

Summary of public submissions Animal Welfare (Broiler Chickens) Code of Welfare 2010

Overall there were 41 submissions and 2 late submissions. Of the 41 submissions, 16 (#s 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 19, 22, 23, 31, 32) were form letters of the same type, although the wording was slightly changed in some cases and additional information provided in others. Submission #17 and #18, although independent, had the same content and came from the same address. Submissions #28 and #29 also share the same content. Submission #34 and #35 are also identical and have been received from two members of the same company.

Only three submissions responded to the 9 questions by NAWAC (comments listed at the end of this document).

The majority of submissions support revision of the Code and appreciate the opportunity to comment on the current draft Code.

Main issues raised included:

- Stocking densities
- Breeding of genetically 'flawed' birds leading to animal suffering due to their fast growth rate and resultant leg disorders and heart problems.
- Treatment of birds during catching, loading and transport.
- Providing conditions for behavioural needs to be met.

Section of the Code	Submission Number	Submission content	NAWAC Comments
General comments			
	2	Is in support of improving standards for chickens bred for human consumption. There must be a way to breed chickens from healthy stock allowing birds a longer happier life.	Noted
	3	Is in favour of strengthening the CoW for Broiler Chickens.	Noted
	4,5,6,8,9,10,11,12,14,15,17,18,19,20,22,23,31	Improve standards so the industry can no longer treat birds cruelly.	Noted
	7	Has concerns about intensive chicken farming in NZ. We do not benefit from cheap and dirty, it is a false economy and very poor nutrition.	Noted
	8,11,17,18	Have listed facts about New Zealand broilers and find them shameful	Noted
	10	We are allowing the chicken industry to mistreat the chickens they farm behind closed doors.	Noted
	14	Is appalled by the way our factory farmed animals are treated and by the fact that our laws are inadequate to protect these animals from cruelty and neglect. Is disgusted and ashamed by the way we as a nation currently allow these animals to be treated.	Noted
	15	Is disgusted our country allows such cruel systems of farming.	Noted
	16	Is delighted to have an opportunity to make a submission on this important legislation.	Noted
	17,18	Thinks it is appalling how chicken industry treats these animals.	Noted
	19	Wants to stop eating chicken after reading what some of them have to go through and how they suffer.	Noted
	20	Would like to see an end to the suffering of mass production of farmed animals, particularly chicken. Standards in the chicken industry are very poor and chickens are treated very cruelly without any compassion and solely for financial greed. They certainly do not live anywhere near a normal and natural life. The present environment certainly does not create a healthy bird which in turn cannot be good for our health. Is certain that many consumers would choose chicken that was raised in a healthier environment over what is currently offered in general supermarkets.	Noted
	24	Chickens slaughtered for broiler in New Zealand experience crowded confinement, unnatural lighting regimes, poor air quality, stressful handling and transportation, and inadequate stunning and slaughter procedures. Selectively bred for rapid growth, broiler chickens are prone to a variety of skeletal and metabolic disorders that can cause suffering, pain, and death. Broiler breeders, the parent stock of chickens raised for broiler, are subjected to severe feed restriction, and males may undergo painful toe and beak amputations, mutilations performed without pain relief.	Noted

