



AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

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Re: Response to the Proposed Draft Australian Animal Welfare Standards and
Guidelines for Poultry

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Australian Food Sovereignty Alliance

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About the Australian Food Sovereignty Alliance (AFSA)

The Australian Food Sovereignty Alliance (AFSA) is a collaboration of organisations and individuals working together towards a food system in which people can create, manage, and choose their food supply and distribution system. AFSA is an independent organisation and is not aligned with any political party. We have more than 700 individual, organisational, business, and farm members.

In 2014 we established a producers' branch of AFSA, Fair Food Farmers United (FFFU) to provide a balanced voice to represent farmers and advocate for fair pricing for those selling to the domestic market, connect Australian farmers for farmer-to-farmer knowledge sharing, and to be a voice for farmer-friendly regulations and standards.

We are part of a robust global network of farmer-led organisations involved in food security and food sovereignty policy development and advocacy. We are members of the International Planning Committee for Food Sovereignty (IPC), Urgenci: the International Network for Community-Supported Agriculture, and La Via Campesina – the global movement of peasant farmers, and we have strong relationships with Slow Food International and its Australian chapters. We also provide support for the sole Australasian representative on the Civil Society Mechanism (CSM), which relates to the Committee on World Food Security (CFS)

We work extensively with primary food producers and consumers across every state and territory in Australia. Our committee has consisted of published academics and lecturers from the University of Melbourne, RMIT, Deakin University, University of Tasmania, University of Sydney, and QUT. We have also had representation from farmers from every state, and local advocates and campaigners such as Food Connect, Friends of the Earth, Regrarians, Fair Food Brisbane, and the Permaculture Network.

Our vision is to enable regenerative farming businesses to thrive.

Australians increasingly care about the way their food is produced throughout the entire value-chain, including social and environmental impacts. They seek out food that is grown locally and without damage to the environment. Food produced on small regenerative farms is increasingly in demand, and we believe that it is critical that government heeds changing community expectations and facilitates, supports and encourages the growth and viability of regenerative agriculture while protecting the environment and human and animal health.

We welcome the opportunity to make a submission to the *Proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry* (the 'Proposed Draft').



Background

Context to the Animal Welfare Standards and Guidelines

The welfare of livestock in Australia has been supported by a series of Model Codes of Practice for the past 20 years. As community values and expectations change, the relevance of these codes have been intermittently called into question, revised and developed.¹ There has been general agreement about the desirability of having national standards of livestock welfare that are consistently mandated and enforced in all states and territories.²

Animal welfare is now caught in a crossroads of conflicting modes of agricultural production; one road is defined by highly efficient, intensive production and the other by regenerating landscapes and rearing animals on pasture. Animal welfare is typically calculated based on several factors, including health, conditions of lighting, humidity, ventilation, feed, water quality, stocking density and stock management skills. These calculations in growing poultry are often balanced with, and sometimes outweighed by, the “growth efficiency”³ or growth rate, feed conversions for and egg production of birds.

In Australia, policy and legal provisions have been considered ineffective in acknowledging animal welfare as a mainstream concern.⁴ This was identified by the World Animal Protection in 2014. In their assessment of Australia, they presented that, following the general election in September 2013, national funding was withdrawn from animal welfare issues in an effort to reduce red tape, streamline government processes and make budget savings.⁵ \$1 million per annum towards implementing the progressive Australian Animal Welfare Strategy was cut and the Australian Animal Welfare Strategy Advisory Committee was dissolved by the Abbott Government. Under the Animal Welfare Strategy and Animal Health Australia (AHA) management, the existing Model Codes of Practice (MCOP) were to be re-written in a new format, to incorporate both the national welfare standards and industry guidelines for each species or enterprise. The Strategy intended to re-format each of the 22 existing MCOP into a document that combines Australian Welfare Standards and Guidelines for that species or enterprise.⁶ Before it was dispersed, the Committee advised the Minister of Agriculture on animal welfare issues of national significance and drove the implementation of the Animal Welfare Strategy.⁷ Its dispersal was seen as ‘unwise’ by former Chief Veterinary Dr Gardner Murray, who warned that it would harm the development and

¹ <http://www.agriculture.gov.au/animal/welfare/aaws>, Australian Government, Department of Water and Agricultural Resources, Australian Animal Welfare Strategy – AAWS.

² <http://www.agriculture.gov.au/animal/welfare/aaws>, Australian Government, Department of Water and Agricultural Resources, Australian Animal Welfare Strategy – AAWS.

³ Business Queensland. Starting a Meat Chicken Farm. Accessed at <<https://www.business.qld.gov.au/industries/farms-fishing-forestry/agriculture/livestock/poultry/poultry-farming-queensland/chicken-meat-production/starting-meat-chicken-farm>>.

⁴ World Animal Protection, 2014, *Animal Protection Index: Australia*.

⁵ World Animal Protection, 2014, *Animal Protection Index: Australia*.

⁶ <http://www.agriculture.gov.au/animal/welfare/aaws>, Australian Government, Department of Water and Agricultural Resources, Australian Animal Welfare Strategy – AAWS.

⁷ RSPCA, 2013, Australian Animal Welfare Advisory Committee Scrapped. <<https://www.rspca.org.au/media-centre/press-releases/2013/australian-animal-welfare-advisory-committee-scrapped>>.

implementation of policy in the future because of heightening public scrutiny towards animal welfare.⁸

Australia's current Animal Welfare Task Group (AWTG) has relieved some of the inefficiencies in the administration of animal welfare policy and law by taking on the development of new Model Codes as early as 2013. Unlike the dissolved Advisory Committee's broad representation, the AWTG is largely made up of members in government departments of agriculture and primary industry and in divisions relating to biosecurity and product integrity.⁹ Since 2013, the Task Group has had the responsibility of formulating harmonised and nationally consistent animal welfare standards. The responsibility to coordinate and continue to deliver the Animal Welfare Strategy was handed down to states and territories and finalised in 2014. The government stepping back from leading animal welfare issues at a federal level suggested to the World Animal Protection that there would be barriers to continuation and improvement of the Strategy. One such barrier is that animal welfare research is majorly controlled by livestock industry research and development corporations.¹⁰ Another is that investments in live exports dominate the production of domestic animals throughout Australia and therefore have impact on animal welfare regulations. The recommendation to implement a stand-alone statutory body to oversee the development of animal welfare policies and laws was supported by animal welfare groups; but at the time when the non-statutory advisory committee was dissolved, what was to be the 'Independent Office of Animal Welfare' emerged in the form of 'Inspector-General for Animal Welfare and Live Exports',^{11, 12}

Animal welfare concerns have increasingly risen among consumers, as shown by the responses to the new free-range egg information standard. Thousands of small-scale producers spoke out against that information standard in an effort to have the maximum stocking density reduced to align with international standards and CSIRO recommendations. To the disappointment of many contributors to that process, of which there were 10,000, the legal definition permits 10,000 hens per hectare in free-range systems.

Current Welfare Standards and Guidelines

The current domestic poultry code, *the Model Code of Practice for the Welfare of Animals – Domestic Poultry* 4th edition (2002) (the '**Code**'), is based on industry guidelines created in 1983, which permit animal husbandry practices from the 1950s. The Fourth Edition was prepared by the Poultry Standards and Guidelines Drafting Group. It operates with equivalent Model Codes of Practice at slaughtering establishments. These codes are not mandatory.¹³ The Code does not recognise 'positive

⁸ ABC Rural, 2013, Chair says scrapping welfare committee is 'unwise', <<http://www.abc.net.au/news/rural/2013-11-08/gardner-murray-welfare-committee-chairman/5079648>>.

⁹ AWTG Terms of Reference, <<http://www.agriculture.gov.au/SiteCollectionDocuments/about/foi/disclosure-log/FOI201415-09-Sheep-Welfare-Standards-Guidelines-Part2-project-documents.pdf>>.

¹⁰ Jed Goodfellow, Animal Welfare Regulation in Australia and the Need for an Independent Office of Animal Welfare, April 2012.

¹¹ Voiceless, Independent Office Animal Welfare', <<https://www.voiceless.org.au/content/independent-office-animal-welfare>>.

¹² RSPCA, RSPCA welcomes proposal for Australian Commission for Animal Welfare <<https://www.rspca.org.au/media-centre/news/2017/rspca-welcomes-proposal-australian-commission-animal-welfare>>

¹³ Most jurisdictions have adopted the Code into law in various forms or have incorporated their own standards to suit their jurisdiction. Depending on the state or territory, compliance with these standards can be mandatory or voluntary; can be relied upon as a defence to a charge of animal cruelty; and/or can be adduced as evidence in animal cruelty proceedings. The intention of the Code is for 'standards' to be adopted by legislation, thus making them compulsory.

states' of hens and does not define animal welfare by the absence of disease, hunger and thirst.¹⁴ The current poultry code has been criticised for allowing battery cages; routine maceration of male chicks; de-beaking of chicks; and induced moulting. It also fails to require producers to select their flocks based on genetic traits that promote higher welfare outcomes.

