

Animal Welfare (Layer Hen) Code of Welfare Report

1. This report accompanies a revised version of the Animal Welfare (Layer Hen) Code of Welfare (the Code), dated 13 August 2004, the original version having been sent to you on 19 April 2004. As required by the Animal Welfare Act 1999 (the Act), a copy of the original code and report was also sent to the writing group. The original draft was written by a writing group convened by the Egg Producers Federation (EPF), the statutory body representing the interests of New Zealand egg producers.
2. Following receipt of the original code, the EPF provided two written submissions on the code, one dated 24 May 2004 (later revised to 1 June 2004) and the other dated 27 May 2004. The submission dated 1 June 2004, essentially contained four major issues and these were subsequently discussed with you in a meeting with EPF representatives on 9 June 2004. It was agreed at this meeting that the EPF should discuss this submission directly with the National Animal Welfare Advisory Committee (NAWAC), and that consequently occurred on 22 June 2004. A further submission was received on 28 June 2004, following a meeting between EPF representatives and NAWAC representatives.
3. The submission dated 27 May 2004 contained issues of a minor nature and as notified to you, this submission was sent directly to the National Animal Welfare Advisory Committee.
4. The submissions are appended to this report.
5. As a result of its deliberations on the submissions, NAWAC has made some amendments to the codes, which are outlined below.
6. **Submission 24 May 2004/1 June 2004**

6.1 *The EPF believes that NAWAC has misconstrued the intent of the Act with regards to its statement that cages do not meet the obligations of the Act (Animal Welfare Act 1999) since they do not fully comply with section 4. In its view the EPF believes that cages per se do not breach section 4 of the Act.*

NAWAC Response

- 6.2 NAWAC recognises that this statement needs to be more clearly written, as it did not intend to convey that all cages did not meet the

obligations of the Act. The intention was for this to apply to current or conventional cages in use in New Zealand i.e. those providing up to 550 sq.cm minimum floor space per bird. NAWAC has amended the code to clarify this.

NAWAC wishes to restate its previous comments in the first report that it still wishes to see current cages phased out but will not make a final decision until it reviews the code in 2009. In the meantime, NAWAC considers that a minimum standard of 550 sq.cm/bird should apply from 10 years from the issue of the code (i.e. 2014), with a phase-in period of a minimum of 500 sq.cm applying to all cages from 2008.

- 6.3 The industry appears to still be unclear about the difference between 'current practice', 'established practice' and 'good practice'. The Primary Production Select Committee, when considering the Animal Welfare Bill, changed the original term 'established practice' to 'good practice', to ensure that industries did not confuse established practice or existing management practices with good practice. It noted that this interpretation was not consistent with the intent of the clause as drafted. It further noted that it believed that the behavioural needs of pigs and poultry being intensively farmed are not being fully met and that such practices are contrary to the obligations of the Act. To equate existing management practices with good practice would mean that making changes to management systems would be difficult and also would clearly not fit with the purpose of the Act.
- 6.4 Parliament did not define the term 'good practice' and left it to NAWAC to assess in its own expert judgment what 'good practice' involves. NAWAC has provided a more detailed definition of good practice in this code than NAWAC has previously proposed in order to indicate more accurately the view NAWAC has applied when considering 'good practice'.

Despite this view expressed in the Select Committee report on the Animal Welfare Bill, NAWAC has reached its own conclusion, that current cages provide an impoverished environment for hens which severely restricts their ability to display many of their normal behaviours. However, while alternative systems generally provide more enriched environments, an ability to display normal behaviours and the ability to move away from other hens, there are potential welfare issues such as feather pecking, cannibalism, greater incidence of disease (including parasitism) and higher mortalities. As previously stated in the first report, NAWAC is unable to recommend replacement of current cage systems with alternative systems (including enriched cages) until such time as it can be shown that, in comparison to current cage systems, alternative systems, in the context of supplying New Zealand's ongoing egg consumption needs, would consistently provide better welfare outcomes for birds and be economically viable.

