

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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Feedback on the standards as they are currently worded may include, but does not need to be restricted to:

- General feedback/comments
- Suggested changes
- Specific areas for improvement
- Proposed alternative wording for standards
- Suggestions for the development of new/additional standards
- Pointing out areas of confusion or lack of clarity or intent
- Practicality of standard implementation
- Production aspects not currently included in the Standard.

To establish a clear pathway for continuous improvement, we seek insights from industry and supply chain stakeholders on the technical, practical, commercial and other challenges that must be addressed to meet the Standard. **Specifically, we invite your input on the actions required to overcome these challenges and the estimated timeframe for implementation.** Additionally, we welcome feedback from others with an interest in meat chicken welfare regarding the opportunities presented to drive substantial change.

RSPCA Australia kindly requests that this feedback form be completed at an organisational level. Please consolidate and summarise all feedback from your organisation into a single submission form.

When completed, please return this form by COB **Friday 17 January 2025** via email to rspcaapproved@rspca.org.au marked 'RSPCA Approved Standard review 2024 - Feedback on November 2024 consultation draft Meat chicken Standard [Organisation/Name]'.

SECTION 1: Specific questions for meat chicken processors

<p>Higher welfare strains</p> <p>What is your organisation's estimated timeframe for adopting higher-welfare meat chicken strains for commercial production?</p>	<p>We note that SLOWER GROWING strains will also affect the ability of farmers to grow the birds, and therefore insist on commenting in this section.</p> <p>We disagree with the proposal to adopt SLOWER GROWING strains because there is no current evidence that under Australia's nutrition, environment, stockmanship, management and breed combination that SLOWER GROWING strains offer any benefit over current strains.</p> <p>There should be no timeframe for implementation at present, because this will be dependent on acceptable responses to each of the following:</p> <ul style="list-style-type: none">- Evidence under Australian conditions that the proposed new breeds will actually achieve better welfare than the current strains. We suggest commissioning of the Animal Welfare Science Centre with a steering committee including growers, RSPCA and processors. Start point is breeder flock performance, end point is finished carcass. Criteria measured must include mortality (all cause), mortality ("genetic issues"), feathering, growth, FCR, cortisol levels, flock uniformity, carcass acceptability egg and chick viability, disease levels and severity, stocking density, air quality during longer periods in the shed to catching weight, catching and transport stress.- The proposed breeds are UK breeds. We have no idea how they will perform under Australian conditions particularly in relation to wheat-based diets and heat tolerance. Therefore, to seek to define these as "higher welfare strains" are inappropriate until this is proven.- We have no idea of the different management requirements of these proposed new breed and any potential animal welfare disbenefits as a result.- We have no idea if the proposed breeds will be acceptable to the consumer for eating quality, cost, visual aesthetics, and ability to cook. If these breeds are not acceptable to the consumer, they are unlikely to be acceptable to the supermarkets.
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RSPCA Approved Standard review 2024

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	<ul style="list-style-type: none">- One of the proposed breeds is marked as “indoor only”. How is this compatible with welfare requirements for free range birds or even birds on verandas?- There is an assumption that current breeds “automatically” have genetic issues/problems. Where is the evidence to prove this; given that in the last 20 years the Australian and international industry has taken significant steps to “breed out” (in part or whole) issues like leg problems or circulation issues?- You note that <i>“Breeds genetically selected for more welfare-focused traits can help address some of these welfare issues”</i>. CAN is not the same as WILL, therefore a solid scientific “baseline” of current welfare needs to be established, or it will be defined as just marketing.- Slow growing birds will be associated with higher feed use, longer periods in sheds, which means far more sheds with the associated higher carbon emissions and environmental destruction loads. RSPCA has the luxury of being a one-policy organisation, farmers do not.- Slow growing birds will increase the required shedding to feed the population. that means a significant number of additional sheds on current farms and additional farms on greenfield sites well beyond that needed for rapid population growth, which is a significant environmental issue.- The RSPCA’s own paper (on the knowledgebase) notes the environmental and carbon emissions concerns related to slow growing breeds. On these grounds alone the element requires removal. See also “general comments” below.
<p>Electrical waterbath stunning systems</p> <p>What is your organisation’s estimated timeframe for transitions from electrical waterbath stunning systems to alternative stunning methods?</p>	<p>Not relevant to meat poultry farmers, please consult processors</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

SECTION 2: Feedback on Meat Chicken Standard (November 2024 Draft)

STANDARD or SECTION (e.g. 1.01 or Training and competency)	COMMENT ON EXISTING STANDARD	SUGGESTED CHANGES AND REASON FOR CHANGE
3.03 current standard, 3.05 proposed standard: Chick Placement	<p>The current standard: <i>“placed within the shed as soon as possible after arrival of the transport vehicle”</i> works well.</p> <p>Proposal: <i>“...placed within the shed within 60 minutes”</i></p>	<p>Delete proposed new standard. Proposed standard imposes an arbitrary timeline of 60 mins with no scientific justification and no reason. OF COURSE it is best interests for chicks to be unloaded as soon as possible, but an arbitrary timeline raises the question is what is to happen if the 60 mins are exceeded - REGARDLESS of the state of the chicks! Are remaining chicks to be euthanased to meet the timeline and therefore pass audit? If there is an equipment failure in the shed and fixing it slows chick placement, is the truck to return to base with chicks still in it? This is NOT ABOUT THE BIRDS WELFARE.</p>
3.04 current standard, 3.06(b) proposed new standard “	<p>Current standard <i>“....must not be tipped from a height >30cm”</i>.</p> <p>Proposal: <i>“... must not be tipped from a height >20cm”</i></p>	<p>Current Standard appears to work well. Delete proposed new standard. There is NO evidence (and hence NO “Rationale” in the explanatory notes) that “30cm” (proposed) vs “20cm” (current) has had any different effect on bird welfare to the current. Moreover, reducing the height increases the bending of the operator - increasing workplace health and safety risk. AND it’s unenforceable. Are auditors going to make surprise raids with little rulers to check? We are happy to reassess only when we have independent data clearly demonstrating that there is an <u>actual</u> improvement to animal welfare by reduction of 10cm, and even then this will have to be assessed against WHS risk as this as the latter is prosecutable in law.</p>

RSPCA Approved Standard review 2024

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4.05 current standard, 4.02 proposed new standard	<p>Current standard <i>“Feeding and drinking equipment must be operating effectively to ensure the birds’ daily requirements for feed and water are met”</i></p> <p>Proposed: <i>“feed and water must be palatable...”</i></p>	<p>Current standard works well. Delete proposed new standard. How is a human to assess that the feed and water is “palatable” other than to assess if the birds are eating and drinking? Are we now to stratify levels of palatability, and if so, how? Does the RSPCA actually envisage a situation where a processor would deliberately feed his birds UNpalatable food and water? Does the RSPCA think that farm operators would deliberately make the birds suffer (including economically) by providing useless food?</p> <p>Are the auditors going to conduct “palatability” checks on food and water and if so, is a human taste test valid for a chicken? If it can’t be audited, then it is NOT a “Standard”. This proposal is unenforceable, and must be deleted.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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<p>12.04 current standard, proposed standard 4.03: Feed and Water Withdrawal</p>	<p>Current Standard: <i>“Birds must not be off feed or water for more than 18 hours prior to slaughter”</i>.</p> <p>Proposed Standard: <i>“Birds must not be off feed or water for more than 12 hours prior to slaughter”</i></p>	<p>Delete proposed new Standard. Revert to 18 hours. The existing 18 hour standard works well and minimises welfare detriment at the processing plant. This measurement includes pickup setting up, picking up, crating, transport, lairage, and slaughter.</p> <ul style="list-style-type: none"> - Please provide <u>evidence</u>, under Australian conditions including hot and cool weather, that animal welfare is increased by this change between turn-off of feed/water supply and death. Your rationale actually suggests the measurement criteria for the required scientific study: distress (cortisol levels), dehydration, weight loss, muscle breakdown (%CL), and mortality. - There IS good scientific evidence that reduction in feed intake during hot weather increases the ability to cope with heat stress. This is at odds with your proposed change. Hence part of the reason why a proper study is required. - The Rationale provided has a lot of “may” “might” and “can” - PROVIDE DATA! - For good animal welfare at the processing plant, bird should be “empty” or there is a risk of regurgitation, choking and highly stressful death! - There is an issue in pickups from large farms - we do not want to have to turn trucks around because of the shorter time limit (carbon emissions, bird stress, revisit with additional flock stress). - Time calculations have to allow for the first birds caught right through to the last birds caught out of sheds. Rushing this process to suit an arbitrary timeline risks severely stressing the birds. The alternative is an additional pickup, further stressing the flock and particularly if remaining numbers of birds in the sheds is small. - We do not want to have to put birds back onto feed and water and then withdrawn for a second time, with all the associated stress, because of an arbitrary standard

