. These submissions stated that housing hens in cages was cruel or did not support good animal welfare due to limiting natural behaviours. In addition to sections within the S&G, reference to conventional cages is made in RIS Option D.

Major submissions from welfare and legal organisations and the majority of submissions from members of parliament and the public also supported a ban or phase out of conventional cages. Welfare organisations provided detailed submissions (for e.g. the RSPCA) with extensive reviews of scientific literature to support the phasing out of battery cages, in particular the recent Farmed Bird Welfare Science Review (FBWSR) by Nicol et al. (2017)<sup>2</sup> commissioned by the Department of Economic Development, Jobs, Transport and Resources, Victoria and which the Drafting Group is encouraged to review.

Submissions calling for a ban or phase out of conventional cages argued that they were unable to support the wellbeing of birds; evidence was presented that birds have higher incidences of injuries and diseases and demonstrate frustration due to being unable to express innate behaviours.

There was disagreement within these submissions however as to the role of furnished cages, with some submissions arguing that furnished cages allow for some expression of innate behaviours without the negative impacts on wellbeing that may be associated with outdoor systems. These submissions also expressed disappointment that furnished cages had not been expressly considered within the S&G (see, for example m46). Other submissions argued that a 'cage was still a cage' and that the limitations on innate behaviours would have a negative impact on wellbeing.

Submissions calling for a ban or phase out of conventional cages noted that they had been banned in several other locales, such as the EU, New Zealand, and some states of the USA. They also noted that global food companies were shifting to non-cage eggs.

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<sup>2</sup> Nicol, C.J., Bouwsema, J., Caplen, G., Davies, A.C., Hockenhull, J., Lambton, S.L., Lines, J.A., Mullan, S., Weeks, C.A. (2017) *Farmed Bird Welfare Science Review*. Department of Economic Development, Jobs, Transport and Resources, State Government of Victoria.  
[http://agriculture.vic.gov.au/\\_data/assets/pdf\\_file/0019/370126/Farmed-Bird-Welfare-Science-Review-Oct-2017.pdf](http://agriculture.vic.gov.au/_data/assets/pdf_file/0019/370126/Farmed-Bird-Welfare-Science-Review-Oct-2017.pdf).



Strong community and consumer support for non-cage eggs was also presented as evidence in support of phasing out or banning cages. A survey undertaken by RSPCA where 80% of Australians indicated support for banning cages was frequently cited, as were sales figures highlighting an increasing market share for non-cage eggs.

There was support for RIS Option D within the submissions, although most expressed that their support was based on the phase out of conventional cages to occur within 10 years rather than 20 and without the option of furnished cages.

### Support for conventional cages

There was strong support among most egg producers and industry associations for continued use of conventional cages. These submissions also included scientific evidence that the health and welfare of birds kept in cages was superior to that in non-caged systems. Several submissions suggested that animal welfare groups were influencing community perceptions by using images of production systems that were out of date and that education about current conventional cage systems was important to ensure their ongoing use in egg production.

These submissions also argued that cage eggs were an affordable source of protein for low-income families and that continued sales of cage eggs suggest that there is strong demand for them. They argued that it was important to maintain consumer choice. They also argued that cage eggs were safer.

These submissions also noted the projected costs to industry and individual producers who had already made significant investments in improving animal welfare in recent years. Removing cages will deliver severe financial burden that will affect farmer wellbeing. Hence there was strong support among producers and industry associations for RIS Option C.

### Beak trimming and other painful practices

As with the use of conventional cages, there were differences of opinion with respect to beak trimming and other painful procedures. In addition to the S&G, reference to these procedures was also made in the RIS, in particular in association with Option G which proposed banning these procedures. The short public submissions showed support for this option.

#### Beak trimming

Most of the public and welfare submissions called for a ban on beak-trimming, using the term debeaking, and some submissions describing it as mutilation. These submissions argued that alternative methods to manage feather pecking should be used, such as lowering stocking densities, environmental enrichment, providing litter, appropriate feeding and appropriate genetic selection. These submissions also called for a ban on second beak trimming.

Some submissions supported the use of beak trimming to prevent feather-pecking and cannibalism provided technical information on beak trimming. For e.g., m20 by Dr Phil Glatz and Geof Runge recommend that there be separate standards/guidelines for hot blade and infrared beak trimming

and provide examples of 'best practice'. Submissions from the AVA and AVPA also supported the inclusion of the hot blade method.

Most submissions supported beak trimming with advice from veterinarians, or undertaken by them for therapeutic reasons, and with use of anaesthesia and pain relief.

This issue also received significant attention within the short submissions. Some submissions only supported the banning of second beak trimming.

#### Castration and devoicing

Submissions generally called for these procedures to be banned. Both welfare groups and veterinary groups supported their ban for commercial poultry.

#### Pinioning

Welfare groups and public submissions generally supported a ban of pinioning.

Veterinary groups, namely the AVA and AVPA noted that pinioning may be justified for pheasants on welfare grounds. Some exhibition poultry submissions supported the use of pinioning for waterfowl that could potentially interbreed with wild birds.

#### Dubbing and desnooding

Welfare and public submissions supported a ban on dubbing and desnooding for cosmetic purposes, and suggested that alternative methods be used to reduce the risk of injury, especially in turkeys.

There were a large number of submissions from exhibition poultry breeders which were almost unanimously (with one exception) in favour of dubbing, stating that it was justified on welfare grounds as it reduces the surface area of skin prone to infections. They also stated that dubbing on day-old chicks was not feasible and should be done up to 16 weeks of age.

#### Toe trimming/marking

Some submissions were opposed to toe trimming, however there were some submissions that suggested it improved the welfare of turkeys by preventing back scratching. Toe punching is also used by some exhibition breeders for identification purposes.

#### Surgical procedures

Exhibition poultry breeders requested clarification of 'surgical procedures'. They also noted that there is no registered product for pain relief for poultry.

#### Slaughter/killing practices

A large number of submissions addressed issues to do with killing and slaughter practices for poultry. Welfare and public submissions expressed concern about the disposal of male chicks, in particular by maceration and gassing. Submissions advocated for alternative methods such as in-ovo gender identification to avoid large numbers of layer chicks being killed, and commented that other countries around the world are working to phase out the routine slaughter of male chicks. Voiceless

noted that the killing of male layer chicks is also a source of public outrage, as shown by the vocal backlash following the release of the first Australian footage of maceration in July 2016.

Welfare and public submissions also expressed concern about the shackling of birds (in particular heavy birds such as turkeys) and electrical water bath stunning and throat cutting during slaughter and suggested alternative and 'less cruel' slaughter methods such as controlled atmosphere stunning or low atmosphere pressure stunning to reduce handling, stress and injuries to birds. Welfare and public submissions also called for a mandated standard for independently monitored CCTV in abattoirs to ensure humane treatment/killing.

Industry groups such as ACMF agreed in principle with video surveillance in the live bird handling part of the processing plant, noting that the major meat chicken processing plants in Australia already have video monitoring in this area to ensure that any inappropriate handling of birds can be detected and acted upon.

## Stocking densities

There was a difference of opinion between the submissions about the appropriate stocking densities for poultry in different production systems. In addition to the S&G, reference to stocking density is made in RIS Option E.

Welfare and public submissions supported decreasing stocking densities for all species so that each individual bird has enough room to move and express innate behaviours. The RSPCA provides a number of publications, including the FBWSR, as evidence supporting that reduction in stocking density improves welfare.

However industry associations state that the science on the issue is contested or unclear; specifically G Millar (m37) cites a recent AgriFutures review that states that other factors take precedence or interact with density to influence welfare.

## Induced moulting and limited access to food and water

Although this heading covers two practises involving restricted feeding of two distinct populations of birds (i.e. Induced moulting in laying hens – in which hens at the end of a lay cycle are induced to moult and then come back into lay for the next cycle; and alternate day feeding for meat chicken (broiler) breeders to control weight, many submissions referred to both practices together. There was strong opposition to induced moulting and 'skip-a-day' feeding from welfare groups and the public, who said within the submissions that deliberately withdrawing food and water was cruel and posed a welfare risk to poultry as they experience hunger and frustration. Broiler breeders in particular were described as having a 'high metabolic rate' and appetite and so alternate day feeding was felt by some submitters to be inhumane. Submissions also noted that forced moulting was reportedly uncommon in Australia, that it was banned in other locales, and that food companies were moving to eliminate the practice from their supply chains. Submissions argued that poultry should have access to food and water at all times.

Conversely alternate day feeding was seen as an important tool by producers in order to control weight in broiler breeders and avoid health issues from being overweight. The APVA recommended the use of the term 'alternate day feeding' as opposed to skip-a-day feeding within the S&G, and

commented that the glossary definition be changed to reflect that it applies to meat breeder chickens and not broilers.

## Lighting

A number of submissions addressed the issue of lighting for housed poultry. Public, welfare, and legal submissions called for increasing the light intensity for housed birds from 5 lux to at least 10 lux for most species/types and ages of birds, particularly meat birds. Similarly, these submissions also tended to call for increasing the duration of the minimum dark period from 4 hours to 8 hours. However, industry submissions noted that reducing light intensity was an important tool for managing feather pecking in turkeys and breeder birds. In addition, several submissions suggested (with supporting evidence) that different lighting regimes with more than one dark period in 24 hours had been shown to improve welfare.

## Rapid growth of meat birds

Welfare and public submissions expressed concern about the rapid growth rates of meat birds and advocated for the use of slower growing breeds. The submissions argued that this would alleviate health problems associated with rapid growth, and the need for feed restriction. RSPCA recommended that standards, or at the very least guidelines be introduced to place limits on the growth rates of meat chickens.

## Water for ducks

There was strong support within the public submissions (including the short submissions) as well as within the submissions from welfare groups for the provision of water for ducks to be able to submerge their heads and swim. However, it was acknowledged by the AVPA and others that providing ducks with water to wet their heads and preen may lead to contaminated water and wet litter which may in turn contribute to disease. The development of alternative systems that meet the needs of ducks without increasing the risk of disease was advocated in some submissions.

## Development of the RIS and the S&G

A number of submissions expressed views on the development process of the RIS and the draft S&G. While industry associations expressed support for the S&G, welfare, legal and public submissions expressed concern.

Welfare and legal groups expressed the view that the proposed S&G did not deviate significantly from the Model Code of Practice (MCOP) and largely reflects current industry practice. They suggest that the review process did not involve an independent review of current animal welfare science, such as the FBWSR, and in particular ignores the evidence in support of phasing out conventional cages.

Welfare groups, legal groups and public submissions generally expressed concern about the involvement of industry groups in the development of the RIS and S&G. RSPCA in particular expressed concern about data provided by industry representatives being used in economic modelling, and provided alternate methods of deriving costings associated with the RIS options.

In addition, several submissions expressed concern about reports in the media questioning the transparency, governance and independence of the process. Public submissions also included calls for an independent animal welfare regulator.

Exhibition poultry breeders expressed concern about the lack of consultation with the S&G for small poultry breeding operations and pet poultry and requested some exemptions for these groups from the S&G.

Other groups, for example AFSA, expressed concern that alternative poultry raising systems, for example rearing poultry outdoors on pasture was not considered, and that there is no data to reflect these operations.

## Summary and recommendations

A key tension within the submissions is how to evaluate and provide a 'life worth living' for Australian poultry in production systems, particularly whether 'protection' from harmful factors through the use of conventional cages is 'better for hens' than the ability to express natural behaviours in alternative systems with other risks to animal health and welfare. As one submitter (m8) expressed it:

*"... there is no objective way of establishing whether increased mortality in free range layer hen housing is 'worse' for animal welfare than preventing the animal from being able to carry out its normal behaviours by keeping it in a battery cage for the entirety of its life. Striking that balance, once the science is known, is in fact an ethical and political consideration."*

It should be noted that many submissions debate whether these attributes are characteristic of each production system and this is where much of the technical evidence provided in the submissions has been deployed. Several submissions note that there are welfare issues in all systems, that the factors that contribute to welfare are complex and interact, and that management is a key factor in providing good welfare.

The other key tension within the submissions is balancing the welfare needs of poultry with the needs of the community, and particularly balancing community support for changing production practices with the projected costs of industry change. This is arguably a tension between those who advocate for a change in production system, and those who would have to bear most of the costs of industry change.

It is beyond the scope of this review to provide recommendations on any of the Options within the RIS or proposed changes within the submissions to the S&G. Given the diversity of opinions expressed within the submissions it will take careful consideration of the evidence provided within the submissions. The tables provided in the Appendices provide a summary of the detailed submissions relevant to the Drafting Group and note where technical and other information has been provided. The Consultant recommends that the Drafting Group, under the direction of AWTG, review the technical information provided in the submissions in order to evaluate them in light of the decision-making principles and the objectives of the review.

# Appendix 1 – Support/opposition for RIS options

Major submissions only. Organisation acronyms are listed on page 10. The full list of major submissions is provided in Appendix 6.

Support for Option A: Maintain the status quo		
Code	Submitter	Submission
m31	Solar Eggs Pty Ltd	I support Option A.
Opposition to Option A: Maintain the status quo		
m22	EFA	Option A would require no change from industry. EFA members take pride in ensuring animal welfare, but have always considered continuous improvement to be a necessary condition of their pastoral role in caring for animals. In this respect EFA is pro-reform and pro-improvement and considers 'doing nothing' as failing the test they have set for themselves. Option A does not provide a sufficient net community benefit.
m43	CEPAWA	As noted in the RIS, Option A requires no change, we acknowledge that change is required as a necessary step forward. Option A does not provide a sufficient net community benefit
m92	Hon R Mazza MLC	Do not support Option A.
n34	D Smith	Frustrated this option is even one of the proposals.
m65	Animals Aust	Unacceptable for the many reasons indicated [in the full submission]. The welfare of over half a billion commercially farmed birds is currently compromised due to housing and husbandry deficiencies.
m73	AVA	This is not supported. The MCOP is long overdue for a review based on contemporary animal welfare science.

## Support for Option B: Convert the proposed national standards into national voluntary guidelines

m64	ACMF	The ACMF believes that Option C (with the addition of option G, but <i>without</i> the addition of any other options D – F) comes closest to achieving the best combination of welfare benefits and costs. However, several changes need to be made, and in two instances, phase in periods to be applied, before the standards will truly achieve an appropriate balance between these factors. Without the changes / phase in periods identified in [our submission], we would argue that the costs of Option C do not justify the potential benefits, particularly as the way they are currently worded could lead to prosecution of farmers for petty or uncontrollable situations which have minimal or no impact on bird welfare and in some cases could result in perverse outcomes. Some of the changes proposed [in our submission] seek to strengthen the standards from a bird welfare perspective. Without these changes our position is that the proposed standards and guidelines should become guidelines only (i.e. Option B), as the potential benefits do not outweigh the costs.
m108, m76, m14	Exhibition poultry	Support Option B.
m12	Annie's Free Range	Our preferred option from those listed in the RIS, is Option B.
m129, m213	J Barr; B Tolentino	I support Options B & C, although Option C will provide the greatest net benefits to poultry welfare in Australia and will provide for better consistency between the states and territories.

## Opposition to Option B: Convert the proposed national standards into national voluntary guidelines

m198	R Lauder	Concerning the RIS, Option B is disingenuous as revealed by the statement in the RIS that 'market signals will generally cause welfare standards to fall below community expectations in the absence of regulation'. The RIS later states that 'because animal welfare is evidently a public good externality there is an obvious role for government policy in establishing and enforcing standards'.
m22	EFA	EFA members take animal welfare seriously and the standard of care on EFA farms would be consistently high. However, EFA does not represent every single Australian egg farmer and it accepts that there can be poor performers. It is a matter of fact that public interest in animal welfare is increasing and that with that interest comes an associated shift in the moral mindset of the public. EFA welcomes this interest and is committed to meeting public expectations for improvements. Option B does not provide a sufficient net community benefit.

m92	Hon R Mazza MLC	Do not support Option B.
n34	D Smith	Opposed. This option doesn't allow guidelines to be implemented.
m43	CEPAWA	Would like to see developments in the implementation of animal welfare 'must' and 'should' statements are no longer practical in ensuring all farmers maintain proper animal welfare. Option B does not provide a sufficient net community benefit.
m65	Animals Aust	Unacceptable on the grounds that the S&G are themselves inadequate, but to attempt to increase compliance with even minimum standards enforceable regulations (an enforcement) is needed. As indicated in the RIS, market failure is a substantive risk given the ability for poultry farmers to be financially viable even when the health and welfare of birds is compromised.
Support for Option C: Adopt the proposed standards as currently drafted		
m73	AVA	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.
m25	QUEP	QUEP supports Options C because it is the only option costed in the RIS that is responsive to the regulatory problem and has a positive net community benefit.
m15	C Zulu	My research indicates there will be a higher percentage of mortality if cages are banned due to more hens being housed in free range or barn sheds that experience higher mortality.
m53	J Ironside	Would provide assurance to egg farmers to continue to invest in the industry, providing customers with the choice they surely deserve.
m112	ANRPB and stakeholders	The ANRPB confirms its support for Option C of the RIS.
m92	Hon R Mazza MLC	Support Option C.
m43	CEPAWA	[Summarised] In WA, farmers support Option C of the RIS. Correct and good farming allows for high production and low mortality, with each of the production systems there are advantages and disadvantages present. Throughout the public consultation animal welfare groups and the WA Government have indicated support to phase out caged eggs (Option D). Caged production continues to play an integral part of egg



		<p>production in WA. There has been substantial investment in free range farms. The process of moving from a caged farm to barn or free range is impractical for farms throughout WA ranging from smaller to large WA caged producers.</p> <p>With Option C, the draft standards being mandatory will for the first time provide a consistent approach to ensuring animal welfare outcomes are met. This is important as it provides clarity for farmers and consumers as to obligations that farmers must meet. This will ensure good and proper husbandry by farmers and legal accountability to those who are not practising at the set standards. A nationally mandated welfare standard will ensure industry regulations are followed by all egg producers. We will see the same obligations by producers with a few thousand birds, to producers who have a few million.</p> <p>Option C of the RIS is nationally supported by the egg industry. It will be a cost for WA farmers, it requires improved animal welfare outcomes for the 1.9 million hens in WA, although costs are outweighed by improved animal welfare outcomes. It is a sustainable and realistic approach to making necessary changes in the egg industry. Option C does provide a sufficient net community benefit.</p>
m61	SBA	SBA is supportive of Option C.
m66	Ingham's Turkey	<p>We are supportive of Option C, a legally enforceable set of standards consistently implemented nationally, provided certain changes detailed in [our] submission as well as the submission by the ACMF covering broader concerns also affecting the meat chicken farming (see the second Ingham's submission) are made.</p> <p>The ACMF believes, and Ingham's agrees, that Option C (with the addition of option G, but without the addition of any other options D – F) comes closest to achieving the best combination of welfare benefits and costs. However, several changes need to be made in addition to the TURKEY specific changes listed [in the submission], and in two instances, phase in periods to be applied, before the standards will truly achieve an appropriate balance between these factors.</p> <p>Without the changes / phase in periods identified in [our submission] we would argue that the costs of Option C do not justify the potential benefits, particularly as the way they are currently worded could lead to prosecution of farmers for petty or uncontrollable situations which have minimal or no impact on bird welfare and in some cases could result in perverse outcomes.</p> <p>Some of the changes proposed [in our submission] seek to strengthen the standards from a bird welfare perspective. Without these changes our position is that the proposed standards and guidelines should become guidelines only (i.e. Option B), as the potential benefits do not outweigh the costs.</p>
m67, m120	Ingham's chicken meat; A Parnham, Ingham's	We are supportive of Option C, a legally enforceable set of standards consistently implemented nationally, provided certain changes detailed in the submission by the ACMF and also reflected in this submission and those reflecting the turkey industry's concerns (see Ingham's Turkey submission and the submission by the Australasian Turkey Federation) are made.

m74	Aviagen	Aviagen Australia broadly supports the proposed animal welfare S&G as they are presented in the draft Australian Animal Welfare Standards and Guidelines for Poultry. In responding to the RIS, this would be Option C. Aviagen Australia believes the Standards proposed will ensure a high standard of welfare for Australian poultry flocks.
m88	CEFASAT	<p>Our members support Option C of the current standards in its present draft. We feel it reflects the nature of the high standard farming practices in all 3 forms of egg production. Farmers feel that changes to the draft raises serious concerns and would place farmers in a position of further ongoing business uncertainty. Any changes will have a substantial effect on the ongoing investment required to provide future sustainability of affordable eggs to consumers and has the potential to inhibit industry growth. CEFESAT Members support Option C to replace the MCOP.</p> <p>We request that due consideration is given to our concerns as egg farmers and that a ‘true understanding’ of farming practices forms the basis of any Government decisions.</p>
m102, m148, m193, m195, m214, m215, m216	Multiple egg producers	<p>[Summarised] As an industry we have shown that we are responsive to customer needs and changes in practice to achieve better animal welfare outcomes. I think the Standards and Guidelines will help us continue to improve and help ‘weed out’ any rogue operators that don’t do the right thing and tarnish the image of our industry.</p> <p>As such, I support Option C.</p> <p>I know that our industry has not done enough to tell our story and we need to do something about it. I think implementation of Option C us an excellent opportunity to do more to educate the egg eating consumers about egg farming so they can feel ok about buying eggs from whichever production system they choose.</p>
m199	R Nicolaisen	I think the implementation of Option C gives us an excellent opportunity to do more to educate consumers about egg farming and the practices used. Regardless of the production method, consumers need choices and value given to their choice without judgement. This can only be achieved on an open and fair platform free of criticism and negativity.
m22	EFA	[Summarised] After widespread consultation, careful consideration of the evidence, and determined efforts to confer with stakeholders, experts and vested interest groups, in relation to the options provided by AHA in the RIS, EFA supports Option C. Option C delivers on EFA’s commitment to the community; it is responsive to the problem which this regulation seeks to resolve, and allows reform to be undertaken in a sustainable manner. EFA views its support for mandatory standards as central to the promise to always improve. In addition to making these standards compulsory, EFA welcomes the shift from a voluntary and specification-based set of codes to a mandatory and outcomes-based set of standards. This is wholesale reform and it is supported by farmers.

		<p>EFA is calling on all state governments to support Option C. It is the only option costed in the RIS that (i) is responsive to the regulatory problem and (ii) has a positive net community benefit.</p> <p>While industry needs to see Option C mandated, it is committed to keep improving. That means that EFA is comfortable in suggesting in principle, that any new cages should include behavioural enrichments. EFA would suggest that retaining the current stocking density and ensuring the provision of a perch and a nest box are feasible. EFA thinks it appropriate that this commitment be simply added as a single additional item to the current standards.</p> <p>Option C will cost farmers. While they would hope for a common-sense solution to the problems faced by beak-treatment, the mandating of standards has an economic cost that will be shouldered by farmers. However, EFA suggests that the improved welfare outcomes outweigh the implementation costs.</p>
m23	G Merrick, Golden Eggs	I am writing in support of Option C as it provides the best welfare outcome for laying hens.
m75	Legion Trial Pty Ltd	We support Option C, where all farmers will be made accountable for their farming practices no matter the size of their operation or their farming system. We also support the standards being mandated in law without exemptions as too many farmers these days fall under the radar and hide behind the term free range and free range alone does not result in better animal welfare [more detail provided in the full submission].
m77	J Spencer, Days Eggs	Having worked in all 3 systems myself and knowing the pros and cons of them all, I am completely in favour of Option C. I believe that the draft S&G as it stands is written well, it is easy to understand and it outlines all the necessary requirements that must be met in order to provide good animal welfare to our hens, taking into account what actually defines good animal welfare. I believe that Option C will help use move forward to bring about change and consistency across all egg farms in Australia and help us to improve our current systems in a way that leaves room for all of them to co-exist in the Australian Egg Industry.
m12	Annie's Free Range	We accept that Option B is unlikely to happen so our next preferred option is Option C without any of Options D, E, F or G. This is because Option C gives the minimum cost to the industry or the consumer or government for the greatest change, as 50% of standards are new when compared with the current MCOP.
m158	P Bell	I write in support of Option C as outlined in the RIS. <u>[Also makes comment on the S&amp;G process and the FBWSR. DG to review]</u> .
m204	VFF	VFF supports option C in the draft RIS, which is to adopt the proposed S&G as currently drafted. This would enshrine the S&G in legislation, supporting all egg farming systems. As the research in the RIS for option C indicates, this option is effective in promoting industry wide standards, which would have a positive effect on the economy by reducing transaction costs of compliance. This option would also facilitate improved consistency of poultry welfare outcomes across the country. As indicated in the RIS page 63 – this option would see improvements

		<p>in the welfare of animals with respect to protection from injury, fear and distress as a result of increased compliance from explicitly stating implied standards of care.</p> <p>Famers have invested approximately half a billion dollars throughout the last decade in upgrading cages to make them better for our hens. Under Option C poultry welfare benefits can be maintained with net compliance costs of \$709.72 million. This is estimated to be the least expensive option and feasible for industry.</p>
m37	G Millar, AgriFutures Australia	The AgriFutures Australia Chicken Meat Panel are agreed that [Option C] provides the best approach to consistent progress in this area. This option includes some new standards that reflect the outcomes of science or reviews of science that are relevant to an Australian context because they were supported by AgriFutures Australia <a href="#">[see the submission for additional technical information]</a> .
m98, m68	B Williams, ACGC	Option C with changes suggested in [our] submission. Changes discussed for option G above with option C has merit [see also responses to RIS questions 11 and 16].
m129, m213	J Barr; B Tolentino	I support Options B & C, although Option C will provide the greatest net benefits to poultry welfare in Australia and will provide for better consistency between the states and territories.
n47	N Burke	[Summarised] I attended consultation groups. No evidence that cages do not conform with welfare standards. The costs to industry for change is exorbitant. The industry would be in crisis if cages were phased out.

### Opposition to Option C: Adopt the proposed standards as currently drafted

m65	Animals Aust	Unacceptable as outlined throughout this submission. The S&G fails to reflect the current accepted scientific animal welfare literature and opinion, community and corporate expectations, or internationally accepted standards for farm animal welfare (even the minimum OIE animal welfare principles).
n34	D Smith	I don't think Option C is enough. It would require multiple caveats to be added to get my support.
m73	AVA	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.

Support for Option D: Vary the proposed standards to phase out conventional cages for chicken layers over 10 or 20 years in favour of alternative systems or furnished cages.

m65	Animals Aust	Animals Australia supports the element of this option which envisages a 10-year phase out of cages for layers on the substantive grounds provided in [our] submission.
n27, n34	H Johnston; D Smith	Support this option, but only if cages are phased out over 10 years as opposed to twenty years. Also, don't support the option of furnished cages.
m35	Ag and Food WA	Conventional cages should be phased out over a 10-year period (Option D). No new conventional cages should be installed from 2019. Existing conventional cages should be removed by 2029. The advantages of housing for biosecurity and other health-related matters can be maintained while making provision for the behavioural needs of laying hens by phasing out conventional cages. If cages are to be used in future, they should be furnished to satisfy not only the physiological, but also the behavioural needs of poultry (Option F). The development of minimum standards for enriched cages, including the provision of furnishings and increased space allowances, is also recommended.
m118	Group submission (see Appendix 6)	Our primary submission is that all forms of battery farming of hens should be phased out over the next several years, including furnished enclosures. Accordingly, we support a modified Option D, without furnished cages as an option and with phasing out to occur within 10 years (not up to 20 years as referred to).
m34	Voiceless	Voiceless partially endorses Option D. However, Voiceless expressly disagrees with the proposed timeframes of 10 or 20 years to phase out the use of cages, and instead advocates for a significantly earlier deadline that would still allow industry to adapt without causing undue extending suffering for poultry. Voiceless also supports extending this phase-out to include all caged systems and does not support a transition to furnished cages. Furnished cages are an insufficient solution to welfare concerns, as they present a number of the same welfare issues as conventional cages. For example, poultry in furnished cages are still subject to extreme confinement and high stocking densities, which obstruct a hen's ability to perform natural behaviours regardless of furnishings and prevent poultry from escaping feather pecking or bullying.

## Opposition to Option D: Vary the proposed standards to phase out conventional cages for chicken layers over 10 or 20 years in favour of alternative systems or furnished cages

m12	Annie's Free Range	Option D disadvantages the consumer – especially those who are less well off – without giving a commensurate advantage to the birds (who are at that position now) and greatly disadvantaging the farmer. Option F is a variation on Option D as it is trying to increase costs to farmers.
m204	VFF	VFF does not support Option D which considers a 10-year phase out of cages. This option is not only very costly with an estimation of \$1,531.89 million net compliance costs but also doesn't prove any extra welfare poultry benefits. A phase out of cages to accommodate a mandatory ban of cage systems is an unnecessary and exceptionally drastic measure. More so in particular after an industry investment upgrade of cage infrastructure, where well managed caged systems that have high levels of hen health and bio-security already meet national standards. As outlined in the RIS on page 65 to phase out cages over a 10 or 20-year period may also lead to negative animal welfare outcomes. Serious consideration needs to be given to the impracticalities of banning cages and the enormous loss of production that would result. This in turn would significantly increase the price of eggs, increasing the financial burden of industry change on government and consumers.
m22	EFA	<p>[Summarised] Any move to phase out all cage farming in Australia would make Australian egg farmers the least internationally competitive egg farmers and would threaten industry stability. This suggestion raises food security issues, create egg shortages and increase the price of protein. [See the submission for more information]</p> <p>The RIS notes that support for Option D would have an economic impact of more than a billion dollars. Transition comes at a cost and any adoption of Option D would see family farms forced off the land. Option D does not provide a net community benefit.</p>
m43	CEPAWA	[Summarised] Option D will have a significant impact on WA industry. 53% of eggs consumed in WA are caged eggs, this demonstrates there is still a market in WA for caged eggs. Any reform should be based on market demand and a Government induced obligatory exit from caged eggs will impede on consumers rights to choose which eggs they would like to buy. A financial burden will be placed on WA farmers if compensation is not forthcoming to meet infrastructure costs. Option D does not provide a sufficient net community benefit.
m25	QUEP	Actively does not support Option D, an option that will make eggs more expensive and remove the ability of consumers to make their own choices about which egg is right for them.
m92	Hon R Mazza MLC	Do not support Option D.

m73	AVA	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.
m74	Aviagen	Although none of Aviagen's flocks are caged and the meat chicken industry generally does not cage its birds, there is a concern that the phasing out of cage farms will increase the proportion of large flocks of chickens kept outside and with it the likelihood of exotic disease, particularly avian influenza. The last two outbreaks of avian influenza in this country have been in free-ranging layer stock and led to the destruction of large numbers of birds and major disruptions to industry. A better option would be to insist that all flocks over a certain number be housed in biosecure facilities and then determine how the birds were managed within the shed for the best animal welfare outcome, be this cages or not.
m136	DA Hall & Co	[Summarised. <u>See the full submission which includes confidential commercially sensitive information which has been removed for the purposes of this report</u> ]. The phase out of cages is of particular concern and raises some very serious issues. To convert from conventional caged to barn will cost us [millions]. It will be very difficult to secure that level of funding on a business model of higher production costs and lower returns. The potential banning of cages would also require us to develop [several] new farms. In addition to associated costs, the development approval process is slow. There are also difficulties with recruitment of suitable additional labour.
m77	J Spencer, Days Eggs	My belief from a business sense is that phasing out cages as outlined in Option D will only serve to firstly severely reduce the availability of eggs to the Australian consumer (for us cage eggs still make up approximately 52% of all eggs sold) which in turn will drive up the price of eggs and make them unaffordable to the average consumer, and secondly create instability with farmers who have invested heavily in cage systems potentially causing them to close their doors putting Australian business owners out of business.
Support for RIS Option E: Vary the proposed standards to reduce maximum stocking densities in barns or sheds for non-cage layer hens to 9 birds per m <sup>2</sup> and meat chickens 30kg/m <sup>2</sup>		
m35	Ag and Food WA	To assist in meeting the behavioural needs of meat chickens and otherwise improve welfare outcomes, Option E is supported, i.e. a decrease in recommended maximum stocking density for broiler chickens housed in non-cage systems.
m29b, m115a	RSPCA	[Summarised. <u>See the full submission for detailed information. DG to review</u> ]. The RSPCA supports a reduction in stocking density for meat chickens to: 34kg/m <sup>2</sup> for tunnel ventilation systems; and 28kg/m <sup>2</sup> for natural ventilation systems. And a reduction in stocking density for layer hens to: 9 birds/m <sup>2</sup> of the usable area for tiered systems; and 7 birds/m <sup>2</sup> of the usable area for floor-based systems. We provide scientific evidence supporting these densities in [our] submission.

		As with Options C and D we have concerns regarding the over-reliance on undisclosed data from industry for the development of basic assumptions contained in the RIS.
m65	Animals Aust	Animals Australia supports this option on the animal welfare grounds indicated above, which would provide more space and welfare increments for some 78% of meat chickens in Australia and assist the welfare of hundreds of thousands of barn housed layers.
<p>Opposition to RIS Option E: Vary the proposed standards to reduce maximum stocking densities in barns or sheds for non-cage layer hens to 9 birds per m<sup>2</sup> and meat chickens 30kg/m<sup>2</sup></p>		
m37	G Millar, AgriFutures Australia	We are strongly opposed to Option E, which suggests a reduction to a stocking rate of 30kgs/m <sup>2</sup> . The reasons for this are twofold. Firstly, the associated adoption costs for this option would be excessively high for the industry to absorb but secondly, there is no clear scientific evidence to support that a reduction to this level would improve bird welfare outcomes and in fact may result in the contrary. A recent AgriFutures Australia funded review of Australian and International literature [see full the submission] identified that variations in current permissible stocking rates (e.g.42kgs in the EU & 40kgs in Australia) were affected by many factors and reported that “such variation in permissible stocking densities reflects policy-makers and scientists views that stocking density alone does not determine welfare outcomes. A large number of variables in addition to ambient conditions may take precedence over or interact with density to influence welfare, including strain of bird, litter type, quality of management, lighting and feeding schedules.” The report concludes that “taken together, these studies indicate that under commercial conditions, stocking density has little effect on several key welfare indicators (mortality, walking ability, skin conditions, jostling) at densities used in Australia.
m22	EFA	EFA notes that this option would have a ten-year economic impact of around \$1.5 billion. The science on this issue appears to be contested and there is clearly no basis or justification for such reform. Option E does not provide a net community benefit.
m43	CEPAWA	Believe that science on the issue of stocking density appears to be contested and reducing stocking density would have a significant impact on WA producers in both production and loss of potential earnings. Option E does not provide a sufficient net community benefit.
m92	Hon R Mazza MLC	Do not support option E.
m120	Ingham’s chicken meat	Proposing a reduction in maximum density for meat chickens to 30kg/m <sup>2</sup> involves a very heavy economic cost as well as an increased environmental burden. While Ingham’s farms are at a maximum density of no more than 34kg/m <sup>2</sup> , I believe there is no conclusive scientific evidence supporting such a significant reduction from its current value of 40kg/m <sup>2</sup> to 30kg/m <sup>2</sup> . I therefore strongly reject Option E’s greatly reduced density for meat chickens. However, Ingham’s would be supportive of a reduction of the maximum density to 38kg/m <sup>2</sup> as part of the holistic approach to broiler husbandry that we are advocating. In this context, it is important to recognise the significant difference between the national Animal Welfare Standards and Guidelines (with enforcement by law) and the voluntary participation in FREPA [Free Range Egg &



		Poultry Australia] and RSPCA higher welfare schemes, as well as the emerging private standards imposed by major customers. While we farm at a density of no more than 34kg/m <sup>2</sup> , we believe the national standard should remain at a higher level because the animal welfare benefits gained from a reduction below 38-40 kg/m <sup>2</sup> are small compared to the effect of good animal husbandry.
m74	Aviagen	Aviagen supports the proposed density standards as proposed in the draft S&G. For our particular circumstance this means the 30kg/m <sup>2</sup> for breeders in a non-cage system. We note this is carried over from the current MCOP and is broadly in line with international standards. The '9 birds/m <sup>2</sup> ' figure in this option cannot take into account differences between breeding lines. Aviagen also questions the validity of the option to reduce meat chicken density to 30kg/m <sup>2</sup> . We are unaware of any literature that supports this particular density independent of the effects of type of housing or standard of management. The proposal ignores the significant improvements in the breeding, housing and management of meat chickens over the past two decades and if adopted would act to penalise producers that have invested in modern controlled environment housing. Given the correct environment, modern breeds of meat chickens will develop to their full genetic potential at the densities proposed in the draft S&G, they do not exhibit of the signs of stress or overcrowding that inhibit their potential growth rate and efficiency. Any reduction in permitted density would inevitably lead to a new housing being of a much lower standard than has been the case, exposing birds to the extremes of temperature, humidity and air quality that were the norm in older style sheds.
m129, m213	J Barr; B Tolentino	I have experience with growing meat chickens and am responsible for their care and welfare. I strongly believe that I am able to grow meat chickens at the current maximum stocking densities without compromising their welfare. Any reduction in allowable densities will have flow on effects on the densities in all current systems and will have a big impact on profitability and viability of the business that I'm involved in. Being able to continue to grow chickens at the current densities is also very important for me to continue to work in the industry and maintain its profitability.

### Support for RIS Option F: Vary the proposed standards to require the availability of nests, perches and litter for all chicken layers in cage and non-cage systems

m29b, m115a	RSPCA	Option F considers the requirement for furnishings such as perches, nest boxes, and litter to be provided for all chicken layers. In effect, this option requires a phase out of conventional cages as, by definition, a conventional cage is one that does not include furnishings. RSPCA Australia supports the requirement for furnishings to be provided for all chicken layers as discussed in further detail with reference to scientific support in [our] submission.
m35	Ag and Food WA	The advantages of housing for biosecurity and other health-related matters can be maintained while making provision for the behavioural needs of laying hens by phasing out conventional cages (Option D). If cages are to be used in future, they should be furnished to satisfy not only the physiological, but also the behavioural needs of poultry (Option F). The development of minimum standards for enriched cages, including the provision of furnishings and increased space allowances, is also recommended.

m65	Animals Aust	<p>Animals Australia supports this option in principle, and particularly if it is implied to introduce these incremental and important improvements in the near future (i.e. be introduced as the same time as the new Standards, not phased in over 10 or 20 years).</p> <p>However we do not support cages, including ‘furnished cages’. Furnished cages allow layer poultry access to only limited behavioural repertoires, and still restrict birds enormously.</p>
m73	AVA	Poultry have strong motivation to forage, stretch, nest and roost. Provision of enrichment to meet these important behavioural needs is supported.
m34	Voiceless	Voiceless endorses Option F to vary the proposed S&G to require the availability of nests, perches, litter and dustbathing for all laying hens in all systems. These elements are indispensable to achieve even the most basic level of animal welfare, as each serves an essential and primary behaviour of hens.
<p>Opposition to RIS Option F: Vary the proposed standards to require the availability of nests, perches and litter for all chicken layers in cage and non-cage systems</p>		
m22	EFA	<p>While Option F avoids most of the welfare complications arising from the calls for egg farming without cages, the economic risks are far more acute. Farmers have tried to grapple with how such a move could be achieved and EFA undertook lengthy deliberations on possible models of implementation. Ultimately, a \$935 million cost has overwhelming practical constraints. EFA notes that this change has been adopted in Canada, the EU and more recently in NZ. These countries are intuitively comparable to Australia and it is useful to examine the nuances between those countries and Australia to ensure a factual footing for consideration.</p> <p>EFA is not opposed to furnished cages - they retain the welfare benefits of a controlled environment and in circumstances where the market was stable, some farmers could make this move. But EFA holds that any mandated process for this change would either force farmers out of the industry or place them in an untenable economic situation. EFA would be happy to work with governments on such reform in circumstance where our debt was repaid, and the market had stabilised.</p>
m43	CEPAWA	<p>Future investment in infrastructure where there is market uncertainty cannot be justified, the costs of upgrading simply cannot be afforded. CEPAWA is not opposed to furnished cages, however we believe a mandatory process would close farms or put farmers in a weak economic situation. Option F does not provide a sufficient net community benefit.</p>
m92	Hon Rick Mazza MLC	Do not support Option F.

m136	DA Hall & Co	Introduction of nests and perching in all chicken layer systems is not possible in the current conventional cage systems and would require the removal of all existing cages and replaced with furnished cages. Similar to the cage to barn scenario, there would be significant loss in bird carrying capacity in the existing sheds and additional layer and rearing capacity would have to be established.
Support for RIS option G: Vary the proposed standards to ban castration, pinioning and devoicing, hot blade beak trimming at hatcheries, and routine second beak trim – unless there are exceptional circumstances		
m29b, m115a	RSPCA	The RSPCA supports a prohibition on routine beak trimming with allowance for justified exceptional circumstances. Further detailed information regarding our position on beak trimming and the proposed standards is provided in [our] submission.
m37	G Millar, AgriFutures Australia	Option G in principle seems a reasonable addition to Option C for the chicken meat industry, although it is not an area in which AgriFutures Australia has supported research.
m65	Animals Aust	Animals Australia supports this option, though note these changes [are not] sufficient to protect the welfare of birds.
m73	AVA	<p>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.</p> <p>Pinioning – may prevent injury in Pheasants and so should only be permitted in Pheasants if justified on animal welfare grounds.</p> <p>Hot blade beak trimming in hatcheries – infra-red at day old is preferred.</p> <p>Routine 2nd 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.).</p>
m74	Aviagen	Please note that none of these practices are employed in the modern meat chicken industry. Aviagen Australia believes that, with some minor clarifications and editing, Option C (along with the proposals in Option G, if considered necessary) best meets the need to provide acceptable animal welfare standards for the chicken meat industry.
m34	Voiceless	Voiceless endorses Option G. Voiceless' endorsement is conditional upon the provision of pain relief where beak trimming is performed, and recommends the inclusion of 'the use of blinkers or blinders' in the list of prohibited practices.

n27	H Johnston	Proposed variations need to go further. Pinioning, devoicing, and castration are already banned in Victoria on animal welfare grounds, but should be national. Better husbandry and genetic selection could better address the problems. I also disapprove of routine second beak trimming.
<p>Opposition to RIS option G: Vary the proposed standards to ban castration, pinioning and devoicing, hot blade beak trimming at hatcheries, and routine second beak trim – unless there are exceptional circumstances</p>		
m22	EFA	EFA encourages greater communication with those involved poultry show-based care and hobby-based enthusiasts. EFA is concerned about the small business impacts of banning hot blade treatment in hatcheries and the problems with these operators obtaining IRBT machines. However, we acknowledge the concern around this issue, we understand that new technology is available and we will continue to examine how the farming sector can best respond to concerns on a non-regulatory basis. Option G does not provide a net community benefit.
m12	Annie's Free Range	Option G in regard to the use of the hot blade, disadvantages small hatcheries.
m43	CEPAWA	Egg farmers are not involved in castration, pinioning or devoicing. Happy to work on a plan alongside national peak body Egg Farmers of Australia to see hot blade treatment at hatcheries phased-out over time, whilst consulting small hatchery operators who still undertake this practice.
m92	Hon. R Mazza MLC	Do not support Option G.
m136	DA Hall & Co	Banning of hot blade treatment does not impact our operation as all beak trimming is done at day old with infrared treatment. We also do not undertake a second beak trim during rearing or lay. We do, however, disagree with the current definition of beak trimming whereby only 1/3 of the beak is to be treated. This definition came from the previous model code (12 years ago) and relates to hot blade treatment. In order to achieve an effective beak trim and remove the need for a second trim, the definition should reflect the amount of beak removed rather than treated. The total treated area for infrared should be 40%.
m66, m67, m81	Ingham's Turkey, Ingham's Meat Chicken, ATF	We are opposed to the removal of routine hot blade beak trimming of breeder turkeys as a management option. Option G, if adopted, must not ban routine hot blade beak trimming of breeder turkeys as a management option. We do not believe that the welfare benefits outweigh the costs both economic and in terms of animal welfare.

## General comments on RIS Options

m198	R Lauder	Options C-G are designed to manipulate the public into accepting provisions which suit the industry. They are vague in description, with no clarity of time frame proposed, and they fail to ‘minimise risks to the welfare of poultry due to deficiencies in the current codes of practice’ and are not in concordance with the OIE’s eleven general principles for the welfare of animals.
m29b, m115a,	RSPCA	[Summarised. <a href="#">See the full submission for details. DG to review</a> ]. RSPCA Australia considers Option C to largely represent current industry practice. We therefore question the estimated cost, most of which relates to SA9.15 which was thought to already be practiced by the vast majority of the industry. The evidence provided is not acceptable for such a significant cost estimation and greater transparency is required. The RIS acknowledges that a number of current industry practices “have not kept pace with animal welfare science and society’s expectations” and therefore present “significant risks to poultry wellbeing” (RIS, p.28). This underscores the importance of moving beyond Option C and including one of more of the additional options D to G as well.

## Appendix 2 – Responses to RIS Questions<sup>3</sup>

### RIS Responses- Question 1

Do you agree with the summary list of advantages and disadvantages of layer hen farming systems in Part 2.3.1?		
Code	Submitter	Submission
m105, m177, m86, m45, m92	FEC, Hon R Mazza MLC; P Bell; C Dolling; J Johnson	Yes.
m174	N Simpson	Yes. Cage farming system out shines all other systems.
m82	Baiada	Yes. List of advantages and disadvantages is considered largely complete.
m42	Cheralyn Simpson	Yes. In terms of animal welfare and egg production, it is clear caged production is far superior to alternative farming methods.
m159	Clairly Simpson	Yes. I have lived on a cage facility egg farm and can assure you the advantages listed in the RIS (page 34,35) exceed other egg farming methods.
m104	N Morgan	Yes. Production is greater in caged hens, suggesting these birds are comparatively less stressed. Mortality is also significantly lower in caged hens compared with any other system.

<sup>3</sup> A number of submissions provided additional information in response to a request for 'other comments or suggestions' at the end of this series of questions. Information provided there has either been incorporated into the S&G (where applicable) or into the themes identified in the first part of this report.

m156	C Keerqin	Yes. One thing to point out is that cage free systems are proven to have problems of feather picking and cannibalism
m17	J Cordina, Cordina Chickens	Yes. A disadvantage inadequately addressed in the RIS is the risk to the rest of the poultry industry from lower biosecurity (and higher probability of disease) in the free range egg laying sector. While the cost of eradicating emergency diseases is raised in the list, the cost [of eradication activities] to other sectors of the industry has not been considered, nor has the cost of disruptions to exports in all poultry sectors. The cost of higher incidence of endemic disease spread to other sectors of the poultry industry has not been addressed either [see submission for elaboration on this point].
m196	T Crowley	Yes. It would be worth considering colony cages as well. These are quite different to conventional cages and should be given a separate section.
m70	Turi foods	Yes. Most advantages/disadvantages are covered adequately in the list. However, Turi Foods challenges the concept that disease can spread faster in high density systems such as cages.
m98	B Williams	No. Bird to bird spread is limited in cages because there is less opportunity for bird to bird contact. The chicken is also not in direct contact with its faeces and this is an advantage in the control of salmonella and other diseases that spread via faecal – oral transmission.
m39a	AVPA	<u>[AVPA provided an extensive response with references, and the Drafting Group is recommended to examine the technical information provided.]</u> The introduction to their response is below as a summary. No. Suppositions and generalisations have been made about all types of production systems and the summary points have not been scientifically referenced to substantiate their accuracy. Furthermore, there are many types of caged systems (single tier, multi-tier, conventional, furnished/enriched and colony cages) as well as different types of free range (intensive and extensive) and barn systems (eg. barns with or without a scratch area, aviary systems and barns with verandahs). There may be inherent differences within the broader production systems reviewed with respect to all of the categories and points for consideration.
m161	J Sanderson	No. Several items are listed as only advantages however from being in the industry I have seen that this is not what necessarily happens. For instance it's easiest to inspect individual birds in cages however they don't get assessed individually. Hens in a larger system will be inspected more thoroughly when people walk through barns as these will be the birds that don't move away.
m107	S Loughnane	[Summarised] No. Little value is placed on 'ability to display innate behaviours'. It can't be listed as an advantage akin to saving some dollars on giving fewer vaccinations, for instance. This is an advantage that trumps most other concerns. There should have been research into emotional states - it is impossible to know the level of stress that each mode of housing the hens induces. Being bound in a cage that does not even allow the hens to extend their wings, for instance, is stressful and unnatural. These very likely emotionally traumatic factors should be understood to be a significant disadvantage to cage systems. I disagree that 'financial' disadvantages are valid. Consumers will be willing to buy more expensive eggs should it mean that animal welfare standards improve. Businesses should be expected to adjust to these changes, instead of obstructing them. Given this review is about animal

		welfare, it is inappropriate to list financial benefits or disadvantages as if they are the obvious and valid counterpart to animal welfare concerns. In fact, they seek to obscure the animal welfare conversation entirely and should be stricken from the review.
m11	AWLQ	[Summarised] No. The list of advantages and disadvantages are only comparative in relation to large scale production methods, and don't consider advantages of small flocks. Having more expensive eggs is not necessarily a disadvantage (given obesity, food waste etc). Other listed disadvantages of free range are only due to the failure to provide the necessary support in a large-scale cost-reduction approach for cheaper eggs, e.g. appropriate tree and ground cover and man-made covers and enclosures can prevent predation in free range situations. The lack of ethical principles, and predominance of economic arguments, in this advantages and disadvantages decision-making process is insufficient and makes it difficult to move to a more ethical conclusion.
m35	Ag and Food WA	No/Yes. Welfare problems presented by conventional cages are not presented clearly and there is no discussion of the relative costs and benefits of furnished cages vs. conventional cages. [Drafting group to examine technical information provided in the submission].
m6	P Fraser	No. There is no mention of caging animals for the production of eggs and meat as a "Specific deficiency in current MCOP for poultry" (table 14.1 [in the RIS]). It is assumed in the S&G and the RIS that caging animals will continue. This is a significant deficiency not addressed and I would concur with several agencies that if this was omitted because of undue interference by industry bodies, such an omission should be referred to ICAC.
m203	C Parker et al	[Summarised – see full submission for references etc. Drafting group to examine the technical information provided] No. The approach to risk takes a narrow perspective rather than considering animal welfare from a holistic point of view. Health is overemphasised, and animal suffering and opportunity for natural behaviours underestimated. An outcome oriented approach is preferable to assessing risk in different housing systems. This would recognize that the same housing systems (barn, cage, free range) can be operationalized in different ways that create different risks and benefits. It should be the responsibility of producers and researchers to devise ways of continually improving the management and features of every housing system to meet and exceed welfare outcomes, as well as environmental sustainability and public health and safety outcomes.
m56b	Name withheld by request	No. Average mortality rates should be shown for each system. There is a significant range of technologies grouped under cage - with and without manure removal for instance, this makes a difference. [Workplace Health and Safety] in aviary systems, bending down problems? Really tools can fix this and the vast majority of eggs are transported by conveyor! But I agree mostly. Aviary systems do not, by default, require an egg washing machine, the eggs are pretty darn clean! I understand these are generalities.
m180	Pure Foods Eggs	No. The [lack of the] provision of the freedom to express "innate behaviours" is not a disadvantage in cage systems. The requirement to express innate behaviours is to forage for food and prevent infestation of parasitic insects such as lice. In cage systems, birds are provided a constant supply of feed and water and the birds are protected from parasites. Free range and barn birds are just as prone to bone fractures as cage birds (in fact, in our experience, more so). Cage sheds actually have a lower stocking density per cubic metre (as opposed to floor area square metres) than a typical non-cage shed, so the argument that disease spreads faster is not valid.



m190	NSW Young Lawyers	No. The RIS does not recognise the following disadvantages associated with conventional cage systems: Increased risk of disease linked to sedentary lifestyle; increased risk of fractures during depopulation; increased risk of abrasion and consequent feather loss; the extent of restriction on movement. RIS also does not provide comparison between conventional/battery cages and enriched/furnished cages. Enriched or furnished cages have following advantages over conventional or battery cages: lower mortality; increased bone strength; reduced vent wounds; less susceptible to elongated and damaged claws; less susceptible to foot damage and compromised gait sores; reduced levels of stress, improved measures of immune function and stress resilience; greater ability to perform behavioural activities; lower aggression; potentially reduced levels of fear. Also concerned that RIS does not distinguish between different free range systems i.e. 1500 vs 10,000 bird per ha. <u>[Refer to submission for detail]</u>
m63	WAP	No. This is heavily biased towards conventional systems.
Do you think that any advantages and disadvantages are missing from this list? If so, please include them below.		
m92	Hon R Mazza MLC	No
m104	N Morgan	Need to include comments on flock uniformity. Need to include more details on the benefits of furnished cages. Free range birds eat the soil, thus contracting parasites. Free range issue with flock's uniformity and utilisation of the diets (ranging birds have different requirement to those that stay inside the shed).
m105	P Bell	A key point is the reduced oral-faecal cycle which greatly reduces the disease risk and improves food safety. Cages have the lowest carbon footprint and is best for the environment. Mortality is a key indicator of welfare – the fact is less birds die in cages. With reference to the listed disadvantage of more bone fractures it is pointed out that most research surveys identify more bone fractures in non-cage systems due to collision and perch damage.
m156	C Keerqin	Consumer affordability on the poultry products should be more discussed in correlation with the improvement on the rearing facility.
m98	B Williams	The disadvantages of free range systems have been under-estimated financially. The risk of exotic and endemic disease is significantly higher in free range operations. The flow on impacts to the rest of the industry are under-stated.
m42	Cheralyn Simpson	In a caged farm system, minimal human contact when collecting eggs (conveyer belts) ensures the protective layer of the egg (the “egg bloom”) remains intact. The egg bloom prevents bacteria from passing through the shell pores and reduces loss of moisture, allowing the egg to last longer.

m22, m33	EFA, SQA	In the cage egg advantages section, it is important to add that cage eggs also has the lowest mortality rate of the farming systems, and has the lowest carbon footprint. In the free range disadvantages section it would be pertinent to add that the free range system has the highest need for vaccines to inoculate from disease. Additionally, free range has the highest carbon footprint of the farming systems.
m64	ACMF	A disadvantage inadequately addressed in the RIS is the risk to the rest of the poultry industry from lower biosecurity (and higher probability of disease) in the free range egg laying sector. While the cost of eradicating emergency diseases is raised in the list, the cost (of eradication activities) to other sectors of the industry has not been considered, nor has the cost of disruptions to exports in all poultry sectors. The cost of higher incidence of endemic disease spread to other sectors of the poultry industry has not been addressed either.
m66, m67	Ingham's	The increased risk of disease to conventionally farmed birds from free range operations is not included in the RIS. There are substantial risks and cost implications to the other poultry operations from free range operations.
m45	FEC	The RIS fails to focus on important advantages of the caged production system. Caged birds have the lowest mortality rate. Bird welfare is the utmost priority of all farmers. The caged system creates the safest environment for birds, as it removes any dangers such as predators, smothering, cannibalism, and feather pecking.
m159	Clairly Simpson	Eggshell contamination from bird faeces in systems other than cage enables a greater possibility of Salmonella infections in humans. Chicken faeces collected easily from cage systems is an effective and sought-after manure for market gardeners.
m43	CEPAWA	[Summarised] The RIS report has failed to identify cage production advantages such as the production system having the lowest carbon footprint, and most importantly the lowest mortality rate.
m174	N Simpson	Yes. Cage advantages: safe guards against disease occurrence but should specify minimal risk of exposure to wild birds and infection from avian influenza; minimal egg shell contamination from faeces assuring less possibility of Salmonella infection in humans
m180	Pure Foods Eggs	Yes. Cages are better for worker (human) welfare. There is less dust and noise, less bending and climbing and the lower mortality rates means less stress for farm workers
m82	Baiada	Yes. There may be additional considerations with respect to environmental impacts of the different housing systems other than nutrient run-off into waterways. For example, nutrient deposition into soil, traffic, odour, noise and generation of waste
m81	ATF	Yes. Increased risk of disease to conventionally farmed birds from free range operations not include in RIS. There are substantial risks and cost implications to other poultry operations from free range operations
m70	Turi Foods	Yes. Poorer biosecurity in free range systems increases the risk to the resto of the poultry industry, as evidenced by recent disease outbreaks. The RIS does not adequately consider the cost to other sectors of the poultry industry nor the impact costs on exports of poultry products.
m39a	AVPA	[AVPA has provided an extensive response with references which should be considered by the Drafting Group. Below is a summary] Foot and claw health, keel bone fractures, the lower incidence of endoparasites is missing from the list of advantages for caged housing systems, level of disease between systems is oversimplified, usage of prescription antibiotics may be different and information on comparisons is unavailable,

		identification of mortalities and ease of removing them, impact of rearing environment, environmental impact especially odour and nutrient deposition.
m107	S Loughnane	Ability to express a range of healthy and positive emotions within hens would be a significant advantage of any compliant housing structure, and a damning disadvantage of those non-compliant. I would add to this social behaviours, ability to form positive relationships with species kin without undue environmental pressures causing competition and animosity unrealistic to wild relationships among animals. The ability to demonstrate social behaviours and form positive relationships with kin would be an added advantage of compliant housing structures.
m11	AWLQ	The lack of freedom to express innate behaviours is a major risk which appears down-played in this list and is a far more significant issue than it appears. Innate behaviours include walking, running, swimming for some, flying, and especially the capacity to make choices i.e. finding and experiencing delight with a range of foods, interaction within social groups, movement to or resting in different areas, enjoyment of sunlight and rain, etc. There are too many aspects of a life outside of a cage or crowded shed to list the deprivation that occurs. This lack of choices and natural world stimulation deprives hens of both physical stimulation and feelings of contentment, excitement, joy, and relaxation.
m161	J Sanderson	A much more thorough list is needed than can be provided here. I'm sure one of the welfare groups will be able to make a list and prioritise issues if asked.
m35	Ag and Food WA	The comparison of costs and benefits of conventional cages with alternative housing systems is incomplete. See [our submission].
m6	P Fraser	List 14.1 [in the RIS] fails to mention caging of animals as an unnecessary practice.
m203	C Parker et al	[Summarised. See full submission for supporting evidence etc. Drafting group to review] Risks do not consider relative weighting for dimensions of animal welfare i.e. health, suffering, and natural behaviours. Risks overlook other issues with intensive livestock production e.g. antimicrobial resistance, environmental impacts. Risks overlook varied production systems e.g. free range is broad with quite different risks and benefits. Community values given insufficient weighting. For e.g. the risk that practices perceived by consumers to be cruel will be increasingly sidelined by both consumers and by retailers.
m56b	Name withheld by request	Free range systems, but what about “pastured poultry”? perches are poorly designed, bird accommodation is basically non-existent - portable hot box laying spaces but no protection from the elements. One disadvantage is poorly described: free range limitations in which the ACCC and groups like Choice have decided to be moral arbiters in Australian poultry welfare and stipulate that birds must have regular access to a range and if they do not then one cannot say one's birds are free range. If a producer creates a great indoor space and a great outdoor space then “free”-range birds may well choose to stay inside, but given ACCC bias in the matter a producer may be obliged to force birds outside when they do not want to go just so they appear to have regular access to outdoors. This is a very real risk in which ACCC is creating a situation of poor choice and poor welfare for free range chickens, because a producer must ensure his/her birds are using the outdoor [range] provided even when 20% on any given day may well never want to, at a minimum. Very real risk exists when some regulators (ACCC) have no knowledge or care for welfare but decide they know best.

m63	WAP	[Summarised] Yes. It does not represent the full range of disadvantages of cages, community benefits and financial benefits of non-cage systems for laying hens. Also risks 127 million fast-growth meat chickens experiencing excessive stocking density. <u>[Drafting group to examine technical information provided within the submission]</u> .
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## RIS Responses- Question 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?		
Code	Submitter	Submission
m42	Cheralyn Simpson	No. A disadvantage discussed in the caged system is “lack of freedom in cages for layer hens to express innate behaviours”. These “natural” behaviours are subject to what they encounter in their environment. The original chicken lived wild in the jungle. They perched in trees at night to protect themselves against predators. In today’s farming practices, predators are not an issue for hens in caged facilities, therefore this behaviour could be considered obsolete. Original chickens scratched and foraged to find food, this is conveniently provided for them in current facilities.
m174	N Simpson	No. Disregarding cage systems are a step back in time. Caged systems allow for a temperature-controlled environment. References to expression of innate behaviours are criticisms directed at cage systems – modern chicken breeds not interested in these behaviours. Other egg systems have more disadvantages than those listed, animal welfare being amongst them with pecking, crowding, exposure to environment and predators.
m35	Ag and Food WA	No. The Department disagrees with the statement in the RIS “No (such) studies have been done on any significant scale in poultry”. Based on our review of the published articles in the FBWSR, there is an extensive source of scientific information on the animal welfare risks associated with conventional cages and high stocking rates of chickens in barns. It is not clear how this body of scientific information was considered in the supporting papers to the national standards and guidelines, which in our view underestimate the risks to poultry health and welfare. In addition, the advantages and disadvantages of conventional cages were mainly compared to those of free range housing systems, without taking into account the fact that the biosecurity benefits of housing (which is not the same as using conventional cages) could be obtained by using furnished cages, which provide the same biosecurity benefits and also acceptable welfare outcomes.
m56b	Name withheld by request	No. I think a move towards enriched cages or what is termed furnished in this document is wise, and hybrid and aviary systems but not a mandated move - a guide not a rule. The risks are low and the benefits of maintaining a baseload of economic eggs benefits are higher. It is worthy of comment but not of mandated change.
m159	Clairly Simpson	No. A consistent national standard of animal welfare is a step forward and should provide an effective basis for prosecution, should standards not be maintained.

m70	Turi Foods	No/Yes. We can see the benefit in clarifying some of the guidelines with respect to animal welfare. Minimum light intensity and dark periods using breed guidelines for the species should be the guide. We support stocking density guidelines that take into account variability in facility capabilities. Guidelines for bedding materials is important to help minimise contamination from toxic materials, however these guidelines need to be realistic. To “guarantee” 100% absence of toxic material is not practical and cost prohibitive. Guidelines on litter conditions for birds raised on the floor are important provided they take into account all animal welfare conditions. Litter can be dry and caked in parts of the shed but still provide satisfactory conditions for the birds, whereas if the litter was to be worked it would release high levels of ammonia and require feeders/drinkers to be removed from the birds for a period of time. Birds awaiting slaughter at the processing plant can pose a significant welfare risk if satisfactory holding conditions are not provided. This does not need to be addressed in the standards.
m98	B Williams	No/Yes. Yes some standards are inadequate or unclear however the wording in the proposed standard needs changing. Minimum light intensity needs to refer to shed average as anything else requires a major unwarranted lift in overall light intensity. Periods of lower intensity may be appropriate to manage pecking and flightiness in flocks therefore some discretion is warranted. The description of dark hours required is confusing and needs rewording. The requirement to ensure the litter is free of contaminants is impractical and absolutes for dry friable litter are unnecessary for optimal welfare.
m68	ACGC	No/Yes. ACGC supports the introduction of minimum standards for light intensity to 5-lux average during light periods. Appropriate minimum hours of darkness are also supported, with exemptions for circumstances beyond the grower’s control. ACGC support the establishment of minimum stocking densities and support a base case option of 38kg/m <sup>2</sup> . This minimum standard needs added terminology to allow for a breach in an event beyond the grower’s control. It is not possible to quantitatively say that litter is 100% free of contaminants therefore we oppose the wording of this standard and suggest a change to “... a person in charge must take reasonable measures to ensure that ...” It is not possible to ensure that 100% of litter is dry and friable at all times, therefore we oppose the wording of this standard and suggest a change to “...where litter is used a person in charge must manage litter to avoid and minimize excessive caking, dustiness or wetness that impacts on the welfare of poultry.” ACGC maintain that dry and friable litter is not an indicator of bird welfare, and therefore a standard for 100% dry and friable conditions is unnecessary. Multiple shed entries to manually work litter to achieve such an unrealistic standard will have adverse bird welfare effects therefore there must be a practical balance of this measurement.
m64	ACMF	No/Yes. Some changes are justified on welfare grounds. [See full submission for comment on welfare risks. <a href="#">Drafting group to review evidence in submission</a> ].
m82	Baiada	Yes: lack of quantitative lighting standards – better clarification supported; need for restrictions on routine beak trimming – hot blade beak trimming should be allowed to be carried out by trained and experienced personnel; risky litter management.  No: inadequate space allowances for poultry – already clear standards legislated in most states. [See full submission for detail].

m81	ATF	No/Yes. Agree that some changes are justified on welfare grounds and reflect changes in community attitudes and changes in technology. Generally support draft S&Gs but a number of changes are needed to ensure S&Gs are fit for purposes. Do not support removal of hot blade trimming for breeder turkeys as it remains important tool in management of breeder flocks for good welfare outcomes. [See full submission for detail].
m66, m67	Ingham's	No/Yes. We agree that some changes are justified on welfare grounds and reflect changes in community attitudes and changes in technology. While we generally support the draft S&Gs, we do believe that a number of changes are needed to ensure that the S&Gs are fit for purpose. These specific changes are detailed [in our] submission. We do not support the removal of routine hot blade trimming for breeder turkeys (as proposed as Option G) because we believe that it remains an important tool in the management of breeder flocks for good animal welfare outcomes. See "Other Comments or Suggestions" for details.
m104, m161, m177, m196, m203	N Morgan; J Sanderson; J Johnson; C Parker et al	[These responders ticked yes with no further comment]
m180	Pure Foods Eggs	Yes. Ensuring standards are legally enforceable will provide for improved welfare outcomes
m43	CEPAWA	Recognise that consumers are inherently more concerned with regard to where their food comes from and how their food is produced. Option C of the RIS brings into effect mandating laws surrounding animal welfare. WA producers agree with the importance of being responsible and all systems provide their own challenges and producers are continually looking at science and new methods to better improve hen welfare.
m92	Hon R Mazza MLC	Yes. Support Option C allowing for the adoption of proposed national Standards currently drafted which would replace the existing MCOP
m105	P Bell	Yes. There are improvements that can be made to all systems of egg farming. The issue mainly relates to education and in particular for new entrants to egg farming. There is mention of the numbers of birds involved and it should be mentioned that the focus has been on cage egg production with much less scrutiny on barn and free range. The facts are that more birds get sick and more birds die in non-cage systems due to the inherent weaknesses of faecal exposure, disease, social pressures, injurious pecking, smothers, and fox predation.
m107	S Loughnane	Yes. Absolutely. There are not merely 'risks' to hen welfare, but countless and obvious infractions on welfare occurring right now across the industry. These violations of welfare need to be acted on right now, and better standards and/or guidelines need to be enacted swiftly, with the strictest and most humane possible solutions being pushed for.

m11	AWLQ	Yes. There is a strong need for better standards. However the proposed S&G are insufficient to overcome these risks and ensure the welfare of poultry. Based on the ethical principles of respect, fairness and integrity, a phasing out of cage production, a reduction in numbers in barn and free range systems, and a move to a more decentralized caring approach in the whole production system is needed.
m86	C Dolling	Yes. In a conventional cage size is 550cm <sup>2</sup> per hen, this size prevents hens from performing basic natural behaviours. Studies have shown that hens require more space to flap wings, stretch wings, preen, and ground scratch, stand, turn around and lie down. Observations taken of the behaviour of birds in commercial conventional cages confirms that many behavioural activities are constrained <a href="#">[see technical information/supporting evidence provided in the submission]</a> .
m17	J Cordina, Cordina Chickens	Yes. We support the establishment of definitive minimum standards for stocking density and agree with the base case option standards in this respect. Litter quality is an important welfare factor, which needs to be properly managed. It is appropriate to have a standard to address litter management, however the standard needs to also acknowledge and reflect the practicalities and difficulties involved in litter management. It is critical to understand that litter works can cause adverse welfare outcomes such as scratches, smothers and great stress in birds. See ‘additional comments and suggestions’.
m39a	AVPA	<a href="#">[AVPA has provided an extensive response with references which should be considered by the Drafting Group]</a> . The introduction to their response is below as a summary]. Yes. Many of the risks identified do substantiate the need for comprehensive standards and guidelines to protect poultry welfare in Australia. The field of animal welfare science is evolving, as are farming practices, necessitating regular updating of the welfare requirements. The current legislation and Model Codes are also deficient in some areas, which could lead to negative impacts on poultry welfare.
m22, m33	EFA, SQA	Yes. Agree that new S&G will clarify the welfare outcomes that are required of farmers.
m45	FEC	Yes. We recognize that the previous MCOP was insufficient as it works only at a voluntary basis, improvements can be made to each of the production systems, and creating clear guidelines of welfare will continue to improve poultry standards.
m63	WAP	[Summarised] The risks, and community views on the risks, are incomplete, e.g. genetic/breed, handling, lack of competence, compliance, reporting <a href="#">[see full submission]</a> . The draft Standards as currently written do not convey adequate ‘better standards’ and should be rewritten.  <a href="#">[Drafting group to examine technical information provided within the submission]</a> .