Proposed Standards and Options

The existing and exceedingly outdated Model Codes of Practice for the Welfare of Animals are currently under review. In 2013, state and territory governments agreed to commence a full review of the Code 'in recognition of significant advances in husbandry practices, technology, and in available science'. This review officially commenced in June 2015, managed by Animal Health Australia (AHA) and led by the NSW Department of Primary Industries (DPI). As part of those reforms, the Code is now consolidated into the Proposed Draft, along with the Model Codes for the Farming of Ostriches¹⁵ and Husbandry of Captive-Bred Emus Second Edition.¹⁶

The Proposed Draft was accompanied by a Regulatory Impact Statement (RIS) and supporting papers (short reviews of the scientific literature developed to explain the basis for making decisions about key welfare issues). Additional papers on the DPI website included the Farmed Bird Animal Welfare Science Review by Agriculture Victoria. It is unclear how much weight was placed on this Science Review in forming the decisions in the Proposed Draft.

The Proposed Draft intends to '*provide a basis for developing and implementing consistent legislation and enforcement across Australia, and provide guidance for all people responsible for poultry. They are based on current scientific knowledge, recommended industry practice and mainstream community expectations.*'¹⁷

The RIS identifies seven options. A preferred option will be selected after public consultation. It raises a number of questions to prompt comments on key issues, although answering these questions is optional when making a submission.

- **Option A:** Maintain the status quo (i.e. the base case, or the way things currently are).
- **Option B:** convert the proposed national standards into national voluntary guidelines (the minimum intervention option).
- **Option C:** adopt the proposed standards as currently drafted.
- Variations of Option C:
 - **Option D** – vary the proposed standards to phase out conventional cages for chicken layers over 10 or 20 years in favour of alternative systems 'typical' free range/barn/aviary or furnished cages (with nests, perches, additional space and room to scratch/forage).

¹⁴ RSPCA (2016) The welfare of layer hens in case and cage-free housing systems.

¹⁵ Primary Industries Report Series 84.

¹⁶ Primary Industries Report Series 90.

¹⁷ Page 6, *Proposed Draft Australian Animal Welfare Standards and Guidelines — Poultry Public Consultation Nov 2017*.

- **Option E** – vary the proposed standards to reduce maximum stocking densities in barns or sheds for non-cage layer hens to 9 birds per m² and meat chickens 30kg/m².
- **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.
- **Option G** – vary the proposed standards to ban castration, pinioning and devoicing, no hot blade beak trimming at hatcheries, no routine 2nd beak trim – unless exceptional circumstances (hot blade permitted in this circumstance).

Issues with the proposed standards

1. The Exclusion of Alternative Production Systems
2. 'Systemic collusion' and the failure to meet community expectations
3. Inadequacy of studies used
4. Housing poultry in cages
5. Provision of Litter and Dust baths
6. Provision of Nests, Perches and Levels
7. Furnished cages
8. Maximum Stocking Densities
9. Forced Moulting
10. Minimum Light Levels
11. Standards on Beak and Bill Trimming
12. Standards on Stunning, Slaughter and On-farm Killing
13. Exceptions
14. Language/Expressions
15. Regulatory Issues

As a result of these issues, concerned organisations and individuals across Australia are banding together to lobby for significant changes to the proposed Standards and Guidelines.

The issues raised are discussed in detail throughout this submission.

Executive Summary

The current review of the *Model Code of Practice for the Welfare of Animals – Domestic Poultry* offers the first opportunity in 15 years to improve the minimum welfare standards for domestic poultry in Australia. It provides the chance to modify Australian standards to reflect current animal welfare science and equivalent international developments.

The Proposed Draft is significantly more comprehensive than the previous welfare standards in the 4th Edition, as well as in other welfare codes for ostriches and emus, some of those standards dating back to mid-20th century management practices. We commend the collective and lateral efforts of the Animal Welfare Task Group (**AWTG**), the Stakeholder Advisory Group (**SAG**) and Animal Health

Australia (AHA), and welcome the opportunity to comment on the Draft during the 90 day public comment period.

It is necessary for Australia to lead a fundamental reshaping of animal welfare standards that meet international standards and community expectations, and that is based on scientific research and available data from Australian farms. Many farmers give ethical reasons for changing towards pastured poultry production methods because of the maximum animal welfare and provenance it offers if well managed.¹⁸

This submission aims to contribute on behalf of small-scale, pasture-based poultry producers so that best animal welfare standards can be achieved more readily and regulated appropriately.

In this submission, AFSA will primarily make comment relating to the standards and guidelines for domestic poultry due to scope of our representation of poultry farms extending to small producers of layers, broiler chickens and ducks. As principle, we support best animal welfare practices in the industry as a whole.

What the Proposed Draft means for Farmers

Farmers employing pasture-based practices will lose a once in a generation opportunity to be heard in the decision-making process relating to poultry welfare. Continued large-scale production of poultry will further dominate the market and drive small-scale farmers into 'niche markets'.

What the Proposed Draft means for Eaters

It will turn a blind eye to popular demand for higher standards of welfare and eaters will continue to have low access to sustainably produced meat and/or eggs that positively impacts quality. Consumer quality perception when purchasing poultry will be informed by perceived standards of welfare and environmental factors that do not in fact meet their expectations.

What the Proposed Draft means for Poultry

Domestically raised poultry in conventional systems will continue to suffer from worse physical and mental states than those in countries with advanced animal welfare standards such as all nations of the EU, various states of the US, New Zealand and Canada.

What AFSA Members want

We demand that the Agriculture Ministers of all states and territories, Premiers and Local MPs support best examples of animal welfare standards using data relating to pasture-based systems.

We urge that they back research into better solutions for livestock welfare to meet community expectations and public health interests.

¹⁸ Kathleen Hilimere, 2011, *The grass is greener: Farmers' experiences with pastured poultry*, Cambridge University Press, *Renewable Agriculture and Food Systems*.

We support the development of a more inclusive, science-based system for setting animal welfare standards where an independent body monitors the animal welfare standards and investigates regulatory behaviour.

List of Recommendations

Recommendation 1: Phase out battery systems in the next 3 - 5 years and 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)¹⁹, and supporting long-term management of cage-free systems as done across the EU.

Recommendation 2: Transition poultry systems to free range over 10 years and during that transition reduce the maximum stocking density in barns or sheds (as they are phased out) for non-cage layer hens to 2 birds per metre squared and meat chickens 15kg per square metre.
(Option E suggests reducing maximum stocking densities in barns or sheds for non-cage layer hens to 9 birds per m2 and meat chickens 30kg/m2)

Recommendation 3: Current practice of rearing poultry outdoors on pasture for egg and meat production be considered with the updated or new Regulatory Impact Statement and be added as a supporting paper to reflect the absent data on Australian poultry farms.

Recommendation 4: Establish an independent non-governmental body that oversees the development of animal welfare regulation and represents all relevant stakeholders including small-scale farm businesses.

Recommendation 5: Directly source data from Australian pasture-based farms and genuine free-range farms by visitation or by extended consultation in order to obtain correct information about the quality of alternative poultry production.

Recommendation 6: Explore research on alternative agricultural production occurring internationally in order to gain a more comprehensive understanding of the benefits of pasture-based poultry systems.

Recommendation 7: Australia primarily sign the Universal Declaration of Animal Welfare.

¹⁹ RSPCA (2016) The welfare of layer hens in case and cage-free housing systems. <https://www.rspca.org.au/sites/default/files/2016-08%20The%20welfare%20of%20layer%20hens%20in%20cage%20and%20cage-free%20housing%20systems-FINAL_0.pdf>.

Identified Issues with the Proposed Standards

The Exclusion of Alternative Production Systems

The Regulatory Impact Statement did not consider the costs and benefits of alternative production systems such as pasture-based poultry management systems. The supporting papers lacked inclusion of such systems in their scientific review.

The aim of this submission is not to disprove the science in the review, but to build the narrative for pasture-based systems. We seek the increased viability and representation of this emerging group of farmers.

Alternative production systems for poultry provide outdoor access, are cage-free and free range, and allow birds to perform natural behaviours, such as dust bathing and scratching, with ample space, shelter, fresh air, sunlight and protection from predators.

Pastured poultry refers to a poultry production system that is characterised by flocks of birds kept primarily on pasture. Pasture is defined as a tract of land that supports grass or other vegetation eaten by domestic grazing animals. The term ‘pastured poultry’ is associated with Joel Salatin, author of popular book, ‘Pastured Poultry Profits’ (2004). Salatin developed a system of pasture rotation that produces nutrient-rich grass and maximises the spreading and composting of animal waste. Floorless pens are moved (once or twice daily) around a green pasture.²⁰

PROOF is a certification program for pastured eggs, pork, chicken, beef and lamb from animals that have been raised on pasture in open fields²¹, provides a definition of pastured poultry:

‘All livestock are raised outdoors with continuous and unrestricted daytime access to paddocks that are suitable for grazing and are provided with shade and shelter. All animals must use the paddocks each day unless; they choose to shelter because of inclement weather, short term confinement for veterinary treatment or when giving birth. Feed supplements are available to ensure all their nutritional needs are met. Animals are kept at a stocking intensity that will ensure forage is always available in an actively managed rotational grazing system.’