- 6.5 The industry also seems to be unclear about what ‘the circumstances of the animal’ in section 4 are and argue that economic considerations could apply to the circumstances of the animal. The circumstances of the animal apply to the state of the animal and not to other issues such as economic issues. Economic issues may be relevant to the assessment of good practice or exceptional circumstances. NAWAC believes that the use of current cages does not meet good practice but that the management system can continue for a transitional period because of exceptional circumstances in terms of section 73 of the Act. In which case, NAWAC must take into account the feasibility and practicality of effecting a transition from current practices to new practices, any adverse effects that may result from such a transition, and the economic effects.
- 6.6 In setting minimum standards the physical, health and behavioural needs must be provided for, which includes provision of food, water, shelter, opportunity to display normal patterns of behaviour etc. Within the limits of good practice and scientific knowledge, all physical, health and behavioural needs should be met. The Act does not contain a mechanism for balancing the needs of animals against the limitations of particular management systems, or the ability to trade off between the different needs.
- 6.7 Where there is uncertainty about the feasibility of providing a transition to a new management practice, NAWAC is entitled to make a best assessment in light of the present state of knowledge and, if necessary, accept a current practice about which it has reservations, pending further research. In such a case, minimum standards can be considered under section 73(3), until such time that a transition to a new management practice can be recommended. NAWAC is also entitled, in its assessment of feasibility, practicality and economic effects of any transition to new practices, to have regard to: the likely importance of the disputed need; and the undesirability of initially requiring an industry to move away from a current management practice and then later reversing that decision and again allowing the former practice to be adopted. NAWAC has therefore recommended that current cages should continue under the exceptional circumstances provisions of section 73, until the code is reviewed in 2009, when NAWAC will, at that time, consider New Zealand and international research on alternative systems including enriched cages; current good practice; available technology; public submissions; international practices and trends; and the feasibility, practicality and economic effects of any change.

In an earlier draft of this code NAWAC proposed recommending that current cages should be phased out by 1 January 2023, with the proviso that this would be subject to review and confirmation by 1 January 2008, when NAWAC would consider the results of any new research.

NAWAC subsequently recognised the difficulties in setting minimum standards beyond a ten year timeframe with regard to:

- what scientific research may establish during the intervening years in relation to the issue being considered;
- the new practices/technologies that may be developed during the intervening years in relation to the issue being considered;
- future external influences, both national and international, which might impede, or accelerate, a change;
- likely economic trends and what impact they might have on the ability for change to occur with regard to the issue being considered; and
- changes in societal values.

NAWAC therefore acknowledged that, after taking all of the above factors into account, it could not with any reasonable certainty set a date of 2023 for the phase out of current cages, until such time as it could be shown that, in comparison to current cage systems, alternative systems in the context of supplying New Zealand's ongoing egg consumption needs, would consistently provide better welfare outcomes for birds and be economically viable. NAWAC believes the following approach, which it is recommending to you, to be fair and reasonable, given the present state of available knowledge.

That approach is:

- to require all cages to provide a minimum space requirement of 450 sq.cm/bird from the commencement of the code
- to require all new cages built after the commencement of the code to provide 550 sq.cm/bird
- to require all cages existing prior to the commencement of this code to provide 500 sq.cm from 1 January 2008
- to require all cages from 1 January 2014 to provide 550 sq.cm/bird
- to signal to the industry that, based on current knowledge, NAWAC would ideally like current cages to be eventually phased out
- that NAWAC will review all research in 2009 and then provide a definitive recommendation on whether current cages should be phased out.

NAWAC believes this provides the layer hen industry with certainty in the short term, and identifies research priorities and clearly signals NAWAC's intent for the long term.

6.8 In summary, NAWAC has clarified its comments about cages, to make it clear that it thinks current cages should be phased out. It remains of the opinion that current cages do not fully comply with Section 10 of the Act.

7. *Free Range Stocking Densities*

- 7.1 *The EPF are of the opinion that a minimum land area requirement (i.e. 1 bird/11 sq.m) is reinstated but that the qualitative minimum standards as recommended by NAWAC are retained.*
- 7.2 Further information was supplied by the EPF to support its position, which was subsequently considered by NAWAC.