## RIS Responses- Question 3

Which of the above-mentioned areas of risk to poultry welfare do you think are of the greatest concern?		
Code	Submitter	Submission
m17	J Cordina, Cordina Chickens	All of the above are important
m92	Hon R Mazza MLC	<p>[Summarised. See full submission for detail] None of the risks associated with hen welfare can be considered in isolation, to do so would be irresponsible. The welfare within conventional caged systems can be the same or better than in barn or free range even though the animal might not have the opportunity to scratch, perch or dust bathe.</p> <ul style="list-style-type: none"> <li>• Stocking density: more research needed into effects of space allowance in flocks of more than 30 birds.</li> <li>• Lack of perches, nests and litter for layer hens: to force industry to phase out conventional cage production systems when there is “little physiological evidence to indicate that bird welfare is impaired” is unjustified.</li> <li>• Lack of quantitative lighting standards: The issue of light intensity may need to be addressed as a guideline rather than a standard</li> <li>• Need for restrictions on routine beak trimming: There appears to be compelling evidence that beak trimming results in long term benefits for the individual animal and flock as a whole. Agree that it should be carried out by a trained operator</li> <li>• Risky litter management: Agree that litter management is important, that material used is suitable for the specific species and of good quality, and that toxic agents should be minimal</li> <li>• Need to restrict routine use of induces moulting: Agree that it should not be routine but allowed under certain conditions due to benefits</li> <li>• Care of meat chickens and turkeys awaiting slaughter: Agree they should be protected</li> <li>• Access to water for ducks: Direction on this matter should be sought from the AVA.</li> </ul> <p>The statement “Market signals will generally cause welfare standards to fall below community expectations, in the absence of regulation” should not be made unless properly researched.</p>
m156	C Keerqin	#2. I agree with any move towards the improvement of the animal welfare and the efficiency of the production yet the sustainability will be the biggest challenge in Australian market as well as the global. I would like to stress more on the accuracy and comprehensiveness of the conclusion.

m104	N Morgan	Pecking order and stress; caged birds are less stressed as highlighted by increased production and reduced mortality.
m105	P Bell	Disease, mortalities, injurious pecking, smothers, and fox predation.
m177	J Johnson	Biosecurity, however humans are the risk. Good, intuitive husbandry practices will reduce biosecurity risk. For example: a manager that doesn't actively clean up a feed spill will attract wild birds and their unwanted viral and bacterial species.
m196	T Crowley	Biosecurity – transmission of diseases (such as avian influenza) in free range poultry farming.
m45	FEC	As mentioned each production system has advantages and disadvantages, the areas of greatest concern are bio-security, predators, smothering (in free range and barn) disease prevention.
m42	Cheralyn Simpson	Biosecurity would be my greatest concern, in particular the infection and spread of avian influenza. Caged systems provide the greatest defence against the deadly disease. Cannibalism of chickens and their natural pecking order is a great concern to their welfare. When living on our caged commercial farm, it was easy to identify a chicken that was subject to severe pecking. This chicken would be moved into another cage to protect against further pecking. Imagine being a hen in a free range facility, sharing the space with 50,000 other hens. I'd hate to be that hen at the bottom of the pecking order.
m22, m33	EFA, SQA	The activist sector is most likely to believe that an animals' freedom to perform "natural behaviour" is the most important welfare concern for poultry however, EFA believes that the most important welfare concern to be mortality. The only scientific, measurable method of ascertaining the welfare of a hen is through assessment of biological functioning. Disease, predation and severe weather can greatly impact on the welfare of a chicken and the removal of cages could remove a production system that ensures that all of these welfare outcomes are no longer appropriately monitored. EFA understands that welfare is not solely concerned with biological function and giving consumers the option to purchase free range eggs allows them to make a decision about which welfare outcome is most important to them. EFA considers biological welfare outcomes to be of greatest concern however, due to the fact that it is measurable and scientifically based. More study should be undertaken into a hen's affective state before it can be considered as the most important welfare outcome.
m68	ACGC	Suitable stocking densities and good litter conditions have the most effect on bird welfare.
m39a	AVPA	<p>[See AVPA submission for extended response. DG to review]</p> <p>There are two areas for consideration – the responsibilities of personnel, which is considered fundamental to the standards, and the specific standards to ensure poultry welfare is protected.</p> <ul style="list-style-type: none"> <li>Lack of clear responsibilities for personnel in charge. Defining the responsibilities for personnel in charge of poultry is a key consideration but without clear standards, there is limited scope for clear responsibility. This area also has the potential to affect the greatest number of poultry for the most amount of time and could have the most severe consequences with respect to welfare.</li> </ul>

		<ul style="list-style-type: none"> <li>It is difficult to ascertain which of the risk areas relating the specific standards are of highest importance because overall risk assessment will relate to the number of birds affected and the duration of the impact.</li> </ul> <p>The risk assessment should determine which of the risk areas are considered of highest importance. See comments relating to the assessment of risk under Question 17.</p>
m6	P Fraser	Not mentioned in table 14.1 [in the RIS] or anywhere else is the caging of animals [as a risk].
m86	C Dolling	Conventional cages, stocking density for geese, partridges and pheasants, allocation for responsibility of welfare of poultry, ensuring that poultry that are not fit for slaughter are killed humanely.
m107	S Loughnane	Space. Hens need space to move, to display innate behaviours, and to have some experience of their lives, bodies and minds. We are effectively keeping these animals in straightjackets, which we can no longer pretend is justified given their ‘inferior’ nature. No. These animals deserve space. They are giving their eggs, and oftentimes lives, in order to feed us. We should extend some modicum of respect to their kind.
m11	AWLQ	All of these risks are of concern, but lack of freedom to express innate behaviours is the most pressing concern. The ethical inconsistency in how we treat birds for meat and eggs compared with cats and dogs (illegal to confine them to a cage where they cannot walk etc) needs to be addressed. There has been well-established scientific evidence that birds experience stress and many emotions (both positive and negative) as well as physical trauma in the process from birth to death in all egg production systems, but particularly cage systems, and will go to great lengths to meet their innate needs and desires. The evidence that cage egg production was cruel was on the table at the last National Hen Housing Review approx. 17 years ago. It is inconceivable that the phasing out of caged hens along with far more significant reductions than currently proposed in the stocking densities of barn birds does not occur in this current review, in 10 years not 20, as the industry have had nearly 20 years to prepare for this inevitable progression in ethical behaviour.
m161	J Sanderson	Lack of ability to express natural behaviours, cannibalism through lack of stimulation and inappropriate care from owners.
m196	T Crowley	Beak trimming, care of meat chickens and turkeys awaiting slaughtering, lack of clear responsibilities for personnel in charge.
m35	Ag and Food WA	In our view the greatest risks are those that affect all birds for most of their life, i.e. the inability to express innate behaviours, as occurs with laying hens in conventional cages [see submission]. Impact of animal husbandry or handling procedures on individual animals.
m68	ACGC	Chain of responsibility for animal welfare: ACGC acknowledges that the chain of responsibility within the contract meat chicken industry may seem unclear, given that the farmer never takes official ownership of the birds. For this reason it is essential that there is clear definition of who is responsible for the welfare of the birds. To state that under the current animal welfare framework ‘nobody is held accountable within organizations for adverse animal welfare outcomes’ is not correct. For the time that the birds are under the care of the contract farmer, the contract farmer is wholly and totally responsible for the welfare of the birds. At the point in time when responsibility is

		handed over to the processor pick-up crew, ACGC would like the animal welfare standards to acknowledge that the grower is no longer responsible for the welfare of the birds even though the birds are still physically on the farm until the loaded trucks depart. This is a grey area not addressed in the Land Transport of Livestock Act, and ACGC believe it should be addressed in the animal welfare standards.
m104	N Morgan	Nutrition and flock uniformity. Cages birds expend the same energy so can all be fed the same diet, but in barn and free range the birds move different amounts and have varied access to feeders so have different nutritional requirements, especially in free range.
m64	ACMF	Getting the wording re litter management right is very important, as is providing protection from adverse conditions for birds awaiting slaughter.
m70	Turi foods	Litter management is important provided definite requirements that take into account all conditions for the best animal welfare outcomes are considered. An example is disturbing the birds [by] rotary hoeing during periods of peak density as opposed to waiting a day or two until after a thin out when there is more room. Protection from adverse weather whilst awaiting slaughter is another area of great concern with regards to animal welfare.
m66, m67	Ingham's	Lighting and management of litter are of greatest impact. We also support the establishment of maximum stocking densities but believe that the currently proposed densities for turkey broilers is not in line with international standards and is not supported by scientific evidence while strongly limiting the industry in its ability to optimally manage turkey flocks and make best use of the available infrastructure. See [submission] "Other Comments or Suggestions" for details.
m156	C Keerqin	There is a large concern of the domestic poultry production when it comes to the welfare standard. However, any drastic change should be avoided in order to maintain a sustainable production capacity for the domestic market.
m105	P Bell	The points listed above are well covered in the Victorian Welfare Review of scientific literature [FBWSR]. It is noted that in that report the conclusions don't always match the data presented, particularly in mortalities being a key indicator of welfare.
m39a	AVPA	<p>1. Poor handling of poultry is considered a risk affecting all species for the duration of their lives. Standards related to handling are deficient in some sections, specifically for emus, meat chickens and laying chickens. Under the other species sections, specific handling standards are included. Guidance should also be provided in terms of specific species handling to optimise welfare outcomes.</p> <p>2. There may be fewer people with the knowledge and expertise in relation to the minor species, such as quail, partridges, guinea fowl, emus and ostriches, to be able to substantiate that the proposed new standards adequately ensure the welfare of these species.</p> <p>3. Good stockmanship skills and adequate training is considered fundamental to poultry welfare. These areas are addressed in the first section of the draft standards but it may be difficult to guarantee in all circumstances and for all species of poultry that the level of training and stockmanship is optimal.</p>
m107	S Loughnane	The hens should have access to sunlight, and to the air. They should have access to space, and as much as possible. 'Biosecurity' is only an issue because they currently live in such rarefied, confined, controlled spaces that as groups, they have little to no immunity to what's outside those four walls. If big agriculture invested more in research that attempts to link biosecurity and health to animal welfare instead

		of profitability, then we would have more substantive answers on how to best protect hens. But as it is, the cheapest option is considered best. Where it comes to nature, however, this is a shortcut. Hens are not hardy, and that is our fault. Let's develop better vaccines, let's make sure companies are buying and administering them. Let's make hen health a matter of decency, not just of best 'yields'.
m6	P Fraser	See my submission on the basic underlying assumptions in the Draft (m6b). The argument that quantitative evidence that animals experience stress and pain is not available and that therefore only qualitative judgements can be made to determine a position, is philosophically and practically nonsensical. Your request, therefore, for scientific evidence is invalid, as your own argument implies that this is not possible to so provide, if by "Scientific" you mean "quantitative measures".
m56b	Name withheld by request	Housing and housing with relation to free range and pastured poultry operations. The poor designs used by somewhat ideological operators are extremely detrimental with regard to the welfare of the birds. Some of these operators are RSPCA approved and yet have extensive outdoor feeding, no ventilation, no shelter to speak of, no ability to secure the flock in case of disease outbreak and yet have the support of the RSPCA. Simply because they are not cage systems does not automatically mean they are better than cage systems.
m159	Clairly Simpson	Higher hen mortality rates from farming systems other than cages. Infectious disease concerns with egg production systems other than cage systems, not only relative to hens but also humans (refer avian influenza and salmonella enteritis).
m43	CEPAWA	The areas of greatest concern are related to factors that impede hen welfare, noticeably more so in barn and free range such as smothering, disease, feather pecking, cannibalism and predators (foxes).
m63	WAP	The following systemic risks are of greatest concern: restriction of behaviour 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 [see full submission for detail. <u>DG to review technical information provided in the submission</u> ].
m61	SBA	The area of risk to poultry welfare of the greatest concern for SBA is routine second (hot blade) beak trimming. SBA are of the opinion that routine second beak trims are not required for all laying or breeding flocks, and this treatment should only be permitted under the advisement of an experienced poultry veterinarian based on previous flock history and current farm nutrition and flock management. Poultry veterinarians are best placed to take into account the flock health status, management procedures, nutrition and other factors that influence the need for this treatment, and to assist producers to alter factors within their control to reduce the requirement for this second hot blade beak treatment. SBA strongly supports the banning of hot blade beak treatment at day of age in hatcheries. Infra-red beak treatment technology is readily available in Australia and results in an even, consistent beak treatment with less pain and fewer negative welfare outcomes than the hot blade alternative when used at day of age.
m174	N Simpson	High mortality rates and infectious disease concerns from farming systems other than cages. Refer to [my] submission for information on avian influenza.

m180	Pure Food Eggs	The industry has moved into non-cage, particularly free range, systems faster than issues like disease, smothers, feather pecking and cannibalism can be researched and effective solutions found.
m82	Baiada	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. Concerns relating to turkey standards: toenail trimming of hens not permissible under proposed standards and guidelines - ability to trim toenails of hens needs to be retained in cases where this practice may be justified on welfare grounds; handling standards for turkeys needs to be revised to make it clearer and ensure birds can be lifted appropriately for purposes of catching and artificial insemination. <a href="#">[Refer to submission for detail]</a> .
m81	ATF	Support establishment of maximum stocking densities but believe current proposed densities for turkey broilers is not in line with international standards and not supported by scientific evidence while strongly limiting the industry in its ability to optimally manage turkey flocks and make best use of the available infrastructure.
Are there any other areas of concern to poultry welfare? Please provide reasons for your answers, together with supporting scientific evidence.		
m56b	Name withheld by request	Reducing access and easy availability of the tools or making values driven statements and rules regarding tools ... and trying to reduce the use of hot blade trimming just for the sake of it when such solutions can provide, at times, the only viable alternative to birds eating each other alive is a poor idea.
m159	Clairly Simpson	Free range farming increases the risk to animal welfare from exposure to wild birds and infectious diseases such as avian influenza. This virus can cause severe and fatal infections in humans. To prevent an outbreak of bird flu, keep wild birds and domesticated birds apart and ensure domesticated birds have a safe supply of drinking water - procedure already covered by cage egg production.
m35	Ag and Food WA	<p>The Department does not support the maintenance of stocking densities for laying chickens in cages (Appendix B1 in the S&amp;G Poultry) or for meat chickens in sheds (Appendix B2 in the S&amp;G - Poultry) as proposed in Option C. The stocking densities for laying chickens are the same as those recommended in the Model Code of Practice for the Welfare of Animals - Domestic Poultry, 2002 and the maximum stocking density for broiler chickens (40kg/m<sup>2</sup>) is the same as recommended in the Model Code of Practice for the Welfare of Domestic Fowl published by the Bureau of Animal Health in 1983.</p> <p>It is inconceivable that recommendations made more than 30 years ago could be considered to reflect up to date scientific understanding of animal welfare, given the advances set out in more than 1,000 papers on the welfare of layer hens and broiler chickens in the FBWSR published by the State of Victoria in 2017.</p>
m22	EFA	Satisfied with the areas of animal welfare identified in this RIS.

## RIS Responses - Question 4

In your experience, to what extent do the existing Model Codes of Practice (MCOPs) and related regulations create uncertainty for Industry		
Code	Submitter	Comment
m177	J Johnson	I began in the poultry industry in 2004 and have always used the MCOPs as my guide and reference. I do not believe that MCOPs create uncertainty.
m105	P Bell	Generally, they don't create uncertainty – it is more a case of farmers reminding themselves what is in the MCOPs.
m17	J Cordina, Cordina Chickens	The existing MCOP is clear and does not create uncertainty, however it fails to provide guidance on certain welfare indicators. We as meat chicken company essentially adopts the 'must' and the 'should' in the MCOP in our daily practices as regulatory and minimum standards anyway.
m68	ACGC	The existing MCOPs have been adopted and are used diligently by contract farmers. Contract farmers risk penalties from their processor, up to and including loss of contract if MCOPs (written into Broiler manuals of individual processors) are not followed. Therefore MCOPs are quasi-regulatory in the opinion of contract growers represented by ACGC, and currently provide certainty.
m107	S Loughnane	I am unsure, as I am not a practitioner within the industry but a concerned citizen. Nevertheless, I believe strong guidelines that are non-negotiable and whose infraction yields penalties would mean there is less confusion. There would be less confusion because what a hen deserves – basic decency – would no longer be up for discussion. Let's raise the standard of animal welfare, and keep it cemented in law.
m104	N Morgan	It is unclear how to manage litter properly. Also varied views in beak trimming. There is a lack of understanding about enrichment and its potential benefits. Lack of understanding of what the consumer actually wants.
m11	AWLQ	The examples provided in the RIS clearly show a confusion in the combination of 'must' and 'should' in the same paragraph which would be difficult to remember. This mixture may have been to protect industry from prosecution for those aspects of each guideline with which most producers did not comply, if the state governments decided to create the 'must's as legislated Standards carrying a penalty.

m161	J Sanderson	'Should's are not enforceable so worthless for either regulation or understanding. Even 'must's are not enforceable under Western Australian legislation unless the thing in question is covered by the Animal Welfare Act 2002 (AW Act). This creates uncertainty from area to area so clearly identifiable statements and ways to ensure these are carried out need to be created in order for effective regulation Australia wide.
m35	Ag and Food WA	The adoption and use of MCOPs is dependent on jurisdiction. Western Australia adopted a Code of Practice for Poultry in Western Australia - Poultry which is based on the MCOP for domestic poultry, 2002. This code is listed in Schedule 1 of the Animal Welfare (General) Regulations 2003. It is not legally enforceable but may be used as a defence against a charge of cruelty under s. 19 of the Animal Welfare Act 2002. The different provisions in different jurisdictions create uncertainty for industry, particularly for poultry companies that operate in several states or territories.
m39a	AVPA	In general, the main stream Australian poultry industry accepts that the current Model Codes are the minimum requirements, with some exceptions, and adheres to the standards and guidelines. Most states have endorsed the Model Codes either directly or indirectly by referring to them in their legislation, except in the case of Victoria, which has its own Code. The main issue is that the Model Codes have also not been updated for some time to reflect current industry practices, recent scientific advancements in the field of poultry welfare science or changing community expectations. This could create uncertainty as to the relevance of the existing Codes.
m196	T Crowley	Without clear guidelines it is hard to determine what is required and what is suggested, making it very confusing for industry and consumers.
m22, m33	EFA, SQA	The confusing variant in the use of the words 'should' and 'must' creates confusion for farmers when following the current standards and guidelines. National standards and guidelines would benefit farmers and hens. Often farmers from varying states experience confusion regarding where to locate their state's standards and guidelines and a national document would create a streamlined, less confusing process.
m98	B Williams	Generally ok. Some items could be worded better. There should not be differences between states – it just adds complexity and cost to the community.
m156	C Keerqin	We need more monitoring first line of the production and operations to make sure the guidelines are strictly followed.
m203	C Parker et al	<p>[Refer to submission for supporting evidence]. The main uncertainty created for industry is in the definition of "free range" adopted, which is open to broad interpretation and does not match the definition recently adopted in the new national information standard for free range eggs. Our research on free range labelling suggests that there is still much uncertainty among both industry and consumers regarding the meaning of free range. It is important that the definition of "free range" in the poultry standards should match and amplify the definition in the national information standard in order to provide clarity.</p> <p>We are particularly concerned that the "free range" standards set out here could essentially outlaw small scale free range, where chickens are out all the time (often protected by Maremma dogs), as the newly proposed standard requires the birds to be confined at night. We</p>



		recommend that the standard should recognize the different types of free range that exist or at least recognize the possibility to meet welfare outcomes in different ways.
m64	ACMF	The existing MCOP is clear and doesn't create uncertainty although it fails to provide guidance with respect to lighting (duration and intensity). The chicken industry essentially adopts the 'musts' (and in fact the 'should' in almost all situations) in the MCOP as if they are regulatory standards anyway. The current arrangements (whereby each State legislates poultry welfare in a different way) is difficult to explain to customers and the public who are concerned that there may be inadequate oversight of poultry welfare. This is not desirable. There will remain some issues in this respect, even after implementation of the S&Gs, because each state will use different legislation to put these standards into effect. Nevertheless, if the principle of consistent outcomes in legislation is adopted, then our ability to describe the regulatory system in place across Australia will be improved.
m66, m67, m81	Ingham's, ATF	To have a legally enforceable minimum standard would make it easier for consumers to have confidence and trust in the poultry industry in terms of its animal welfare outcomes. Such trust and confidence will ensure that the industry is allowed to operate with minimum interference.
m45	FEC	The MCOPs did not create uncertainty in the industry. The mixture of 'must' and 'should' statements in the MCOPs made it more difficult to implement and prosecute, though in experience farmers' main priority is hen welfare, with farmers following the voluntary guidelines and when in place you achieve a low mortality and high production rate.
m56b	Name withheld by request	The existing standards are not inherently unclear, there is nothing wrong with 'should' statements. Mandating too many items disallows innovation and does not accommodate circumstances well enough. There is certainly not much justification for change described in section 2.4.1.
m159	Clairly Simpson	I am aware of farmers in Western Australia who are still paying for their upgrade of cage systems undertaken in that past 10 – 15 years. If option D is accepted by the RIS it will cause substantial and possibly devastating hardship for these farmers. Furnished Cages systems as an option to regular Cage systems is very likely to receive the same discrimination to product as being suggested Section A3.3.1 Appendix 3 to this RIS. It can still be classed as a cage system.
m43	CEPAWA	<p>We appreciate that the existing MCOP has become an outdated model. Consumer expectations are changing in a way that those purchasing eggs would like to have certainty that animal welfare is consistent and upheld nationally by farmers. We understand that previous language used in the MCOP such as 'must' requirements and 'should' statements provided difficulties in the implementation and enforcement of guidelines. Under the old model accountability of farmers or those responsible for animal welfare was difficult to prosecute.</p> <p>We support Option C of the RIS, and moving from voluntary guidelines to a mandatory and outcomes-based approach will ensure community expectations that animal welfare outcomes are met in the practice of poultry farming. The regulations of animal welfare in the MCOP are still a sufficient model for proper hen welfare outcomes, providing a strong platform to improve standards and guidelines.</p>

m61	SBA	Consistent national animal welfare legislation is essential to provide certainty for business. With operations in four states, and technical specialists providing management, husbandry and veterinary advice in all states and territories, consistency of welfare standards across all jurisdictions is critical.
m92	Hon R Mazza MLC	From the examples in RIS provided, confusion [exists] between what ‘must’ versus what ‘should’ be done to comply with current State and National MCOPs. This creates uncertainty for industry and government when interpreting documents.
m180	Pure Food Eggs	Existing MCOP is not legally enforceable so there is no clarity on what must be done to ensure optimum welfare outcomes. While state and territory governments are responsible for implementation of standards, there will always be uncertainty. A classic example of this is the introduction of eggs stamping where every state adopted a different approach.
m82	Baiada	MCOP is largely adopted in its current form as recognised minimum 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. Uncertainty is currently not considered to vary between states and territories to extent where any issues are created. States and territories may be increasingly likely to regulate different areas within their own jurisdictions independent of the content of the guidance documents
m174	N Simpson	Furnished cage systems as an option to regular cage systems may receive the same discrimination to product as being suggested in Section A3.3.1 Appendix 3 to this RIS
m70	Turi Foods	The existing MCOPs are quite clear and understandable. Our company does not see any areas where MCOPs can create uncertainty.

### Does such uncertainty vary between different states and territories?

m161	J Sanderson	Yes, all states have differing powers to make regulations under their various POCTA [Prevention of Cruelty to Animals] and AW [Animal Welfare] Acts.
m104	N Morgan	No, an issue for the whole country
m105	P Bell	There is a difference in the adoption of the MCOPs in legislation between states. Farmers would be aware of their own state requirements.
m33	SQA	Each state or territory has its own set of laws governing poultry welfare which can vary. This is demonstrable when looking at the sections of state legislation that outline the penalties for noncompliance.

m39a	AVPA	Some states have more comprehensive poultry Codes of Practice rather than reference the Model Codes (eg. Victoria), which could create some confusion. However, generally, there is considered to be minimal uncertainty, as there is considered to be reasonable consistency between states and territories. Uncertainty could also be related to free range stocking densities, where the requirements to stock 1,500 laying hens per hectare in the existing MCOP were not universally adhered to and enforced. In Queensland, the requirement to stock 1,500 hens per hectare was originally regulated. In the other states at the same time, stocking densities of 10,000 hens per hectare or more were consistently applied. Inconsistencies and uncertainty as to whether the MCOP should be applied in all states and territories in the case of free range stocking densities for laying hens has created problems for consumers and for the industry.
m156	C Keerqin	The main concern about the division of standards may be when training or monitoring cannot be sufficiently employed.
m177	J Johnson	Not to my knowledge
m196	T Crowley	Yes
m68	ACGC	The majority of processors operate nationally and adopt national standards, therefore there is little practical difference between states and territories. State legislation may certainly vary depending on what of the MCOPs has been adopted, but contract farmers operate under strict, national processor requirements. Uncertainty comes from individual state jurisdictions interpreting MCOPs differently when assessing planning requirements.
m64	ACMF	There is uncertainty in terms of what is picked up in regulations in different states and territories and what is not. This does not so much have an impact on the practices implemented by industry across Australia, but impacts more on our ability to explain to customers and the public the regulatory arrangements that are in place to ensure government oversight of poultry welfare in Australia (and specifically what is and what is not mandatory in different jurisdictions).
m66, m67	Ingham's	Differences between states will result in a non-level playing field for members operating in different states. For Ingham's as a national player, differences make it more onerous to meet the various requirements and will also influence Ingham's investment and growth strategies in different states.
m45	FEC	No, each farmer should have been aware of their own welfare regulations.
m56b	Name withheld by request	What this question assumes that uncertainty is bad! We live in a complex world, and uncertainty actually means flexibility which is a necessity for efficiency and for business success. If Australian producers must be locked into draconian welfare rules then they must also be protected from imports from nations without those imposts and protected from counteractive and anticompetitive structures applied by the groups like the ACCC whose interpretation of free range advertising rules is extremely counterproductive in terms of poultry welfare. The ACCC essentially

		states a producer must force birds to range rather than all the birds have freedom to range. Conflicts between anti-business groups such as Choice and the ACCC who over-stipulate practices that are anti- bird welfare to produce uncertainty are apparently not covered as a risk to welfare.
m43	CEPAWA	We do not believe this has created uncertainty for various states, as each farmer should have been aware of their own codes of practice.
m70	Turi Foods	We do not believe there is uncertainty amongst processors, but the uncertainty could occur with consumers who are, perhaps, not as knowledgeable.

## RIS Responses- Question 5

In your experience, how does this type of uncertainty for industry adversely affect productivity? If possible, please provide some case examples		
Code	Submitter	Submission
m104	N Morgan	Consumers and the general public are not given actual facts; if they understood the pros and cons of cage vs free range better they may think differently. There is pressure on the industry to not use cages based on public perception, but the industry knows cages, particularly furnished cages, have a lot of advantages over free range. The industry is being forced to go against their better judgement on bird welfare.
m105	P Bell	Following the adoption of the 4th Edition of the MCOP in Australia some states adopted it in its entirety, others changed the wording to suit their legislative system. In the case of the new cage standards of 1/1/2008 the application of this was applied differently in some states e.g. NSW and Victoria.
m107	S Loughnane	Productivity is not what I am concerned about. But if it providing certainty around stricter animal welfare measures means more focus and productivity, then industry should also get behind these measures.
m98	B Williams	Proten operates in WA and NSW and so different standards add complexity when adopting national training and systems. We are likely to operate in other states in the future. I cannot see the need for different standards between states. Development applications for poultry farms is an obvious example of state differences, although not specifically related to this review. In our experience it has become very difficult to establish farms.
m156	C Keerqin	Management of the shed is the primary way to improve the productivity and the welfare of the animal.
m161	J Sanderson	Unsure. It will however lead to uncertainty about the use of technology or practices throughout the country.

m177	J Johnson	I don't believe it creates uncertainty between states. Food producers need to be well aware of the MCOP related to the industry and state and follow through on it. For e.g. the MCOP for the Transport of Poultry is a document that is quite clear. If there are State specific amendments to that MCOP then Managers in that state need to be made aware of those amendments and abide by them in that state.
m203	C Parker et al	We believe this uncertainty is de-incentivising innovative new businesses who would seek to develop new models of egg farming that meet welfare goals in different ways to those envisaged by current rules – especially those developing new forms of free range.
m22, m33	EFA, SQA	The uncertainty associated with varying state-based animal welfare legislation means that farmers are unable to work efficiently. It is often difficult to access information about farmers' obligations to the community and to the birds they care for and this diminishes their ability to effectively farm and ensure animal welfare outcomes simultaneously.
m39a	AVPA	AVPA is not well positioned to be able to comment on current uncertainty from an industry productivity perspective.
m68	ACGC	If different states were to adopt quite different standards (in particular with regard to stocking density) as a result of this review, there is the danger that processors would mitigate implementation costs by moving production to 'cheaper' states. The impact for contract farmers would be devastating: farmers have invested many millions of dollars in specific chicken farming assets that cannot be moved. As has been seen in the past two years, when a processor moves production from a state, the contract farmers lose their livelihood and their investment (Baiada exited Victoria in March 2016 and South East Queensland in January 2018). Therefore, the risk of implementation of a standard, if not unilaterally supported by processors can be devastating for farmers. Alternatively, processors may expect and require farmers to absorb all the costs of implementation, which would force some farms out of business because they would be unable to maintain viability and profitability. As farmers we acknowledge that decreasing stocking density is a desirable outcome for the community whose views are represented by consumer groups involved in the RIS. However, decreased stocking density must also be supported and costed appropriately by processors, and those costs must be ultimately passed on to end consumers of chicken meat.
m64	ACMF	We have no current (or past) examples in the animal welfare area. However, we can foresee significant issues if different standards are implemented by different states at the conclusion of this standards and guidelines process <a href="#">[refer to full submission]</a> .
m66, m67	Ingham's	Any uncertainty or inconsistency will impact industry adversely and this is also true for animal welfare requirements.
m56b	Name withheld by request	Uncertainty can create frustration, however rigid or punitive rules, induced by sometimes a poorly informed public or activist group, create poverty and also poor welfare outcomes. The industry itself has matured greatly with experience-driven training based on science and practice is creating a situation where practice is already leading the codes of practice. Codes of practice that restrict choice of system, use of tools, and

		apply an emotional reasoning with regard to animal welfare will create an uncompetitive, restricted, regressive industry. It needs to be allowed to adapt and apply ideas as it sees fit.
m92	Hon R Mazza MLC	Each producer would put in place different animal welfare programs based on their own interpretations of the Codes of Practice they were subjected to with varying degrees of implementation, resourcing and success.
m180	Pure Food Eggs	The egg market is a national market; it is essential that a uniform approach to production standards is adopted to ensure a level playing field.
m82	Baiada	Not currently a concern. However, if new standards are not adopted 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. i.e. a difference in stocking densities between states would result in increased cost of production in states with a lower maximum density. <u>[Refer to submission for detail]</u> .
m81	ATF	Any uncertainty or inconsistency will impact industry adversely and this is also true for animal welfare requirements.
m70	Turi Foods	With respect to animal welfare, we do not believe productivity is impacted currently. However, standardised stocking densities is very important across all states. Because of the significant cost impact of density, variations between States will create some companies/operations becoming financially less competitive if a state's requirements are more stringent than other states.

## RIS Responses- Question 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.

Code	Submitter	Submission
m35, m45, m56b, m86b, m104, m105, m107, m156, m161, m177, m196, m203,	Ag and Food WA;FEC; N Morgan; S Loughnane; Name withheld by request; C Keerqin; T Crowley; J Sanderson; P Bell; C Dolling; J Johnson; C Parker et al	[These responders ticked no with no further comment]
m98	B Williams	Yes. There is a growing trend in the industry toward corporate growers – i.e. companies that own and operate many farms under a common ownership and operating structure. This is logical and good for the industry in that this structure provides more support for individual farmers (in this case farm managers). These companies have scale and size to fund larger farming operations which become more necessary in this environment of ever increasing compliance costs. Proten is the largest corporate grower of this type in Australia and operate in two states at present (and likely to grow). Rural Funds Management is another. A Tabbita NSW farming complex is also owned by growers who operate in multiple states.
m22, m33	EFA, SQA	Yes. Many farms are integrated in different ways and the use of contracting farms infers responsibility for all assurance processes under specific brands.



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m39a	AVPA	Yes. Others would be better informed to be able to list.
m68, m64	ACGC, ACMF	Yes. ProTen and Rural Funds Management (corporate contract growers in Victoria and NSW), Darwalla Poultry (processor in Qld and NSW)
m67	Ingham's	Ingham's operates in all six States.
m70	Turi Foods	Yes. Darwalla (Poultry integrator), ProTen and Rural Funds Management (Contract farms)
m82	Baiada	Yes. ProTen Limited, Rural Funds Management
m92, m180, m81	Hon R Mazza MLC, ATF, Pure Food Eggs	No

## RIS Responses- Question 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.

Code	Submitter	Submission
m104	N Morgan	Farmers are already in debt as a result of the last changes in standards for cages. If we get rid of them again those individuals will be bankrupt.  Variation in free range systems, i.e. winter gardens, rocks to clean feet, caravan style. The benefits of having just open land versus having lots of enrichment in the range area - both are technically free range, but the one with more on the range will be utilized more and increase welfare but is more costly. How many birds must be on the range to be considered as free range is a concern.
m98	B Williams	Planning permission as referred to earlier.
m156	C Keerqin	Free range chicken farms suffer [greater] rates of mortality due to the nature of the rearing condition and the exposure to the parasites in the range. However, the public opinion usually maintain the support for the free range farms based on their own instinct without considering the cost and productivity.
m17	J Cordina, Cordina Chickens	Planning permissions. The great and diverse regulatory hurdles with regards to building new farms or sheds in different councils, let alone in different states, have cause immense amount of unnecessary stress and financial cost to farms and processors involved.
m22, m33	EFA, SQA	National consistency is imperative. For smaller farms looking to expand their business beyond a single state, this requires a thorough understanding of animal welfare laws in multiple states. Unfortunately, for many smaller farms, access to this kind of legal knowledge is not a resource that is easily acquired. Even for larger, more established farms, operation in multiple states can be confusing. Inconsistencies in state-based animal welfare laws can impact aspects of welfare. National standards are necessary and beneficial.

m39a	AVPA	Whilst there are minimal examples where current cross-jurisdictional inconsistencies may create issues, an example may be the ACT where caged egg production is not permitted. However, caged eggs from interstate are still sold in the ACT. This has the potential to be a major problem in future if the new standards are not adopted by all states and territories in their final form and in their entirety. There should be overriding Commonwealth legislation to ensure that all states and territories implement consistent legislation following acceptance of the new S&G to prevent some farmers/companies being able to obtain a competitive advantage over others in different states, similar to what has occurred in the European Union.
m68, m64	ACGC, ACMF	Regulatory hurdles faced in different states (and different councils) in order to obtain planning permission to build new farms (or expand existing farms), which can impact on the cost of a development, and is one of the reasons behind the geographical shifts of the industry that have been witnessed over the past decade.
m66, m67	Ingham's	For a national operation such as Ingham's, inconsistencies between states often mean that the highest requirement across all states is applied nationally, thus increasing costs due to greater restriction. It also influences national investment and growth strategies and may lead to less than optimal outcomes.
m56b	Name withheld by request	Poor interpretation of egg washing best practice.
m70	Turi Foods	Cost/time varies significantly across states. Whilst not relevant to animal welfare, makes some jurisdictions less productive.
m92	Hon R Mazza MLC	The effect of cross-jurisdictional inconsistencies means producers across Australia operate under varying degrees of minimum animal welfare requirements. For any national S&G to be effective, it needs to be applied consistently across jurisdictions
m180	Pure Food Eggs	NSW was very slow to enforce the increase in cage stocking density to 550cm per bird. This meant that some producers avoided the requirement to invest in new equipment, giving them a cost of production advantage. ACT banned the production of cage eggs, but cage eggs are still sold in that territory.
m81	ATF	Inconsistencies between states can influence national investment and growth strategies of industry participants and may lead to less than optimal outcomes.

## RIS Responses - Question 8

Do you think there needs to be national consistency in animal welfare standards for poultry? Please provide reasons for your answer.		
Code	Submitter	Submission
m104	N Morgan	Yes. We need everyone to be meeting a minimum standard of welfare. If the public know that all systems meet the same level of welfare it will change the viewpoint of only free range chickens are 'happy'.
m105	P Bell	Yes. National consistency provides a level playing field for competition. In the egg industry eggs are commonly traded across state borders.
m107	S Loughnane	Yes. Animal welfare should not be regarded as a matter up to any sort of 'discretion'. It should be firmly and consistently regulated, sending a message to consumers, industry and others that infractions against animal welfare will not be tolerated. Standards should not oscillate wildly between states – this sends entirely the wrong message.
m11	AWLQ	Yes. Nationally consistent standards are necessary to avoid confusion about what is expected by both producers and consumers. They also reduce costs of training for monitoring and assessment for compliance. However the proposed Standards are insufficient. They will only be sufficient when caged systems are prohibited and stocking densities are reduced to enable birds to easily express their innate behaviours, whilst receiving appropriate care and safety to protect them from suffering and harm, and without genetic or painful physical modifications.
m156	C Keerqin	Yes. The consistency of both rearing standards and the management of the animal could greatly minimise the possibility of mistreatment of animals and improved production.
m157	K Chaplin	Yes. Because birds will suffer with the lax laws of some states. As a society we value animal welfare, but some states [have] a higher proportion of industry members who have sway over state governments - birds must be protected from political power plays. The majority of Australians believe animals deserve better treatment and abhor the cruelty and suffering so many birds endure.
m161	J Sanderson	Yes. Gives international and national communities assurance that the expectations of our society are being met.

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m177	J Johnson	Yes. “What’s good for the goose is good for the gander” – there is no argument that we are all Australians and stick together.
m196	T Crowley	Yes, given there are operations that service multiple states a national approach is a must.
m203	C Parker et al	Yes. Eggs are a national market and it does not make sense to have different standards in different states. This could just create a “race to the bottom”.
m22, m33	EFA; SQA	Yes. Consistency in animal welfare law is imperative to ensure the appropriate standards for poultry welfare are maintained. It is the understanding of EFA that AHA have received upwards of 100,000 submissions to this public consultation and it is this broad interest in the issue of animal welfare that indicates to us that it is no longer enough to rely on voluntary and inconsistent state-based welfare legislation. We call for a national and enforceable standard of animal welfare that will decrease the current regulatory burden, provide farmers with clear regulation around care for animals, and provide the public with the comfort of knowing how hens are cared for around the country.
m35	Ag and Food WA	Yes. The implementation of different standards leads to market distortions. If prices are higher in one state than another, it is possible that products will move from low welfare to high welfare systems. Consumers may not be able to differentiate these products, leading to deceptive practices (at worst) or misleading market signals (at best).
m39a	AVPA	Yes. See comments for Question 7 above. Furthermore, the welfare requirements for poultry should not change depending on the state or territory where the poultry are housed.
m42	Cheralyn Simpson	Yes. Many companies, such as AAA eggs own farms across Australia. In order for them to maximise their effectiveness in animal welfare it is important to have consistency throughout all facilities. By having the same standards, farms will generally have similar production costs in turn stabilising the market value of eggs.
m86b	C Dolling	Yes. As seen repeatedly in the media, consumers are confused as to what [constitutes] free range and feel that they cannot rely on marketing from the egg industry. There is also increasing consensus that the government can’t be relied on to regulate this industry
m98	Bi Williams	Yes. Simplicity – if it doesn’t need to be different then make it the same. Integrators operating across Australia will be encouraged to increase production in ‘favourable’ states and reduce production in ‘unfavourable’ states. This places enormous hardship on growers who lose growing contracts as a result. The produce will find its way into all markets anyway and so nothing is achieved by different states regulations apart from higher cost and uncertainty in the industry and in the public.
m64	ACMF	Yes. Consistency is needed to create a level playing field for producers across Australia. Inconsistencies between jurisdictions in welfare standards will impact on the productivity and efficiency of chicken producers in different states and artificially distort where it is most efficient to produce

		chickens and therefore where the industry grows/contracts in the future. Also, consistency facilitates more effective communication of what standards producers must meet and a better understanding across the industry of what standards must be achieved.
m66, m67	Ingham's	Yes, consistency minimizes overall cost and optimizes the allocation of resources as indicted above.
m45	FEC	Yes. If there is not a national consistency then there is potential that states will be left at a disadvantage.
m159	Clairly Simpson	Yes. It would appear sensible to have a national code of practice to protect animal welfare.
m43	CEPAWA	Yes, there needs to be national consistency of animal welfare standards and guidelines, if some states were to implement different state policies to others, farmers are put at a risk of being less competitive and will be put at a disadvantage to other producers.
m17	J Cordina, Cordina Chickens	No/Yes. Welfare requirements for poultry should not change depending on the state or territory where the poultry are housed. Consistency is needed to create a level playing field for producers across Australia. Inconsistencies between jurisdictions in welfare standards will impact on the productivity and efficiency of chicken producers in different states and artificially distort where it is most efficient to produce chickens and therefore where the industry grows/contracts in the future. There needs to be an overriding Commonwealth legislation to ensure that all states and territories implement consistent legislation following acceptance of the new Poultry S&G. If different standards are implemented by different states at the conclusion of this process, then this could lead to unfair competition in the market. For example, if one state were to implement a very different maximum stocking density to other states, chicken producers could be put in a significant competitive advantage/disadvantage against producers from other states. For companies like us, who do not have chicken production operations in other states, 'importation' of poultry products from other states could lead to the loss of our market shares.
m56b	Name withheld by request	No, not really. The industry has become very professional and best practice is occurring with a very good mix between what happens in Europe and what happens in UK and USA. Australian businesses are very good at choosing techniques, despite what a naysayer like RSPCA says. The problems with Standards and the like is the people who they talk to or who are on the board or consulting group etc do not necessarily know what technologies are around the corner. Standards can accidentally stop innovation and can reduce the chance for things to be used (blinkers for birds) that should be used. There is no easy means to change the standards or allow a change on the fly which reduces industry efficiency and reduces the chance to introduce a new technique if it may come close to something someone decided was not good practice once upon a time, for perhaps his/her own reasons.
m48	LSSA	[Summarised] We support national consistency in animal welfare standards for poultry, and should involve 'triple bottom line' assessment. It is arguable that the draft Standards lack an emphasis on consumer expectations/preferences and animal welfare. The food market is national. Inconsistency between animal welfare codes among jurisdictions can make <i>"it difficult to effectively inform consumers"</i> of the relevant animal welfare standards, can create <i>"unnecessary regulatory burden that adds to the cost of doing business and makes it more difficult for farmers to</i>

		<i>understand their obligations</i> ”, and whilst state and territories can legislate against production methods, they can’t prevent sale of products produced with those methods produced in another state from being sold.
m70	Turi Foods	Yes. Consistency is essential to allow processors to be equally competitive. Animal welfare guidelines can impose significant costs to producers and it is unfair if producers in one state are permitted to have lesser standards, therefore lower cost of production compared to other producers. The consumer needs to have confidence that no matter where they purchase their poultry products, they were produced under the same animal welfare guidelines.
m92	Hon R Mazza MLC	Yes. Needs to be national animal welfare S&G that need to be uniformly implemented across jurisdictions to avoid inconsistencies, disruption to business and added red tape for industry. The S&G, as agreed to nationally, should be adopted by the State. This is in line with key objective of the former Australian Animal Welfare Strategy which was to “facilitate improved and sustainable animal welfare outcomes” as well as Australia’s animal welfare minister’s agreement in 2006 on the “need for a national consistent approach for...implementation and enforcement of animal welfare standards.”
m174	N Simpson	Yes. The Australian poultry industry is not large and therefore it would seem preferable to monitor its effectiveness on a national basis, cutting out unnecessary governance costs. This question should be reviewed when better statistics are available from businesses operating across state borders and their opinions.
m180	Pure Food Eggs	Yes. It is essential that all Australian layer hens are afforded appropriate welfare standards. It is also essential that, because the egg market is national, no state or territory has an advantage which might provide for lower production costs over and above those costs which are different because of geographical location.
m82	Baiada	Yes. National consistence is considered vital to 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.
m81	ATF	Yes. Consistency minimises overall cost and optimises the allocation of resources.

## RIS Responses - Question 9

Do you think that the net benefits to poultry welfare likely to be achieved under Option B, are justified?		
Code	Submitter	Submission
m66, m67 m86, m156,	Ingham's, C Keerqin; C Dolling	[These responders ticked yes with no further comment.]
m104	N Morgan	Yes. Farmers are already meeting welfare standards. They know if welfare is bad, production is bad. Meeting a certain level of welfare is already essentially mandatory.
m98	B Williams	Yes. The new standard draft has some enhanced aspects as discussed.
m17	J Cordina, Cordina Chickens	Yes. Even as a voluntary national standard and guideline, the new S&G would provide some certainty and guidance to the Australian producers, and hence improving the welfare of the birds.
m68, m64	ACGC, ACMF	Yes. Generally supportive of the new provisions in the proposed S&G and expect that they will be incorporated into voluntary guidelines that will result in some welfare benefits that (with the support of the processors) will be at an acceptable cost to individual farmers.
m56b	Name withheld by request	Yes. The industry is far, far more science based than animal welfare or now activist groups like RSPCA would attest. The industry simply reads more articles and understands poultry welfare better than RSPCA and other biased media propagandist organisations. The industry has mature bodies which can encourage best practice without the costly and restrictive and, at times, counterproductive intrusions of standards.
m70	Turi Foods	Yes. Current MCOP works well and could easily be used as voluntary guideline and included in the proposed new S&G. Some proposals in draft S&G would also improve welfare without imposing prohibitive costs on industry



m82	Baiada	Yes. New S&G offer some improvements compared to the existing MCOP and incorporate the findings of recent poultry welfare research. Farming practices also change over time and the standards should be periodically reviewed to ensure their currency. Improvements in poultry welfare could be expected to occur if the new S&G were voluntary, as has been the case with the existing MCOP.
m81	ATF	Yes. But believe that legislated minimum requirements are a better option.
m39a	AVPA	No/Yes. Whilst the main stream commercial industries may adopt voluntary standards, Option B would not guarantee improvements in poultry welfare outcomes with respect to all species and operations. There would also be no requirement to comply, which may affect poultry in businesses where welfare may not currently be a high priority or those that may operate outside recognised industry quality assurance programs.
m196, m159	T Crowley; Clairly Simpson	[These responders ticked no with no further comment.]
m105	P Bell	No. Certainty of legislation will provide a mechanism for compliance in areas of bird welfare.
m107	S Loughnane	No. I think any guidelines are better than none, and yes, an improvement in guidelines that promotes animal welfare is always justified. However, this is a very weak option – we need compulsory guidelines.
m11	AWLQ	No. Voluntary guidelines already exist. They have not changed the system to enable birds to express innate behaviours, prevent debeaking, etc.  Please rephrase the reference to “people’s subjective ethical preferences” to “people’s subjective values” and consider conducting an ethical assessment for all these options. While people may value different things i.e. have subjective values based on their culture and environment, ethics is universal and a scientific discipline grounded in two fundamental and observable facts (which neuroscience is increasingly finding relates to the hormones and chemicals in our brains) i.e. sentient being’s desire for survival and well-being, and our interdependence which requires an ethical decision-making process to determine the most feasible ethical outcome to meet the needs of all concerned.
m157	K Chaplin	No, because voluntary guidelines aren’t worth the paper they’re written on. Essentially, voluntary equals industry self-regulation and disregard for animal welfare (in favour of financial gains).
m161	J Sanderson	No. Guidelines have no impact on behaviour and cannot be enforced so are useless.

m177	J Johnson	No, I don't. Voluntary is just that, voluntary. Standards should not be voluntary, just like road rules aren't voluntary.
m203	C Parker et al	No. Enforceable guidelines are essential in order to ensure that every producer complies with minimum welfare standards. Voluntary guidelines would leave the door open for some producers to be non-compliant and therefore to undercut those who are, in good conscience, complying with the minimum guidelines. This is fundamentally unfair and could create an uneven playing field. Producers deserve a level playing field, where they can have confidence that, if others cheat, they will face enforcement action and penalties.
m22	EFA	No. Please note section Options.
m35	Ag and Food WA	No. Option B (guidelines only) is a voluntary compliance model that would do little to change the status quo. The disadvantages associated with different requirements in the various jurisdictions would remain in effect. We do not agree that Option B represents benefits to poultry welfare in comparison with Option A (status quo).
m42	Cheralyn Simpson	No. Without enforcement this option would not be effective.
m6	P Fraser	No. Anything other than mandatory requirements will not achieve net benefits to poultry welfare, and only then if far more stringent requirements are met.
m45	FEC	No. It is the appropriate and right time for welfare compliance to be mandated.
m63	WAP	No. Voluntary guidelines provide no assurance of any net benefit to poultry
m92	Hon R Mazza MLC	No. Option B would provide consistency but as they are voluntary, adoption between and within jurisdictions will be inconsistent.
m174	N Simpson	No. Providing guidelines with no regulatory assessment, continual review and amendment appears unnecessary and expensive. Suggest a 5-yearly review (page 53 Consultation RIS) gives no stability to invest in egg industry.
m180	Pure Food Eggs	No. Enforcing standards is preferable - Option B is essentially maintaining status quo.

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

m11, m161, m196, m203, m33, m35, m86b, m45	AWLQ; FEC; Ag and Food WA; T Crowley; J Sanderson; C Dolling; C Parker et al; SQA	[These responders ticked no with no further comment.]
m104	N Morgan	No. It is important that staff are trained in management, management is the main driver of the whole process, so the training aspect is imperative and should be mandatory.
m105	P Bell	No. It is often preferable to have a system which is voluntary and in this case there would be less costs but it is recognised there needs to be compliance as well.
m156	C Keerqin	No. Industries are driven by the cost and benefit yet the cost of the final product should be affordable to the general public. And the consumer demand may vary based on the income per capita hence a wide range of products should be available and affordable to all class of public.
m17	J Cordina, Cordina Chickens	No. If voluntary, the benefits of the new S&G will be greatly compromised. This will also lead to inconsistencies with respect to state and territory legislation. A nationally legislated welfare standards and guidelines will also give the general public reassurance and confidence in the Australian Poultry industry.
m22	EFA	No. Please note section Options [in our submission].
m39a	AVPA	No. The benefits of Option B may be compromised, particularly in the short term where there is no requirement to comply within a defined timeframe. However, over time, Option B could still result in the new standards being referenced in state animal welfare legislation with reasonable requirement to comply. The S&G could also be adopted as part of industry quality assurance programs, necessitating main stream compliance. Whilst there are no defined costs in the RIS associated with Option B, it is likely that compliance costs will still be associated with Option B and may be similar to Option C. If the new standards and guidelines were voluntary, this may also drive inconsistencies with respect to state and territory legislation.

m66, m67	Ingham's	No/Yes. Option E is clearly much less desirable given the excessive costs and the limited animal welfare impact that reduced densities would have.
m68, m64	ACGC, ACMF	Yes. We are supportive of the provision of certainty with respect to the standards that justifies the costs of Option C. On balance this option is preferable to Option B. Option B is preferable to Option E. The cost of implementation of Option E would impose a significant cost burden for chicken meat farmers, processors and consumers, while achieving little in terms of poultry welfare outcomes.
m107	S Loughnane	Yes. Only preferable to doing nothing at all. This option is very weak, and I don't believe industry would voluntarily put themselves out of pocket to protect hen welfare.
m156, m56b	C Keerqin; Name withheld by request	[These responders ticked yes with no further comment.]
m157	K Chaplin	Yes. At least it would be a step in the right direction, but would hold little real change.
m70	Turi Foods	No/Yes. Option C provides most certainty that cost is affordable to industry compared to B, however B is far more realistic from animal welfare outcome and financially over Option E.
m82	Baiada	<p>No/Yes. Option B is likely to result in improved welfare for all species of poultry. 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 existing MCOP. They could also reference the new S&amp;G in their legislation in a reasonably consistent manner.</p> <p>Option C would be preferable to Option B, as national consistency is also an important consideration and outcome of the process. Option B is preferable to other options (other than C), including E. Option E will result in increased costs of production without any guaranteed measurable improvements in welfare. The other options only related to limited classes of poultry. 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.</p>
m92	Hon R Mazza MLC	No. Option B would result in same problems currently associated with adoption of the existing MCOP. As Option B would be voluntary, it is not a desirable prospect from an animal welfare, consistency in application, cost to business or community expectation point of view.

## RIS Responses- Question 10

Do you think that the proposed national standards under Option C reflect community values and expectations regarding the acceptable treatment of poultry?		
Code	Submitter	Comment
m104	N Morgan	No. Where will this money come from? The consumer will have to pay more. Farmers are already meeting regulations - I think implementing strict and expensive regulations on them will be detrimental to the industry.
m42	Cheralyn Simpson	No. Propaganda from animal liberation groups have been shared thought-out the community depicting a damaging biased view of Australian caged farms. The majority of the population have not visited a caged facility. Their decision to support the phase-out of caged eggs is based on very detrimental images, words and anthropomorphism. These images and words are NOT reflective of current Australian farms.
m56b	Name withheld by request	No. I think benefits are difficult to quantify and some aspects of C are poorly considered.
m11	AWLQ	No. The Australian community is increasingly aware of and concerned for the well-being of sentient creatures, and are moving away from caged and intensively farmed products to small scale free range or vegan products, particularly younger generations, but also older thinking generations who are not bound by tradition. Attempting to deceive the public by allowing densities of up to 10 000 per square metre to be labelled free range is also not ethical or acceptable, and only makes the public more cautious about consuming poultry products.
m161	J Sanderson	No. They are inadequate as currently presented and constructed for a modern developed country that says it cares about welfare.
m203	C Parker et al	No. We believe these are an improvement on the current situation. However we do not believe that the proposed standards adequately reflect community values and expectations. A very high proportion of consumers buy free range and barn eggs, which indicates that a majority of Australians are very concerned about the cruelty of barren battery cages and are prepared to pay more to ensure that they are not buying eggs that come from such systems. This should be interpreted as a clear message to government that (i) animal welfare standards should address the cruelty of bare battery cages and that (ii) Australian consumers understand that this may increase costs.

m6	P Fraser	No. While standards must be mandatory rather than mere guidelines, there is no requirement to phase out caged production. An acceptable treatment for poultry is to eliminate caging altogether and in as fast a time as possible, but certainly less than 5 years.
m17	J Cordina, Cordina Chickens	No/Yes. Nationally consistent standards and guidelines for poultry that are scientifically sound and will improve poultry welfare and farming conditions across all species should be supported by the community [rest of comment was as per ACMF submission below].
m64	ACMF	<p>We do not believe that there has been sufficient work done to establish what community values and expectations are with respect to acceptable treatment of poultry, so it is difficult to answer this question with any certainty. Furthermore, we challenge whether community beliefs and expectations even necessarily equate to good welfare outcomes from the bird's perspective in all cases.</p> <p>Furthermore, one 'community expectation' that we feel has been overlooked to date is the expectations of consumers regarding poultry product pricing and affordability. Consumers have come to accept that the \$8 BBQ chicken at the supermarket as a 'given' How much would they be prepared to pay for changes in practice? While the RIS spells out the costs of implementation of various options, these costs have not been expressed in terms of what they will ultimately mean in terms of the price that consumers will need to pay for their poultry products, and it seems that the research necessary to determine how the majority of consumers feel about paying the extra costs associated with the implementation of particular standards, when it comes to the checkout, has not been done.</p>
m68	ACGC	<p>No/Yes. Community values and expectations of acceptable treatment of poultry are driven by community groups with an agenda to alter our industry entirely with little regard for respected science and cost-benefit analysis. It does not even equate to good bird welfare outcomes in all cases.</p> <p>Consumer expectations of the price of chicken meat has been groomed by the two major supermarkets with no acknowledgement of how welfare mandated changes in farming practices should increase prices. While the RIS spells out the costs of implementation of various options, these costs have not been expressed in terms of what they will ultimately mean in terms of the price that consumers will need to pay for their poultry products. Higher welfare options for the production of chicken meat mean a higher cost of that product to the consumer. If this cost is not passed through the value chain, consumers are being duped by not being informed about how their choices in welfare standards translate to cost at point of sale.</p>
m107	S Loughnane	No/Yes. Mostly. I don't think 'excess hatchlings' should just be killed. I think they should be attempted to be rehomed. I think we should also be taking a look at why 'excess hatchlings' are being born at all – animals are not a disposable product. If there isn't space or a market for these birds, then why are they being born at all? Where poultry are 'suffering' and must be killed to spare them 'undue suffering', I think there should be some veterinary contact so that factory workers aren't just killing birds out of convenience. It seems very blithe to have not really consulted around what individual suffering means to these birds – eg. no cortisol blood tests have really been done on cage hens to test what the environment does to them – but then to just hand the responsibility of defining what that means over to random factory workers. No. There needs to be a vet consulted. Similarly, non-experts should not be able to kill poultry just because there is a 'delay' in getting an expert to the scene. No, an expert should always be on hand.

