

Poultry S&Gs – NSW feedback on Final Draft S&Gs

Background

- “Final” Poultry S&G have been compared to consultation version and concerning changes identified.
- Previously provided feedback has been assessed to determine which recommendations were implemented.
- The table below lists remaining concerns and recommendations that should be addressed. Priority is noted.
- Appendix captures relevant context/background/evidence for recommendations.

Table 1 – Concerns

* see context/previous feedback in Appendix

Item	Standard or Guideline	Issue(s)	Recommendation	Priority
1	Glossary Definition of “commercial production”: A business that engages in the breeding, sale or slaughter of poultry for profit. Commercial production does not include poultry kept for personal use, such as backyard chickens or exhibition poultry.	Definition does not cover poultry egg production.	Insert “...breeding, slaughter or sale of poultry or poultry products for profit...”	High
2	SA 4.8 By 1 July 2025 a person in charge of poultry (excluding layer hens in commercial production) must provide reasonable access to appropriate substrate for pecking, foraging and scratching.	Use of term “substrate” problematic/ambiguous . Use of term “commercial” problematic – unsure of intention but is perhaps a typo.	Replace “substrate” with “substrate or litter” Replace “commercial” with “caged” if this aligns with intention.	High
3*	SA 9.4 A person in charge must ensure that non-fasting induced moulting is not practiced except in exceptional circumstances and where approved by the relevant minister or delegate.	Previous recommendation not adopted.	A phase in period is necessary for this standard to provide industry with the opportunity to make the necessary structural adjustments.	High
4*	SB 1.1 A person in charge must ensure the minimum height of all cages is 55 cm over the useable space	Previous recommendation not adopted. Minimum 55 cm will prevent conversion of existing cages to	Recommend height of 45cm in the useable area is sufficient for the welfare of birds in furnished cages.	High

		furnished cages. Major equipment suppliers do not manufacture cages 55cm high as this is not in line with international standards		
5*	<p>SB 1.11 A person in charge must ensure that all caged laying chickens have the following useable space:</p> <ul style="list-style-type: none"> • 750 cm² per bird if kept in a cage of 2 or more birds • 1000 cm² if a bird is kept in a single cage. <p>NB: Useable space is space that has sufficient height to allow a bird to move freely and perform normal postures and does not include nest areas and structures such as raised perches and feed troughs.</p>	<p>Previous recommendation not adopted.</p> <p>Other jurisdictions require 750cm/bird (or approx. 600cm/bird useable space). 750cm/bird useable space equates to a total floor space of approximately 900cm² bird. Thus proposed standards for space allowance are considerably higher than in other jurisdictions.</p> <p>This impacts on validity of RIS assumptions.</p>	Recommend that 750cm ² per bird/refer to total space vs useable space	High
6*	<p>SB 1.14 A person in charge must not exceed a stocking density in ideal conditions indoors of 30 kg/m² (measured as bird density in the useable space) for rearing laying pullets and for managing adult laying chickens.</p> <p>SB 3.11 From 1 July 2032, a person in charge must not exceed a stocking density in ideal conditions indoors of 30 kg/m² (measured as bird density in the useable space) for pullets and adult birds (including roosters).</p>	<p>Term “in ideal conditions indoors” is not defined nor practical to enforce. Inappropriately subjective/vague term to use in a standard.</p>	<p>Remove phrase “in ideal conditions indoors” from both SB 1.14 and SB 3.11</p> <p>See comments below regarding definition of useable space.</p>	High
7	<p>SB 3.10 A person in charge must ensure that all caged chicken breeders have as a minimum:</p> <ul style="list-style-type: none"> • 750 cm² of useable space allowance per bird if kept in a cage of 2 or more birds • 1,000 cm² of useable space allowance if a bird is kept in a single cage. 	<p>The phase in period that has been applied to SB 3.11 is not necessary as this stocking density does not represent a change from the Model Code of Practice (Appendix 2 A 2.1.2 Max liveweight for rearing</p>	<p>Remove phase in period from SB 3.11.</p> <p>Add phase in period of “From July 2032” to SB 3.10.</p>	High