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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<p>5.09 proposed new standard, not present in current standard: <i>“For chicks ≤7 days of age, where gas heating is used in sheds, carbon monoxide level must not exceed 10ppm.”</i></p>	<p>Not present</p>	<p>Delete as unnecessary. RSPCA has provided NO science to justify the addition. CO is not produced in the burning of propane unless heaters are non-functional (C3H8(g) Propane + 5 O₂ (g) Oxygen → 3 CO₂ (g) Carbon dioxide + 4 H₂O (l) Water + Heat). CO may be produced in very low amounts when natural gas is used for heating, IF the equipment is not serviced. Burning LPG gas may produce CO, but only if combustion is inefficient, which would not be in farmers interests as it wastes money.</p> <p>In any event, CO₂ levels rise much faster and will warn the farmer.</p> <p>CO poisoning Symptoms in meat chickens are observed at between 600 & 1000ppm, and death within 1.5 hours at 1500ppm (Carlson and Clandinnin 1963). CO is lighter than air, so detection of 10ppm (even if it was possible), would be at human level, and chickens are likely exposed to less.</p> <p>Most CO detectors trigger at 30-70ppm. And ultra sensitive detectors around 25ppm. We are not aware of any standard meters that will detect 10ppm, making this standard unenforceable.</p> <p>IF AND WHEN RSPCA provides solid scientific evidence (and they have not done so) of CO issues/problems over 10ppm in meat poultry sheds in Australia, we are happy to revisit our stance.</p> <p>In any event, the proposed standard postulates that chicks more than 7d of age can be exposed to any amount of CO, which is ridiculous - and it is also not demonstrated in science that this occurs.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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<p>5.17 and 5.18 Current Standard, 5.08 and 5.09 Proposed standard: Temperature and ventilation</p>	<p>Current: <i>“For birds >7 days of age, shed conditions must be managed so ammonia levels do not exceed 15ppm at bird head height. 5.18 Ammonia readings must be taken in every shed: a) at least twice per week upon first entering the shed in the morning, or b) at least twice per week within one hour after any litter maintenance activities have ceased.”</i></p> <p>Proposed: <i>“Air quality parameters in the shed at bird head height must not exceed: 10ppm of ammonia for chicks ≤7 days of age 15ppm of ammonia for birds >7 days of age 3000ppm of carbon dioxide for chicks ≤7 days of age 2500ppm of carbon dioxide for birds >7 days of age. For chicks ≤7 days of age, where gas heating is used in sheds, carbon monoxide level must not exceed 10ppm”.</i></p>	<p>The existing standard seems to be adequate in most situations and appears to minimise any perceived or actual animal welfare detriment</p> <p>Delete proposed new Standard. Revert to current. The proposed changes are unnecessarily complex and not required. Ammonia is not likely to be at 10ppm at <7 days as the chicks are on paper and only occupying part of the shed, more litter is single use or properly turned prior to placement.</p> <p>In your own “Rationale”, excessive CO2 would have negative effects on production that would be noticed immediately and acted on, therefore the proposed standard is redundant. Note also that your “Rationale” refers to fast growing strains, but paradoxically don’t want farmers to use them - again rendering this proposal redundant.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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<p>5.25 Current Standard, Proposed 5.16 Revised Standard: Lighting- Light/Dark periods</p>	<p>Current: <i>“Birds >7 days of age, in each 24-hour period, must have a minimum of: a) 8 hours continuous light b) 6 hours darkness, of which at least 4 hours is continuous, unless on the day of catch when <4 hours continuous darkness is permitted”.</i></p> <p>Proposed: <i>“Birds >7 days of age, in each 24-hour period, must have a minimum of: eight hours continuous light eight hours continuous darkness, unless on the day of catching when <8 hours continuous darkness is permitted.”</i></p> <p>.</p>	<p>Current appears to meet the needs of the birds more than adequately Delete Proposed new Standard. Revert to current.</p> <p>Scientific Proof is based on a body of evidence, not selective quoting of preferred individual studies. The RSPCA’s own “Rationale” notes that “most studies [find] photoperiod had no effect on production parameters”. In meat chickens in particular, production parameters are a sensitive and immediate measure of the “happiness” of the birds.</p> <p>The Rationale also notes that “the rate of footpad dermatitis and hock burn was small” and therefore this proposed change may be irrelevant.</p> <p>It would appear from RSPCA’s own Rationale that more work needs to be done on actual welfare outcomes before changing based on “may”. The potential to cause animal welfare detriment if “may” isn’t, is huge.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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<p>5.30 Current Standard, proposed 5.19 Revised Standard: Lighting- Light intensity.</p>	<p>Current: <i>“For birds >7 days of age, the light intensity in the shed (at bird head height) must ensure that, during the light period: a) no area of the shed floor is lit at <10 Lux.(b) the average light intensity across the entire shed floor is ≥20 lux (except during catching).”</i></p> <p>Proposed: <i>“Birds >7 days of age must be provided with light intensity gradients across the shed floor ranging from 10 lux to at least 50 lux at bird head height, unless during catching, such that: a) no area of the shed floor is lit at <10 lux b) the average light intensity across the entire shed floor is ≥30 lux.”</i></p>	<p>Current appears to meet the needs of the birds more than adequately Delete proposed new Standard. Revert to current. This would require complete refit of every shed in the country based on a <i>“review of scientific literature concerning the effect of light intensity on animal welfare indicators and found limited effects”</i> (RSPCA <i>“Rationale”</i>).</p> <p>The <i>“Rationale”</i> then discusses increasing lux to INCREASE food intake, which is directly contradictory to the demand for slow growing birds! The proposal would require retrofitting of every shed in Australia is for the sake 10 Lux, which is ridiculous and offensive given the quote above.</p> <p>This is too complex to implement. RSPCA is demanding variable intensity <i>“light intensity gradients across the shed floor ranging from 10 lux to at least 50 lux at bird head height”</i> but with an average of ≥30lux without sharing a proposed measuring system. With intentional variable intensity, without a clear measuring procedure farmers run the risk of inadvertently the risk of <i>“failing”</i> an audit, with horrendous consequences to the birds if a farm is suspended and <i>“unapproved”</i> birds have to be dumped in landfill.</p> <p>Light intensity already varies across a shed due to shading effects from equipment, and so the proposed changes are redundant.</p> <p>There is NO evidence that <i>“giving chickens choice in light intensities is beneficial for bird welfare”</i>. We are happy to properly assess Australian data when it is available.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>New Standard 5.22 and 5.23 - UV Light/Natural Light</p>	<p>No current standard</p>	<p>Delete proposed new Standard. The fact that chickens can “see” UV wavelengths is irrelevant to animal welfare at all or any age/s until proven otherwise.</p> <p>We note a study suggesting (not proving) that UV wavelengths may improve bird health. If this was the case why are free range birds not healthier than barn birds? Clearly the issue needs testing under Australian conditions.</p> <p>RSPCA’s own “Rationale” notes that two of their 3 quoted studies (Rana and Campbell, and Wilcox) recommend further research to better understand the effects of UV light on meat chickens. In other words, RSPCA proposes retrofitting every shed in the country on the basis of an unproven theory. Not Acceptable.</p> <p>Note also that natural light varies significantly according to latitude and season, meaning that there is no constant natural lighting program that can be administered.</p> <p>Our members are horrified by the suggestion of windows in sheds. Windows in sheds are a clear and present RISK to animal welfare. There is NO POSSIBLE WAY that patches of light can be avoided at all times of day due to the Earth’s movement around the Sun. Patches of light increase the risk of bird injury through pecking, litter intake, and crowding in the “sunray” areas. Moreover windows readily transmit heat, increasing the risk of bird deaths due to heat stroke. Further any bird strike or rock thrown up by a mower is likely to break or star the glass or Perspex resulting in shards of glass/Perspex likely to be eaten by the birds, with <u>disastrous</u> animal welfare consequences. Even cleaning said windows to the standard necessary to provide adequate protection from disease incursion risks cracking/chipping of windows with the associated risk to the birds.</p> <p>It is also unclear how RSPCA can specify 4.5% of floorspace and then 30lux with the lights off, surely its one or the other? How bright is an overcast day and does a farmer deal with variability in natural light minute by minute (eg partial cloud)?</p> <p>Further, sheds are oriented where possible with the long side facing North - to avoid the hot western sun hitting the long side of the sheds, and delay heating of the sheds in summer by the eastern face being the short face. Adding windows “down both sides</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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		<p><i>of the shed</i>” directly allows northern sun into the building - even further increasing the risk of heat stress.</p> <p>That windows in sheds are even <u>contemplated</u> in the proposed new standards is a commentary that to the proposed new Standards are NOT science-based and potentially NOT for the “continued improvement” of animal welfare.</p> <p>We are happy to reassess our position on windows if and when properly conducted scientific studies from independent researchers demonstrate conclusively that this will be an appreciable and objectively measured animal welfare benefit to the birds.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>5.33, 5.34, 5.35 Current Standards, 5.25, 5.26, 5.27 Proposed Standards: Perches and Platforms.</p>	<p>Current: <i>“Birds ≥7 days of age must have access to perches.</i></p> <p>5.34 <i>Perches must be provided at a minimum length of 2.7 metres per 1000 birds based on shed placement number, unless: a) for chicks in a brood area, where minimum perch length must at least equal the total perch length based on shed placement number multiplied by the proportion of the shed represented by the brood area.</i></p> <p>5.35 <i>Perches must: a) be evenly distributed throughout the shed b) provide a flat surface c) support the whole of the bird’s foot d) be positioned and of a height to allow birds to perch at all ages e) be provided in a way that they are accessible at all times, unless the shed is being prepared for catching or where temporary removal is required for litter maintenance f) where they have been temporarily removed for litter maintenance, be returned immediately following completion of litter maintenance.”</i></p> <p>Proposed: <i>“5.25 Birds ≥7 days of age must have access to perches and/or platforms, based on shed placement number, at a minimum of:</i></p>	<p>Current Standard: There are reported issues with this requirement in free range operations, where the inclusion of perches indoors appears to be discouraging birds from choosing to be outside.</p> <p>There are also problems with audit where a breach in perch design in one section was accompanied by “acceptable” perching length and design in excess of current minimum requirements throughout the rest of the property has resulted in audit failure.</p> <p>Proposed Standard: Retain the revised glossary definition for perches in the new Standard. Delete all other changes proposed in new Standards.</p> <p>RSPCA’s “Rationale” noted that more perches DID NOT improve to any health or welfare parameters compared to current and there was actually reduced locomotion. Does the fact that birds generally do not use the current perches not indicate a PREFERENCE for the floor? Unless and until there is definitive science, the additional requirements should be deleted.</p> <p>Adding platforms will simply increase the level of clutter in the shed. Birds MUST be able to move around freely and engage in behaviours including escape from bullying without having to negotiate a myriad of obstacles including feed and water lines, perches, platforms, and litter conditioning machinery. Birds MUST be allowed to rapidly move out of the way of stockpersons as they see fit without clutter. Additional clutter in the shed increases the risk of accident and injury to humans and birds, and makes observation of the state of the birds more difficult (particularly platforms, where birds may not be easily observed). Additional clutter in sheds makes management of litter with litter conditioning equipment difficult to the point of impossibility at maximum density. Clutter is <u>detrimental</u> to animal welfare.</p> <p>This is also directly contrary to 5.02, which requires <i>“fixtures and fittings to.... facilitate cleaning”</i></p> <p>It is also unclear what outcome is expected. At what age is the level of use to be assessed? How is a farmer to know what % of birds they are targeting at different</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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	<p>a) 2.7m of linear perch space per 1000 birds b) 0.41m² of flat platform space per 1000 birds.</p> <p>5.26 From 1 January 2028, birds ≥7 days of age must have access to perches and/or platforms, based on shed placement number, at a minimum of: a) 5m of linear perch space per 1000 birds b) 0.75m² of flat platform space per 1000 birds.</p> <p>5.27 Perches and/or platforms must: a) be evenly distributed throughout the shed b) support the whole of the bird's foot c) be able to be adjusted at heights from at least 5cm to 30cm d) be adjusted over time to allow birds access at all ages e) always be accessible to birds, unless the shed is being prepared for catching or where temporarily removed for litter maintenance f) where they have been temporarily removed for litter maintenance, be returned promptly following completion of litter maintenance".</p>	<p>ages. On what criteria is a farmer to be punished if birds choose not to use the apparatus?</p> <p>It's worth noting that the proposal to have platforms evenly distributed throughout the shed fails to understand that meat poultry do not have access to the whole shed for a substantial duration of the grow-out. Therefore the proposal for platforms suggests that the majority of them will not be used for the duration of the growout, which is a blatant waste of resources for no demonstrable gain. Moreover, any "rush" of birds to one side of a platform (novel incursion causing rapid move away) risks tipping over a platform and smothering the birds beneath, Unless the proposed platform are to be build so robustly they will be too heavy to move/clean without significant WHS risk.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>5.37, 5.38, 5.39 Current Standard, 5.28, 5.29 Proposed Standard, Environmental Enrichment.</p>	<p>Current: <i>“5.37 At least one pecking object must be provided as environmental enrichment for every 1000 birds based on shed placement number, unless: a) for chicks in a brood area, where minimum number of pecking objects must at least equal the total number of pecking objects required (based on shed placement number) multiplied by the proportion of the shed represented by the brood area.</i></p> <p><i>5.38 Environmental enrichment must: a) be provided with an even distribution throughout the shed to allow ease of access for all birds b) be provided in a way that is accessible at all times, unless the shed is being prepared for catching or where temporary removal is required for litter maintenance c) where it has been temporarily removed for litter maintenance, be returned immediately following completion of litter maintenance.</i></p> <p><i>5.39 Environmental enrichment must be maintained, replaced or changed as necessary to ensure birds have continuous access.”</i></p> <p>Proposed:</p>	<p>Current: Alter. Note that “even distribution throughout the shed” fails to take account of the fact that birds do not have access to the whole shed area until it is required by their growth. It should read “even distribution throughout the area where the chickens are” located” or suchlike.</p> <p>Proposed: Further increases clutter on shed floor</p> <p>Please REMOVE the statement “to maintain interest for the birds”. There is NO way to determine how “interested” a bird is, and in any event as they move throughout the shed “new” toys are always on offer. We have NO evidence that birds remember enrichment objects in other parts of the shed.</p> <p>There appears to be no objective way to determine “interest” and shifts the responsibility to the farmer(who is NOT a signatory to the contract) to GUESS what will be interesting enough for the auditor. This sets up the farm to fail and get blackbanned without any evidence that bird welfare is actually improved.</p> <p>It is also worth noting that <u>high</u> levels of “novelty” in an enrichment object will encourage crowding, resource protection and bullying in many cases - all detrimental for animal welfare.</p>
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	<p>5.28 Birds ≥ 7 days of age must have access to at least two different types of enrichment object per 1000 birds based on shed placement number.</p> <p>5.29 Enrichment objects must: be a) distributed evenly throughout the shed</p> <p>b) be maintained, replaced, or changed as necessary to maintain interest for birds</p> <p>c) always be accessible to birds, unless the shed is being prepared for catching or where temporarily removed for litter maintenance</p> <p>d) where they have been temporarily removed for litter maintenance, be returned promptly following completion of litter maintenance.</p>	