		HOWEVER, if these standards do not phase out caged hens altogether, I cannot support them.
m177	J Johnson	No/Yes. Yes, but there are mistakes in it. I'll refer to them later [in my submission].
m39	AVPA	<p>No/Yes. It is difficult for the AVPA to make assumptions with respect to broader community expectations. However, it is reasonable to assume that the community would be supportive of nationally consistent S&amp;G for poultry that are scientifically sound and will improve poultry welfare and farming conditions across all species sectors.</p> <p>It is difficult to determine whether the community may be more supportive of welfare standards that may be considered to drive higher welfare rather than minimum standards. The changes to purchasing behaviour over the last decade, where supermarket sales of free range eggs compared to caged eggs have increased may demonstrate this. However, caged eggs are also still purchased by a reasonable proportion of the community so it is difficult to understand the full extent of the community's views with respect to the more controversial poultry welfare issues and whether there are other factors, such as price or perceived view of product quality that may also govern consumer choice.</p>
m98	B Williams	No/Yes. That's a very difficult question. The NSW survey is a good example of how opinion can be misread. Consumers like the concept of chickens roaming in green pastures when viewed in isolation of the practicality and cost of achieving it.
m159	Clairly Simpson	No/Yes. Very few people in the community understand the animal welfare discussions. Information put forward in the media from RSPCA and animal activist groups projects a very distorted view of poultry treatment. I believe national standards as per Option C are the correct way forward with animal welfare.
m156, m33, m196, m45	C Keerqin; FEC; T Crowley; SQA	[These responders ticked yes with no further comment.]
m105	P Bell	Yes. The S&G was an extensive and comprehensive [process] over several years. All states and territories were involved in the production of the S&G. Equal input was given by Governments, industry, and animal welfare groups. Option C will provide the best opportunity to achieve a balance.
m157	K Chaplin	Yes. As I mentioned above, Australia is a nation of animal lovers and if everyone understood what was involved in the production of birds, they would be appalled. Making changes, especially those that put an end to a few of the cruellest practices and increasing legal protections, is consistent with the values of 'humane treatment' and 'ethical' that so many Australians hold. The community expects a certain level of care and that birds don't suffer.

m22	EFA	Yes. Please note section Options and Responding Community Concerns [in our submission].
m66, m67, m81	Ingham's, ATF	Yes. We believe that once consumers' expectations regarding choice, availability and price of poultry products in addition to animal welfare are included in the assessment of consumers' expectations, then the proposed national standard under Option C is a reasonable reflection of community values and expectations. It is unreasonable to judge the animal welfare outcome completely separate from the issues of choice, availability and price of products.
m35	Ag and Food WA	Yes. There has not been a statistically valid survey of community values and expectations regarding the acceptable treatment of poultry but a level of interest and concern can be assumed, based on the increasing sale of products labelled as free range. In addition, the risks to poultry welfare presented by the use of conventional cages and the stocking densities for non-cage reared poultry in the proposed S&G are underestimated. These factors contribute to difficulty in drawing conclusions about the extent to which Option C reflects community values and expectations.
m63	WAP	No. Option C as currently written does not reflect acceptably treatment of poultry (as noted in our full submission). <u>[Drafting group to examine technical information provided within the submission]</u> .
m70	Turi Foods	No. Don't believe that there is enough evidence to establish what the majority of community expectations and values are in this area.
m92	Hon R Mazza MLC	Yes. Process of developing the S&G has successfully enabled stakeholders to provide scientific papers on animal welfare for inclusion when appropriate and has resulted in S&G with a list of things one 'must' and 'should' to ensure good animal welfare. It is fundamental that consumers know that animals kept for food production are cared for in manner which is not detrimental to their wellbeing. Consumers already have direct influence over production systems through purchasing decisions. Egg labelling regulations mandate provision of production system used to be on the carton, therefore if the consumer does not support a particular production system they can opt for a different one. Consumers should have freedom and right to purchase eggs from production system that suits their needs, budget and personal preferences.
m174	N Simpson	No/Yes. Community values can be coerced with misinformation spread by animal welfare groups and the RSPCA. How many people n Australian community have an opportunity to visit a cage egg system (biosecurity issues) or alternative egg production systems to enable an informed decision on animal welfare?
m180	Pure Food Eggs	Yes. 50% of consumers buy cage eggs. 90% of the food service industry buys cage eggs. More than half the population are comfortable with buying cage eggs. People who have visited our cage sheds have indicated a high level of satisfaction with what they observe. Cage eggs are cheaper than non-cage (barn and free range) eggs. Eggs are an essential protein based staple food and it is essential the price point remains where eggs are accessible by as much of the population as possible.



m190	NSW Young Lawyers	No. Draft standards do not reflect community values or expectations. The public would not consider the following acceptable if they were aware of them: continued use of conventional or battery cages; continued use of beak-trimming (including non-infrared); continued use of breeds with inherent genetic disorders; continued use of routine mutilations, which could be addressed through more appropriate breeding programs and environmental enrichment; continued deprivation of water for ducks. Also concerned about lighting conditions. <a href="#">[Refer to submission for detail]</a> .
m82	Baiada	Yes. It is difficult to comment on general community values and expectations and how these related 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 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 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. <a href="#">[Refer to submission for detail about stocking densities.]</a>

## RIS Responses- Question 11

Do you believe that the net benefits to poultry welfare likely to be achieved under Option C, are justified?		
Code	Submitter	Comment
m104	N Morgan	No. I think this may have the opposite effect in that farmers won't be able to meet the high cost and demand and farms will have to be shut down, reducing availability of eggs.
m11	AWLQ	No. Caged production (even if furnished) and intensive barn and free range systems with the proposed stocking densities still deprive hens of their capacity to have choices, walk, run, explore to find their own space, experience the pleasure of sunlight, and rain etc. These environments are unattractive for people to work in, let alone live in, and it is not ethically acceptable that we would force other sentient beings to live like this.
m6	P Fraser	No. Not unless caging is eliminated.
m45	FEC	No. Mandating welfare guidelines removes any conjecture or uncertainty around hen welfare
m68, m64	ACGC, ACMF	[refer to submissions for additional comments]  Yes. Agree that provision of some certainty with respect to the standards justifies the costs of Option C, with the changes summarized in [our submission].
m161	J Sanderson	No/Yes. In WA at least this would be ineffectual as stated [previously] due to the structure of the AW Act. Regulations need to be created to have effect. Replacing of the MCOP only may be possible for the guidelines but not the standards.
m177, m196, m293, m33, m156, m66,	Clairly Simpson; C Keerqin; T Crowley; J Johnson;	[These responders ticked yes with no further comment.]

m67, m159, m174	SQA; N Simpson	
m105	P Bell	Yes. Currently the MCOP is only a Code. Having the Standards in legislation will provide certainty.
m107	S Loughnane	Yes. All the improvements to animal welfare are justified. HOWEVER, cages need to be banned outright.
m157	K Chaplin	Yes. Because every incremental step to reducing the suffering of an innocent and vulnerable being is justifiable. Having legally enforceable protections will be an invaluable move in the protection of animal welfare—it's important all animals have protections under the laws of the nation they reside in. This is because it is right, and if we choose to ignore our morals and the pursuit of what is just, we diminish our standing and progression as a society. Science proves that birds (who are intelligent and capable of a range of emotions) suffer under so many farming practices in terms of physical and mental wellbeing.
m17	J Cordina, Cordina Chickens	Yes. There is a need for nationally consistent and legally enforceable standards to ensure poultry welfare is protected. Net benefits to welfare will be achieved under Option C.
m22	EFA	Yes. Please note section Options [in our submission].
m35	Ag and Food WA	Yes. The risks to poultry welfare presented by the use of conventional cages and the stocking densities for non-cage reared poultry in the proposed S&G are underestimated. <a href="#">[See Attachment 1 of submission]</a> .
m39a	AVPA	Yes. There is need for nationally consistent and legally enforceable standards to ensure poultry welfare is protected. Net benefits to welfare will be achieved under Option C.
m98	B Williams	Yes. With appropriate amendment Option C is justified. It provides clarity and some degree of simplicity by having one set of rules.
m63	WAP	No. Draft standards as proposed are inadequate to provide net benefits to poultry (see submission). <a href="#">[Drafting group to examine technical information provided within the submission]</a> .
m70	Turi Foods	Yes. Provided some changes [are made], Option C justify costs that will be incurred.

m92	Hon. Rick Mazza MLC	Yes, as standards are nationally consistent, implemented in each jurisdiction; clear what they ‘must’ and ‘should’ do; and consumers confident that high level of welfare is maintained.
m180	Pure Food Eggs	Yes. Option C provides for improved, enforceable standards for all production systems and maintains the supply of cheaper high quality eggs from cage systems, essential to ensure all Australian consumers have access to this staple protein
m81	ATF	Yes. Provided some adjustments are made, agree that the benefits in terms of animal welfare justify costs anticipated. <a href="#">[Refer to submission for recommended changes. DG to review]</a> .
m82	Baiada	Yes. Option C with necessary changes would ensure nationally consistent standards representing a significant and positive outcome for poultry welfare in Australia. . <a href="#">[Refer to submission for recommended changes. DG to review]</a> .

## Part b – Would the combination of costs and benefits under Option C be preferable to other options?

m104	N Morgan	No. I think farmers are already meeting standards, they just need increased consistency and public support.
m11	AWLQ	No. Option C should be introduced for the 10 year period if needed to phase out caged hens completely and while reduction in stocking densities occurs and changes in debeaking practices. These would at least help to marginally improve the lives of animals in the interim.
m203	C Parker et al	No.
m63	WAP	Not applicable as the estimation of costs and benefits is incomplete and in places is flawed.
m156, m177, m196, m33, m70	C Keerqin; T Crowley; J Johnson; SQA; Turi Foods	[These responders ticked yes with no further comment.]
m105	P Bell	Yes. Option C is the preferred option because it brings change, but not radical change, which would be an impost on both industry and consumers.

m107	S Loughnane	Yes. EXCEPT FOR THE OUTRIGHT BANNING OF CAGES. This is really the only acceptable option.
m98	B Williams	Yes. With appropriate amendment Option C is justified. It provides clarity and some degree of simplicity by having one set of rules.
m157	K Chaplin	Yes, because it's the only option that will make any difference; voluntary standards mean nothing and will lead to no changes. It gives producers no incentives at all to improve welfare, in what could be described as a race to the bottom.
m161	J Sanderson	Yes. If this is the best the working group could come up with then that's all we have to go on. Let's just hope a more progressive group exists next time and that it doesn't take another 15 years.
m17	J Cordina, Cordina Chickens	Yes. We agree that Option C, with the changes suggested in 'additional comments and suggestions' [in our submission] will provide the best balance of costs and benefits.
m35	Ag and Food WA	Yes. See Attachment 1 [of our submission. <u>DG to review</u> ].
m39a	AVPA	Yes. Option C will improve welfare for all species of poultry in all housing systems in a nationally consistent manner. However, in response to this question, AVPA recognises that its members' have divergent opinions, particularly with respect to welfare of hens in conventional caged housing systems. A consensus could not be reached within the AVPA subcommittee that formulated this submission or the wider membership.
m68, m64, m66, m67	ACGC, ACMF	Yes. We agree that Option C, with the changes summarised in [our] submission.
m45	FEC	Yes. There will be costs incurred by farmers with the implementation of Option C, though these costs are manageable as this will see improvements for hen welfare
m159	Clairly Simpson	Yes. This is the best option proposed by the RIS. Animal activist groups may not agree however many of their supporters are coerced by misleading media reports. It is important to understand cage production systems and this is difficult without actually visiting a cage facility (unlikely to be achieved due to biosecurity).
m92	Hon. Rick Mazza MLC	Yes. Combination of costs and benefits is preferred to other options as it adequately addresses issues of animal welfare, provides clarity to producers, allows jurisdictions to regulate the desired behaviour and provides guidance to all parties in the event of prosecution.

m174	N Simpson	Yes. The RIS may need to influence and educate animal welfare lobby groups regarding the research and benefits to animal welfare inherent with this option.
m180	Pure Food Eggs	Yes. The other options don't provide for the same level of enforcement and would undoubtedly provide for worse welfare outcomes.
m82	Baiada	Yes. Combination of costs and benefits under Option C is considered preferable 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.
m81	ATF	Yes. Option C with appropriate modifications is the preferred option.

## RIS Responses - Question 12

Part a - 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?

Code	Submitter	Comment
M104	N Morgan	No. Where are all the additional layers going to be housed? Also mortality is high in other systems and production reduced, so you will need even more birds.
M105	P Bell	No. The debate on the banning of cages does not take a holistic view of all factors. Essentially the anti-cage position is one based on interpretations of animal behaviour and ignores the elements of disease, mortality, and injurious pecking.
M156, m33, m159, m174	C Keerqin; Clairly Simpson; SQA, N Simpson	[These respondents ticked no with no further comment].
M196	T Crowley	No. As listed in the proposed S&G there are benefits and disadvantages to all three farming systems. It is imperative that all three systems are retained.
M22	EFA	No. Please note section Options {in our submission}.
m42	Cheralyn Simpson	No. Benefits of caged systems far outweigh all other commercial egg farming methods. I think it is very important to have more than one kind of egg production method. If one system were under duress the alternate system would continue to supply eggs for consumers. This alleviates the need to import eggs into Australia. Free range farms are generally located on flood plains. Flooding could affect production in free range operations. Caged egg facilities are significantly more resilient to ... avian influenza.
m98	B Williams	No. Doubtful welfare benefits at huge cost.

m45	FEC	No. Caged production has the lowest mortality and highest production of the three systems. Banning caged eggs is removing an important food production that provides healthy meal options for low income families.
m92	Hon R Mazza MLC	No. More research needed in production system vs. management, biosecurity, carbon footprint, and pressures on small to medium sized businesses. [Refer to submission for detail].
m70	Turi Foods	No. Extensive costs for little benefit.
m180	Pure Food Eggs	No. The banning of cages is not in the interests of the community due to the loss of lower priced eggs for working families and the impost on cage egg farmers, who simply could not afford the cost of establishing alternative systems. The ultimate outcome would be a chronic shortage of eggs, and the possibility of imports to fill the gap. Upstream contributors to the industry would also be affected, particularly grain farmers in regional areas who rely on a viable egg industry to support their farming enterprises. Furnished or enriched cages are still cages, unlikely to be acceptable to the activist organisations such as RSPCA and Animals Australia.
m82	Baiada	No. Recognise 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. Phase out of conventional cages has potential to impact meat chicken breeding programs as cages required for individual bird traceability. [Refer to submission for detail].
m6	P Fraser	No. Caging must be phased out over a much shorter period and in any case less than 5 years. I simply do not trust the political and / or bureaucratic system to be able to sustain a long term policy position without substantial changes as time proceeds. It is far better to eliminate unethical practices in the immediate or very short time frame and allow industry to adapt to a new paradigm in as short a time possible.
m39a	AVPA	<p>No/Yes. The AVPA recognises that its membership has divergent views on this issue and a consensus could not be reached within the subcommittee that formulated this submission or the broader membership. The inability for hens to express the full range of innate behaviours when housed in conventional cages is well recognised. However, welfare is considered to be multifactorial and there are considered to be other advantages for welfare when hens are housed in cages. For example, lower mortality, better disease control and protection from predation. Conventional cages and furnished cages should also be considered separately in light of different outcomes for welfare.</p> <p>The majority of respondents to the AVPA membership survey that was conducted to help formulate this submission were of the opinion that the welfare needs of hens can be met when hens are housed in conventional cages. However, others are of the opinion that welfare of hens in conventional cages is compromised.</p>
m107	S Loughnane	Yes. Banning all conventional cages can be the ultimately victory of this review. It's what needs to happen. Unquestionably.



m11	AWLQ	Yes. This is one of the necessary options. Due to the same evidence of the unacceptability of caged poultry production and the even more extensive consultation process occurring 17 years ago at the National Hen Housing Review, implementing Option D within 10 years for all production birds is appropriate.
m157	K Chaplin	Yes. I want it to be 10 years (or better yet, much less than 10!) Really, if we know it's wrong now, we should ban them now.
m161	J Sanderson	Yes
m177	J Johnson	Yes. 10 and 20 year terms are vastly different lengths though. I'd suggest 10 years.
m203	C Parker et al	Yes. This option would put Australia in line with the higher standards internationally in the UK, EU and NZ. It would assist in harmonizing NZ and Australian food standards as is supposed to be happening under the binational food standards regime. It would also alleviate some of the worst suffering for layer hens by providing enrichment in cages – while still allowing plenty of time for industry to adjust and to invest in new equipment. Ideally we would like to see even greater welfare improvements for layer hens (by means of a regime of continuous improvement to meet higher welfare outcome standards) and the eventual banning of all cages (as in Sweden). Of the options proposed Option D (in combination with other options) provides the best starting point.
m35	Ag and Food WA	Yes. Western Australia supports Option D1 - See Attachment 1 [of our submission. <u>DG to review</u> ].
m190	NSW Young Lawyers	No/Yes. Net benefits to poultry welfare likely to be achieved under Option D are justified. Committee concerned that the summary of 'positive and negative' welfare impacts in Option D is inaccurate as it compares costs and benefits of caged and non-cage systems rather than costs and benefits of conventional and furnished caged systems. Based on scientific evidence in the FRWSR, and that other countries have already made decision to phase out conventional/battery cages, committee considered it uncontroversial that the net benefits of poultry welfare likely to be achieved under Option D are justified.
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?		
m196, m33, m98, m70, m92,	B Williams; T Crowley; SQA, Hon R	[These respondents ticked no with no further comment.]

m174, m180, m82,	Mazza MLC; N Simpson; Pure Food Eggs	
m104	N Morgan	No. The welfare risks outweigh the benefits. Furnished cages are the best system in my opinion.
m105	P Bell	No. The large cost of a phase out of cages either over a 10 year or 20 year period would not be offset by benefits. Cages still provide welfare benefits over other systems; a change to non-cage systems would require greater flock numbers due to reduced productivity.
m177	J Johnson	No. Option D is about confinement. That is not the only criteria in assessing animal welfare. Therefore, as a stand-alone option to improving welfare – we cannot just choose this option alone. I think that this option D should be chosen in combination with C – but also go the 10 year timeframe.
m22	EFA	No. Please note section Options [in our submission].
m42	Cheralyn Simpson	No. Option D is not cost effective for any commercial egg farmer with a caged facility. Costs for the consumer will be considerably more under Option D. Free range facilities require more land and cannot be located in warm environments. Transportation costs to supply eggs to these environments will be significantly higher. Caged facilities are climate controlled and can be situated anywhere in Australia reducing costs of transport. Alternative systems to caged facilities are more labour intensive resulting in higher production costs.
m45	FEC	No. There was large amounts of investment only 10 years ago into conventional cages. Farmers are still paying debts, and also there would need to be a significant increase in free range over that time period to compensate for drop in production.
m159	Clairly Simpson	No. Not viable for all farmers presently operating cage hen facilities. Many small farmers would cease to operate and large farmers would lose financially should this be implemented. Option D will remove the choice for consumers and force production costs to rise. This could then flow on with increased retail egg prices.
m6	P Fraser	No. Unless substantial change can occur it would be preferable for no change until there is such an outcry about animal cruelty that change will be swift and comprehensive. Making a substantial change now would be preferable to a more chaotic change at a later date.
m39a	AVPA	No/Yes. The AVPA Executive conducted an opinion poll to determine whether its membership was supportive of Option D. This was due to the divergent opinions expressed by the AVPA subcommittee who formulated this submission. The results of the AVPA membership survey confirmed that a consensus could not be reached to be able to answer this question. There are strong opinions both for and against Option D. 48% of respondents did not support phasing out conventional cages under Option D. A further 20% acknowledged that the different housing systems have

		advantages and disadvantages and it is difficult to make a decision either way. 26% of respondents supported a phase out of conventional cages under Option D.
m107	S Loughnane	Yes, the total banning of cages is the most appropriate step forward for animal welfare. This, in concert with option G – to outlaw also these barbaric practices.
m11	AWLQ	Yes. Option D needs to be in combination with other options. There are still too many ethical flaws in the other non-cage systems which also need to be addressed.
m156	C Keerqin	Yes
m157	K Chaplin	Yes, as a combination of other options.
m161	J Sanderson	Yes. Let's not get too far behind places like the EU. The cost will never be borne by industry alone but by all of us as consumers.
m203	C Parker et al	Yes. See [response to previous question].
m35	Ag and Food WA	Yes. Western Australia supports Option D1 - See Attachment 1 [of our submission. <a href="#">DG to review</a> ]

## RIS Responses - Question 13

Do you believe that the net benefits to poultry welfare likely to be achieved under Option E, are justified?		
Submission Code	Submitter	Comment
m104	N Morgan	No. Indeterminable suggests we may not see any benefits? A great deal of research has been conducted on stocking density and we have the optimum currently to meet bird welfare and keep production.
m105	P Bell	No. There is a very large cost to reduce stocking densities in non-cage layers. The Victorian Welfare Review [FBWSR] notes that there did not appear to be welfare advantages in reducing density from 12 birds/m <sup>2</sup> down to 9 birds/m <sup>2</sup> .
m98	Bill Williams	No. This is a flawed concept that will increase the cost of chicken to consumers. Look at the European situation where this has been done to death. Management, housing facilities and breeding will have a far greater impact on welfare than stocking density alone.
m17	J Cordina, Cordina Chickens	No. We do not believe that the proposal of a reduction of stocking density for meat chickens to 30kg/m <sup>2</sup> will achieve net benefits to poultry welfare. <a href="#">[Refer to submission for references and evidence]</a> .
m196	T Crowley	No. Research shows that there is no difference below 38kg so no need to lower the kg.
m22	EFA	No. Please note section Options [in our submission].
m33, m66, m67	SQA, Ingham's	These respondents ticked no with no further comments
m39a	AVPA	No. The scientific evidence with respect to stocking densities is lacking in order to substantiate a reduction from the previous maximum permissible densities for all species of poultry. <a href="#">[Refer to submission for references and evidence. DG to review]</a>

m68	ACGC	No. Reducing the stocking density to 30kg/m <sup>2</sup> in Option E is not supported. ACGC believe there are no benefits to poultry welfare delivered by Option E, and furthermore the huge cost of its implementation, as documented in the RIS, would be devastating to the overall Australian industry, the overall Australian economy and to Australian consumers' ability to buy affordable chicken meat. <a href="#">[Refer to submission for evidence]</a> .
m64	ACMF	No. We challenge whether any benefits to poultry welfare would genuinely and consistently be delivered by option E, let alone that they would justify the huge cost of its implementation, as documented in the RIS. <a href="#">[Refer to submission for evidence]</a> .
m45	FEC	No. There is very little science concerning stocking density that [demonstrates] animal welfare is improved when [decreasing] stocking density.
m70	Turi Foods	No. Evidence cannot be shown that 30kg/m <sup>2</sup> achieves a significant benefit to the animal vs. 34 or 36kg/m <sup>2</sup> . Refer to submission for detail
m92	Hon R Mazza MLC	No. Giving more space per animal does not automatically translate to better animal welfare. Focus should be on the appropriate management of system rather than stocking density per se. <a href="#">[Refer to submission for detail]</a> .
m180	Pure Food Eggs	No. The stocking densities for layer hens under Option C are those currently typically adopted by industry. Simply, they work! Farmers work closely with their livestock and are in a much better position to evaluate stocking densities of their valuable livestock than those who are unlikely to have ever set foot on a poultry layer farm. Stocking densities which are too low can lead to lower shed temperatures, particularly in cooler climate areas, which can cause the birds to “huddle”, increasing the risk of smothering.
m82	Baiada	No. Not supported as no evidence that it will equate to an improvement in welfare outcomes for meat chickens despite significant cost to industry. Unclear why 30kg/m <sup>2</sup> was selected for Option E as this density is also not supported by research. Management factors considered more important than stocking density based on experience and research. Australian climate dictates that circumstances may not be necessarily comparable to overseas experience with respect to welfare and stocking density. Stocking densities in Australia are lower than the rest of the world. <a href="#">[Refer to submission for detail]</a> .
m159	Clairly Simpson	No/Yes. To reduce stocking density from existing cages by for example removing 1 bird from each cage will cost farmers money with infrastructure improvements and loss in productivity. I do not believe animal activists or the RSPCA will settle for purely stocking density adjustments for cage egg producers.
m35	Ag and Food WA	Yes. The risks to poultry welfare presented by the use of conventional cages and stocking densities for non-cage reared poultry in the proposed S&G are discussed in Attachment 1. These risks can be mitigated by reducing stocking densities. Scientific evidence supports the proposition that reduced stocking densities will result in animal welfare benefits.

m107	S Loughnane	No/Yes. These moves are positive, but they don't go as far as banning cages outright – this is far preferable.
m11	AWLQ	Yes. While Option E is expensive it is also ethically necessary. Costs to reduce stocking densities can be recouped through an extensive education program to enable consumers to understand the ethical benefits of paying more, and to show comparative costings in relation to other frequent non-essential purchases such as coffee. The growth rate of animals is also a major concern and animal selection should move towards slower growth rates which are more natural and therefore less harmful to birds. Alternative practices in slaughterhouses also need to be required to reduce stress and suffering.
m156	C Keerqin	Yes
m157	K Chaplin	Yes. Chickens need space and a cleaner environment, they literally stand in their own faeces until they are taken away and killed. Access to fresh air should go along with this.
m161	J Sanderson	Yes. There was research in 2000 from the EU that showed that densities even lower than this were desirable.
m177	J Johnson	Yes. Broilers: Reduction of 10kg/m <sup>2</sup> from 40kg/m <sup>2</sup> to 30kg/m <sup>2</sup> is an obvious improvement to animal welfare.
m203	C Parker et al	Yes. Much of the worst suffering for layer hens and meat chickens occurs because of overcrowding in barns. Confinement at high stocking densities inside barns and in large flock sizes frustrates natural behaviours and social organization, leading to frustration and stress driven behaviour. Lower stocking density and group size within both barn systems and barn plus range systems may provide more opportunity for natural behaviours and less stress. <u>[Refer to submission for evidence]</u> .
m48	LSSA	[Summarised] We note that the draft Standards continue to permit battery cages for hens. The keeping of the status quo would appear to be contrary to the views of animal welfare organisations, some State and Territory governments (e.g. ACT, Tasmania, WA), retailers, consumers and scientists. In addition, the draft Standards would appear to be inconsistent with a number of countries and regions in the world that have specifically banned battery cages or are in the process of a phase out (e.g. European Union, New Zealand, Canada). We note that the draft Standards to not include reduced stocking densities for poultry - the draft Standards provide a hen with a space that is smaller than an ordinary sheet of A4 paper and prohibits wings to be outstretched. The stocking densities proposed are higher than the countries that lead the world in poultry welfare.

Part b- 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?

m70, m92, m174, m180, m82	Turi Foods; Baiada; Hon R Mazza MLC; N Simpson; Pure Food Eggs	No
m104, m105, m107, m45, m159, m98	N Morgan; FEC; S Loughnane; Clairly Simpson; P Bell; B Williams	No. May not see any benefit for such a high cost.
m17	J Cordina, Cordina Chickens	No. Due to the lack of concrete scientific evidences supporting the welfare benefits of reducing stocking density for meat chickens from Option C to 30 kg/m <sup>2</sup> , and the very substantial costs of such a change would cost the Chicken Meat Industry and ultimately the Australian public, we DO NOT believe that the Option E is preferable to other options.
m196	T Crowley	No. Research shows that there is no difference below 38kg so no need to lower the [density].
m39a	AVPA	No. There is limited justification for a reduction in stocking density based on a review of the available research. Based on survey results, the support for Option E in combination with Option C or other options is considered low amongst AVPA members.
m64	ACMF	No. As described above, it has not been proven that welfare benefits would necessarily be derived from reducing density to 30 kg/m <sup>2</sup> , whereas the very substantial costs of such a change have been clearly documented in the RIS. Insofar as meat chickens go, that cost of Option E does not justify the possible welfare benefits.
m68	ACGC	No/Yes. As described above, it has not been proven that welfare benefits would be derived from reducing density to 30 kg/m <sup>2</sup> , whereas the very substantial costs of such a change have been clearly documented in the RIS. A reduction in stocking densities will lead to an increased demand for shedding which puts pressure on land use, planning schemes and significant costs to farmers in capital expenditure. A reduction in stocking densities of any magnitude will only be possible for industry to cope with if costs are passed onto the end consumers. We make special note that the market incentive to prioritise productivity is entirely in the hands of the processors not the farmer, who is however

		responsible for the welfare of the bird for the majority of its life. We support a manageable reduction in stocking density that addresses the economic costs and benefits as well as community perceptions of welfare.
m35	Ag and Food WA	No/Yes. In addition to the reduction in stocking densities, which provides welfare benefits to non-cage reared poultry, Option D (1) is justified to mitigate the risks to poultry welfare presented by the use of conventional cages. It is of concern to this Department that the welfare risks associated with the use of conventional cages are underestimated, as explained in Attachment 1 [of our submission].
m156, m161, m203, m157	C Keerqin; J Sanderson; C Parker et al; K Chaplin	[These respondents ticked yes with no further comment.]
m11	AWLQ	Yes. Options D is preferable and essential as well as Option E and G. They all require education of the community to understand why they need to pay more for eggs and poultry meat. Accurate images like on cigarette packaging, and not marketing images, as on cigarette packages in days gone by, need to be shown wherever eggs and birds are sold for consumption, so that consumers can decide based on the facts about the way animals are being kept which product will enable birds to live more naturally. If Options D, E and G occur in tandem this will save costs on both regulation and education. The costs for consumer education can then be assisted by government and animal welfare organisations, and the gain in selling price for eggs and meat birds, will help to alleviate the costs for producers.



## RIS Responses - Question 14

Do you believe that the net benefits to poultry welfare likely to be achieved under Option F, are justified?		
Code	Submitter	Comment
m104	N Morgan	Yes. It is imperative birds have nests and perches and scratch pads to enhance welfare of caged hens.
m156, m161, m177, m33	C Keerqin; J Sanderson; J Johnson; SQA	[These respondents ticked yes with no further comment.]
m157	K Chaplin	Yes. They should have these enrichments to their short, miserable lives.
m203	C Parker et al	Yes. See comments above in relation to Option D. We also believe that meat chickens should be offered enrichment opportunities inside sheds as currently required by the RSPCA Approved standard for meat chickens <a href="#">[refer to submission for evidence]</a> .
m22	EFA	Yes. Please note section Options [in our submission].
m35	Ag and Food WA	Yes. The risks to poultry welfare presented by the use of conventional cages and the stocking densities for non-cage reared poultry in the proposed NSG are underestimated. See Attachment 1 [of our submission].
m107	S Loughnane	No/Yes. These moves are positive, but they don't go as far as banning cages outright – this is far preferable.
m48	LSSA	[Summarised] We note that the current Code includes mandatory requirements in respect of nests. No explanation has been provided as to why the draft Standards have removed this mandatory requirement and converted the condition to a recommendation only. The EU and Canada support nests, perches, and litter.
m39	AVPA	No/Yes. Various scientific reports have demonstrated improvements with respect to hen welfare when nests, perches and space to forage are provided. However, furnished and colony cages were not reviewed in the supporting scientific documents in order to appropriately inform

		the S&G and the RIS options, particularly Option F. This is considered to be a significant flaw and impedes the ability for the community to make a more informed opinion with respect to Option F. <a href="#">[Refer to submission for evidence]</a> .
m105	P Bell	No. There are several elements to Option F. Nests and perches are generally provided in all non-cage systems. There are some fully slatted sheds that do not have a litter section and this is chosen to reduce the risks of disease to the birds and remove a potential source of salmonella contamination. The proposal to have all these features in cages is essentially suggesting that furnished cages be installed. The proponents of this section have said they are opposed to furnished cages and thus appears to be a mischievous claim.
m11	AWLQ	No. Option F is unacceptable. <a href="#">[Refer to submission for detail]</a> .
m196	T Crowley	No, there needs to be more research before this can be confirmed as a net benefit to all layers.
m42	Cheralyn Simpson	No. As previously explained in question 2, certain behaviours by chickens are not relevant in caged farms. Behaviours such as nesting appear to be learnt. Farmers have to encourage chickens to use nesting boxes in free range systems to enable easier collection of eggs.
m45, m56b, m159	FEC; Name withheld by request; Clairly Simpson	No
m92	Hon R Mazza MLC	No. The RIS highlights that when a nest, perch or litter is available the birds use it. However, if these components are not provided, the birds adapt well to their environment. <a href="#">[Refer to submission for evidence]</a> .
m174	N Simpson	No. This option is the same as adopting D. I do not believe welfare groups will settle for this option long term and costs involved make it a superfluous option.
m180	Pure Food Eggs	No. Nests, perches and litter in cages are essentially furnished or enriched cages, which are still cages, unlikely to be acceptable to the activist organisations such as RSPCA and Animals Australia.

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?		
m92, m180	Hon R Mazza MP, Pure Food Eggs	No
m174	N Simpson	No. Gives no assurance to producers for any long-term acceptance from RSPCA or animal welfare groups who are endeavouring to implement option D

## RIS Responses - Question 15

Do you believe that the net benefits to poultry welfare likely to be achieved under Option G, are justified?		
Code	Submitter	Submission
m45, m159, m92	FEC; Clairly Simpson, Hon. R Mazza MLC	No.
m104	N Morgan	No. Feather pecking and cannibalism affects all birds in all production systems. When laying birds are kept in systems that give the opportunity for aggressive birds to contact many other birds, cannibalism and feather pecking can spread rapidly through the flock and result in injuries and mortality. Farmers are experienced in these needs.
m105	P Bell	No. My comments are based more on a “no-yes” basis. Castration, pinioning and devoicing are not used in the commercial egg industry and it would be appropriate to ban these. In the case of beak trimming, this remains a valuable tool in protecting laying birds from serious injury and death. The vast majority of layer pullets are treated with infrared at day old which is accepted. The use of hot blade may occur in very small hatcheries who cannot afford an infrared machine. In the case of a hot blade second trim there are often cases where this would save large numbers of birds where injurious pecking (causing death) is occurring.
m42	Cheralyn Simpson	No. When I was living on our commercial egg farm hens had been beak trimmed before arriving at our farm. We never experienced any problems with this. As they are carnivores and have a pecking order I think it is a very important practice for their welfare.
m174	N Simpson	No. RIS recommendations cover human requirements in these areas. Circumstances can dictate need for different actions as discussed under option G. Matters should be left as stated in the S&G.
m180	Pure Food Eggs	No. Smaller hatcheries cannot afford infrared equipment.
m82	Baiada	No/Yes. Castration, pinioning and devoicing should be banned as per standards in existing MCOP. Meat chicken and Turkey breeders - routine second beak trimming by hot blade method supported <a href="#">[refer to submission for detail]</a> .

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m81, m66, m67	ATF, Ingham's	No/Yes. There are welfare benefits from banning castration, pinioning and devoicing and these practices are not practices that the commercial turkey industry employs. However, do not support the banning of routine hot blade beak trimming for turkey breeders as we believe the economic and animal welfare costs outweigh the likely animal welfare benefits.
m22, m33	EFA, SQA	No. Option G will require greater consultation between government and poultry professionals in industries other than farming. We remain eager to ensure these welfare benefits can be better defined and further understood through the development of the decision RIS.
m56b	Name withheld by request	No. The disadvantages to G are far too great for it to be implemented. Extraordinary pain and awful deaths will be the result. All solutions must be available
m39a	AVPA	No/Yes. These different procedures should not be grouped together. Therefore, an overall response to this question cannot be provided. Castration and devoicing: Castration and devoicing should all be banned for commercial poultry, as they were in the MCOP. Pinioning: There may be sound justification for pinioning in the case of pheasants. Routine second beak trim: A subsequent routine beak trim, using hot-blade, performed by skilled operators and only if a maximum of a third of the beak is removed, should be permitted with sound justification. <u>[Refer to submission for lengthy response. DG to review]</u> .
m11, m156, m157, m161, m177, m203, m68	AWLQ; C Keerqin; ACGC; J Sanderson; J Johnson; C Parker et al; K Chaplin	[These respondents all ticked yes with no further comment]
m64	ACMF	Yes. With respect to the matter of banning routine second beak trimming, this could deliver net benefits, as long as it does not lead to producers being excessively cautious in using this as a means of preventatively managing pecking and cannibalism. To overcome this, it is suggested that the wording of this provision be modified, perhaps by removal of the words "except in exceptional circumstances" and by insertion instead of the words "following a documented risk assessment by an appropriately qualified person."
m107	S Loughnane	Yes. These are very positive changes that I support wholeheartedly. These practices should be abandoned immediately as a cost-effective but cruel way to address problems of overcrowding. The real solution is, of course, to reduce overcrowding by BANNING CAGES OUTRIGHT. OPTIONS D and G ARE IDEAL.
m98	B Williams	Yes. Not an issue in Australia anyway.

m196	T Crowley	Yes. There is strong scientific evidence to support this.
m48	LSSA	[Summarised]. We note that since the current Code came into operation in 2002, devoicing and castration of chickens has been prohibited, describing devoicing and castration as “an unacceptable practice [that] must not be undertaken”. We query why such a practice has been reintroduced into the draft Standards; it’s banned in the EU. There is a body of evidence regarding the welfare issues surrounding the practice of beak trimming. We query why it is proposed to change the requirement that beak trimming only be performed by veterinarians, to approve anyone perform beak trimming provided they have “appropriate tools and methods”. ACT has banned unless performed by a vet. EU and Canada only allow qualified staff on laying chickens <10 days old.
m70	Turi Foods	Yes. Castration, pinioning and de-voicing are not practiced in chicken meat industry and should be banned. Second beak trim needs to be allowable option in some systems when required but would need satisfactory restrictions in place to ensure it is not a routine practice.
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?		
m104, m33, m45, m56b, m159, m92, m180	SQA; N Morgan; FEC; Name withheld by request; Clairly Simpson, Hon R Mazza MLC; Pure Food Eggs	[These respondents ticked no with no further comment.]
m177	J Johnson	No. Option G is about pain only. That is not the only criteria in assessing animal welfare. Therefore, as a stand-alone option to improving welfare – we cannot just choose this option. I think that this option G should be chosen in combination with C, D, E and F.
m22	EFA	No. Please note section Options [in our submission].
m39a	AVPA	No/Yes. All procedures listed under Option G should not be grouped together. Therefore, an overall an answer to this question cannot be provided. Yes - Banning of castration and devoicing of commercial poultry should be included in addition to Option C, as these procedures are not performed and not justified. No- A routine subsequent hot blade trim should be permitted provided that it is well justified on

		welfare grounds and in accordance, performed by trained and skilled operators and within the parameters. No- Pinioning should be permitted in the case of pheasants, where there is sound justification on welfare grounds.
m105, m156, m196, m203, m68, m64, m66, m67	ACMF, ACGC; C Keerqin; T Crowley; P Bell; C Parker et al, Ingham's	Yes with changes made as previously described in [our] submission[s].
m11, m157, m107	AWLQ; S Loughnane; K Chaplin	Yes. In combination with Options D and E as above.
m98	B Williams	Yes. But only in combination with Option C. Some flexibility for second beak trimming in the case of pecking etc. would be required.
m161	J Sanderson	Yes. Let's get with the times, this shouldn't even be up for discussion or needing public input to know the answer.
m70	Turi Foods	Yes. If there are some modifications, as detailed [in our submission], Option G would be preferable when combined with Option C.
m174	N Simpson	No. Hatchery and egg producers to determine necessity for these standards as per their individual circumstances.
m82	Baiada	No/Yes. Yes – castration, pinioning and devoicing not practiced and banning these could be combined with Option C to improve welfare outcomes for poultry. No- ability to perform routine second beak trim by hot blade method must be retained on welfare grounds.

## RIS Responses - Question 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?

Code	Submitter	Submission
m56b	Name withheld by request	B would be the very best outcome for poultry welfare and business confidence and consumer choice in Australian, and economic food provision. It is a shame that such considerations as food security are not also a consideration with regard to welfare.
m104	N Morgan	B and F. We need to keep cages, ideally have furnished cages with perches, nests and scratch pads. This would result in better welfare whilst maintaining production and health. Farmers are already doing a great job of maintaining bird welfare, it could just be improved with some enrichment.
m105	P Bell	C. There are numbers of competing forces in this equation: animal welfare (and what it means to different people), effect on the egg business, access to capital, effect on the environment, food safety, worker safety, food affordability, and consumer expectations. The key point in welfare should be freedom from illness and death. On balance Option C gives the best outcome.
m22, m33, m159	EFA; SQA; Clairly Simpson	Option C would provide the greatest net benefit for the Australian community. <a href="#">[Refer to submission m22 and m33 for evidence]</a> .
m42	Cheralyn Simpson	C. Options A and B won't be effective. Options D, E, F and G have been created to indulge animal activists without scientific merit.
m17	J Cordina, Cordina Chickens	C. Please refer to 'additional comments and suggestions' [in our submission].
m66, m67, m81	Ingham's, ATF	C, with adjustments as listed in [our] submission[s].



m45	FEC	Option C focuses on proper husbandry and mandating guidelines around hen welfare. This option provides a balanced approach to focusing on the welfare of the birds, and also meeting community expectations that in any of the production systems the bird's welfare is the main priority. There are a lot of different arguments regarding hen welfare. Displaying natural tendencies but being at a higher risk of disease, feather pecking and cannibalism in comparison to a caged system that provides the lowest mortality but is offset by hens losing the ability to display some natural tendencies. Consumers are entitled to making their own choice as to what eggs they would like to buy. Natural market forces should be the best indicator of which production system methods Australian farmers should be investing in.
m92	Hon R Mazza MLC	Option C as it provides greatest net benefit to Australian community. It displays nationally agreed to S&G that are understood, able to be implemented and monitored at jurisdictional level. It gives clear direction to producers, provides confidence to community and can be used as a defence to a charge of cruelty or as a guide to the courts when deciding a cruelty matter.
m174	N Simpson	Option C
m180	Pure Food Eggs	Option C provides for the retention of cages, essential for the provision of affordable protein for the Australian community, provides financial surety for egg farmers and maintains the efficiency of cage egg production.
m82	Baiada	Option C, with suggested amendments, in combination with banning castration, pinioning and devoicing from Option [G] would provide greatest net benefits for poultry welfare. Australian community should also support scientifically endorsed minimum standards for poultry in consultation with industry.
m39a	AVPA	<p>The AVPA does not attempt to understand community expectations or represent the views of the broader community. The AVPA recognises divergent opinions within its membership with respect to the options presented. All members' opinions are considered valid and based on knowledge and expertise. Therefore, a consensus cannot be reached in order to provide a definitive answer to this question.</p> <p>Option C will ensure that the welfare of all species of poultry is protected in a nationally consistent manner and this option is generally supported by members either as a stand-alone option, or in combination with other options. For specific details on support for other options (principally Options D and F in combination with Option C), please refer to the relevant sections.</p> <p>Option E is generally not supported by the AVPA subcommittee who formulated this submission and is considered to not be well supported by the wider membership.</p> <p>The components of Option G that will see banning of castration and devoicing of commercial poultry is also supported.</p>

m64, m98, m70	ACMF, Bill Williams, Turi Foods	C and G. Option C preferred assuming changes suggested [in our submissions] are made in combination with Option G provides greatest benefit to the Australian community.
m196	T Crowley	C and G.
m157, m177, m161, m86b	J Sanderson; C Dolling; J Johnson; K Chaplin	Option C – in combination with D, E, F, G.
m35	Ag and Food WA	D, E and F. <u>[Drafting group to refer to submission's Attachment 1.]</u>
m203	C Parker et al	Options D, E, F and G. These would put Australia in line with EU and British standards and would better reflect the majority of community values.
m107	S Loughnane	Options D and G, together, provide the most sound steps forward towards proper animal welfare in Australia's poultry farms. Banning cages outright, and the subsequent barbaric practices designed to address problems created by life in cages, creates space for animals to live with a higher measure of peace. They will permitted space to exhibit their natural behaviours, to socialize without undue pressures of competition and self-preservation, to bathe and clean themselves, to feel the sunlight and air and to avoid diseases such as osteoporosis caused by being caged. It's the way forward. I think we all know this. We just need to stop abiding by industry pressure to cut corners and costs and listen to the type of nation we want to be, and what we want to stand for. Options D and G. Let's ban the cage.
m11	AWLQ	Options D, E and G.
m156	C Keerqin	F.
m63	WAP	Modified Standards (see submission) and a combination of options, though we don't necessarily agree that all costs projections are accurate. <u>[Drafting group to examine technical information provided within the submission]</u> .
m38	AFSA	[Summarised. <u>See full submission</u> ] In a Facebook poll by AFSA, asking 'which option ... (out of the RIS), 57.1% opted for '10-year phase out of battery (cage) systems' and 42.9% opted for 'None of the above options'. Recommend a phase-out of battery systems in the next 3-5 years [see Section 4 – Housing]. Recommend that the current practice of rearing poultry outdoors on pasture for egg and meat

		production be considered with the updated or new Regulatory Impact Statement and added as a supporting paper to reflect the absent data on Australian poultry farms.
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## RIS Responses - Question 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?

Code	Submitter	Submission
m104	N Morgan	We need to consider the bigger impact; if we get rid of caged eggs in Australia we will not have enough eggs and will have to import them from elsewhere, i.e. Asia, where the welfare is much worse. The issue is that the public don't know the facts about cages; there is too much publicity promoting free range which is actually a bad system.
m177	J Johnson	Reducing the stocking density by 10kg/m <sup>2</sup> poses a reduction of shed space by 25% except in areas where RSPCA's is 34kg/m <sup>2</sup> – however that is an accreditation scheme separate from the National Standards. That means we need 25% more shedding to house the same number of birds under current market requirements. A 16 shed farm now becomes a 20 shed farm just to maintain the 'status quo' of chicken meat consumption. Managing a 20 shed farm is vastly different to a 16 shed farm – more alarms, more repairs and maintenance, and more walking etc. That 20 shed farm could now be perceived as a 'factory farm' simply by its size. Integrators will need to get bigger farms to adjust for economies of scale. Local councils and State Planning will need to be aware that the 'footprint' will grow by 25%. They will need to accept that more truck movements will be required because there is more gas, more bedding, litter removal than there was for the increased stocking density with fewer sheds.
m105	P Bell	Essentially any change will have an impact on costs – some minor and some major. The key point is how to fund these changes. It is easy to put forward ideas and many of the proponents do not provide a mechanism for providing the capital.
m42	Cheralyn Simpson	It is evident that caged farming system's biosecurity is far superior to that of any other system. Caged systems have significantly reduced the threat of avian influenza. If cages were to be phased out, there would be a consumer demand for more free range farms. This increases the risk of avian influenza. Humans can contract the deadly disease and there have been cases of avian influenza being spread human to human. Human welfare is just as important as poultry and this threat should not be ignored.
m159	Clairly Simpson	Option D would be a devastating outcome for existing cage egg producers. I am concerned to retain a choice whether I purchase cage produced eggs or eggs from an alternative system. I see the cage eggs as cleaner and less likely to be contaminated. Also, produced at a lesser cost enabling reduced prices to be passed onto consumers.

m174	N Simpson	Further consideration be given to human welfare issues, some of which have been mentioned in the RIS. Avian influenza. Costs being acknowledged to producers regardless of options other than A. No compensation suggested for egg producers who may be required to spend substantial money relative to these options. Continual scrutiny of egg production systems giving no stability for egg farmers' future livelihoods. Innuendo that furnished cage systems may not be acceptable in future reviews.
m11	AWLQ	See 'other [comments and suggestions in] this response. As an animal ethicist, I would be happy to meet with the members of the review process to assist with an ethical decision-making process.
m161	J Sanderson	EU research paper from 2000 into layer systems, RSPCA paper produced recently. I suggest you employ a policy officer to find this.
m39a	AVPA	[The AVPA have made an extensive response to this question, summarised below. <u>Drafting group to review</u> ]. There are significant flaws in the RIS and lack of definitions, which are likely to affect its meaningfulness and interpretation. The RIS could be challenged as deficient in its overall assessment of the risks and how the level of risk is assessed. It is unsafe to rely on industry data without seeking independent data. Mortality forecasted in the RIS could be lower when optimal beak trimming is used. Flock size would impact mortality data, as well as other factors. Inconsistency between number of egg farms in the RIS and ABS data for farm businesses. Laying rates in the RIS are questionable. Land shortage is a problem facing industry in general, not just free range. The RIS does not appear to allow for any compensatory changes to egg price as a result of shortage of eggs, which may occur if beak trimming or phasing out of cages affects the liveability of hens. Induced moulting, for a number of factors, is more often practiced in caged layers compared to free range and barn birds. Moving towards non-caged systems and the emergence of new strains of laying hens with longer production cycles should see induced moulting become a redundant practice. Costing of some options contains errors.
m68	ACGC	ACGC support the work of ACMF in undertaking detailed analyses of the literature surrounding the effects (or lack thereof) in the areas of stocking density and light intensity.
m63	WAP	(and question 18) Yes, See our [full] submission for additional evidence and references. <u>[Drafting group to examine technical information provided within the submission]</u> .

## RIS Response - Question 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?

Code	Submitter	Submission
m161, m17, m39a, m98, m45, m70.	J Sanderson; AVPA; Bill Williams; FEC; J Cordina, Cordina Chickens, Turi Foods	[These respondents ticked no with further comment.]
m105	P Bell	No. The Options outlined (except for A & B) would likely have a similar impact on small and large businesses. Circumstances differ between operators but in principle there will be a requirement for capital, the quantum is the difference.
m107	S Loughnane	No. I think if guidelines are consistent and abided by all, there should be no discrepancy in big to small businesses.
m11	AWLQ	No/Yes. Small business should already have greater compliance with smaller production systems. Small free range farmers should benefit from Options D, E and G if they are already providing for the needs of birds to be in smaller groups with more space and support for better welfare.
m68	ACGC	No/Yes. As detailed earlier, contract farmers are bound by their contractual arrangements with processors. If processors are forced to introduce cost prohibitive stocking densities, they may shrink their operations to fewer areas of Australia, meaning the loss of livelihood for farmers. If costs of implementation are passed through to farmers, smaller farmers without the means to grow economies of scale will be forced out of business as they will be unable to maintain profitability. Upgrading of lighting may also be cost-prohibitive for smaller farms, and some older, smaller farms may not be able to comply with litter standards as currently written therefore we propose a change (detailed in 'additional comments and suggestions' [in our submission]).

m104	N Morgan	Yes. Small companies will not be able to meet the high costs incurred by most of the options.
m156	C Keerqin	Yes. Change to the rearing condition from caged layer system to cage-free layer system will impose unexpected challenge to the industries with smaller scales.
m177	J Johnson	Yes. Depends on the definition of small business. If it's by numbers of employees then no – no issue. However, if the question is defining small business as amount of growing space small, medium, large, then yes it'll have an impact I'm sure because the bigger the better in economies of scale.
m203	C Parker et al	Yes. The standards as currently proposed – particularly the definition of “free range” disadvantage small niche producers seeking to provide a high quality, high ethics, outdoors based product. Preventing outdoors-based free range egg production would imperil a large range of niche small businesses that supply to high quality restaurants and high value consumers and would imperil Australia's reputation for excellence in gourmet and ethical produce at the high value end of the market.
m22, m33	EFA; SQA	Yes. Wholesale regulation applied uniformly to a sector is likely to disadvantage smaller producers more significantly than others. We note that this is particularly the case with Options D-G. In particular, Option F would similarly impact on small businesses. For small egg farms to have the confidence to invest in such costly infrastructure as furnished cages, the industry would have to be stable enough to ensure their viability and compensation from government would help remove the risk of bankruptcy. Neither of those factors are currently in play and therefore, the cost of implementation has a large likelihood of pushing smaller farms out of the market.
m56b	Name withheld by request	Any standard that stops the progress we now have will have a terrible effect on business, small and large. Best practice is not formulated by emotive arguments proposed by the likes of RSPCA. Best practice simply cannot occur with restrictive codes of practice reducing choices regarding responses to welfare issues. Best practices cannot occur when groups such as the RSPCA propose and enforce and regulate their own flawed standards and are acting immorally by being regulator and business at the same time.
m92	Hon R Mazza MLC	Yes. Option D will have detrimental effect on industry, followed by Options F and G.
M174	N Simpson	Yes. Option D will have huge impact for all cage egg producers, regardless of size. Substantial cost analysis has been included with RIS report however does not provide suggestions as to how these costs will be met. The need to have large flock sizes to achieve current production levels – also no suggestions for financial compensation
m42	Cheralyn Simpson	No/Yes. All caged operating farms will be severely impacted if option D comes into effect. I would expect most small commercial caged farms to go out of business. This will have a devastating effect on their families, employees and of course the flow on to contractors. Without financial assistance from the government, options other than A will financially impact farmers negatively.

m196	T Crowley	Yes. Very disproportionate impact will be made to all egg producers operating a cage system no matter what size business. The RIS does not tell us how impacted business will be compensated or expected to fund costs. Particular problems with Option D.
m180	Pure Food Eggs	Yes. Option C provides for the same outcomes for all types of businesses and should lead to better welfare outcomes across the layer industry. Any option which provides for the banning of conventional cages will have a disproportionate impact on any cage farm, large or small, when compared to free range or non-cage only farms
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.		
m104	N Morgan	Yes. The small free range companies will have to expand if we get rid of cages to try to help meet the demand for eggs.
m11	AWLQ	No. I would assume larger enterprises with heavy investment in large scale cage systems and sheds will be most affected.
m156	C Keerqin	Transition of the rearing method aimed to improve the welfare status of the animals should be carefully planned to minimise ... stress to animals as well as the business owners. A better solution is considered to be scientifically justified on the benefit of both the animals and the producers.
m105	P Bell	<p>The outlined options (except for A &amp; B) would have varying impacts on small and large businesses depending on their particular circumstances relating to production systems, shed types, size of property. In general the impact of the changes outlined in the Options C-G would have a similar proportionate effect regardless of the size of the business.</p> <p>Option C: One of the impacts of changing to the Standards &amp; Guidelines is the increased compliance responsibilities. It is likely this would affect small businesses more as they would be less likely to have administrative processes in place. The other changes under this option would reflect more whether the production facility was new or old. This would be the same impact for large and small. Option D: The phase out of cages would impact both large and small businesses. Option E: The decreased density would require large capital expenditure for capital expenditure both large and small businesses. Option F: The two components in this are: 1. The use of litter in slatted floor would affect both large and small; 2. The inclusion of litter, nests, perches, and scratch area in cages would impact severely on large and small businesses. Option G: The impact relates to beak trimming. This would affect large and small proportionately.</p>
m56b	Name withheld by request	B could impact positively by allowing innovation, whilst providing guidance.



m159	Clairly Simpson	Concern for all cage egg producers because of the financial impact should Option D be implemented.
m92	Hon R Mazza MLC	Option C will have detrimental and negative impact on small businesses because of the large capital investments that has been made to comply with current animal welfare requirements in keeping conventional cages. The industry is still paying off loans from the last upgrade of equipment which have a lifespan of 25 years. That means, industry still needs at least 15 years before its current conventional cage system is depreciated
m174	N Simpson	Option D will have devastating financial effect on small businesses operating a cage system.
m180	Pure Food Eggs	Small businesses are generally free range, so any option which doesn't involve the phasing out of expensive infrastructure is going to have a lesser impact

# Appendix 3 –Comments on Specific Standards and Guidelines<sup>4</sup>

## Standards and Guidelines 1 Responsibilities

Key issues:

- Definition for ‘reasonable’
- Definition for ‘competence’ and reference to training standards

Section A1 Responsibilities – General Comments			
Code	Submitter	Submission	Recommendation
m29b, m115a	RSPCA	SA1.x All new staff responsible for poultry welfare must be appropriately inducted and trained. Documentary evidence of staff training and/or competence must be maintained. [This] new standard should be included.	Consider inclusion as either a Standard or incorporation into GA1.4.
m63	WAP	WAP 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.	Drafting group to examine technical information provided within the submission.
m12	Annie’s Free Range	Some Standards are difficult to interpret, and therefore, value. Standards 1.1 and 1.2 are very broad and therefore difficult to cost. In fact, we would like to see these standards removed.	For consideration.

<sup>4</sup> If a Standard or Guideline does not appear in the tables it reflects no suggested change or comment received.

## Standard SA1.1

m10	ADO	The ADO submits that the term ‘reasonable’ must incorporate more than merely ‘accepted industry practices’. The current definition contradicts the principles of continuous improvement and of mandating standards that meet mainstream community expectations, on which the poultry standards and guidelines are and should be based.	Include the definition of reasonable in the Glossary.
m16, m194	C de Fraga, J Sanderson	‘Reasonable’ is not defined. Can be interpreted differently by different individuals and has the potential to detrimentally affect the welfare of birds if loosely interpreted. Makes the standard poor in terms of regulatability.	
m100	L Hoiles	Suggestion to change wording from ‘reasonable’ to ‘reasonable and humane’.	For consideration.
m83, m50, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m173	Multiple public submissions	The term ‘reasonable’ must be replaced by ‘effective’ action as the former term is open to interpretation. A person must take effective actions to ensure the welfare of poultry under their care.	
m175	E Ellis	General standard SA1.1 lacks specificity and thus does little to aid animal welfare while maintaining uncertainty. Some of the specific standards refer to a ‘person in charge’ which may aid accountability. Note, however, that the meaning of this term is one of very few provisions in animal welfare/cruelty legislation to be litigated.	
m29b, m115a	RSPCA	<i>A person must take reasonable actions to ensure the welfare of poultry under their care <b>including but not limited to the prevention of hypothermia, heat stress, dehydration, starvation, exhaustion, injury, pain, or disease.</b></i>	Consider including injury, pain, or disease as arguably covers all of the conditions.

		The RSPCA recommends that the above bolded wording be included in the standard.	
m206	Darwalla	We agree with this statement.	No action required.
m65	Animals Aust	Acceptable	
Standard SA1.2			
m83, m50, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m173	Multiple public submissions	Competency must be defined and quantified at a national level by way of a nationally accredited scheme to have any meaning. This standard must be rewritten to include the relevant industry training course/s and accreditation scheme/s.  A person involved in any part of poultry production must have recognised qualifications through a nationally accredited scheme.	For consideration
m144	Dr P Groves	This section should encourage the development of appropriate courses by tertiary education providers to help create means for people to attain competencies in the required fields.	
m65	Animals Aust	Acceptable.	No action required.
Guideline GA1.1			
m10	ADO	The draft poultry standards and guidelines suggest responsibility for poultry management should include ‘obtaining knowledge of relevant animal welfare laws’. The ADO queries what ‘obtaining knowledge’ actually means. Animal welfare laws are extremely relevant to the issue of managing any livestock.  That the relevant guideline in GA1.1 requires persons responsible for poultry management to ‘understand’ or ‘know’ animal welfare laws, consistent with other guidelines in GA1.1.	Recommend changing ‘obtaining knowledge’ to ‘understand’ or ‘know’.

m100	L Hoiles	<p>Suggestion to amend ‘<i>obtaining knowledge of relevant animal laws</i>’ to ‘<i>obtaining, <b>demonstrating and publically displaying</b> knowledge of relevant animal welfare laws</i>’.</p> <p>Suggestion to change ‘<i>killing poultry by appropriate methods</i>’ to ‘<i>killing poultry <b>only through use of best-practice, most humane</b> methods</i>’</p>	For consideration
m194	J Sanderson	Having an acceptable quality and quantity of feed and water and taking action when animals are found to be weak or injured should be standards. This is a base level of competence that should be required to keep livestock of any kind	For consideration
m83, m50, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m173	Multiple public submissions	Raise GA1.1 to a Standard and incorporate it into SA1.2	For consideration
m103	N Kratzmann:	“ <i>Handling to minimise stress, and using facilities and other equipment appropriately</i> ”. A guideline is too weak to ensure correct handling. A standard for carrying hens by two legs and holding their breast is needed.	Refer to Section 9 - Handling
m65	Animals Aust	It is difficult to understand how [this] “Guidelines” can be “recommended practices” only, when failure to comply with these is incompatible with meeting the requirements of SA1.1 and SA1.2. It is also puzzling that <i>identifying distressed, weak, injured or diseased poultry, and taking appropriate action...</i> is a Guideline here but a Standard under Section 3 (see SA3.3).	For consideration
m147	Sentient	<p>“<i>Elements of responsibility for poultry management should include ... identifying distressed, weak, injured or diseased poultry, and taking appropriate action</i>”.</p> <p>Clarify what appropriate action is: immediate removal from the flock, immediate humane euthanasia, and/or immediate veterinary treatment.</p>	For consideration

## Guidelines GA1.2, GA1.3, GA1.4

m206	Darwalla	We believe the guidelines GA 1.2, 1.3 and 1.4 should be worded more strongly to incorporate more transparent and structured training of responsible persons.	Recommend inclusion of 'Owners, managers and stockpeople should recognised qualifications through a nationally accredited scheme.'
m194	J Sanderson	GA1.2, 1.3 and 1.4: These are standard requirements for ISO quality management systems that should be in place in any food production business however leaving them as guidelines to protect small "cottage industries" can be acceptable.	
m147	Sentient	GA1.2 What is considered appropriate? Will there be information provided on the basics that need to be included as a minimum requirement for the induction program?  GA1.4 The word "should" implies that it is not necessary to be maintained. If it is not necessary, then how is it known that employees are undergoing the appropriate training?	
m100	L Hoiles	Suggestion to alter phrase to include wording that explicitly states the responsibility of the owners and managers to ensure staff are aware of the welfare requirements of poultry and where possible to exceed those welfare requirements.	Consider strengthening GA1.2.
m167	Dr M Faruqi MLC	Upgrade GA1.2 and GA1.4 to a standard	For consideration.