There are two distinct free-range production types; intensive free range (high stocking rates, large flock sizes, static sheds) and pastured free range (low stocking rates, small flock sizes, mobile sheds). Some would describe pastured free-range systems as genuine free range. Farm certification programs are available that cater to pastured free range farms, all with similar standards for production, **PROOF** being one of them. These programs are based on stocking densities of **1,500 birds per hectare** in paddock rotations.

²⁰ EN Sossidou, A Dal Bosco, HA Elson, CMHA Fontes, Pasture-based systems for poultry production: implications and perspectives. World's Poultry Science Journal 2011, Vol.67(1), pp. 47-58.

²¹ About PROOF <https://www.proof.net.au/PROOF>

There are multiple types of mobile housing for alternative poultry systems, including, but not limited to:

1. Pastured poultry pens
2. “Net” range or “day range”
3. Chicken Tractors
4. “Eggmobiles”
5. Yarding

Pastured poultry are widely perceived as being beneficial and optimum for poultry welfare and should therefore comply with all Five Freedoms.

Five Freedoms

1. Freedom from Hunger and Thirst: by ready access to fresh water and a diet to maintain full health and vigor.
2. Freedom from Discomfort: by providing an appropriate environment including shelter and a comfortable resting area.
3. Freedom from Pain, Injury or Disease: by prevention or rapid diagnosis and treatment
4. Freedom to Express Normal Behavior: by providing sufficient space, proper facilities and company of the animal’s own kind.
5. Freedom from Fear and Distress: by ensuring conditions and treatment which avoid mental suffering.

Outdoor access provides birds with ample space, fresh air, direct sunlight, and allows them to express natural behaviours such as dust bathing, scratching, foraging, running, flying etc, and can also provide certain nutrients in the pasturage (Fanatico, 2008a, 2008b). The first Freedom, from hunger and thirst, is met by properly managing the basic poultry production standards mainly within the house. The Freedom from thermal and physical discomfort is challenging as pasture-based systems face more climatic extremes than intensive controlled environment ones. However, they may also provide more ‘control to the animal by offering a choice when seeking warmth or a cool place to rest (Spoolder, 2007). The Freedom from pain, injury and disease is the most difficult one to achieve, as pastured poultry are not always beak-trimmed although it is still important to prevent feather-pecking and cannibalism. Moreover, birds are more exposed to climatic extremes, wildlife and predation, more at risk of smothering, contracting infectious diseases and prone to endo- and exo-parasitic infestation. The Freedom to express normal behaviour can be met through environmental enrichment and group housing where birds are able to behave naturally. Under appropriate range conditions, birds can show high vigour, firm and strong feather coverage, as well as warm red combs and wattles (Bogdanov, 1997). Birds may show signs of calmness and comfort, such as dust and solar bathing (although sunburn is a risk and shade must be available), stretching wings, beak cleaning and preening. The Freedom from fear and distress is supported by extra (social) space. Stress can be reduced by access to range, small flocks and low stocking density. However, poultry can exhibit fear of open spaces, which is partly why only a minority venture out.²²

²² Pasture-based systems for poultry production: implications and perspectives
Sossidou, E.n ; Dal Bosco, A ; Elson, H.a ; Fontes, C.m.g.a

The case for alternative production systems

The Proposed Draft does not enable alternative production systems that promote best practice poultry welfare and public health, but instead permits the use of cage systems and other indoor non-cage operations. While these systems have, in the past, been seen as better environments to control infectious disease from migratory birds, evidence is increasingly showing that conventional, large-scale poultry operations can in fact cause outbreaks of disease. Factories provide an amenable environment for the evolution of a variety of virulent influenzas, including pandemic strains. For example, swine flu H1N1 appears by definition industrial in origin. Rob Wallace, a public health phylogeographer, wrote in his book *Big Farms Big Flu* that:

*'For the long term, we must end the poultry industry as we know it. Bird flu now emerges by way of globalised network of corporate poultry production and trade, where specific strains first evolve. We must devolve much of the production to smaller, locally-owned farms.[50] Genetic monocultures of domesticated birds must be diversified back into heirloom varieties, as immunological firebreaks. Migratory birds, which serve as a fount of influenza strains, must be weaned off agricultural land where they cross-infect poultry. [51] To do so, wetlands worldwide, wildfowl's natural habitat, must be restored. Global public health capacity must be rebuilt.[52] That capacity is only the most immediate remediation for the poverty, malnutrition, and other manifestations of structural violence that promote the emergence and mortality of infectious diseases, including influenza.[53]'*²³

Feedback of the research is showing that the very efforts pursued to control pathogenic bird flu may in passing increase viral diversification and persistence.²⁴ This epidemiological pollution threatens the very existence of the livestock industry, but mass commoditisation of poultry and concentration of production continues to be allowable under the proposed welfare standards.

In 2013, *The Conversation* reported that Australia was experiencing an egg shortage as a result of H7N2 cases in NSW. This deadly bird flu or virus, along with viruses of the H5 subtypes, can progress to be highly pathogenic in poultry through the process of mutation. The devastating H5N1 avian influenza strain has not ever been detected in Australian wild or domesticated birds, but all previous highly pathogenic avian influenza outbreaks in Australian poultry have been caused by H7 viruses. Australia has both the 2012 H7N7 and 2013 H7N2 strains, the more typical type A viruses; and these are circulating and do pose a risk at the farm level.²⁵

Pastured hens are susceptible to the same metabolic diseases as caged birds but their environment can also influence their disease status (Miao, Glatz, & Ru, 2005) therefore pasture management and

World's Poultry Science Journal, 2011, Vol.67(1), pp.47-58

²³ Rob Wallace, 2016, *Big Farms make Big Flu*, Monthly Review Press, New York. pg.58-65

²⁴ Rob Wallace, 2016, *Big Farms make Big Flu*, Monthly Review Press, New York. pg.58-65

²⁵ Frank Wong & Peter Daniels, 2013, Avian Influenza – why it's not going away, *The Conversation* December 5 2013.

paddock rotations are critical not just to reduce the incidence of disease but to also manage forage quality and nutrient loading in the soils (Gerzilov, Datkova, Mihaylova, & BozaKova, 2012).²⁶

A consulting farm animal welfare scientist for the Humane Society of the United States and an internationally renowned expert on farm animal welfare science found that:

*Disease risk in cage-free systems can be reduced by a variety of means. For free-range systems, in addition to these steps, disease risk can ... be reduced by utilising pasture rotation to regenerate soil, regularly mowing or grazing to keep short vegetation on pasture, using only land with good drainage, removing heavily contaminated soil around the house before introducing a new flock, and installing fencing and bird mesh to exclude wild birds and other animals.*²⁷

While studies show that caged hens have a lower risk of infectious disease than uncaged hens in indoor systems because they are positioned off the ground in wire cages and cannot interact with many other hens, hens in battery cages can suffer from 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.²⁸

Reiterating the words of Rob Wallace, “[w]e might instead consider devolving much of the production to regulated networks of locally-owned farms.” Governments are responsible for considering responses to humanity’s epidemiological risks. They must respond to the risks posed by agricultural infrastructure just as viruses and bacteria quickly evolve in response to human infrastructure.

Inadequacy of studies used

The Proposed Standards rely on scientific evidence concluding that bird health is a major concern in non-cage systems. These concerns revolve around mortality from cannibalism, the absence of foraging substrate contributing to feather pecking, and risks of exposure to wildlife pathogens and soil-borne pathogens increasing biosecurity risks.

The accompanying studies done by industry body Australian egg conclude that there is no difference in the stress levels of birds in battery cages, barns and free-range farms.

The supporting documents to the Proposed Draft inadequately inform the Draft animal welfare standards and guidelines for poultry. Although they intentionally “do not make specific recommendations on major issues”, the papers ought to address the issue of excluding a broader data on Australian farms that feature best practice examples of various production systems that promote welfare.

²⁶ PROOF

²⁷ <http://www.hsi.org/assets/pdfs/a-comparison-of-the-welfare-of-hens-in-battery-cages-and-alternative-systemshsi.pdf> Humane Society International

A Comparison of the Welfare of Hens in Battery Cages and Alternative Systems Sara Shields, Ph.D. and Ian J.H. Duncan, Ph.D.

²⁸ <https://www.rspca.org.au/blog/2017/facts-about-battery-cages>
RSPCA, The facts about battery cages, Monday, 1st May 2017.