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>Proposed New Standard 6.02:Verandah</p>	<p>Not included in current standards.</p>	<p>Delete from proposed new Standard.</p> <p>Quoting a study that “enables” a bird to choose is NOT proof of improved animal welfare. “Activity” is NOT, of itself, proof of improved animal welfare, since “preference testing” has been shown to be poor quality science based on short term novelty rather than long term NEEDS. The “researchers” are likely to have cognitive and confirmation bias as their entire well-funded careers have generally been in “welfare” studies. There is little to no other data from which to determine proof.</p> <p>Moreover, verandas are a clear and present disease risk for any disease that is spread by air, including Avian Influenza and ILT. To proposed this at a time of heightened risk of Avian Influenza H5N1 is completely inappropriate.</p> <p>Verandas are a clear and present risk to predation, which is amply demonstrated by losses in free range farms.</p> <p>Verandas are a clear and present danger to biosecurity in that they are very difficult to adequately clean (can’t fumigate).</p> <p>Verandas are also a clear and present opportunity for interaction with wild birds to the detriment of all.</p> <p>Note that this proposal also <u>directly contradicts</u> the current requirement to “<i>limit the entry of pathogens, pests and animals that could cause distress or transmit disease to the birds</i>”. THIS INLCUDES SIGHT, SOUND AND SMELL and therefore includes proximity, which CANNOT be avoided with verandas.</p> <p>Verandas will directly disbenefit birds. Birds at 14 days of age are not even fully feathered and most still require the application of a heat source. Chilling on verandas is a real possibility, or birds may choose to remain within the shed, and due to the proposed scoring system a farmer may be inappropriately blacklisted as a result. Verandas also significantly increase the risk of heat stress due to inability to properly control temperature conditions <u>in the shed</u> - increasing the risk of bird deaths. This is NOT beneficial for animal welfare!</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