# Standards and Guidelines A2 Feed and Water

## Key issues:

- Induced moulting – see also Section 9 for more information- on the basis that it compromises welfare
- Skip-a-day feeding for broiler breeders (and the definition of this practice)
- Upgrading Guidelines to Standards

Section A2 Food and Water – General Comments			
Code	Submitter	Submission	Recommendation
m29b, m115a	RSPCA	In an earlier draft the following guideline was included, but has now been deleted in the draft standards: GA2.4 Poultry that cannot access feed and water adequately should be removed daily and raised separately or killed humanely. In the earlier draft, the RSPCA recommended that the guideline was included as a standard rather than a guideline due to the fact it is relevant to all species in all types of production, and the ability to access feed and water is a basic need and is enforceable.	See Standard SA3.4. Also consider here in Section 2 and suggested inclusion as a Standard.
m63	WAP	We recommend additional standards: SA2.X A person in charge must check for water supply, twice daily, in summer periods. SA2.X Forced moulting is not permitted.	DG to examine technical information provided within the submission.
m56a	Name withheld by request	Section 2 Feed and water, appears to have insufficient stipulation with regard to feed wastage attracting wild animals, such as rodents and birds, which are known are vectors of disease. Attracting disease like this to where the disease can be introduced into flocks is an existing and potential problem.	Consider inclusion of a guideline on managing feed wastage.

m56a	Name withheld by request	Outdoor feeding in large hoppers can be a problem in this regard and also in regard to the nutrient levels decreasing rapidly in hot environments along with the risks associated if feed is affected by humidity and moisture if stored or kept in such a way as to allow this to be more possible.	Consider inclusion of a guideline on feed storage.
m208	SA Ingham's Grower Group	Feed section should have started with the issue of feed cleanliness commencing with cartage, storage and protection against vermin and native animals / birds. Should some of the data for these items be kept for at least three batches for food and bio-security tracing. We already do this but it is not recognised by many and certainly not in the price we receive. Water guidelines need numbers. Quality issues need definition and recording again for food and bio-security reasons.	As above.
m29b, m115a	RSPCA	Standards must be introduced in Chapter 2 – Feed and water to ensure that poultry are not forced to moult.	See Standard SA2.1 and Section A9.
m29b, m115a	RSPCA	The following standard has been deleted from an earlier draft: SA2.8 A person in charge must ensure poultry have access to at least two drinking points. The RSPCA recommends that the standard be included.	Suggest inclusion as a guideline, or inclusion into GA2.10.
m29b, m115a	RSPCA	The following standard has been deleted from an earlier draft: GA2.11 Feed and watering facilities should be well spaced throughout the housing area. We recommend it be included to facilitate access to feed and water.	
m29b, m115a	RSPCA	The following guideline has been deleted from an earlier draft: GA2.13 Water should be available continuously, except where water is withheld prior to water vaccination or medication. We recommended that, as a basic need, the guideline be moved to a standard. Not only has this not occurred, but the guideline has been deleted. The RSPCA recommends that the deleted standard be re-introduced as a standard, with exceptions where necessary (i.e. during transport, prior to water vaccination). It has been raised that continuous access to water would be difficult to regulate, especially as there are some instances where birds (broiler breeders) are regularly denied access to water for long periods of time. Continuous access to water is fundamental to good animal welfare and husbandry, and is in the OIE Terrestrial Animal Health Code for Animal Welfare And Broiler Chicken Production Systems, Chapter 7.10, where it recommends that 'Water should be available continuously.' Water should be available continuously in these poultry S&G, with the appropriate exemptions,	Consider inclusion as a guideline or incorporating into Standard SA2.1 to provide more information on 'reasonable access' and 'adequate and appropriate', or Standard SA2.3.



		where continuous access to water may compromise welfare, or be required for medication etc.	
m206	Darwalla	There is no guiding principle on the quality or potability of drinking water. This is a significant welfare deficiency.	Suggest inclusion of a guideline for water quality.
m95	LIV	The LIV submits that the objective of these Standards should not only be to ensure that poultry have access to feed and water to minimize the risk to their welfare. The objective of the standards should also be to ensure that poultry are adequately fed and their health is maintained by positive practices that support their welfare.	For consideration.
Standard SA2.1			
m10	ADO	The ADO queries what ‘reasonable access’ to feed and water means. Does this also apply to ‘poultry less than 3 days old’? If so, is it reasonable for ‘poultry less than 3 days old’ not to have ‘access to drinking water at least once in each 24 hour period’ (SA2.3)?	Suggest defining ‘reasonable access’ and ‘appropriate’.
m100	L Hoiles	Suggestion to change wording from ‘ <i>reasonable</i> ’ to ‘ <i>reasonable and humane as demonstrated by animal welfare research</i> ’.	
m194	J Sanderson	‘ <i>Reasonable access to adequate and appropriate feed and water</i> ’ is poorly defined. All animals that imbibe water should have unrestricted access to clean, potable water at all times.	
m147	Sentient	What is considered ‘adequate’ for poultry? Is this increased when energy demands are higher, i.e. sick or laying poultry? Is there a minimum requirement for water quality? What is considered ‘reasonable’? Is there a minimum requirement for ml/kg/bird? Will this minimum requirement be altered according to the weather, i.e. hot weather when maintenance requirement for water increases?	
m83, m50, m172, m192, m154, m79, m85,	Multiple public submissions	Replace ‘reasonable’ with ‘effective’ as it is open to interpretation.	

m86a, m87, m145, m89b, m30, m173			
Standard SA2.2			
m206	Darwalla	The glossary definition of this practice is incorrect and very misleading: “Removing feed for 8-24 hour periods during the starter period which reduces early rapid growth and meat yield in broiler chickens.” This definition must be rewritten to accurately reflect the practice. It is a practice of feeding two days of rations on alternate days to meat breeder birds, not broiler chickens. The overall nutrient intake is not compromised during this procedure. Skip-a-day feeding must be included in the revised standards for broiler breeders as a significant welfare benefit, in order to control weight and avoid health issues from being overweight.	See Glossary and Section B3. Suggest amending glossary.
m39b	AVPA	‘Skip-a-day feeding’ is more appropriately referred to ‘alternate day feeding’ and the terminology should be changed. The glossary definition for ‘skip-a-day feeding’ is also incorrect, as this practice refers to meat breeder chickens and not broiler chickens. Two days ration are fed on alternate days so the net nutrient intake is the same as if they were fed daily.	
m29b, m115a	RSPCA	<p>SA2.2 <i>A person in charge must ensure poultry, other than hatched poultry <del>or where skip-a-day feeding is acceptable (for broiler breeders)</del> have access to food at least once in each 24 hour period.</i></p> <p>Skip-a-day feeding is very poor practice and poses welfare risks to poultry as they experience hunger and frustration, and may be accompanied by a lack of water and this can lead to adverse behaviours such as severe feather-pecking, leading to low lighting. As indicated with strikethrough font above, the RSPCA recommends that skip-a-day feeding is not allowed in the standards as it is stress-inducing and leads to poor welfare. Further, poultry should all have continuous access to water in their housing facilities.</p>	Evaluate evidence provided in the submissions.

m83, m50, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m173, m110, m117	Multiple public submissions	<p>The practice of Skip-a-day feeding must be banned due to the cruelty involved, as broiler breeders have been genetically selected by farmers to always be hungry — then denied the very thing they've been bred to do. [Relevant evidence from the FBWSR provided in support].</p> <p>In commercial housing, food and water are generally provided ad libitum and this must be extended to all poultry to ensure that extended hunger from restricted diets are avoided.</p>	
m65	Animals Aust	SA2.2 permits “skip a day” feed restrictions in broiler breeders, which we oppose (see further comments under B3 Meat and Laying Chicken Breeder).	
m34	Voiceless	Re induced moult/skip a day: In order to fulfil the primary Standard SA2.1, the proposed S&G must be amended to require that a person in charge must ensure poultry have constant access to sufficient and appropriate water, and have more frequent access to sufficient and appropriate feed (once within each 24 hour period being inadequate).	
m47	Sentient	Skip-a-day feeding should not be permissible. This equates to starvation and is inhumane. Broilers’ growth rates are such that they have a very high metabolic rate and high appetite. It is also not considered an acceptable industry practice for maintaining bird health or productivity.	
m100	L Hoiles	Suggestion to amend to ‘ <b>All</b> poultry to have access to food more than once in each 24 hour period’	No action in addition to that above.
m63	WAP	Recommend modification: SA2.2 <i>A person in charge must ensure poultry have access to food at least once in each 24 hour period</i> (see evidence provided in the submission).	SuggesteExamining technical information provided within the submission.
m200	S Koh	“Access to food at least once in each 24 hour period” does not specify duration – 5 seconds of feeding once a day would meet this requirement. Should be more specific.	Consider inclusion of an adequate duration.

m144	Dr P Groves	I note that skip-a-day feeding is recognized as an essential tool in some circumstances in poultry (breeder) rearing and that this is allowed to continue under the S&Gs.	For consideration.
Standard SA2.3			
m10	ADO	This standard excludes birds less than 3 days old from the standard requiring access to drinking water at least once in each 24 hour period. Will this exemption make it difficult for persons in charge to meet GA2.2 ( <i>'The interval of time from hatching to first feed and drink should be as short as possible'</i> )?	Suggest reviewing evidence in the submissions as to whether the exemptions in SA2.2 and SA2.3, and Standard SA2.4 and Guideline GA2.2 adequately meet the welfare needs of hatchlings, and then make the relationship between them clearer.
m200	S Koh	Same as SA2.2 in regards to water. Additionally, this paragraph suggests that chicks < 3 days old do not require access to drinking water at least one a day, and chicks do not require any water for the first 3 days of their life. This is ridiculous.	
m83, m50, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m173	Multiple public submissions	Proposed SA2.3 <i>A person in charge must ensure that <b>all poultry</b> have access to drinking water <b>ad libitum</b>.</i> The FBWSR supports ad libitum water provision for poultry including newly hatched poultry for example “immediate access to food and water at hatch ...can all help limit first-week mortality.”  The FBWSR also found that ad libitum provision of water is routine for layer hens “clean water is also generally available ad libitum in a manner that satisfies thirst.” and for Ducks “In commercial housing, food and water are generally provided ad libitum.”, and this must be extended to all poultry as it is important that water access is not too restricted as water consumption is an important means of automatically monitoring flock health. “Sufficient drinkers should be supplied to enable all broilers, even those with limited mobility, to access water at all times, without competition”	
m65	Animals Aus	SA2.3 permits water restriction. All poultry should have ad lib. access to water and the associated environmental problems dealt with by better housing management.	
m100	L Hoiles	Suggestion to amend to ' <b>All poultry</b> '	
			Suggest reviewing evidence in the submissions (including the RSPCA) as to whether SA2.3 adequately meets the welfare needs of poultry, specifically whether once in a 24 hour period is sufficient.

m56b	Name withheld by request	This stipulation appears extraordinarily insufficient. Suitable drinking water should be continually available to poultry, unless a medical treatment is required. If a layer had only access once in 24 hours on a 40 degree day on a bare bones range, that layer is dead.	
Standard SA2.4			
m100	L Hoiles	Suggestion to amend hours to within 24 hours	As per SA2.3.
Standard SA2.5			
m10	ADO	Recommendation: that the word 'undue' be removed from SA2.5. The meaning of the word 'undue' is unclear and creates uncertainty. It is reasonable to expect that no farmed animal should obtain an injury merely by trying to get to food or water.	Suggest removing 'undue'.
Standard SA2.6			
m194	J Sanderson	The lack of grammatical structure for this standard makes it open to interpretation. This is poor form for a standard that needs to be uniformly implemented around the country. i.e. <i>'With the exception of emus and ostriches, a person in charge must ensure poultry over 4 days old are not deprived of feed for more than 12 hours prior to depopulation'</i> is more clear as we know the time period applies to all poultry and not just ostriches under 4 days old and general fowl	Suggest rewording the standard. GA2.15 states that water should be available until the start of pick-up, and suggest including water until at least 12 hours prior in the standard.
m29b, m115a	RSPCA	The above standard has been changed from what was in an earlier draft: <i>'A person in charge must ensure poultry over four days old have reasonable access to food within the 12 hours prior to depopulation or pick up.'</i> This standard should specify that poultry must also have access to water in this time period. Also there is no evidence that emus and ostriches should be deprived of feed for over 12 hours prior to depopulation or pick-up and this exemption should be removed from the standard.	Review evidence in the submissions re emus and ostriches.

m206	Darwalla	SA2.6 is in contravention with the guidelines for acceptable feed withdrawal times as stipulated by SafeFood Queensland for production of wholesome food.	Examine guidelines for SafeFood Qld.
Standard SA2.7			
m10	ADO	The effect of this standard is that <i>'all poultry have access to feed and water'</i> (p16). Does this also apply to poultry less than 3 days old (as dealt with in SA2.3)?	As with Standard 2.3, recommend clarifying exemptions.
m39b	AVPA	This standard contradicts SA2.2.	
m95	LIV	Draft Standard SA2.7 will also likely reduce the risk of infectious disease, however it may be difficult to ensure compliance.	For consideration.
m147	Sentient	Daily is insufficient in warmer weather. Is there a cut-off (temperature-wise) that checking needs to be twice daily?	For consideration.
Guideline GA2.1			
m194	J Sanderson	This should be a standard	For consideration.
m47	Sentient	'Minimise' is far too subjective and is prone to abuse. Either change to 'prevent' or better define 'minimise'	For consideration.
Guideline GA2.2			
m194	J Sanderson	This should be a standard and absolute limits put in place (i.e. number of hours for each class of poultry)	Consider including in species specific sections.
m208	SA Ingham's Grower Group	Needs numbers.	

m147	Sentient	What is a reasonable time frame?	For consideration.
Guideline GA2.3			
m194	J Sanderson	This should be a standard	For consideration.
m208	SA Ingham's Grower Group	Needs numbers	For consideration.
Guideline GA2.4			
m100	L Hoiles	Suggestion to remove the word <i>managed</i>	Consider the removal of the word 'managed'.
m95	LIV	The LIV submits that draft Guideline GA2.4 should be included as a Standard rather than as a Guideline. Spoilt feed, toxic plants and harmful substances may have a severely detrimental effect on birds, including causing infectious disease.	For consideration.
Guideline GA2.5			
m83, m50, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30,	Multiple public submissions	Upgrade to a Standard.	For consideration.

m173, m194			
m208	SA Ingham’s Grower Group	GA2.5 is vague.	Suggest a guideline or definition for ‘regularly’.
m147	Sentient	The regularity of this needs to be defined.	
Guideline GA2.6			
m206	Darwalla	How will this be evaluated? Poultry nutrition is a specialised profession and assessment for suitability and safety can only be done by suitably trained persons, who have knowledge of poultry health and wellbeing.	Suggest being more specific within this guideline as to how/who should assess feed.
m39b	AVPA	Suggest that add ‘ <i>commercial feed</i> ’ and clarify who should assess – i.e. a qualified and experienced poultry nutritionist’ to the end of this guideline.	
Guideline GA2.7			
m100	L Hoiles	Suggestion to remove any reference to moulting, which is a cruel and unnecessary process, and ALL poultry should be entitled to graduated changes in diet.	Consider the evidence provided in the submissions about induced moulting, and whether all dietary changes should be introduced over an appropriate time.
m29b, m115a	RSPCA	The above standard has been changed from: <i>GA2.8 Major changes in diet should be introduced over an appropriate length of time and the effects on birds be closely monitored.</i> It is unacceptable to include reference to induced moulting. Moulting should not be induced for welfare reasons and the prevention of basic needs of access to adequate and appropriate feed and water. Further, even if induced moulting is performed, major changes in diet should certainly be introduced over an appropriate length of time and be closely monitored at all times.	
m147	Sentient	Induced moulting should be banned because it denies birds access to food or water for significant periods of time in order to extend the laying cycle, yet birds require access to food at least every 12 hours and preferably ad libitum. In terms of other changes of diet,	



		what length of time is considered ‘appropriate’? And how ‘sudden’ is too sudden regarding feed introduction and gastrointestinal symptoms?	
m63	WAP	[Summarised] WAP is opposed to forced moulting. Withholding food (or manipulating light) could contravene the first basic standard of this section.	Examine technical information provided within the submission.
Guideline GA2.8			
m39b	AVPA	This guideline oversimplifies the complex issue of feather pecking when read in isolation. It would be better positioned with GA3.17.	For consideration.
m63	WAP	[Summarised] Suitable substrate and enrichment should be added to prevent or reduce abnormal behaviours associated with deprived foraging. See proposed standards SA4.X and SA7. This recommended change would also assist risk reduction and compliance with Standard AS3.1 in relation to prevention of injury (see submission for more information).	Examine technical information provided within the submission.
Guideline GA2.10			
m83, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m173	Multiple public submissions	Upgrade to Standard.	For consideration.

## Guideline GA2.11

m83, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m173	Multiple public submissions	Upgrade to Standard.	For consideration.
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## Guideline GA2.12

m194	J Sanderson	This should be a standard	For consideration.
m50, m83, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m173	Multiple public submissions	Amend and upgrade to Standard- <i>‘Water within drinker lines must be flushed daily and monitored.’</i>	
m39b	AVPA	Clarification of monitoring is required – hygiene, potability?	Recommend clarifying the purpose of the monitoring.

## Guideline GA2.13

m95	LIV	The LIV submits that draft Guideline GA2.13 should be included as a Standard rather than a Guideline to ensure compliance and to protect birds from disease.	For consideration.
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## Guideline GA2.15

m83, m172, m192, m154, m79, m85, m86a, m87, m145, m89b, m30, m194, m173	Multiple public submissions	Upgrade to Standard.	For consideration.
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# Standards and Guidelines A3 Risk Management of Extreme Weather, Natural Disasters, Disease, Injury, and Predation

Key issues:

- Mandating emergency procedures
- Clarification of inspections and other required actions
- Beak trimming to prevent feather pecking

## Section A3 Risk management – general comments

Code	Submitter	Submission	Recommendation
m206	Darwalla	There is no comment supporting the use of appropriate veterinary therapeutics to treat disease.	Suggest inclusion in GA 3.12
m34	Voiceless	Mandate the provision of emergency procedures. It is important that the proposed S&G make mandatory provisions to prepare for emergency situations. Specifically, Voiceless recommends converting Guideline GA4.4 to a Standard, so that maintenance programmes must be in place for all equipment where any malfunction or failure would jeopardise poultry welfare; converting Guidelines GA3.1 and GA3.2 to Standards to require contingency planning; converting Guideline GA3.5 to a Standard so that adequate firefighting equipment must always be available and maintained for indoor housing systems; and, introducing a Standard in Chapter 3 to require sufficient exits are accessible to facilitate the evacuation of birds in an emergency (a basic protection stipulated in the MCOP, but inexplicably omitted from the proposed S&G). This will go some way towards addressing the shocking incidences where poultry have suffered from natural disasters and fires (such as the shed fire on Marburg Poultry Farm in Queensland that killed 30,000	See individual guidelines for comments.  For consideration including a guideline regarding the number of accessible exits

		chickens in 2016 or the bushfire at Hamley Bridge Farm in South Australia that killed 51,000 chickens, 500 pigs and 950 sheep in 2015).	
m29b, m115a	RSPCA	<p>The RSPCA recommends the following standards be included</p> <p>SA3.[x] A person in charge must ensure poultry are not handled when showing signs of heat stress (e.g. panting, wings outstretched) unless it is deemed necessary to ensure their welfare.</p> <p>SA3.[x] Poultry with a propensity to feather-peck (layer hens, turkeys, meat chicken breeders, ducks) must be monitored daily for signs of injurious pecking, and appropriate management carried out.</p> <p>SA3.[x] Poultry must be vaccinated to protect against likely infectious diseases if there is a significant risk to the welfare of poultry.</p> <p>SA3.[x] Species particularly prone to leg problems (broilers, turkeys) must be monitored daily for incidence of lameness.</p>	For consideration.
m1	G Jankowski	I propose an addition to Part 3: Risk management of extreme weather, natural disasters, disease, injury and predation. New SA3.7 A person in charge should, on a daily basis, record all mortalities and causes.	For consideration.
m208	SA Ingham's Grower Group	Risk management strategies aimed at dampening the impacts of weather extremes on chicken comfort levels needs more detail and numbers. Disease, disease vectors and pest management all need more detail.	For consideration.
m44	EPANSW	These guidelines have a commercial focus and are not applicable to exhibition poultry fanciers.	For consideration.
m65	Animals Aust	The community expects farmers to exercise a basic duty of care. It is not possible to comply with SA3.1 without complying with GA3.14 to GA3.19. It is unacceptable these Guidelines are not Standards given the huge numbers of birds being farmed and the potential for disease, injury, and predation.	For consideration.

## Standard SA3.1

m100	L Hoiles	Suggestion to amend ‘reasonable’ to <i>‘All reasonable and humane actions with the welfare of the bird at the forefront of such actions’</i>	For consideration.
m200	S Koh	This relates to protection from threats. There are no standards requiring action in the event of a threat – e.g. rescue or release of poultry to prevent them being burnt alive in a fire. Livestock dying in fires because they are trapped is a frequent occurrence, and is a horrible way to die. Owners must be required to rescue or allow poultry to escape in the event of an emergency. Contingency planning as guidelines is not sufficient.	Suggest including wording that states that taking action during an extreme event is part of ‘protection’
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Replace “reasonable” as it is open to interpretation.  Proposed SA3.1 <i>A person in charge must take <b>effective</b> actions to protect poultry from threats, including extremes of weather, fires, floods, disease, injury and predation.</i>	As mentioned previously, define reasonable
m144	Dr P Groves	Requires reasonable actions to protect poultry against ‘predation’. This subsequently mentioned under SA3.5 in relation to the provision of shelter that may minimize predation. While predation is a minor cause of bird loss under Australian free range operations, it does occur. Protection against ground dwelling predators is reasonably well accomplished by good fencing, which is impenetrable by burrowing underneath or climbing across. However, this approach is not protection against bird predators (eagles, hawks and particularly, crows). In this context ‘reasonable’ protection against bird predators needs a more precise definition.	
m65	Animals Aust	Acceptable.	No action required.

## Standard SA3.2

m10	ADO	This standard requires <i>‘the inspection of poultry daily, at a level appropriate to the management system’</i> . The ADO queries what this actually means, and whether it will ensure that individual animals are inspected (which should be the minimum standard).	Suggest inserting “and more frequently when risks are
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m103	N Kratzmann	Vague. This is an important standard. I believe there must be wording that ensures the risk is taken care of. It could be enlarged to include minimum number of inspections and these inspections must be recorded. A welfare check with clearly written actions to be taken must be used to ensure bird welfare.	present” into SA3.2. See also GA3.6 and GA3.7.
m29b, m115a	RSPCA	The RSPCA recommends the addition of the following bolded words to the below draft standard. SA3.2 <i>A person in charge must ensure the inspection of poultry <b>at least daily (and more frequently in hot weather)</b>, at a level appropriate to the management system and the risk to the welfare of poultry.</i>	
m83	B Van Elburg	Amend Standard: <i>A person in charge must ensure <b>that poultry are supervised 24hrs and their inspection carried out throughout the 24hrs</b>, at a level appropriate to the management system and the risk to the welfare of poultry. <b>There must be thorough inspection of every animal and follow a protocol that routinely mitigates risk of adverse welfare outcomes for each animal.</b></i>	
m39b	AVPA	Once daily is considered inadequate – ‘once daily’ should be replaced with ‘at least twice daily’.	Consider revising to twice daily inspections.
m73	AVA	Inspection must be at least twice daily to ensure appropriate welfare	
m65	Animals Aust	Acceptable.	No further action required.
Standard SA3.3			
m100	L Hoiles	Suggestion to remove ‘reasonable’ and replace with ‘as soon as possible’	Recommend being more specific about the action and timeliness required in SA3.3.
m29b, m115a	RSPCA	The RSPCA recommends the addition of the following bolded words to the below draft standard. SA3.3 <i>A person in charge must ensure appropriate <b>treatment or humane euthanasia</b> <del>action</del> for sick, injured or diseased poultry as soon as possible.</i>	
m39b	AVPA	The first reasonable opportunity should be clarified by specifying a timeframe for this to occur. This standard should also require that advice must be obtained from a veterinarian in the case of illness or disease.	

m50, m83, m173	L McKenna, B Van Elburg, M Chester	Replace ‘as soon as possible’ with ‘immediately’ to ensure that suffering is minimised.  <i>A person in charge must ensure <b>effective</b> actions for sick, injured or diseased poultry <b>immediately</b> upon identification and without delay.</i>	No further action required.
m73	AVA	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.	
m189	S Kay	SA3.3 <i>A person in charge must ensure appropriate action.</i> What does ‘appropriate action’ mean? The Guidelines provide this information so why not specify in the Standard?	
m44	EPANSW	Supported	
m65	Animals Aust	Acceptable	
Standard SA3.4			
m10	ADO	This standard requires that birds who ‘ <i>are unable to access feed and water are treated or killed as soon as possible</i> ’. This standard is very broad and therefore uncertain. Does it apply to birds who are some distance away from feed and water? Or who are too small to reach feed and water? The ADO submits that killing these animals for these reasons is unreasonable.	Recommend specifying that this applies to birds who are sick or injured.
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Replace ‘as soon as possible’ with ‘immediately’ to ensure that suffering is minimised. <i>A person must ensure poultry which are unable to access feed and water are treated or killed <b>immediately</b> upon identification.</i>	
m44	EPANSW	Supported although this standards needs a timeframe attached or a definition of “ <i>unable to access</i> ”	
m147	Sentient	There should be a requirement of maximum stocking densities to prevent this situation where some birds are unable to access food and water. Without such a requirement, it appears that industry considers high stocking densities and the profits they bring can justify the disposal of a minority of birds who cannot compete for the basic requirements of feed and water. Furthermore, it is unlikely that persons in charge will be able to identify these birds in intensive systems due to the sheer number of birds, who will therefore suffer a slow death due to dehydration.	For consideration.



m65	Animals Aust	Acceptable.	No action required
Standard SA3.5			
m200	S Koh	<i>‘Access to shelter from adverse weather’</i> is not sufficient to prevent against heat or cold stress, particularly in sheds which are not insulated. Equipment that can regulate temperatures, or provision of deep litter/bedding material, should be required	Consider inclusion of “appropriate” before shelter.
m206	Darwalla	SA3.5 is in contradiction with current free range requirements in that predation cannot be reasonably minimised in free range farming situations, unless netting or similar is allowed as a standard.	There are Guidelines within Section 5 about minimising predation (not preventing however).
m144	Peter Groves	Requires access to shelter from adverse weather. One issue that requires further consideration here is the application of this Standard to caravan-style free range layer facilities, which do not provide feed or water inside the structure. Under caravan-style facilities birds can access neither feed nor water unless they go outside into the prevailing conditions (whether this is pleasant weather, extreme heat, rain, high winds, cold or even snow).	For consideration.
m44	EPANSW	Supported.	No action required.
Standard SA3.6			
m44	EPANSW	Supported	No action required.
m65	Animals Aust	Acceptable	
Guideline GA3.1			
m34	Voiceless	Converting Guidelines GA3.1 to Standards to require contingency planning.	For consideration

### Guideline GA3.2

m83, m173, m50	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard- <i>Plans to minimise risks to poultry welfare must include:</i> <ul style="list-style-type: none"> <li>• <i>emergency contact details;</i></li> <li>• <i>electrical power or systems failure;</i></li> <li>• <i>breakdown or mechanical failure affecting feed, water, ventilation,</i></li> <li>• <i>adverse weather — specifically, conditions that predispose poultry to heat or cold stress;</i></li> <li>• <i>flood and fire;</i></li> <li>• <i>insufficient supply of feed or water;</i></li> <li>• <i>disease outbreak or injury;</i></li> <li>• <i>emergency killing and disposal;</i></li> <li>• <i>other issues specific to the enterprise or poultry being managed;</i></li> <li>• <b>alarm systems during power or systems failure including mechanical breakdown or failure;</b></li> <li>• <b>back-up generator power for feed, water, ventilation, heating, cooling, hatching systems.</b></li> </ul>	For consideration.
m34	Voiceless	Converting Guidelines GA3.2 to Standards to require contingency planning.	

### Guideline GA3.3

m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard- <i>Poultry handling <b>must not occur</b> during extremely hot weather.</i> [evidence from the FBWSR provided to support this recommendation]	For consideration with the technical evidence provided in the submission.
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### Guideline GA3.4

m83, m173	B Van Elburg, M Chester	Upgrade to Standard.	For consideration.
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### Guideline GA3.5

m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard- <i>Effective firefighting equipment must be available for <b>all housing systems</b></i>	Suggest upgrading to standard “firefighting equipment must be available and maintained for all indoor housing systems” with sprinklers and remote monitoring as guidelines.
m65	Animals Aust	It is unacceptable this Guideline is not a Standard given the huge numbers of birds in sheds and the potential for fire. The community expects farmers to exercise a basic duty of care.	
m10	ADO	The ADO submits that this should include automatic fire sprinkler systems and remote monitoring systems, for as long as it remains legal to keep poultry in intensive housing systems.  Recommendation: that automatic fire sprinkler systems and remote monitoring systems be included in the standards for section 3 as mandatory requirements for intensive indoor housing systems.	
m34	Voiceless	Convert Guideline GA3.5 to a Standard so that adequate firefighting equipment must always be available and maintained for indoor housing systems;	

### Guideline GA3.6

m103	N Kratzmann	This must be a standard, not a guideline. These inspections must be recorded at least three times per day.	For consideration. Note that “At least daily inspections, and more frequently when risks are present”, is recommended for SA3.2.
m194	J Sanderson	For large establishments (over 200 layers or 5000 broilers for instance) [this] should be standard.	
m83	B Van Elburg	Upgrade to Standard- <i>Inspections must be carried out <b>at least twice a day</b> during which temperature, light levels, availability of feed, feeding systems, water and all parts of the ventilation system are checked, and where problems are encountered, appropriate remedial action must be taken to protect the welfare of poultry.</i>	
m50, m173	L McKenna, M Chester	Upgrade to a Standard: <i>Sufficient inspections <b>each day</b> should be undertaken during which temperature, light levels, availability of feed, feeding systems, water and all parts of the ventilation</i>	

		<i>system are checked, and where problems are encountered, appropriate remedial action should be taken to protect the welfare of poultry.</i>	
m65	Animals Aust	It is unacceptable this Guideline is not a Standard given the huge numbers of birds being farmed and the potential for disaster if automated systems fail. The community expects farmers to exercise a basic duty of care.	
m167	Dr M Faruqi MLC	Upgrade to a Standard	
<b>Guideline GA3.7</b>			
m103, m83, m173	N Kratzmann,B Van Elburg, M Chester	Upgrade to Standard	For consideration.
m194	J Sanderson	For large establishments (over 200 layers or 5000 broilers for instance) [this] should be standard.	
m177	J Johnson	‘Documented’ – what, every time? Managers walk their sheds three or more times per day – is this clause requiring them to do this every visit to the shed, once per day?	Consider clarifying the nature of how the documentation should occur within the guideline.
<b>Guideline GA3.9</b>			
m83	B Van Elburg	Amend and upgrade to Standard- <i>All alarm systems, feed, water, ventilation, heating, cooling and hatching systems, firefighting equipment and emergency power supplies must be tested <b>daily</b> and test results documented.</i>	For consideration, noting GA3.5 which suggests fire-fighting equipment must be maintained.
m173, m167	M Chester, Dr M Faruqi MLC	Upgrade to a standard	For consideration.

m65	Animals Aust	It is unacceptable this Guideline is not a Standard given the huge numbers of birds in sheds and the potential for fire. The community expects farmers to exercise a basic duty of care.	
Guideline GA3.10			
m103	Noel Kratzmann	This must be a standard and the actions recorded and management oversight at least weekly to identify any issues that are continually being observed and temporarily rectified.	For consideration.
m83, m173	B Van Elburg, M Chester	Upgrade to Standard.	
Guideline GA 3.11			
m144	Dr P Groves	Covers biosecurity concerns and mentions aerosols as a pathogen transmission method that should be addressed. Apart from HEPA filtering of incoming air, preventing aerosol transmission of poultry pathogens seems an impossibility in a commercial or non-quarantine facility framework. The major poultry pathogens transmitted by this method (e.g. Marek’s Disease, Infectious Bronchitis, Infectious Laryngotracheitis) have proven impossible to exclude by biosecurity alone and must rely on vaccination to provide protection.	For consideration.
Guideline GA3.12			
m29b, m115a	RSPCA	The RSPCA recommends that [this] guideline become a standard. Veterinary preventative care and treatment should be mandatory. The birds should be under some overall veterinary control.	For consideration.
m65	Animals Aust	It is unacceptable this Guideline is not a Standard given the huge numbers of birds in sheds and the potential for disease. The community expects farmers to exercise a basic duty of care. It is not possible to comply with SA3.1 <i>A person in charge must take reasonable actions to protect poultry from threats, including ... disease, injury and predation...</i> without complying with GA3.12.	

m83, m173	B Van Elburg, M Chester	Upgrade to Standard.	
Guideline GA3.13			
m103	N Kratzmann	This must be a standard and include management oversight weekly of the records and this is documented.	For consideration.
m83, m173	B Van Elburg, M Chester	Upgrade to Standard.	
m65	Animals Aust	It is unacceptable this Guideline is not a Standard given the huge numbers of birds in sheds and the potential for high mortalities. The community expects farmers to exercise a basic duty of care [cites the FBWSR to support this recommendation].	
Guideline GA3.14			
m147	Sentient	At what point is the risk ‘significant’? We submit that preventative measures such as vaccinations should be mandatory, especially in intensive systems, where high stocking densities promote the amplification of infectious agents.	For consideration.
Guideline GA3.16			
m29b, m115a	RSPCA	<p>The RSPCA recommends the following dot point be revised, as feather damage and feather loss can occur anywhere on the body due to severe feather pecking. It most commonly occurs on the back, rump and tail regions in commercial conditions.</p> <p><i>GA3.16 Daily monitoring of poultry should occur to identify early signs of injurious pecking which may include:</i></p> <p><i>· feather damage or bare areas around the tail</i></p>	Suggest adopting the revision to include ‘the back’

		Be revised to: · <b><i>any feather damage or bare areas, particularly around the back and tail regions.</i></b>	
m83, m173	B Van Elburg, M Chester	Upgrade to Standard.	For consideration.
<b>Guideline GA3.17</b>			
m100	L Hoiles	Remove the allowance of beak trimming	Suggest examining technical information provided in the submissions (see also SA9.15).
m200	S Koh	Beak trimming should not be allowed. Owners should be required to use alternative management methods to manage aggression (humans are supposedly the smartest animal of the planet after all). Management methods should include the provision of environmental enrichment and complexity, facilities for birds to escape other birds, reduced stocking densities, and reducing stress and fearfulness (e.g. by reducing noise and disturbance).	
m10	ADO	<p>Given the extremely adverse animal welfare outcomes from feather pecking and cannibalism, the ADO submits that [this] guideline should recommend that action be taken to eradicate rather than manage feather pecking and cannibalism.</p> <p>This guideline recommends beak trimming as a management method for feather pecking and cannibalism. The ADO strongly opposes on animal welfare grounds the practice of beak trimming. The practice was banned in the ACT in 2014 [see submission for more detail]. The ADO submits that if beak trimming is cruel enough to be banned in one jurisdiction in Australia, then it should not be encouraged in a national guideline for poultry farming. This would also apply to trimming ducks' bills.</p> <p>Recommendations: that the reference to beak trimming in GA3.17 be removed, and that beak trimming instead be banned in the standards in section 3.</p>	
m34	Voiceless	Voiceless recommends introducing a Standard to prohibit beak and bill trimming, unless performed by an accredited operator in exceptional or therapeutic circumstances, when all other alternatives have been exhausted. To this end, beak and bill trimming should be removed from the proposed S&G as an acceptable management practice and, instead, a Standard should be inserted to the effect that all natural farm management practices must be implemented in order to reduce the incidence of feather-pecking, such as lowering stocking densities and providing adequate substrate	

		or litter (potentially converting elements of Guidelines GA3.17 to a Standard). This should also be reflected in species-specific chapters, such as by converting Guideline GB13.16 to a Standard, with the effect being that where large numbers of turkeys are pecking or cannibalising other birds, action should be taken by adjusting management practices and seeking veterinary advice.	
m147	Sentient	We oppose beak trimming. This is an invasive surgical procedure that would require anaesthesia and long-term pain relief. Beak trimming is not an acceptable strategy to prevent feather pecking and cannibalism. This problem should be addressed by genetic selection and the provision of foraging materials and other forms of environmental stimulation such as dust baths, perches and outdoor access. Reducing stocking density should be listed first, as high stocking densities are the primary cause of cannibalism in birds. Lower stocking densities allow birds to move away from pecking animals, and they also reduce stress in general. Strategies to reduce feather pecking should also include rearing and transfer to the layer farm, litter quality and use, diet, range quality and use, and flock health <a href="#">[see evidence provided in the submission]</a> .	
m83, m173, m50	B Van Elburg, M Chester, L McKenna	Amend and upgrade to Standard: <i>Feather pecking and cannibalism risk must be managed. Management methods, such as the below must be considered:</i> <ul style="list-style-type: none"> <li>• <del>Infrared beak trim at day old;</del></li> <li>• <del>reducing light intensity;</del></li> <li>• providing foraging materials;</li> <li>• enrichment;</li> <li>• modification of nutrition and feeding practices;</li> <li>• reducing stocking density;</li> <li>• selecting the appropriate genetic stock;</li> <li>• isolation of affected birds.</li> </ul> Procedures on poultry of infrared beak trimming and reducing light intensity to control aggression must be banned and alternatives like increasing enrichment and reducing stocking density must be used instead <a href="#">[provides evidence from the FBWSR to support the claim]</a> .	
m206	Darwalla	The wording should include the word “prevention” as well as the word management.	
m39b	AVPA	The words ‘ <b>and prevented</b> ’ should be inserted after <i>managed</i> to ensure that risk factors are considered. ‘ <b>Second hot blade beak trimming, with advice and from a veterinarian</b> ’ should be added to the list of management methods.	



m29b, m115a	RSPCA	<p>We recommend the below revision:</p> <p><i>Feather pecking and cannibalism risk should be managed. Management methods, such as the below may be considered: · isolation <b>and/or treatment</b> of affected birds.</i></p> <p>We also recommend the following: <b>Wounded birds should be treated, separated from the flock for recovery, or humanely euthanased. This decision must be made by a competent and experienced person.</b></p> <p>Injurious pecking can escalate extremely quickly and spread throughout a flock very quickly, and if there are birds which have visible wounds, this can escalate into cannibalism rapidly. These birds should therefore be separated from the flock and treated as soon as possible.</p>	
m56a	Name withheld by request	<p>[Summarised. See full submission for detail]. Given the beak trimming discussion paper’s lack of real world examples in which infrared trimming is unsuccessful on a grand scale, it is to be expected that hot blade trimming is not mentioned here as a possibility. Most commentators freely admit that there comes a time when the dependable method of hot blade trimming is the only solution.</p> <p>To not include hot blade trimming is a regressive step in terms of poultry welfare. IR trimming is an extraordinary expensive installation, and if performed incorrectly, creates a huge problem because the IR method allows such vast numbers to be processed and the time to notice abnormalities is passed before birds are sent to customers. Abnormalities can become apparent weeks and months after the trim. These customers have need of urgent re-trimming and this should be allowed if not encouraged if the welfare of the bird is a priority.</p> <p>Also, particularly free range farmers who have insisted that their birds be free from trimming are not infrequently in desperate need of a solution, the only possibility, that can be applied rapidly with as little stress to the flock as possible is hot blade trimming. To have no reliable backup plan is a poor welfare outcome, Hot blade trimming provides such a backup.</p> <p>Other options, particularity for Game birds are beak bits, bumpa bits, peepers and c clips, are these ok? All are methods applied to the bird’s beak to prevent injurious pecking.</p>	

### Guideline GA3.18

m194	J Sanderson	This guideline applies more to certain types of poultry (i.e. broiler chickens) and is a production issue.	For consideration.
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard. <i>Poultry <b>must</b> be monitored for incidence of lameness, and the cause of lameness investigated and treated <b>immediately upon identification</b>.</i>	
m147	Sentient	Change to 'must'. This should be a standard, not a guideline. Furthermore, the causes of lameness are often inherent to intensive production systems, such as the selective breeding of broilers for faster growth rates and high meat yield, which result limb disorders and lameness.	

### Guideline GA3.19

m206	Darwalla	GA3.19 implies that the welfare of predators could be compromised in order to protect the welfare of poultry. Should be reworded to recommend “avoidance programs” rather than “control programs”	Suggest adopting the RSPCA wording to ensure the welfare of predator species
m29b, m115a	RSPCA	RSPCA recommends the following addition: <i>Predator control programs should be implemented where predation is a significant risk <b>using the most humane methods available</b>.</i>	

# Standards and Guidelines A4 Facilities and Equipment

## Key issues:

- Ban/phasing out of cages, especially conventional cages
- Provision of perches and nests
- Removal of additional Standards and guidelines from earlier drafts

## Section 4 Facilities and Equipment - General Comments

Submission code	Submitter	Submission	Recommendation
m191	Animal Liberation ACT	<p>In this section there is no suggestion that current facilities and equipment be modified to achieve even the minimal standards mentioned here. Most housed poultry are in situations where they do not enjoy enough space to maintain a 'natural standing posture' or have support of 'forward facing toes' or be 'protected from excreta from birds perching above'.</p> <p>Animal Liberation ACT urges the government to insist on a vast improvement of the overall facilities and equipment standard and that the improvement consider the natural needs of the poultry. For example, no cages at all. More physical spaces for the poultry and an environment that allows them to participate in natural, inherent behaviours. By implementing facilities and equipment that take these needs into account real animal welfare is being addressed.</p>	For consideration.
m83	B Van Elburg	We demand an immediate phase out of caged production systems and removal of standards and guidelines related to cages [evidence for this suggestion provided from the FBWSR].	Examine technical information provided within the submission.
m155	Dr D Evans	Add a Standard to prohibit the use cages for any poultry.	
m110	C Davis	A standard should be included in 'Part A facilities and Equipment' to prohibit housing <b>any</b> birds in <b>any</b> cages.	

m29b, m115a	RSPCA	<p>The RSPCA urgently recommends that a standard be included in Part A – 4 Facilities and Equipment, to prohibit housing any birds in conventional cages, and a standard in Chapter B1 – Laying Chickens to ensure that battery cages for layer hens are phased out.</p> <p>SA4.x Housing birds in conventional cages is prohibited, with effect from (insert date). In addition, with effect from (insert date) no conventional cages may be built or brought into service for the first time.</p> <p>The addition of standards to every species-specific section to prohibit the use of conventional cages.</p>	Examine technical information provided within the submission.
m38	AFSA	Opt to phase out battery systems in the next 3 – 5 years and to phase out all cage systems in the next 10 years. This should be done using a strategy to transition the industry such as that used in Austria (where battery cages were prohibited in 2009), and supporting the long-term management of cage-free systems as done across the EU [ <a href="#">see supporting information provided within the submission</a> ].	
m29b, m115a	RSPCA	The RSPCA strongly recommends that there be a standard included which applies to all species that prohibits the housing of poultry in barren cages.	
m29b, m115a, m100, m100, m117, m114, m155	RSPCA, L Hoiles, Dr D Evans, G Walker, C David, J Kendall	RSPCA recommendation: The inclusion of a standard in Chapter 4 – Facilities and equipment to ensure adequate perch space is provided to all poultry with a motivation to perch.	See Guidelines GB1.14-16
m38	AFSA	We support the RSPCA's recommendation that a standard be included in chapter 4 – Facilities and equipment to ensure adequate perch space must be provided to all poultry with a motivation to perch. We add to this recommendation that this be a temporary Standard until the housing of poultry is phased out in the next 10 years, with a view to all poultry systems becoming free range.	
m50, m83	L McKenna, B Van Elburg	In reference to GA4.11-4.14, it is recommended that they be upgraded to Standards and reflect the findings of the FBWSR which identified a highly motivated need to perch exists amongst poultry and therefore must be provided for poultry	For consideration

m10	ADO	GA4.15–4.17 These guidelines suggest the use of nests. While it continues to be legal to farm birds in intensive conditions, the ADO submits that the use of nests should be mandatory for all intensively farmed birds. Recommendation: that the use of nests be removed from the guidelines and included in the standards in section 4 of the poultry standards and guidelines.	For consideration
m34	Voiceless	In addition, Voiceless notes the failure of the proposed S&G to address ventilation for nest boxes. A Standard should be included to reflect clause 7.2.5 of the MCOP, to ensure nest boxes are adequately ventilated and temperature protected.	For consideration
m29b, m115a, m155, m3, m94	RSPCA, Dr D Evans, G Rickuss, J Haviland & M Derby	RSPCA recommendation: A standard be introduced in Chapter 4 – facilities and equipment, to ensure that all species are provided with environmental enrichment appropriate to the species, with guidelines in species-specific chapters.	For consideration
m200	S Koh	These standards are grossly deficient. All poultry should be required to have access to an outdoor area, as sheds do not allow sufficient natural light to enter and artificial lighting is inadequate. All animals require natural light. At the very minimum, there should be a standard that requires sheds to have windows and allow a specified minimum level of natural light in.	For consideration
m208	SA Ingham's Grower Group	The section on Facilities and Equipment again lacks clarity against a farming system and also lacks defining numbers e.g. maximum chickens per feed pan or water point. Water nipples should be preferred over open water for bio-security and disease issues. Clean out and sanitation frequency of a most basic nature should also be stipulated.	For consideration
m29b, m115a	RSPCA	Multiple standards have been deleted from this section that the RSPCA disagrees with and recommends that they be added back in. These standards are:  SA4.9 A person in charge must ensure that useable areas and any area occupied by feeding and watering equipment and nest boxes, on one or more levels ensure that;  1) each level is easily accessible to the hens 2) headroom between the levels is at least 45 cm 3) all levels are accessible to stock workers to observe and reach birds which are sick or injured 4) feeding and watering facilities are distributed to provide equal and ready access to all hens; and 5) levels are sited so as not to foul birds below.	For consideration , referring to full submission; SA4.9 is now SB1.4, SA4.10 is now GA9.2

		SA4.10 A person in charge must ensure that poultry are managed at a stocking density that takes the following into account; 1) growth rate 2) competition for space 3) access to feeders and water 4) air temperature and quality 5) humidity 6) litter quality and 7) activity levels and 8) <b>management capabilities</b> . The [bold] underlined standard above was not in the previous standard but is another recommended addition.	
m29b, m115a	RSPCA	<p>The following was previously included in a draft but has been deleted for the consultation draft. This should not be cut. If anything, more guidelines should be added, to specify that adequate access to the outdoors should be provided, to allow easy access in and out of the shed and encourage access if birds are motivated to go outside.</p> <p>GA4.21 Where poultry have access to a pop hole each pop hole should be of sufficient size to allow the passage of more than one bird at any one time.</p>	For consideration, referring to full submission.
m29b, m115a	RSPCA	<p>RSPCA recommends the addition of the following standard from the current MCOP:</p> <p>SA4.2 Floors, other surfaces, fittings and equipment must be designed, constructed and maintained so as to minimise the risk of injury and disease, and to adequately support the birds.</p>	For consideration.
m10	ADO	The ADO submits that while it continues to be legal to keep birds in intensive housing, the minimum standard should be to allow a bird to express normal behaviour. The ADO notes that this is a fundamental aspect of the international husbandry standards known as the ‘five freedoms’, and is also referred to in the draft poultry standards and guidelines (page 12). The ADO also notes that the ‘five freedoms’ have come under criticism from animal welfare scientists, who have observed that ‘for animals to have good welfare they really need to be able to engage in rewarding behaviours’. For this reason, animal welfare strategies adopted in some jurisdictions in Australia are starting to move beyond the ‘five freedoms’. For example, the ACT’s Animal Welfare & Management Strategy 2017–2022 states that: Contemporary animal welfare aims for a reduction or elimination of the negative experiences and a predominance of positive states in each domain so that an animal experiences a Life Worth Living. This encompasses both physical and mental wellbeing, and includes the ability to demonstrate natural species-typical behaviours.	For consideration.
m29b, m115a	RSPCA	Addition of the following standard: SA4.4 A person in charge must ensure all housing systems are designed to allow poultry to stretch to their full height and stretch and flap their wings.	For consideration, referring to full submission.

m29b, m115a	RSPCA	There should be standards in each species-specific section for all species that have a motivation to perch, including chicken layers, meat chickens, and turkeys. 1. Perches must be provided at not less than 15 cm per bird. 2. Perching must be designed to support the whole of the bird's foot and be positioned and be of a height to allow birds to access perching with minimal effort.	For consideration.
M63	WAP	<p>WAP strongly recommends including the following additional standards to provide all Australian poultry with a life worth living [see <i>submission for evidence</i>]:</p> <p><i>SA4.X Cages for meat chickens and other commercial poultry are prohibited.</i></p> <p><i>SA4.X A person in charge must phase out existing layer and breeder cages.</i></p> <p><i>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/m<sup>2</sup> is required, reached once during the lifetime.</i></p> <p><i>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.</i></p>	DG to examine technical information provided within the submission.
M59	Australian Ethical	The standards should require stocking density being at a level which allows space to move around freely.	
m93	HSI	<p>[Summarised. <u>See full submission for technical information</u>] Chapter 4 of the draft needs to be amended to ensure that perches are provided to all poultry with a motivation to perch, and adequate space should be allocated for them to satisfy their perching behaviour. Perching is a natural behaviour of chickens. Perch use is important for maintaining bone volume and bone strength. Hens show behaviour indicative of frustration when thwarted from accessing a perch. Perches can also serve as refuges for hens to avoid interactions with more aggressive hens.</p> <p>The draft needs to state that nests should be provided to hens of all species in Chapter 4. Nesting behaviour is so important to the laying hen that it is often used as a prime example of a behavioural need. Hens are highly motivated to gain access to a nest site when they are about to lay an egg. If they are denied this basic behavioural need it results in frustration and distress.</p>	

		Decades of scientific evidence suggest that hens are frustrated and distressed, and that they suffer in battery cages because there is no outlet for nesting behaviour.	
m65	Animals Aust	It is unacceptable that the provision of adequate and appropriate perch space to all poultry with a motivation to perch is not a Standard given the huge numbers of birds being farmed and the evidence supporting the judicious use of perches [cites FBWSR]. The FBWSR set out many ways in which the risks associated with providing perches can be mitigated, including rearing layers with access to perches and elevated sites, managing the height and design of perches, improving bone strength by allowing movement of layers, and genetic selection of poultry breeds. The FBWSR also set out the importance of perches for broiler breeders.	
Standard SA4.1			
m144	Dr P Groves	This standard is a vague statement open to judgmental assessment without some guidance as to what construction and facilities would meet a ‘reasonable’ action.	For consideration.
m189	S Kay	<i>A person in charge must take all ‘reasonable action’.</i> Again, too vague. Standards should be specific.	
m44	EPANSW	Supported.	No action required.
m65	Animals Aust	Acceptable.	
Standard SA4.2			
m10	ADO	Recommend that SA4.2 be redrafted so that a person in charge must ensure all housing systems are designed ‘ <i>to allow poultry <b>to stand, lie and stretch their wings and limbs and perform normal patterns of behaviour</b></i> ’.	For consideration.
m100	L Hoiles	Amend to include ‘ <i>natural standing posture <b>and movement behaviours</b></i> ’	



m200	S Koh	Housing systems should be designed to allow poultry adequate room to stretch and flap their wings, not just ‘maintain a natural standing posture.’ The minimum standard as specified is grossly inadequate.	
m95	LIV	Draft Standard SA4.2 is not specific and clear enough to protect the animal’s welfare. It does not clearly define an adequate housing system that would ensure birds have the ability to stand.	
m147	Sentient	This is an embarrassingly weak minimum compared to international standards. We should be following the lead of the EU and other nations by banning battery cage systems for layer hens and affording them the opportunity to express natural behaviours, which is a basic freedom essential for mental and physical well-being. Such behaviours include dustbathing in appropriate litter substrate, perching, foraging, exercising (including walking freely, jumping, flying and flapping their wings), exploring and engaging in comfort behaviors such as stretching and preening.	
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	
Standard SA4.3			
m65	Animals Aust	Acceptable	No action required.
m44	EPANSW	Supported	
m63	WAP	<p>WAP strongly recommends including the following additional standards to provide all Australian poultry with a life worth living <a href="#">[see submission for evidence]</a>:</p> <p><i>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.</i></p>	For consideration

## Standard SA4.4

m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade Standard: <i>A person in charge must ensure <b>only wooden slatted floors</b> are constructed. <b>Slatted floors must</b> support the forward facing toes, prevent entrapment and facilitate removal of manure.</i> [Evidence for this recommendation comes from the FBWSR]	Consider technical information included with submission.
m63	WAP	WAP strongly recommends including the following additional standards to provide all Australian poultry with a life worth living [see submission for evidence]:  <i>SA4.4 Poultry should not be raised on wire or slats as the majority flooring</i>	
m147	Sentient	This is too vague. A timeframe needs to be set for the removal of manure. A person in charge could leave manure to accumulate for a year under the current reading.	For consideration.
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	

## Standard SA4.5

m17	J Cordina, Cordina Chickens	Although we recognize the importance of minimizing the exposure of a bird to excreta from other birds, this is not a practical requirement for perches in all housing systems, and will greatly limit the perch designs and the compliance of using perches in poultry houses. In addition, birds reared on floor are naturally exposed to excreta from other birds.	Consider making this standard a guideline.
m177	J Johnson	Uh? How do we stop a bird from defecating on another bird?	
m206	Darwalla	Irrelevant to health and welfare in modern floor-based systems where poultry are exposed to excreta continuously. Should be deleted.	
m39	AVPA	Suggest this standard be removed. This is not a practical requirement for perches in all housing systems. This may be included for old, dual-tier caged systems? Perches in barn, aviary and free	

		range systems for all species of poultry could not be positioned to protect birds from excreta from birds perching above.	
m56a	Name withheld by request	Fantastic! But also perches should be designed to prevent disputes and violence amongst the flock, that is not inclined (not ladder style perches).	For consideration.
m95	LIV	The LIV submits that draft Standard SA4.5 should be more specific in ensuring that the animals’ health and wellbeing is protected from excreta from other birds.	
m147	Sentient	We believe that this standard needs review as all perches on aviary systems do not meet this requirement. Furthermore it would appear to contradict wording in GB1.16 – last point being “minimise soiling of birds below”.	
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	
Guideline GA4.1			
m100	L Hoiles	Suggestion to amend ‘should’ to ‘must’, and space allowance as would be found in a natural habitat.	For consideration.
m29b, m115a	RSPCA	Addition of the following standard, taken from the Model Code of Practice:  GA4.1 Advice on welfare aspects must be sought when new equipment is being purchased, new buildings being constructed, or existing buildings modified.	
m65	Animals Aust	It is unacceptable this Guideline is not a Standard given the huge numbers of birds being farmed and the potential for facilities and equipment to adversely affect animal welfare. The community expects farmers to exercise a basic duty of care. It is not possible to comply with SA4.1 without complying with GA4.1.	

## Guideline GA4.2

m194	J Sanderson	This should be a Standard for anything 'likely to cause an injury' as otherwise the Guideline doesn't go as far as any of the state Animal welfare or POCTA [Prevention of Cruelty to Animals] Acts.	For consideration.
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## Guideline GA4.3

m83	B Van Elburg	Upgrade to standard.	For consideration.
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## Guideline GA4.4

m34	Voiceless	Specifically, Voiceless recommends converting Guideline GA4.4 to a Standard, so that maintenance programmes must be in place for all equipment where any malfunction or failure would jeopardise poultry welfare.	For consideration.
m83, m173	B Van Elburg, M Chester	Upgrade to standard.	For consideration.

## Guideline GA4.5

m10	ADO	This guideline suggests that the provision of ' <i>environmental enrichment should be considered</i> '. The ADO submits that this is inadequate. While it continues to be legal to farm birds in intensive conditions, environmental enrichment that enhances poultry welfare should be mandatory requirements in intensive housing systems. Recommendation: that the first four enrichment materials listed in GA4.5 be minimum mandatory requirements for all intensive housing systems.	For consideration, including examination of technical information provided within the submissions.
m100	L Hoiles	Suggestion to amend ' <i>Provision of environmental enrichment should be considered</i> ' to ' <i>Provision of environmental enrichment <b>must</b> be considered and <b>documented</b>.</i> '	

m200	S Koh	Environmental enrichment should be provided, not merely ‘considered’. This will reduce stress on the animals and result in better welfare.	
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard: <i>Provision of environmental enrichment <b>must be provided</b>, taking into account potential risks and benefits to poultry welfare. Such practices may include provision of: bales of hay or straw; perches/barriers; objects for pecking; dust-bathing material; a radio in sheds to accustom poultry to a range of noises and voices. [Evidence for this recommendation provided from the FBWSR].</i>	
m147	Sentient	Environmental enrichment should be a compulsory standard, NOT a guideline. Again, this point demonstrates the unprogressive nature of these standards and guidelines, which are totally out of keeping with some international trends and current research in animal welfare science	
m65	Animals Aust	It is unacceptable this Guideline is not a Standard given the huge numbers of birds being farmed and the evidence available that appropriate environmental enrichment is important (at the very least for laying hens in relation to IP [injurious pecking]) [ <u>cites the FBWSR to support this</u> ].	Review inclusion of radio within enrichment materials and consider removal.
m73	AVA	There is not agreement that radios in shed are good welfare. We suggest this be removed.	
m17	J Cordina, Cordina Chickens	Lack of scientific evidences demonstrating the welfare benefits of using a radio in sheds, or to show what types of music and duration is beneficial or detrimental to poultry welfare. The inclusion of using radio in sheds should be removed.	
m177	J Johnson	This enrichment criteria is the biggest load of gobbledegook. Perches and dust bathing only! Music and pecking objects have no use [for] broilers.	
m39b	AVPA	The suggestion of the radio should be removed, as there is conflicting evidence about what type of music and duration is beneficial or detrimental to poultry welfare. Additionally, the term ‘effective enrichment’ should be considered to indicate that the value of enrichment can be assessed by observing the use of enrichment items.	

## Guideline GA4.6

m100	L Hoiles	Housed Poultry: Poultry should only be housed in a way that is for their protection and in alignment with their natural behaviours. Artificial light, condensed housing should not be an option for poultry farmers.	For consideration.
m83, m173	B Van Elburg, M Chester	Upgrade to Standard. Every action must be taken to ensure that machinery and infrastructure are as quiet as possible through the use of the best available technology and through maintenance.	
m29b, m115a	RSPCA	<p>The addition of the following bold text to the following guideline:</p> <p><i>GA4.6 Exposure of poultry to stimuli <b>including sudden or loud noises</b> that might cause fear and distress should be minimised where possible. Ventilation fans, feeding machinery or other indoor or outdoor equipment should be constructed, placed, operated and maintained in such a way that they cause the least possible amount of fear and distress.</i></p> <p>The ‘sudden or loud noises should be minimised’ was deleted from an earlier draft of the standards. It is a stressor and should be included as an example of stimuli that can cause fear and distress.</p>	For consideration, including examination of technical information provided within the submissions

## Guideline GA4.7

m29b, m115a	RSPCA	The RSPCA recommends that this guideline become a standard. Inspecting animals is basic husbandry and critical to their welfare.	For consideration, including examination of technical information provided within the submissions.
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## Guideline GA4.8

m173, m194	J Sanderson	This should definitely be a standard.	
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m29b, m115a	RSPCA	<i>Poultry should have enough vertical and horizontal space available to stretch to their full height, stretch and flap their wings, <b>to walk freely, perch, ground-scratch, forage, and dust bathe.</b></i>  The RSPCA recommends that this guideline become a standard, and that the above bolded words be included. It is also included in the principles for poultry welfare section, where it is acknowledged that space to stand, lie and stretch their wings and limbs is essential to meet welfare requirements.	For consideration, including examination of technical information provided within the submissions.
m34	Voiceless	It is crucial that Guideline GA4.8 is converted to a Standard if the S&G are to achieve any semblance of meaningful animal welfare.	
m65	Animals Aust	It is unacceptable this Guideline is not a Standard given the huge numbers of birds being farmed and the strong evidence that poultry need to have sufficient space to perform these behavioural activities to meet their basic welfare requirements. This Guideline effectively permits the continued use of [conventional cages], which we strongly oppose, and to a lesser extent, the use of [furnished cages], which we also oppose, as well as permits unacceptably high stocking densities in all housing systems <u>[cites the FBWSR and discusses further in the submission]</u> .	
Guideline GA4.10			
m100, m173	L Hoiles	Suggestion that poultry are not brooded on wire in any circumstances.	For consideration.
m83	B Van Elburg	Amend and upgrade to Standard: <b><i>Poultry must be brooded in non-cage production systems, on wooden slatted floors with appropriate litter. Poultry must not be brooded in cages as the community demands that caged production systems be phased out immediately.</i></b>	For consideration.
Guideline GA4.11			
m39b	AVPA	Space allowances for perches should be provided for all species of poultry, where appropriate.	For consideration.
m147	Sentient	The provision of perches with adequate perch space should be essential, and therefore a standard, for all birds with the motivation to perch.	For consideration, including examination of technical

m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard: <i><b>Perches must be designed and fitted to reduce the risk of vent pecking.</b></i>	information provided within the submissions.
Guideline GA4.12			
m39b	AVPA	Space allowances for perches should be provided for all species of poultry, where appropriate.	For consideration.
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard: <i><b>Perches must be designed and located to minimise the risk of injury when mounting or dismounting perches.</b></i>	For consideration, including examination of technical information provided within the submissions.
m65	Animals Aust	It is unacceptable that the provision of adequate and appropriate perch space to all poultry with a motivation to perch is not a Standard.	
Guideline GA4.13			
m65	Animals Aust	It is unacceptable that [this] ... is not a Standard.	For consideration, including examination of technical information provided within the submissions.
m173	M Chester	Upgrade to a Standard.	
Guideline GA4.14			
m39b	AVPA	Space allowances for perches should be provided for all species of poultry, where appropriate.	For consideration.
m83, m173	B Van Elburg, M Chester	Amend and upgrade to Standard: Perching areas must be designed to allow poultry to grip without risk of trapping their claws.	For consideration, including examination of technical information provided within the submissions.
m65	Animals Aust	It is unacceptable that [this] ... is not a Standard.	