NAWAC Response

- 7.3 NAWAC acknowledges that the industry has generally complied with the minimum stocking density as recommended in the deemed code (which the new code of welfare will replace), and acknowledges that there is industry support for this.
- 7.4 While NAWAC acknowledges the concerns that the EPF has raised about the possible outcome of the lack of a minimum stocking density, NAWAC reaffirms the reasons for not recommending a minimum stocking density for the outdoor range of free range systems, and reiterates that free range producers will still have to comply with the other minimum standards. Failure to do so is likely to result in welfare compromises which may lead to prosecution under the Act.
- 7.5 NAWAC disagrees with the EPF's claim that it has consulted more extensively amongst international experts, than has NAWAC.
- 7.6 NAWAC disagrees that it 'has not provided the science to support their assertion'. On the contrary, NAWAC is not aware of any science that actually supports stipulating a minimum stocking density and in fact notes that the EPF has not provided any science to support their assertion. In fact, in two of the communications provided to NAWAC by EPF, the following statements are made:

'The current UK industry practice of 1000 birds per m² (10 m²/bird) is steeped in history and compromise' L. Aucott, May 2004.

'Although no definitive piece of research gives a stated optimum space per bird on the range experience has shown that even with 1000 birds/ha density, disease and welfare problems can still occur.'
L. Aucott, May 2004.

'Despite this lack of science we have plenty evidence of experience that shows increasing the density on the range can lead to health and welfare problems with the flock. Some would even suggest a much greater space is needed when methods such as trees are used to encourage ranging, because a much greater proportion of the birds

use the outdoor area, and it very quickly can become sparse of vegetation.’ L. Aucott, May 2004

‘... there is very little research which can be cited to provide scientific evidence of ideal or sub-optimal densities.’ and ‘..the figure of 1000 birds per hectare... which was set by the EU Council Directive, is based on little more than a compromise between the welfare societies and poultry industry back in 1985 . B Hughes, May 2004.

This clearly shows the paucity of scientific research in this area. NAWAC acknowledges that a maximum stocking rate of 1000 hens/ha may be common practice in New Zealand, and agrees that common practice should be taken into account when recommending minimum standards. However, it remains firmly of the opinion that there are many variables such as soil type, geographic location etc which will influence stocking density. This is clearly supported by statements made by the EPF, on behalf of the EPF or in information supplied by the EPF, that maximum stocking densities for free range birds are a ‘*compromise*’; based on ‘*very little research*’; *some would even suggest a much greater space is needed*’; ‘*in addition to nitrogen deposition... how free-draining the soil and subsoil are, is another factor to be taken into account*’; and ‘*soils based on sand or gravels are likely to be more forgiving than are heavy clay soils*’. Therefore NAWAC disagrees that a maximum stocking density should be set.

7.7 NAWAC wishes to make several further points:

- 7.7.1 It seems inconsistent to argue as the EPF has done that ‘*Animal behavioural scientists agree that free-range birds need to be encouraged to range*’ and that ‘*...a discouragement to range will lead to poor health and welfare outcomes.*’ By setting a minimum outdoor area for free range systems on the basis of animal welfare and animal health, it is effectively implying that there is insufficient space for birds in barns both to move around and to maintain good health and welfare.
- 7.7.2 Hens on an outdoor range are no different to pastoral species such as sheep or cattle, where stocking rates cannot be prescribed as they vary depending on the geographical location, soil type, climate, topography, age and type of animal etc.
- 7.7.3 It is erroneous to infer that international standards for minimum stocking densities are in agreement. Stocking densities may range from 375 birds/ha (Freedom Foods UK), to 1500 birds/ha in the Australian Model Code of Practice to 2500 birds/ha (or 1 hen/4 sq.m) in Europe (EU Directive 1999/74/EC and the European Egg Marketing Regulations, EEC 1907/90). On the other hand, NAWAC notes the International Egg Commission’s publication *The Welfare of Laying Hens Statement and Recommended*

Standards, December 2003, does not prescribe a minimum outdoor space, however similar statements regarding rotation, presence of vegetation, shelter etc are made, as NAWAC has recommended in the code of welfare. Similarly, neither the UK *Welfare of Farmed Animals (England) (Amendment) Regulations 2002* or UK *Code of Recommendations for the Welfare of Livestock: Laying Hens* state a minimum stocking area for free range systems, although the code of recommendations notes for labeling purposes, free range eggs must be produced in establishments which comply with EU Directive 1999/74/EC. This directive requires a maximum stocking density of 2500 hens/ha or one hen per 4 sq.m.