		<p>Note also that the proposed requirements for Verandas directly impinge on the proposed requirement for windows down each side of the shed. Does the RSPCA realise/care that it is demanding conflicting requirements?</p> <p>Moreover, because of the preferred orientation of sheds, it is likely that the verandas will either be on the northside of the shed with significant risk of heatstroke, or on the southside with significant risk of chilling depending on the time of year. As a result, it is unlikely that these will be fully utilised by the chickens. Will the farmer therefore be blackbanned on the points scoring system because the chickens choose to stay inside?</p> <p>There is no commentary on the construction on the verandas. Are these to be concrete floored and roofed for shade (at which point they are virtually indistinguishable from “traditional” curtained sheds) or earth floored and mesh roofing (at which point it is impossible to clean/disinfect or keep out disease/fomites)?</p> <p>If birds have access to an “outdoor area” with “cover”, that’s called a free range farm.</p> <p>In short, RSPCA is now proposing a third category of meat chicken production, that of “indoor/outdoor”.</p> <p>IF there is sufficient evidence to demonstrate that birds NEED verandas for the sake of their animal welfare, then such a requirement should be (a) demonstrated comprehensively under Australian conditions, and (b) be made mandatory for all sheds - otherwise we will have a form of “animal welfare apartheid” depending on which sheds a chicken grows up in. The current proposal is an admission that the science is not proven and the element must be deleted until proof of worth is established.</p> <p>That RSPCA is proposing verandas which are so clearly to the potential detriment of net animal welfare leads the cynic to ask whether RSPCA either doesn’t understand poultry farming or has resurrected their agenda to remove intensive farming.</p> <p>There is a reasonable argument that broilers grown to around 63 days of age (and not able to be turned into verandas until after 14 days) are unlikely to benefit from verandas, as, on RSPCA’s own “Rationale”, the birds use a veranda area increasingly</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

STANDARD or SECTION (e.g. 1.01 or Training and competency)	COMMENT ON EXISTING STANDARD	SUGGESTED CHANGES AND REASON FOR CHANGE
		<p>over time. Given that not even all of the shed area is used until the birds are big enough, the potential disbenefits far outweigh the benefits for broiler chickens.</p> <p>However, <u>subject to high quality science demonstrating an actual and ongoing animal welfare benefit</u> to meat chickens, verandas may be useful for broiler breeders who have a substantially longer lifespan and for whom any welfare benefit may be magnified. We are happy to examine this data when it is available.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>7.07 Current Standard, Proposed Standard 7.03: Outdoor Area.</p>	<p>Current <i>“The outdoor area must be designed and actively managed and maintained to: a) encourage birds to go outside b) encourage birds to access all areas c) provide birds with palatable vegetation d) provide overhead cover e) be well drained to avoid muddiness and the accumulation of water f) control disease and parasites g) avoid injury or mortality h) minimise the risk of fire”</i></p> <p>Proposed: <i>“7.03 The quality of the outdoor area must be such that the outdoor area is designed, actively managed, and maintained to:</i></p> <ul style="list-style-type: none"> <i>a) encourage birds to go outside and access all areas</i> <i>b) prevent overcrowding</i> <i>c) provide birds with opportunities to dust bathe and forage</i> <i>d) provide birds with palatable vegetation</i> <i>e) provide overhead cover.</i> <p><i>7.04 The openings to the outdoor area, for each side of the shed where access is provided, must be designed, constructed, and positioned to:</i></p> <ul style="list-style-type: none"> <i>a) give birds a clear view of the outdoor area from within the shed</i> <i>b) allow birds to pass through and access the outdoor area easily and unhindered using a normal posture</i> <i>c) comprise of at least 30% of the length of the shed</i> 	<p>Modify Current Standard, as it is ridiculous. “Palatable vegetation”? Are we supposed to taste it? Are we to study the tastes of a chook?</p> <p>Should read “Ensure birds do not have access to toxic vegetation”. Note that many plant species that are highly toxic are also highly palatable!</p> <p>Proposed: delete proposed new standard. Has it not occurred to RSPCA that “encouraging” birds to go outside and to “access all areas” may not be the <i>preference</i> of the birds? Research shows that in many cases birds prefer to be indoors, yet apparently they are to be “forced” outside where there are pathogens, predators, heat, cold and rain.</p> <p>Where is the evidence that it has to be 30%?</p> <p>How is it possible to avoid “overcrowding” when ranging is supposedly voluntary?</p> <p>Where is the definition of a “dust bathing opportunity” and there is no indication of how this would be assessed at audit.</p> <p>Moreover, RSPCA notes peak foraging times as 9-10am Vic (presumably AEDST), and 6-7pm - precisely the time in which predatory activity peaks. Rats are also a significant (and unstoppable) predator and disease carrier species in outdoor areas. Current research already shows clearly that free range meat poultry have lower welfare outcomes, with increased mortality.</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

STANDARD or SECTION (e.g. 1.01 or Training and competency)	COMMENT ON EXISTING STANDARD	SUGGESTED CHANGES AND REASON FOR CHANGE
	<p>d) <i>be evenly distributed along the length of the shed</i></p> <p>e) <i>take into account prevailing weather conditions.</i></p> <p>7.05 Overhead cover must be designed, constructed, positioned, and maintained to:</p> <p>a) <i>comprise at least 30% of the available outdoor area</i></p> <p>b) <i>encourage birds to access and use all parts of the outdoor area</i></p> <p>c) <i>be distributed evenly across the total available outdoor area</i></p>	