	<p>SB 3.11 From 1 July 2032, a person in charge must not exceed a stocking density in ideal conditions indoors of 30 kg/m² (measured as bird density in the useable space) for pullets and adult birds (including roosters).</p>	<p>layers and breeder birds and adult birds).</p> <p>A phase in period should apply to SB 3.10 as this space requirement represents a significant change.</p> <p>(It is queried whether this may have been a drafting error rather than a difference in intent)</p>		
8*	<p>SB2.6 Monitor and record the relative humidity, ammonia and maximum temperature levels daily</p> <p>1. take reasonable action to reduce stocking density if relative humidity, temperature and ammonia levels consistently exceed the following parameters over 3 or more consecutive days:</p> <ul style="list-style-type: none"> – relative humidity 70% – temperature 32°C – ammonia levels 15ppm <p>SA7.3 By 1 July 2025 a person in charge of poultry in sheds used for commercial production must monitor ammonia levels and ensure immediate corrective action is taken if ammonia levels exceed 15 ppm at bird level in sheds.</p>	<p>Previous recommendation not adopted.</p>	<p>20ppm ammonia is suitable for the welfare of birds.</p> <p>Clarity required re: whether all three criteria (humidity, temp and ammonia) would need to be met at the same time to trigger stock density reduction.</p>	High
9*	<p>Glossary</p> <p>Definition of “showers”: Bathing system for ducks that provides a sufficient stream of water from overhead nozzles of a suitable pressure to allow all ducks constant, full-body access to bathing water.</p>	<p>New term added since previous draft. Term “constant” not appropriate. This will cause excessive moisture in the litter and create biosecurity risks.</p>	<p>Remove word “constant” from the definition.</p>	High
10	<p>Scope</p> <p>“The standards apply to all those responsible for the care and management of poultry, including commercial producers including free-range, backyard poultry owners and poultry</p>	<p>Problematic wording around free range.</p> <p>Current wording/phrasing implies backyard poultry and poultry</p>	<p>Remove phrase “including free range”.</p>	High

	fanciers, and exclude the transport and slaughter of poultry which are covered under separate standards and guidelines.”	fanciers are commercial producers. Inappropriate to single our free-range from the other commercial producers. Glossary definition of “commercial production” is sufficient.		
11	SB 3.7 A person in charge must ensure roosting space for layer breeders is not less than 15 cm per bird.	Phase in period should apply (as per SB 1.9) As current minimum is 7.5cm.	Include phase in period for SB 3.7 that is consistent with that of SB 1.9, as listed in SB 1.13	High
12	SB 1.5 Where a veranda is provided, it must be designed, constructed and maintained to encourage birds to access the veranda area and to provide: <ul style="list-style-type: none"> • adequate shade and shelter • adequate air exchange to manage airflow, temperature, humidity and dust • suitable substrate. 	Glossary notes a veranda is an “enclosed roofed area...” however this may not be a common interpretation. Wording in SB 1.5 is ambiguous	Use term “enclosed veranda” rather than “veranda” in SB 1.5	Low
Additional issues not included in previous feedback to DAWE				
	The definition of “useable space” has been changed in the S&G. Space taken up by equipment (nest boxes, feeders, perches etc) are to be excluded from calculations of useable space.	This means the practical stocking density is lower for the same kg/m2 of useable space for the S&G than the MCoP (ie it reads the same but means something different). For breeder birds where nest boxes are used in production it is estimated the change in definition of useable space results is approximately 10% reduction in effective stocking density. This change would be expected to have a significant and immediate impact on industry, given the phase in does not	There should be a defined phase in period for all standards which refer to the term useable space. The phase in period should be commensurate with the level of change.	HIGH