		<p>In order for the poultry industry to meet animal welfare requirements for broiler chickens farmed indoors, the industry needs to be totally restructured.</p> <p>RECOMMENDED ADDITIONS TO THE CODE</p> <p><i>Indicators of Welfare Friendly Broiler Chicken Farming</i></p> <p>At a minimum, there are five complimentary indicators (details for each provided in submission) of welfare friendly broiler chicken farming (reference provided):</p> <ol style="list-style-type: none"> 1. Slower Growing Breed 2. Access to the Outdoors/Free Range 3. Environmental Enrichment 4. Low Stocking Densities 5. Shorter transport and waiting times at slaughter <p>At the very least a significant reduction in the broilers' growth rate and in the stocking density in chicken houses is urgently required.</p> <p>References made to sections of the AWA 1999 (see submission for detail).</p> <p>The draft Code of Welfare only goes some way towards complying with these provisions of the Animal Welfare Act 1999, and further research is needed to resolve many of the welfare issues identified in this submission.</p> <p>Gives list of further research needed (see submission for detail)</p>	Noted
	25	<p>We thank NAWAC for the opportunity to make this submission. We believe that there is a significant need for the draft Code to provide more stringent minimum standards to protect the welfare of broiler chickens.</p> <p>We would also like to see the format of future Codes modified so that the wording of minimum standards are meaningful and analogous to the wording of that used in the AWA as far as this is possible. The reason these Codes are written is to ensure the welfare of the animals in question, not to provide "ideas" as to how this might be achieved.</p> <p>We would welcome the opportunity to make a further submission on NAWAC's revised draft of the Code, following NAWAC's consideration of the public submissions.</p> <p>Although not directly covered by this Code the following factors need to be urgently addressed by the poultry industry:</p> <ol style="list-style-type: none"> I. Genetic selection should take place that will produce a broiler with better health features. Broilers should be bred for stronger bones and healthier hearts. II. Broilers should be allowed to grow more slowly towards their slaughter weight. Efforts to produce broilers that grow to slaughter weight in the shortest possible time should be stopped. The type and amount of food should be controlled to slow growth to a more normal level. III. Efforts should be made to reduce the incidence of feather pecking. 	<p>Noted</p> <p>Disagree the code format follows the Act requirements, including MS and RBP's</p> <p>Noted, though no further consultation considered necessary</p> <p>Noted, I and II relevant to Broiler Breeders code in preparation. Though statements included in Section 1.3 and 5</p> <p>Noted, though this is an issue for layer hens not meat chickens</p>
	26	Several currently listed minimum standards outlined in the Draft Code do not sufficiently	Noted

		meet the requirements of the AWA 1999. Is expert on chicken behaviour and has published two books on chickens (references for books and other material provided in submission).	
	27	<p>I believe that the review of the Code of Welfare for chickens is an opportunity to make vital changes to the standards which govern the living conditions of chickens in New Zealand. The current draft shows an awareness of the current problems in the broiler chicken industry in regard to bird welfare, but it does not go far enough to tighten the standards which could begin to battle these systemic issues.</p> <p>The new Code of Welfare for broiler chickens should ensure that birds in our poultry industry <i>do not suffer</i>, not that they suffer slightly less.</p> <p>Hopes that the Committee will take strong and deliberate steps to create and enforce standards which substantially lessen the cruelty inflicted on broiler chickens in New Zealand by:</p> <ul style="list-style-type: none"> • drastically reducing stocking densities across the industry, and • acting quickly to halt the suffering and physical deformities caused to every broiler chicken in our country by the destructive selective breeding of broiler breeder companies. <p>It is encouraging to see <i>redacted</i> statement that the Animal Welfare Advisory Committee “recognises the important contribution that breeding makes to broiler welfare problems”. The sole goal of broiler breeder companies is to produce as much chicken meat as fast as possible for as little as possible. They have no interest in whether the live birds can breathe, move, or are in pain, as long as they put on weight and survive long enough to be killed. It would be absurd to put the onus on these companies to stop this cruel and deliberate practice without strict standards and monitoring by an independent authority whose only priority is animal welfare. In the same way the welfare of the 80 million broiler chickens who are raised and killed in our country every year is too much responsibility for those whose vested interest lies in the birds’ dead meat, and not in the welfare of the live birds.</p>	<p>Noted</p> <p>Noted and Broiler Breeders code in preparation.</p>
	28,29	Request that the standards governing the farming of broiler chickens be raised and brought into line with the intent of the AWA 1999, so that it is no longer possible for poultry farmers to intensively rear chickens under the cruel conditions which are permitted by the current Code and which causes unnecessary suffering and misery to millions of birds.	Noted
	30	Opposes the new draft Code’s relaxation of minimum standards imposed by the 2003 Code.	Noted
	32	It is great that CoW for Broiler Chickens is under review as it is our chance to make a positive change in the conditions for chickens across NZ.	Noted
	33	The single biggest factor affecting the welfare of broiler chickens is the fast-growing strain used. Modern broilers are genetic freaks; bred to grow so quickly that their legs cannot cope with their weight, and their hearts cannot cope with the strain. As a result, a huge proportion of chickens are visibly lame, and many die from a build up of fluid	Noted, relevant to Broiler Breeders code in preparation. Though statements included in Section 1.3 and 5