7.7.4 NAWAC notes that available outdoor space is generally highly underused, with not all hens using the outdoor space at once. As B. Hughes notes in the same communication noted above, ‘...on average only say, 10% of the flock is ever out of the house at the same time..’ which may depend on a number of variables such as time of day, stocking density, flock size and husbandry conditions.

7.8 The EPF has supplied statements that by not stating a minimum outdoor range this will lead to ‘...*less scrupulous producers to reduce the amount of range available*’ and an implication that this could lead to a loss of consumer trust and reduction of sales. In addition, the EPF has previously indicated that the Commerce Commission has been waiting for a definition of free range, so that it could deal with complaints relating to perceived breaches of the Fair Trading Act where producers claiming to be free-range have been found in fact to manage their birds on extremely small crowded patches of ground, devoid of grass or vegetation cover. NAWAC reiterates that its legislated role is to recommend and advise on animal welfare issues and, as such, does not encompass the defining of production system classifications for industry labeling purposes.

NAWAC suggests that if precise minimum stocking densities are seen as a marketing issue for consumers and if the industry is concerned that consumers might be misled when purchasing free range eggs, it should consider defining its own standard with appropriate labeling, in much the same way as the Royal New Zealand SPCA accreditation scheme or the British Egg Industry Councils’ *Lion Code of Practice*.

8. Body Condition Scoring

8.1 *The EPF believe that this is a flawed technique and that there is no substantial research on this area. The EPF has previously been critical, noting that it is impractical and subjective, and that there are other more reliable indicators of bird condition.*

NAWAC Response

- 8.2** NAWAC still remains concerned that despite the strong genetic selection which is practised in the poultry industry, there is still a range of liveweights. The purpose of developing a body condition scoring system would be to identify birds that are emaciated, and such a scoring system could have just two categories – emaciated and not emaciated.
- 8.3** NAWAC agrees that the only research to date on this area is a small trial carried out in New Zealand.
- 8.4** NAWAC would therefore like to see further research carried out and has decided to delete the recommended best practice, but leave the *Note*, in which it requests that further research be carried out, in the first two years following the issue of the code.

With regard to the submission of 27 May 2004 (see attached Appendix I)

The following are NAWAC's responses.

1. **Page 11 (1.9) Glossary**
Definition has been amended
2. **Page 14 Legal obligations**
This section does not apply to moving birds from one production system to another.
3. **Pages 15-16 Minimum Standard 1**
The section in the Layer Hen Code has been rearranged to match a similar section in the code of welfare for broiler chickens.
4. **Page 17 All water should be tested for mineral and microbiological contamination....**
NAWAC disagrees. This code applies to any operation offering eggs for sale. Therefore it applies to a range of operations from small numbers of hens to many thousands. NAWAC believes that while it may be a good practice, it would be impractical to recommend this as a minimum standard or a recommended best practice. NAWAC believes that the minimum standard 'All birds must have continuous access to water that is palatable and not harmful to health.' is sufficient and covers this suggestion.
5. **Page 22 All production systems are subject to continual review....**
It was NAWAC's intention to repeat this paragraph in both sections.
6. **Page 22 and 23 Minimum standard 5 Cage systems**
NAWAC has amended Minimum standard 5(i) (iii).
7. **Page 23 Recommended best practice The maximum number of cage tiers per walkway should be limited to four.**
NAWAC agrees and has deleted the recommended best practice because minimum standard 16 requires that a detailed inspection of each flock must be undertaken daily, and therefore it is incumbent on producers to have systems where this can be carried out, which may mean the use of mechanical equipment e.g. scissor lifts, in order to inspect all birds.
8. **Page 24 Recommended best practice To facilitate inspection, installation and de-population of hens... a space of 50 cm between the building floor and the bottom tier of cages.**
NAWAC agrees and has removed the recommended best practice, for the same reason as above.