## Guideline GA4.15

m100	L Hoiles	Nests should be provided.	For consideration.
m34	Voiceless	In order to avoid regressing from the benchmark set by the MCOP, the proposed S&G must convert Guideline GA4.15 to a Standard, and amend and convert Guideline GB1.6 to a Standard, to the effect that nests must be provided and must provide seclusion from the flock, be of adequate size and number to meet the laying needs of all poultry, and ensure poultry can lay without undue competition.	
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard: <b><i>Nests must be provided to provide seclusion from the flock and should be of adequate size and number to meet the laying needs of all poultry, and ensure poultry can lay without undue competition.</i></b>	
m65	Animals Aust	It is unacceptable that access by hens of all species to suitable nests is not a Standard given the huge numbers of birds being farmed and the strong evidence that being unable to nest has negative welfare outcomes. This Guideline effectively permits the continued use of conventional cages, which we strongly oppose, and to a lesser extent, use of furnished cages which we also oppose [cites the FBWSR].	

## Guideline GA4.16

m155	Dr D Evans	Convert Guideline 1.6 to a Standard to ensure all hens are provided with a nest.	For consideration.
m83, m173	B Van Elburg, M Chester	Amend and upgrade to Standard: <b><i>Nest boxes must be provided which are easily accessible and should not be so high above the floor level that poultry may be injured when ascending or descending.</i></b>	
m147	Sentient	Nest boxes should be a requirement, and therefore, a standard.	
m65	Animals Aust	It is unacceptable that access by hens of all species to suitable nests is not a Standard.	

### Guideline GA4.17

m83, m173	B Van Elburg, M Chester	Amend and upgrade to Standard- Nest Litter must be provided and kept clean, dry, friable and moisture adsorbent. Nest liners must be kept clean and dry.	For consideration.
m65	Animals Aust	It is unacceptable that access by hens of all species to suitable nests is not a Standard.	
m44	EPANSW	“Absorbent” is spelt incorrectly.	Adsorbent is the correct term, so no action required.

### Guideline GA4.18

m39b	AVPA	Recommend adding to this guideline to include aspects of 2.4.5.3 in the previous MCOP that birds ‘should have access to the range ‘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’.	For consideration.
m83, m173	B Van Elburg, M Chester	Birds must be able to walk through opening without having to jump through them. Amend and upgrade to Standard: <i>Access to the outdoors <b>must</b> meet the following requirements: openings <b>must</b> be of a height to allow birds to pass through using normal posture; design and position of openings <b>must</b> avoid birds being able to obstruct the movement of other birds; position of openings <b>must</b> allow the outdoors to be visible to birds at ground level within the laying facility; the area around openings <b>must</b> be kept clean and well drained.</i>	For consideration, see also SA4.3.
m73	AVA	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).	
m147	Sentient	All of the above should be compulsory. Furthermore, the following requirements are essential for ensuring that birds access free range areas <a href="#">[technical evidence provided in the submission]</a> : Access for a minimum of eight hours per day; Shelter from predation and weather extremes via suitable fencing and the provision of wind breaks, shade and foliage; Regular rotation of the outdoor area to reduce parasite burden and maintain the attractiveness of the area to hens;	DG to consider the technical information within submission.

		Regular exposure to outdoor enclosures in the rearing environment between 12 and 20 weeks of age; Genetic selection of hens adapted to systems with outdoor ranges, which reduces feather pecking.	
Guideline GA4.19			
m83, m173	B Van Elburg, M Chester	Amend and upgrade to Standard: <b><i>Ramps must be provided which must be made from non-slip material, allow for minimal effort and ease of bird movement and be cleaned after each batch.</i></b>	For consideration.

# Standards and Guidelines A5 Management of Outdoor Systems

## Key issues:

- Definitions for terms
- Management of the outdoor area

## Section 5 Management of Outdoor Systems - General Comments

Submission Code	Submitter	Submission	Recommendation
m46	G Arzey	Very few relevant standards to enforce minimal requirements on the accessibility or management of the outdoor area.	For consideration.
m34	Voiceless	Mandate the provision of shade, shelter and vegetation for outdoor ranges, and a minimum period of daily access. In order to encourage and ensure basic welfare for poultry in outdoor ranges, Voiceless recommends converting Guidelines GA5.1 and GA5.2 to Standards. Furthermore, it is essential that poultry be provided with sufficient access to the outdoor range in order to become accustomed to and properly benefit from accessing the outdoor environment. To at least replicate the stipulations from clause 2.4.5.3 of the MCOP, a Standard should be introduced into Chapter 5 to require that all adequately feathered poultry have ready access to the outdoor range during daylight hours for a minimum of 8 hours per day.	For consideration.
m73	AVA	As for GA 4.18, a minimum duration of access (8 hours) during daylight hours should be set as a standard.	For consideration.

## Standard SA5.1

m194	J Sanderson	This is not necessary as a standard so long as animals have proper access to both indoors and outdoors. This means Standard 5.2 makes 5.1 unnecessary but not vice versa.	For consideration.
m44	EPANSW	Supported in principle but perhaps a definition of ‘adequately feathered’ might be helpful.	For consideration.
m144	Dr P Groves	This requires a definition, or at least some guidance as to what constitutes ‘adequate’ feathering. As drafted the Standard would be open to judgemental assessment and would be difficult to verify. Perhaps this should be moved under a Guideline?	
m51	McLean Farms	Glossary definition for ‘adequately feathered’ based on age for the different species. If a definition is not included and then the S&G is legislated and audited upon, a degree of subjectivity will apply to this term. It is assumed that the intent is with respect to thermal control in weather extremes on the range.	
m65	Animals Aust	Acceptable.	No action required.

## Standard SA5.2

m29b, m115a	RSPCA	<p>The following standard has been changed to add ‘kept in housing’. This addition means that any poultry that are kept outside do not need access to a shed and shaded areas. The RSPCA strongly objects to this wording. All species should have access to shelter for protection from sun and extreme weather conditions. The RSPCA proposes the following change</p> <p><i>SA5.2 A person in charge must ensure poultry <del>kept in housing</del> with access to an outdoor area have ready access to the shed and shaded areas.</i></p>	For consideration.
m147	Sentient	Include specification that this also needs to be for protection from aerial predators.	For consideration
m65	Animals Aust	Acceptable.	No action required
m44	EPANSW	Supported.	

### Standard SA5.3

m177	J Johnson	I've never seen this one before - 'poisonous plants'? Chickens don't and won't eat poisonous plants!	For consideration.
m194	J Sanderson	The term 'seriously' should be removed, causing disease is bad enough and the definition of 'seriously' will be impossible to define properly in regulations	Suggest removing the word 'seriously' and changing 'prejudice' to 'compromise'.
m200	S Koh	The word 'seriously' should be removed. It is subjective and doesn't add value, and provides an out for owners to keep poultry on contaminated lands such that this harms the animals.	
m29b, m115a	RSPCA	The following change is proposed, indicated with strike through and bolded text below: SA5.3 <i>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 <del>seriously prejudice</del> <b>compromise</b> the health of poultry.</i>	
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	

### Standard SA5.4

m144	Dr P Groves	Requires that actions are taken to minimise access by wild birds to the birds' feed and drinking water. This, as it is a Standard, 'essentially will make the "caravan-style" free range farms illegal as feed and water are supplied only outside the structure in that style of facility. These types of facilities do not provide feed and water inside the structure. Feed is supplied in various types of hopper feeders placed outside to allow easy access by the chickens. It is yet to be seen how these wild birds can be prevented or discouraged in these facilities, and I anticipate that this will be very difficult to achieve in a practical, cost-effective, manner.	For consideration
m44	EPANSW	Supported.	No action required.
m65	Animals Aust	Acceptable.	

## Standard SA5.5

m197	PROOF	The purpose of this standard is unclear. We can only assume that it means that the poultry could be confined inside housing to manage a welfare risk if one was present in the outdoor area. If this is the case, this standard is open to abuse and must be revised.	For consideration.
m144	Dr P Groves	Notes that the presence of a disease organism in the outdoor area poses a risk to the welfare of the poultry. Internal parasites and their intermediate hosts are guaranteed to be present in range areas and are difficult to treat and in some cases unable to be treated (see comments under GA 3.15).	For consideration.
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	

## Guideline GA5.1

m200	S Koh	Should include minimise the risk of predation as a dot point.	Add “minimise the risk of predation” as a dot point.  Add “and other animals” to the dot point about wild birds.
m206	Darwalla	There is no mention of minimising contact with wild or domestic animals.	
m39b	AVPA	Wild birds should be expanded to ‘wild birds and wild animals’.	
m83, m173	B Van Elburg, M Chester	Raise to Standard.	For consideration.
m34	Voiceless	Voiceless recommends converting Guidelines GA5.1 a Standard.	
m73	AVA	Management of the outdoor area -, 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.	For consideration.

m65	Animals Aust	It is unacceptable these Guidelines are not Standards given the huge numbers of birds being farmed and the potential for mortality in free range enterprises. The community expects farmers to exercise a basic duty of care. The answer is not to put layers in cages but rather to ensure outdoor access is safe and well managed.	For consideration.
m39b	AVPA	The mention of palatable vegetation should be excluded, as palatable vegetation can lead to nutrient dilution and increases the risk of grass impaction.	For consideration.
Guideline GA5.2			
m34	Voiceless	Voiceless recommends converting Guidelines GA5.1 and GA5.2 to Standards.	For consideration.
m73	AVA	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.	For consideration.
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	For consideration.
Guideline GA5.3			
m83, m173	B Van Elburg, M Chester	Raise to Standard.	For consideration.
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	For consideration.
M73	AVA	GA5.3 should be a Standard.	For consideration
Guideline GA5.4			
m197	PROOF	The draft code does not provide a meaning for 'confined'. The draft does refer to housing systems for poultry and includes a definition in the Glossary for housing of non-caged birds. However, there is no indication of what 'confined' means. If the intent is that confined should mean limited	For consideration.



		to a certain location (e.g. a smaller area surrounding a mobile shelter that is defined with electric bird netting), then this should be made very clear to avoid confusion and perhaps insistence by some parties or authorities that the birds must be confined within a shed.	
m206	Darwalla	There is no difference between biosecurity risk in daylight hours and night time hours.	Suggest removing 'biosecurity' from the Guideline.
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	For consideration.
Guideline GA5.5			
m206	Darwalla	Misleading statement. This statement should not be confined to outdoors areas. It is a fundamental health management requirement in all housing systems.	Suggest move to Section 4 and expand to include all housing systems.
m39b	AVPA	This guideline should be expanded to all types of housing systems, where there may be carryover of pathogens between flocks. It may be difficult in multi-age systems but is warranted after depopulation of indoor housing.	
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	For consideration.

# Standards and Guidelines A6 Lighting

## Key issues:

- Minimum light levels for all poultry
- Allowing for average light levels within sheds
- Allowing for lower light levels to manage feather pecking

## Section 6 Lighting - General Comments

Submission Code	Submitter	Submission	Recommendation
m94	J Haviland & M Derby	Minimum light levels: The proposed standards allow poultry to be kept in near-dark conditions for most of their lives, not allowing the expression of normal behaviours and eye development, and without adequate light and dark periods for normal behaviour and rest. This treatment is inhumane as birds must have access to normal light throughout the day.	For consideration.
m34	Voiceless	The draft S&G permit the use of near continuous low-level lighting. It has been found that continuous and/or low artificial lighting can have serious behavioural and physical welfare impacts.	For consideration.
m95	LIV	The LIV submits that the guidelines in Chapter 6 are inadequate and do not ensure that there is a minimum light level for the birds. These guidelines, which would be more effective as Standards to ensure compliance, should ensure that birds have a period of continuous darkness that is representative of natural experiences.	For consideration.
m63	WAP	WAP recommends the following additional standards <a href="#">[see submission for explanation and evidence]</a> :  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.	DG to examine technical information provided within the submission.

		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.	
m93	HSI	In Chapter 6, the draft stipulates for poultry to be kept in near-dark conditions almost constantly which can have adverse welfare consequences such as detrimental effects to their eye development and behaviour. All birds need to be exposed to a minimum of 8 hours of continuous darkness during each 24 hour period to allow adequate rest, and during light periods the minimum light intensity should be at least 10 lux rather than 5 lux (SA6.3).	For consideration.
m29b	RSPCA	The RSPCA recommends the addition of the following new standard.  SA6.5 A person in charge must ensure the lighting system provides a minimum period of 8 hours continuous artificial or natural lighting per day, and a minimum period of 4 hours continuous darkness (with all lights off) to be provided at night, in every 24 hour period	
Standard SA6.1			
m83	B Van Elburg	Amend Standard: <i>A person in charge must ensure that the light intensity on poultry must be <b>at a level that they can see clearly proximally and distally and to allow each and every animal</b> and equipment to be inspected and any problems to be identified.</i>	For consideration.
m50, m173	L McKenna, M Chester	Proposed amendment: <i>A person in charge must ensure that the light intensity <b>for poultry is appropriate for each species</b> [evidence from the FBWSR provided].</i>	For consideration.
m44	EPANSW	Supported.	No action required.
Standard SA6.2			
m17	J Cordina, Cordina Chickens	Lighting intensity reading is not always evenly distributed across a shed, and a single measurement of Light intensity at any one point in a shed is unlikely to be representative of the light intensity of the	Suggest adding that this light intensity needs to be an

		overall shed. Therefore SA6.2 needs to clarify that a lighting intensity of 20 lux needs to be an average.	average, and allowing a phase-in period.
m64, m66, m67, m68	ACMF, ACGC, Ingham's et al	<p>Light intensity is not always evenly distributed across a shed, and a single measurement of light intensity at any one point in a shed is unlikely to be representative of the light intensity in the shed overall or at all points in the shed. The fact that light intensity varies across the shed is not in itself a problem – in fact, there is recent evidence to suggest that this is desirable from a bird welfare perspective – but it does complicate measurement, interpretation and enforcement of this standard. Standard SA6.3 already acknowledges this, in clarifying that the minimum light intensity that applies is an average. SA6.2 similarly needs to clarify that the 20 lux minimum is an average.</p> <p>There will be a significant cost burden upon some growers in meeting this standard. This cost derives from the need, in the majority of impacted cases to rewire sheds, including to provide more light points, and in some cases to completely upgrade the power supply to the entire farm. This will mostly impact on farmers with older sheds, who will also most likely be smaller enterprises, and the cost to individual affected farmers would be very substantial. Therefore, a phase in period is needed, to allow farmers affected by this standard time to invest in this upgrade, or if investment to upgrade existing facilities is not considered worthwhile, to invest in completely new facilities.</p> <p>The standard must clarify that the 20 lux is an 'average' i.e. <i>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, <b>on average</b>.</i> There must be a "phase in" period of at least 5 years post S&amp;G sign-off for this standard, to allow necessary facilities to be modified or replaced.</p>	
m63	WAP	Recommend the following modified standard. SA6.2 <i>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 [see submission for evidence].</i>	Examine technical information provided within the submission.
m44	EPANSW	Supported in principle.	No action required.

## Standard SA6.3

m63	WAP	Remove SA6.3 <a href="#">[see submission for evidence]</a>	Examine technical information provided within the submission
m34	Voiceless	Voiceless recommends increasing the minimum lux prescribed by Standard SA6.3	For consideration
m194	J Sanderson	This level is ridiculously low and given it is an average will not apply properly to cage systems. More sensible would be stating something like ‘Poultry need a minimum of 25 lumens at the position of the bird with the exception of in nesting boxes’.	
m200	S Koh	An average light intensity of at least 5 lux during light periods is ludicrous! Poultry kept in sheds already suffer from being kept indoors their entire lives. Lighting should mimic natural conditions as far as possible, i.e. the light intensity of sunlight during daylight periods (or at least 50 lux).	
m110, m114, m155, m3, m110, m117	C Davis, G Walker, Dr Di Evans, G Rickuss, C David, J Kendall	Should be amended to ensure that the minimum light intensities for all poultry be increased to at least 10 lux.	
m65	Animals Aust	SA 6.3 needs to be amended to ensure that the minimum light intensities for all poultry are increased to at least 10 lux.	For consideration.
m38	AFSA	We support RSPCA’s recommendation in relation to the lighting: The amending of SA 6.3 to ensure that the minimum light intensities for all poultry are increased to at least 10 lux. We add to this recommendation that this be a temporary Standard in consideration of a recommended phase out of indoor poultry systems.	
m83	B Van Elburg	Amend Standard to incorporate the recommendations by Animals Australia for light intensities for each poultry species as well as their recommendations for the optimal continuous period of natural light to be provided for poultry.	
		The RSPCA recommends the below revisions in bold and strikethrough text:	

m29b, m115a, m94	RSPCA, J Haviland & M Derby	SA6.3 A person in charge must ensure that the light intensity for poultry is at least <b>10 5 Lux on average during light periods. Average lux may be reduced temporarily during outbreaks of feather pecking or during catching for transport.</b>	Suggest including the allowance to lower light intensity for short periods of time.
m64, m66, m67	ACMF, Ingham's Turkey, Ingham's chicken meat	There needs to be an exception to this standard to allow light intensity to be used to manage a severe outbreak of pecking (which leads to cannibalism) in breeder chickens and in turkeys. Outbreaks of pecking result in significant negative impacts on bird welfare and to increased mortality in flocks. There are few other measures, other than reducing light intensity, that are available to farmers to control an outbreak of pecking once it has started. Provision needs to be made in the standard to allow light intensity to be used specifically for this purpose. To ensure that this exception is not misused, it is suggested that it only be allowed under veterinary supervision and only for short periods of time (not the life of a flock). A suggested revised wording of this standard which encapsulates those safeguards is provided below:  <i>"A person in charge must ensure that the light intensity for poultry is at least 5 Lux on average during light periods, <b>except where, under veterinary supervision and for a short period only, light intensity is reduced to control an outbreak of pecking in breeders or turkeys</b>".</i>	
m206	Darwalla	There needs to be [an] allowance to lower this level as a management tool to control feather pecking and cannibalism.	
m17, m39b	J Cordina, Cordina Chickens; AVPA	Light intensity reduction is a critical method of controlling feather pecking and cannibalism. Whilst light levels should be routinely maintained at 5 lux or above, there needs to be a provision to allow for further reduction in light intensity below 5 lux for a short period on welfare grounds in laying chickens, meat chicken breeders and turkeys. As a safeguard, a veterinarian could authorise the exemption in these exceptional circumstances.	
m44	EPANSW	Supported in principle.	No action required.
Standard SA6.4			
m29b, m115a	RSPCA	The RSPCA recommends the below revisions in bold and strikethrough text:	For consideration.

		<p>SA6.4 <i>A person in charge must ensure poultry are not exposed to continuous light or darkness in any 24 hour period except on the day of pick-up (meat chickens) and meat chickens during very hot weather.</i></p> <p>As detailed in the [submission], all species have a requirement for a dark period and they should certainly not be deprived of this in the standards</p>	
m83	B Van Elburg	Amend Standard: <i>A person in charge must ensure poultry are not exposed to continuous light or darkness in any 24 hour period.</i>	
m65	Animals Aust	Australia generally has a hot climate and is getting hotter. Keeping meat chickens in darkness (see SA6.4) as a way to deal with hot weather is unacceptable and sheds need to have effective cooling and ventilation (also see SA7.1).	Suggest clarifying purpose of standard
m51	McLean Farms	Wording not clear.	Consider rewording.
m71, m76, m78, m80, m84, m91, m99, m181, m183, m187, m166, m165, m151, m140, m132, m133, m138	Exhibition poultry submitters	Exhibition poultry should be excluded from these, as they use small brooders to raise chickens until they are old enough to be in more appropriate pens and a heat source (most commonly a heat lamp) is used in these brooders. Request that exhibition poultry be excluded from 6.4 and 6.5 or they are re-written to accommodate the husbandry requirements of rearing small batches of chickens.	For consideration.
m44	EPANSW	Not supported. Exhibition and purebred poultry should be specifically excluded from this standard. Chickens hatched in incubators are transferred into brooders, some of which will have lights as a heats source. Turning off these lights will put the lives of the chicks at risk.	

## Standard SA6.5

m10	ADO	<p>This standard requires that birds are ‘<i>exposed to at least 4 hours of continuous darkness within a 24 hour period</i>’. The ADO submits that this is manifestly inadequate and can lead to negative welfare outcomes, particularly for layer hens. Artificial lighting forces hens to lay eggs during periods when they naturally would not lay eggs (for example, winter).</p> <p>SA6.5 would allow lengthy periods of artificial lighting which can have a serious impact on the welfare of birds. Recommendation: that the minimum darkness period mandated in SA6.5 be changed to natural levels for all poultry</p>	For consideration.
m100	L Hoiles	Strong suggestion that this is amended to include ALL poultry are exposed to a minimum requirement of continuous darkness and that this be longer than 4 hours.	
m110, m117, m155	C Davis, Dr Di Evans, J Kendall	Should be amended to require 8 hours of continuous darkness in each 24 hour period for all poultry.	
m147	Sentient	This is inadequate. The practice of long photoperiod must be eliminated. Increasing light intensity reduces the range of behaviour and the amount of time birds spend feeding. Improvements can be made to their welfare by exposing them to a maximum of 16-17 hours of light per day. This standard should read that all birds are exposed to at least 8 hours of continuous darkness within a 24-hour period.	
m194	J Sanderson	I see no reason this standard should not apply to all poultry. It is an unnatural state for all birds.	
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend Standard: <i>A person in charge must ensure <b>all</b> poultry <b>including</b> meat chickens, emus, ostriches and quail are exposed to at least 8 hours of continuous darkness within a 24 hour period [uses the FBWSR as evidence].</i>	Consider technical information provided in the submission
m65	Animals Aust	SA6.5 need to be amended to ensure that that 8 hours of continuous darkness are provided in each 24 hour period, respectively.	For consideration



m38	AFSA	We support RSPCA's recommendation in relation to the lighting: Amending standard SA6.5 to require 8 hours of continuous darkness are provided in each 24 hour period for all poultry. We add to this recommendation that this be a temporary Standard in consideration of a recommended phase out of indoor poultry systems.	
m197	PROOF	Comment: There is clearly a need for at least 2 sessions of 4 hours of continuous darkness. This change to only 4 hours of continuous darkness in a 24 hour period is not in the best interest of the welfare of the birds	For consideration
m206	Darwalla	This is in conflict with standard SB2.1 which states that minimum 4 hours dark is not required till after 7 days of age.	For consideration
m29b, m115a	RSPCA	The RSPCA recommends the below revisions in bold and strikethrough text. As detailed in the [submission], all species have a requirement for a dark period and they should certainly not be deprived of this in the standards.  SA6.5 A person in charge must ensure poultry <del>except for meat chickens, emus, ostriches and quail</del> are exposed to at least 4 hours of continuous darkness within a 24 hour period.	For consideration technical information provided in the submission.
m3	G Rickuss	[Recommend] amending standard SA6.5 to require 8 hours of continuous darkness in each 24 hour period for all poultry.	For consideration
m34	Voiceless	Voiceless recommends amending Standards SA6.5 and SB1.5 to provide for at least 7-8 hours of continuous darkness in each 24 hour period.	
m39b	AVPA	Excluding meat chickens is confusing in this standard – needs to be considered in conjunction with SB2.1. Furthermore, there may be exceptions to 4 hours continuous darkness in the first 7 days for all types of poultry. Between 3 and 7 days after placement, an intermittent lighting program with 4 hours light on followed by 2 hours lights off, has been a successful strategy for layer chicks. This program has reduced 7 day mortality, improved activity and feed intake. Is there a reason why emus, ostriches and quail are excluded?  Midnight feeding of layers is a vital management practice for layers during hot weather periods (1 to 2 hour period in the middle of the dark period where lights are turned on to increase feed and water intake). This practice is well recognised and practiced to reduce mortality and morbidity of laying chickens. Typically birds will have 16 hours light, 3 hours off, 2 hours on, 3 hours off then back to 16	For consideration.

		hours. This is an important management tool to improve welfare in hot weather and must not be removed.	
m17	J Cordina, Cordina Chickens	The way SA6.5 and SB2.1 were written is confusing and conflicting - Needs to be reworded:  <i>A person in charge must ensure poultry <b>are exposed to at least 4 hours of continuous darkness within a 24 hour period, for emus, ostriches and quail, and meat chickens after 7 days of age or on the day of pickup or during very hot weather.</b></i>	Consider changing the wording of this standard.
m64, m66, m67, m68	ACMF, ACGC, Ingham's Turkey, Ingham's chicken meat	Under standard SA6.5, the exemption from 4 hours of continuous darkness each day is applied to meat chickens generally, whereas (a) the original intention was that the exemption would apply only to meat chickens up to 7 days of age, and (b) there is a conflicting statement at SB2.1 that says: "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".  We believe that these standards should be amended to remove the conflict. A possible alternative wording is provided: " <i>A person in charge must ensure poultry <b>are exposed to at least 4 hours of continuous darkness within a 24 hour period, except for emus, ostriches and quail, and meat chickens.</b></i> "	
m71, m76, m78, m80, m91, m99, m181, m183, m187, m166, m165, m151, m140, m44, m132, m133	Exhibition poultry submitters	Exhibition poultry should be excluded from these, as they use small brooders to raise chickens until they are old enough to be in more appropriate pens and a heat source (most commonly a heat lamp) is used in these brooders. Request that exhibition poultry be excluded from 6.4 and 6.5 or they are re-written to accommodate the husbandry requirements of rearing small batches of chickens.	For consideration.

m51	McLean Farms	<i>A person in charge must ensure all poultry except for <b>rearing laying pullets</b>, meat chickens, emus, ostriches and quail are exposed to at least 4 hours of continuous darkness within a 24 hour period.</i>  Management practice requires the inclusion of rearing laying pullets in the exclusion.	For consideration.
m61	SBA	SBA strongly supports the use of intermittent lighting in the first 7 days after hatching – 4 hours lights on followed by 2 hours lights off – before changing to no less than 4 hours lights off every 24 hours at 7 days of age. SBA has shown from implementation of this lighting program significant positive benefits to mortality, weight gain and uniformity. We strongly believe this intermittent lighting program in the first 7 days of life should be permitted under this standard as it results in life long improved outcomes for the hens.	For consideration.
Guideline GA6.1			
m206	Darwalla	Meat breeders cannot have lighting in nest boxes so this needs to be clarified in the guidelines.	For consideration.
Guideline GA6.2			
m200	S Koh	Why are chicks allowed to have 23 hours of light during a 24 hour period?! This is stupid. How would you like to have 1 hour of darkness per day? Lighting should mimic what poultry would naturally have in the wild as far as possible.	For consideration.
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard: <i>Chicks <b>must have 8 hrs of continuous dark</b></i> [Uses the FBWSR as <u>evidence</u> ].	Review technical information provided in the submission.

# Standards and Guidelines A7 Temperature and Ventilation

## Key issues:

- Definition of mechanically ventilated
- Clarification for ammonia monitoring
- Upgrading other monitoring to Standards rather than Guidelines

Standard SA7.1			
Submission Code	Submitter	Submission	Recommendation
m194	J Sanderson	This standard is very obtuse which makes it irrelevant for making coherent regulations between different jurisdictions.	For consideration.
m147	Sentient	Furthermore, temperature levels must be checked at least three times daily under all conditions to avoid extremes and minimise the risk of heat stress.	For consideration.
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	
Standard SA7.2			
m17	J Cordina, Cordina Chickens	Clear definition of ‘mechanically ventilated shed’ in the glossary is lacking. The ‘classification’ on ventilation systems of poultry houses could only be found in SB2.3 Meat Chickens, where housing types were classified as any of 1) Tunnel ventilated or extractive system etc, 2) other mechanically ventilated (stirring fans, water- based cooling system) OR 3) nonmechanically ventilated.	Define mechanically ventilated in the glossary, and consider amending

		Therefore under the above housing type classification automatic alarm systems to warn immediately of ventilation failure is <b>not applicable to all mechanically ventilated sheds</b> , should only be applicable to poultry houses that are solely reliant on mechanical ventilation e.g. tunnel ventilation sheds.	wording as suggested
m64, m66, m67, m68	ACMF, ACGC, Ingham's Turkey, Ingham's chicken meat	<p>The necessity for an automatic alarm system to warn of ventilation failure should only be necessary if the ventilation system is fully reliant on mechanical ventilation. If ventilation system is managed 'manually' e.g. by the farmer lifting or lowering the curtains in curtain-sided sheds, then a failure in ventilation is not a failure of the equipment, but a failure of his management, and an automatic alarm system to warn of ventilation system failure is superfluous. It is therefore suggested that the requirement for automatic alarm systems for ventilation system failure should only apply where airflow is solely reliant on the mechanical ventilation systems</p> <p>'Mechanically ventilated' needs to be defined. It should be defined in the glossary with wording below (this applies to other standards as well as here) – does it only apply to tunnel ventilated housing? Does it include stirring fans? Does it include curtains that need power to be operated? We suggest that it be defined in the glossary as housing having any ventilation component that requires power for its operation</p> <p><i>A person in charge must ensure that mechanically ventilated sheds have 1) a back-up power supply that is tested weekly; and 2) a system in place to respond and take action at the first reasonable opportunity.</i>  <b>Additionally, where airflow is solely reliant on mechanical ventilation, there must also be automatic alarm systems that warn immediately of ventilation failure.</b></p> <p><b>Mechanically ventilated</b> – to be defined in the glossary as having any ventilation component that requires power for its operation.</p>	
m51	McLean Farms	<p><i>A person in charge must ensure that mechanically ventilated sheds have:</i></p> <p>1. <i>A back-up power supply that is tested <b>fortnightly</b></i></p> <p>Particularly in examples where a 2<sup>nd</sup> redundancy supply is available we believe weekly inspections are excessive and an additional labour cost burden.</p>	For consideration.
m83, m173	B Van Elburg, M Chester	Amend Standard: <i>A person in charge must ensure that <b>mechanical cooling, heating, feeding and watering and ventilation in sheds</b> have: 1) a back-up power supply that is tested <b>daily</b>; and 2) automatic alarm systems to warn immediately of ventilation failure; 3) a system in place to respond and take action</i>	For consideration

		<i>immediately upon alert 4) Every shed must have at least one person located within the shed monitoring the poultry 24 hrs daily.</i>  If the community is expected to believe that the industry cares about the welfare of animals, it has to have at least one individual located within the shed providing 24hr supervision of the poultry and therefore having the ability to take immediate, effective action in case of system failure.	
m95	LIV	The LIV submits that draft Standard SA7.2 should provide for at least a minimum airflow level and temperature so that the animal’s welfare is protected from heat, cold, humidity, dust or noxious gas.	For consideration.
m65	Animals Aust	Acceptable.	No action required
m44	EPANSW	Supported.	
Standard SA7.3			
m108, m71, m80, m99, m181, m183, m187, m76, m78, m99, m84, m132, m133, m138	Exhibition poultry submitters	Exhibition poultry fanciers should not be expected to monitor ammonia levels given that birds are stocked at significantly reduced densities compared to commercial poultry. Exhibition breeders would not have ready access to equipment required to ensure adherence to the standard nor should they be expected to incur the expenses associated with compliance given the commercial premise of the proposed standard	Consider an exemption for exhibition poultry or define the production systems that require ammonia monitoring.
m44	EPANSW	Not applicable for exhibition, hobby or backyard fanciers where birds are stocked at significantly lower densities and in open-fronted sheds with natural variation. An unnecessary and costly addition to a hobby fancier’s equipment.	
m144	Dr P Groves	Requires regular ammonia monitoring but does not provide an adequate mechanism by which non-compliance will be monitored and reported.	For consideration.

m147	Sentient	This does not specify the frequency of monitoring. Ammonia levels must be checked daily.	Consider specifying the frequency of monitoring.
m29b, m115a, m59	RSPCA and others	<i>A person in charge must monitor ammonia levels and ensure immediate corrective action is taken if ammonia levels reach <del>15</del> 20 ppm at bird level in sheds.</i>  20 ppm is too high to trigger corrective action. There is ample scientific evidence to support this.	DG to review evidence/technical information.
m83	B Van Elburg	Amend Standard to incorporate the recommendations of Animals Australia for the maximum level of ammonia levels within sheds for each species.	For consideration.
m65	Animals Aust	Acceptable.	No action required.
Guideline GA7.1			
m83, m173	B Van Elburg, M Chester	Amend and upgrade to Standard: <i>Rapid changes in temperature must be avoided <b>via alarm systems.</b></i>	Consider upgrading to a standard.
m65	Animals Aust	It is unacceptable these Guidelines are not Standards given the huge numbers of birds being farmed and the potential for temperature and ventilation issues to adversely (and on occasions catastrophically) affect animal welfare. The community expects farmers to exercise a basic duty of care. It is not possible to comply with SA7.1 to SA7.3 without complying with GA7.1.to GA7.8.	
Guideline GA7.2			
m206	Darwalla	Pre-heating is imperative to the health and well-being of day-old chicks and should be given greater emphasis than a guideline.	Consider upgrading to a standard
m65	Animals Aust	It is unacceptable these Guidelines are not Standards	

### Guideline GA7.3

m194	J Sanderson	“Extreme” needs to be defined for appropriate regulations to be created or even a MCOP if that is the idea behind the guidelines. I suggest including a temperature and humidity at least.	Consider defining extreme.
m83	B Van Elburg	Amend and upgrade to Standard: <i>Temperature and poultry behaviour <b>must be monitored 24hrs a day by a person located within the shed.</b></i>  If the community is expected to believe that the industry cares about the welfare of animals, it has to have at least one individual located within the shed providing 24hr supervision of the poultry and therefore having the ability to take immediate, effective action in case of adverse welfare events	For consideration.
m147, m173	Sentient, public	This should be a standard.	
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	

### Guideline GA7.4

m17	J Cordina, Cordina Chickens	‘Sneezing’ is generally considered a non-specific sign for a respiratory infection of poultry, not an indicator of heat stress or cold stress. Should be removed to avoid confusion.	Suggest review indicators of heat stress and remove sneezing.
m206	Darwalla	Sneezing is not a sign of heat or cold stress	
m39b	AVPA	Sneezing should be omitted from the list of indicators of heat stress.	
m200	S Koh	Corrective action to adjust air quality parameters should be taken <u>before</u> signs of stress/suffering (as in GA7.4) are observed. Actions should be taken based on monitoring (see GA7.6 below). The document should specify the range for each air quality parameter that would maintain a comfortable environment for poultry.	Consider adding additional information to clarify.



m83, m173, m194	B Van Elburg, M Chester, J Sanderson	Upgrade to Standard.	For consideration .
m147	Sentient	This should be a standard.	
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	
Guidelines GA7.5			
m200	S Koh	Add a list of actions that should be considered during extreme weather conditions, e.g. reducing stocking densities, spraying with water, providing buckets of cool water, increasing litter, adding heaters etc.	For consideration.
m83, m173	B Van Elburg, M Chester	Upgrade to Standard.	For consideration.
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	
Guidelines GA7.6			
m177	J Johnson	‘Monitor for eye and nasal irritation’? Must we document that every day as well?	For consideration
m200	S Koh	<p>Corrective action to adjust air quality parameters should be taken <u>before</u> signs of stress/suffering (as in GA7.4) are observed. Actions should be taken based on monitoring (see GA7.6 below). The document should specify the range for each air quality parameter that would maintain a comfortable environment for poultry.</p> <p>Add “<b><i>and corrective action taken if parameters fall outside the optimum range</i></b>” at the end of the first sentence.</p>	Consider adding additional information to clarify.

m194	J Sanderson	A standard should be made that sets out absolute minimum levels of inspection for large commercial facilities.	For consideration.
m29b, m115a	RSPCA	The RSPCA recommends that [this] guideline become a standard. It is not covered by standard 7.1 because 7.1 does not specify daily monitoring and that birds should not suffer symptoms due to poor air	
m83, m173	B Van Elburg, M Chester	Upgrade to Standard.	
m147	Sentient	This should be a standard.	
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	
Guideline GA7.8			
m103	N Kratzmann	This should be combined with SA7.2 to develop a more comprehensive and coherent coverage of ventilation and temperature failures in sheds and remain a standard, not a guideline.	For consideration.
m83	B Van Elburg	Upgrade to Standard. An unacceptably high number of animals can die in shed within 15 minutes due to the intensive nature of the production system. If the community is expected to believe that the industry cares about the welfare of animals, it has have at least one individual appointed to provide 24hr supervision of the poultry within the sheds and therefore to take immediate action in case of system failure.	For consideration.
m65	Animals Aust	It is unacceptable these Guidelines are not Standards.	
m173	M Chester	Upgrade to a Standard.	

# Standards and Guidelines A8 Litter Management

## Key issues:

- Provision of litter for all species
- The need for testing for toxic components

## Section 8 Litter Management - General Comments

Submission Code	Submitter	Submission	Recommendation
m95	LIV	The LIV recommends an additional Standard SA8.4 be inserted which provides that where litter is used, a person in charge must manage litter to ensure that poultry can perform their natural behaviours, including foraging and ground scratching. The draft Standards in their current form do not ensure that the animals can perform these habitual activities.	For consideration.
m29b, m115a	RSPCA	The following guideline was deleted from a previous draft and should be re-inserted: GA8.1 <i>The floor of the shed should be completely and evenly covered in litter to a depth of at least 30mm depending on the material.</i>	For consideration.
m65	Animals Aust	These Standards need to be expanded to ensure that all poultry housed indoors have access to a littered area to allow birds to forage and dustbathe. The fact there is no litter provision in [conventional cages], is another reason we oppose their use.	For consideration.
m63	WAP	Recommend the following additional standard <a href="#">[see submission for explanation and evidence]</a> :  <i>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.</i>	Examine technical information provided within the submission.

m155, m110, m117	Dr D Evans, C Davis, J Kendall	Add a Standard that requires that all indoor housed poultry have access to appropriate litter to allow all birds to forage and dustbathe.	For consideration.
m38	ASFA	RSPCA has recommended the inclusion of a standard in Chapter 8 – Litter management that ensures all poultry housed indoors must have access to a littered area to allow birds to forage and dustbathe. We support this recommendation but add that this should be a temporary Standard until the housing of poultry is phased out in the next 10 years, with a view to all poultry systems becoming free range.	
Standard SA8.1			
m200	S Koh	Remove the phrase “ <i>where litter is used</i> ”.	Examine technical information provided within the submission re the provision of litter.
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend Standard: <b><i>Litter must be used for all poultry. A person in charge must ensure litter material is suitable for the species and of a good quality</i></b> <u>[uses the FBWSR as evidence in the submission]</u> .	
m29b, m115a	RSPCA	SA8.1 <del>Where litter is used, a</del> <b>A person in charge must ensure litter material is <i>of good quality, friable, and suitable for the species and of a good quality</i></b> . The draft standards previously included the above wording which was deleted, but all species have a need for good quality litter in order to be able to forage, dustbathe, and to prevent adverse foot conditions and behaviours such as severe feather-pecking which has serious negative consequences for both welfare and productivity.	
m93	HSI	<u>[Summarised. See full submission for technical information]</u> The draft does not state that litter should be provided to poultry in Australia in Chapter 8. Suitable litter is essential for birds to carry out some of their basic natural behaviours, namely dust bathing and foraging, which will enhance their welfare status. Dust bathing is an intricate body maintenance behaviour. Dust bathing is also an indicator of positive welfare. The provision of an enriched environment and loose foraging material, particularly in the pullet rearing system, can help prevent the development of feather pecking.	
m44	EPANSW	Supported.	No action required.

## Standard SA8.2

m200	S Koh	Remove the phrase “ <i>where litter is used</i> ”.	For consideration
m29b, m115a	RSPCA	<del>Where litter is used, a</del> <b>A person in charge must ensure litter is free of toxic agent contamination</b> <del>the risk of contamination of litter with toxic agents is minimal.</del>	For consideration.
m83, m173	B Van Elburg, M Chester	Amend Standard: <i>A person in charge must ensure the risk of contamination of litter with toxic agents is minimal.</i>	
m17	J Cordina, Cordina Chickens	Testing for litter for toxic agents is limited by the availabilities of diagnostic tests, cost and feasibility of testing ALL litter material used. The standard should be reworded.  <i>Where litter is used, a person in charge must <b>take reasonable measures to ensure the risk of contamination of litter with toxic agents is minimal.</b></i>	For consideration
m64, m66, m67, m68	ACMF, ACGC, Ingham’s Turkey, Ingham’s chicken	We strongly oppose this standard as worded. Testing a significant sample of 100% of all litter (a) received and (b) once in the shed for known toxic agents would be cost prohibitive. What about previously unknown or unheard of potential contaminants? This standard as it is written would require testing for every conceivable substance that could be toxic for chicken, irrespective of the risk, and there may not be tests even available for some potential contaminants. We therefore suggest that this standard to be reworded to make it clear that the action that needs to be taken to ensure the risk of toxic agents in litter is minimal should meet the criteria of “reasonableness”.  Suggested rewording: “ <i>Where litter is used, a person in charge must <b>take reasonable measures to ensure the risk of contamination of litter with toxic agents is minimal.</b></i> ”	
m44	EPANSW	Supported.	

## Standard SA8.3

m200	S Koh	Remove the phrase “ <i>where litter is used</i> ”.	For consideration.
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m17	J Cordina, Cordina Chickens	This standard should be rephrased to better reflect practicalities and difficulty of ensuring optimal litter under all circumstances. E.g. the word ‘avoid’ should be replaced by ‘minimise’.	Consider rewording.
m64, m66, m67, m68	ACMF, ACGC, Ingham’s Turkey, Ingham’s chicken	<p>We accept that litter management is extremely important in ensuring good poultry welfare outcomes. However, we oppose the current wording of this standard, as it is not possible to consistently avoid wet litter in all circumstances on all farms. For the majority of housing, the standard is achievable, but in some sectors (e.g. free range farms, and older shedding in some areas), the current facilities may not be able to achieve this consistently. To rectify this and comply would require infrastructure upgrades, particularly to the ventilation (e.g. retrofitting to tunnel ventilation) and/or removal and replacement of affected litter, and/or working of the litter (including the purchase of litter conditioning/tilling equipment), with the latter option often having negative impacts on bird welfare. This standard would impact most on free range farmers and farmers with older (and generally smaller) farms.</p> <p>This issue is simply addressed by replacement of the word “avoid” with “minimise”, as suggested in the alternative wording “<i>Where litter is used a person in charge must manage litter to <b>minimise</b> excessive caking, dustiness or wetness that impacts on the welfare of poultry</i>”</p>	
m144	Dr P Groves	Re: ‘excessive’ caking, dustiness or wetness, these terms are undefined to the extent of what ‘excessive’ means and leave the assessment open to judgment. How the ‘impact’ on the welfare of the poultry is determined as a result is also open to argument. I find this description extremely vague and the interpretation open to wide variation. As a Standard, this leaves the ‘person in charge’ liable to prosecution. The Standard needs to be defined more precisely. Obviously, being prescriptive here is difficult and perhaps this should be more appropriately covered under a Guideline.	Consider rewording or moving to guideline.
m83, m173	B Van Elburg, M Chester	Amend Standard: <i>A person in charge must manage litter to avoid caking, dustiness or wetness and must ensure that litter remains dry and friable.</i>	
m29b, m115a	RSPCA	The RSPCA recommends the addition of the following standard: SA8.3 All birds housed indoors must have access to at least 250 cm <sup>2</sup> of littered area per bird, the litter occupying at least one third of the ground surface, in order for birds to forage and dustbathe.	For consideration.
m44	EPANSW	Supported.	No action required.

## Guideline GA8.1

m147	Sentient	Litter should never be re-used at the end of a batch.	For consideration.
m65	Animals Aust	It is unacceptable that this Guideline is not a Standard given the huge numbers of birds being farmed indoors and the potential for litter related issues to adversely affect animal welfare. The community expects farmers to exercise a basic duty of care. It is not possible to comply with SA8.1 to SA8.3 without complying with GA8.1.	For consideration.

## Guideline GA8.2

m17	J Cordina, Cordina Chickens	Note this guideline does not apply to all species of poultry. Also, note in meat broilers, chick paper can be used to cover 100% of the brood area at bird placement, this is to reduce the risk of litter ingestion when the birds are young.	For consideration.
m39b	AVPA	Recommend removing this guideline, as it does not apply to all species of poultry.	
m200	S Koh	Remove the words “ <i>where appropriate</i> ”.	For consideration
m83, m173	B Van Elburg, M Chester	Upgrade to Standard: <i>Poultry housed indoors <b>must</b> have access to a littered area, the litter occupying at least one third of the ground surface in order for birds to forage and dust-bathe. Litter should be at a depth suitable to the species.</i>	For consideration
m147	Sentient	The provision of litter to allow birds to forage and dust-bathe should be compulsory, and therefore, a standard, not a guideline	
m65	Animals Aust	It is unacceptable that this Guideline is not a Standard.	

# Standards and Guidelines A9 Handling and Husbandry

## Key issues:

- Forced (induced) moulting
- Painful procedures including beak trimming

## Section 9 Handling and Husbandry - General Comments

Submission Code	Submitter	Submission	Recommendation
m95	LIV	The LIV does not support the draft Guidelines providing for induced moulting given that it affects the animal's physical wellbeing and welfare, including a loss to the animal's body mass.	For consideration.
m63	WAP	<p>[Summarised] WAP applauds many of the draft standards in this section but recommends the following additional standards <a href="#">[see submission for explanation and evidence]</a>:</p> <p>SA9.X A person in charge must not perform desnooding, detoeing, toe trimming, despurring, dubbing, pinioning and castration unless for therapeutic reasons.</p> <p>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.</p> <p>SA9.X A person in charge must breed poultry with consideration to a positive balance of welfare and production outcomes.</p> <p>SA9.X A person in charge must provide water up until catching and a maximum of 12 hours fasting pre-slaughter.</p>	Examine technical information provided within the submissions.
m34	Voiceless	Recommend amending Standards SA9.4, SA9.5 and SA9.6 to prohibit the practice of induced or forced moulting altogether.	



m65	Animals Aust	SA2.1 precludes forced or induced moulting – how is this permitted under SA 9.4-9.6?  The Standards need to reflect the weight of scientific evidence that induced or forced moulting must not be permitted given its adverse effects on animal welfare. Standards SA9.4 to SA9.6 must be rescinded and new Standards introduced to ensure that poultry are not forced to moult <u>[uses the FBWSR as evidence]</u> .	
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Remove SA 9.4-9.6, a complete ban on Induced Moulting is demanded. “The practice of moulting hens by removal or restriction of feed causes severe welfare problems of bird hunger, stress and unacceptable levels of mortality <u>[uses the FBWSR as evidence]</u> .”	
m59	Australian Ethical	Banning routine beak trimming and setting standards requiring infrared beak trimming where the procedure is unavoidable.	For consideration.
m29b, m115a	RSPCA	The RSPCA recommends the addition of the following standard:  SA9.3 A person must not handle birds, including loading for transport, showing signs of heat stress unless it is deemed necessary for their welfare	
m29b, m115a	RSPCA	Recommended addition (deleted from previous draft standards):  SA9.6 A person must have the relevant knowledge, experience and skills, or be under the direct supervision of a person who has the relevant knowledge, experience and skills to perform invasive procedures on poultry.	
m29b, m115a	RSPCA	There should be more standards around the practice of, and need for beak (and bill) trimming. This includes the selection of birds that have lower propensity to feather peck, optimising the environment to reduce the risk of feather pecking (and that beak trimming should only be performed when all other management techniques to reduce the risk of feather pecking have been implemented), and that beak-trimming should only be performed by experienced operators.	
Standard SA9.1			
m73, m39b	AVA, AVPA	Reword to say: <i>A person must manage and handle poultry in a manner that <b>prevents pain and injury, and minimises stress.</b></i>	

m100	L Hoiles	Suggestion to add ' <i>and that maximises the wellbeing and welfare of the bird</i> '	For consideration rewording to make more specific
m206	Darwalla	Pain and injury must not occur during routine handling. This should be reworded.	
m29b, m115a	RSPCA	Amend: <i>A person must manage, <del>and</del> handle, lift or carry poultry in a manner that <b>does not cause</b> <del>minimises</del> pain, stress or injury to birds. <b>Poultry must always be handled gently and with care.</b></i>	
m63	WAP	Additional to SA9.1: <i>Handling or carrying poultry by one leg, neck or wings must not occur.</i>	For consideration
m44	EPANSW	Supported.	No action required.
Standard SA9.2			
m44	EPANSW	Supported	No action required
Standard SA9.3			
m194	J Sanderson	Given 'reasonable' is not defined this makes for poor regulation-making ability. A time period that is reasonable should be given to ensure compliance (i.e. must be checked and freed if caught daily).	Consider rewording to make more specific.
m29b, m115a	RSPCA	Amend: <i>A person must free entrapped poultry <b>promptly and without delay</b> <del>at the first reasonable opportunity and if possible</del> <b>and take action</b> to prevent this situation from recurring.</i>	
m147	Sentient	It is unacceptable that animals should be trapped. Delete "if possible" as this situation should always be prevented from occurring. The current point contradicts points SA9.1 and SA9.2.	
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend Standard: <i>A person must free entrapped poultry <b>without delay and prevent this situation from recurring.</b></i>	
m44	EPANSW	Supported.	

## Standard SA9.4

m10	ADO	This standard requires that 'induced moulting is not routinely practiced'. The ADO submits that induced moulting is widely regarded as inhumane and should be banned. Recommendation: that the word 'routinely' be removed from SA9.4 so that 'induced moulting' is not accepted under the poultry standards and guidelines. This would also require the removal of SA9.5–6.	Refer to submissions for detailed technical information.
m147	Sentient	Delete 'routinely'. Induced moulting should never be practised because it denies birds access to food or water for significant periods of time in order to extend the laying cycle, yet birds require access to food at least every 12 hours and preferably ad libitum.	
m73	AVA	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).	
m100, m110, m117, m194	L Hoiles, C David, J Kendall, J Sanderson	Should be removed as no birds should have to undergo induced moulting.	
m65	Animals Aust	Standard must be rescinded and new Standards introduced to ensure that poultry are not forced to moult.	
m59	Australian Ethical	Banning forced moulting. Deliberately subjecting animals to a period of high stress by withdrawing food and water is cruel. The benefit of increased production is outweighed by the harm caused to the animals.	
m29b, m115a	RSPCA	Suggested amending following standard: SA9.4 <i>A person in charge must ensure that induced moulting is not <del>routinely</del> practiced.</i>	
m38	AFSA	We support the RSPCA's recommendation that Standards be introduced to ensure that poultry are not forced to moult.	
m155	Dr D Evans	Amend Standard 9.4 by removing 'routinely ' to state...induced moulting is not practiced.	

m34	Voiceless	Voiceless recommends amending Standard prohibit the practice of induced or forced moulting altogether.	
m83, m173	B Van Elburg, M Chester	Remove SA 9.4-9.6, a complete ban on Induced Moulting is demanded <u>[uses the FBWSR as evidence]</u> .	
m44	EPANSW	Supported	No action required.
Standard SA9.5			
m100	L Hoiles	Should be removed as no birds should have to undergo induced moulting	Refer to submission for detailed evidence.
m194	J Sanderson	Induced moulting should not be used at all.	
m34	Voiceless	Voiceless recommends amending Standard to prohibit the practice of induced or forced moulting altogether.	
m83, m173	B Van Elburg, M Chester	Remove. A complete ban on Induced Moulting is demanded <u>[uses the FBWSR as evidence]</u> .	
m65	Animals Aust	Standard must be rescinded and new Standards introduced to ensure that poultry are not forced to moult.	
m29b, m115a	RSPCA	Suggest deleting Standard.	
m51	McLean Farms	<i>A person in <b>charge</b> must ensure poultry are in adequate physical condition to endure an induced moult if necessary.</i> Typo	Fix typographical error
m44	EPANSW	Supported.	
Standard SA9.6			
m100	L Hoiles	Should be removed as no birds should have to undergo induced moulting	For consideration

m73	AVA	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).	Refer to technical information provided in submissions
m34	Voiceless	Voiceless recommends amending Standard prohibit the practice of induced or forced moulting altogether.	
m83, m173	B Van Elburg, M Chester	Remove, a complete ban on Induced Moulting is demanded <u>[uses the FBWSR as evidence]</u> .	
m65	Animals Aust	Standard must be rescinded and new Standards introduced to ensure that poultry are not forced to moult	
m194	J Sanderson	SA9.6, 3): This standard is made useless if body weight measurement is not needed before someone is inducing a moult	Refer to technical information provided in submissions.
m29b, m115a	RSPCA	Suggest deleting Standard	
m93	HSI	HSI recommends section SA9.6 of the draft should be revised to specify that poultry induced to moult only lose a maximum of 15% of their body weight, and not 25%, as diets that produce a lower body weight loss can be just as effective <u>[supporting technical information provided]</u> .	
m44	EPANSW	Supported.	No action required.
Standard SA9.7			
m83	B Van Elburg	Amend Standard: <i>A person in charge must ensure that where wing and leg bands are used, they are checked <b>daily</b> and where necessary, loosened or removed.</i>	For consideration.
m44	EPA NSW	Supported.	No action required.
Standard SA9.8			
m100	L Hoiles	Suggestion that NO person should perform pinioning or devoicing of any poultry.	For consideration

m200	S Koh	Pinioning, castration and devoicing should not be allowed.	
m29b, m115a	RSPCA	Recommended revision: <i>A person <del>other than a veterinarian</del> must not perform pinioning, castration or devoicing, on poultry.</i>	
m44	EPANSW	Supported. It is noted that NSW Department of Industry Guidelines under the <i>Exhibited Animals Protection Act 1986</i> already prevents pinioning except in the presence of a veterinarian when under three days of age or by a veterinarian at any older stage. It could be extrapolated that these guidelines therefore already apply to ducks and geese kept for exhibition (show) purposes.	For consideration.
m39b	AVPA	See comments relating to devoicing, castration and pinioning under Option G. Devoicing and castration of commercial poultry should not be permitted. Veterinarians, under anaesthetic with appropriate analgesia, may perform castration or devoicing on individual or backyard poultry. However, these procedures must be justified on animal welfare grounds. Pinioning is justified for pheasants only on welfare grounds.	
m73	AVA	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.	
m108	SA Poultry Assn	We recommend that pinioning be transferred to SA9.10.	For consideration.
m99, m80, m166	Exhibition poultry submitters	Pinioning is performed in order to prevent some breeds from flying & escaping and therefore breeding with wild waterfowl. Due to the limited availability of suitably experienced Veterinarians in Australia, we would suggest pinioning be performed by experienced personnel if under 3 days of age, or by a veterinarian if older than 3 days.	
m138	J Weaver	I would have thought pinioning would be desirable where bantam breeds of waterfowl are kept near wild ducks as they can cross breed. Maybe if the wording for this was changed to say 'Pinioning only at less than 3 days by an experienced person or otherwise a vet'?	

## Standard SA9.9

m100	L Hoiles	Remove this and [have] that animals are instead kept in a way that means aggressive behaviour is minimised.	For consideration.
m200	S Koh	Desnooding, dubbing and desprurring should not be allowed.	For consideration
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Remove SA9.9-9.11 and replace with Standard. <i>A person must not perform desnooding, dubbing, <b>desprurring, toe trimming and web marking on poultry unless undertaken by a veterinarian</b> [uses the FBWSR as evidence].</i>	For consideration
m34	Voiceless	Voiceless notes that the proposed S&G permit the practice of desnooding for reasons other than cosmetic purposes. This procedure is intended to reduce injuries that turkeys may sustain from fighting, which usually occurs as a consequence of high stocking densities. As an invasive mutilation procedure that potentially causes pain and stress, Voiceless strongly recommends that a Standard be introduced to expressly prohibit the practice of desnooding, or at the very least strictly limit any de-snooding to be performed only in exceptional circumstances or for therapeutic reasons, when all other natural farm management methods have been exhausted, and only by an accredited operator and with the provision of pain relief.	For consideration.
m39b	AVPA	These are technical terms, which should be defined in the glossary.	Recommend inclusion in the glossary (see Glossary)
m29b	RSPCA	There should be a standard added:  Where dubbing is performed, it must be performed by poultry veterinarians with sufficient experience, or accredited operators, using anaesthetics, anticoagulants and antibiotics.	
m44	EPANSW	Supported. EPANSW Inc's executive supports this standard in principle and has recently asked that members consider a five-year plan to meet it. It is noted, however, that a number of individual members and three member clubs do not support it.	For consideration.

## Standard SA9.10

m39b	AVPA	These are technical terms, which should be defined in the glossary.	Recommend inclusion in the glossary (see Glossary).
n3	M Fletcher	Can the inhumane practice of dubbing please be stopped?	For consideration.
m200, m83, m100	S Koh, L Hoiles, B Van Elburg	Desnooding, dubbing and desprurring should not be allowed and animals should be kept in a manner to avoid or reduce aggression	For consideration.
M73	AVA	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.	For consideration.
m147	Sentient	These must be treated as surgical procedures, performed under anaesthesia by a veterinarian, with long term pain relief.	For consideration
m173	M Chester	Remove SA9.9-9.11 and replace with Standard: <i>A person must not perform desnooding, <b>dubbing</b>, <b>desprurring</b>, <b>toe trimming</b> and <b>web marking</b> on poultry unless undertaken by a veterinarian.</i>	
m76, m186, m183, m184, m181, m202, m178, m78, m84, m80, m71, m99, m91, m14, m166, m165, m132, m133, m62	Exhibition poultry submitters	Exhibition poultry fanciers feel dubbing improves animal welfare. Dubbing 1-day old hatchlings can disturb the hen and result in poor welfare for chicks, so suggest amending the standard <i>to carried out on fowl up to 16 weeks of age by an experienced person</i> . At 1 day old, chicks cannot be accurately sexed and females do not require dubbing, thus 50% would be dubbed unnecessarily. They also believe web marking is an important part of record keeping and disturbing hens by web marking chicks may cause chick welfare issues thus should be allowed up to 7 days to web mark chicks. Some were willing to undergo training or education of practices to update or certify competency.	Consider an exemption or similar for exhibition breeders.
m108	SA Poultry Assn	<i>A person must only perform <b>pinioning</b>, desnooding, dubbing, desprurring and web marking on day old hatchlings selected as potential breeders.</i>	



m44	EPANSW	Supported in principle relating to desnooding, dubbing and despurrring. In relation to toe marking, some breeders perform this on day old chicks when hatched in incubators and slightly older chicks hatched naturally. Veterinary advice is that there is minimal bleeding from this practice and that it is therefore appropriate. Desnooding, dubbing and despurrring on day old chicks are not possible in the exhibition fancy given that there is no capacity to sex at day old. Surgical dubbing performed at a later date would be carried out under standard SA9.12.
m116	M Ryan	If you dub a bird at day old will the comb grow back. The comb hasn't begun to grow! Experienced hands and surgical scissors provide little discomfort to a young cockerel.
m78	E Vaughan	<p>Exhibition poultry should be exempt from this standard. Dubbing of day old chicks would be detrimental to the welfare of day old chicks as:</p> <ul style="list-style-type: none"> <li>A. The wound would be a catalyst for attack and predation by other chicks and potentially the broody hen where hens are used as the heat source.</li> <li>B. Significant numbers of female chicks would be unnecessarily dubbed as females do not get dubbed.</li> <li>C. Given the statistics 50% of chicks are female and do not require dubbing and would be unnecessary.</li> <li>D. Allowing the remaining 50% to develop to say 16 weeks would allow the natural culling of unsuitable birds which would further reduce the number to be dubbed.</li> <li>E. Cockerels chosen for the show pen are cared for extremely well with treatment for internal and external parasites.</li> <li>F. Cockerels that are dubbed are isolated and given the utmost care to ensure a speedy recovery every care is taken to ensure the birds welfare.</li> </ul> <p>The Australian pit game club have been sponsoring a peacomb project to reduce the number of birds that need to be dubbed. The peacomb project is a WORK IN PROGRESS and will take a number of years before we can safely say we have achieved our goal.</p> <p>There are a number of health issues to be considered with the extremes within our country the occurrence of frost bite and sunburn to the combs can be quite harmful to the birds. Older breeding males will suffer from oversized combs that will render them unable to feed or mate.</p>
m14	C Jones	Exhibition poultry focuses on achieving and maintaining a recognised Australian Poultry Standard (APS). In the event that dubbing birds is no longer an option, at day old or otherwise, members ask any breeds affected by such a ruling be given a spaced implementation to coincide with the update and release of the next version of the APS.

m138	J Weaver	Fanciers <b>do not</b> need to dub roosters. People's attitudes will change and maybe the breed will be better off for it, only time will reflect that. The comb, wattles etc are described in the standard already and there are breeds with almost no facial decoration such as the Asil. It is only one breed that is dubbed (Old English Game) [and] there are several other breeds in a similar category and none of them are dubbed.	
Standard SA9.11			
m83, m173	B Van Elburg, M Chester	Remove SA9.9-9.11 and replace with Standard-A person must not perform desnooding, dubbing, despurring, toe trimming and web marking on poultry unless undertaken by a veterinarian.	For consideration.
m147	Sentient	Furthermore, these must be treated as surgical procedures, performed under anaesthesia by a veterinarian, with long term pain relief.	
m200	S Koh	Toe trimming should not be allowed, for the same reason that declawing of cats is not acceptable. Nail clipping can be done instead.	For consideration.
m66, m67, m81	Ingham's Turkey, Ingham's Meat Chicken, ATF	<p>Toe trimming is a measure that has on balance some animal welfare benefits when applied in a judicious manner and in a way that aims not to remove more than the toenail. The new wording attempts to capture this more restricted application of this technique so as to optimize the animal welfare outcome.</p> <p>Proposed wording: <i>A person must only perform toe trimming on day old hatchlings selected as potential breeders, except:</i></p> <ul style="list-style-type: none"> <li>• for emus and ostriches which may have toes trimmed on commercial stock up to 5 days of age</li> <li>• 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 aim not to remove more than the toenail up to and including the nail bed.</li> </ul> </li> </ul>	
m39b	AVPA	Toe-trimming of day-old turkeys should be included as an exception to this standard. This practice is justified and may be required in order reduce mortality and morbidity associated with back scratching in this species.	
M44	EPANSW	Supported but potentially not applicable to exhibition breeders.	

m138	J Weaver	Toe punching is practiced by 90% of breeders in the fancy, it would be the best identification tool used. It does no harm if done on day of hatch; there is no blood or reaction from the chicken; less stressful than catching the chicken.	
Standard SA9.12			
m200	S Koh	Amend - <i>All surgical procedures should be done by a vet.</i>	For consideration
m83	B Van Elburg	Amend Standard- <i>A person must use appropriate pain relief when carrying out surgical procedures on poultry and provide appropriate pain relief after the procedure.</i>	For consideration (in light of issues with pain relief highlighted below)
m34	Voiceless	At the very least, pain relief must be provided in accordance with the OIE principle that 'where painful procedures cannot be avoided, the resulting pain should be managed to the extent that available methods allow' [RIS, p17]. A failure to require the use of pain relief would contradict Standard SA9.12, which requires a person to use appropriate pain relief when carrying out surgical procedures on poultry.	
m144	Dr P Groves	Requires pain relief to be used during surgical procedures. Practices like desnooding, dubbing, despurring, web marking and toe trimming practised on day old hatchlings are covered in SA 9.9 through 9.11 which could be construed to constitute 'surgical procedures'. Are these defined procedures excluded under SA 9.12? If so, this should be specified clearly.	Clarify 'surgical' procedures and note lack of registered pain relief products for poultry
m76, m184, m186, m181, m84, m80, m71, m99, m39, m166, m165, m91, m133	Exhibition poultry submitters; AVPA	It is unclear as to what a surgical procedure is defined as. There is also no registered veterinary product registered for pain relief. Using products off-label may be problematic.	
m44	EPANSW	Supported although it is noted that there is no topical pain relief specifically registered through the APVMA for use on poultry. This means that any use would have to be under veterinary prescription which may mean it is too costly for the average hobbyist.	