		(ascites). The only way to prevent these extremely painful events is to breed slower growing strains. The draft Code of Welfare is remiss in not regulating the breeds used.	
	34,38	Urgent action needs to be taken to immediately and greatly improve care and conditions of chickens in so-called 'farms' throughout New Zealand. A great reduction in numbers [of farms?](at least halving numbers immediately) would be a reasonable beginning with clear guidelines to further reduce numbers to no more than a fifth of current numbers and densities within 1 year maximum. While it is appreciated that there are businesses and livelihoods involved in this issue, cannot have respect for those who profit by inflicting terrible suffering nor ignore the appalling plight of, and extreme cruelty endured by, helpless and defenseless creatures. Producing significantly reduced numbers and selling at much higher prices must be the price - not the suffering of chickens. Greatly improved standards of care must be urgently required and enforced ensuring, <u>at the very minimum</u> , that our current welfare standards are met: The Animal Welfare Act 1999 (AWA) requires that animals must be able to express their normal behaviour. Battery farming makes a mockery of this.	Noted
	35	Thank NAWAC for the opportunity to provide feedback on the draft Code of Welfare. Have attached a list of current qualifications available for the Poultry industry. Once the Code has been finalised will be working with PIANZ to review these qualifications and related resources to ensure future training will enable the potential of the Code of Welfare to be maximised. Encourage NAWAC to contact them if NAWAC wishes to be involved in this process. Congratulate on the frequent mention of, throughout the draft Code of Welfare, of expectations regarding the training of employees and managers.	Noted Noted
	36	NZ's freedom from major poultry diseases makes it the best country in the world to grow poultry. New Zealand commercial meat chickens do not need, and are therefore not vaccinated against, a range of poultry diseases, as are their overseas counterparts. This leads to increased availability of energy for bone and muscle growth leading to better health and welfare outcomes. The reduced challenge of diseases also leads to less welfare issues and less need for therapeutic antibiotic treatments. This results in better welfare outcomes for New Zealand meat chickens that must be considered in reviewing welfare requirements under the draft Code of Welfare. Draws attention to research conducted in NZ showing that welfare of broilers in NZ is high by international comparison. Supports the outcomes-based approach as it allows industry to adapt to ever-changing technology and new science to address welfare needs.	Noted Noted
	37	The Animal Welfare Act 1999 (AWA) requires that animals must be allowed to express their normal behaviour and this is impossible under the current conditions allowed in New Zealand poultry farms.	Noted
	39	The Animal Welfare Act stipulates that farmed animals should be free to display normal patterns of behaviour, and the Draft Code for Broiler Chickens also uses this phrase several times. However the minimum standards proposed in the Codes are in serious	Noted