- 9. Pages 24 and 26 Recommended best practice. Birds should have continuous access to appropriate forms of environmental enrichment.**
 NAWAC recognises that scientific evaluation of environmental enrichment for both caged layers and non-cage layers has been experimental to date, and that further research especially in 'on-farm' situations needs to be carried out. This recommended best practice has therefore been deleted. NAWAC however recommends that further research should be carried out in this area.
- 10. Page 26 Recommended best practice. Replacement pullets for free range and barn production should be reared under the system under which they will eventually lay.**
 NAWAC recognises that rearing facilities may rear replacements for both cage and non cage systems. NAWAC agrees that the recommended best practice should be amended to the wording used in the draft dated 5 June 2002.
- 11. Page 28 Floor rearing on litter**
 This sentence has been deleted, since it is incorrect.
- 12. Page 29 Minimum standard 7 Stocking densities A and B**
 NAWAC agrees and the minimum standard has been amended.
- 13. Page 33 Minimum standard 10 Moulting Inducement**
 NAWAC remains concerned about forced moulting that involves the withholding of food and water. NAWAC disagrees that the removal of birds from one production system to another is synonymous with forced moulting, although recognises that this is likely to be a stressful situation. NAWAC remains of the opinion that forced moulting should only be carried out when replacement pullets are not available. As stated in its previous report, this would be an exceptional event and would only occur in cases of disease outbreaks or management failures, either overseas (from where genetic material is imported) or in New Zealand hatcheries, resulting in reduced numbers of replacement birds. Such an occurrence is possible if for example, avian influenza spread to the one of the limited number of countries from which New Zealand sources genetic material for breeder flocks. Such a situation could potentially cause considerable economic hardship for producers and also result in an interrupted supply of eggs. However these events would be exceptional occurrences and therefore, forced moulting will be a rare event in the New Zealand industry. NAWAC has recommended rigorous minimum standards in those instances where forced moulting is carried out.
- The EPF requested that Minimum standard 10(f) be amended to 80 weeks, since 'layer hens kept commercially remain in lay well beyond 70 weeks of age'. On the basis of comment made in the review carried out by N. G Gregory on moulting both within New Zealand and in other countries, NAWAC has amended the standard to 74 weeks.
- 14. Page 35 Introduction**
 NAWAC agrees with this amendment.

Appendix I

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27 May 2004

Dr Wayne Ricketts
NAWAC Project Manager

Re: **Final Recommended Draft – Animal Welfare
(Layer Hens) Code of Welfare 2004 (19 April 2004)**

Dear Wayne,

The Executive Committee of the Egg Producers Federation met on 12th May 2004, to consider the Draft, and decided to raise 4 matters of concern directly with the Minister, but sought to resolve a number of "minor" matters directly with NAWAC.

During our discussions with you, since the 12th May, we have identified some 15 issues in the Recommended Code that we believe need amendment.

Some of these have been raised with NAWAC previously, whilst the remainder appear for the first time in the 19th April Draft.

Using the 19th April Draft as a reference, these matters are as follows:

1. Page 11 (1.9) Glossary

Cage System:

We Recommend:

Change of wording – in the 1st sentence to read
Cage or cage systems which provide up to 550 sq.cm or more per bird.

2. Page 14 Legal Obligations

(3) (b) We note your verbal agreement to obtain legal advice on the retention of this clause, which in its present form may preclude the movement of layer hens, from one production system to another.

3. Pages 15-16 Minimum Standard (MS) 1. Hatchery Management

There are only 2 hatcheries in New Zealand both of which supply Day old chicks for layer and broiler producers.

The MS and Introduction for the Broiler Code differs from the MS for the Layer Code, and we believe that it is essential that both codes have the same wording to provide a consistent outcome.

Please refer to **Appendix 1** which sets out the current Broiler Code Minimum Standard 1 with your changes highlighted.

Our Recommendation

As it may prove to be difficult to amend the Gazetted Broiler Code our recommendation is that the Broiler Code MS (Hatchery Management) should be used in the Layer Code.

4. **Page 17 All Water Should be Tested for mineral and microbiological contamination.....**

Recommendation:

That given the importance of water quality to the welfare of layer hens (possible infection and disease) that this paragraph be given the status of a Recommended Best Practice.

5. **Page 22 4th Para – All production systems are subject to continual review.....**

We note that this paragraph is repeated at the foot of Page 24. Is it your intention to use the same para in the introduction to both cage and non-cage systems?

6. **Page 22 MS 5 (C) – Cage Systems**

You have asked for clarification.

This was originally included to provide for the phasing out (or upgrading) of the "older style" 3 bird cages that presently provide a door which whilst opening to the full available height of the cage, has an opening width only covering part of the cage front.