## Standard SA9.13

m68, m17, m39b	AVPA; J Cordina, Cordina Chickens; ACGC	<p>Amend - <i>A person must not pluck live poultry, <b>other than removal of small areas of feathers for the purposes of collection of diagnostic samples or for diagnostic testing</b></i></p> <p>For the purposes of monitoring flock health, poultry veterinarians sometimes need to remove some feathers from birds to obtain a diagnostic sample for testing, or to apply a diagnostic test. Monitoring flocks for evidence of disease exposure is an essential tool in managing the overall health and welfare of individual flocks and protecting the national poultry flock more broadly. An exception to this standard needs to be made for the removal of small areas of feathers from birds for this purpose.</p>	Consider exemption for removal of feathers for diagnostic testing under veterinary advice
m144	Dr P Groves	Prohibits plucking of live poultry. Does this include the removal of some feathers near the brachial or jugular veins to facilitate venepuncture for blood sample collection or intravenous injection? This is a common veterinary procedure during diagnostic testing.	
m44	EPANSW	Strongly supported in principle. Should be extended to explicitly refer to machinery as well as persons. Should clarify whether plucking small amounts of feather around vent to aid breeding is exempt.	For consideration

## Standard SA9.14

m100, m200, m83	L Hoiles, S Koh, B Van Elburg	Remove as beak trimming should not be necessary, if animals are kept in appropriately, natural conditions.	For consideration.
m110, m117	C Davis, J Kendall	This practice must be banned on the grounds of cruelty.	
m50, m173	L McKenna, M Chester	Proposed amendment: <i>A person must not perform beak trimming unless under veterinary advice.</i>	For consideration.
m147	Sentient	The beaks of poultry must not be routinely trimmed. This procedure should only occur under exceptional circumstances, for medical reasons, and must be performed under anaesthesia by a veterinarian, with long term pain relief.	

m65	Animals Aust	Beak trimming is a painful procedure that must only be used as a last resort to combat injurious pecking and must be restricted to day old chicks using [infra-red] and not [hot blade] techniques. Research into benign beak blunting techniques is needed (as well as management of the underlying reasons for [injurious pecking]). SA9.14 and SA9.15 give free rein to the continuance of this practice. If beak trimming must be performed, pain relief must be used [ <u>uses the FBWSR as evidence</u> ]. The humane answer to the [injurious pecking] problem is not beak trimming but rather to manage the underlying factors that predispose to this practice.	For consideration.
m38	AFSA	We support the RSPCA's recommendation that stricter standards must be introduced around beak and bill-trimming to ensure that it is not performed unless necessary for animal welfare reasons, and it is performed appropriately, with minimal impacts on the birds.	
m73	AVA	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.).	For consideration.
m61	SBA	SBA believes this should be reworded to incorporate a clear standard for training. As an example – <i>A person must have the relevant knowledge, experience and skills, and use appropriate tools and methods to trim the beaks of poultry.</i>	Consider specifying appropriate training and tools within the Standards.
m189	S Kay	SA9.14 <i>A person must use the 'appropriate tools and methods' to trim the beaks of poultry.</i> What are these? The Guidelines provide details of the appropriate tools and methods, so why are these not specified in the Standards?	
m44	EPANSW	Supported.	No action required.
Standard SA9.15			
m100, m200, m83	L Hoiles, S Koh, B Van Elburg	Suggestion to be removed as beak trimming should not be necessary, if animals are kept in appropriately, natural conditions.	For consideration.

m50, m173	L McKenna, M Chester	Proposed amendment: <i>A person must not perform beak trimming unless under veterinary advice.</i>	For consideration.
m65	Animals Aust	If beak trimming must be performed, pain relief must be used <u>[uses the FBWSR as evidence]</u> . The humane answer to the IP problem is not beak trimming but rather to manage the underlying factors that predispose to this practice	For consideration
m20b	Glatz and Runge	[Summarised. <u>See extensive technical information provided in full submission</u> ]  It is critical that a separate guideline for IRBT (infra-red beak trimming) and [hot blade] trimming be included in the new code for beak tipping. If one one-third of the beak is treated using the IRBT method the beak will grow back and birds will commence serious cases of feather pecking and cannibalism.	Examine evidence presented in full submission for changes to SA9.15 and new standard for IRBT.
m39b	AVPA	This standard to be clarified by adding 'by hot blade method'. The infrared beak treatment technology results in treatment of more than 1/3 of the beak (up to 40%). When the infrared treated portion of the beak regrows, the trim may be only 20%.	
m197	PROOF	Together, this standard and related glossary definition are misleading and deceptive. If it is permissible under the Standard to remove one third of both the upper and lower beaks, the glossary definition must reflect this. The current definition would serve to deceive consumers as to the welfare status of the birds.	For consideration.
m44	EPANSW	Supported	No action required.
Standard SA9.16			
m56a	Name withheld by request	[Summarised. see full submission] This is an absurd stipulation at odds with the goals of improving poultry welfare. Game bird/specialist breed keepers find items essential, know how to use them, may not be able to access appropriate veterinary advice easily. I doubt game bird keepers have been considered with respect to this stipulation. Veterinarians already have competitive advantages over equipment suppliers. Either the very effective techniques will go underground or be abandoned leaving effected birds with no proper solution to mitigate or stop aggressive feather pecking. Introducing an additional cost and logistically-difficult rule that Vets be consulted reduces the chance that producers and hobbyists will be able to quickly attend to a problem.	For consideration.

m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend Standard: <i>A person must not use blinkers or contact lenses on poultry.</i>	For consideration.
m44	EPANSW	Supported	No action required.
Standard SA9.17			
m44	EPANSW	Supported	No action required.
Standard SA9.18			
m194	J Sanderson	‘Regularly’ needs to be defined for coherent regulations around the country.	Consider incorporating additional clarifying information into the Standard.
m39b	AVPA	As soon as possible’ should be replaced with ‘as soon as they are identified’.	
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend Standard- <i>A person must monitor incubators at regular intervals during hatching and hatchlings that are found outside the trays must be returned to the tray or placed in brooders <b>immediately upon identification and without delay.</b></i>	
m44	EPANSW	Supported.	No action required.
Standard SA9.19			
m64, m66, m67	ACMF, Ingham’s Turkey, Ingham’s chicken meat	The intention of this standard is for anything that might be ‘alive’, including embryos, to be quickly and effectively killed. That is reasonable. However, hatchery waste includes waste from a number of areas in the hatchery which are often ultimately comingled. This includes infertile eggs, which means eggs that have no living embryos in them. These are usually detected and removed at transfer (from the incubator to the hatcher) at 18 days of incubation, in the case of chickens. There should be no requirement to “treat” this waste stream (at least from an animal welfare perspective) as there is no animal or embryo involved. An	For consideration.

		<p>exclusion from this standard needs to be made for infertile eggs, and a suggested wording that achieves this is provided.</p> <p><i>“A person must treat hatchery waste, including unhatched embryos <b>but excluding infertile eggs removed at transfer</b>, quickly and effectively to ensure the rapid killing of all unhatched embryos”</i></p>	
m44	EPANSW	Supported.	No action required.
Standard SA9.20			
m100	L Hoiles	Suggestion to remove as no hatchlings should be killed.	For consideration
m110, m117	C Davis, J Kendall	The practice of macerating or gassing male chicks should be banned. New technology is available to end this horrific practice.	
m200	S Koh	Replace “are killed” with “are humanely killed”.	Consider incorporating additional clarifying information into the Standard
m29b, m115a	RSPCA	Recommended revision: <i>A person in charge must ensure cull or surplus hatchlings awaiting disposal are treated humanely, <b>handled gently</b>, and are killed as soon as practicable <b>using a humane and rapid method</b>.</i>	
m50, m173	L McKenna, M Chester	Proposed amendment: <i>A person in charge must ensure cull or surplus hatchlings awaiting disposal are treated humanely and are killed <b>without delay</b>.</i>	
m147	Sentient	‘As soon as practicable’ is far too subjective. Change to ‘immediately’. Furthermore, industry should be researching and introducing techniques to identify the sex of chickens before they hatch, in order to prevent hatching and the currently used inhumane forms of culling (whether by grinding or suffocating).	
m83	B Van Elburg	Amend Standard: <i>A person in charge <b>must have the appropriate qualifications from nationally accredited provider</b> and must ensure cull or surplus hatchlings awaiting disposal are treated humanely and are killed <b>without delay</b>.</i>	
m44	EPANSW	Supported.	No action required.



## Guideline GA9.1

m200	S Koh	Add “likelihood of aggression”.	For consideration.
m147	Sentient	This should be a standard. Furthermore, maximum stocking densities should be specified that permit appropriate social interactions, including the ability for birds to escape bullying, and should allow sufficient individual space and unhindered access to food and water. This translates to a minimum of 5000cm <sup>2</sup> per bird, and may be achieved in larger housing systems with low stocking densities or more ideally, within smaller communities. Stocking densities must never exceed 1500 birds per hectare for free range systems and 24kg per square metre for barn systems.	For consideration.

## Guideline GA9.2

m200	S Koh	Add “likelihood of aggression”.	For consideration.
m83, m173	B Van Elburg, M Chester	Upgrade to a Standard.	For consideration.

## Guideline GA9.4

m10	ADO	Recommendation: that the guideline in GA9.4 be removed and included in the standards in section 9 so that carrying 4 or more birds in each hand is not accepted under the poultry standards and guidelines.	For consideration.
m194	J Sanderson	This should be a standard and even so the number is inappropriately high. This document is for improving and regulating welfare.	
m100	L Hoiles	Suggestion that the number of birds in each hand be reduced to one,	For consideration.
m17	J Cordina, Cordina Chickens	There are numerous variable such as age and size of poultry, that may vary the maximum number of birds allowed per hand.	For consideration.

m200	S Koh	How does a person carry 4 birds in each hand without harming the bird, unless they are chicks? Poultry should not be carried by their legs/feet, particularly broilers which have small fragile legs compared to their body weight. This also depends on the species. The guideline is stupid and vague, remove and add into guidelines for each species.	For consideration.
m83, m173	B Van Elburg, M Chester	Replace GA 9.4 and GA9.6 with Standard [see GA9.6].	For consideration.
Guideline GA9.5			
m200	S Koh	The wording “enable them to land normally” means that a person can throw a bird to the ground even if it doesn’t land on its feet. Change to “from low heights such that they land on their feet.”	Consider rewording.
m29b, m115a	RSPCA	Poultry, and particularly broilers, should not be dropped from any height. All birds should be released by setting them down gently on their feet and not thrown or dropped.  Recommended revision: <i>Poultry should be released by setting them down on their feet <del>or from low heights that enable them to land normally, feet first.</del> Avoid releasing in such a way that requires flying.</i>	
m147	Sentient	Change ‘avoid’ to ‘do not’.	
Guideline GA9.6			
m29b, m115a	RSPCA	Should be standard.	For consideration
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Replace GA 9.4 and GA9.6 with Standard: <b><i>Mechanical catchers must be used instead of Manual catchers. Mechanical catchers must be designed, operated and maintained to prevent injury, stress and fear to birds. A contingency plan must be available in case of mechanical failure.</i></b>	

### Guideline GA9.7

m29b, m115a	RSPCA	Move to standard.	For consideration.
m83, m50, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard: <i>Poultry that are identified as unfit or injured before or during the catching procedure <b>must</b> be killed immediately, in accordance with species specific Standards in Part B. The person carrying out the killing must have the relevant qualifications under a nationally accredited scheme.</i>	

### Guideline GA9.8

m194, m83	J Sanderson, B Van Elburg	Should be a standard. This number [40cm] is too high for day old chicks.	For consideration.
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### Guideline GA 9.9

m144	Dr P Groves	Recommends maintaining sex ratios in breeders to ensure there is not 'excessive' aggression. This is a very variable behaviour and difficult to assess. It is an important factor for consideration, however, as incorrect ratios can lead to injury and mortality as well as depressing fertility and egg production. An unambiguous definition of 'excessive' should be included in the Glossary.	For consideration.
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### Guideline GA9.10

m100	L Hoiles	Suggestion that this clause is removed, as cutting of wing feathers should NOT be performed.	For consideration.
m83, m173	B Van Elburg, M Chester	Amend and upgrade to Standard- Cutting of feathers including the wing feathers from live birds should only be carried out by a person who is accredited by a nationally recognised scheme [and under the advice of a veterinarian – added by m83]	For consideration.

## Guideline GA9.12

m65	Animals Aust	It is unacceptable these Guidelines are not Standards given the huge numbers of birds being farmed and the strong evidence that beak trimming impacts negatively on animal welfare.	For consideration.
m83, m173	B Van Elburg, M Chester	Upgrade to standard.	
m100	L Hoiles	Suggestion that these are removed and that ONLY therapeutic beak trimming is allowed.	For consideration.
m200	S Koh	Beak trimming should not be allowed.	For consideration.

## Guideline GA9.13

m200	S Koh	Beak trimming should not be allowed.	For consideration.
m100	L Hoiles	Suggestion that these are removed and that ONLY therapeutic beak trimming is allowed	For consideration.
m173	M Chester	Upgrade to a Standard	
m83	B Van Elburg	Amend and upgrade to Standard- Beak trimming must only be carried out under veterinary advice and must be done using the most humane available technology within 3 days of hatching. Pain relief must be provided during and after the procedure	

## Guideline GA9.14

m200	S Koh	Beak trimming should not be allowed.	For consideration.
m50, m83, m173	L McKenna, B Van Elburg, M Chester	Amend and upgrade to Standard: <i>If therapeutic beak trimming is required <b>under veterinary advice</b>, it should be carried out by <b>personnel accredited under a nationally recognised scheme, within three days of hatching</b></i>	For consideration.

		<i>and care must be taken to remove the minimum amount of beak necessary using a method which minimises pain and controls bleeding.</i>	
m73	AVA	Hot blade beak trimming in hatcheries – infra-red at day old is preferred  Routine 2nd 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.)	For consideration.
m144	Peter Groves	‘Therapeutic’ beak trimming suggests that this is done only as a treatment where a flock is experiencing a problem. In most cases it is performed preventatively for flocks destined for operations with a known risk for injurious feather pecking or cannibalism. To my knowledge this would include nearly all free range layer farms. Injurious feather pecking and cannibalism can occur in any management system It is more easily managed in cages (mainly by control of light intensity) but it is difficult in the more extensive systems. Beak trimming is seldom used in the field once an outbreak of injurious pecking occurs due to the handling and impact on the adult birds, hence the use of beak trimming other than at day old is restricted to mid-rearing (10-11 weeks) as a prevention. Clarification as to what ‘therapeutic beak trimming’ refers to in this guideline is needed.	For consideration.
m95	LIV	The LIV submits that draft Standards SA9.14 and SA9.15 should be more specific about ‘appropriate tools’ and ‘methods’ that can be used to trim the beaks of poultry.	For consideration.
<b>Guideline GA9.15</b>			
m200	S Koh	Beak trimming should not be allowed.	For consideration.
m83, m173	B Van Elburg, M Chester	Upgrade to standard.	For consideration.

## Guideline GA9.16

m103	N Kratzmann	Need to restrict routine use of induced moulting. This is purely a tool for inefficient management. I can state categorically that banning induced moulting is absolutely required. I say this from my experience and am shocked when I have met poultry farmers who say we must have this as a management tool. If the layer poultry industry is allowed to use the three exceptional circumstance rules for induced moulting, the industry will deserve any criticism levelled at it.	For consideration.
m65	Animals Aust	It is unacceptable that GA9.16 permits induced moulting for purely economic reasons and GA9.17 “misses” the fact there are already genetic lines of birds with longer laying periods.	
m83, m173	B Van Elburg, M Chester	Remove GA9.16. Induced moulting must not be permitted under any circumstances.	

## Guidelines GA9.17

m50, m83, m173	L McKenna, B Van Elburg, M Chester	Remove GA9.17, Induced moulting must not be permitted under any circumstances.	For consideration.
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## Guidelines GA9.19

m200	S Koh	This makes no sense whatsoever. How can unhatched eggs be killed within the day of hatch, if they haven’t hatched??	For consideration.
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## Guidelines GA9.20

m34	Voiceless	Guideline GA9.20 addresses a core and basic element of hatchling protection and should be converted to a Standard so that hatchling trays with live young birds must be moved smoothly, and tipped in such a way that the birds do not pile or become trapped.	For consideration
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m83, m173	B Van Elburg, M Chester	Amend and upgrade to Standard: <i>Hatching trays with live young birds should be moved smoothly. Trays <b>must not be</b> tipped to remove chicks.</i>	
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# Standards and Guidelines A10 Humane Killing

## Key issues:

- Humane killing protocols
- Allowing for mass depopulation protocols
- Definitions of ‘reasonable’ and ‘competence’

## Section 10 Humane killing - General Comments

Submission Code	Submitter	Submission	Recommendation
m95	LIV	The LIV submits that the Standards in Chapter 10 and 11 are inadequate to protect animal welfare. The Standards providing for the humane killing of the animals and slaughtering establishments need to be stricter to ensure that animal welfare is protected by increasing specificity and including the Guidelines as Standards to ensure that they are enforceable.	For consideration.
m63	WAP	<p>WAP recommends the following additional standards <a href="#">[see submission for explanation and evidence]</a>:</p> <p><i>SA10.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.</i></p> <p><i>SA10.X Cervical dislocation and manual blunt trauma must not be used for birds greater than 3 kg body weight.</i></p> <p><i>SA10.X Equipment that crushes the neck and methods of cervical dislocation that require spinning or flicking of the bird by the head are prohibited.</i></p>	DG to examine technical information provided within the submission.



		SA10.X Gas or electrical methods must be used only with certified training and compliance.	
m29b, m38	RSPCA, AFSA	The RSPCA also strongly recommends that unacceptable methods be included in the standards. This includes mass killing by ventilation shut down, improper cervical dislocation methods, crushing the neck, and any methods which include a risk of smothering.	For consideration
m17, m39b	AVPA; J Cordina, Cordina Chickens	Standards SA10.1-SA10.4: Mass depopulation methods should be permitted in the event of a disease outbreak with appropriate decision making. Whilst these may not easily be defined, there may need to be some leniency to enable appropriate decision making under these circumstances.	Consider the need for additional information on mass depopulation for disease control
Standard SA10.1			
Submission Code	Submitter	Submission	Recommendations
m29b, m115a, m34	RSPCA Voiceless	Recommended revision: <i>A person in charge must ensure killing methods for poultry result in rapid death, or <b>rapid</b> loss of consciousness, followed by death while unconscious.</i>	For consideration.
m95	LIV	In particular, the LIV is concerned that draft Standard SA10.1 and SA10.2 would be difficult to enforce and do not provide the animal with sufficient protection from harm.	For consideration
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	
Standard SA10.2			
m182	Dr L Hewitt	Should also refer to competency (for consistency with SA1.2). Where a competent person is not available and the bird is suffering, the method/technique used still needs to meet SA 10.1 (ie. immediate loss of consciousness/death). Definition of ‘unreasonable delay’ is required.	Consider making terms in this standard more specific

m29b, m115a	RSPCA	<p>Recommended revision: <i>A person must have the relevant knowledge, experience and skills to be able to humanely kill poultry, or be under the direct supervision of a person who has the relevant knowledge, experience and skills <b>at all times</b>, unless:</i></p> <p><i>1) the poultry are suffering and need to be killed to prevent undue suffering; and</i></p> <p><i>2) there is an unreasonable delay until direct supervision by a person who has the relevant knowledge, experience and skills becomes available.</i></p> <p>The exception is unacceptable and really needs to be clarified. RSPCA is aware that this standard was written to accommodate backyard poultry, in cases where there may not be a vet or competent person readily available. However, as the standard currently reads, there is the possibility for many birds, even in commercial conditions, to be killed by incompetent people on a regular basis, since the standard is very vague. Poultry should never be killed by an incompetent person. Any person who has full responsibility over birds and who may experience delay in a skilled person becoming available, needs to be competent in humane killing, and able to do so quickly and without causing pain or distress to the bird.</p> <p>If a standard similar to this remains, it needs to be much more specific, and detail that only in backyard situations where a bird is in an immediate state of suffering and there are no people available with relevant knowledge, and certain methods which may be used should be specified.</p>	especially with respect to competency.
m44	EPANSW	Supported, although clarification of what the relevant knowledge, experience and skills comprises might be useful	
m95	LIV	In particular, the LIV is concerned that draft Standard SA10.1 and SA10.2 would be difficult to enforce and do not provide the animal with sufficient protection from harm.	For consideration
m65	Animals Aust	Acceptable.	No action required.
Standard SA10.3			
m182	Dr L Hewitt	SA 10.3 Definition of 'reasonable opportunity'	Define 'reasonable opportunity' or consider revising to without delay
m173	M Chester	Replace 'first reasonable opportunity' with 'without delay'.	

m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	
Standard SA10.4			
m100	L Hoiles	Suggestion to amend to ‘all reasonable and humane actions’	For consideration.
m173, m182	M Chester, Dr L Hewitt	Remove the word ‘reasonable’. Person killing or the supervisor of the person killing (if they are not deemed competent).	For consideration.
m65	Animals Aust	Acceptable.	No action required.
Guidelines GA10.1			
m182	Dr L Hewitt	For both killing of individual birds and whole flock destruction (emergency or depopulation).	For consideration.
Guidelines GA10.2			
m100	L Hoiles	The industry MUST find a better way to humanely euthanize poultry.	For consideration.
m182	Dr L Hewitt	This section needs to differentiate between methods that cause death (while the bird is unconscious) and those that result in a stun only and therefore need to be followed by a killing method.	For consideration.
m194	J Sanderson	Low atmospheric pressure stunning and gas stunning using non-inert gasses like carbon monoxide should be added to this list.	For consideration.
m200	S Koh	Should include the requirement that killing machines are loaded with animals at a rate (i.e. not too high) that ensures a proper and rapid death.  SA11.4 is inconsistent with GA10.2 which refers to “stunning by blunt trauma”.	For consideration, noting that humane killing is different from slaughter.

m83	B Van Elburg	Low atmospheric stunning recommended – Standard. Gas or controlled atmosphere stunning are another recommended method. Cervical dislocation not to be carried out without prior stunning - Standard. Electrical stunning to be phased out (earlier for geese, turkeys and laying hens). – Standard. <u>[provides evidence from the FBWSR]</u>	For consideration.
m95	LIV	The LIV submits that draft Guideline GA10.2 should be inserted into draft Standard SA10.1 to ensure that the Standard is more specific about the acceptable methods of killing, and to ensure that this can be enforced. Further, the LIV submits that the reference to ‘firearm’ as a humane form of killing should be clarified. The use of a firearm may cause a long painful death if it is not a fatal shot.	For consideration.
m65	Animals Aus	It is unacceptable that this Guideline is not a Standard given the huge numbers of birds being farmed and the foreseeable need to develop and use acceptable methods for the humane killing of poultry. The community expects farmers to exercise a basic duty of care. It is not possible to comply with SA10.1 without complying with GA10.2. The use of the words “ <i>these are</i> ” precludes the acceptance of emerging humane slaughter methods and should be amended to “ <i>and these include</i> ”.	For consideration.
m40	B Sheridan	Sections GA10.2 and GA10.3 of your draft poultry welfare guidelines refer to the use of carbon dioxide in gas mixtures recommended for euthanasia. My concern is that carbon dioxide may not be a stress/pain free method of euthanasia. Whilst at the then Poultry Research Station, the exhaust gases from a motor vehicle were used to euthanize unwanted day old chickens. This method worked perfectly when the exhaust gases contained carbon monoxide. However, when a recently acquired vehicle was used, it was found that the chickens were being cooked alive. This was due to the exhaust gases containing carbon dioxide in the absence of carbon monoxide.	For consideration.
m29b, m115a	RSPCA	Should be amended as follows: <i>Acceptable methods should be used for the humane killing of poultry, these are: cervical dislocation <del>or decapitation</del> for poultry less than 6 kgs; <del>stunning by blunt trauma followed by decapitation or bleeding out for poultry over 6 kgs.</del></i> Decapitation is not a humane method of killing as birds may be conscious for up to 30 seconds following decapitation. There are significant risks associated with blunt trauma which makes it not a humane method to recommend. Poultry greater than 6kgs should be killed using a captive bolt gun.	For consideration.
m144	Dr P Groves	Lists the acceptable methods for euthanizing poultry but the list does not include an overdose of anaesthetic (such as pentobarbitone by injection). This is the preferred method used by private veterinarians if euthanizing poultry brought into their practice. It is also necessary in many research institutions where it is essential for the integrity of some tissues needing specialized collection (e.g. gut segments and ileal contents) which can be destroyed rapidly with other methods. This is a gentle and	Consider adding to acceptable methods for euthanizing poultry

		rapid method if performed by an experienced professional. This method should be included in the list of approved methods.	
m10	ADO	Recommendations: that the practice of ‘fragmentation/maceration for day-old chicks’ in GA10.2 be removed as a recommended method of ‘humane killing’.  The ADO submits that the killing of millions of young chickens is an unconscionable aspect of intensive egg production and must be phased out in Australia.	For consideration.
Guideline GA10.3			
m10	ADO	Recommendation: that the poultry standards and guidelines not allow the use of gas to kill poultry.	For consideration.
m100	L Hoiles	Reduce 35 seconds down to 10 seconds and increase 2 minutes to 5 minutes.	For consideration.
m200	S Koh	“Collapse” within 35 seconds is not a rapid death. To be painless it should be immediate.	
m182	Dr L Hewitt	Where is this figure from? What is more important is that when CO <sub>2</sub> (or a mixture of CO <sub>2</sub> and inert gases) is used the birds are placed initially into a concentration of no more than 40% CO <sub>2</sub> until they are unconscious (assessed by looking for initial collapse of the bird).	For consideration.
Guideline GA10.4			
m10	ADO	Recommendation: that the poultry standards and guidelines not allow the use of gas to kill poultry.	For consideration
m182	Dr L Hewitt	Concentrations of above 40% are painful and aversive. Lower concentrations should be used until the bird is deemed to be unconscious.	For consideration
m50	L McKenna	Proposed amendment: <i>When using gases to kill poultry a mixture of inert gases with a modified atmosphere containing <b>low levels of carbon dioxide (e.g. 30%) added to inert gas</b> [should be used. Provides evidence from the FBWSR]</i>	Consider technical information provided within the submission.

## Guideline GA10.5

m100	L Hoiles	Replace 'should' with the words MUST NOT.	For consideration.
m182	Dr L Hewitt	These methods should be classed as unacceptable within the standards section.	
m29b, m115a	RSPCA	It is extremely important to poultry welfare that the standards in this section specify methods which are not acceptable due to welfare risks, such as crushing of the neck, as is specified in the slaughter section. Move to a standard.	
M73	AVA	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.	
m144	Dr P Groves	Prohibits crushing of the neck during euthanasia but the RSPCA approves of euthanasia by pressing the neck against a sharp object. This essentially is a crushing technique. Will this technique be banned under this document? Spinning of the bird by the head is NOT a humane method in my opinion and should not occur as noted in this guideline.	For consideration.

## Guideline GA10.6

m182	Dr L Hewitt	Is it assumed that this check comes after the killing method (when the method of producing unconsciousness does not result in the death of the bird), for example, after neck cutting. These assessment criteria are not valid for all stunning methods, though can be used to assess death. Definition of 'deliberate movement' is required so that it does not get confused with 'movement' per se.	For consideration.
m100	L Hoiles	Again, replace ' <i>should</i> ' with ' <b>must</b> '.	For consideration.
m29b, m115a	RSPCA	Due to the extremely high risk to poultry welfare if the method of killing is not effective, the following guideline should be moved to a standard.  The final sign of death, <i>clear gap of skin</i> , does not convey the intention of the guideline and is very ambiguous. This should be amended to convey the meaning.	

m65	Animals Aust	It is unacceptable that this Guideline is not a Standard given the huge numbers of birds being farmed and the foreseeable need for the humane killing of poultry, which by definition must include confirmation of death. The community expects farmers to exercise a basic duty of care. It is puzzling to contemplate what other “reasonable action” might be envisaged by SA10.4, if the signs of death listed in GA10.6 are not intended to be the reasonable actions that need to be taken.	
Guideline GA10.7			
m182	Dr L Hewitt	Should state ‘both carotid arteries’ rather than main blood vessels.	For consideration.
m200	S Koh	Unclear whether poultry must be stunned prior to being slaughtered. As written, this guideline allows for animals’ throats to be cut and bled out while they are still alive. However, GA10.7 suggests that animals must be unconscious prior to being cut. I presume this is the case for slaughtering establishments, and needs to be stated explicitly.	For consideration.

# Standards and Guidelines A11 Poultry at slaughtering establishments

## Key issues:

- The use of CCTV in slaughter facilities
- Ensuring unconsciousness before bleeding
- Ensuring death before scalding
- Electrical water bath stunning

## Section A11 - General Comments

Code	Submitter	Submission	Recommendation
m63	WAP	<p>Draft standards are not acceptable and deficient in a number of areas. We recommend the following as additional standards, noting that additional standards specific for minimum parameters for stunning poultry, dedicated welfare officers and CCTV surveillance are also strongly recommended <a href="#">[see submission for explanation and evidence]</a>:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>SA11.X A person in charge must ensure that if birds 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.</p>	DG to examine technical information provided within the submission.



		<p>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.</p> <p>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.</p> <p>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.</p> <p>For controlled atmosphere systems (which can include low atmospheric pressure stunning):</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
m64	ACMF	<p>Regarding section 11 of the S&amp;G “Poultry at slaughtering establishments” (and other than for the comments in the Table above relevant to standards 11.6 and 11.7), the ACMF would like to make the following comments.</p> <p>We note that some individuals and groups have publicly criticised the standards as they relate to processing, but have not indicated in what way the standards themselves are deficient. The ACMF strongly rejects these broad, vague and unsubstantiated claims.</p> <p>The draft standards cover the major welfare concerns that could arise at the processing plant. Importantly, they require that birds are carefully handled before being stunned (SA11.1), are effectively stunned so as to be</p>	For consideration.

		<p>rendered insensible to pain before being killed (SA11.2 and SA11.8) and are dead before they enter the scald tank (SA11.8). We fail to see in what way these standards are deficient. The current draft standards clearly state what a processing plant must achieve; they do not need to prescribe how a processing plant goes about achieving that outcome. To use an analogy, our road rules state that a driver must not drive at a speed over the speed limit. They don't also go on to say that a driver must apply the brakes when approaching the speed limit, or that the driver must only accelerate at a maximum rate for a specified period of time. We need straightforward laws that make it clear what the outcome is that needs to be achieved, not complicated rules that unnecessarily prescribe the minutia of how someone might go about achieving that outcome.</p> <p>We note that there have been calls for processing plants to have video surveillance in the live bird handling part of the processing plant, and we agree in principle with this. In fact, to facilitate compliance with appropriate handling procedures in this area of the plant, over 5 years ago, the ACMF recommended to its chicken processing companies that they install video monitoring of the live bird handling area in all of their plants, to ensure that bird welfare standards are being met. All the major meat chicken processing plants in Australia already have video monitoring in this area to ensure that any inappropriate handling of birds can be detected and acted upon. Noting that the value of video surveillance is actually in what a processing company does with or how it uses the video footage, not whether it simply has it in place, we don't see that this is appropriate to include as a standard, but rather could be included as a guideline</p>	
m93	HSI	<p>[summarised] Electrical water-bath stunning and throat-cutting should be phased out: Although water-bath stunning could theoretically produce a state of insensibility rapidly, the complexities of ensuring the correct electrical stings and the conflict between effective stunning and commercial interests in carcass and meat quality largely preclude these conditions in practice. However, the problem of dumping, handling, and shackling conscious birds remains, even if electrical variables could be satisfactorily controlled. Questions about the nature of the state of unconsciousness (or lack thereof) actually produced by electrical water baths raises further concerns about the system. Therefore, multiple-bird electrical water-bath stunning systems supplied with constant voltages are inadequate on welfare grounds as they do not ensure the least aversive slaughter possible. Killing with exposure to gas is the preferred practice. This should be prescribed in the draft.</p> <p>Independently monitored mandatory CCTV in all slaughterhouses: To help ensure that the slaughter process is carried out as humanely as possible, it is important to monitor activities using CCTV in all areas where the birds are unloaded, stunned and killed.</p>	For consideration.
m38	AFSA	The RSPCA recommended that more requirements are needed in Chapter 11 – Poultry at slaughtering establishments to ensure welfare at abattoirs, and to prevent failures. This includes specifications for electrical	DG to examine technical information

		water bath and controlled atmosphere stunning systems, a requirement for CCTV camera in all abattoirs, and designated animal welfare officers in all abattoirs.	provided within the submission.
m29b	RSPCA	There are many guidelines that should be included as standards, particularly those which relate to the optimal functioning of stunning systems, including guidelines pertaining to the correct operation of stunning equipment, the time birds may be suspended, and the time that bleed out must occur. Since transport, handling and slaughter are extremely high risk in terms of poultry welfare, pain and distress, additional guidelines are important in this section <a href="#">[see submission for technical information]</a> .	
m65	Animals Aust	Re all guidelines in section 11: It is unacceptable that these Guidelines are not Standards given the huge numbers of birds being slaughtered at establishments daily and the vulnerability of the poultry after the stress of catching, transporting, and lairage. Many birds, such as spent hens, will be extremely vulnerable to bone injury and must be handled with care. The community expects the poultry industry to exercise a basic duty of care.	For consideration.
m110, m117	C Davis, J Kendall	Draft standards must be changed to no longer permit electrical-water-bath stunning and throat cutting. Alternative and comparatively less cruel slaughter methods such as controlled atmosphere stunning and killing (CAS) with non-poisonous gas, or low atmosphere pressure stunning and killing (LAPS) must be adopted to reduce handling, stress, and injuries to birds.  Independently monitored CCTV cameras should be mandatory in all housing sheds and abattoirs. Designated animal welfare officers should be employed in all abattoirs	For consideration.
Standard SA11.1			
m182	Dr L Hewitt	Live shackling would not meet this standard, i.e. it does not minimise handling and stress.	For consideration.
m144	Dr P Groves	Uses the term ‘minimises stress’. This is a relative term which is difficult to describe and will inevitably lead to judgemental assessment.	For consideration.
m65	Animals Aust	Acceptable if the word “humane” is inserted before “manner” in SA11.1	For consideration.
m44	EPANSW	Supported but not relevant [to our operations].	No action required.

## Standard SA11.2

m182	Dr L Hewitt	Should refer to immediate loss of consciousness (or the induction of unconsciousness without pain/distress - to allow for controlled atmosphere stunning). List of approved methods, particularly for unusual species etc ostrich/emu.	For consideration.
m34	Voiceless	In line with Standard SA11.2, which requires stunning prior to killing in slaughtering establishments, Voiceless strongly recommends that the Standards in Chapter 10 be amended to require stunning when 'humane killing' is performed, and to reflect that a failure to stun may only be excused in exceptional emergency circumstances. Without these amendments, the proposed S&G will establish contradictory welfare benchmarks for killing animals on-farm versus at a slaughterhouse, even where both methods involved the planned use and upkeep of technical equipment.	For consideration.
m39b	AVPA	Suggest replace 'killing' with 'slaughter' so there is no confusion between SA10.1 and SA11.2.	For consideration.
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	

## Standard SA11.3

m182	Dr L Hewitt	Must ensure that it is clear that this does not include hanging them on a shackle line and putting them through the system.	For consideration.
m65	Animals Aust	Acceptable if "first reasonable opportunity" is added to SA11.3 (this achieves consistency with SA3.3).	For consideration.
m44	EPANSW	Supported.	No action required.

### Standard SA11.4

m182	Dr L Hewitt	This requirement needs to be completely changed. Devices that apply a percussive blow to the head are extremely effective, for example the CASH poultry killing device <a href="#">[see submission for technical information]</a> . Agree that devices which ‘pinch and crush’ the spinal cord must not be used, though this requires clarification to ensure people understand the type of device that would fall into this category.	DG to consider technical information provided in the submission.
m200	S Koh	Inconsistent with GA10.2 which refers to “stunning by blunt trauma”.	For consideration.
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	

### Standard SA11.5

m182	Dr L Hewitt	Is this for individual birds that are ineffectively stunned or in the event of a line breakdown?	Consider clarifying.
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported but not relevant [to our operations].	

### Standard SA11.6

m17, m68, m64, m66, m67	J Cordina, Cordina Chickens; ACMF, ACGC, Ingham’s Turkey,	This standard does not allow for the option of return of birds awaiting slaughter to a farm in the event of an extended delay in slaughtering. While this will not generally be an available option or indeed the best option for the birds in terms of bird welfare, in some cases it could be. It is an option provided for in the Land Transport Standards, and should be allowed in these standards.	For consideration
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	Ingham's meat chicken, et al	<i>"A person must ensure that if there is an extended delay in slaughtering, that is likely to result in poultry over being held in containers for more than 24 hours, alternative arrangements are made for slaughter at an alternative facility, humane killing, <b>or return to a farm.</b>"</i>	
m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	
Standard SA11.7			
m17, m64, m66, m67	J Cordina, Cordina Chickens; ACMF, Ingham's Turkey, Ingham's meat chicken	<p>We accept that processors need to protect birds from adverse conditions while awaiting slaughtering. However, there needs to be some allowance for trailers to be unloaded into the lairage or other protected area once trucks carrying birds arrive at the plant, as it is not always possible to precisely schedule the arrival of trucks carrying birds into the plant so that they can be always be unloaded immediately.</p> <p>We propose that there should be an allowance of 30 minutes from the time a truck is logged in at the weighbridge to when it is unloaded before the requirement for protection <i>"from direct sunlight, radiant and reflected heat, and adverse weather such as rain and wind"</i> commences. An alternative wording that encapsulates this is provided [below].</p> <p>While all major processing plants have facilities in which birds can be protected from direct sunlight and rain, in some cases the expansion of their production has meant that these facilities are not always large enough to ensure that 100% of the birds have immediate access to this protection, or that there is adequate protection from reflected heat. The industry is prepared to work towards this objective however and invest in the upgrading of facilities to achieve this. However, the investment will be significant for affected plants, and we require a phase in period of at least 5 years post S&amp;G sign-off for full implementation of this standard. There must be a "phase in" period of at least 5 years post S&amp;G sign-off for this standard, to allow the necessary facilities to be created, expanded or modified to fully and consistently comply with its intent.</p> <p><i><b>"A person must ensure that, after 30 minutes from the time the truck that delivers the poultry to the processing plant is logged in at the weighbridge, all poultry held awaiting slaughtering must be protected from direct sunlight, radiant and reflected heat, and adverse weather such as rain and wind".</b></i></p>	For consideration

m65	Animals Aust	Acceptable.	No action required.
m44	EPANSW	Supported.	
Standard SA11.8			
m182	Dr L Hewitt	Monitoring the efficacy of neck cutting is important. Dead before they enter the scald tank is important, however this clause must also reiterate the requirement to ensure that birds are dead before recovering consciousness.	For consideration.
m65	Animals Aust	Acceptable if confirmation of death is formally added to SA11.8.	
m44	EPANSW	Supported.	No action required
m144	Dr P Groves	Birds which enter the scald tank before death are obvious after plucking and are commonly called ‘red birds’ due to the hyperaemia in the skin as a result of scalding with an intact blood circulation. Poultry abattoirs make major efforts to avoid these occurrences but a zero tolerance may be difficult to achieve completely. This problem occurs after a bird is stunned but misses neck cutting (including the back up neck cutter specifically positioned to avoid the problem) and has not bled out. The bird has been stunned and is unconscious when entering the scald tank but may still have a heartbeat. It would be difficult to assign a ‘tolerance level’ here but zero is unlikely to be achievable. Perhaps this could be better placed under a Guideline?	For consideration.
Guideline GA11.1			
m182	Dr L Hewitt	What is adequate ventilation? How is it determined? Animal-based measures i.e. assessment of signs of heat stress?	Consider clarifying.

## Guidelines GA11.2

m29b, m115a	RSPCA	Should be a Standard at bare minimum.	For consideration
m182	Dr L Hewitt	What does checked for 'welfare' mean? This is not clear and would lead to a range of interpretations, some of which would not improve welfare during holding.	Consider clarifying 'checked for welfare' and increasing the frequency of checks.
m200	S Koh	Should be checked at least every half an hour. Animals in holding areas can get trapped and suffer terribly that time. Using a camera would be an efficient method of monitoring.	
m206	Darwalla	2 hours is too long, as heat stress can occur much more quickly if ventilation is inadequate in extreme conditions.	
m39b	AVPA	The 2 hour frequency is not considered sufficient for poultry in holding areas in hot weather. The frequency should be increased to reflect the level of risk and at least hourly as a minimum.	
m73	AVA	This should probably be a standard, and the frequency of checking should be at least every hour, and even more frequently in hot weather.	

## Guideline GA11.3

m144	Dr P Groves	Suggests that returning birds from an abattoir to a growing area due to a procedural failure of the stunning capacity as a contingency. However, this presents a major biosecurity risk, which could put large numbers of birds in the growing facility at risk of disease. Operators would need to weigh the welfare considerations of the birds without a home against the potential health risks of exposing a possibly much larger flock.	For consideration.
m182	Dr L Hewitt	Not just a contingency for 'stunning', but any breakdown/emergency that leads to delay to processing.	For consideration.



## Guideline GA11.4

m103	N Kratzmann	My experience tells me that there must be government oversight to ensure contingency plans are in place and are documented. I can say, I have seen instances in summer of layer hens dying from heat exhaustion when waiting for breakdowns to be repaired at the slaughter house. There needs to be standards that ensure the guideline GA11.4 is enforced.	For consideration.
m182	Dr L Hewitt	Misting systems should be used with caution as they do not always enable birds to adequately dissipate heat due to the increase in relative humidity.	For consideration.
m29b, m115a	RSPCA	Should be a Standard at bare minimum.	For consideration.

## Guideline GA11.5

m182	Dr L Hewitt	This is impossible to achieve without changing the whole shackle line in some processing plants. Shackle lines are designed to fit tightly to improve conductivity. Birds are processed 'as hatched', therefore one size would not fit all birds.	For consideration.
m200	S Koh	What is "undue trauma"? This vague term allows for a great degree of trauma to occur. Remove the word "undue".	For consideration.
m29b, m115a	RSPCA	Should be a Standard at bare minimum.	For consideration
m50	L McKenna	The need to shackle and invert live and conscious birds is a significant welfare concern <a href="#">[see submission for more information]</a> .	Refer to technical information provided in the submissions.

### Guideline GA11.6

m182	Dr L Hewitt	Definition of 'short time'. Maximum time should be stipulated in the standards. Research has shown that when shackling is performed properly, chickens only require around 10-15 seconds to settle. Need to emphasise that this requirement relates to conscious birds prior to stunning.	Refer to technical information provided in the submissions.
m50	L McKenna	The need to shackle and invert live and conscious birds is a significant welfare concern <a href="#">[see submission for more information]</a> .	

### Guideline GA11.7

m182	Dr L Hewitt	More important that lighting is uniform from shackling to stunning, rather than the light level per se.	For consideration.
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### Guideline GA11.8

m182	Dr L Hewitt	Breast comforter should be from the 'start' of the shackling point not the end and up to the point that the bird enters the waterbath. Birds need to maintain contact with the breast comforter along the entire length. Birds also need to be kept free from obstructions.	For consideration.
m29b, m115a	RSPCA	Should be a Standard at bare minimum.	For consideration.

### Guideline GA11.9

m182	Dr L Hewitt	3 minutes hanging time is very long, particularly for heavier birds such as turkeys. This should be reviewed and reduced, particularly as it is a guideline and therefore should be encouraging best practice. No times stipulated for other poultry.	For consideration.
m29b, m115a	RSPCA	Should be a Standard at bare minimum. However RSPCA recommends that above 3 minutes be revised to 1 minute, and apply to all species.	For consideration.

m50	L McKenna	Phase out electrical stunning and replace with gas stunning.	For consideration.
Guideline GA11.10			
m182	Dr L Hewitt	Pre-stun shocks can also be a consequence of shackle line design and wing flapping activity.	For consideration.
m29b, m115a	RSPCA	Should be a Standard at bare minimum.	For consideration.
m50	L McKenna	Phase out electrical stunning and replace with gas stunning.	For consideration.
Guideline GA11.11			
m182	Dr L Hewitt	<p>Effective electrical waterbath operation is essential and due to the fact that animal-based outcomes cannot always be used to assess effective electrical stunning in poultry, system parameters that result in effective stunning need to be covered by the standards.</p> <p>‘Correct immersion of the birds in the water ramp’ – This does not make sense and should refer to immersion of the head of each bird.</p> <p>The required voltage and resulting current is dependent on the resistance of each bird and is not significantly influenced by bird age and size (unless these factors reduce the resistance of the leg/shackle interface). What is more important is ensuring that both legs are placed in the correct position on the shackle. The role of electrical frequency in producing an effective stun also needs to be considered. Minimum currents per bird at different frequencies should be included in the guidance.</p>	For consideration.
m29b, m115a	RSPCA	Should be a Standard at bare minimum.	For consideration.
m50	L McKenna	Phase out electrical stunning and replace with gas stunning.	For consideration.

### Guideline GA11.12

m182	Dr L Hewitt	What about tipping systems for electrical stunning? This guidance is not just applicable to gas.	For consideration.
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### Guideline GA11.13

m182	Dr L Hewitt	The correct concentration for what? Most systems work on a rising or staged concentration of gas mixtures. Birds should be exposed to <40% CO <sub>2</sub> until they are unconscious, before being moved into higher concentrations.	For consideration.
m29b, m115a	RSPCA	Should be a Standard at bare minimum.	For consideration.

### Guideline GA11.14

m182	Dr L Hewitt	To ensure that they are rendered unconscious (collapse) before they reach 40% CO <sub>2</sub> (if CO <sub>2</sub> is being used).	For consideration.
m200	S Koh	“Minimal distress” is vague. There should be standards/guidelines about what level of trauma/suffering/distress is considered acceptable.	For consideration.

### Guideline GA11.15

m182	Dr L Hewitt	Bleeding of poultry should also refer to cutting both carotid arteries and not just total bleed time. Bleed times for other poultry species not considered in the document.	For consideration.
m200	S Koh	Unclear whether poultry must be stunned prior to being slaughtered. As written, this guideline allows for animals’ throats to be cut and bled out while they are still alive. However, GA10.7 suggests that animals must be unconscious prior to being cut. I presume this is the case for slaughtering establishments, and needs to be stated explicitly.	For consideration.

m29b, m115a	RSPCA	Should be a Standard at bare minimum.	For consideration.
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# Standards and Guidelines B1 Laying Chickens

## Key issues:

- The use of conventional cages (see previous sections)
- Stocking densities
- Housing enrichments
- Provision of food in outdoor areas with some production systems

## Section B1 - General Comments

Code	Submitter	Submission	Recommendation
m63	WAP	<p>[Summarised] WAP rejects Standards B1.1 to B1.7 inclusive as we do not support the use of cages for laying hens. We strongly recommend the following standards with additional guideline <a href="#">[see submission for explanation and evidence]</a>:</p> <p>SB1.X A person in charge must phase out existing cages for laying hens. All new facilities must provide cage free systems.</p> <p>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.</p> <p>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.</p> <p>SB1.X A person in charge must provide litter no later than 3 weeks of age for all birds with a minimal coverage of one third available ground space. Accumulated manure is not considered litter.</p>	DG to examine technical information provided within the submission

		<p>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.</p> <p>SB1.X A person in charge must not use electric wires to train or control birds.</p> <p>SB1.X A person in charge must provide access for birds to suitable perches or platforms at all times.</p> <p>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.</p> <p>SB1.X A person in charge must provide suitable ramps between tiers to prevent keel damage and related injury in multitier systems (e.g. aviaries).</p>	
m6	P Fraser	Proposed change to Standards: Delete all of SB1 and GB1.1 Delete all of SB3.1 – SB3.4, SB3.8 – SB3.10.	<p>DG to consider submissions calling for a phase out of conventional cages (Option D in the RIS) and review technical information provide in submissions.</p>
m110, m117	C Davis, J Kendall	A standard should be included in 'Chapter B1 – Laying chickens' to ensure that all battery cages (including furnished and colony cages) for layer hens are phased out.	
m95	LIV	The LIV submits that the objective of the draft Standards SB1.1 – SB1.9 should be to ensure that the housing of battery hens is eradicated. If cages are to be phased out over a period of time, proposed 'Option D', then this should occur as quickly as possible. This is supported by the RSPCA Report which recognises that if the Standards permit any battery hen farming, then the system will continue. The LIV submits that the Standards must be more overt in preventing this type of housing. These Standards should not only provide a minimum level of comfort to ensure that the animals are able to perform their normal behaviours, but that the animals are able to have positive experiences in their surroundings and not be restricted.	
m93	HSI	[Summarised] HSI recommends an end to the battery cage because all caged hens permanently denied natural behaviours <a href="#">[technical evidence provided]</a> . The only reason supporting cages is industry pressure. Other countries phased/are phasing out. We are behind. Over 80% of Australian want battery cages gone. Retailers and food producers are committed to cage-free. Cages do not support good health or welfare <a href="#">[technical evidence provided]</a> .	
m155	Dr D Evans	Add a Standard to prevent use of caged systems for layer hens (allow phasing out by deadline).	

m50, m83	L McKenna, B Van Elburg	Standards SB1.1 - 1.3, and Guidelines GB1.27-1.31 must be removed as the community demands an immediate phase out of all caged egg production systems.	
m59	Australian Ethical	Mandatory provision of environmental enrichments including perches, scratching areas and nesting boxes for laying hens. The proposed standards have guidelines around perches and nests, but no enforceable standards.	For consideration.
m95	LIV	The draft Guidelines regarding nests for Layer Hens should be made into Standards to ensure compliance and enforceability.	
m51	McLean Farms	GB1.4 to GB 1.31 relate to non-cage systems only. Recommended to include a suitable heading prior to “Litter” to make this clear.	For consideration.
m93	HSI	<p>The Standards dictate specific maximum stocking densities for each species. HSI recommends the stocking densities should be reduced for all species to enhance bird welfare. (Note: Sufficient perches should be provided in multi-tiered systems to allow at least half of the flock to occupy at any one time).</p> <p>Layer pullets: 17 kg/m<sup>2</sup> at 16 weeks of age (assuming a 1.2kg bird at 16 weeks)</p> <p>Layer hens: 7 birds/m<sup>2</sup> of the usable area for floor-based systems; 9 birds/m<sup>2</sup> of the usable area for multi-tiered systems.</p>	For consideration.
m29b	RSPCA	<p>The following two standards have been deleted from an earlier draft of the standards. The RSPCA does not believe that animals should be confined to barren battery cages. However, all flooring should be designed to support each forward pointing toe, and all housing facilities should enable birds to be visible for inspection and these two standards must be re-included.</p> <p>SB1.3 A person in charge must ensure where poultry are confined in cages, the floor is be constructed to enable support for each forward pointing toe.</p> <p>SB1.4 A person in charge must ensure that all poultry in multi deck cages are visible for regular inspection</p>	For consideration.
m29b	RSPCA	RSPCA Australia insists that a phase out of cages must be included within the standards and guidelines document. <u>See the [submission] presenting the scientific evidence supporting this position.</u>	DG to review technical information provided.



		A number of these guidelines in this section should be moved to standards, including the guidelines for lighting, litter, nests and perches. <u>Scientific evidence to support this is included in [the submission]</u> .	
m29b	RSPCA	Standard SB3.6, which is included for breeder chickens, must also be included for all poultry species, with standards specific to how they should be handled.	Consider adding a similar standard in all part B sections.
Standard SB1.2			
m95	LIV	The LIV submits that this Standard should specify permissible multi-deck arrangements to ensure that it can be enforced.	For consideration.
Standard SB1.3			
m194	J Sanderson	This is inadequate for modern standards and far less than would thought to be appropriate for a modern western country by either Australians or the international community.	For consideration
m200	S Koh	Poultry should not be kept in cages! However, as it is unlikely the law will change anytime soon, if kept in cages they should at least be able to stretch and raise their heads, not simply stand “at normal height” which means that some birds will have their heads hitting the roof. Cage heights should be at least 60 cm.	For consideration.
m29b	RSPCA	<p>Recommended revision to standard below in bold font:</p> <p><i>SB1.3 A person in charge must ensure poultry in cages are able to stand at a normal height. Cages must be at least higher than the maximum height of all the poultry standing normally. The height of all cages must be at least 40 cm over 65% of the cage floor area <b>and not less than 35 cm at any point.</b></i></p> <p>As flagged in a previous draft, this was in the Code of Practice and there is no reason the housing facility should not be able to provide this and that this should be removed from the standard.</p>	For consideration.

## Standard SB1.4

m83	B Van Elburg	Must be amended to incorporate the optimum head room between levels as recommended by Animals Australia if it differs from the minimum headroom of 45cm provided in the above	For consideration.
m29b	RSPCA	The below standard conflicts with the above – it is acknowledged that there must be at least 45cm of headroom for birds. This should be reflected in the above standard SB1.3	

## Standard SB1.5

m194	J Sanderson	This is inadequate.	For consideration.
m50, m83	L McKenna, B Van Elburg	Amend Standard- <i>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 8 hours of continuous darkness in each 24-hour period</i> [uses the FBWSR as evidence].	DG to examine technical information provided within the submission.
m61	SBA	SBA strongly supports the use of midnight feeding (2 hours lights on in the middle of a dark period every 24 hours e.g. 16 hours on, 3 hours off, 2 hours on, 3 hours off) to reduce the impact of high environmental temperatures, particularly in free range situations where environmental conditions cannot be as carefully manipulated as cage and barn systems. Addition of this night time lighting period allows birds an opportunity to eat and drink during the cooler part of the day, which improves liveability and reduces negative behaviours including feather picking.	DG to examine technical information provided within the submission.
m144	Dr P Groves	Requires 4 hours continuous dark (Standard). Some recent research has indicated that intermittent lighting programs can be beneficial (based on naturally inspired lighting patterns) which may have shorter but more frequent periods of darkness [ <u>provides supporting technical information in submission</u> ]. Perhaps there should be an allowance for this requirement to be responsive to new research findings as they develop?	
m34	Voiceless	Voiceless recommends amending Standards SA6.5 and SB1.5 to provide for at least 7-8 hours of continuous darkness in each 24 hour period. Voiceless notes that without amendment, Standard SB1.5 will contradict the recommended minimum period of continuous darkness recognised in the same chapter under Guideline GB1.2.	

m29b	RSPCA	The RSPCA recommends the following revision, indicated with strikethrough and bold font.  <i>SB1.5 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 <del>4</del> <b>8</b> hours of continuous darkness in each 24-hour period, <b>and 8 hours of continuous light in each 24-hour period.</b></i>	
Standard SB1.6-SB1.7			
m50, m83	L McKenna, B Van Elburg	Standards SB1.6-1.7 must be removed as the community demands an immediate phase out of caged egg production systems.	For consideration.
m194	J Sanderson	This is a level that was considered the minimum appropriate 18 years ago. The world has moved on and these are no longer appropriate minimums.	DG to examine technical information provided within the submissions regarding the revision of stocking densities.
m200	S Koh	These stocking densities are way too high. The highest equates to a bird having an area less than the size of an A4 sheet of paper! Each single bird should have space to flap their wings, and an area of at least 1000cm <sup>2</sup> . Should not exceed 34kg/m <sup>2</sup>	
m73	AVA	SB 1.6 – 1.7 – as commented above - the minimum cage floor area for caged layers has not been revised since the 2002 MCOP. 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.	
m95	LIV	The LIV recognises that the draft Standard SB1.6 is aimed at ensuring that birds have sufficient space. However, the space allowances provided for are inadequate and will not ensure that animals are able to perform their usual behaviours. Their behaviour within these spaces will be obstructed. The LIV suggests that Animal Health Australia engage in further consultation to determine appropriate space allowances. If the cages do not allow the birds to perform natural behaviours and live without stress and discomfort, then the Standards fail to satisfy proper animal welfare living requirements.	
Standard SB1.8			
m50, m83	L McKenna, B Van Elburg	The Standard must incorporate the recommendations by Animals Australia for the stocking density for laying pullets and adult laying chickens as submitted by Animals Australia.	DG to Examine technical information provided

m38	AFSA	Reduce the maximum stocking density in barns or sheds (as they are phased out) for non-cage layer hens to 2 birds per m <sup>2</sup> . We further support the RSPCA's recommendation that maximum stocking densities be decreased for all species, so that each individual bird has more room to move and express its natural behaviours.	within the submissions regarding the revision of stocking densities.
m147	Sentient	Change to 24 kg/m <sup>2</sup>	
m51	McLean Farms	<i>A person in charge must not exceed a stocking density of 30 kg/m<sup>2</sup> (measured as bird density in the useable area) for rearing laying pullets and <b>12 birds/m<sup>2</sup></b> for managing adult laying chickens.</i> Amendment makes the standard consistent with ESA & MCOP.	
m93	HSI	<p>The draft currently prescribes a stocking density for non-caged systems (or barn layer hens) (in SB1.8) of no more than 30kg/m<sup>2</sup>. This means that this limit would also apply to free range layer hens for their maximum indoor density. However, for free range birds it is essential for the stocking density inside each shed to be no more than 15kg/m<sup>2</sup>. This would be the equivalent to approximately 7.5 hens/m<sup>2</sup> (assuming a 2kg hen). A maximum of 5,000 birds per shed should also be stipulated otherwise they will not be able to successfully navigate past other birds to reach the outdoor range. These parameters need to be specified in the draft.</p> <p>HSI strongly recommends that maximum flock numbers for layer hens should not exceed 5,000 birds per house, with an indoor stocking density no more than 15kg/m<sup>2</sup> including the roosting area. Where large numbers of 15,000 or more birds are placed in large sheds this means they will never make it to the pop-holes, and therefore they will be unable to access the outdoor range at all. This would prevent the birds from having meaningful and regular or continuous access to the outdoor range. On true free range farms with stocking densities less than 1,500 hens per hectare, during daylight hours it is unusual to find more than 10% of hens inside the sheds at any one time.</p>	
m63	WAP	We strongly recommend this standard.	For consideration.
Guideline GB1.0			
m194	J Sanderson	This should be a standard.	For consideration.

### Guideline GB1.1

m144	Dr P Groves	Refers to a square mesh size for flooring when not all cages have square mesh designs.	For consideration.
m194	J Sanderson	This is too large of a hole size for young chickens and not ideal for older chickens either.	For consideration.
m50, m83	L McKenna, B Van Elburg	Mesh and plastic slat flooring must not be used as the FBWSR identifies welfare issues with these flooring types. It is recommended that wooden floors be used instead.  Amend and upgrade to Standard: <i>The slope of the floor should not exceed 8 degrees. <b>Wooden slats must be used instead of plastic slats or mesh.</b></i>	DG to examine technical information provided within the submissions.

### Guideline GB1.2

m194	J Sanderson	This should be a standard.	For consideration.
m50, m83	L McKenna, B Van Elburg	Amend and upgrade to Standard: <i>The lighting system should provide a minimum period of 8 hours <del>continuous artificial</del> or natural lighting per day and a minimum period of 8 hours continuous darkness (with all lights off) to be provided at night, in every 24-hour period. The exception to this is during extreme heat where feeding birds during cooler parts of the day may be required to reduce the risk to their welfare.</i>	
m197	PROOF	There is clearly a need for at least 2 sessions of 4 hours of continuous darkness. This change to only 4 hours of continuous darkness in a 24 hour period is not in the best interest of the welfare of the birds.	For consideration.