		violation of this requirement. The Code should put far tighter restrictions on the crowding of sheds, and require that birds have access to something like their natural environment – roosting boxes, dirt for scratching and bathing, sunlight and so on.	Noted
	40	Welcomes the opportunity to comment on the public draft Code of Welfare.	Noted
	41	The Code should have a pad burn compliance/monitoring section. There is no ongoing day to day method of monitoring if the birds are receiving adequate welfare. Given that good litter generally indicates good welfare, monitoring of pads at the processing plant would give feedback of which companies and which farmers are delivering good welfare for the chickens in their care. The EU Code has this and an allowance for good welfare companies to run higher numbers of chickens per square metre.	Disagree
Title			
	35	Support PIANZ's points, such as the renaming from 'Broiler Chickens' to 'Meat Chickens'.	Agree, change made
	36	Requests that the title of the Code of Welfare is changed and that " <i>broiler chickens</i> " is changed to " <i>meat chickens</i> ". The phrase " <i>broiler chicken</i> " is an old, and now redundant, industry term, and for the benefit of consumers and industry, we submit that the title " <i>meat chickens</i> " is a more accurate description of the bird described in the Code of Welfare.	Agree, change made
1. Introduction Section 1.1, page 5			
	30	This section fails to actually state the purpose of this Code. A clear statement of purpose would provide a very useful point of reference for the assessment of the adequacy of the draft.	Disagree
2. Stockmanship Introduction, page 7			
	36	Supports principles outlined in Introduction section and is totally committed in raising knowledge, skills, abilities and attitudes of stock handlers. Suggests the following comments are included in Introduction section: 'The meat chicken industry in New Zealand, as is overseas, is a vertically integrated industry. Meat chickens are owned by processing companies and the birds are raised by farmers on behalf of the owners, therefore both parties are responsible for ensuring the welfare needs of the meat chickens are met. Therefore meat chicken processing companies which formulate manufacture and supply feed and/or advisory services are responsible for ensuring the supplies or services support the welfare of the birds.'	Noted Disagree, this information is already in Section 1.2.
MS 1	24	Greater emphasis needs to be given to staff experience, training and the daily schedule. All staff should demonstrate full understanding of the welfare needs and basic biology of the chickens, and have shown that they are capable of safeguarding them under all foreseeable conditions before being given responsibility for a flock. A good flock-keeper	Disagree, though RBP added

		<p>will have a compassionate and humane attitude, will be able to anticipate and avoid many potential welfare problems, and have the ability to identify those that do occur and respond to them promptly.</p> <p>Staff, including those employed by contractors, should be given appropriate training. This requires the acquisition of specific stockmanship skills which may be developed on-farm, working with an experienced person, or by following a course offered by a suitable training provider. Staff should demonstrate competence and understanding before they are given responsibility for the chickens. Training should continue throughout the duration of employment, and suitable refresher courses should be undertaken regularly. Wherever possible, the training should be of a type which leads to formal recognition of competence. A training plan should be implemented to ensure that those working with broiler chickens recognise not only normal behaviour and good health, but also signs of illness or disease or impending health problems. If specialised tasks are to be performed, for example vaccination or humane culling, then specific training should be given.</p> <p>Alternatively, the services of a competent contractor using trained staff should be obtained. Staff should establish a methodical routine in completing the range of tasks involved in keeping chickens. As part of this they should be particularly vigilant in checking that systems are operating properly and chickens are behaving normally. This will enable staff to detect problems in their earliest stages and acquire a good understanding of the action to be taken if a problem is noticed. If the cause is not obvious, or if the flock-keeper's action is not effective, immediate veterinary or technical advice should be obtained.</p> <p>It is essential to ensure that enough time is available within the daily work routine for the chickens to be properly inspected and for any remedial action to be taken. Large flocks can be managed successfully, but in general the larger the size of unit, the greater the degree of skill and dedication needed to safeguard the welfare of the chickens.</p>	<p>Agree but already adequately covered</p>
	33	<p>Are in broad agreement with MS1. However we note with concern that there are no recognised qualifications under the National Qualifications Framework for agricultural workers managing broiler chicken husbandry. Therefore propose that the Agricultural Industry Training Organisation be required to develop and teach a National Certificate in Agriculture with strands in broiler husbandry at Level 2 or above. Such a qualification must include training in broiler welfare and how to raise broilers in such a way that their welfare is not compromised. Once this is in place the completion of this qualification should be compulsory for all those looking after broiler chickens.</p> <p>MS#1 should include the following additions:</p> <p>b) The Agriculture Industry Training Organisation, in conjunction with the industry, must have in place a recognised qualification in broiler husbandry to at least Level 2 under the National Qualifications Framework.</p> <p>c) The qualification described in b) must be available by the start of the academic year in 2012 in at least one institution in each Regional Authority area of New Zealand.</p> <p>d) This qualification described in b) must include broiler husbandry, and caring for the</p>	<p>Disagree, Poultry courses at Level 2, 3 and 4 are available at Agriculture ITO and include aspects of poultry meat production.</p> <p>Disagree</p> <p>Disagree</p> <p>Disagree</p>