This may have the potential to restrict the placing or removal of layer hens.

Reference to MS5 I (iii) (on page 23) will indicate that as from 1 January 2008 this type of cage must be modified or phased out.

7. **Page 23 MS 5 (I) (iii) – Cage Systems**

Although this wording was approved by the Industry and has remained un-changed since draft No 4 (October 2001), there is concern that some new cages installed in the last 2 years, may appear to have a smaller door size.

It is our opinion that whilst the door complies with the MS, it could be the subject of criticism from those more familiar with the fully opening doors of other cage manufacturers.

Because it is the opening width that is most important in moving hens into, and out of cages, we would ask that you consider amending the wording of MS 5 (I) (iii) as follows:

Recommendation:

The total space of bird cage above the feed trough shall act as a doorway, and shall provide an opening covering the full width of the cage, and a height that enables hens to be placed or removed from the cage without causing injury or undue stress.

8. **Page 23 RBP – The Maximum number of cage tiers per walkway should be limited to four.**

We understand that NAWAC is concerned about the ability of farmers to effectively monitor and/or examine layers in cages over 4 tiers high.

There are a small number of producers, who farm birds in cages over 4 tiers - up to 8 tiers high without intermediate mezzanine/walkways.

They state that this gives unobstructed access, and enables fresh air to be more effectively provided to all birds. The shed design eliminates the need for large fans to draw air past the birds, as the building provides a chimney effect and draws air in at the base and out the ridge vents. The reduction in energy cost is significant.

These producers use "cherry pickers" and scissor lifts to comply with MS16A (Carry out daily inspections) and maintain that this method is highly effective in both inspection and placing and removing birds.

There are a number of significantly different systems and configurations available to all cage farmers and we are of the opinion, that provided the producer complies with the appropriate MS (daily inspection), the choice of system is a matter for the individual.

Recommendation:

That this clause be removed as a R.B.P.

9. **Page 24 1st para R.B.P. To facilitate inspection, installation and depopulation of hens a space of at least 50 cm between the building floor and the bottom tier of cages.**

As far as we can ascertain, no commercial systems in New Zealand meet this criteria.

We understand the reason for the insertion of this RBP was (as for 8) for ease of inspection – in the bottom row of cages.

This will merely have the effect of making it more difficult to inspect the top row.

Recommendation

We ask that this clause be removed, as an R.B.P. as it does not enhance bird welfare and may unfairly restrict the design and installation of production systems.

10. Page 24 R.B.P. Birds should have continuous access to appropriate forms of environmental enrichment.

This clause has been questioned on several occasions.

What are appropriate forms of environmental enrichment?

We see little point in retaining the R.B.P. unless it is clarified.
This clause also appears on Page 26 as an R.B.P. for non-cage systems.

11. Page 26 R.B.P. Replacement pullets for free-range and barn production systems should be reared under the system under which they will eventually lay.

The intention of this RBP in relation to free-range pullets is unclear. Is it intended that free-range replacement pullets should also be reared on free-range, and if so, at what age should the birds be introduced to free-range.

The wording that was used in the Draft 5th June 2002 may be appropriate.

Recommendation:

That the following words be added to the R.B.P.
If producers choose to introduce pullets to a range area from 7 weeks of age, then the outdoor area provided should meet the specifications of Minimum Standards Nos 6 and 7.

12. Page 28 – Floor Rearing on Litter

The introduction states that “less than 4% of birds are reared each year using this system”.

This figure first appeared in the NAWAC 17 May 2003 Revision of the Code, and was correct at that time.

As a result of the closure of approximately 40 broiler sheds by a major company, some 4 years ago, 2 major operators have commenced rearing replacement hens using a number of empty sheds.

It is claimed that some 17% of the total New Zealand flock i.e. approximately 544,000 birds are now reared annually on litter on the floor by 4 operators and on supplied to farmers to produce eggs in cages, barns and free-range.

You may wish to modify the 4% or delete the reference altogether.

These comments are made as they have a bearing on clause 13 which follows.

13. Page 29 – MS 7 Stocking Densities A and B

On a number of occasions we have questioned the reduction in stocking densities for birds aged 7 to 18 weeks of age.