### Guideline GB1.3

m194	J Sanderson	This is inadequate and regardless should be a standard.	For consideration.
m50, m83	L McKenna, B Van Elburg	Please incorporate the recommendations by Animals Australia for the minimum lighting intensity for layer chickens into a Standard that replaces GB1.3.	

m200	S Koh	An average light intensity of at least 10 lux during light periods is hopeless. Poultry kept in sheds already suffer from being kept indoors their entire lives. Lighting should mimic natural conditions as far as possible, i.e. the light intensity of sunlight during daylight periods (or at least 50 lux).	For consideration.
m39b	AVPA	10 Lux is difficult to achieve practically in caged housing systems. The light intensity is uneven from top to bottom. A minimum of 5 lux is more practical in this case and in accordance with the standards.	For consideration
m51	McLean Farms	<i>The light intensity measured at bird head height across the laying facility, during the light period should be at least <b>5</b> lux.</i> Recommended for management purposes.	
Guideline GB1.4			
m194	J Sanderson	This should be a standard.	For consideration
m34	Voiceless	Recommends converting to a Standard.	
m83	B Van Elburg	Amend and upgrade to Standard: <i>For tiered systems, the litter area must provide sufficient space to allow at least one third of the flock to forage and dust-bathe at any one time.</i>	
Guideline GB1.5			
m34	Voiceless	Recommends converting to a Standard.	DG to examine technical information provided within the submissions.
m50, m83	L McKenna, B Van Elburg	Amend and upgrade to Standard- <i>Poultry should be given continuous access to litter immediately following placement</i> [uses the FBWSR as evidence].	
Guideline GB1.6			
m110, m117, m114, m29b,	C Davis, J Kendall, G Walker, RSPCA, G	Guideline GB1.6 should become a standard in Chapter 4 ‘Facilities and Equipment’ to ensure that all hens of all species must be provided with nests.	DG to examine technical information provided within the submissions.

m115a, m3, m94	Rickuss, J Haviland & M Derby		
m38	AFSA	We support the RSPCA’s recommendation that GB1.6 become a standard in Chapter 4 – Facilities and equipment to ensure that hens of all species must be provided with a next. We add that this should be a temporary Standard until the housing of all poultry is phased out in the next 10 years, with a view to all poultry systems becoming free range.	
Guideline GB1.7			
m194	J Sanderson	This should be a standard.	For consideration
m200	S Koh	One nest for every 7 birds or 1 m <sup>2</sup> nesting box area for every 120 birds is too low. I doubt farmers would have only a seventh of their chickens laying eggs at any one time.	DG to examine technical information provided within the submissions.
m50, m83	L McKenna, B Van Elburg	Please incorporate the optimum number of layer chickens per nest box or optimum nesting box area for a specified number of layer chickens as recommended by Animals Australia into a Standard that replaces GB1.7.	
Guideline GB1.8			
m50, m83	L McKenna, B Van Elburg	Amend and upgrade to Standard- <i>Nest boxes must be enclosed and provide <b>straw</b> as a substrate to encourage nesting behaviour.</i> The FBWSR found that “The most important influence on nest selection, however, appears to be the provision of some form of nesting material”.	DG to examine technical information provided within the submissions.
Guideline GB1.9			
m83	B Van Elburg	Amend and upgrade to Standard: <i>Nest box flooring <b>must not consist of wire or plastic-coated wire. Rubber or artificial grass must be provided as nest box flooring material</b></i> <u>[uses the FBWSR as evidence]</u> .	DG to examine technical information provided within the submissions.

## Guideline GB1.11

m83	B Van Elburg	Upgrade to Standard.	For consideration.
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## Guideline GB1.12

m200	S Koh	What do electric wires do, give the birds electric shocks? If so this is appalling. Surely walls and corners can be blocked off to prevent floor eggs.	DG to examine technical information provided within the submissions.
m50, m83	L McKenna, B Van Elburg	Remove GB1.12 and replace with Standard: <i>Electric wires must not be used along walls and corners to prevent floor eggs</i> [uses FBWSR as evidence].	

## Guideline GB1.13

m200	S Koh	The words ' <i>if possible</i> ' should be removed.	For consideration.
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## Guideline GB1.14

m16	C de Fraga	I cannot see that the guideline gives a context. This would not be possible in a conventional cage system and the statement could implicitly mean that a system that does not allow perches should not be permitted.	For consideration.
m144	Dr P Groves	Regarding perches being available at all times seems to ignore cages as most current conventional cages do not have perches.	
m39b	AVPA	Hay bales and other forms of perching may also be suitable without being prescriptive in relation to the type of perching. See comments under Option F on inclusion of perches in all systems.	For consideration.
m34	Voiceless	Recommends that a Standard be inserted into Chapter 4 to require the provision of perches at all times, in addition to converting Guideline GB1.14 to a Standard.	For consideration.



m83	B Van Elburg	Upgrade to Standard.	
Guideline GB1.15			
m169	Karoda	Believe 7.5cm perch height is a reasonable benchmark for bird welfare and worker safety.	For consideration.
Guideline GB1.16			
m194, m83	J Sanderson, B Van Elburg	This should be a standard.	For consideration.
m29b	RSPCA	<p>The current MCOP states that linear perches should allow not less than 15 cm per hen, and the horizontal distance between the perches be at least 30 cm but not more than 1 m, and the horizontal distance between perch and the wall should be at least 20 cm.</p> <p>Perches should support birds' feet, and thick enough that the claws don't pierce the foot pad – e.g. 4 cm wide), and not have sharp edges.</p>	
Guideline GB1.17			
m50, m83	L McKenna, B Van Elburg	Amend and upgrade to Standard: <i>Birds must be given meaningful daily access to the veranda <b>without delay</b> following placement [uses the FBWSR as evidence].</i>	DG to examine technical information provided within the submissions.
Guideline GB1.18			
m83	B Van Elburg	Amend and upgrade to Standard: <i>The veranda must be designed and constructed to provide shade, natural light and good airflow <b>and protection from rain and wind.</b></i>	For consideration.

## Guidelines B1.19

m50, m83	L McKenna, B Van Elburg	Upgrade to Standard and incorporate the recommendation of Animals Australia as to the optimum space allocation in the veranda to meet the foraging and dust bathing needs of the flock.	For consideration.
m147	Sentient	This is inadequate, as more than one third may wish to dust-bathe at any one time.	For consideration.

## Guideline GB1.20

m83	B Van Elburg	Upgrade to Standard.	For consideration.
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## Guideline GB1.21

m194	J Sanderson	This should be a standard for fair marketing.	For consideration.
m46	G Arzey	This is inconsistent with the exemptions in the Egg Labelling Standard and is likely to cause confusion.	
m83	B Van Elburg	Amend and upgrade to Standard: <i>Birds must have daily access to the outdoor area immediately after the egg laying period. The exceptions to this are during unsuitable weather conditions, under direct veterinary advice, during treatment specified in the Veterinary Health Plan, or on the day of depopulation.</i>	
m73	AVA	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.	
m189	S Kay	Guideline GB1.21 should be mandatory. The GB21.21 states that unsuitable weather conditions prevent daily access to the outdoors. Unsuitable weather conditions need to be defined to stop operators unreasonably restricting out door access.	
m144	Dr P Groves	The caravan-style free range layer operations can only provide feed and water outside. Hence the birds are forced outside regardless of the prevailing conditions.	For consideration.

m200	S Koh	A minimum time period for access to the outdoor area should be specified. As stated, this guideline could be met by allowing 1 minute of access to the outdoor area per day, which is grossly inadequate.	Consider stipulating a time period for clarity.
m73	AVA	A minimum duration of access to the outdoor area of 8 hours during daylight hours, should be stipulated.	
m39b	AVPA	The duration of access to the range should be specified in this guideline. For example, for a minimum of 8 hours per day.	
Guideline GB1.22			
m83	B Van Elburg	Upgrade to a Standard.	For consideration.
Guideline GB1.23			
m194	J Sanderson	This should be a standard.	For consideration.
m50, m83	L McKenna, B Van Elburg	Upgrade to Standard and incorporate the recommendation of Animals Australia for minimum area of shade/shelter per 1000 birds in the outdoor area.	
m200	S Koh	A minimum 8m <sup>2</sup> of shade per 1000 birds is too low.	For consideration.
m51	McLean Farms	Amend to: <b><i>At least 25% of the flock at 15 birds/m<sup>2</sup> of shade at midday in high summer by natural and/or artificial means should be provided and distributed across the outdoor area.</i></b>	
Guideline GB1.24			
m144	Dr P Groves	What would constitute ‘deficient’ use of shade/shelter?	Consider clarifying within the guideline.

### Guideline GB1.25

m83	B Van Elburg	Amend and upgrade to Standard- Drinking water must be provided in the outdoor area. Food must not be provided in the outdoor area.	For consideration.
m144	Dr P Groves	[Guideline is] further references to not providing feed and water in outdoor areas. As mentioned above under SA3.5 and SA5.4, this precludes the caravan-style free range layer operations completely as they can only provide feed and water outside. Hence the birds are forced outside regardless of the prevailing conditions.	For consideration.

### Guideline GB1.26

m39b	AVPA	Similar guidelines should be provided for free range turkeys.	For consideration.
m83	B Van Elburg	Upgrade to Standard and incorporate the recommendations of Animals Australia for the minimum size of pop holes and combined total width for each 1000 birds.	For consideration.

### Guideline GB1.27

m194	J Sanderson	This should be increased and be a standard.	For consideration.
m200	S Koh	Does a cage height of 45 cm allow the birds to stretch and move their necks freely? Cage heights should be at least 60 cm.	For consideration.
m29b	RSPCA	Colony Cages: All hens should have continuous access to good quality litter, perches providing 15cm of perch space per bird, and there should be stocking densities specified for colony cages.	

### Guideline GB1.28

m144	Dr P Groves	Regarding scratch areas in colony cages and GB1.30 regarding scratch pad areas and GB1.31 referring to dust bathing material. Colony cages have not yet been adopted in Australia apart from a few research institutions.	DG to consider reviewing technical information
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		Research in Australia has shown that the birds only value a perch and a secluded laying area/nest box. Other enrichments were mostly ignored by the birds. This Guideline has disregarded this science.	associated with this guideline.
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# Standards and Guidelines B2 Meat Chickens

## Key issues:

- Lighting regimes for meat chickens
- Beak trimming
- Stocking density
- Genetics and the use of slower growing animals

## Section B3 - General Comments

Code	Submitter	Submission	Recommendation
m63	WAP	<p>WAP recommends the following Standards <a href="#">[see submission for explanation and evidence]</a>:</p> <p>SB2.X A balance of welfare and production must be taken into consideration when selecting meat chicken genetics.</p> <p>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.</p> <p>SA2.X A person in charge must provide suitable enrichment to poultry from 10 days of age to promote leg strength and natural behaviour.</p> <p>SB2.X Cage systems are not permitted for meat chickens.</p> <p>SB2.X New facilities must include natural light.</p>	DG to examine technical information provided within the submission.
m93	HSI	[Summarised] Slower growth rates of broiler chickens to alleviate health and alleviate issues: Selective breeding has resulted in broiler chickens that grow so fast, they reach slaughter weight in just 6 weeks. This has led to health issues. Alternatives to the conventional Cobb and Ross genetic lines should be encouraged.	For consideration.

		These strains have higher welfare outcomes including lower mortality, improved gait, and more active behavioural profiles.	
m29b	RSPCA	<p>The note [superscript 4 in the section heading] indicating that use of cages are permissible, has been added to the draft standards and was not present in previous drafts. Cages should absolutely not be introduced for meat chickens due to extreme welfare consequences. Housing meat chickens on wire and an absence of litter causes physiological stress, as well as mechanical stress and an increase in leg infections. This would also be a very negative image for the industry, which is already being tarnished by the egg industry's use of battery cages.</p> <p>The RSPCA does not support housing poultry in cages.</p> <p>There must be a standard specifically prohibiting the use of cages for meat chickens and breeder bird. <u>Evidence on the extreme negative consequences of housing poultry in cages is provided in the body of the submission.</u></p> <p>The wording '(Non-Caged Systems)' would therefore be redundant.</p>	DG to consider, referring to the technical information in the submission.
m29b	RSPCA	<p>In the MCOP, 'A2.1.3 In managing meat chickens to avoid the effects of heat stress, the combination of potential weather patterns, shed design, temperature and humidity control capabilities, and the grower's management record, must be considered by processors and growers when determining stocking densities and pick up dates. These must be planned to ensure that birds are not put at risk of death from the effects of heat stress. Increased mortalities that can be attributed to heat related causes are not acceptable. High stocking densities restrict the birds' abilities to move and may result in increased leg weakness. This should be monitored and stocking densities decreased if leg weakness occurs.'</p> <p>There is no reason why these considerations should not be incorporated into the current standards for meat chickens</p>	For consideration.
m29b	RSPCA	The extremely fast growth of broilers contributes to many welfare issues including leg and metabolic problems. A standard or guideline on the welfare advantages of slower-growing broilers must be included here.	For consideration.
m29b	RSPCA	Standard SB3.6, which is included for breeder chickens, must also be included for all poultry species, with standards specific to how they should be handled.	For consideration.

m110, m117	C Davis, J Kendall	Meat chickens have short, painful lives in crowded sheds, without proper rest. Light requirements should be balanced. Their unnatural weight causes problems with pressure on joints and hearts. As a minimum, industry should have more natural, slow growing breeds to prevent health and welfare associated with fast unnatural growth. Stocking densities should be reduced with straw bales, perches, dust baths and opportunities for foraging and outdoor range. They should have 8 hours sleep and experience daylight to maintain healthy eye development.	
Standard SB2.1			
m63	WAP	Recommend the following Standard <a href="#">[see submission for explanation and evidence]</a> : <i>A person in charge must ensure that <b>lighting intensity must be a minimum of 20 lux and</b> 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.</i>	DG to examine technical information provided within the submissions.
m50, m83	L McKenna, B Van Elburg	This must be changed to a minimum of 8 hours dark for all broiler chickens including chicks <a href="#">[cites the FBWSR as evidence]</a> .	
m29b	RSPCA	There should be a standard included with a requirement for a continuous dark period for chicks less than 7 days of age. Chicks should receive at least one hour of darkness in the first 24 hours, and more after that	
m17	J Cordina, Cordina Chickens	Needs to be reworded: <i>A person in charge must ensure that lighting patterns must encourage activity</i> or removed.	Suggest reword standard to improve clarity.
m64, m68	ACMF, ACGC	[With suggested changes in SA6.5] SB2.1 could either (b) be deleted or (b) retain what remains of its original intent: ' <i>A person in charge must ensure that lighting patterns must encourage activity</i> '	
m206	Darwalla	There needs to be allowance to lower this level as a management tool to control feather pecking and cannibalism.	For consideration.
m144	Dr P Groves	Requires a minimum 4 hour dark period for meat chickens older than 7 days. Recent research has discovered a beneficial effect on disease resilience of birds under an intermittent lighting program using repeated periods of 4 hours darkness. This Standard should make provision for response to new research findings as they become validated.	For consideration.



## Standard SB2.2

m200	S Koh	Surgical procedures involving mutilation, such as beak trimming, should not be allowed.	For consideration.
m83	B Van Elburg	Amend Standard- <i>A person must not undertake surgical procedures, such as beak trimming, on meat chickens <b>unless under veterinary advice</b>.</i> The FBWSR states that “broilers are not, generally, at risk of injurious pecking.” (B10), and therefore beak trimming must not be carried out unless under veterinary advice.	For consideration.
m63	WAP	WAP strongly recommends this Standard <a href="#">[see submission for explanation and evidence]</a>	DG to review technical information within the submission.

## Standard SB2.3

m200	S Koh	Stocking densities are too high, they should not exceed 34 kg/m <sup>2</sup> . Chickens must have room to move and flap their wings.	DG to review technical information within the submissions.
m63	WAP	WAP strongly recommends the following standard <a href="#">[see submission for explanation and evidence]</a> : <i>A person in charge <b>must not exceed stocking density of 30kg/m<sup>2</sup> during the lifetime of the meat chickens</b>.</i>	
m38	AFSA	Reduce the maximum stocking density in barns or sheds (as they are phased out) for meat chickens to 15kg per m <sup>2</sup> . We further support the RSPCA’s recommendation that maximum stocking densities be decreased for all species, so that each individual bird has more room to move and express its natural behaviours.	
m29b	RSPCA	The current stocking densities for meat chickens are extremely high, and the majority of the industry is already operating to lower stocking densities. There is sufficient evidence provided in the body of this submission supporting a significant lowering of maximum stocking density to 34kg/m <sup>2</sup> for tunnel and mechanically ventilated systems for bird welfare	
m93	HSI	HSI recommends the stocking densities should be reduced for all species to enhance bird welfare. For meat chickens: 28 kg/m <sup>2</sup> for natural ventilation systems; 30 kg/m <sup>2</sup> for tunnel ventilation systems.	

## Guideline GB2.1

m177	J Johnson	Or 'no light'. On the evening of a full moon, catchers request 'no light'.	For consideration.
m39b	AVPA	This guideline should apply to all types of poultry, including laying chickens and meat breeders.	For consideration.

## Guideline GB2.2

m50, m83	L McKenna, B Van Elburg	Remove GB2.2 as the FBWSR notes that unlike broilers, broiler breeders are routinely raised on plastic slats, and that the material may partially explain the high incidence of Foot Pad Dermatitis in broiler breeders. <a href="#">[cites The FBWSR as evidence]</a> .	DG to examine technical information provided within the submission.
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## Guideline GB2.3

m73	AVA	There should be similar standards for the outdoor range for meat chickens, as described above for layers.	For consideration
m39b	AVPA	Suggest inclusion of the same guideline from the laying chickens section, GB1.22, a 'daily record specifying the date and times of access to the outdoor area should be kept'.	For consideration.

## Guideline GB2.4

m83	B Van Elburg	Upgrade to Standard and incorporate the minimum recommendations of Animals Australia for pop hole openings as well as total width of all opening per 1000 birds.	For consideration.
m73	AVA	There should be similar standards for the outdoor range for meat chickens, as described above for layers.	For consideration.

# Standards and Guidelines B3 Meat and Laying Chicken Breeders

## Key issues:

- Use of conventional cages and other housing issues
- Stocking densities
- Lighting
- Skip-a-day/limited feeding (mentioned in Section A2)

## Section B3 - General Comments

Code	Submitter	Submission	Recommendation
M63	WAP	<p>WAP strongly recommends the following additional standards with additional guidelines to facilitate compliance <u>[see submission for explanation and evidence]</u>:</p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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 darkness during a 24 hour period. All new facilities must integrate natural light.</i></p> <p><i>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.</i></p>	Examine technical information provided within the submission.

		<p><i>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.</i></p> <p><i>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.</i></p> <p><i>SB3.X A person in charge must not use electric wires to train or control birds.</i></p> <p><i>SB3.X A person in charge must provide access for birds to suitable perches or platforms at all times.</i></p> <p><i>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.</i></p> <p><i>SB3.X Beak trimming is prohibited.</i></p>	
m93	HSI	Ban the starvation of breeding birds: Meat chickens that are used for breeding also possess the same genetics that make them grow at an extraordinarily rapid rate, so to ensure they live for a whole year to serve their purpose to breed more birds, they are routinely feed restricted and often just fed every other day. This is clearly fraught with welfare implications, including chronic hunger and suffering, so it is crucial for the draft to incorporate breeds with slower growth rates to begin to address these welfare issues faced by parent chickens.	For consideration.
m29b	RSPCA	<p>The same comments apply to chicken breeders as to layer hens above. This includes that animals should not be kept in barren cages and should be provided with more space than is currently afforded to them, that the birds should also receive a dark period of at least 8 hours continuous darkness in each 24 hour period, and that the maximum stocking densities be lowered.</p> <p>As above, the RSPCA opposes housing animals in barren cages, which have extremely poor welfare consequences for the birds. Their use should be prohibited in the general section which applies to all species</p>	For consideration.
m6	P Fraser	I therefore submit that the following sub-clauses be deleted from the draft standard: Proposed change to Standards: Delete all of SB1 and GB1.1 Delete all of SB3.1 – SB3.4, SB3.8 – SB3.10.	For consideration.
m50, m83	L McKenna, B Van Elburg	Remove SB3.1-3.4 as the community demands an immediate phase out of all caged production systems.	For consideration.

m206	Darwalla	Meat breeders cannot have lighting in nest boxes so this needs to be clarified in the guidelines.	For consideration.
Standard SB3.1			
m200	S Koh	The wording is loose, as what “compromises” health can be subjectively interpreted. Should require a minimum frequency for cleaning out cages.	For consideration.
m144	Dr P Groves	(Also SB3.2, SB3.3) The practice addressed – keeping breeders in cages - is rare in the industry. Associated standards may be more relevant in small-scale fancy breed-keeping.	For consideration.
m63	WAP	Remove.	For consideration.
Standard SB3.2			
m63	WAP	Remove.	For consideration.
Standard SB3.3			
m194	J Sanderson	This is an inadequate height and will not allow injured or dead birds to be humanely disposed of.	For consideration.
m200	S Koh	Again, “normal height” is stupid. Height of cages should be at least 60cm.	
m63	WAP	Remove.	
Standard SB3.4			
m63	WAP	Remove.	For consideration.

## Standard SB3.5

m200	S Koh	Hens should not be housed under artificial light only. Natural light should be required (see comments under A4).	For consideration.
m50, m83	L McKenna, B Van Elburg	Amend Standard- <i>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 8 hours of continuous darkness in each 24-hour period. [cites FBWSR as evidence]</i>	Examine technical information provided within the submissions.
M63	WAP	Modify to read 6 hours of continuous darkness in each 24-hour period (see submission for explanation and evidence)	
m61	SBA	SBA strongly supports the use of midnight feeding (2 hours lights on in the middle of a dark period every 24 hours e.g. 16 hours on, 3 hours off, 2 hours on, 3 hours off) to reduce the impact of high environmental temperatures, particularly in free range situations where environmental conditions cannot be as carefully manipulated as cage and barn systems. Addition of this night time lighting period allows birds an opportunity to eat and drink during the cooler part of the day, which improves liveability and reduces negative behaviours including feather picking.	
m144	Peter Groves	Requires 4 hours minimum periods of darkness but this also needs to be assessed in terms of emerging new research.	

## Standard SB3.6

m200	S Koh	SB3.6 Chickens should not be lifted or carried by the legs/feet either. They should be carried properly as they would in a vet clinic.	For consideration
m50, m83, m63	L McKenna, B Van Elburg	Amend and upgrade Standard- A person in charge must ensure meat and laying chicken breeders are not lifted or carried by the head, neck, wings, feathers or tail feathers unless otherwise supported by the breast.  To prevent muscular or skeletal injuries, Meat and layer chicken breeders must be carried supported by the breast.	

m29b	RSPCA	<p>The following standard must be revised:</p> <p><i>SB3.6 A person in charge must ensure meat and laying chicken breeders are not lifted or carried by the head, neck, wings, feathers or tail feathers <del>unless otherwise supported by the breast</del>, except if lifted and carried by the base of both wings.</i></p> <p>Chickens must certainly never be carried by the head, neck, wing tips or feathers, and this would not be acceptable if they were also supporting the breast. Those body areas are not appropriate to bear the body weight of the bird and is extremely poor practice.</p>	For consideration
Standard SB3.7			
m63	WAP	Remove	For consideration
Standard SB3.8			
m194	J Sanderson	This is inadequate.	For consideration
m200	S Koh	Stocking densities are too high. See comment under SB1.6.	
M73	AVA	SB 3.8 – 3. 9 - as commented above - the minimum cage floor area for caged breeders has not been revised since the 2002 MCOP. 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.	
m83	B Van Elburg	Standards SB3.8 and SB3.9 which specify minimum space requirements for the caged production of chicken breeders must be removed. The community demands an immediate phase out on caged production systems.	For consideration
m63	WAP	remove	

### Standard SB3.9

m194	J Sanderson	A more appropriate maximum allowance for all cage systems (if we cannot remove this production system altogether which would be preferable) would be 25kg/ square meter. (see submission for more information	DG to examine technical information provided within the submissions
m200	S Koh	Stocking densities too high. See comment under SB1.7.	
m63	WAP	Modify to read: A person in charge must not exceed a stocking density of 30kg/m <sup>2</sup> (measured as bird density in the useable area for pullets and adult breeding chickens (see submission for explanation and evidence)	
m73	AVA	SB 3.8 – 3. 9 - as commented above - the minimum cage floor area for caged breeders has not been revised since the 2002 MCOP. 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.	

### Standard SB3.10

m194	J Sanderson	A more appropriate space would be 25kg/m <sup>2</sup> .	For consideration.
m147	Sentient	This is too high and should be changed to 24kg/m <sup>2</sup> .	
m50, m83	L McKenna, B Van Elburg	Amend Standard to incorporate the recommendation of Animals Australia for the minimum stocking density (measured as bird density in the useable area) for pullets and adult birds (including roosters) in non-cage breeder hen systems.	

### Guideline GB3.1

m200	S Koh	Nest density – see comment under GB1.7.	For consideration.
m50, m83	L McKenna, B Van Elburg	Upgrade to Standard and incorporate the recommendations of Animals Australia for the minimum number of nest boxes available for a flock of breeder hens.	



Guideline GB3.2			
m50, m83	L McKenna, B Van Elburg	Remove GB3.2 as the FBWSR notes that broiler breeders are routinely raised on plastic slats, and that the material may partially explain the high incidence of Foot Pad Dermatitis in broiler breeders. <u>[cites the FBWSR as evidence]</u>	DG to examine technical information provided within the submission

# Standards and Guidelines B4 Ducks

## Key issues:

- Access to water for head dipping and wet preening
- Bill trimming
- Handling – specifically using the neck

## Section B4 - General Comments

Code	Submitter	Submission	Recommendation
m63	WAP	<p>The importance of open water to ducks is outlined in scientific evidence (<a href="#">see submission for explanation and evidence</a>). WAP recommends an additional standard:</p> <p><i>SB4.X A person in charge must <b>provide water</b> to allow ducks to dip their heads under water and wet preen, and to clean their eyes and nostrils.</i></p>	Examine technical information provided within the submissions.
m73	AVA	<p>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.</p>	
m93	HSI	<p>The provision of clean water for ducks to swim: Farmed ducks are slaughtered at around 6-7 weeks old whereas they would naturally live for around 12 years. For their short lives they have basic needs, and one of the key essentials for ducks is water. Without water they are unable to clean themselves, and they become more prone to respiratory conditions, crusty eyes, heat stress, or lameness. The draft needs to endorse the provision of pools or troughs for the ducks to swim. Ducks should have access to the outdoors and stocking</p>	

		densities that allow them to express natural behaviours: There should be enough room for ducks to spread their wings and escape confrontation from other birds, as well as carry out natural behaviour including grooming and preening. The stocking density should be such that any association aggression or cannibalism is avoided, and beak trimming is eliminated.	
m73	AVA	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).	For consideration.
m200	S Koh	Bill trimming should not be allowed.	For consideration.
m29b	RSPCA	<p>This is in MCOP: 'Older ducks should be lifted by the neck or wings and they should be supported either by taking the weight of the bird by a hand placed under its body, or by holding the bird with a hand on either side of its body with the wings in the closed position. Once sufficiently developed, lifting by the wings is the best method, providing support is given under their body. Ducks must not be lifted by a single wing. Ducks must never be held or lifted by the legs.' There is no reason for this to be omitted from the current standards and guidelines.</p> <p>The following standard &amp; guideline have been removed from an earlier draft but should be re-included:</p> <p>SB3.2 A person must ensure care is taken in catching ducks to avoid creating panic and subsequent injury or smothering of the birds.</p> <p>GB3.3 Bill trimming should be carried before the birds leave the brooder or rearing accommodation.</p>	For consideration.
Standard SB4.1			
m34	Voiceless	Recommends Standard SB4.1 be amended to also prohibit lifting or carrying of ducks by the neck, unless otherwise supported by the breast.	For consideration.
m29b	RSPCA	Ducks must certainly never be carried by the head, legs, wings or feathers, and this would not be acceptable the breast was also supported as it implies that those body areas are weightbearing. Those body areas are not appropriate to bear the body weight of the bird (even if the breast is also supported), and is extremely poor practice.	

		In the Model Code of Practice, it specified that birds must not be lifted by a single wing, but this has been omitted from these standards. It should be included.  <i>SB4.1 A person must ensure ducks are not lifted or carried by the head, legs, wings, feathers or tail feathers unless otherwise supported by the breast.</i>	
m200	S Koh	[Ducks] should not be lifted or carried by the legs/feet either. They should be carried properly as they would in a vet clinic.	
m113	ADMA	This may be adequate, but the industry would like to have a clear exemption for the depopulation practice in the Standards and Guidelines, that is consistent with the Land Transport of Livestock Standards, Edition 1, Version 1.1 (2012), B10, Specific Requirements for land transport of Poultry SB10.6 (iii) ( <a href="#">see Attachment DMA-Depopulation</a> ).	Examine technical information provided within the submission.
m56a	Name withheld by request	[Summarised] Such a stipulation does appear at odds with the general ideal for all poultry to reduce stress. When weighing, a technology called a wing clamp securely holds a bird by the wings. It is not archaic, it is fairly well known, it does not put undue stress on a birds wings. The birds are held firmly and are not stressed, this is because the procedure can be fast. If one is not permitted to use a wing clamp then the stress will increase as handling a duck or trying to put a duck in an enclosure to weigh them will not be as smooth or as quick as using a wing clamp device. These stipulations may have to be altered to allow smooth and stress free weighing of ducks and other birds.	For consideration.
Standard SB4.2			
m147	Sentient	Remove the word 'routinely'.	
M73	AVA	We support SB 4.2 – that bill trimming must not be done routinely.  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.	For consideration.
m144	Dr P Groves	States that trimming of duck bills will not be routine. Injurious feather pecking can be a serious problem in commercial duck flocks and this practice may be the only way to improve the situation. I recommend that this Standard is worded to except situations where serious injurious feather pecking may be expected and	For consideration

		perhaps only under veterinary advice. Emphasis could be put upon supporting research on feather pecking in ducks to progress improvement and decrease the need for bill trimming.	
Standard SB4.4			
m200	S Koh	Water must be clean, and enough provided to allow ducks to swim, not just merely dip their heads in it or be misted.	Consider technical information provided in submissions
m110, m117	C Davis, J Kendall	Without water, ducks cannot clean properly; they are more susceptible to heat stress, respiratory illness, and crusty eyes leading to blindness and lameness. All farmed ducks must have access to water	
m34	Voiceless	Mandate the provision of access for all ducks to water and the outdoors. Voiceless strongly recommends the inclusion of a Standard requiring the provision of sufficient swimming water for ducks <a href="#">[see submission for more information]</a> .	
m59	Australian Ethical	We strongly support the introduction of the requirement for ducks to be able to <i>'dip their heads under water or misters/showers to allow ducks to wet preen, and to clean their eyes and nostrils'</i> (SB4.4). Ducks are aquatic animals forcing them to spend all their time on land is one of the biggest welfare concerns in intensive duck farming. We also encourage introduction of guidance around access to water bodies as ducks that are unable to sit or swim in water can suffer from lameness, dislocated joints, broken bones and splay legs.	
m73	AVA	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.	
m144	Dr P Groves	Requires the ability of ducks to be able to dip their heads under water. This would require the continuance of the use of trough drinkers and the trenches needed beneath them to avoid massive wet litter problems. Such troughs quickly become contaminated and are extremely unhygienic. These conditions are associated with higher levels of disease in duck flocks. There is much spillage and wastage of water with trough systems. If water medication for a bacterial disease becomes necessary, this system requires a multiplying of the medication dose rate to achieve an adequate dosage per duck. This is wasteful of antibiotics, increases their use rate and the possible development of bacterial resistance to them and compromises the responsible use of antibiotics. There may be alternative systems under development (water sprays for example) that may be	For consideration.

		able to meet the perceived duck needs and not provide the unhygienic consequences involved with present systems. A gradually progressive approach here may be a better outcome.	
Standard SB4.6			
m200	S Koh	Stocking densities are too high, and should not exceed 17kg/m <sup>2</sup> .	For consideration.
Guideline GB4.2			
m147	Sentient	This should only be performed under anaesthesia by a veterinarian, and with long term pain relief, as this is an act of surgery.	
m73	AVA	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.	
Guideline GB4.4			
m34	Voiceless	As noted in the RIS, there is currently limited access to water surface systems in Australia, with duck-specific feeding and drinking equipment not readily available. As a result, many duck farms reportedly use drip feeders designed for chickens that do not actually allow ducks to bathe, clean or swim. Voiceless recommends that priority be given to research and experimentation on surface water systems in Australia and, accordingly, that Guideline GB4.4 be converted to a Standard.	Consider technical information provided in submissions.
Guideline GB4.8			
m34	Voiceless	Guideline GB4.8 be amended so that handling young ducks and ducklings by the neck is not suggested nor permitted.	For consideration.
m73	AVA	GB 4.8 – if groups can be picked up by the necks, then SB 4.1 should apply – i.e. supported by the breast.	

# Standards and Guidelines B5 Emus

## Key issues:

- Housing, access to food
- Painful procedures and humane killing

## Section B5 - General Comments

Code	Submitter	Submission	Recommendation
m73	AVA	There should be a standard requiring appropriate shade provision for emus.	For consideration.
m29b	RSPCA	<p>The following standard has been deleted from an earlier draft but is an important standard for animal welfare and should not be cut out. Emus need shade and protection from the elements in order to ensure their welfare. In the minimum standards in the Victorian DPI code of practice, it states that ‘Emus that are kept in yards or an extensive range must be provided with adequate shade and protection from the elements’. There is no welfare reason that the present standards should not provide emus with appropriate shade and shelter.</p> <p>SB4.2 A person in charge must ensure that emus are kept in yards or an extensive range with adequate shade and protection from the elements.</p> <p>Similarly, the following standards have been cut from the current draft:</p> <p>SB4.4 A person in charge must ensure an emergency delivery system is able to deliver adequate supplies of water in the event of a power failure.</p> <p>SB4.5 A person in charge must ensure emus are electrically stunned or made unconscious by captive bolt prior to bleeding.</p>	For consideration.

		These are all important to reduce risks to bird welfare and should not be removed, although SB4.5 should be amended to be firearm or sedation followed by captive bolt or decapitation for adults, and captive bolt or sedation followed by decapitation or bleeding to ensure death for young birds	
Guideline GB5.4			
m34	Voiceless	It is inappropriate to allow newly hatched emu chicks to have access to feed only once every 48 hours, and Guideline GB5.4 must be amended to limit this period to less than 24 hours.	For consideration.
Guideline GB5.8			
m29b	RSPCA	[This] guideline should be included as a standard for all species, and be reduced to 15ppm.	For consideration.
Guideline GB5.15			
m200	S Koh	Emus, like all farmed animals, should have access to natural daylight. This business about only providing artificial lighting is abuse.	For consideration.
Guideline GB5.17			
m34	Voiceless	Recommends converting GB5.17 to a Standard.	For consideration.
Guideline GB5.18			
m29b	RSPCA	A standard should be included on handling:  A person in charge must ensure emus are not lifted or carried by the head, neck, wings, feathers or tail feathers	For consideration.



## Guideline GB5.22

m200	S Koh	Toe trimming and other removal of body parts should not be allowed.	For consideration.
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## Guidelines B5.29

m34	Voiceless	Recommends introducing Standards to prohibit the use of blunt force trauma as a means of stunning poultry, amending Guideline GB5.29, which currently encourages using blunt force trauma to stun young emus.	For consideration.
m80	Dr K Smith	Move to standards.	For consideration.

# Standards and Guidelines B6 Geese

Key issues:

- Stocking density
- Handling

Standard SB6.3			
Code	Submitter	Submission	Recommendation
m29b	RSPCA	<p>As indicated above for other species, the following standard should be amended so that birds are never lifted by inappropriate, non-weight-bearing body parts such as the head.</p> <p><i>SB6.3 A person must not lift or carry geese by the head, neck, legs or feet, wings, feathers or tail feathers <del>unless</del> otherwise supported by the breast.</i></p>	For consideration

## Standard SB6.6

m135	Peel Ridge Stud Waterfowl et al	<p>Amendment: SB6.6 <i>A person must ensure the maximum recommended stocking densities for geese are according to housing type and under good management conditions and as follows;</i></p> <table><tr><td><u>Age</u></td><td><u>In housing (indoors)</u></td></tr><tr><td>Goslings – to 10 days</td><td>12 birds/m<sup>2</sup></td></tr><tr><td>Goslings – at 8 weeks</td><td>2 birds/m<sup>2</sup></td></tr><tr><td><b>Broiler Goslings – up to 65 days (10 weeks) to a maximum of 115 day (17 weeks)</b></td><td><b>2 birds /m<sup>2</sup></b></td></tr><tr><td>Breeders</td><td>2 birds/3 m<sup>2</sup></td></tr><tr><td><u>Age</u></td><td><u>In runs</u></td></tr><tr><td>Goslings - at 8 weeks</td><td>1,250 birds/ha or 500/acre</td></tr><tr><td>Breeders</td><td>250 birds/ha or 100/acre</td></tr></table>	<u>Age</u>	<u>In housing (indoors)</u>	Goslings – to 10 days	12 birds/m <sup>2</sup>	Goslings – at 8 weeks	2 birds/m <sup>2</sup>	<b>Broiler Goslings – up to 65 days (10 weeks) to a maximum of 115 day (17 weeks)</b>	<b>2 birds /m<sup>2</sup></b>	Breeders	2 birds/3 m <sup>2</sup>	<u>Age</u>	<u>In runs</u>	Goslings - at 8 weeks	1,250 birds/ha or 500/acre	Breeders	250 birds/ha or 100/acre	Consider technical information provided with the submission.
<u>Age</u>	<u>In housing (indoors)</u>																		
Goslings – to 10 days	12 birds/m <sup>2</sup>																		
Goslings – at 8 weeks	2 birds/m <sup>2</sup>																		
<b>Broiler Goslings – up to 65 days (10 weeks) to a maximum of 115 day (17 weeks)</b>	<b>2 birds /m<sup>2</sup></b>																		
Breeders	2 birds/3 m <sup>2</sup>																		
<u>Age</u>	<u>In runs</u>																		
Goslings - at 8 weeks	1,250 birds/ha or 500/acre																		
Breeders	250 birds/ha or 100/acre																		

## Guideline GB6.2

m29b	RSPCA	<p>The following guideline should be a standard for all species:</p> <p>GB5.2 At all times geese should be handled by competent experienced handlers so that they are not disturbed unduly.</p>	For consideration.
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## Guideline GB6.4

m200	S Koh	It must be ensured that any dogs used are appropriately trained and do not harm the geese.	For consideration.
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## Guideline GB6.7

m34	Voiceless	For the purposes of consistent interpretation, Guidelines GB6.7 and GB6.8 must be clarified, as they are seemingly contradictory to Standard SB6.3. In line with this Standard, the Guidelines should clearly stipulate that all breeds of goose must be supported by the breast when carried.	For consideration.
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## Guideline GB6.8

m34	Voiceless	As above guidelines should clearly stipulate that all breeds of goose must be supported by the breast when carried.	For consideration.
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# Standards and Guidelines B7 Guinea Fowl

## Key issues:

- Handling
- Stocking density

### Standard B7.1

Code	Submitter	Submission	Recommendation
m200	S Koh	[Guinea fowl] should not be lifted or carried by the legs/feet either. They should be carried properly as they would in a vet clinic.	For consideration.
m29b	RSPCA	The following standard should be revised:  <i>SB7.1 A person must not lift or carry guinea fowl by the head, legs, neck, wings, feathers or tail feathers <del>unless otherwise supported by the breast.</del></i>	For consideration.

### Standard B7.2

m200	S Koh	Guinea fowl should not be kept in cages. Stocking density for adults in cages is too high, and should be no higher than the stocking density of adults not kept in cages.	For consideration.
m29b	RSPCA	The following standard should include 'stocking densities must not exceed...'  <i>SB7.2 A person must ensure the maximum stocking densities <del>for guinea fowl are according to housing type and under good management conditions and as follows;</del> do not exceed:</i>	For consideration.

		As indicated in comments for other species, the RSPCA opposes animals being kept in barren cages. This also applies to guinea fowl, where stocking densities are specified for cage facilities. A general standard in section A should be included to prohibit housing any poultry species in cages.	
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# Standards and Guidelines B8 Ostriches

## Key issues:

- Humanely dealing with leg injuries
- Promoting guidelines to standards
- Provision of shade and appropriate stocking density

Section B8 - General Comments			
Code	Submitter	Submission	Recommendation
m73	AVA	There should be a standard requiring appropriate shade provision for ostriches. There is no mention of housing density for ostrich chicks.	For consideration.
m39b	AVPA	Guideline GB5.9 from emu section should also be added to the ostrich section.	For consideration.
m29b	RSPCA	<p>The following two standards have been removed from an earlier draft, but should be included.</p> <p>SB7.3 A person in charge must ensure feathers, including the wing feathers, must not be removed by cutting from the live bird by untrained people.</p> <p>SB7.4 A person in charge must ensure the feathers must be cut no closer than 10 mm to the bloodlines. Feathers without a ripe bloodless clearance above the bloodline must be left on the bird. All other feathers must be removed post-mortem.</p> <p>A standard must be included to specify incorrect handling methods, as in other species sections, i.e. A person must not lift or carry ostriches by the head, legs, neck, wings, feathers or tail feathers.</p>	

## Standard SB8.1

m200	S Koh	Add to end of first sentence ' <i><b>in consultation with a vet.</b></i> '	For consideration.
m73	AVA	SB8.1: Suggest rewording to: <i>If the bird has difficulty rising or walking and has significant heat, pain and swelling, <b>veterinary advice must be sought</b> or the bird must be humanely killed.</i>	
m39b	AVPA	This standard only relates to leg rotation. Suggest that it may also be applicable to other causes of lameness that result in ' <i>difficulty in rising or walking</i> '.	
m29b	RSPCA	Following revision recommended:  SB8.1 A person must ensure where a bird <b>is in an irrecoverable state of pain such as a</b> <del>has suffered</del> leg rotation, it must be <b>promptly treated</b> <del>managed</del> . If the bird has difficulty in rising or walking and has significant heat, pain and swelling <b>in the leg</b> , the bird must be humanely <b>and promptly</b> killed.	For consideration.

## Guideline GB8.1

m34	Voiceless	Unlike other species-specific Standards, the best methods for handling emus, ostriches and turkeys are only included as Guidelines in their relevant sections. Considering the potential stress and injury associated with direct human interaction and inappropriate handling of larger species, and for consistency throughout the proposed S&G. Convert to a Standard.	Consider in light of technical information provided in the submission.
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## Guidelines GB8.12 – GB8.13

m200	S Koh	These guidelines should apply to all farm animals.	For consideration.
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## Guidelines GA8.14

m200	S Koh	Water should be included.	For consideration.
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## Guideline GB8.17

m83	B Van Elburg	Move to standards.	Consider in light of technical information provided in the submission.
m29b	RSPCA	<p>The below standard should be amended – decapitation is not a humane method of killing as consciousness may persist for up to 30 seconds.</p> <p><i>GB8.17 When necessary, chicks should be humanely killed by <b>captive bolt gun or by</b> dislocating the cervical spine by a person experienced in this technique. <del>Alternatively chicks can be decapitated.</del></i></p> <p>This should also be included as a standard – proper methods for euthanasia and who may perform it</p>	For consideration.

## Guideline GB8.18

m83	B Van Elburg	Move to standards.	Consider in light of technical information provided in the submission.
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## Guideline GB8.19

m83	B Van Elburg	Move to standards.	Consider in light of technical information provided in the submission.
m29b	RSPCA	<p>Assumedly captive bolt guns are also appropriate for humane killing where close restraint is possible.</p> <p>The following guidelines have been removed, although it would be beneficial to include guidelines for best practice and minimising risk to welfare during killing.</p>	For consideration.

		<ul style="list-style-type: none"> <li>• never fire while the bird is moving its head; wait patiently for a quiet interval before firing;</li> <li>• to provide maximum impact and the least possibility of misdirection the range should be as short as circumstances permit;</li> <li>• it is not safe to press the firearm on the head</li> </ul>	
Guideline G8.20			
m83	B Van Elburg	Move to standards.	Consider in light of technical information provided in the submission.

# Standards and Guidelines B9 Partridge

## Key issues:

- Handling
- Consistency across species
- Beak trimming

## Section B9 - General Comments

Code	Submitter	Submission	Recommendation
m29b	RSPCA	The standards and guidelines are still extremely inconsistent between species. Some species include quite a lot of detail whereas others such as partridge have very few standards and guidelines. Assumedly, this is due to the input by various industries. This needs to be rectified and a similar level of detail included for all species by including more comprehensive standards and guidelines to reduce the risks to poultry welfare for all species.	For consideration.
m29b	RSPCA	<p>In current MCOP: A8.2 Beak Trimming</p> <p>Every effort should be made to avoid beak trimming by the appropriate selection of birds and the provision of conditions which reduce the tendency for adverse traits, such as cannibalism, to occur.</p> <p>Beak trimming should be performed only by an experienced operator or under the direct supervision of an experienced operator. The development of an accreditation training program for the industry is strongly encouraged.</p> <p>To prevent cannibalism up to one-third of the upper beak may be removed within 72 hours of hatching.</p> <p>These guidelines should be included</p>	For consideration.

Standard SB9.1			
m29b	RSPCA	<p>The following revision should be made:</p> <p><i>SB9.1 A person must not lift or carry partridge by the head, legs, neck, wings, feathers or tail feathers <del>unless otherwise supported by the breast.</del></i></p>	For consideration.

# Standards and Guidelines B10 Pheasants

Key issues:

- Beak trimming

Section B10 - General Comments			
Code	Submitter	Submission	Recommendation
m29b	RSPCA	<p>In current MCOP: A8.2 Beak Trimming</p> <p>Every effort should be made to avoid beak trimming by the appropriate selection of birds and the provision of conditions which reduce the tendency for adverse traits, such as cannibalism, to occur.</p> <p>Beak trimming should be performed only by an experienced operator or under the direct supervision of an experienced operator. The development of an accreditation training program for the industry is strongly encouraged.</p> <p>To prevent cannibalism up to one-third of the upper beak may be removed within 72 hours of hatching.</p> <p>These guidelines should be included.</p>	For consideration.

# Standards and Guidelines B11 Pigeons

## Key issues:

- Racing weather conditions
- Racing plans and exceptions for rural and semi-rural areas
- Water after exercise

## Section B11 - General Comments

Code	Submitter	Submission	Recommendation
m29b	RSPCA	<p>There is no maximum stocking density included for pigeons where there is for other species.</p> <p>There are a number of standards which have been deleted from an earlier draft and should be re-introduced:</p> <p>SB10.1 A person in charge must ensure free non-flight time, is done under direct supervision.</p> <p>SB10.2 A person in charge must ensure persistent fielding and or roof sitting is not done.</p> <p>SB10.4 A person in charge must not administer any performance enhancing drug to a racing pigeon including any of the anabolic steroids or corticosteroids.</p> <p>SB10.6 Racing pigeons must be housed within a loft, designed to provide adequate and appropriate shelter and accommodation for the birds.</p> <p>Perches and nest boxes should also be provided and included as standards.</p> <p>Current MCOP includes: A10.4 Beak Trimming</p>	For consideration.

		<p>Every effort should be made to avoid beak trimming by the appropriate selection of birds and the provision of conditions which reduce the tendency for adverse traits, such as cannibalism, to occur.</p> <p>Beak trimming should be performed only by an experienced operator or under the direct supervision of an experienced operator. The development of an accreditation training program for the industry is strongly encouraged.</p> <p>The tip of the cock bird's beak may need to be trimmed to prevent injury to a timid hen.</p> <p>A10.5 Transport</p> <p>A10.5.1 Transport crates for squabs should be of a maximum height of 15 cm and should provide a minimum floor space of 200 cm<sup>2</sup> /bird</p> <p>A10.5.2 Adult pigeons require a minimum of 450cm<sup>2</sup> /bird floor space during transit</p>	
Standard SB11.5			
m111, m119, m209, m210, m211,	ANRPB and stakeholders	<p>We request that the words <b>heavy, lingering</b> be inserted before “fog” in the second line of this standard [<a href="#">see justification in submission</a>]</p>	For consideration.
Guideline GB11.9			
m39b, m73	AVA, AVPA	Question why there is an exception for birds housed in rural and semi-rural areas.	For consideration.
m200	S Koh	State what the exercise and racing plans should include (e.g. access to food and water?).	For consideration.

Guideline GB11.18			
m39b	AVPA	Pigeons should also be provided water after exercise.	For consideration.



# Standards and Guidelines B12 Quail

Key issues:

- Killing
- Housing
- Stocking density

## Section B12 - General Comments

Code	Submitter	Submission	Recommendation
m13	Banyard Game Birds	Killing – in our operation we kill the bird by decapitation, and place the dead bird in ‘killing cones’ to bleed out, and restrict spasms. It is a quick process with minimal stress to the bird. I have travelled extensively to the USA and Europe investigating alternative killing methods e.g.:- ‘electric stunning’, ‘Gas stunning’ and ‘Low Atmosphere Pressure stunning’. The word ‘stunning’ is used universally, however from my observations the reality was inevitably death to the bird and in my opinion, not any more humane or less stressful or quicker than decapitation, or dislocation of the neck. I also point out that the methodology of killing will need to vary with the scale, and equipment utilized in each abattoir.	For consideration.
m13	Banyard Game Birds	Breeding birds in cages. It must be recognised that quail, unlike poultry, have <u>no</u> nesting or brooding tendencies whatsoever. Running breeding quail in a deep litter, or free range environment would result in extensive faecal contamination of eggs and the associated salmonella, and campylobacter risks. In my opinion, breeding cages for quail should be single tiered only, and be furnished with generous ‘dust bath’ facilities.	For consideration.
m13	Banyard Game Birds	Catching, handling and transport of quail to the slaughter needs very careful consideration. In my opinion, the maximum time from catching the quail, to slaughter should be 4 hours.	For consideration.

m83	B Van Elburg	<p><i>Quail to be raised in an enriched environment including height that allows for flying and sawdust bedding.</i> - Standard.</p> <p><i>Quail to have some shelter available.</i> - Standard.</p> <p><i>Quail to be provided with 200 cm<sup>2</sup>/bird.</i>- Standard.</p> <p><i>Quail to be raised in an enriched environment including height that allows for flying, 2.5 cm sawdust bedding, sand- bathing area, perches and wood nests measuring.</i> – Guideline <u>[evidence from the FBWSR provided]</u>.</p>	Consider the technical information provided in the submission.
Standard SB12.2			
m29b	RSPCA	<p>A person must not lift or carry quail by the head, legs, neck, wings, feathers or tail feathers <del>unless otherwise supported by the breast.</del></p>	For consideration.
Standard SB12.3			
m200	S Koh	<p>Stocking densities are again too high. They equate to 100 adults/m<sup>2</sup> (or 100cm<sup>2</sup> per adult bird), which is stupid.</p>	For consideration.

# Standards and Guidelines B13 Turkeys

## Key issues:

- Handling
- Stocking rates
- Painful procedures (beak trimming and toe trimming)

## Section B13 Turkeys – General comments

m63	WAP	Excessive stocking rates and wire based or slatted floors are of concern in the draft Standards for turkeys, as is minimum light intensity. WAP recommends the following additional standards <u>[see submission for explanation and evidence]</u> :  SB12.X A person in charge must provide partial floor area that is solid for adult turkeys, in case of breeding stock the whole of the floor should be solid.  SB12.X A person in charge must provide a minimum light intensity of 20 lux during light periods.	Examine technical information provided within the submission.
m66	Ingham's Turkey	The main areas of concern to the turkey industry with the S&G as currently drafted relates to the proposed overly restrictive maximum densities (SB13.5) that are not supported by conclusive scientific evidence and are inconsistent with internationally applied standards; as well as the proposed restrictions on toe trimming (SA9.11) which require modification to limit the negative animal welfare impact due to reduced management options being available.	Examine technical information provided within the submission.
m73	AVA	There should be outdoor standards for free range turkeys in the same way as described previously for layers and meat chickens.	For consideration.
m46	G Arzey	Appropriate pop hole sizes should be included for turkeys and species other than chickens.	For consideration.

m110, m117	C Davis, J Kendall	Turkeys are bred to develop fast. They become so heavy they struggle to move. Crowded sheds make turkeys aggressive. Selective breeding for maximum breast meat has led to lameness, because the birds are crippled by their weight. The draft standards should be rewritten to enforce the breeding of natural, smaller and slower growing species to alleviate problems with fast growth. Beak cutting should be banned. Improved housing and husbandry should reduce aggression and injuries. There should be more space and environmental enrichment with perches, straw bales and flooring materials to scratch in so that the turkeys can live as normally as possible.	For consideration.
m93	HSI	<p>[Summarised] Slower growth rates: One of the most significant welfare problems within the turkey industry is selective breeding for rapid growth to reach heavier final body weights in exceedingly shorter periods of time. Selective breeding means that turkeys can reach slaughter weight by just 10 weeks. Rapid growth and heavy body weight can compromise the health of turkeys. These devastating effects on their health and wellbeing often mean they are unable to even mate naturally. The draft should ensure the production of slower growing birds to eliminate these unnecessary welfare problems.</p> <p>Ban beak trimming: Stocking density should allow enough space for the birds to exhibit natural behaviour and reduce aggression.</p> <p>Enriched environment: Turkeys should be provided with perches and enough other environmental enrichments (such as bales of straw) in order to prevent the development of injurious pecking and the need to beak trim.</p> <p>Treatment of Turkeys during Slaughter: Evidence from studies of chickens demonstrates that the process of inversion and shackling is both stressful and painful, and the wingtips may become bruised if turkeys flap while being hung. When shackled turkeys are conveyed through the water bath, they may experience electric shocks before they are stunned into unconsciousness, because their wings, hanging lower than their heads, may touch the water before their heads are submerged. The use of nitrogen gas systems, rather than passing turkeys' heads through electrified water baths, are in use by some processing plants in the United States and Europe, and these efforts should be commended for improving the animals' welfare. The shackling of turkeys and the use of water baths should therefore be replaced with more humane alternatives <a href="#">[see submission for suggested alternatives]</a>.</p>	For consideration

m29b	RSPCA	<p>The following standard should be included as a bare minimum:</p> <p>Toms must not be overstimulated during semen collection, or injury may result. Any toms that have shown cloacal bleeding during collection should be rested for 3-4 days.</p> <p>Key guidelines on acceptable methods of handling should also be included as standards to reduce risks to bird welfare for all species.</p> <p>The following proposed guideline should be included as a standard, and standards included for all species on appropriate and inappropriate handling including catching methods: Turkeys should not be caught and dragged by the head or neck, or be thrown, swung or dropped into a crate or module.</p> <p>Guidelines on humane killing have been deleted and need to be re-included as standards. This includes:</p> <p>GB12.25 Neck dislocation of turkeys up to 8 kgs should only be performed by those trained and experienced in this practice.</p> <p>GB12.26 Turkeys over 8 kgs should be killed by fire arm, captive bolt or a cash poultry killer by appropriately licenced personnel.</p>	For consideration.
Standard SB13.1			
m200	S Koh	Surely people engaged in artificial insemination need proper qualifications and certification.	Suggest including example of 'relevant knowledge, experience and skills' within the S&G.
Standard SB13.1			
m10	ADO	See also SB13.2 regarding turkeys: ' <i>A person performing artificial breeding procedures on turkeys must take reasonable actions to minimise pain, distress or injury.</i> ' Little to no guidance	See requests for definitions of 'reasonable' and 'reasonable actions' in Section A1 and in the glossary.

		as to what may constitute ‘reasonable actions’ in this context is provided in the ‘GB13’ guidelines.	
Standard SB13.3			
m200	S Koh	Turkeys should not be lifted by the legs. They are too large for their legs to support their own weight.	See Guidelines on Handling.
m29b	RSPCA	<i>SB13.3 A person must not lift or carry turkeys by the head, neck, wings, feathers or tail feathers <del>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.</del></i>  Exceptions to be carried by the tail feathers, neck, leg and a wing are unacceptable	For consideration.
m66, m67, m81	Ingham’s Turkey, Ingham’s Meat Chicken, ATF	The current wording is unclear in that ‘for vaccination’ could be read as applying to all three exceptions. Adding reference to artificial insemination covers this standard practice more explicitly.  <i>A person must not lift or carry turkeys by the head, neck, wings, feathers or tail feathers unless otherwise supported by the breast. <b>Except when lifted:</b></i>  <i>- by the tail feathers and neck or</i>  <i>- by a leg and a wing (incl. for artificial insemination) or</i>  <i>- by the base of both wings for vaccination.</i>	For consideration.
Standard SB13.5			
m200	S Koh	Again, stocking density is appalling high and should not exceed 34 kg/m <sup>2</sup> . Intensive farming should be banned; all animals should have sufficient space to move around and flap their wings. All sheds should have sufficient natural light, and all turkeys should have access to an outdoor area.	For consideration.

m39b	AVPA	<p>Remove ‘<i>good management conditions</i>’ because these are not defined, or defined in other sections.</p> <p>-The word ‘<i>intensive</i>’ in the footnote should be removed and re-phrased to require ‘mechanically ventilated sheds’ to have fans and foggers. This definition is in accordance with meat chicken standards. The densities should be clarified to ensure that they apply to tunnel ventilated or mechanically ventilated sheds only.</p> <p>- There is another footnote that ‘<i>density of open-sided sheds should be less than the above intensive densities</i>’. ‘Open-sided’ sheds should be re-worded to ‘naturally ventilated sheds’. Curtain-sided sheds may classify as ‘open-sided’ but it is really whether the housing includes methods of temperature control (fans, foggers etc.) that is relevant.</p>	Consider incorporating these suggestions into SB13.5.								
m67, m66, m81	Ingham’s Turkey, Ingham’s Meat Chicken, ATF	<p>Recommended change: <i>A person must ensure the maximum recommended stocking densities for turkeys are according to housing type and under good management conditions and as follows:</i></p> <table><tr><td><i>Live weight</i></td><td><i>Bird density in useable area</i></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>There is only limited research available on the topic of density in turkey farming and its effect on animal welfare. We would consider the type of evidence reported in the FBWSR as insufficient to support the restrictive minimum density scale proposed in the draft standard. It seems reasonable to extrapolate from the broiler research and conclude that management factors may also be more important than stocking density alone on the welfare of turkeys [<u>see further information/evidence presented in the submission</u>].</p>	<i>Live weight</i>	<i>Bird density in useable area</i>	<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>	For consideration, and review technical information provided in the submission
<i>Live weight</i>	<i>Bird density in useable area</i>										
<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>										
m120	Ingham’s	<p>I am concerned that the substantially reduced density for turkey broilers currently proposed in the draft S&amp;Gs does not give adequate consideration to the scientific evidence, the severe operational implications to large scale farming of turkeys and the internationally applied standards. I am of the view that the alternative density scale for turkeys proposed by the Australasian Turkey Federation in its submission is an appropriate compromise for the national poultry standard.</p>	For consideration.								

## Guideline GB13.2

m66, m67	Ingham's turkey, Ingham's chicken meat	Remove this guideline GB13.2. While adding whole grain or coarse cereal fragments are an option that is often practised, it is not appropriate to set this as an animal welfare guideline since it does not relate to welfare. Also note that it is not part of the draft S&G applying to meat chickens, presumably for that very reason.	For consideration.
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## Guideline B13.4

m200	S Koh	Appropriate litter/bedding should be provided, or are you proposing that keeping turkeys on a hard concrete floor, in a dark shed, is humane?	Recommend a guideline about litter (or check this is covered in the general ones).
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## Guideline GB13.5

m200	S Koh	Nesting area is too small. How can five breeding hens fit in a space 44 cm x 44 cm?	For consideration.
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## Guideline GB13.10

m200	S Koh	See comments under GB1.3: Turkeys should not be lifted by the legs. They are too large for their legs to support their own weight.	For consideration.
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## Guideline GB13.11

m200	S Koh	Beak trimming should not be allowed.	For consideration, in line with overall submissions to do with beak trimming, including technical information provided.
m39b	AVPA	This guideline for turkeys should also be expanded and included in the laying chickens section.	Recommend including this in guidelines in other sections.



### Guideline GB13.12

m200	S Koh	Beak trimming should not be allowed.	For consideration, in line with overall submissions to do with beak trimming, including technical information provided
m29b	RSPCA	<p>Include the following as a standard:</p> <p>GB12.14 Beak trimming must only be performed if all other measures to prevent injurious pecking have been undertaken (including by the appropriate selection of birds and the provision of conditions which reduce the tendency for adverse traits to occur). When performed, beak trimming must be performed only by an experienced operator or under the direct supervision of an experienced operator.</p>	For consideration.

### Guideline GB13.14

m200	S Koh	This should be a standard, requiring that toms must be rested if injury has occurred.	Standard SB13.2 already says that reasonable actions must be taken to minimise pain, distress, or injury. For consideration.
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### Guideline GB13.15

m200	S Koh	Beak trimming should not be allowed.	For consideration, in line with overall submissions to do with beak trimming, including technical information provided.
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### Guideline GB13.18

m200	S Koh	Turkeys should not be carried by their legs! If needed to be held upside down their body should be supported.	Given that GB13.20 specifies this handling for birds under 5 kg, suggest amending guideline to include reference to weight and provide support for larger birds.
m34	Voiceless	Recommend converting to Standard.	For consideration.

### Guideline GB13.19

m34	Voiceless	Recommend converting to Standard.	For consideration.
m29b	RSPCA	<p>GB13.19 <i>When catching poults, the catching technique should ensure;</i></p> <ul style="list-style-type: none"> <li><i>poults are caught by both legs</i></li> <li><i>no more than <del>8</del> 6 poults should be carried at once.</i></li> </ul> <p>6 at an absolute maximum.</p>	For consideration.

### Guideline GB13.20

m34	Voiceless	Recommend converting to Standard.	For consideration.
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### Guideline GB13.21

m34	Voiceless	Recommend converting to Standard.	For consideration.
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m67	Ingham's meat chicken	Guideline should be removed since it is not in line with the current Land Transport Standard which states "Turkeys ... may be lifted by the tail feathers and neck or by a leg and a wing."	For consideration.
Guideline GB13.22			
m34	Voiceless	Recommend converting to Standard.	For consideration.