		welfare of broilers, in its curriculum. e) From June 2012, all personnel working on broiler chicken farms must have completed the qualification described in b).	Disagree
	36	Supports MS.	Noted
Example indicators	36	Supports Example Indicators.	Noted
General information	35	Request reword second sentence on page 8 to read: Information on qualifications and accredited training providers is available from meat chicken companies, the Poultry Industry Association New Zealand, and Agriculture ITO.	Agree, information has been added.
3. Food and Water			
General comments	33	Feeding the modern broiler requires a balance between providing too much food and exacerbating lameness and ascites associated with the top heavy breeds used, or not feeding enough and having the broilers go hungry. This is a particular issue among breeder chickens. These show the same genetic tendency to massive growth as the broilers that are bred from them, but need to be kept lighter in order to breed. These birds are therefore severely restricted in their food intake.	Noted, relevant to Broiler Breeder Chickens code in development
Introduction, page 9	36	Proposes the following addition to the second paragraph of the Introduction section: Food quality and composition relevant to the age of the bird is a key factor in meat chicken welfare. Regular monitoring of food quality commencing at point of manufacture and on farm, water consumption and litter, will provide an early warning of sudden changes in the performance, health and condition of the meat chickens.	Agree, added to GI section.
	40	Suggest first paragraph, last sentence should be 'Requirements for the quality and composition of feed manufactured for broiler chickens...', since this requirement only applied to manufactured feed. Is there any reason why the reference to the Code of Practice in the current Code has been deleted from the end of this sentence?	Agree, change made. Noted, code of practice referred to in EI
MS2	21	c) Water supply could be available in every cage to ensure that chickens are getting their individual supply of water for the day. d) Chickens should not be euthanased immediately, as this is inhumane. They do not deserve to die when they still have the opportunity to live their lives to the fullest. Another solution is needed.	Noted, meat chickens not in cages. Disagree, allowing birds to suffer unnecessarily is inhumane
	24	This standard inadequately deals with the type of diet, the purpose of the diet and the manner in which the diet is consumed. The minimum indicators could read as follows: (a) Animals shall be fed a wholesome diet which is appropriate to their age and species and which is fed to them in sufficient quantity to maintain them in good health, to satisfy their nutritional needs and to promote a positive state of well-being. (b) No animals shall be provided with food or liquid in a manner, nor shall such food or liquid contain any substance, which may cause them unnecessary suffering or injury. (c) All animals shall have access to feed at intervals appropriate to their physiological needs (and, in any case, at least once a day) except where a	Disagree