		appear to apply to all related standards.		
	SB 1.14	<p>The standard for stocking density for non-cage layers 30 kg/m² of useable space) for rearing laying pullets and for managing adult laying chickens.</p> <p>This is the same wording as MCoP however the proposed new definition of useable space results in a reduction of effective stocking density of sheds.</p> <p>This will immediately impact approximately the stocking density 50% of layer hens in Australia.</p>	A phase in period should be provided for any reduction in stocking density	
	SB 3.1	<p>The standard for stocking density for meat and laying chicken breeders housed in cages requires 55cm height over the useable space. This is a significant change to the MCoP provisions which are 40cm over 65% of the floor area and no less than 35cm.</p> <p>The proposed standard does not include provision of a phase in period.</p>	A phase in period should be provided in line with that proposed for similar changes proposed to cage height in SB1.1	
	SB 3.10	<p>The standard is for stocking density for meat and laying chicken breeders in cage systems. This proposes a change to 750cm² – 1,000cm² for birds which is a significant change to the MCoP which provisions which</p>	A phase in period should be provided in line with that proposed for similar SB1.13	

		<p>range from 550cm² to 1,000cm².</p> <p>There is no phase in period for this proposed standard.</p>		
	SB 3.11	<p>The standard for stocking density for chicken meat and layer breeders is 30kg/m² of useable space. This is the same wording as the MCoP, however the proposed new definition of usable space results in a reduction in the effective stocking of sheds.</p> <p>There is little scientific evidence to support the need for additional floor space for chicken meat breeders provided by this change in the definition of usable space.</p> <p>Technical papers prepared to support the S&G Consultation Draft noted no evidence was found to support a change to the stocking density as described in the MCoP for chicken meat breeders.</p> <p>International jurisdictions have chicken meat breeder stocking density at 34kg/m²</p>	<p>Stocking density for chicken meat breeders should be 34kg/m² to provide for exclusion of nest boxes, feeders etc in useable space, thus resulting in no practical change to existing standards per MCoP.</p>	
	SB 13.7	<p>The stocking density thresholds in the final draft of the S&G have reverted to those proposed in the S&G Consultation Draft and vary considerably from</p>	<p>A phase in period should be provided for any reduction in stocking density</p> <p>Thresholds for stocking density for turkey broilers should</p>	

		<p>the 2021 draft that SAG provided feedback on.</p> <p>This impacts the stocking density for lighter weight/younger birds resulting in lower permissible stocking density between 6kg and 13 kg. This is a reduction of 4kg/m² to 16kg/m² from existing maximum permissible stocking density for birds up to 13kg</p> <p>Standards proposed in Final Draft S&G reflect those proposed in the Consultation draft 2016, which were costed in the CRIS</p> <p>There is no phase in period proposed in the Final Draft for these changes.</p> <p>There is limited scientific evidence or standards in other countries that support this change.</p>	<p>be reviewed to reflect those proposed in the March 2021 SAG draft which provided for increased space allowance for lighter birds compared to MCoP (42kg/m² useable vs 46kg/m² for birds under 13kg).</p>	
	<p>SB13.7 – Stocking density relating to breeding stock</p>	<p>The Final Draft reflects the text in the MCoP, with turkey breeders to be stocked at 30kg/m².</p> <p>This change is a considerable variation from the 2021 draft that SAG provided feedback on which proposed 50kg/m².</p> <p>This results in an effective reduction to stocking densities due to the S&G definition of useable space.</p>	<p>Stocking density for turkey breeders should only apply to sexually mature/production birds.</p> <p>(Birds in the rearing phase (juvenile birds) should be stocked at the rate of turkey broilers.)</p>	

		<p>At 30kg/m2 useable space this is an effective reduction in useable space.</p> <p>Turkey breeder production includes a rearing phase and a production phase, when they commence breeding.</p> <p>Birds in the rearing phase are similar to turkey broilers at the same age and it is thus industry practice that they are stocked at similar rates</p> <p>Turkey breeding standards (i) have different stocking densities for rearing (ii) stocking densities for production birds are slightly higher than 30kg/m2 per MCoP and final draft S&G.</p> <p>Removing juvenile/rearing turkey breeders from the provisions for breeders would significantly reduce industry adjustment.</p>		
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Appendix

