

# RSPCA Approved Farming Scheme Standards – Pullets Consultation Draft 2015

Submission from the Australian Veterinary Association Ltd



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## 18 May 2015

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 8500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

## General Comments

Thank you for the opportunity to comment on the draft standards which provide basic principles and general guidelines for the care and rearing of layer pullets. The requirements for a comprehensive Animal Care Statement and Veterinary Health Plan, as well as the requirement to review these annually, are strongly supported. The Veterinary Health Plan should be developed with the assistance of an experienced poultry veterinarian.

The inclusion of requirements for environmental enrichment and dust-bathing facilities are also supported.

It is recommended that the draft include more prescriptive and quantifiable standards in a number of areas, to assist participating farmers to more easily comply with the scheme. A compilation of comments from our members is supplied below, and we hope that this information is useful to you.

## Comments on individual sections

1.09 - enhanced monitoring of temperature minimum and maximum and controls (particularly alarms for low temperature) in the first week is recommended. Cold floors and draughts must be avoided to ensure good welfare.

1.11 - increased monitoring should occur for at least the first 4 days. Layer chicks have very low appetites and are more susceptible to chilling, poor light intensity and starving out

2.10 & 2.02 – quantification of minimum feeder and drinker space (cm/bird and drinkers/bird) should be included.

2.07 – birds must always have unrestricted water, with the exception of short periods off water prior to vaccination or medication, under veterinary advice. Particularly in extreme heat birds must always have unrestricted access to feed and water.

Encouraging the birds to empty the feed troughs once per day at an older age, particularly when birds are on mash diets, is also critical to allow them to eat up the small particle size nutrients in the feed (containing essential macro and micro nutrients, anticoccidials etc) rather than picking out the large particles, and develop appetite for the laying period.

3.01 – recommend that minimum and maximum temperatures are provided. At least 32°C floor and air temperature should be maintained during brooding, as well as having adequate cooling to achieve 10°C below outside temperature.

3.04 & 3.05 – it is recommended that minimum temperature alarms are present during the brooding period to alert to any heater failure

3.10 - it may be useful to specify biosecurity measures such as Boot sterilizers, change in / change out procedures etc

3.17 – for the first 3 weeks of life, birds need extended periods of light to eat, develop appetite and to develop good skeletal structure for the future. It is recommended that 8 hours darkness is achieved by 4 weeks of age

3.18 – 20 lux is recommended during brooding to ensure chicks can find food and water easily. If pecking behaviours develop it is recommended that light intensity be reduced.

3.19 – gradual light adjustments risks piling up of birds and smothering.

3.32 - recommend inclusion of a statement addressing how to manage the litter, ie what are acceptable methods of

removing wet, dirty litter when there are birds present.

3.35 (d) - could there be further description of what types of perches would be most comfortable for the birds as a better guideline to producers.

3.36 - Environmental enrichment - are there any suggestions available to farmers as to what appropriate pecking objects would be?

7.01 – the facility should have a designated veterinarian that is available 24 hours a day if needed for emergencies

7.04 - add 'the veterinarian should be provided with the records listed in 6.18'. A veterinarian should visit the premises at least annually. This can coincide with the RSPCA assessment.

7.08 - Injurious pecking behaviour - sub optimal flock management, nutrition, health and husbandry can result in an outbreak of injurious pecking behaviour. It is recommended that there be stronger emphasis throughout the draft standards on quantifiable measures such as

- quantification of minimum feeder and drinker space (cm/bird and drinkers/bird) as mentioned above. It is believed that flocks reared and in production with insufficient feeder and drinker space are more likely to have issues with poor uniformity and therefore are more likely to pick.
- weekly weighing of a statistically significant number of birds to monitor bodyweight throughout rearing against the breed standard

This should allow improved investigation of possible causes of increased mortality, and allow intervention before injurious pecking behaviour develops.

There should be clearer guidance on actions to be taken when an outbreak of injurious pecking behaviour develops, or if the pullets are going to a laying farm with a history of these issues (eg light dimming, additional beak trimming if necessary)

Other quantifiable requirements that may be of benefit are:

- The use of water meters to ensure adequate water is available
- An annual water test indicating the water is of quality standard
- Specified feed quantities to meet the needs of the birds

7.09 - it may be useful to specify a proportion of the flock rather than 'a large number'. This could assist in providing guidelines to the farmer.

8.02 – it may be worth including a mention of methods acceptable for whole-shed euthanasia in the event of an emergency disease outbreak.