		<p>veterinary surgeon acting in the exercise of their profession otherwise directs.</p> <p>(d) All animals shall either have access to a suitable water supply and be provided with an adequate supply of fresh drinking water each day or be able to satisfy their fluid intake needs by other means.</p> <p>(e) Feeding and watering equipment shall be designed, constructed, placed and maintained so that contamination of food and water and the harmful effects of competition between animals are minimised.</p> <p>(f) No other substance, with the exception of those given for therapeutic or prophylactic purposes or for the purpose of zootechnical treatment shall be administered to animals unless it has been demonstrated by scientific studies of animal welfare or established experience that the effect of that substance is not detrimental to the health or welfare of the animals.</p> <p>(g) All chickens should have daily access to feed. When introducing chickens to a new environment, staff should ensure that the chickens can find feed and water. To prevent chickens having access to stale or contaminated feed or water these should be replaced on a regular basis.</p> <p>(h) In intensively housed systems, the maximum distance which any bird should have to travel in a house to reach feed and water should not be more than four metres. However, in some situations, such as some outdoor production systems, it may be necessary for the chickens to travel more than four metres. In these situations, all chickens must be adequately cared for in terms of stocking density, feeding and drinking space to allow for such movements.</p> <p>(i) Sudden changes in the type, quantity and make-up of feed should be avoided. Any changes in diet should be introduced gradually.</p> <p>(j) Compounded feeds which have been prepared for other species should be avoided as certain substances can be toxic to chickens.</p> <p>(k) Feed should not be withheld for more than 12 hours before the chickens are slaughtered or delivered to a new farm. This period of 12 hours must be an inclusive period to include the catching, loading, transport loading and unloading time prior to slaughter. Prior to transport, water should be provided up to the start of the loading procedure</p> <p>(l) Water meters should be fitted to each house to enable daily monitoring of water usage. Daily records of water consumption provide an early warning of potential problems and a water meter is a necessary management tool.</p> <p>(m) Daily access to water throughout the period of lighting and a sufficient number of drinkers, well distributed and correctly adjusted, should be provided.</p>	
	25	<p>MS#2 should have the following additional clauses:</p> <p>(e) Daily inspections must be carried out to ensure that undue competition and resulting injuries are minimised, and any corrective action must be taken and documented as required. Deaths, cull numbers, and reasons where available, must be recorded. These</p>	Disagree, remain as EI

		records must be kept on site for a period of no less than 6 months for auditing purposes. (f) If the mortality level within a shed is in excess of 1% in a 24 hour period, an investigation must be undertaken to determine the cause and appropriate action taken to prevent any reoccurrence.	Disagree, remain as EI
	33	The proposal to phase out fast growing breeds will mean that this balancing act is no longer required. Therefore recommend no changes to MS 2, providing the proposed MS relating to genotype is adhered to.	Noted
	36	Supports MS#2 as outlined in draft.	Noted
Example indicators	33	Request that the Example Indicators be incorporated into the MS.	Disagree
	36	Supports Example Indicators.	Noted
	40	Could the last Example Indicator be a minimum standard? It seems a lot of the minimum standards in this Code have come directly from industry standards, and if this is one, then we believe it is worthy of minimum standard status.	Disagree, remain as EI
4. Shelter and Facilities			
Section 4.1, Range General comments	24	HIGHER WELFARE BROILER CHICKEN FARMING “Free Range” Systems In commercial free range broiler chicken systems, many chickens never leave the houses, making them ‘free-range’ in name only and suggesting that the environment provided is not preferred habitat. Many chickens do not come outside the houses at all or at best stay within the immediate environment of the houses. This suggests that many existing free range systems are not providing the outdoor environment that the chickens themselves want. In evaluating the welfare benefits of commercial free range systems a crucial first step is to establish whether increased ranging behaviour is associated with lower mortality and fewer downgraded carcasses. The main findings of a study were that chickens prefer ranging areas with trees, they avoid bright sun and that, within their paddocks, they either stay close to the house or they seek tree cover. These results have important implications for the design of free-range poultry systems and make it clear that tree cover is something that should be provided to encourage ranging. If commercial free range is to provide suitable outdoor habitat for chickens, thought needs to be given not just to the habitat available in summer but also to what is available in winter. Trees may assume even greater importance in winter than in summer as wind breaks and protection against wind and rain. (references provided)	Noted Agree, RBP added.
	25	The term “Free Range” needs to be defined more clearly in this Code, and definitive standards put in place to ensure compliance with any accredited free range scheme. The general public and consumers have the expectation, and rightly so, that products marked as “Free Range” carry with them a level of certainty that the welfare of the animals involved is higher than usual and is well maintained. For this reason we feel that terms such as “...must be of sufficient width...” are unhelpful	Disagree, not the purpose of this animal welfare code. The welfare of birds outdoors is covered by this code.