The studies should more comprehensively include demand for farm animal welfare. Research of this kind was done in Michigan, the United States, in the form of a field experiment. It was found that consumers are willing to pay significant animal welfare premiums for select products; that animal welfare premiums are product specific and should not be generalised; it is important to consider producer costs when evaluation demand for animal welfare; and producers bear the costs of changes brought about by mandates.²⁹

Although it is recognised that little has been written on experiences with free-range systems³⁰, let alone rearing poultry outdoors on pasture for egg and meat production, the number of farmers starting up, integrating and transitioning to pasture-based systems is rising. The present science on free range systems in the literature shows limited information about this enterprise. Comparisons between different enterprises (cage, barn and free range most commonly) do not represent all forms of outdoor systems practiced in Australia. This may be due to the fact that alternative cage-free systems are more complex to manage and less likely to be researched due to their lack of visibility in the market. As shown by farmers' experiences, these alternatives can offer greater welfare conditions for domestic poultry. Alternative systems similar but variant to pasture-based systems can also offer an innovative alternative to current systems that are already an emergent practice. This merits critical analysis so that these methods can be refined in their implementation. Research could include the benefits and challenges of integrating pastured poultry into farming operations, using heritage breeds, and management practices. A research model used in previous studies in the US showed the merit in evaluating value laden farmer decision-making and surveying farmers' experiences of pasture-based management systems.³¹

The unique management systems of pastured poultry farming have been documented and described as a sustainable farming technique of raising animals in largely outdoor environments as well as a traditional method of farming as opposed to factory farms which favour maximum production levels.

Benefits of Pasture-based poultry methods

- It is often an inexpensive way to add supplemental revenue and diversification to small farms, especially for those with limited resources. In addition, the “niche market” targets growing consumer demand for a more natural, humanely raised and environmentally friendly product.
- Small flock production can include chickens, turkeys and other species, such as ducks, geese and quail. Diversification of animal species and the myriad ways those birds can be incorporated into on-farm production, such as organic and free-range, make for an attractive enterprise.
- Components of pastured poultry production, such as animal waste and housing facilities, are effective in value-added production and niche marketing.

²⁹ David L. Ortega, Demand for farm animal welfare and producer implications: Results from a field experiment in Michigan.

³⁰ Angela Bullanday Scott, Mini Singh, Jenny-Ann Toribio, Marta Herndandez-Jover, Belinda Barnes, Kathryn Glass, Barbara Moloney, Amanda, Peter Groves.

³¹ Renewable Agriculture and Food Systems.

https://www.researchgate.net/publication/236974606_The_grass_is_greener_Farmers_experiences_with_pastured_poultry

- By supplying eggs and meat to both the farmer and the consumer, improving the soil, controlling insects and weeds, and blending effectively into an integrated grazing system.
- Whether raised as a backyard flock, on small-to-medium-size farms, or in a larger pastured environment, grass-fed poultry can be a successful enterprise that supports sustainable production systems, positively impacts the environment and provides profitable marketing and value-added products.³²
- Poultry can remedy problem soil and control insect species and weeds while supplying a new revenue stream for a farm.³³
- Birds on pasture or cropland act as miniature manure spreaders that fertilise the soil and improve plant performance by providing a layer of rich organic matter.³⁴
- When egg production is integrated into a farming system, the nutrient addition to the soil can be used to advantage for crop or forage production.³⁵
- Pastured poultry is more labour intensive and therefore costlier to produce, but this is offset by the premium price the end-products bring.
- There is a distinct market advantage to pastured production and this is a high growth area that can be taken advantage of by those willing to produce eggs in a manner that meets the needs of the consumer and their perceptions of pastured production.
- Raising hens outdoors on pasture is about providing a choice to the consumer that seeks, in their mind, a more ethically produced egg. The challenge is to keep consumer trust in the term pastured so that it will translate into a better dollar return for the producer.³⁶

Further research could be done on these benefits to assist the process of phasing out cage productions systems. Hundreds of free-range and pasture-based poultry farms have been identified on the *Flavour Crusader* website. <http://flavourcrusader.com/blog/2011/09/free-range-eggs-australia/>

A random selection of these farms is listed below:

1. Allandale Pastured Free Range Eggs, Burnt Yards

Leisa and John's hens are free to roam where they please, and are housed in mobile sheds so they are on fresh pasture every day. The hens are protected from predators by Maremma dogs. The hens are stocked below 100 hens per hectare.

2. Carbeen Pastured Produce, Manildra

Rodger and Katherine's hens are housed in trailers; the chickens are moved daily, following in rotation behind their cattle and sheep. They're fed grain to complement their grass and bug diet.

3. Farmer Browns Pastured Eggs, Dunedoo

The Fergusson family's pastured hens live unrestricted in an 85-hectare paddock adjoining a

³² Sustainable Agriculture Research & Education, 2012

<https://www.sare.org/Learning-Center/SARE-Project-Products/Southern-SARE-Project-Products/Pastured-Poultry>

³³ SARE, Livestock Alternatives, Profitable Poultry: Raising Birds on Pasture.

³⁴ SARE, Livestock Alternatives, Profitable Poultry: Raising Birds on Pasture.

³⁵ PROOF

³⁶ PROOF

large area of protected woodland. The hens lay their eggs in mobile sheds by day and perch comfortably at night. Maremma dogs provide protection.

4. Hand to Ground, Baynton

Alex and Emily Sims' flocks live on real grass pasture—in the open air, with space to move, peck, dust bathe and forage. They are moved to fresh pasture weekly, via the egg mobile. They eat a rich diet of garden scraps, insects and bugs, and GMO-free wholegrain feed.

In the US, a research body called Sustainable Agricultural Research and Education (SARE) has been supporting pastured poultry production, health, marketing and value-added efforts through grant-funded projects and unbiased, practical educational resources. It has collected educational materials, including case studies of pastured farms and fact sheets, developed out of decades of SARE-funded pastured poultry research. This was borne out of the rapidly growing interest in pastured poultry production among small-scale farmers in recent decades. Australia ought to have similar and potentially more comprehensive data on such enterprises to have accurate information to assess in the process of reviewing significant regulations such as animal welfare codes.

SARE's research produces extensive fact sheets about raising birds on pasture and includes details about pastured poultry economics, housing systems, feed, breed, mortality and predation. This research serves as an educational tool that can be accessed by farmers willing to set up pastured poultry operations in America.

Recommendation: Directly source data from Australian pasture-based farms and genuine free-range farms by visitation or by extended consultation in order to obtain correct information about the quality of alternative poultry production.

Recommendation: Explore research on alternative agricultural production occurring internationally in order gain a more comprehensive understanding of the benefits of pasture-based poultry systems.

'Systemic collusion' and failure to meet community expectations

AFSA members were deeply disappointed to discover that the NSW DPI were found to have manipulated the development of new welfare standards for the egg industry. Egg farmers were [accused of engaging in 'systemic collusion'](#) with the DPI to thwart moves to outlaw battery hens.

NSW is the largest producer of caged eggs in the country and claims it has a vested interest in continuing the use of battery hens. In 2016, NSW egg farmers³⁷ underwent scrutiny in the Federal Court case where two companies, Derodi and Holland Farms, which trade together as Free-Range Egg Farms (FREF), were penalised \$300,000 for making false and misleading claims about their eggs

³⁷ The case focused on two NSW farms - Hutchison Farm in Booral and Sepos Farm in Allworth - which together supply a third of FREF's "free range" eggs. <http://www.watoday.com.au/business/consumer-affairs/free-range-egg-farms-fined-300000-for-misleading-shoppers-with-false-claims-20160415-go70cu.html>

sold throughout Australia as Ecoeggs, Port Stephens and Field Fresh.³⁸ The ACCC is addressing increasing consumer concerns about egg labelling³⁹, but for the Commission the issue surrounds consumer transparency and not animal welfare.⁴⁰

Further, and related to the actions of the WA and Victorian Agriculture Departments⁴¹, the Proposed Draft was manipulated early on by the NSW DPI and the egg industry. Egg farmers were also accused of engaging in ‘systemic collusion’ with the NSW Government to thwart moves to outlaw battery hens.⁴²

In early 2017, the integrity of the process for developing Australia's new poultry standards was in question. The Victorian and WA governments were unsatisfied with the way in which the NSW Department ran the review before the standards were released for public comment.

The WA Government said it supported the creation of an independent statutory body to oversee drafting and enforcement of animal welfare standards. Such a body has previously been recommended by the Productivity Commission but has not been set up. The WA Government has indicated it may go it alone and develop State-specific standards if the new national standards do not reflect modern practices and public sentiment.

In its attempt to fulfil mainstream community expectations much has been left amiss. Many consumers and producers are concerned that animal welfare laws continue to privilege intensive animal production and exports.

These non-transparent and non-democratic actions of the NSW DPI in this process has enabled Australia to become at risk of defining itself as a ‘low animal welfare haven’.⁴³ It would also seem that the Government is failing to meet community expectations and therefore the base intention of the Proposed Draft itself.⁴⁴

Recommendation: Establish an independent non-governmental body that oversees the development of animal welfare regulation and represents all relevant stakeholders including small-scale farm businesses.

Housing poultry in cages

There have been opportunities in the past for Australia, as one of the world's top consumer of chicken in the world (behind Brazil), to avoid becoming a ‘low animal welfare haven’.