# Glossary

Code	Submitter	Submission	Recommendation
m16	C de Fraga	'Barn' systems are mentioned as one of 3 egg-production systems on p.11 (Principles of poultry welfare) but 'barn' is not qualified or included in the glossary.	Recommend defining barn systems within the glossary.
m197	PROOF	The Glossary within the draft code defines <b>Beak Trimming</b> as <i>"The removal of the tip of the beak of poultry by specially designed equipment to prevent cannibalism and its associated vices."</i> Together, [the] Standard and related glossary definition are misleading and deceptive. If it is permissible under the Standard to remove one third of both the upper and lower beaks, the glossary definition must reflect this. The current definition would serve to deceive consumers as to the welfare status of the birds.	For consideration.
m177	J Johnson	Clear definitions of ' <b>Bedding</b> ' vs ' <b>Litter</b> ' should be made. Bedding is clean raw material used and has no bird faeces on it. "Litter" is that bedding with faeces on it. Reused litter – is bedding that has been defecated on and is being reused as a bedding – but is now called reused litter.	Recommend clearer definitions of litter and bedding within the glossary
m29b	RSPCA	<b>Cages:</b> <i>A system of housing where the birds are confined to cages either singly or in multiples with a wire floor. <del>With this system the stock do not come into contact with their own or other bird's faeces which is an important disease control measure.</del></i>  The above strikethrough text should be deleted. This is irrelevant to the definition, and also applies to non-cage systems with slatted flooring.	For consideration.
m16	C de Fraga	The Glossary includes a description of the 3 systems of egg production: conventional cages, free range (non-cage systems) and housing systems (non-cage systems). The description of ' <b>cages</b> ' states: <i>"A system of housing where the birds are confined to cages either singly or in multiples with a wire floor. With this system the birds do not come into contact with their own or other bird's faeces <u>which is an important disease control feature.</u>"</i> I believe the statement I have [underlined] should be removed as it is not part of the description but rather a judgment. If it remains, then free range/non cage systems/housing should include the statement that they allow birds to stretch and flap their wing and walk, which are important welfare attributes of non-cage systems (and, according to the FBWSR, some basic movements that are prohibited in conventional cages also contribute to bird health).	

m29b	RSPCA	<p><b>Cannibalism</b> <i>The practice by some birds of <del>attacking and</del> eating other members of the same flock.</i></p> <p>Cannibalism does not include agonistic behaviour or attacking, it is just eating.</p>	For consideration
m39b	AVPA	<p><b>Desnooding</b>, <b>‘dubbing’</b>, <b>‘despurring’</b> and <b>‘web marking’</b>. These are technical terms, which should be defined in the glossary.</p>	Recommend including definitions of these practices in the glossary
m29b	RSPCA	<p><b>Pop hole:</b> <i>A small opening that provides access between indoor and outside areas.</i></p> <p>Pop holes are not necessarily small, and on the contrary, need to be large enough to prevent smothering, allow good visibility onto the range, and encourage access to the range.</p>	For consideration
m29b	RSPCA	<p><b>Poultry:</b> <i>Following bird species reared or bred in captivity: chickens, ducks, emus, geese, guinea fowl, ostriches, partridges, pheasants, pigeons, quail and turkeys. Birds that are kept in captivity for any reason, including those that are kept for shows, races, exhibitions, competitions or for breeding or selling.</i></p> <p>By this definition, all pet birds are considered poultry and would be covered by these standards.</p>	For consideration
m206	Darwalla	<p><b>Skip-a-day feeding.</b> The glossary definition of this practice is incorrect and very misleading: <i>“Removing feed for 8-24 hour periods during the starter period which reduces early rapid growth and meat yield in broiler chickens.”</i> This definition must be rewritten to accurately reflect the practice. It is a practice of feeding two days of rations on alternate days to meat breeder birds, not broiler chickens. The overall nutrient intake is not compromised during this procedure.</p>	For consideration

## Appendix 4- New insight submissions summary

The drafting team identified 48 submissions that provided ‘new insight’, or that provided an additional contribution to the consultation process beyond that in the ‘short’ submissions. The Consultant has developed the following summary. It should be noted that each submission was coded in its entirety so themes that were also identified in the major and ‘short’ submissions also appear here. The full list of ‘new insight’ submissions is provided in Appendix 7.

### Do not ban conventional cages

#### Preference for cage eggs

- Farmers are best placed to look after hen welfare so I can have access to eggs I choose. Oppose any bans on current production methods. Preference for cage eggs as cheaper, cleaner, more sustainable (n2, n14, n46, n48).

#### Banning cages risks biosecurity

- Diseases like Avian Influenza are a risk esp. in free range farms. If cages banned and AI breaks out, we could have egg shortage (n2, n14, n46, n48).
- From the air, ground and elements, birds at high risk of disease. If event, controlling a disease from spreading in free range virtually impossible (n21).
- Sheds are controlled environments so limiting disease spread is easy (n21).

#### Legislate current standards (hence maintaining conventional cages)

- Legislate current standards (n2, n14, n46, n48).

#### Eggs will be more expensive and affect people on low incomes if conventional cages are banned

- Cost effective way for low income earners to obtain eggs (n16).
- Banning cages will make eggs more expensive and affect poor families. [Addressing RSPCA] “*Why would you care if Australian kids go hungry? You only care about the job "Animal welfare" creates for you!*” (n31).
- For people on low incomes, price premium for cage-free is prohibitive. After bills are paid, the amount left for food is very small, choices can be few. Removing cage production will lead to greater obesity. Retain current market where people can make informed choices based on their circumstances (n35).
- Poor Australians cannot afford expensive boutique-produced versions. Arguably the planet cannot feed 7 billion people if we rule out low cost, low impact methods of egg production (n28).
- It is the more affluent areas that can afford a free range carton of eggs (n21).

#### Cage system is efficient

- Production output and costs is really, really good compared to other systems. Hens lay more than in barn or free range (n28).
- Mass production of eggs in cages is more economical than free range and less space is required – keeps them affordable (n21).

### Caged hens have good welfare

- Stressed hens don't lay eggs. Well managed cage hens often lay two eggs per day, ergo they are happy. RSPCA is engaging in anthropomorphism. Hens are happier, healthier and live longer than in barns or free range environments (n28).
- Any farmer knows and understands that a happy animal is a productive animal (n21).
- Caged birds live in environmentally controlled environment, clean feed and water available 24/7. Safe from predators. Eggs produced in clean circumstances with minimal handling (n21)
- Free range birds risk threat of attack from predators, competition for food and water from large social groups in one area. Disease threat is high from other animals (n21).

### Caged eggs are safer to eat

- Health risks from delayed collection in free range *"I ate a boiled free range egg that made me so sick, I was paralleled (sic) for 3 days, had s\*\*t and vomited all over, couldn't move, nobody knew I was there, I was on my own and genuinely though I was going to die!"* ... (n31).

### Banning cages will create flow on effects in the WA economy

- [Identifies 27 sectors that would be affected eg truck drivers, computer technicians], increased production costs will mean loss of jobs and further impacts on the economy. We don't want to have to import eggs from another country without safeguards. Common sense at the head of the agenda (n16).

### Retailers promoting non-caged eggs are motivated by profit

- Selling "free range" gives supermarkets an increased profit margin (n21)
- [summarised] Mirroring the Tesco UK model, Coles has taken curious animal 'welfare' positions this year that have caught the attention of media, regulators and food producers in a range of sectors from dairy, through beef, chooks and eggs and most recently pork. Jackie [Healing] said that welfare was an important niche for Coles. "If you link welfare to a perception, you'll drive sales," she said. Thus Coles says it has given us 'hormone free' beef (an oxymoron and misleading), sow stall free pork and free range poultry and now cage free eggs. Ethically any position of 'trust' in any relationship must be driven by the truth and not by 'perceptions', commercial dissembling and outright bulls\*\*t. Trust without truth is an empty vessel (n1).

### Ban cages

- I believe that battery cages should be completely outlawed in Australia, after an appropriate lead-in time for adjustment (n25).
- [photo of Lachlan, age 7 with sign *"free the cage hens"*] (n32).
- [letter from child age 7; It's cruel to keep chickens in cages. *"I have lovely free range chickens – makes me sad their friends are locked up"*] (n17).
- The RSPCA urgently recommends that a standard be included in chapter B1 – Laying Chickens to ensure that battery cages for layer hens are phased out, and a standard included in Part A – 4 Facilities and Equipment, to prohibit housing any birds in conventional cages (n5).

### Cages are unethical

- Animals are 'smart', we don't have a right over these animals. We have a responsibility towards them. I see [current industrial farming practices] as my generation's version of slavery. It is tough to be the one to stop and say 'we have taken advantage too long'. I think it takes work for people to look away and think 'I guess that's what needs to happen to keep meat on my plate at an affordable price'. I don't think you as an interpreter or creator of policy can look at our policy and think 'we are doing well for all'. People need their leaders to make the brave decisions they cannot (n9).

- [Many famous philosophers/thinkers have supported animal sentience and vegetarianism] (n10).
- [My published research] showed that chickens are sentient beings which feel joy, pain, fear and frustration. The expression of these emotions was quite clear even to persons who had previously had little contact with chickens. Further, we have a moral obligation to enable other living things to avoid experiencing negative emotions and physical pain and danger. This means banning both intensive layer conditions and intensive meat production (n30).
- [Summary] Animals suffer. Battery cages cause suffering (physical and mental). Either a) It is not ok to inflict this suffering on a sentient being- therefore battery cages must cease to be used. Or b) Continue to use battery cages, that is thereby condoning the inflicting of suffering on chickens in order to earn a profit. The use of battery cages is a shameful situation where society has voluntarily turned a 'blind eye' to industry maximizing their profit and convenience at the expense of animal welfare. *"At Easter, we celebrate 'new hope' and 'peace' with the image of newly hatched fluffy yellow chicks and eggs, where in reality to commercially produce eggs, freshly hatched female chicks have their beaks sliced with a hot blade and are condemned to a 14 month existence in a cage before being slaughtered. Male chicks upon hatching are separated and either thrown alive into a grinder or suffocated to death in bags"* (n38).
- There is an abysmal lack of ethics in the economics of animal industries. Economics ... determines the fate of millions of battery hens inhumanely confined in cages for life, as well as the routine grinding up of live male chicks ... the inherent cruelty of this process from start to finish is completely immoral (n18).
- A cage is no place for a living creature! The practice of keeping chickens or hens in cages is wrong (n42).
- I support a reduction in the number of people that can immigrate to the Australian continent per year, if necessary, in order to make sure that the chickens of hens can live their naturally normal behaviour. Otherwise it is wiser to look for non-animal food sources (n42).
- Chickens don't deserve to suffer (n43). Battery hen lifestyle is cruel (n11).
- It seems very wrong to me to keep our egg producers imprisoned in small quarters for the entirety of their productive lives and to use commercial hybrid hens designed to produce in the extreme to the point that they only live a fraction of their natural lifespans or are culled due to productive issues (n22).
- Ultimately these animals will be used for our human consumption. We owe them the best life available (n11).
- I am so proud to be part of a movement of people who no longer will tolerate the untold hardship forced onto animals/birds as part of our food production industry, and implore you to bring about free range conditions for all hens, and meat production birds, as a matter of urgency (n8).
- Locking up animals because we've found it's the sleekest production method to get the best output is not something we should be proud of. They're not potatoes destined for salt & vinegar snack packs (n12).

#### Cages do not meet welfare needs

- What battery cages can't do, is meet the welfare needs of hens; and the science absolutely agrees battery cages are indefensible from a welfare point of view (n5).
- I think it's the right time to ban cages. Chickens in cages live lives of misery, suffering no sun, painful broken bones, painful feet, crippling confinement, intense boredom, and mutilated beaks (n23).
- There is extensive research into the effects of battery cages on the physical and mental welfare of the hen. Cages do not provide even the most basic needs of the animal [see technical information provided in the submission] (n29).
- I wish to express my hope that improvements can be made to better support hens, with a greater focus on quality of life. There is no quality of life for a battery hen. Not only are they fed bare minimum, their feet and legs are not supported and they are forced to constantly lay, which is not natural and is exhausting for their tiny bodies. They suffer immensely as they are unable to carry out activities that come naturally to them like scratching the ground and spreading their wings. When updating the



standards: no more battery cages; time outside; enough room to carry out natural behaviours; darkness when it is night time (n20).

*Cages cause stress and frustration*

- Battery cages cause stress and frustration. Hens in battery cages suffer high levels of stress and frustration because they're unable to perform simple natural behaviours like walking, nesting, perching, stretching their wings, scratching the ground, and foraging. Hens suffer in battery cages where they can't perform these behaviours because their natural instinct to nest, perch, dust bathe and forage is so very strong (n5).
- Greater signs of physiological distress and fear have been detected among chickens inside cages, which shows up in tonic immobility (n33, n34)

*Cages don't prevent feather pecking/cannibalism*

- We don't need battery cages to prevent pecking and cannibalism. Feather pecking and cannibalism are serious risks in all housing systems, including where hens are crammed together in battery cages. There's no evidence cage-free hens are more prone to feather pecking than caged hens – locking hens in small cages just limits their contact with other hens. We can't justify locking hens in barren battery cages to limit the risk of feather-pecking when the battery cages themselves cause so much suffering. Other housing systems maintain the low risk of feather-pecking while also allowing hens to behave normally (n5).
- Farmers in caged systems are powerless to prevent caged hens from attacking each other violently (n34).

*Protection from predators not a good enough reason for cages*

- We don't need battery cages to protect hens from predators. There are many, many examples of good cage-free systems (both indoor and outdoor) that provide adequate protection from predators. We can't justify condemning hens to suffer in barren battery cages for their entire lives, under the guise of protecting them from predators. Battery cages have no benefits over alternative housing systems that meet the needs of hens, and no benefits that aren't also achieved by a well-managed cage-free system. Larger, 'enriched' or 'furnished' cages – such as those used overseas – do have some benefits. But our industry has chosen instead to continue using small, barren battery cages, which cause chronic suffering for layer hens (n5).

*Cages cause disease*

- Confined in cages, egg laying hens commonly live with untreated broken bones, can be attacked by other stressed birds and can't stand without discomfort or pain. As the Victorian state government science report (FBWSR) states, cages can cause high instances of claw breakage and lead to cases of fatty liver, which can cause sudden death (n26).
- Bone quality is significantly reduced in battery cage housed hens, as well as other disorders (provides references in the submission (n29)
- Cages lead to reduces bone strength; layer fatigue ... refers to a variety of bone disorders (from the FBWSR) (n43).
- We don't need battery cages to control disease. Reducing the risk of disease does not mean that hens should be restricted from behaving normally. Other housing systems can maintain the low risk of disease while also allowing hens to behave naturally. Caged hens have a lower risk of infectious disease because they're held off the ground in wire cages and don't have the opportunity to interact with many other hens. Hens in battery cages do, however, suffer high levels of chronic diseases, such as bone disease (osteoporosis) and a fatal fatty liver condition, which is brought about by stress and lack of movement (n5).
- Low air quality in intensive cage environments may elevate the risk of infection in chickens (n34).
- Chickens in cages suffer from fatty liver haemorrhagic syndrome, are susceptible to bone breaks (n33).
- A hen who is injured or infected is routinely left to suffer without medical care, and may die (n13).

### *Cages prevent natural behaviours*

- We don't need battery cages to reduce mortality. There's more to good welfare than just survival, and we don't need to deprive hens of normal movement and behaviours to reduce mortality. Battery caged hens may live, but in very poor conditions that cause them great suffering; whereas some housing systems that allow hens to behave normally actually have lower mortality than battery cages. Hens in cage-free systems can enjoy their lives without the suffering and frustration caused by battery cages (n5).
- These behaviours are very important to hens: to have the freedom to interact naturally with other birds, lay their eggs in a private place, forage for their natural foods and flap their wings freely. A review of the current science had these insights: "[a cage] prevents birds from performing basic movements essential for good health (walking, wing stretching)". Chickens' most natural requirements are not met when they live in caged systems (n26).
- Chickens in cages are prevented from showing fundamental behaviour like rudimentary movement (n33).
- Hens need to be able to sunbathe, exhibit normal social behaviour like interacting naturally with other birds and move around and seek out new experiences. Chickens have much more sophisticated behaviours than many people realise. I don't think that cages enable chickens to demonstrate normal behavioural patterns. Agonising boredom, stress, and extreme frustration are just some of the emotional impacts hens experience inside cages (n13).
- According to RSPCA Australia, "Hens in battery cages ... are deprived of the space and materials they need for nesting, perching, foraging or dustbathing. They cannot walk freely, fully stretch out or flap their wings, fly, hide, or move away from other hens. Denying hens the ability to perform these normal behaviours causes them immense frustration and suffering." (n19).
- On pp. 11-12 of the draft standards, there is a section on the 'Principles for Poultry Welfare', which spells out that egg-laying hens deserve to be provided with accommodation that meets their basic physiological and behavioural needs, and lets them socially interact with other poultry. Chickens are unable to socialise properly or display natural behaviours when they are confined to a cage or in an overcrowded shed (n44).

### *Other regions/countries have banned cages*

- The rest of the world is moving well away from cages for egg production (n24).
- The European Union (EU) legislated to phase out battery cages by 2012, with the UK having met this target and the European Commission threatening non-compliant member countries with legal action. In 1981, Switzerland established new requirements for the housing of chickens which came into effect in 1991, effectively eliminating battery cages in Switzerland and making aviaries the most common method of raising hens (n4).
- Voters in the US state of California have approved a ban on battery cages by 2015, and as of July 2010, California also requires all eggs sold in the state to comply with the requirement that hens must be able to stand up and fully extend their wings. Michigan has also followed suit, committing to a phase out of battery cages by 2019, and in 2010, Ohio, America's second-largest egg-producing state, enacted a moratorium against the construction of new battery egg facilities (n4).
- I wish to draw your attention to new legislation developed in New Zealand, who are leading the way in expectations of how humans should treat animals:  
[http://www.legislation.govt.nz/bill/government/2013/0107/latest/DLM5174807.html?path=bill%2fgovernment%2f2013%2f0107%2flatest&col=bill&fid=DLM5174807&search=sw\\_096be8ed81047b83\\_sentient\\_25\\_se&p=1](http://www.legislation.govt.nz/bill/government/2013/0107/latest/DLM5174807.html?path=bill%2fgovernment%2f2013%2f0107%2flatest&col=bill&fid=DLM5174807&search=sw_096be8ed81047b83_sentient_25_se&p=1) (n20).
- The European Union decided in 1999 to phase out battery cages, and they have been prohibited there since 2012. New Zealand began phasing out their use in 2012. Canada and some states in the United States are moving towards cage-free production (n19)

### Cages damage Australia's international standing/reputation

- Australia is one of the few first world countries where this incredible cruel practice continues. It is sad that we are leading the world in terms of cruelty when so many others realise how important it is to ban this (n4).
- For the most part, Australian State and Territory ministers have refused to recognise that these devices are blatantly cruel. This is in stark contrast to developments overseas where battery cages are being outlawed. The ACT have completely prohibited the use of battery cages, with Tasmania prohibiting any new battery hen operators from 2013 (n4).
- Australia will be looked on favourably for this forward-thinking choice (n43).
- The horrific cruelty of the commercial battery chicken industry is a disgrace for Australia (n18).
- Other countries will be taking notice of the decision you make. Please make the right choice (n23).
- As a wealthy first world country, Australia can afford to and has no excuse not to model best practice animal welfare (n41)
- Australia claims to be a leader in animal welfare. The reality is that we are lagging behind other nations (n36).
- Australians like to think of themselves as animal lovers, yet we now trail much of the developed world in maintaining this cruel practice, with some 11 to 12 million hens still kept in barren wire cages. It's time the industry "got with the program", responded to community demand and produced eggs in a humane way (n19).
- In Australia, where everyone believes in the concept of a "fair go", surely we can extend that to the animals who give their lives to enhance ours, and provide us with key elements of our diet (n19).

### Banning cages is based in science

- The code must be based on current scientific knowledge of animal physiological, psychological and emotional needs (n41, against cages).
- Credible scientist support a phase out of cages on the basis of animal welfare (n43).

### Cages are affecting industry social licence

- Cages are making the industry look bad. It will better reflect public sentiment (n43).

### Cage-free eggs can be affordable

- Cage-free eggs don't cost much more. It will cost you just \$22 a year to switch to cage-free eggs, and many brands of cage-free products are now cheaper than those made with battery cage eggs (n5).
- I understand why some families - doing it tough - still choose the caged (cheaper) eggs. Feeding our families comes down to money too. With that, I live in hope that some would forfeit the extra bag of fun-pack chips each week and pay the difference to support owners of the free range laying hens (n12)
- Done right, pricing of free range eggs should come down and allow use of longer living healthier breeds (n22).
- I believe the cost of rising egg prices will be outweighed by the drastic increase in hen welfare and egg quality. It is past the time where money is more important [than] the lives and health of other beings countrywide (m29).

### Cage-free eggs are safe and nutritious

- Cage-free eggs are just as safe. The greatest food safety risks come from storage and handling – not the production method. In fact, many scientific studies have shown confining hens to battery cages can actually increase the risk of salmonella (n5).
- Cage-free eggs are just as nutritious. There's no nutritional difference between cage and cage-free eggs (though some people think cage-free eggs taste better) (n5).

### Opposition to caged eggs is growing

- There is a clear indication from the egg-buying public that opposition to this method of egg production is growing. An article in the Sydney Morning Herald of 4 January 2017 reported that caged eggs now account for less than half – 49.5% - of all grocery egg sales by volume, down from 74.9% a decade ago (n19).

### Farmers should be supported to move away from cages

- I realise that some producers will need assistance to transition from cage to free range, but I believe that there must be subsidies and interest free loans available to these farmers, to keep their businesses afloat and our agriculture industries flourishing (n8).

### The community will not accept furnished cages

- You should know that Australians will not accept so-called colony or furnished cages either. Apparently countries that introduced colony or furnished cages have already begun to phase them out. Investing in a system that other countries are already getting rid of would be such a waste and a further step backwards. In colony cages, hens:
  - can't move freely
  - are restricted from foraging
  - are still in a cage
  - can't nest in private
  - have about the same space per hen as in a battery cage
  - are denied many behaviours important to them (n26).

## Other issues

### Chickens have additional needs beyond the code

- The following basic needs should be added: Physical contact with other members of the species, such that poultry can meet their species-species needs for communication with others of their species; The ability to nurture their offspring until such as time as the young are weaned (n41).

### Other housing/husbandry issues

#### *Decrease stocking densities*

- My poultry welfare policy: Every grown up chicken or hen shall be given at least 10 square meters of space in an egg producing business environment beginning tomorrow! (n42).
- Drop the number of chickens allowed in each meter square. Keeping a hundred chickens into 5 square metres is wrong (n33).
- Maximum stocking densities be decreased for all species, so that each individual bird has more room to move and express their normal behaviours (n15).
- It is not enough to get birds out of tiny wire cages. They must have enough space to express normal behaviours, and the standards as proposed do not do this. Why go through this whole consultation/standard development process and not end up with something to be proud of? (n19)
- The stocking densities for caged birds are woefully inadequate to avoid causing serious distress to a bird. The minimum single bird cage specification of one square metre translates to a cage that could be as small as 33.3cm by 33.3cm by 40cm tall. Based on the objective of minimising impacts and threats to the welfare of poultry it is time to either vastly increase the allocation of space for caged birds or begin phasing out the use of cages permanently (n37).

- I urge you to change the code around the amount of space turkeys are given. Turkey farms have way too many birds squashed into a small space and unsurprisingly these birds live a stressful existence, with a lack of individual care and an increased rate of infection and disease. Turkeys should have more space to express their natural behaviours and better care (n39).

#### *Provide perches*

- Give them perches. Scientists say this would improve bone health (n33).
- The inclusion of a standard in chapter 4 – Facilities and equipment to ensure adequate perch space must be provided to all poultry with a motivation to perch (n5).
- While proposed guidelines recommend that perches be provided, they are not required as standard, so the instinctive perching behaviour of hens will not necessarily be accommodated. Why can the standards not accommodate such a basic drive as a requirement rather than an optional extra? (n19).

#### *Provide nests*

- The RSPCA urgently recommends that guideline GB1.6 become a standard in Chapter 4 – facilities and equipment to ensure that hens of all species must be provided with a nest (n5).
- Why a recommendation for nests rather than an enforceable standard? Why is it so hard to say, these are the needs of this animal, so they will be catered for in the use of the animal in food production? (n19).

#### *Increased lighting*

- Increasing the lighting in sheds so that the birds are more likely to move around. It's outrageous to discover that meat producers keep the lights down at four times below the level scientists recommend then the research is out there showing that adequate lighting is critical to optimal hen welfare (n33).
- The amending of standard SA6.3 in chapter 6 – Lighting to ensure that the minimum light intensities for all poultry be increased to at least 10 lux, and amending standard SA6.5 to require 8 hours of continuous darkness in each 24-hour period for all poultry (n5).
- The lighting required in the standards is inadequate to allow for normal behaviours and eye development. Ask the average supermarket customer what they think about hens being kept in near darkness for most of their lives, and I am confident the vast majority would be horrified. Again, time for the industry to understand that their customers expect animal welfare issues to be taken seriously in all food production sectors (n19).

#### *Provision of litter*

- The inclusion of a standard in Chapter 8 – Litter management that ensures all poultry housed indoors must have access to a littered area to allow birds to forage and dustbathe (n5).
- The purpose of getting hens out of battery cages is to allow them to engage in natural behaviours, such as foraging and dustbathing. The lack of a standard for the provision of litter for all poultry housed indoors is a serious omission which should be addressed (n19).

#### *Alternate day feeding*

- It's clear that 'skip a day' feeding is cruel under any circumstance and I disagree that it's ever "acceptable"! Hens are chronically hungry, so depriving them of food is cruel. Combined with this, their unnaturally rapid growth means they grow so enormous that they can't physically carry their own weight (n44).

#### *Moulting*

- Standards must be introduced to ensure that poultry are not forced to moult (n15).

### *Painful procedures should be banned/pain relief used if necessary*

#### *Beak trimming*

- Debeaking can cause acute and chronic pain, particularly in older birds, due to tissue damage and nerve injury. In addition to the pain caused during and immediately following amputation, scientists believe the process can cause the beak to develop long-lasting and painful neuromas or tumours, which deter hens from using their beaks to forage or exhibit other natural behaviours (n6).

- Beak trimming should be undertaken only if necessary, and only with adequate pain relief. The use of pain relief for all painful procedures should be mandatory (n25).
- Stricter standards must be introduced around beak and bill-trimming to ensure that it is not performed unless necessary for animal welfare reasons, and it is performed appropriately, with minimal impacts on the birds. Preferably, no beak cutting (n15).
- This is a ghastly practice which should be reserved for animal welfare issues only. Standards should be introduced recognising the pain it causes and ensuring its use is kept to a minimum (n19).
- Beak trimming simply should not be permitted. It's easy to see that having a part of your body cut off is cruel. Better husbandry and reduced stocking density – along with genetic selection – can undo the problems beak trimming is intended to solve (n44).

#### *Dubbing*

- Can the inhumane practice of dubbing please be stopped. Its only purpose is to present game fowl as they originally would have when used for fighting. As fighting is now illegal there is absolutely NO reason for the cruel practice of dubbing being allowed (n3).

#### *Treatment of male chicks is wrong*

- Not to mention the awful way that male chicks are killed gassed or macerated between rollers and staggeringly there are approximately 12 million male chicks killed this way each year (n6).
- The use of grinding machines to kill baby birds should be specifically outlawed (n25).

#### *Slaughter should be humane and monitored*

- The slaughter of any animal needs to be undertaken only by humane procedures, where the details of the acceptable method are very clearly specified, for instance specifying the maximum time within which death must occur (n25).
- CCTV cameras to be strategically installed in all slaughterhouses and abattoirs (n5, n19, n25).
- Shackling turkeys upside down is not okay. Turkeys have already fragile legs from being grown so fast that their bodies can't cope. Hanging them up by their legs for any period of time puts them at extreme risk of bone breaks. Please ban shackling (n13).
- Slaughtering old layer hens and broiler chickens involves shackling, electric-bath immobilisation, and bleeding from a cut neck, before being dragged through tanks of boiling water to remove their feathers. What doesn't get talked about is how often regulations fail horribly - resulting in horrific animal suffering: hens that aren't dead by the time they get to the vats (possibly because they're taking longer than an assigned time to 'bleed out') are plunged into boiling water alive. Why won't the Australian poultry industry transition to other, less horrific, means of killing the animals they make their income from? I want hens to be protected from this abuse in slaughterhouses (n13).
- Need specifications for electrical waterbath and controlled atmosphere stunning systems (n5).
- Designated animal welfare officers in all abattoirs (n5).
- More requirements are also needed in chapter 10 – humane killing to include unacceptable methods (n5).
- The final hours of a meat chicken or caged hen's life is even worse than most people could imagine. The possibility of being boiled alive? How is it possible that the Australian poultry industry thinks it's acceptable to slaughter animals like this? I want chickens to be protected from this terrible abuse in slaughterhouses (n39).
- There are a couple of killing processes to stop chickens being boiled alive: gas and another called Controlled Atmosphere Killing. Controlled-atmosphere killing is a process whereby oxygen is gradually removed from the hen's crates. Unconsciousness occurs slowly and is far less traumatic. Controlled-atmosphere killing is apparently not like the gas chambers used to kill pigs so inhumanely, because it



doesn't flood them with poisonous levels of gases. Rather the animals pass out due to the removal of oxygen before having to go through horrific abuse, like being dropped live into boiling water (n39).

### Ducks need access to sufficient water

- Every animal has basic needs, ducks included. Ducks need access to sufficient water to be able to swim and submerge their bodies. Splay legs and loss of their centre of gravity are common conditions ducks suffer as a result of water deprivation. The proposed changes to duck farming do not adequately improve this problem (n23).
- Ducks need enough water to be able to swim and bob their bodies under the water. Depriving them of water is inhumane (n13).
- I was shocked to learn that ducks raised for meat usually don't get access to water for swimming. Deprivation of water often leads to serious health conditions such as blisters and skin burns. Please give these animals plenty of water (n39).

### Need mandatory code/standards

- You can do something to stop this abuse, you can mandate guidelines that actually reflect the real community expectations, not the ones the businesses that make the money are paying someone to say that this is the safe and reasonable treatment of a living conscious creature (n6)
- A mandatory Code is the only acceptable Code to meet current Australia's animal welfare laws. Must require standards to meet or exceed animal welfare requirements in the state and territory legislation (n41).
- Requirements to be made mandatory, not recommended guidelines (n25).
- I call for the lawful requirement of industry to adequately provide for the needs of normal behaviours of chickens (n14).

### Mistrust of process

- You are the governing body who makes and enforces the rules, Please do not leave it up to the money hungry industry to control these poor souls fate (n11).
- The industry continues to profit from mistreated poultry and to apply pressure to Government to maintain the status quo (n18).
- Industry is too influential. Ethical decisions cannot be made with objective scientific research is not presented. The Australian Government's reputation for animal welfare is extremely poor. I hope this consultation will not be a fruitless exercise which has no impact on the outcome. I have concerns over the independence of AHA. I urge you to listen to the evidence and not just a selection of industry funded findings (n36).
- I also note that there are 7 steps in this process and there is every likely hood that at one of those steps my and many other submissions may get 'lost' in translation. I hope this will not happen as I think that would be a very sad underestimation of the views of the community in relation to this topic (n37).
- I was unable to locate the draft Standards and Guidelines in order to comment on them, nor was I able to locate contact number to request a copy. It does not bode well for a review that does not make the draft available during the public consultation period (n41).
- The reason for the existing animal cruelty on the Australian continent and generally globally are the unfair land allocation policies upheld by foolish academics, people and politicians (n42).

### Government monitoring and enforcement body to be established

- There should be some government-funded body to actively enforce the standards (n25).
- Sufficient funding for effective auditing of compliance is essential (n41).

### Spent hens

- Then at approximately 18 months of age, their laying capabilities start to diminish and they are then slaughtered as they are deemed useless (n6).
- The poor half bald and crippled hens soon bounced back to full plumage, and learned how to stretch their feet on the soft earth, where they could peck around for insects and green pick, along with their supplied feed. THEY WERE IN HEAVEN!! (n8)
- Purchased 1 year old birds from a caged egg farm. Both birds were in quite poor condition when we bought them having only a smattering of feathers and appearing on the verge of scrawny. We released them to free range in our back yard and within 2 months both birds had full plumage returning and became extremely robust and even social in their interaction with members of my household. Having seen the poor state of the birds compared to the healthy and stress-free state of same birds I - like many Australian's - can no longer hold the view that caged poultry is an acceptable practice (n37).

### We should support free range

- Is it too hard, too dangerous, too expensive, too profitless to run free range farming? I feel it takes a brave, hardworking soul to choose to offer organic and free range produce. But that is who this country should support (n12).

### End all animal farming

- Profits should always come last in the animal agriculture equation. ALWAYS (n7)
- If you cannot farm animals without causing them to suffer; without providing for them an environment for them to express and engage in their natural behaviours. Then animal agriculture should not exist (n7).
- The science is out, and has been out for a while. Animal agriculture causes more harm than good, to the greater earth, and therefore to us and the rest of the earth's inhabitants. Not forgetting to mention the enormous suffering it creates (n7).
- Future generations will look at factory farming, and our current total and utter disrespect for animals, and nature at large, with bewilderment, and disgust (n7).
- The greatest single change the human collective can do right now, that will affect the most benefit for the environment, and for all; that will give us the best chance of survival on this fragile planet, is to stop eating animals! (n7).
- Humans can live happy and healthy lives without consuming the products of the poultry industry (or any other animal industry) (n48).
- No matter what farming "system" is used to raise chickens and other birds, whether caged, barn or "free range", they all suffer and they all die in a slaughterhouse at a fraction of their natural lifespan. No regulation of animal farming can ensure the wellbeing of animals who do not want to die. It is contradictory to care for the welfare of animals enough to protect them from being horrifically treated in battery cages, but not from the ultimate harm of death (n48).
- All of the options under consideration in this review assume that the breeding, raising and killing of poultry will continue indefinitely in Australia. I propose that another option be included, one to phase out the farming of chickens and other birds. This proposal is based on the science of animal sentience and nutritional science (n48).

### General

- There are probably some caring, conscientious owners of battery caged hen farms. There are probably free range chicken farmers who keep them in dangerous, atrocious conditions. I find both these situations repulsive. Does fixing it come down to a) education b) ensuring environments and people are fit to run layer hens and c) where and how money gets earned and spent? (n12).



- The discussion at the consultation meeting was guided by the presenter to only discuss caged/free range egg production, and other welfare standards did not get much discussion
- The unnatural rate of growth of chickens raised for meat places major stress on their skeletal system (n33).
- In section 3 [Risk management, SA3.1] there is a broad reference to the welfare of poultry that has a stated objective to “minimise the impact of threats to their welfare” and yet there is no reference to one of the key areas of poultry wellbeing and that is minimising stress on the birds. Poultry that are distressed will exhibit obvious and repeatable symptoms that if left untreated can result in serious threats to their welfare. For this reason stress management should be included in this section (n37).

## Appendix 5: Themes from short submissions

General comments in the public submissions, unrelated to specific standards or guidelines (coded as 's' (for short) submissions) contained some common themes. Submissions were received from all walks of life, from children to the elderly, backyard chicken owners/current/previous. Feedback about rescue chickens/condition of rescue chickens etc.

As part of the sampling process, Animal Health Australia, who performed the initial analysis and summary of the electronic submissions, provided the Consultant with a list of the common themes:

### General

- The majority of submissions implied that the term “poultry” means caged egg laying hens or meat chickens. This is supported by so few references to “other” poultry e.g. ducks, geese, turkeys etc.
- A significant number of submissions cc'd in their local member and asked their views be shared with the jurisdiction's agriculture minister.
- A significant number of submissions expressed appreciation for the opportunity to have their say on this issue

### End cages

- Conventional cages - Must end/please stop/ban/set free
- Submissions from children supporting a ban on cages
- Responses from Organic/vegan/vegetarian/ or not vegan or vegetarian but still support a cage egg ban
- Surprised still happens/occurs/ society has progressed/ we are an educated society
- How are cages still legal/should be illegal/caged egg producers should be prosecuted
- EU/UK/NZ/Canada are phasing cages out/ Australia is being left behind other countries/ the world is watching

### Cages do not provide good welfare

- Chickens need more room/space/be free to walk/dust bathe/scratch/fly/interact with other birds /lay eggs in peace/stretch wings (given 25cm need 75) /search for feed (e.g. seeds or insects)
- Cages bad for the mental wellbeing of the bird/ miserable/ mental trauma/ boredom/ distress/psychological distress
- Cages and lack of exercise cause alarming amounts of fatty liver hemorrhagic syndrome resulting in internal bleeding/ osteoporosis/ poor air quality leads to infections and the spread of disease/ depresses immune system
- 18 months of crippling confinement causes fractures in caged eggs/ Egg-laying hens are often left to suffer debilitating injuries like broken vent or chest bones. This is a bigger issue in cages than other systems/ 1/3 birds have fractured bones at slaughter/ bone fractures cause chronic pain even after they are set.
- Welfare issues are inherent to the cage system itself not like husbandry practices in other farming systems / caged chickens are handled roughly by staff
- Reference to the copied piece from the Huffington Post: "Some bird's skeletal systems become so weak that their spinal cords deteriorate and they become paralyzed; the animals then die from dehydration in their cages."

- RSPCA scientific study/ Victorian scientific study suggests cages are bad for wellbeing and hens are unable to perform natural behaviours. ["[a cage] prevents birds from performing basic movements essential for good health (walking, wing stretching)"/ "A journal article reviewed by RSPCA notes that cages can never fulfil hens' behavioural needs".
- Individual veterinary care is impossible for caged birds/ adequate veterinary care not practical in cages
- Statements from Voiceless Unscrambled article – particularly on 'disuse osteoporosis' and bone fractures from calcium depletion by chickens being in cages
- Most common cause of death in caged chickens is diseases and bacterial infections due to the environment they live in
- cages considered to cause cannibalism/farmers cannot prevent birds attacking each other or aggression/ dead birds left to rot under caged birds
- The draft's assertion or conclusion that draft allows chickens to "stand, lie and stretch their wings and limbs and perform normal patterns of behaviour" is incorrect if a chicken is in a cage.
- Diseases re cages/growth promotants/hormones/ filled with antibiotics/ slow the unnatural growth rate
- Colony cages/furnished are not acceptable/ 'A cage is a cage'/ Introduced in other countries who are now phasing out/ investing in cages is risky and could be phased out just like other countries (e.g. NZ, Germany, Switzerland)/ Any ordinary person would say a colony cage is a cage
- Draft outlines in the 'Principles for Poultry Welfare' section that hens should be provided with accommodation that provides them with the ability to "stand, lie and stretch their wings and limbs and perform normal patterns of behaviour", but the new Standards are far from enough to satisfy this responsibility.

#### Ethical issues/relationship with animals

- Conventional cages considered to be - Cruel/inhumane/suffering/barbaric
- Chickens feel pain/sentient/intelligent /can experience REM sleep and dream/recognize 100 or 50 faces/exhibit empathy/curious/ are problem solvers/ have complex social hierarchies
- Cages are slavery/ equivalent to human slavery
- Animals sacrifice their lives for human consumption – e.g. Pigs/ /dairy cows/live export/factory farms
- Putting themselves/ourselves in the position of the chicken – "how would you feel/like it"
- References to dogs and cats/no animal deserves a cage /not natural
- Karma
- Quotes – Religious, Bible
- Chickens are considered a domestic pet / I love my chickens
- Mention of hens "forced" to lay a large number of eggs per year. Well in excess to their natural laying capacity and referencing genetic modification as the root cause.

#### Inhumane killing/slaughter

- Chickens are boiled alive/male chicks killed/killed poorly/ Slaughtering practices changed to Controlled Atmospheric Killing – 'a more compassionate method'/ Ban shackling/Water electrification/ cruel/ slaughter houses should have 24hr independent CCTV
- Reference to the ABC 7.30 report in regards to exposing harsh processing techniques of chickens

### Consumer behavior/issues

- Happy to pay more for free range eggs/I only buy free range eggs/Free range eggs taste better
- Support free range systems/happy/healthy eggs and chickens
- Labelling/stocking rates need to improve/free range in the shops doesn't mean chickens are 'free range'
- Use of Choices "Cluck AR App"
- Grocery shoppers reminded of cruelty every shopping trip.
- 2.5/3 cents per egg is economically viable

### Housing, stocking density, lighting

- Reference to the number of animals (chickens) permitted per square meter- this space allowance has not been upgraded since 1983.
- Chickens require Sunlight/daylight/ constant light is abuse/ SA6.4 and 5 contradict each other/ 24hrs of artificial light is unnatural/ hens get 4 x light levels below what scientists recommend/
- chickens feet pain/ should not be housed on wire

### Community support

- I have wanted this for a long time/ signed many petitions already/ I have always cared about animals
- Banning cages called for by major welfare organisations (e.g. Animals Australia, Humane Society International, Voiceless, Animal Liberation, World Animal Protection, RSPCA)
- Do something Australia will be proud of/ Australia can do better/ Most Australians want caged eggs banned (84%/ 4 out of 5)
- Have the courage/do the right thing/ listen to the public/ major political opportunity/ I vote based on welfare policy/ the government should take responsibility

### Consumer behaviour

- Major companies are banning caged eggs/shift in corporate policy by large commercial food retailer/service providers (e.g. Aldi, Nestle, Unilever, Subway, Woolworths, McDonalds, McCain, The Coffee Club, Grill'd, Hungry Jacks)
- Caged egg producers will commercially fail anyway/ no future for caged egg businesses/ lost patience with egg producers/listen to the market/ ethical producers suffer by doing the right thing/ unpopularity could be a liability for the cage egg industry / "according to the Australian Egg Corporation caged egg sales continue to trend downwards."

### Concerns about bias

- Stakeholder/government or NSW collusion to draft the standards and guidelines/ political corruption / investigate immediately/ how can the community have faith in the system/ References to ABC 7:30 report on this issue
- Standards and Guidelines do not reflect modern science which 'overwhelmingly suggests chickens should be out of cages'/Law reviewers have a responsibility or duty to adhere to science/ Animal behaviorists or 'World Class Scientists' research clearly indicates cages cause suffering

### Industry change

- Least number of chicken producers will be affected (4%) – ABS statistic/ only benefits the large companies/ 10 million birds will have better welfare
- Welfare is more important than financial gain/profit

### Other issues

- Broiler chickens grow too fast resulting in health problems (e.g. joint dislocation/bone breaks/starvation)/ Slower growing chickens should be introduced
- Broiler Chickens with perches have improved overall health/ Broilers need lower stocking densities
- Water for ducks is required to perform natural behaviours/ need to self-regulate/preen
- Depriving ducks from water is inhumane and can lead to serious health concerns including splayed legs, blisters and loss of their centre of gravity.
- Turkey meat industry is cruel/ turkeys too large for legs and can't stand/ shackled while killed/ need more space

## Appendix 6 – List of major submissions

m1	Ginny Jankowski	public	S&G comment
m2	Alex Greenwich MP (NSW Minister for Primary Industries)	MP	general submission
m3	Graham Rickuss	public	S&G comment
m4	Bert Sheridan [see m40 for updated submission]	public	S&G comment, general submission, papers
m5	Greg Poole	consultant	general submission
m6a	Peter D Fraser	public	RIS questions
m6b	Peter D Fraser	public	S&G comment
m7	Adam Joseph	public	general submission
m8	Dawn Lowe, Animals' Angels	welfare	general submission
m9	Shane Rattenbury MLA, Minister for Consumer Affairs ACT	govt department	general submission
m10	Tara Ward, Executive Director, Animal Defenders Office	legal	S&G comment detailed
m11	Dr Joy Verrinder, Strategic Director, Animal Welfare League Qld	welfare	RIS questions
m12	Meg Parkinson, Director, Annie's Free Range	producer - egg	RIS Option
m13	Clive Wylie, Owner / Manager 'Banyard Game Birds'	producer - meat	general submission, quail only
m14	Carrie Jones, Hon. Sec. Bundaberg Poultry Fanciers Club Inc	exhibition	S&G comment, RIS option
m15	Candice Zulu	public	RIS option
m16	Carole de Fraga	public	S&G comment
m17	John Cordina, Cordina Chickens	producer - meat	RIS questions
m18	David Parrott, Cordina Chickens	producer - meat	RIS questions, similar to m17
m19	Denise Ankrett, Cordina Chickens	producer - meat	RIS questions, similar to m17
m20b	Dr Phil Glatz and Geof Runge, Poultry management consultants	consultant	general submission on beak trimming only
m20a	Dr Phil Glatz and Geof Runge, Poultry management consultants	consultant	S&G comment on beak trimming only
m21	Edgar's Mission	welfare	general submission
m22	Egg Farmers of Australia	Industry association/ peak body	RIS questions, detailed submission
m23	Gemma Merrick, Human Resources and OHS Coordinator, Golden Eggs	producer - egg	RIS option
m24	Ian Claxon, Livestock Manager, Golden Egg Farms	producer - egg	general submission
m25	John Coward, CEO, Queensland United Egg Producers	industry association/ peak body	entered manually, RIS Option
m26	Lisa Baker MLA (WA)	MP	general submission

m27	Bryan Reimers, Sales Manager, Loddon Valley Eggs	producer - egg	general submission
m28	RSPCA community submissions	welfare	
m29a	Heather Neil, CEO, RSPCA Australia	welfare	general submission/cover letter
m29b	RSPCA	welfare	S&G comments, RIS Option
m30	Ruchita Saklani	public	S&G comments, similar to m83
m31	Jonathan Attard, Managing Director, Solar Eggs P/L	producer - egg	RIS Option
m32	Nation Builder Petition List	public	
m33	John O'Hara, MD/CEO, Sunny Queen Australia	producer - egg	RIS questions, similar to m22
m34	Voiceless	welfare	S&G comments, general submission
m35	Hon Alannah MacTiernan MLC, Minister for Agriculture and Food WA (Department submission)	govt department	RIS questions plus detailed submission
m36	World Animal Protection [see m63 for updated submission after errors found in pdf].		
m37	Gary Millar, Chair AgriFutures Australia, Chicken Meat Advisory Panel	research	RIS options
m38	Australian Food Sovereignty Alliance	other	S&G comments, RIS options, detailed submission
m39a	Australian Veterinary Poultry Association	veterinary	S&G comments, RIS options, detailed submission
m39b	Australian Veterinary Poultry Association	veterinary	RIS questions, detailed submission
m40	Bert Sheridan [updated submission m4-2]		
m41	Bert Sheridan [updated submission m4-1]		
m42	Cheralyn Simpson	producer - egg	RIS questions
m43	The Commercial Egg Producers Association of Western Australia	Industry association/ peak body	RIS questions
m44	Janet Doust, Secretary, Exhibition Poultry Association of NSW Inc	exhibition	S&G comments, see other exhibition
m45	Fremantle Egg Company	producer - egg	RIS questions
m46	George Arzey, Poultry Veterinarian	veterinary	S&G comments, RIS options, detailed submission
m47	[see m130 - duplicate]		
m48	Tim Mellor, President, The Law Society of South Australia	legal	RIS comments, detailed submission
m49	Nichola Donovan, President, Lawyers for Animals Inc	legal	S&G comments, detailed submission

m50	Lindon McKenna	public	S&G comments, detailed submission, similar to m83
m51	Robert Antonio, MD/CEO, McLean Farms	producer - egg	S&G comments, RIS questions
m52a	[duplicate of m216]		
m52b	[duplicate of m214]		
m53	Jeff Ironside	producer - egg	RIS Option, general submission
m54	Paula Hough, Director of International Legal Affairs, PETA Australia	welfare	endorses submission by voiceless
m55	Lynne Bradshaw, President, RSPCA WA	welfare	endorses submission by RSPCA
m56a	Name withheld as requested	public	RIS questions
m56b	Name withheld as requested	public	S&G comments
m57	ND Goody, Partner Administration Officer, Smalls Trading Co	producer - eggs	general submission
m58	Franko Pirovic, Pirovic Family Farms	producer - egg	general submission
m59	Phil Vernon, Managing Director, Australian Ethical Investment Ltd	other	general submission, S&G comment single
m60	Cassie Rowe MLA (WA)	MP	general submission
m61	Richard Rayner, CEO, Specialised Breeders Australia	producer - egg	S&G comment few, RIS Option
m62	Tenterfield Poultry Club	exhibition	general submission, see other exhibition
m63	World Animal Protection [updated m36 after errors found in pdf]	welfare	RIS questions, S&G comments, detailed submission
m64	Vivien Kite, Australian Chicken Meat Federation	Industry association/ peak body	RIS questions, S&G comment, detailed submission
m65	Animals Australia	welfare	S&G comment, RIS questions, detailed submission
m66	Ingham's Group (Turkey Operations)	producer - meat	RIS questions, S&G comment, detailed submission, similar to m64
m67	Ingham's Group (Meat Chicken Operations)	producer - meat	RIS questions, S&G comment, detailed submission, similar to m64
m68	Jodie Redcliffe, acting President, Australian Chicken Grower Association	Industry association/ peak body	RIS questions, S&G comment, detailed submission, similar to m64
m69	Phil Westwood, Freeranger Eggs and Convenor, Freeranger Club	producer - egg	general submission
m70	Joel Kopanica, Turi Foods	producer - meat	RIS questions



m71	All Game Club of South Australia	exhibition	S&G comment, RIS option
m72	Animal Law Institute	legal	general submission
m73	Dr Melanie Latter, AVA Head of Policy and Advocacy (on behalf of the AVA)	veterinary	S&G comment, RIS options
m74	Michael Leahy, Managing Director Aviagen Australia and New Zealand P/L	other	RIS options
m75	Legion Trial P/L	producer - egg	general submission
m76	Terry Taylor, Central Queensland Poultry Club Inc	exhibition	S&G comment, RIS option
m77	Jessica Spencer, Livestock Manager, Days Eggs	producer - egg	general submission, RIS option
m78	Edward Vaughan	exhibition	S&G comment
m79	Eric Forte	public	S&G comment, detailed submission, similar to m83
m80	Dr Kevin Smith, President, Exhibition Stud Poultry Australia	exhibition	S&G comment, RIS Option
m81	Colin Quast, Vice President, Australasian Turkey Federation	Industry association/ peak body	RIS questions, S&G comment
m82	Dr Sheridan Alfirevish, National Technical and Animal Welfare Manager, Baiada Poultry P/L	producer - meat	RIS questions, S&G comments
m83	Benn Van Elburg	public	S&G comments, detailed submission, similar to several others
m84	Eric Rosolen, Casino Poultry Club Inc	exhibition	S&G comment, RIS option
m85	Chris Forte	public	S&G comment, detailed submission, similar to m83
m86a	Claire Dolling	public	RIS questions
m86b	Claire Dolling	public	S&G comment, detailed submission, similar to m83
m87	Claire Mummery	public	S&G comment, detailed submission, similar to m83
m88	Dion Andary, President, Commercial Egg Farmers of South Australia and Tasmania (CEFASAT)	Industry association/ peak body	RIS Option, general submission
m89a	Deanne Vines	public	general submission/cover letter, supports Animal Australia submission
m89b	Deanne Vines	public	S&G comments, detailed submission, similar to m83
m90	David Banfield, Science and Agriculture Teacher, Mount Lilydale Mercy College	public	general submission

m91	Erin Callow	exhibition	S&G comments, see other exhibition
m92	Hon. Rick Mazza MLC (WA)	MP	RIS option, RIS questions
m93	Georgie Dolphin, Program Manager - Animal Welfare, Humane Society International (Australia)	welfare	S&G comments
m94	Janice Haviland and Martin Derby	public	S&G comment, support RSPCA recommendations
m95	Belinda Wilson, President, Law Institute of Victoria	legal	S&G comment
m96	Vegan Australia	other	general submission
m97	Nuncio Cascio, Cassaccio Egg Farm	producer - egg	RIS Option, general submission, similar to several others
m98	Bill Williams, Poultry Veterinarian / National Operations Manager, Proten LTD	veterinary	RIS questions
m99	Gawler Districts Poultry Fanciers Assoc. Inc.	exhibition	S&G comments
m100	Lauren Hoiles	public	S&G comments
m101	Jo-Anne Bloomfield	public	general submission
m102	Giorgina Abraham	producer - egg	RIS Option, general submission, similar to m97
m103	Noel Kratzmann	producer - egg	S&G comments
m104	Natalie Morgan	public	RIS questions
m105	Peter Bell	public	RIS questions
m106	Dinny Laurence	public	general submission
m107	Shannon Loughnane	public	RIS questions
m108	South Australian Poultry Association	exhibition	S&G comment
m109	Desley Stockman, Stockman's Eggs	producer - egg	general submission
m110	Charles Davis	public	general submission
m111	John Simmonds, Gippsland Pigeon Federation Inc	pigeon	general submission, supports ANRPB
m112	David Walker, Secretary, Australian National Racing Pigeon Board Inc	pigeon	RIS Option, S&G comment
m113	Greg Parkinson, CEO/Secretary ADMA	Industry association/ peak body	S&G comment
m114	Graham Walker	public	S&G comment
m115	RSPCA SA	welfare	endorses RSPCA Australia
m116	Mike Ryan	exhibition	general submission
m117	Janice Kendall	public	general submission
m118	Elizabeth Boros, Barrister; Allan Bulman, Solicitor; Bruce Dyer, Solicitor; Deborah Hambleton, Solicitor; Raelene Harrison, Solicitor; Catrin Moller, Solicitor; Alan Shaw, Consultant	legal	detailed submission

m119	Peter Wallace, Business & Operations Manager, Tasmanian Racing Pigeon Federation	pigeon	support ANRPB
m120	Alan Parnham, Director Farming, Ingham's	producer - meat	RIS options, general submission supporting m64 et al
m121	Dr Rebecca Jennings	public	general submission
m122	Katherine Balding, Director Technical Services, Ingham's	producer - meat	RIS options, general submission supporting m64 et al
m123	Students from East Bentleigh Primary School	public	general submission (12 letters from children to stop caging hens)
m124	Australian Eggs	Industry association/ peak body	general submission
m125	Braidwood Central School	public	general submission (5 letters from children to stop caging hens)
m126	Bruce Notley-Smith MP (NSW)	MP	general submission
m127	Dennis Merchant	public	general submission
m128	Errol Hetherington	exhibition	general submission
m129	J. Barr	public	RIS options
m130	Jamie Parker MP (NSW)	MP	general submission
m131	Jessica Shaw MLA (WA)	MP	general submission
m132	Leghorn Club of Australia Inc	exhibition	S&G comments, RIS options, see other exhibition
m133	Lismore Poultry Club	exhibition	S&G comments, see other exhibition
m134	Olivia Hetherington	exhibition	general submission, see other exhibition
m135	Peel Ridge Stud Waterfowl, Michael Peel and Maria Creeks Enterprises Pty Ltd (poultry), Jason Benn and Suari Mason	producer - other	S&G comments
m136	David May, CEO, DA Hall & Co	producer - egg	RIS options
m137	South and Central Queensland All Game Club Inc	exhibition	general submission, see other exhibition
m138	Jill Weaver, Secretary, Tasmanian Rare Breeds Poultry Club	exhibition	S&G comment, see other exhibition
m139	[duplicate of m98]		
m140	The Modern Game Club of Qld Inc	exhibition	S&G comments
m141	Val Maslen	public	general submission, RIS Options
m142	Kevin De Witte, Chief Veterinary Officer, Northern Territory Government Department of Primary Industries and Resources	govt department	RIS option
m143	NSW Farmers	Industry association/ peak body	general submission, RIS options

m144	A Prof Peter Groves, Director, Poultry Research Foundation, University of Sydney	research	S&G comments
m145	Sue Forte	public	S&G comments, detailed submission, similar to m83
m146	Dr Mandy Paterson, Principal Scientist, RSPCA Queensland	welfare	general submission, support for RSPCA submission
m147	Sentient	welfare	S&G comment
m148	Somerville Egg Farm	producer - egg	general submission, RIS option, similar to m97
m149	Brendan Bell	producer - egg	general submission, RIS option
m150	Tom Beattie	public	general submission
m151	W.J. Patterson	exhibition	general submission, RIS option, see other exhibition
m152	[see m27 – duplicate]		
m153	David Michael MLA (WA)	MP	general submission, similar to m26
m154	Mark Dolling	public	S&G comments, detailed submission, similar to m83
m155	Dr Di Evans	veterinary	S&G comment, general submission
m156	Chake Keerqin	public	RIS questions
m157	Kerry Chaplin	public	RIS questions
m158	Peter Bell [cover letter for m105]	public	general submission
m159	Clairly Simpson	producer - egg	RIS questions
m160	Dr Liz Walker, CEO RSPCA Victoria	welfare	general submission, supports RSPCA Aust submission
m161	Jarrad Sanderson	public	RIS question
m162	Selma	public	general submission
m163	[duplicate of m6]		
m164	Trish Verran	producer - egg	general submission
m165	Steve Dubber, Far North Coast All Game Club Incorporated	exhibition	S&G comments, see other exhibition
m166	Cathy Newton, President, Feather Clubs Association of Queensland Inc	exhibition	S&G comments, see other exhibition
m167	Dr Mehreen Faruqi, MLC (NSW) Greens NSW	MP	general submission
m168	Greg Mills	consultant	general submission
m169	Karoda	producer - egg	S&G comment
m170	[moved to n48]		
m171	Kevin McLeod	producer - egg	general submission
m172	Marnie Nolton	public	S&G comments, detailed submission, similar to m83

m173	Marriana Chester	public	S&G comments, detailed submission, similar to m83
m174	Nola Simpson	public	RIS questions
m175	Elizabeth Ellis	legal	S&G comment, RIS comments
m176	Free Range Egg & Poultry Australia Ltd	other	S&G comment
m177	Julian Johnson	public	RIS questions
m178	Modern Game Promotional Society Inc	exhibition	S&G comment, see other exhibition
m179	[see m131 - duplicate]		
m180	Danny Jones, Managing Director, Pure Food Eggs P/L	producer - egg	RIS questions
m181	Nathan Watson, Game Fowl Club of WA inc	exhibition	S&G comment, see other exhibition
m182	Dr Leisha Hewitt, Livestock Welfare	welfare	S&G comment
m183	John Watson (Hon. Sec.) Tasmanian Poultry Fanciers Association	exhibition	S&G comment, see other exhibition
m184	Stephen Kavanagh, Secretary, Queensland Pit Game Fowl Club Inc	exhibition	S&G comment, see other exhibition
m185	Ruth Pollard	public	general submission
m186	Steven Kavanagh	exhibition	S&G comment, see other exhibition
m187	Tim Polley, President, Old English Game Fowl of Australia Inc	exhibition	S&G comment, see other exhibition
m188	Animal Justice Party	legal	S&G comment, detailed submission
m189	Susan Kay	public	general submission
m190	NSW Young Lawyers	legal	RIS questions, detailed submission
m191	Carol Drew, Animal Liberation ACT	welfare	S&G comment
m192	Bridget Ingram	public	S&G comments, detailed submission, similar to m83
m193	Paul D'Alberto	producer - egg	general submission, RIS option, similar to m97
m194	Jarrad Sanderson	public	S&G comments
m195	Kalbarri Eggs	producer - egg	general submission, RIS option, similar to m97
m196	A Prof Tamsyn Crowley	research	RIS questions
m197	Lea McCosker, CEO, PROOF	other	S&G
m198	Dr Richard Lauder	public	RIS options, general submission
m199	Rosina Nicolaisen, for the Nesci family	producer - egg	general submission, RIS option, similar to m97
m200	Sharon Koh	public	S&G comments
m201	Con Tamvakis	producer - egg	general submission
m202	Tasmanian Game Spectacular	exhibition	S&G comment, see other exhibition

m203	Professor Christine Parker (Melbourne Law School, The University of Melbourne), Dr Gyorgy Scrinis (Faculty of Veterinary and Agricultural Science, The University of Melbourne and Dr Rachel Carey (Faculty of Veterinary and Agricultural Science, The University of Melbourne)	other	detailed submission
m204	Victorian Farmers Federation	Industry association/peak body	detailed submission
m205	Associate Professor L Crowley- Cyr of The University of Southern Queensland and C Caple Senior Lawyer formerly of the Law Council of Australia	legal	detailed submission
m206	Darwalla	producer - meat	detailed submission, similar to m207, m212
m207	Golden Cockerel	producer - meat	detailed submission, similar to m206, m212
m208	SA Ingham’s Chicken Growers Group	producer - meat	S&G comments, general submission
m209	Tony Perkins, General Secretary, South Australian Homing Pigeon Association Inc	pigeon	S&G comments (support ANRPB)
m210	Henry Marciniac, Secretary, Victorian Homing Association	pigeon	support ANRPB
m211	Jim Davis, Secretary, Victorian Racing Pigeon Union	pigeon	support ANRPB
m212	Woodlands	producer - meat	detailed submission, similar to m206, m207
m213	Brendan Tolentino	producer - meat	RIS question, similar to m129
m214	Vincent Colla, Moorabool Valley Eggs P/L	producer - egg	general submission, RIS option, similar to m97
m215	Paul Pace, CEO, Pace Farms	producer - egg	general submission, RIS option, similar to m97
m216	Simon Colla, Moorabool Valley Eggs P/L [	producer - egg	general submission, RIS option, similar to m97
m217	Bernard Egan, General Manager, Golden Eggs	producer - egg	general submission
m218	Libreri Farm Eggs	producer - egg	general submission
m219	Guido Colla, Moorabool Valley Eggs	producer - egg	general submission

# Appendix 7- List of new insight submissions

n1	Mike Cahill	public	general submission
n2	Kerrie Mchugh	public	general submission, similar to n14, n46, n48
n3	Mike Fletcher	public	general submission
n4	Nicole Lenoir-Jourdan	public	general submission
n5	Tania Docking	public	general submission
n6	Theresa Lynch	public	general submission
n7	Mark Baitis	public	general submission
n8	Lyn Eccleston	public	general submission
n9	Stefan Jamal	public	general submission
n10	Mark Baitis (2)	public	general submission
n11	Meredith Hilly	public	general submission
n12	Marianne Metzner	public	general submission
n13	Merri Harris	public	general submission, S&G comment
n14	Peter Boodles	public	general submission, similar to n2, n46, n48
n15	Bridgette Scalisi	public	general submission, S&G comment
n16	Heather Dewar	public	general submission
n17	Beth and Cara Lang	public	general submission
n18	Christine Bennett	public	general submission
n19	Louise Webb	public	general submission, S&G comment
n20	Catherine Harris	public	general submission
n21	Paul Griffin	public	general submission
n22	Mick Donelly	public	general submission
n23	Dr Ben Warton	public	general submission
n24	Emma Sanders	industry	general submission
n25	Rita Felton	public	general submission
n26	Sue Lawler	public	general submission
n27	Hayley Johnston	public	RIS options
n28	Allen Horrell	public	general submission
n29	Lauren Common	public	general submission
n30	Lisel O'Dwyer	research	general submission
n31	Thomas Neate	public	general submission
n32	Gillian Hansen	public	general submission
n33	Simon Barnacoat	public	general submission, S&G comment
n34	Debbie Smith	public	general submission, RIS options
n35	Paul Buxton	public	general submission
n36	Rachel Smith	public	general submission
n37	Rob Fiddymment	public	general submission, S&G comment
n38	Melita Rees	public	general submission
n39	Glenda Ives	public	general submission, S&G comment

n40	Greg Poole	consultant	same as m5
n41	Elizabeth Jacob	public	general submission
n42	Earthonaut Franz Schnattler	public	general submission
n43	Jade Licari	public	general submission
n44	Portia Taing	public	general submission, S&G comment
n45	Adam Joseph	public	same as m7
n46	Nicole Smith	public	general submission, similar to n2, n14, n48
n47	Narelle Burke	public	RIS options
n48	Isla Moyse	public	general submission
n48	Hugh McGilvray, Owner/Director IGA Mt Morgan	public	general submission, similar to n2, n14, n46