The figures used for birds reared on litter up to and including the Code released for Public Consultation (July 2002) were for 14 birds per M² reared on litter.

2) One of the major pullet rearers has provided details. (*see Appendix*)

We endorse the comments made.

Layer pullets at 16 weeks weighing 1.32 kg each are therefore housed at a density of 21.0 kg m² (55% of the allowable broiler density.)

The sheds in which the broilers and layers are reared are identical in every respect.

It would be inconsistent if the density standards were different.

Recommendation:

That Minimum Standard No 7 (Stocking Densities) be amended to allow 14 birds per sq.m, for birds aged between 7 and 18 weeks of age in Categories A and B.

14. **Page 33 MS10 Moulting Inducement**

On a number of occasions we have asked that there be some flexibility given to producers who may require to moult part or all of a particular flock of laying birds.

A significant number of smaller free-range producers and a few smaller cage producers, routinely moult layers purchased from other farmers at end of lay, and after moulting continue to produce eggs for 4-7 months from these birds.

The act of removing birds from cages, transporting them to a new location, and in the case of a free-range operation, a totally new environment, places considerable stress upon the bird, and this combined with the time taken for each bird to locate the new food and water source and compete with unfamiliar birds, causes a total cessation of production, and is sufficient to induce a moult.

Page 12 of the NAWAC report to the Minister states

“NAWAC recognises that some free-range producers may source their replacement birds as end-of lay caged layers. Removal of these birds from their cages, transportation and the placement on the property in free-range conditions could be a stressful situation for these birds and could cause the birds to go into a moult. (NAWAC does not consider this to be a forced moult, and believes that provided adequate precautions as set out in this Code, are in place, this practice should be permitted to continue.”

The statement that “NAWAC” does not consider this to be a forced moult, is difficult to accept.

The stress levels suffered by a bird removed from a cage and transported to another location are surely greater than those of a bird remaining in a cage in which it has spent its entire laying life with familiar food and water sources, and established pecking order and a controlled environment.

There are documented moulting procedures which cause low stress levels, and when applied to birds in place, in cages, result in mild stress levels.

Two of these procedures for force moulting are quoted by Neville Gregory quotes in his paper entitled

Moulting Hens – An Interpretative Review

Table 1	Quotes a moulting procedure requiring food and water withdrawal for one day and
Table 2	Sets out a programme involving no food or water withdrawal whatsoever.

Both of these he quotes as claiming to be mild forms of induced moulting.

Method 1 limits feed intake to about 15% of the birds appetite for 14 days and

Method 2 limits intake to about 30% of the birds appetite for about 28 days.

We again request that moulting be permitted subject of course to the existing clauses B to F in MS10 being complied with.

Recommendation:

That Clause A of MS10 be removed.

Page 33 Introduction

Recommendation:

That the introduction be amended to read

“Some methods of Force Moulting may cause severe physiological stress which can result in the death of some birds.”

Page 33 MS 10 Clause F

As birds today perform so well, layer hens kept commercially, remain in lay well beyond 70 weeks of age.

Recommendation:

That Clause F be amended to read moult inducement must not occur on birds of more than 80 weeks of age.

15. Page 35 – Introduction

Point of Harvest – should be changed to end of lay.

We look forward to your response to our further submissions, once NAWAC have had the opportunity to consider them.

Should there be any additional information you require please contact me.

Yours sincerely

Noel Smith
for the Egg Producers Federation (of NZ)

Appendix 1

1. Management of Broiler Chickens

1.1 Hatchery Management

Introduction

The key issues in hatchery management which affect the welfare of newly hatched chicks include cleaning and hygiene procedures, promptness of removing chicks after hatching, grading of day-old chicks, destruction of cull chicks and unhatched eggs, and holding room conditions.

The time interval from first chicks hatching to removal of chicks from the hatcher should be monitored. This is to ensure that chicks spend a minimum of time (not exceeding 18 hours) in the hatcher prior to removal from the hatching trays. (PIANZ Note: this has come from Recommended best practice with some changes).

The methods used for handling the chicks must be humane. Hatching trays with live chicks should be moved smoothly and levelly and precautions taken to prevent chicks falling onto the floor. When chicks are being sexed or handled individually their bodies should be supported, as distinct from lifting the chicks by head or wing alone.