³⁸ Ester Han, WA Today, Free Range Egg Farms Fined \$300,000 for misleading shoppers with false claims, 15 April 2016, accessed at: <http://www.watoday.com.au/business/consumer-affairs/free-range-egg-farms-fined-300000-for-misleading-shoppers-with-false-claims-20160415-go70cu.html>

³⁹ https://www.accc.gov.au/system/files/1029_Free%20range%20Eggs%20guidelines_FA.pdf

⁴⁰ Legal Vision, In a Scramble over Free Range Egg Claims? Misleading Advertising Update, 29 April 2016, accessed at: <https://legalvision.com.au/28432/>

⁴¹ ABC, Western Australia may leave Chicken Welfare Review, 22 December 2017, accessed at: <http://www.abc.net.au/news/2017-12-22/western-australia-may-leave-chicken-welfare-review/9283274>

⁴² ABC News, James Thomas and Alison Branley, 7:30 Report ‘Egg Farmers accused of colluding with Government department to sabotage moves to outlaw battery hens’ 21 December 2017.

⁴³ Harald Grethe, High animal welfare standards in the EU and international trade – How to prevent potential ‘low animal welfare havens’?

⁴⁴ Page 6, *Proposed Draft Australian Animal Welfare Standards and Guidelines — Poultry Public Consultation Nov 2017*.

*In 1990, the Australian Senate recommended the prohibition of battery cages once viable alternatives were developed, based in part on the large amount of scientific literature on the welfare of laying hens, dating back to the mid-1960s. When the Australian Model Code of Practice for the Welfare of Animals – Domestic Poultry was last reviewed in 2000, there was an even greater body of scientific evidence available on the welfare of layer hens, and cage-free production systems were already well-established in Australia.*⁴⁵

However, in 2017 the Proposed Draft released that it would permit battery cages in a number of standards and guidelines, including but not limited to the following:

- a. SA4.4, SA4.5, GA410; and
- b. SB1.2 (reference to “multi-deck cages”), SB1.3, SB1.4(3)+(5) (reference to “all levels”)

In an attempt to regulate the use of cages, the proposal has effectively continued the sanctioning of battery cage systems.

One industry [supporting paper](#) to the standards argues that extra cage space does not guarantee better welfare for hens. It claims that battery cages allow better inspection and more efficient management of the birds, the biosecurity risks and the environmental impact.

However, there is no evidence cage-free hens are more prone to feather pecking than caged hens. What cages achieve is locking hens in small cages with limits to contact with other hens.⁴⁶

Further, there are many options to protect hens in pasture-based poultry management:

- Maremma dogs
- Electric netting around the house at night only
- Portable mesh or netting verandah for night time use
- Foxlights⁴⁷

Australian public opinion of cage systems has majorly influenced the industry and has driven an increase in the use of cage-free systems. Battery cages have been condemned by the majority of the community and have been banned in many countries. *A recent consumer survey found that 86.5% of West Australians think battery cages should not exist and 80% say battery cages have an impact on their purchasing or eating eggs. Major supermarkets and food service companies are contributing to the trend. Some of our best-known takeaway and convenience food brands are going cage free too, like Grill'd, McDonald's, Hungry Jacks and Subway.*⁴⁸

⁴⁵ RSPCA (2016) The welfare of layer hens in case and cage-free housing systems. <https://www.rspca.org.au/sites/default/files/2016-08/The%20welfare%20of%20layer%20hens%20in%20cage%20and%20cage-free%20housing%20systems-FINAL_0.pdf>.

⁴⁶ <https://www.rspca.org.au/blog/2017/facts-about-battery-cages>
RSPCA, The facts about battery cages, Monday, 1st May 2017.

⁴⁷ <https://www.proof.net.au/Indoor-Space-Requirements-Layer-Hens> PROOF, Space requirements for free range hens

⁴⁸ <https://thewest.com.au/opinion/egg-industry-must-prioritise-animal-welfare-rspca-ng-b88713076z>

Egg industry must prioritise animal welfare: RSPCA

Lynne Bradshaw, The West Australian, Monday, 15 January 2018

Demand for cage-free eggs is being recognised by some of the largest retailers such as McDonald's.⁴⁹ Woolworths and Aldi have committed to phasing out caged eggs by 2025.⁵⁰ The proportion of caged eggs sold in supermarkets has fallen from 75% to 49% over the past decade.⁵¹

The influence of ethical factors on acceptability of animal products can clearly be verified in the case of eggs. It is clear that ethical views have influenced consumer preferences in Australia and this has resulted in legislative changes. Many Australians enjoy eating meat, but there is low tolerance to animal mistreatment (Chen, 2016).⁵² Studies about attitudes and beliefs of Australians towards the wellbeing of animals indicated that most of them support that:

- 'farm animals deserve the same legal protections as companion animals'.
- 'animals deserve some protection from harm and exploitation, but it is still appropriate to use them for the benefit of humans'.
- 'it is quite acceptable to eat meat so long as animals are reared and killed humanely'.
- 'modern methods of "factory farming" in the production of eggs, milk and meat are cruel'.

Major retailers have third-party standards or have developed their own standards of welfare and many major stakeholders are now committed to responsible sourcing including animal welfare standards certified by RSPCA and PROOF. Livestock industries have been active in addressing the increased interest in animal welfare. Industry have adjusted their production practices responding to campaigns and preferences.

Lynne Bradshaw of the RSPCA said that the continued overall demand for eggs means that many cage eggs feed into the food services industry and processed food. This requires a legislative phase out of battery cages and a shift away from industry self-regulation.⁵³

*Australia is way behind most of the developed world in layer hen welfare. By the early 2000's, many other countries had recognised the inherent welfare problems with battery cages and prohibited or phased out their use. In Switzerland, cage systems for layer hens were stopped in 1992 and in 1989, Swedish egg farmers were given ten years to phase out battery cages.*⁵⁴

As a result of pressure not only from the public, but also from producers, retailers, consumers and the media, the 28 members of the European Union announced a ban on battery cages in 1999 and witnessed the completion of that ban in 2012, 20 years after Switzerland became first to phase out

⁴⁹ Andrea Hogan, McDonald's meets cage-free egg market, 24 January 2018.

⁵⁰ Alison Branley & James Thomas, Cafes are the new battleground for free range egg advocates, ABC, 22 December 2017.

⁵¹ <https://theconversation.com/proposed-poultry-standards-leave-australia-trailing-behind-other-industrialised-countries-88302>

Clive Phillips, December 1 2017 Professor of Animal Welfare, Centre for Animal Welfare and Ethics, The University of Queensland Proposed poultry standards leave Australia trailing behind other industrialised countries

⁵² L. Emilio Morales, Garry Griffith, Euan Fleming and Stuart Mounter, Animal Welfare and Livestock Production in Australia, 29th September, 2017 https://www.adelaide.edu.au/global-food/study/workshops/sustainable-value-chains/Emilio_Morales_-_Animal_Welfare.pdf

⁵³ <https://thewest.com.au/opinion/egg-industry-must-prioritise-animal-welfare-rspca-ng-b88713076z>
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⁵⁴ <https://thewest.com.au/opinion/egg-industry-must-prioritise-animal-welfare-rspca-ng-b88713076z>
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battery cages.⁵⁵ To join them in phasing out battery cage egg production are Canada, New Zealand and the states of California, Michigan and Ohio in the US where non-battery cage products are a requirement in many retail outlets.

*New Zealand will phase out battery cages by 2022. In Australia, only the ACT has passed a law that prohibits the use of battery cages.*⁵⁶

Stakeholders expected the Draft to follow international moves to ban the battery cage. But in the face of this global trend, Australia has shied away from a once-in-a-generation chance to secure better welfare for poultry since the last review in 2001.

Professor of Animal Welfare at the University of Queensland Centre for Animal Welfare and Ethics, Clive Phillips, was disappointed to see Australia 'trail behind the world' and that the draft standards conclude birds in battery cages have an "acceptable level of welfare".⁵⁷

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.

Local support for a better welfare for poultry using Consumer Law has led to a bill being introduced to the Federal Parliament by Minister Rebekha Sharkie of the Nick Xenophon team. The *Competition and Consumer Amendment (Free Range Eggs) Bill 2018* seeks to:

- Ensure eggs marketed as 'free range' are eggs laid by hens that are able to, and do in fact, move freely on an open range during daylight hours on most days.
- Ensure eggs marketed as 'free range' are laid from hens subject to a stocking density of no more than 1,500 hens per hectare, and that the stocking density information is displayed on egg labels prominently in a 'hens per hectare' format.
- Enable eggs that are not cage eggs but do not meet the definition of free range to be marketed as 'access to range'.⁵⁸

The RSPCA has recommended 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.

⁵⁵ December 1 2017, Clive Phillips, The University of Queensland, Proposed poultry standards leave Australia trailing behind other industrialised countries <https://theconversation.com/proposed-poultry-standards-leave-australia-trailing-behind-other-industrialised-countries-88302>

⁵⁶ <https://thewest.com.au/opinion/egg-industry-must-prioritise-animal-welfare-rspca-ng-b88713076z>
Egg industry must prioritise animal welfare: RSPCA

Lynne Bradshaw, The West Australian, Monday, 15 January 2018

⁵⁷ December 1 2017, Clive Phillips, The University of Queensland, Proposed poultry standards leave Australia trailing behind other industrialised countries <https://theconversation.com/proposed-poultry-standards-leave-australia-trailing-behind-other-industrialised-countries-88302>

⁵⁸ http://www.rebekhasharkie.com.au/free_range_not_fake_range

Recommendation: 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)⁵⁹, and supporting long-term management of cage-free systems as done across the EU.