		when used in minimum standards and that a definite minimum size should be stipulated. Once again, the examples used as indicators should, we feel, be progressed to minimum standards.	Disagree
	30	The inclusion of free range broiler farms within the scope of the Code.	Noted
	36	Supports the inclusion in the Code of Minimum Standards for free range meat chicken farming which is a growing sector of the meat chicken industry.	Noted
MS3	24	<p>This standard only applies to free range systems. For free range systems, the facilities must provide access to an outdoor range and indoor shelter.</p> <ul style="list-style-type: none"> As a guide, chickens when either fully or reasonably feathered and depending on the growth rate, must have ready access through openings to the outdoor range during daylight hours for a minimum of 8 hours per day, taking into account the climatic conditions. Suggested size and spacing of openings is a minimum 35 cm high x 40 cm wide every 2 m per 1000 chickens. As a guide, stocking density in sheds/range should be approximately 14 chickens per sq metre (30kg/sq metre, depending on breed). Chickens must have access to shaded areas and shelter from rain, and windbreaks should be provided in exposed areas Chickens may be restricted from accessing the range during adverse weather or if there is a serious outbreak of disease. <p>The outdoor range should be sited and managed to avoid muddy or unsuitable conditions.</p> <ul style="list-style-type: none"> The range should be maintained to provide sufficient grassed area for chickens. Remedial action, if required, may include reducing stocking densities or implementing a rotational program for the flock. <p>Chickens should not be kept on land that is contaminated with poisonous plant material or chemicals which may cause health problems.</p>	Noted Disagree, MS and EI covers the key welfare requirements, though wording changes have been made.
	25	<p>MS#3 be re-worded to the following:</p> <p>(b) Each opening provided for birds to access the outside must be no smaller than 450mm high and 1 metre wide per 1000 birds and enable all birds to freely move to and from the range without the risk of smothering or injury.</p> <p>In free range systems it is acknowledged that birds may not make full use of the space afforded to them if they feel at threat from attack by predators, or overexposed to the weather. For this reason we believe that any free range system should have sufficient and proper shelter and shade provided, and maintained. MS#3 should have the following additional clause added:</p> <p>(e) Shelter and shade (artificial or natural) must be provided and maintained.</p>	Disagree Disagree, but RBP added.
	26	MS#3 should require that free range birds have adequate shelter from wind, rain and sun when ranging outside the shed. Otherwise these birds are prohibited from expressing	Disagree, but RBP added.