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>11.03 Current Standard, 11.02 proposed new standard: Euthanasia.</p>	<p>See Standards booklets, very lengthy.</p>	<p>Both current and new standards are grossly inadequate.</p> <p>Rewrite current &/or delete proposed new Standard. The current standard only considers “routine” euthanasia and there MUST be a caveat to recognise specific issues associated with emergency disease management. That this standard only considers “routine” euthanasia must be stated.</p> <p>We believe that captive bolt is probably no longer appropriate except in turkeys (and this MUST be stated that this is only for turkeys) or birds over 3kg as needed. We support the use of inert gas mixtures and CO2 ONLY IF effective guidelines are developed on use as inappropriate use can have poor welfare outcomes. It is also worth noting that gas units require birds to be taken to the units, with significant animal welfare risks.</p> <p>We agree that “traditional” VSD is probably NOT appropriate for “routine” euthanasia even though the supposed science demeaning this method is deeply flawed. However VSD/+ may need to be called on in the face of an emergency to euthanase large numbers of birds at speed who are suffering from a rapidly evolving virus spread by aerosol, such as demonstrated in the USA. In this latter case, failure to move with speed may result in many thousands of additional birds on additional farms requiring destruction: this is a clear animal welfare failure/detriment which was amply illustrated during the 1999-2000 Newcastle Disease outbreak in NSW.</p> <p>Banning in-house/rapid methods like VSD/+ outright may also result in thousands of birds dying in agony <u>from the disease</u> in the name of (legitimate) concerns about a minute few. Not to use the fastest and most broadly effective method to depopulate entire sheds/farms would be negligent in terms of NET animal welfare outcomes for the identified population, (notwithstanding the need to identify and follow up the few).</p> <p>In addition, the stress and welfare disbenefit of catching birds and multiple shed entries in order to use other methods must be considered and <u>have not been</u> in any study presented to date. Depopulation is an emergency disease is about best possible welfare of populations, not individuals.</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

STANDARD or SECTION (e.g. 1.01 or Training and competency)	COMMENT ON EXISTING STANDARD	SUGGESTED CHANGES AND REASON FOR CHANGE
		<p>Further, a new VSD method involving Nitrogen gas and another involving prior sedation are under test now and may overcome the issues identified with “traditional” VSD or VSD+.</p> <p>We STRONGLY recommend avoiding <i>banning</i> any method of euthanasia, rather proscribing the situations where any method <i>might</i> be used, including a cascading decision tree based on urgency, availability of substrate, R_0 of disease and numbers of birds affected/likely to be affected. We are happy to work with RSPCA on that process.</p> <p>In any event, ANY discussion of VSD/VSD+ is not relevant to this Standard because the authority to choose this method in an emergency disease situation lives with the Chief Veterinary Officer in charge of the disease eradication program. Is RSPCA seeking to manipulate CVO decision making? In any event any bird destroyed in this manner will not be sold and hence will not need to be compliant with the Standards, so any discussion of VSD/VSD+ in this section is overreach and irrelevant.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>10.06, 10.07 Current Standard, 10.3 Proposed New Standard :Catching</p>	<p>Current: <i>“10.06 Birds must be caught, picked up and carried individually with both hands supporting the bird’s body while holding the wings against the bird’s body or with one hand securing the legs and the other holding the bird against the person’s body, unless: a) during catching for slaughter or shackling when birds may be caught, picked up and carried by the leg b) during catching for bird husbandry procedures when birds may be caught by one leg, and picked up and carried by both legs c) where birds are transferred between sheds as part of a brood-and-move system when birds may be caught, picked up and carried by the body using one hand d) for chicks, where they may be caught, picked up and carried by the body using one hand e) prior to euthanasia, where the bird may be picked up by the base of both wings and supported by the breast.</i></p> <p><i>10.07 Where birds are carried by the leg during catching for slaughter, no more than four birds may be carried in one hand.”</i></p> <p>Proposed:</p> <p><i>“10.03 Birds must be caught, picked up, and carried individually with both hands supporting the body of the bird while holding the wings against their body or</i></p>	<p>Current Standard operating inadequately. Number of pick-ups are currently 9 on some properties/ batches, but the audits are not detecting this and it IS an animal welfare issue!</p> <p>Proposed: Delete proposed new standard. Wing flapping is NOT proof of animal welfare disbenefit <i>per se</i>, it is a natural behavioural reflex to inversion. Analysis of dead broilers is NOT proof that the death or injury was <u>caused</u> by the method of carrying. A finding of wing injury is NOT proof of a causal relationship with 2LCM or 1LCM. We note the RSPCA’s comments in the “Rationale” that “ <i>2LCM provides a more balanced grip and [reduces] bird movement (Humane Society of the Unites States, 2009)</i>”, which is directly contrary to the proposed new standard. A finding of a “risk” of leg damage is NOT proof that 2LCM <u>causes</u> leg damage, but it does warrant further study.</p> <p>Holding a bird by the body in one hand significantly increases the risk of the bird falling, or flying unsuccessfully - a direct animal welfare detriment. What is also not even considered is that the proposed methods reduce the number of birds that can be carried per trip - significantly increasing the number of flock incursions - and each flock incursion causes stress to ALL the birds and may result in “stack ups” with multiple deaths. Crushing/smothering deaths, even accidentally, <u>must</u> be considered to constitute an animal welfare disbenefit.</p> <p>Unless and until a broader ranging examination of ALL aspects of the science is provided, the current standard should remain.</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

STANDARD or SECTION (e.g. 1.01 or Training and competency)	COMMENT ON EXISTING STANDARD	SUGGESTED CHANGES AND REASON FOR CHANGE
	<p><i>with one hand securing the legs and the other holding the body of the bird against the person's body, unless: for chicks, where they may be caught, picked up, and carried by the body using one hand</i></p> <p><i>during catching for transport, when birds may also be caught by both legs then picked up and carried by holding both legs in one hand, with no more than two birds in each hand. “</i></p>	

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

STANDARD or SECTION (e.g. 1.01 or Training and competency)	COMMENT ON EXISTING STANDARD	SUGGESTED CHANGES AND REASON FOR CHANGE
10.06, 10.07 Current Standard, 10.3 Proposed New Standard :Transport	As Above	<p>Current Standard: Works adequately</p> <p>Proposed: Delete proposed new standard. The “Rationale” for the proposed new standard appears to compare birds transported for more than 2.5 hours with those not transported at all, and it is on that basis that the new 8 hour total time limit is proposed?!</p> <p>In broad terms we all agree that minimising transport time is preferred. However, to impose arbitrary timelines without <u>conclusive</u> science risks the potential for truck breakdowns to result in chickens forced to be “let loose” on the side of the road if the arbitrary time is exceeded (as happens presently with livestock). The proposal also completely fails to consider that the most appropriate minimum time will differ according to day or night pickup, time of year, temperature and humidity at the time of pickup and transport, the metabolic rate/size/weight of the birds, crate design and the packing method (ventilation between crates).</p> <p>Yet again, we recommend AGAINST flawed science and arbitrary limits and instead focus on the BIRDS - mortality in transport %, fractures in transport %, crushes in the shed %, for example.</p>
<p>13.27 Current Standard, 13.10 Proposed New Standard: Slaughter-Low atmospheric stunning</p> <p>13.27 Current Standard, 13.10, 13.11 Proposed New Standard: Slaughter-Electrical Waterbath Stunning</p>	No comment	Lies beyond the scope of farming: we suggest you request comment from APIA