Item	Context/feedback	Evidence
3	<p>Industry practices</p> <p>Moulting is currently practiced by some producers in the Australian layer industry. Some flocks will be placed on farm at the time the S&G is implemented in 2022, with the plan that the birds will be moulted.</p> <p>Immediate implementation of SG9.4 will result in:</p> <ul style="list-style-type: none"> - An adjustment to placement schedules for the following flocks to accommodate the shortened 	<p>Industry adjustment issues associated with restricting the practice of moulting are outlined in the RIS, and these include:</p> <ul style="list-style-type: none"> - 2.95 million layer hens are routinely moulted annually; 15% of the national flock - Cessation of moulting would reduce production of lay by 16%

	<p>flock lay cycle. This adjustment may not be able to be made due to pullet shortages.</p> <ul style="list-style-type: none"> - A shortage in bird supply/availability as more pullets will need to be reared. - A shortage in egg supply due to unplanned production cycle disruption - An unforeseen increase in bird supply costs for the businesses that had intended to moult <p>Recommendation: A phase in period is necessary for this standard to provide industry with the opportunity to make the necessary structural adjustments.</p>	<ul style="list-style-type: none"> - An additional 2.4% hens would be required at the beginning of the annual production cycle to maintain the same level of production
4	<p>Industry practice</p> <p>The current standards in Australia require 40cm cage height over 65% of the cage with a minimum height of 35 cm.</p> <p>Some cages installed in NSW/Australia following the previous update to the poultry standards are “enrichment ready” or “enrichable”. That is, the cages were built so furnishings could be installed/retrofitted. It is unlikely that any will be 55 cm high as this is above current standards for cage height in most international jurisdictions where colony/enriched cages have been mandated or are being phased in.</p> <p>Accessibility of equipment</p> <p>Equipment installed in Australia is produced by large international companies. Standard equipment will reflect international welfare code requirements. With most countries having a minimum height requirement of 45cm, a cage height of 55cm will mean Australian producers have to purchase customised equipment which will be more difficult to access and more costly.</p> <p>Query</p> <ul style="list-style-type: none"> - Cage height influences the height at which useable perches can be positioned, and also impacts the capacity for birds to maintain a normal posture. - GA5.5 and GB1.25 indicate birds at normal posture are 35cm high. - SB1.1 requires 55cm cage height across the useable space, which is defined as the space that has sufficient height to allow a bird to move freely and perform normal postures. 55cm is significantly higher than required for normal posture (35cm – per GA5.5 / GB1.25). 	<p>Example - Big Dutchman Enrichable Colony Cages have a minimum cage height to 45cm across the useable space. https://www.bigdutchmanusa.com/wp-content/uploads/2016/08/AVECHIIIEnrichable_Eng.pdf</p> <p>Comparative minimum cage height standards: Canada – 45cm UK – 45cm including useable area NZ – 45cm except nest area</p> <p>*Struelens, E., F. A. M. Tuytens, L. Duchateau, T. Leroy, M. Cox, E. Vranken, J. Buyse, J. Zoons, D. Berckmans, F. Odberg, and B. Sonck. 2008a. Perching behaviour and perch height preference of laying hens in furnished cages varying in height. <i>British Poultry Science</i> 49:381-389. doi 10.1080/00071660802158332</p>