Provision of Litter and Dust baths

Providing litter and dust baths can reduce stress and improve birds' immune systems significantly when accompanied with good management, adequate spacing, proper temperature, ventilation, good nutrition and clean water.

Deep litter systems increase the risk of enteric disease because it encourages heightened contact with droppings for all birds on litter. This is exacerbated by high stocking density and wet and cool conditions. In barn systems, litters, leaking drinkers and inadequate ventilation systems may all increase disease risks.⁶⁰

Litter is a cause of odour issues from broiler farms. Odour nuisance is a risk and cause of concern to communities surrounding large-scale operations. It is likely that the expansion of Australia's capacity to produce domestic poultry products will create impacts on nearby residences and communities. Techniques to mitigate odour is costly and impractical due to the high rate of ventilation required, particularly for broiler farms. Research suggests that odorants "may well be correlated with overall odour intensity and offensiveness" of broiler farms. In an attempt to mitigate odour, litter treatments, biofilters, neutralising agents, air scrubbers, ozone treatment, windbreak walls are used as techniques. However, these are known to be costly and impractical. (Dunlop and Gallagher, [2011](#)).

The RSPCA requires 'dry and friable litter condition' in broiler farms as part of their standards. This may partly address odour issues as lower litter moisture has been shown to reduce the emissions of odorants such as methyl mercaptan, H₂S, dimethyl sulphide, ammonia (NH₃), trimethyl amine, phenol, indole, and 3-methyl-indole (Sharma *et al.*, [2016a](#)). However, drying litter by increasing the ventilation rate is a costly process. Feed and gastrointestinal problems can exacerbate water excretion and contribute to wet litter condition.

Microbial decomposition in litter occurs under both aerobic (dry) and anaerobic (wet and caked) conditions (Jiang and Sands, [2000](#)).

*In the Proposed Draft, there is no standard requiring that poultry be provided with litter for the purpose of dustbathing and foraging.*⁶¹

⁵⁹ RSPCA (2016) The welfare of layer hens in case and cage-free housing systems. <https://www.rspca.org.au/sites/default/files/2016-08%20The%20welfare%20of%20layer%20hens%20in%20cage%20and%20cage-free%20housing%20systems-FINAL_0.pdf>.

⁶⁰ <http://www.hsi.org/assets/pdfs/a-comparison-of-the-welfare-of-hens-in-battery-cages-and-alternative-systemshsi.pdf> Humane Society International

A Comparison of the Welfare of Hens in Battery Cages and Alternative Systems Sara Shields, Ph.D.,* and Ian J.H. Duncan, Ph.D.

⁶¹ RSPCA

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.

Provision of Nests Perches and Levels

Perches

The Proposed Draft does not require perches as a legally required standard. Guidelines such as GA4.11 recommend that perches be provided. However, these are not standards, and will therefore not be enforceable.

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 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.

Nests

The Proposed Draft contains guidelines recommending sufficient nests for hens, but these will not be enforceable.⁶²

We support the RSPCA’s recommendation 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. We 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.

Furnished Cages

One alternative provided is furnished or ‘colony’ cages, which are larger and provide perches, nests and litter for pecking and scratching. But the research on furnished cages was provided by an industry body and only done on 12 flocks, which calls into question the comprehensiveness of the studies that accompany the proposed standards. With supermarkets in New Zealand banning all cage systems by 2025, furnished cages are not likely a sustainable or economically-sound alternative for egg production.

We do not support the use of any indoor poultry management systems and recommend a phase out of these systems in the next 10 years.

⁶² RSPCA



Figure 3.5: Furnished cage for small group (8 hens)

Various behaviours in a furnished cage with 8 birds. One birds is in the litterbox, one bird is wingflapping and several birds are perching

Image from: <http://www.laywel.eu/web/xmlappservletfc2c.html?action=ProcessSelection>

Figure 3.2: Schematic drawing of 2 large furnished cages

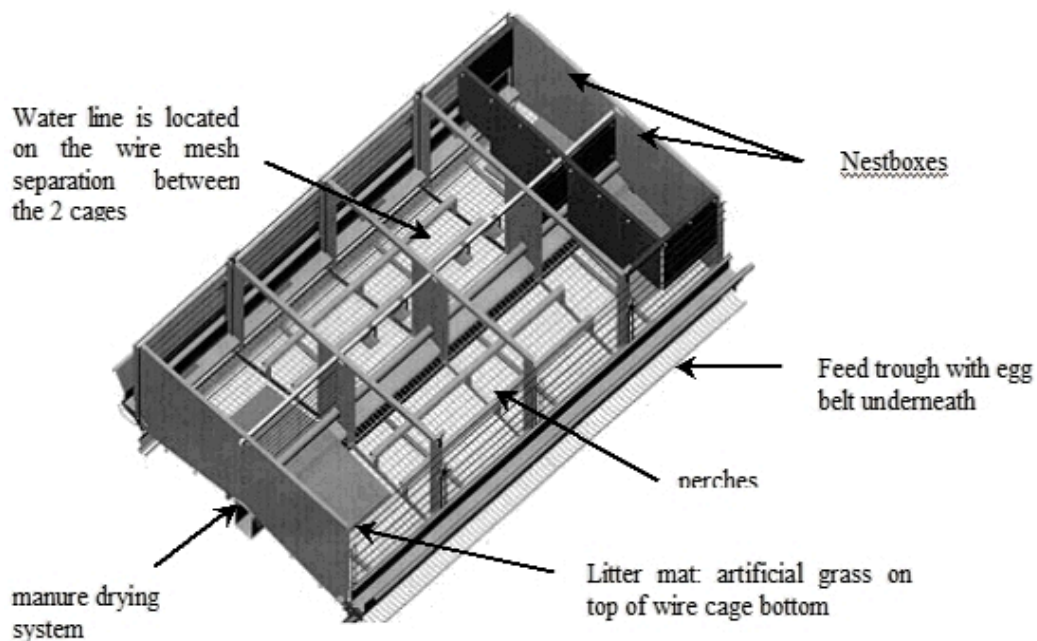


Image from: <http://www.laywel.eu/web/xmlappservletfc2c.html?action=ProcessSelection>

Maximum Stocking Densities

The PROOF Standards for Poultry require an indoor stocking rate of 16kg of bird weight per square metre, or, approximately 8 hens per square metre. This is a lower density than the maximum allowed in the Model Code of 30 kg of bird weight because mobile outdoor sheds are generally not fitted with cooling systems, ventilation systems or fans and therefore allowances must be made to ensure that temperature, humidity, air exchange and removal of gases is optimal for the welfare of the hens. Small sheds and caravans can heat up quickly, but housing with enough floor space to allow air

movement around each bird will lower its temperature and the humidity in this environment. Each system should be assessed on its own merits as mobile housing vary greatly between farms. Compliance should be much less complicated when birds are not confined indoors.⁶³

Lower stocking densities can have a positive effect as lay rates have been shown to be depressed by 5 to 7% when birds are stocked at higher rates i.e. 15 birds/m² compared with 7.5 birds/m² (Miao, Glatz, & Ru, 2005).⁶⁴

The Farmed Bird Animal Welfare Science Review by the Victorian Government found that a high stocking density was considered to be 15 birds per square metre.

Recommendation: Reduce the maximum stocking density in barns or sheds (as they are phased out) for non-cage layer hens to 2 birds per m² meat chickens to 15kg per square metre. (Option E suggests reducing maximum stocking densities in barns or sheds for non-cage layer hens to 9 birds per m² and meat chickens 30kg/m²)

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 normal behaviours.

Standards on Beak and Bill Trimming

The Supporting Paper to the Proposed Draft on Beak Trimming recommended that birds may experience acute pain during the procedures of beak trimming due to the presence of pain receptors in the tip of the beak. Chronic pain from neuroma formation has also been detected. Infrared beak trimming (IRBT) was found to have no chronic adverse consequence and that it was recommended IRBT be done by highly trained operators only when the bird is less than a day old.

Several references to beak trimming and de-beaking in the Proposed Draft were identified in GA3.17, SA9.14, and SA9.15.