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>9.05 Current Standard , 9.03, 9.04, 9.05, 9.06. Proposed New Standard: Welfare Assessment</p>	<p>Current: “9.05 From 21 days of age, weekly assessments must be made on a sample of 25 birds representative of the flock per shed, recording for each bird: a) hock burn score b) foot pad lesion score.”</p> <p>Proposed: “9.03 From 7 days of age, weekly assessments must be made for each shed of the birds’ level of interaction (absent/low, moderate, high) with and/or use of: a) perches b) platforms c) enrichment objects.</p> <p>9.04 From 14 days of age, where a veranda is present, weekly assessments must be made for each shed of the birds’ level (absent/low, moderate, high) of veranda use.</p> <p>9.05 From 21 days of age, where an outdoor area (free range) is present, weekly assessments must be made for each shed of the birds’ level (absent/low, moderate, high) of outdoor area use.</p> <p>9.06 From 21 days of age, weekly assessments must be made on a sample of 25 birds representative of the flock per shed, recording in the following order for each bird:</p>	<p>Current Standard is adequate.</p> <p>Proposed: Delete proposed new standard. The proposed “Standard” quotes protocols from similar marketing schemes (eg AWIN). That does not constitute science. It is NOT, for example, a consensus of a group of PhD level cardiologists (ACVIM protocols) or PhD level Kidney specialists (IRIS) who do not make money from the Internationally agreed Guidelines that they propose.</p> <p>We are aware of no peer reviewed scientific study that links any of these “scores” to ACTUAL animal welfare outcomes. Unless and until this work has been completed, these should not be used.</p> <p>In fact, there appears to be only limited science, if any that truly demonstrates the value of perches and platforms. They are used poorly by birds, and farms are not R&D facilities.</p> <p>WHAT IS THE PROBLEM if birds CHOOSE not to perch on perches or platforms or engage with enrichment objects at the precise moment of observation? On the one hand the RSPCA requires that birds should have “agency” and paradoxically now they argue that if a “Score” is not high enough the RSPCA decrees that bird welfare has “suffered”?</p> <p>WHAT IS THE PROBLEM if the birds CHOOSE to remain inside the shed and not in a veranda or outdoor area - at all, or at the moment of observation? What will the punishment be to the farmer, at what level, for how long, and when? Does the “secret” points system add up against a farmer because it’s cold and the birds wanted to stay indoors in the warm at the time of audit?</p> <p>HOW is a farmer to determine leg straightness without catching the birds (stressful) then turning them over (stressful) and then measuring with a stick or ruler (stressful)? Why are we deliberately stressing birds in that manner? Is that not detrimental to animal welfare? HOW is a farmer to determine a “gait score” when the birds are happy and healthy and therefore moving around constantly?</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

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	<p>a) <i>gait score</i> b) <i>feather dirtiness score</i> c) <i>leg straightness score</i> d) <i>footpad dermatitis score</i> e) <i>hock burn score.</i></p>	<p>WHAT IS THE PROBLEM if feathers are dirty because birds have been scratching and dustbathing happily in the litter? Will farmers be punished for feathers that are too dirty or feathers that are too clean?</p> <p>Moreover, there is a suggestion in the Rationale that cameras should be used to assess behaviour. If and when there is an internationally agreed system (potentially using AI) we are prepared to assess it for “fit” with farmers’ management systems, but for privacy reasons this is unlikely unless the level of proof of actual improvement of animal welfare is <u>very</u> strong. We note that RSPCA is very unwilling to commit to a similar level of transparency, banning cameras/videos during audits on threat of stopping the audit and leaving the farm unaudited. Any potential agreement should be led by RSPCA transparency of audit including photo/video evidence, second opinion and robust and inclusive appeals mechanism including independent options.</p> <p>It would also be worth undertaking properly constructed independent studies on whether there is a relationship between health indicators and net animal welfare, and the extent to which this is true (or not). If there is a relationship, health indicators are to the benefit of the whole industry and animal welfare companies, are objective and can be readily identified.</p> <p>We all agree that hock burn and foot pad lesions are NOT normal, and NOT a choice and therefore should be measured. Every “score” beyond that is an invention with no impact on animal welfare until proven. Similarly recording illness and abnormality at the abattoir is logical, since the birds are under individual and close inspection anyway and are not stressed by further handling. However there is NO definition of “runts” and this should be removed.</p> <p>RSPCA, sadly, seems not to understand that meat poultry DO NOT LIKE TO BE HANDLED, even by those stockpersons that they know and respect.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>2.02 Current Standard, 2.02 Proposed New Standard: Trigger levels</p>	<p>Current: <i>“2.02 The Veterinary Health Plan must specify bird health management and monitoring procedures including but not limited to: a) biosecurity (including quarantine, cleaning and sanitation procedures) b) routine health monitoring procedures (including identification and treatment of weak, ill or injured birds) c) vaccination schedule and procedures (including vaccinations received at the hatchery) d) use of veterinary medicines (including antimicrobials) e) any other treatments or additives including probiotics f) euthanasia (including emergency mass euthanasia) g) physical injury (including lameness and hock/foot pad lesions and trigger level) h) identification and treatment of disease i) internal and external parasites j) mortalities and trigger level k) pest animal control procedures.”</i></p> <p>Proposed: <i>“2.02 The Veterinary Health Plan must specify bird health management and monitoring procedures that minimise risk to animal health, including:</i></p> <p><i>a)biosecurity including quarantine, cleaning and sanitation procedures</i></p> <p><i>b)routine health monitoring procedures including identification and treatment of weak, diseased, or injured birds</i></p>	<p>Current: needs rewriting</p> <p>Proposed new Standard: Delete</p> <p>By definition, a “Trigger Level” is an objective level beyond which something must HAPPEN. “Feedback” is not an appropriate response to hitting a “trigger level”.</p> <p>While we understand the desire to include animal welfare outcomes in the assessment, the proposals lack any form of defensible science (see AWIN etc above). “SCORES” are subjective and should be deleted in favour of %, or absolute number per “x” examined. “Runts” is not definable and should be deleted. Randomisation charts <u>must</u> be used and transparently communicated/reported.</p> <p>The proposed new standard prescribes “trigger levels” for temperature, humidity and “bird behaviour”(whatever that means). Is the RSPCA now proposing that in the event of an unexpected storm causing high humidity birds should be left in sheds to overreach densities? Is the RSPCA now proposing that if the birds “say” they don’t want to be picked up (bird behaviour) they should be left?</p> <p>A “Trigger level” is only as good as the actual action to be taken - like night-time pick up, or different stacking for ventilation, and this should be defined for each operation based on science.</p> <p>Moreover, we have firm evidence that farms to be assessed are currently NOT being “randomly selected” and this needs to be changed to a randomisation chart.</p> <p>Notably, NO science (even poor science) is quoted in the “Rationale” - a suggestion that this is “made up” and will have no effect on continuous improvement for animal welfare.</p> <p>In any event, “feedback” on system issues eg increased mortality becomes feedback to the processor and not the operator(the farmer) who has no contractual relationship. THIS MUST BE FIXED IN THE CURRENT AND ANY PROPOSED FUTURE SCHEME.</p>
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

	<p><i>c)vaccination schedule and procedures including vaccinations received at the hatchery</i></p> <p><i>d)use and purpose of veterinary medicines (including, where antimicrobials are used, an antimicrobial stewardship strategy)</i></p> <p><i>e)use and purpose of any other treatments or additives (including probiotics)</i></p> <p><i>f)euthanasia including procedures for emergency mass killing events</i></p> <p><i>g)animal-based welfare assessment (including procedures and trigger levels on-farm and/or at slaughter as relevant for: gait score, feather dirtiness score, leg straightness score, footpad dermatitis score, hock burn score, not effectively stunned, not effectively cut, red birds, broken/dislocated bones and bruises, scratch score, breast blister score, breast burn score, runts, and carcass condemnation)</i></p> <p><i>h)control of internal and external parasites</i></p> <p><i>i)mortalities (including trigger levels for 7-day, daily, total flock mortality, leg culls, dead on arrivals (post transport, at placement and at slaughter))</i></p> <p><i>j)bird comfort (including trigger levels for temperature, humidity, and bird behaviour to prevent heat stress and cold</i></p>	
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RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