	<ul style="list-style-type: none"> - Research shows the effect of reducing cage height from 55cm to 45cm influences perch selection (where perches of varied heights were available), however there is no evidence that bird welfare is adversely impacted at 45cm, where adequate head space is provided for the birds to roost in comfort.* - Perches in enriched cages used internationally are typically 5-10cm high, thus a cage height of 55cm would provide a mean height from the perch to the top of the cage of 45cm; this is significantly more than is required for roosting. - As there is no perch height prescribed in the S&Gs, there appears to be no justification, related to perches or capacity for hens to maintain a normal posture, for cages of 55cm height. <p>Recommendation Consider if cage height of 45cm in the useable area is sufficient for the welfare of birds in furnished cages, given the above comments.</p>	
5	<p>Industry practice The requirement to provide 750cm² per bird of useable space, means a total floor space of approximately 900cm² per bird will be required. This is a high minimum space requirement in comparison to other jurisdictions.</p> <p>The cost of installation per bird space increases with the space allowance per bird.</p> <p>This space allowance may make the installation of furnishings in cages that are enrichment-ready unviable. Currently these cages house birds at 550cm²/bird. At 900cm² total floor space per bird this will result in approximately 37% fewer birds being housed in existing cages under provisions SB1.6-1.11.</p> <p>This will require more poultry sheds and /or farms to be constructed to produce the same number of eggs.</p>	<p>Comparative space allowances in other jurisdictions: Canada - 750cm² total space, including nests, of which 600.0 cm² does not include nest boxes, UK - 750 cm², 600 cm² of which must be usable (over 20cm height) , NZ- 750cm area per hen</p> <p>POULTRY WELFARE STANDARDS AND GUIDELINES – LAYER HEN CAGES SUPPORTING PAPER PUBLIC CONSULTATION VERSION Prepared by the Poultry Standards and Guidelines Drafting Group, Oct 2016 http://www.animalwelfarestandards.net.au/files/2015/07/Public-Cons-Version-Poultry-Layer-hen-cage-support-paper-Oct-16.pdf</p>
6	Amended wording for SB 1.14 and SB 3.11 was introduced in final version i.e., addition of the phrase “in ideal conditions indoors”	
8	Industry practice / implementation	Birds under 32-35 days old have very limited market value and removal or destocking of these birds mid-way through

	<p>Require clarification that ALL three criteria need to apply rather than one or more of the criteria (for 3 days).</p> <p>Require clarification that relative humidity and temperature levels refer to in-shed only conditions (not outside ambient conditions). It is unlikely that it would be feasible to immediately reduce stocking density should humidity, temp and ammonia exceed the nominated parameters, particularly for birds under 35 days of age.</p> <p>We query the revision of the maximum permitted ammonia levels from 20ppm (SAG3 draft S&G) to 15ppm in the consultation draft S&G. 15ppm ammonia level would be the most stringent in the world and may be unfeasible or unattainable in Australia. (note: MPI New Zealand hen welfare standards list 20ppm ammonia as the maximum permitted level before intervention is required).</p> <p>Recommendation: Consider if 20ppm ammonia is suitable for the welfare of birds.</p>	<p>a growing cycle is not feasible as there is nowhere for the birds to go. Further, destocking during a cycle would likely impact supply and demand, as finished-product chicken meat supply is typically forecast many months in advance.</p> <p>Stocking densities are determined by processors, not growers. Truly difficult periods of high humidity and temperature are occasional and usually can be managed using tunnel sheds. However the 15ppm ammonia level which would be the most stringent in the world may make these criteria unattainable.</p> <p>Code of Welfare Layer Hens (mpi.govt.nz) Minimum Standard No 8 Ventilation.</p>
9	<p>Bathing system for ducks that provides a sufficient stream of water from overhead nozzles of a suitable pressure to allow all ducks constant, full-body access to bathing water.</p>	<p>The definition is problematic. Providing constant, full-body access to bathing water will have adverse consequences in terms of wet litter, anaerobic litter conditions and elevated ammonia levels together with foot pad dermatitis and insanitary living conditions. Industry best practice is to ensure litter moisture between 15-25%. Constant bathing water for all ducks will raise litter moisture levels and produce harmful effects and will confound industry's ability to adhere to SA 8.3. See note below: Directly contravenes/contradicts: SA 8.3 Where litter is used, a person in charge must manage litter to minimise caking, dustiness or wetness that impacts on the welfare of poultry.</p>