The RIS provides for an option (G) to ban such treatment unless in exceptional circumstances. However, the Proposed Draft still permits the use of hot blading which is considered by many in the industry as the last resort in managing fowl behaviour.⁶⁵ Infrared is seen as a better treatment.⁶⁶

A growing focus worldwide on reducing the use of beak trimming shows that this invasive procedure may well phase out (Van Horne & Achterbosch, 2011). The reasons for beak trimming such as feather pecking can be reduced by avoiding overcrowding, stress, disease and diet impact on the birds' ability to carry out normal foraging behaviour. *Lower stocking rates, vaccination programs, lighting*

⁶³ <https://www.proof.net.au/Indoor-Space-Requirements-Layer-Hens> PROOF, Space requirements for free range hens

⁶⁴ PROOF, <https://www.proof.net.au/egg-farming>

⁶⁵ <https://www.australianeggs.org.au/for-farmers/tools-and-training/>

⁶⁶ <https://www.australianeggs.org.au/for-farmers/tools-and-training/>

programs and adequate nutrition can overcome these issues (Tauson, 2005). Lay Jr, et al. (2011) also suggest that feather pecking can become redirected foraging behaviour when factors such as diet, stress, disease and overcrowding reduce the opportunity for normal foraging behaviour. Pastured systems provide the opportunity to express these natural behaviours. Encouraging better use of range areas will help reduce severe feather pecking (Lambton, Knowles, Yorke, & Nicol, 2010).⁶⁷

The availability of alternatives to beak-trimming and the international examples of phasing out this method make Option G practical to implement.

Case study: The ban on beak-trimming in Austria

Beak trimming was banned in Austria by certification bodies by the ban was not executed because of competing interests between certification bodies and farmers. A mediation process was set up to resolve the problem which led to an agreement where beak trimming would be phased out with an agreed timetable of reduction. Steps were to be put in place to deal with the problem of feather pecking and cannibalism and to give farmers and rearers the confidence to manage hens without beak trimming.

The farmers agreed that:

- Those who continued to beak trim in the first years after the agreement was signed would pay an additional certification fee which increased annually.
- This created a fund which provided an insurance scheme which compensated any farmer who lost birds to cannibalism as a result of keeping birds with intact beaks.

A project was set up and funded by the Austrian Ministry of Agriculture, Forestry, Environment and Water Management which established guidelines for farmers and conducted a literature search to collect all information available concerning feather pecking and its causes the agreement phasing beak-trimming out was signed in June 2000. He adds that since 2005, there has been very little beak trimming in alternative husbandry in Austria. It dropped from a peak of just over 45% in 2001 to under 5% by 2005. It is currently just over 1%. The process of phasing beak trimming out took four and a half years from the signing of the agreement.

Levels of beak trimming started to drop after 2001 as the agreement took effect. This was followed by a small increase in both feather pecking and the more serious injurious pecking. However, as the project to address these problems advanced, levels of both dropped at the same time as beak trimming continued to be phased out.

Injurious pecking and feather pecking are multi-factorial in their origin.

An integrated approach is required including:

- Suitable breeds
- Appropriate stocking densities in both rearing and laying houses
- Provision of raised perches

⁶⁷ PROOF, <https://www.proof.net.au/egg-farming>

- Rearing systems with a similar layout to laying houses
- High protein diets, especially in the early stages of lay
- Control of weight gain, especially in rear
- A proper health plan including vaccination
- Good climate management, especially levels of pollutants such as ammonia
- Development of good human-animal relationships
- High levels of stockmanship and management including record keeping.

It is important that hens are bred for docility and against the tendencies towards feather pecking and cannibalism. In Austria, the breed Lohmann's Brown dominates the market, both in intensive and in alternative systems. A minority of alternative systems use the Lohmann's Tradition breed. Other breeds are rarely used in Austria, despite the attempts of their salesmen.

While Austrian systems are not free of feather pecking, levels of the more serious injurious pecking including cannibalism have been reduced at the same time as levels of beak trimming. In Austria, it is seldom for flocks to have levels of injurious pecking that increase mortality. Most importantly, the steps required to manage flocks without beak-trimming actually managed to reduce feather pecking and cannibalism at the same time, creating a win-win situation which was also good for production.

The avoidance of feather pecking and injurious pecking in birds with intact beaks is a key measure of good welfare in laying hens. Provided that injurious pecking can be controlled, the phasing out of beak-trimming is good for both production and welfare.

It is apparent that the proposed standards for beak and bill trimming of poultry do not acknowledge the pain associated with this procedure.⁶⁸

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.

[Standards on Stunning, Slaughter and On-farm Killing](#)

It is unclear whether on-ground consultation and research took place for slaughterhouses. The following methods are permitted in the Proposed Draft:

- a. Maceration permitted under guidelines – Part A, 10, GA10.2.
- b. Using gas (carbon dioxide or a mixture of inert gas) is accepted under the list of acceptable methods as a guideline only – Part A, 10, GA10.2.

Maceration of male chicks

Maceration is considered a humane method for killing male chicks. The RSPCA has stated that 'quick maceration ensures the chick is killed within a second and, if carried out effectively and competently,

⁶⁸ RSPCA

this method may be considered more humane than gassing with high concentrations of carbon dioxide. Gassing results in gasping and head shaking and, depending on the mixture of gases used, it may take up to two minutes for the chick to die.'

We urge the egg industry to invest in alternatives that avoid the potential for pain and suffering with current killing methods of male chicks. The RSPCA has urged the Government to invest in and progress research and alternatives to allow chick sex to be determined in the early egg incubation phase.

Gas kills

The World Animal Protection (WAP)'s suggestions for improving animal welfare standards at the slaughterhouse include:

- Use of humane handling techniques;
- Pre-slaughter stunning, which stops animals feeling pain;
- Correct use of stunning and restraining equipment;
- Handling pigs in groups to reduce stress on individual animals;
- Installation of blue lamps to calm poultry;
- Use of non-slip floors and low-angle ramps to stop animals falling and getting injured;
- Do humane slaughter training for slaughterhouses;
- Help companies introduce policies and guidelines on humane slaughter;
- Call for legislation and codes of practice on humane slaughter; and
- Work with vet schools to introduce teaching on humane slaughter.⁶⁹

The WAP referred to a five-year study of humane slaughter training that found that abattoirs earned a better reputation by using humane methods, helping them compete globally. *Staff morale improved too. And because fewer animals were injured, fewer carcasses were bruised – improving meat quality. In one slaughter plant in Brazil, 63% fewer animals were bruised following our training.*⁷⁰

Some issues in slaughterhouses/plants

1. The value of slaughterhouse workers and training is not measured; and
2. Society does not currently support its main production means but rather slaughterhouses are "brutalised", which makes supply chain not worth the while (Studies have been done on the "dehumanisation of slaughterhouse facilities" and the brutalisation of people working in this field.)

These issues should be addressed so to improve the capacity and training of operators in slaughterhouses.

⁶⁹ <https://www.worldanimalprotection.org.au/our-work/animals-farming-supporting-70-billion-animals/humane-slaughter-how-we-reduce-animal>

World Animal Protection Limited (formerly WSPA Australia Limited)

'Humane slaughter: how we reduce animal suffering' (2014)

⁷⁰ World Animal Protection

Temple Grandin completed research on the subject of stunning at slaughter plants. In her research she suggests that numerical scoring helped to greatly improve conditions of animal welfare. Animals can be assessed for body condition, lameness, swollen joints, coat/feather cleanliness, neglected injuries, and ease of handling.⁷¹

Appropriate training and protection for workers within slaughterhouses are paramount to improving the welfare of poultry in processing plants. More research on this issue is required before the Proposed Draft can be finalised.

*The proposed standards must better safeguard the welfare of poultry at abattoirs and on-farm.*⁷²

The assessment of welfare at the processing stage was provided in the Proposed Draft. Under the Humane Killing guidelines on page 34, an exposure of 35 seconds of CO2 and inert gases were recommended for killing. Also “captive bolts”, “blunt trauma” and “exsanguination” were acceptable. The effectiveness of these methods to kill from a processor’s perspective appears to be overlooked entirely. We are concerned as to whether the drafting process involved consultation with actual slaughterhouse workers and owners. Welfare-relating processing issues within abattoir facilities, we fear, may be undeclared due to strict regulation of the meat industry. It is also possible that the reviewed science used to decide upon the Proposed Draft is outdated and limited. The Draft RIS further does not consider mobile slaughter facilities. The Victorian Government’s *Farmed Bird Animal Welfare Science Review* does, however recognise slaughter as a vital part of the farming process.

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 water bath and controlled atmosphere stunning systems, a requirement for CCTV cameras in all abattoirs, and designated animal welfare officers in all abattoirs. More requirements are also needed in chapter 10 – humane killing to include unacceptable methods.

Lighting

*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.*⁷³

In pasture-based systems, rotations allow previously used areas to be exposed to sunlight and the drying effects are very beneficial against pathogens. With proper access to shade, birds can control the level of lighting that they require.

⁷¹ Temple Grandin, On-farm conditions that comprise animal welfare that can be monitored at the slaughter plant.

⁷² RSPCA

⁷³ RSPCA

Lighting programs may be required in cases where there overcrowding, which can cause feather pecking and cannibalism. However, this would rarely occur in pasture-based systems were birds have the ability to carry our normal behaviour in lower stocking rates.

We support RSPCA's recommendation in relation the lighting: 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. We add to this recommendation that this be a temporary Standard in consideration of a recommended phase out of indoor poultry systems.