STANDARD or SECTION (e.g. 1.01 or Training and competency)	COMMENT ON EXISTING STANDARD	SUGGESTED CHANGES AND REASON FOR CHANGE
	<i>stress in the shed, during catching and transport, and in lairage)</i> <i>k)pest animal control procedures.”</i>	

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

ADDITIONAL ITEMS FROM CURRENT STANDARD		
<p>4.08 Drinking Systems must be effectively managed to (c) Minimise dripping of water onto litter</p>	<p>Delete. Again, a facilities requirement and NOT an animal welfare requirement. We are advised that at certain times of the year the only way to achieve this is to reduce water pressure and increase drinker height to make it harder for the birds to drink - NOT GOOD FOR ANIMAL WELFARE!</p> <p>In winter, “water dripping” is most likely as a result of condensation - warm air in sheds meets cold water in metal water lines. The only “solution” is to rotary hoe the litter and terrify and potentially kill the birds - NOT GOOD FOR ANIMAL WELFARE!</p> <p><u>Again</u>, RSPCA appears to believe that the litter is more important than bird welfare. Birds should be able to freely drink, and if that means damp litter under water lines SO BE IT.</p>	<p>The correct outcome measure is overall litter quality, footpad lesions and hock burns, not an area of dampness under a drinker line.</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>5.20: Birds must have continuous access to litter unless, for chicks <7days old in sheds where chick paper is in use.</p>	<p>Needs to change to <u>at least</u> 10 days. RSPCA has advised farmers to rotary hoe or remove chick paper at 7 days if it hasn't broken down, even to the detriment of the birds who may run into the rotary hoe in a panic and die. BUT the processor veterinarians advise that the litter shouldn't be disturbed until after 10 days to allow the coccidiosis vaccine to work properly.</p>	<p>There is no doubt that coccidiosis is a ubiquitous disease of young poultry that causes severe illness, failure to thrive and increased mortality, as well as malabsorption issues in the survivors. It is an obvious and severe animal welfare issue that affects both barn and free range birds.</p> <p>Using a rotary hoe in a shed full of chickens is also an obvious animal welfare disbenefit. The noise, vibration and smell of a rotary hoe may (and often does) panic the birds, resulting in "crowd crush" and death, or running into the blades of the hoe to their death.</p> <p>It CANNOT be argued that "litter for dustbathing" trumps this important animal welfare issue. There should at least be a permanent exemption to allow a suitable window for those birds treated with coccidiosis "vaccines".</p>
<p>5.22: "The floor of the shed must be covered in litter...that is actively maintained in a dry and friable condition"</p>	<p>This is a facilities standard that is resulting in bird deaths, so it is NOT an animal welfare standard.</p>	<p>Rewrite to... "...that is actively maintained so that birds can access a dry and friable area for dust bathing/scratching within 2m of any point in the shed". We accept that the 2m is arbitrary, but this avoids having to rotary hoe at full density in winter (condensation), or at peak summer (misting/high bird water consumption) and killing birds unintentionally through "crowd crush" or running into the blades. THIS IS AN ANIMAL WELFARE ISSUE!</p>

RSPCA Approved Standard review 2024

Feedback form: Stakeholder Consultation on RSPCA Approved Farming Scheme Standard - Meat chickens (November 2024 Draft)

<p>Various places: Veterinary Health Plan.</p>	<p>The current (and proposed new) Standard should note that where the birds have a treatable disease (eg bacterial, nutritional, fungal, protozoal), it MUST be treated.</p>	<p>Because there is a requirement to report on antimicrobial use AND that treatment is not specified in the Standards, we are seeing increased number of cases where birds that COULD be treated to reduce disease-based suffering are not being treated. In some cases it is because buyers want “antibiotic free” meat.</p> <p>This results in significant animal welfare disbenefit, increased mortality and potentially unnecessary euthanasia of birds that would not have required euthanasia if they had been treated. This also results in poor efficiency performance, indicating ongoing welfare disbenefit to the birds.</p> <p>We find that nutritional issues are being acted on quickly, anything requiring antimicrobials much less so.</p> <p>Oddly, this is an area of valid and blatantly obvious animal welfare concern (and <u>not</u> a facilities issue) that is not and has not been addressed by the supposed “Welfare Standards”</p> <p>Not to include this into the current Standard would be an admission that animal welfare disbenefit is both OK and selective.</p>
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GENERAL FEEDBACK/COMMENTS

Given that RSPCA has traditionally been associated with quality animal welfare science, these proposed new Standards are a disappointing list of ambit claims that include proposed requirements that will actually detriment animal welfare.

We are most disappointed to discover “conclusions” in the text that do not match the study data, single studies purporting to “prove” anything, poor quality science and a predictable cavalcade of authors who have made their academic careers on “animal welfare” funding.

Although we are grateful for the disclaimers and additional information recognising some of these issues that have been included in the “Rationale”. The following are relevant:

1. The single most significant issue that should stop all further discussion of any proposed new Standard is that there is NO evidence that the current scheme has improved the animal welfare of any meat bird in Australia beyond that which is incorporated into the [National Animal Welfare Standards and Guidelines for Poultry](#)

The current scheme MUST be assessed for outcomes before any new proposed Standards are introduced. The RSPCA loudly advertises its commitment to “continuous improvement” of animal welfare in meat poultry industries (a laudible objective!) when it has NO proof that even the current Standards have provided continuous improvement over the recognised National Standard (and if so, how much). Unless and until it has been clearly independently proven that the current Standards have “continuously improved” animal welfare over the last 16 years of operation, NO new Standards should be considered. Without this data, all RSPCA claims about the current and proposed future scheme are simply misleading marketing puffery and the entire scheme should be deleted.

It would be a different matter entirely if RSPCA had been auditing against the independent and nationally recognised Animal Welfare Guidelines, which (although RSPCA had extensive input into their generation) are recognised as independent of any advocacy organisation.

2. General comment: The definition of the [RSPCA Standard](#) advertises (highlighting author’s): “*The standard allows for enriched indoor and outdoor housing that **meet[sic] the needs** of the birds.*”

NEEDS are not the same as “wants”. NEEDS are defined as things that are essential for survival and well being. “Well being” can be objectively defined on this basis. Animals can only survive in environments where their needs are met. Objective production and physical parameters may be an excellent proxy for general animal welfare in many cases and may be underutilised as assessment measures, subject to further work being undertaken on the nature and extent of the relationship.

Sadly, many of the ambit claims in the document, which are either NOT identified as “needs” or there is poor/no science to identify whether it is a need or not, is simply that - an ambit claim - something that someone thinks a chicken OUGHT to want.

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In the example of outdoor space: someone thinks a chicken OUGHT to want to run around outdoors; research shows the chickens, given the choice, often CHOOSE to remain indoors. This has been a significant issue in free range egg production systems where there is a *competition policy* requirement for labelling legality that the birds are outside for a specific portion of the day, often resulting in unwilling chickens being *chased* outside. That is the key reason why quality, peer reviewed and extensive independent scientific observation and publication is so necessary: humans can design any study to give the results they want, or interpret data a number of ways to “prove” what they think a chicken OUGHT to want. Some think that meat chickens OUGHT to be “active”. Given the choice, so many meat birds simply chatter among themselves close to food and water supply. A standard that genuinely focuses on demonstrated NEEDS would be better respected.