Instantaneous fragmentation units should be routinely maintained and serviced for adequate and efficient functioning. Where used, Care should be taken not to overload the gassing chambers. In the case of equipment failure emergency euthanasia of individual chicks can be performed by neck dislocation.

Minimum Standard No. 1 – Hatchery Management

- (a) Holding room conditions for newly hatched chicks must provide for control of temperature and airflow so as to protect the welfare of the chicks.
- (b) All hatcheries must have a documented cleaning, sanitising and hygiene programme.
- (c) Euthanasia protocols must be documented and followed at all times.
- (d) All staff carrying out euthanasia must be trained and competent in the proper use of the relevant protocols.
- (e) All unhatched eggs at the time of day-old chick removal must be destroyed by instantaneous fragmentation.
- (f) To ensure euthanasia is achieved Cull or surplus chicks must be euthanased by instantaneous fragmentation or gassing with at least 70% CO₂ in air, or a mixture of 70% CO₂ and 30% argon,]
- (g) With gas euthanasia methods, smothering before the loss of consciousness must

not be allowed to occur.

- (h) Where CO₂ is used it must be delivered as a gas rather than a liquid into the chamber that is used for euthanasing the chicks.
 - (i) **Where** a gas system is used for euthanasing the chicks, the chicks must not be removed from the gas unit until they are either dead or irreversibly unconscious.
 - (j) Instantaneous fragmentation equipment must be designed, operated and maintained to ensure instantaneous destruction of eggs or chicks.
 - (k) Instantaneous fragmentation units and gas chambers must not be overloaded.
- All equipment used for euthanasia must be monitored when it is being used to euthanase the chicks and any problems rectified immediately.

Recommended Best Practice

Gas units should contain at least 70% CO₂ before chicks are introduced. They should also be designed to allow continual replenishment of CO₂, to maintain the correct gas levels. CO₂ should also be heated to room temperature before it enters the gas unit.

Appendix 2

Floor Rearing Density for Layer Chicks

The Minimum Standard for rearing density in the new Animal Welfare (Layer Hens) Welfare Code is stated as 10 birds per m² for 7-18 weeks. This is a reduction from 10-14 birds per m² in the current code.

Birds/m ²	Weight/Bird @ 7 weeks *	Weight/m ² @ 7 weeks *	Weight/Bird @ 18 weeks	Weight/m ² @ 18 weeks
10	580	5.8 kg	1.5	15 kg
14	580	8.12 kg	1.5	21 kg
Broilers (Standard)		(max) 38 kg		(max) 38 kg

* Hyline Brown Standards

We have reared large numbers of birds to 16 weeks of age @ 14 birds per m² for some years. These sheds are to broiler specification.

We routinely sample weigh these flocks and achieve breed standards without any problem and uniformity of 90% + (within + and – 10% of the average weight) is frequently achieved. This is well within breeder recommendations of 80% within + and – 10% of the average weight.

A far more rational approach to the above would be to have a maximum weight per m² assuming all other welfare parameters are in order. For example –21 kg per m².

This would allow larger numbers to be reared to 7 weeks (currently the standard means that in broiler terms the shed is only 15% full at 7 weeks and only 28% of the density at 18 weeks at the old standard).

The effect at reducing the maximum birds per m² from 14 to 10 increases our shed cost by 29%. If in these sheds we are not permitted to rear greater numbers to 7 weeks this further increases our shedding cost.

The NAWAC Welfare Code submitted to the Minister also states that only 4% of layer birds are reared on the floor.

This is no longer correct. We rear between 6%-8% ourselves. Another operator rears another 5%, another barn operation rears another 2% and a further rearer rears another 4%. This gives 17% without including the numerous free-range operators who rear their own. This would put the floor-rearing total at around 20% of the national chicks placed annually.

We rear birds either to 7 weeks or 16 weeks. At 16 weeks the target is 1.32 kg. The new Minimum Standard means that in broiler terms we have the shed only 35% full.

While layer birds cannot be equated to meat chicken exactly, because of the difference in their age and nature, it is difficult to see why there should be such a discrepancy between the birds.

This change represents a serious escalation in cost to people rearing birds on the floor and also to the customers receiving these birds using all three operating systems; cage, barn and free-range.