Induced Moulting

The Proposed Draft permits induced moulting in certain circumstances. *They allow forced moulting where birds coming towards end-of-lay undergo a period of stress because of a sudden change in feed and, as a result, lose a large amount of feathers and body weight.*⁷⁴

Coordinated induced moulting is manipulation of hens' endocrine system, reproductive tissue and function, lymphoid structure and immune function. It is done by environmental and nutritional cues and used in domestic hens to regress and regenerate the reproductive tract. In the industry, this increases egg production and the quality of eggshells.⁷⁵ However, induced moulting can induce temporary recrudescence of lymphoid tissues and may alter immune function in hens.⁷⁶ Studies have found that induced moulting probably has a negative effect on the cellular component of the immune system of the moulted birds.⁷⁷

Other research, which examined the behaviour of hens subjected to different treatments of induced moulting under pre-moult, moult, and post-moult conditions, found that cage pecking increased in fast-induced subjects and aggression increased in fast-induced and nonfast-induced subjects during the moult. In addition, the data found that "gakel vocalisations" in hens may serve as an effective indicator for assessing well-being in a species otherwise behaviourally stoic in expressing stress or discomfort.⁷⁸

The supporting paper to the Draft Standards already identified that induced moulting of hens are associated with the increased incidence of *Salmonella enteritidis*.

We support the RSPCA's recommendation that Standards be introduced to ensure that poultry are not forced to moult.

⁷⁴ RSPCA

⁷⁵ B. Heryanto, Y. Yoshimura, T. Tamura, T. Okamoto, Involvement of apoptosis and lysosomal hydrolase activity in the oviducal regression during induced molting in chickens: a cytochemical study for end labeling of fragmented DNA and acid phosphatase, *Poultry Science*, Volume 76, Issue 1, 1 January 1997, Pages 67–72, <https://doi.org/10.1093/ps/76.1.67>

⁷⁶ WD Berry, The physiology of induced molting, *Poultry Science*, Volume 82, Issue 6, 1 June 2003, Pages 971–980, <https://doi.org/10.1093/ps/82.6.971>

⁷⁷ PS Holt, Effects of induced molting on immune responses of hens, Pages 165–175, Published online: 08 Nov 2007.

⁷⁸ Brenda McCowan, Joan Schrader, Ann Marie DiLorenzo, Carol Cardona, & Donald Klingborg, Effects of Induced Molting on the Well-Being of Egg-Laying Hens, Pages 9–23 | Published online: 04 Jun 2010



Regulatory issues

1. Failure to recognise international examples of such standards.

It is a government responsibility and function to monitor animal welfare developments in other states/territories, countries, research organisations and welfare organisations.⁷⁹ For example, Agriculture Victoria carries out a number of important animal welfare related functions including the above monitoring.

For many years, RSPCA Australia has emphasised the importance of ensuring the standards review process is informed by a thorough review of relevant domestic and international scientific literature, conducted by an independent scientific advisory committee. Internationally, this is recognised as an essential step in the development and review of evidence-based animal welfare standards. Unfortunately, no such process yet exists in the standards development process in Australia. In the absence of a government-initiated independent scientific review, RSPCA Australia provides this review on the current science relating to the welfare of layer hens in cage and cage-free housing systems in Australia.⁸⁰

The Proposed Draft must abide by its self-regulated decision-making principles which consist of ensuring the standards are:

- Desirable for livestock welfare;
- Feasible for industry and government to implement;
- Important for the livestock-welfare regulatory framework; and
- Achieve the intended outcome for livestock welfare.

We emphasise that these principles need to be balanced equally as considerations in the decision-making process, as the process so far has not achieved desirable outcomes for poultry welfare and has favoured feasibility of the industry over considerations of consumers and small-sector farmers.

Recommendation: Explore research on alternative agricultural production occurring internationally in order gain a more comprehensive understanding of the benefits of pasture-based poultry systems.

2. Would the outcomes of the RIS Options meet the [Australian Animal Welfare Strategy](#)?

The goals of the Animal Welfare Strategy (AAWS) focus on animals, national systems, people and the international scene. They include the following:

- **Goal 1: Animals** – The welfare needs of animals are understood and met.

⁷⁹ <http://agriculture.vic.gov.au/agriculture/animal-health-and-welfare/animal-welfare/DEDITR-role-in-animal-welfare>

⁸⁰ RSPCA, The Welfare of Layer Hens in Cage and Cage-Free Housing Systems. <https://www.rspca.org.au/sites/default/files/2016-08%20The%20welfare%20of%20layer%20hens%20in%20cage%20and%20cage-free%20housing%20systems-FINAL_0.pdf>.

- **Goal 2: National Systems** – National systems deliver consistent animal welfare outcomes and give priority to ongoing improvements.
- **Goal 3: People** – People make ethical decisions regarding animal welfare, supported by knowledge and skills.
- **Goal 4: International** – Australia is actively engaged in international partnerships and developments to improve animal welfare.⁸¹

The **vision** was to establish national livestock welfare standards that reflect contemporary scientific knowledge, competent animal husbandry and mainstream community expectations, and that these are maintained and enforced in a consistent, cost-effective manner.

As a cornerstone of the AAWS, the **objective** for national livestock welfare standards, with complementary guidelines, was to provide welfare outcomes that meet community and international expectations and reflect Australia's position as a leader in modern, sustainable and scientifically-based welfare practice.⁸²

The AAWS intended to consolidate information from each of the animal use sectors as well as resources for education and training along with research and development. It was aimed at bringing together all members of the community and is a key information resource on animal welfare for Australia.⁸³ The delivery of these objectives and aims has not been achieved in the Proposed Draft.

In the final cost/benefit comparison between Options A, B, C, D, E, F and G and the final recommendation on a preferred option to AGMIN as part of the Decision RIS, further data should be included about small pastured poultry businesses. This would assist in the assessment of the impacts (costs and benefits) expected under each option, and potentially influence a variation to the options available.

In a Facebook poll by AFSA, asking 'which option would you like the Government to take for the upcoming changes to Poultry Welfare regulations?' (out of the options from the RIS), the following results were provided:

10-year phase-out of battery (cage) systems

57.1%

None of the above (none of the options)

42.9

This shows that there is a considerable percentage of people who prefer to opt for an alternative option.

⁸¹ <http://www.agriculture.gov.au/animal/welfare/aaws>, Australian Government, Department of Water and Agricultural Resources, Australian Animal Welfare Strategy – AAWS.

⁸² See here for the business strategy <http://www.animalwelfarestandards.net.au/files/2011/01/Animal-Welfare-Standards-and-Guidelines-Development-Business-Plan.pdf>

Development of Australian Standards and Guidelines for the Welfare of Livestock BUSINESS PLAN (Revised February 2009)

⁸³ <http://www.agriculture.gov.au/animal/welfare/aaws>, Australian Government, Department of Water and Agricultural Resources, Australian Animal Welfare Strategy – AAWS.

Recommendation: Phase out battery systems in the next 3 - 5 years and 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)⁸⁴, and supporting long-term management of cage-free systems as done across the EU.

Recommendation: Current practice of rearing poultry outdoors on pasture for egg and meat production be considered with the updated or new Regulatory Impact Statement and be added as a supporting paper to reflect the absent data on Australian poultry farms.

3. Public consultation issues

In the past, broad consensus has been achieved amongst all governments and peak industry bodies regarding a preferred process for revising and developing new welfare standards and guidelines.⁸⁵ However, consensus has never been achieved between governments and the small-scale farming sector. Interests have been misrepresented and overlooked prior to and during the drafting process of the proposed standards and guidelines.⁸⁶ The 90-day period of public consultation for the Proposed Draft standards and guidelines provided little opportunity for many farmers to access and review the hundreds of pages of documents to form a view on the animal welfare standards. A list of public consultation was provided as part of the public consultation. To Question 18, we respond that small businesses would be disproportionately impacted on by Options A, but it is unknown for G. Option A, to maintain the status quo, already disproportionately affects small-scale farmers.

No public consultations were immediately offered to members of the public. Information sessions in NSW, including one held in Sydney (a metropolitan location distant from regional rural towns) were only planned last minute and hardly reached the majority of our members.

Lack of consultation with the community and of representation from small-scale growers have exacerbated the trend towards overregulation and red tape. The needs of communities are constantly diversifying, and regulators need to understand and work with communities to get broad agreement before implementing changes. The proposed regulations are not entirely compatible with good regulatory practice, which should achieve policy objectives at the least cost to the community.

⁸⁴ RSPCA (2016) The welfare of layer hens in cage and cage-free housing systems. <https://www.rspca.org.au/sites/default/files/2016-08%20The%20welfare%20of%20layer%20hens%20in%20cage%20and%20cage-free%20housing%20systems-FINAL_0.pdf>.

⁸⁵ <http://www.agriculture.gov.au/animal/welfare/aaws>, Australian Government, Department of Water and Agricultural Resources, Australian Animal Welfare Strategy – AAWS.

⁸⁶ See 'Systemic Collusion' above

Images of Pastured Poultry





Photo from: <https://www.allandaleeggs.com.au/>