3. Any Standards scheme, and particularly this one that has enormous potential to cause direct and significant harm to people and businesses who have no contractual arrangement with the scheme, should have Standards that would be clearly defensible in a Court case alleging tort, or misleading representations. This is not the case for the current or proposed new Scheme. Key issues like transparency, sound and ethical appeals mechanisms, second opinions including veterinary, and objective criteria/Standards that are academically defensible under the conditions in which the scheme is conducted are all missing from the current and proposed new Standards. Both the current and any proposed new Standards should be assessed against this criteria. Notwithstanding any legal cases, RSPCA faces continued and high level criticism from animal activist groups about this scheme and the “court” of media attention/public opinion is equally an issue for the Standards. This has been a significant and very damaging issue for RSPCA UK, for example. RSPCA is respected in Australian society, but not untouchable as past cases have shown. We all have a key interest in RSPCA continuing to be seen as Australia’s peak and ethical animal welfare organisation.
4. General comment: There is a sound argument that RSPCA has and always has had a fundamental conflict of interest in operating the entire scheme, given that RSPCA is paid directly by the groups it purports to regulate and that RSPCA has a concurrent role as inspectorate/prosecutor, and as policy advocate - which in the past has directly advocated for elimination of “factory farms”. RSPCA should consider divesting the scheme to a genuinely independent company which includes users, farmers and processors on the Board as well as welfare advocates. The “reasonable man” has no clue that RSPCA is 7 (8?) supposedly independent companies and hence does not separate the paid marketing scheme from the regulatory function. It is worth noting that this conflict of interest has been well highlighted in recent media relating to the RSPCA UK scheme. The current proposal to charge farmers (who are not signatories to your contracts) for property audit will further entrench a conflict of interest, and we have an obligation to our members to ensure that, if implemented, such obvious conflict is widely proselytised. This includes any proposal to charge processors (for their own or the farmer’s audits), since the latter will be inevitably passed back to farmers and the conflict of interest remains.
5. The scheme current is, and the proposals seek to entrench, what is largely a facilities scheme. The new proposals including verandahs, windows and the like, will create a strata of different shedding types and therefore by definition either:
 - Is an admission that this scheme is about facility standards and not a reflection of actual bird NEEDS, OR
 - Is simply a wish list of things that humans think a chicken OUGHT to want that is not and was never defined as a need.

The truth is that the proposals in the new Standard are NOT reflective of chicken NEEDS. Chicken production in Australia is amongst the most efficient and most welfare-friendly in the world. The truth is that there is relatively little assessment of bird *welfare* in the scheme on objective measures by qualified persons, and lots of assessment of facilities, and paperwork. That facilities are NOT the best proxy for animal welfare was more than adequately illustrated by Hemsworth and others nearly 30 years ago, and this is reflected by RSPCA themselves in parts of the document Rationale. For example, there is no apparent assessment of stockmanship anywhere in the document (training is NOT stockmanship!), yet this is the key driver of responsiveness to animal welfare NEEDS.

6. A valid scheme is only as good as the “buy-in” - not just from supermarkets, but also from consumers. Expressed consumer preferences in many studies do not match their actual buying habits - something that has been elegantly demonstrated time and time again in the egg purchase studies. Consumers trust that the government has oversight of animal welfare in Australia - they cannot name the National Welfare Standards but understand that standards exist. This is illustrated by the minute and falling percentage of votes for “animal welfare” or “animal justice” parties at elections. Continually demanding more expensive, complex “standards” that are not NEEDS and are not well grounded in science, risks RSPCA making the scheme irrelevant or untenable - with the associated loss of income and PR value to RSPCA.
7. Meat poultry farmers have had this scheme forced upon them by processors. Farmers are not signatories to the scheme and therefore are forced to adopt the current standard without any recourse to appeals in the event of corrupted audit, any option for a second opinion or any ability to control the significant costs of implementation of the Standards without recompense. Similarly, a farm, that is not a signatory to the scheme, can be blackbanned by RSPCA, eg for Minor breaches in audit; without appeal and with costs to the affected farmer running into \$hundreds of thousands. This is unconscionable and must be rectified. Standards MUST be properly justified.
8. There is a strong and valid argument that RSPCA is demanding more “wish list” inputs while having no idea whether the current Standards have or have had any value over the last 16 years. Unless and until the current Standards are objectively shown to have genuinely improved actual animal welfare beyond that in the National Guidelines, the proposed new scheme remains just a wish list marketing scheme with no identified baseline. There would be greater respect for the new proposals, and better buy-in, if we had any proof that the current Standards had actually improved bird welfare and by how much. We strongly suggest an independently (or joint industry/RSPCA) funded, independently operated study to determine the animal welfare value, if any, of the current scheme and a solid plan of how to assess the proposed new scheme prior to embarking on a new wish list. It is not possible to “continuously improve” from an unknown base.
9. The proposed new Standards do not address some clear and present issues with the Current Standards, and we are gratified by RSPCA actively seeking comments on the operation of the current standards. For example, we have good evidence from all states that the current RSPCA litter requirements (facilities standard) is directly resulting in bird deaths - there is NO animal welfare benefit! We have evidence of animals not being treated for disease as this is not assessed in real time (to meet the requirements of other government standards)- a clear animal welfare detriment. The current Appeals mechanism is opaque and has no input from farmers who are audited; and more importantly NO opportunity for independent arbitration (as occurs in a huge % of similar schemes). In

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addition we have evidence that RSPCA threatened to stop an audit if photos/video were taken - a clear case of trying to suppress transparency and a recognition that the current audit scheme is subjective. While we do have evidence that there is a genuine attempt to ensure similar audit standards across Australia, we can find no farmer who has been given a copy of the qualifications of the auditors that enter their farms and there is no ability to request an alternative auditor (which would not be an issue if there was unanimity in the application of standards), and no ability to request a second opinion - a mandatory element of an *ethical* scheme. Neither the current or proposed new Standards address issues of biosecurity breaches caused by entry to farms by auditors or movement around sheds - where any disease breach or “crowd crush” as a result is to the clear detriment of animal welfare.

10. The proposed new Standard significantly increases the observational load at all levels of the life cycle. Sadly there is no evidence that sitting in an office marking pieces of paper improves animal welfare outcomes. Equally, there is no evidence that pieces of paper will solve any perceived concerns about errors in observation or even numbers of observations. Adding to the paper load is less time that farmers will be working for the welfare of the birds. NO new observational requirements should be introduced unless and until there is evidence that this will improve animal welfare outcomes.
11. RSPCA cannot be held ONLY to be interested in chicken welfare: it has a responsibility to all animals on the planet. While that sounds grand:
 - Requiring such slow growth that hundreds of new sheds have to be built to continue to feed the population, resulting in loss of native species on all the necessary greenfield sites, IS an animal welfare issue for the entire life of that species, not just the 63 days of a broiler’s life.
 - Changing the requirements to dramatically increase the use of fossil fuels to rear the birds, while climate change is wiping out entire species, IS an animal welfare issue and for decades into the future, not just the 63 days of a broiler’s life.
 - Changing the requirements to require extensive retrofitting with significant waste of resources and hence greenhouse gas and fossil fuels, IS an animal welfare issue and for the entire future of the affected species, not just the 63 days of a broiler’s life.

This is not a suggestion that we ignore bird welfare!

It IS, however, a suggestion that any changes that we make to the current or Proposed Standards should be

- so strongly established by science as NEEDS (as per the advertising for the scheme), not “wants”;
- that any broader effects on unintended species via carbon emissions or environmental degradation are validated and declared transparently, with a formal comparison with the likely situation under the National Guidelines alone.

It IS a suggestion that the Current Scheme needs to be properly and independently assessed as providing actual animal welfare benefits beyond the National Standard, not only to validate the current scheme but also to provide a baseline for future “wish list” changes.

Neither the RSPCA nor the industry populated this country with 27M people. But as one of the world’s most efficient providers of Australia’s least cost and most consumed meat protein, this industry does have a responsibility to feed them; in as animal-welfare friendly way as possible and with as minimal larger effect on the environment as possible. This must be based on sound, relevant and quality science, with demonstrated clear and transparent benefits beyond the National Guidelines and transparent identification of the positive and negative consequences of the scheme. We look forward to working constructively with RSPCA to achieve Standards that are demonstrable under Australian conditions, ethical and just, and defensible.

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