		<p>normal behaviour. In nature they would typically find trees, shrubs or other modes of coverage. The provision of protection from normal climactic conditions when ranging outside is essential and should be specifically included as a minimum standard.</p> <p>Free-range chicks have access to an outside environment and can, in theory, forage and dust-bathe within a restricted area. In practice, however, many chicks in these systems remain inside, overwhelmed by the sheer number of flock mates encountered when trying to enter or leave sheds. Only smaller flocks really enable chickens to behave as they would naturally, because they can recognize individual flock mates and maintain peck orders for safe social interactions. Birds raised for commercial purposes, because of the numbers involved, are in a constant state of trying to establish a hierarchy but never achieving it.</p> <p>MS#3 should require that free range birds are maintained in small flocks.</p> <p>MS#3(b) should require that inside/outside portals are numerous, as well as wide enough for birds to see what is happening on either side of the portal.</p>	<p>Noted</p> <p>Disagree Disagree</p>
	30	<p>Clear definition of some parameters is required here. Many people buy free range farm produce specifically on animal welfare grounds, and are prepared to pay more for it; this Code provides a natural context in which to clearly define and prescribe the welfare conditions which must be met by free-range farms before they are able to describe themselves as such.</p> <p>In particular, the number of hours each day the birds can have access to the outside should be defined, and some attempt should be also made to define the weather and health conditions which might preclude such access. If possible, how the required range management plan will be assessed for adequacy, and how compliance with it verified, should be made clear (e.g. '... shall be submitted to Animal Welfare Division, MAF for written approval').</p> <p>A maximum stocking density should be specified.</p>	<p>Disagree, not the purpose of this animal welfare code</p> <p>Disagree</p> <p>Disagree, though covered in MS 10</p>
	33	Broad agreement with MS#3.	Noted
	36	MS seen as appropriate and supported.	Noted
Example indicators	30	<p>Most importantly, the requirement in the example indicators for shelter and shade (artificial or natural) to be provided and maintained should be amended to specify that such shelter and shade must be sufficient for all the birds to be able to use it at the same time, and should be accorded the status of a minimum standard (i.e. shifted to this section). This requirement is considered too critical to the essential idea of free-range farming to be omitted from the minimum standards, given that these are the only legally binding parts of the Code.</p>	Disagree
	33	We commend the Example Indicators and request these be incorporated into MS#3.	Disagree
	36	<p>Example Indicators seen as appropriate and supported.</p> <p>First point: refers to lack of competition at pop-holes. A more realistic indicator would be 'minimal competition', as some competition is normal.</p>	<p>Noted</p> <p>Agree, change made</p>
	40	Suggest that more information of what a Range Management Plan is, since the coverage in the Example Indicators is not particularly substantive.	Disagree

Section 4.2, Housing and Equipment			
MS4	21	Houses should be checked for dead chickens every day to avoid spread of disease.	Disagree, though covered by MS 14.
	24	<p>Sheds, facilities and equipment should be designed, maintained and operated to ensure minimal interference or stress to the chickens.</p> <p>Materials used for the construction of accommodation, and, in particular for the construction of pens, cages, stalls and equipment with which the animals may come into contact, shall not be harmful to them and shall be capable of being thoroughly cleaned and disinfected.</p> <p>Advice on welfare aspects should be sought from qualified advisers before any new buildings are constructed or existing buildings modified. It is important to ensure that the design of housing and equipment is suitable for the intended use. The incorporation of facilities for raising drinkers and feeders to aid access for handling equipment should be considered. Consideration should also be given to the incorporation of weighing, handling and loading facilities.</p> <p>A system should be in place for the repair and maintenance of alarms, heating and cooling systems, ventilation systems (natural or mechanical), mechanical feed and water delivery systems and other facility defects that may impact on bird welfare.</p> <ul style="list-style-type: none"> • Records of major repairs/defects and actions taken should be kept. • Regularly test electrical, safety and other facility systems to ensure their operation. <p>Facilities for water and feed provision should be checked daily to ensure that they are fully operational and deliver as required.</p> <ul style="list-style-type: none"> • This may include inspecting and raising drinkers and feeders to ensure appropriate height/positioning and bird access as the chickens grow. Facilities for water/feed should be appropriately designed and positioned to ensure chickens can access with ease. • Water pressure/height gauges should be checked to be set accurately, are fully operational and that water is available to chickens at all times. Feeder adjustment devices are checked to be operational at all times. <p>As a guide, drinker and feeder lines and individual drinkers and feeders at specific sites should be inspected on a daily basis to ensure water and feed availability as required.</p>	Noted, information adequately covered in MS and EI
	26	<p>3000 chickens died unnecessarily at an intensive farming operation in Canterbury as a result of the September 4 earthquake. They died because equipment and stands were not securely fixed within the shed in which these hens were kept (reference to news article). While these hens were kept in a battery farm for the egg industry, equipment employed in the housing of broiler chicks should also be made to comply with basic welfare and safety practices relating to earthquake management in order to avoid a similar catastrophic outcome in the future.</p> <p>MS4 in relation to housing and equipment for broiler chicks should include that all</p>	<p>Noted, though example was layer hens in cages</p> <p>Disagree, though new</p>

		relevant equipment within sheds is securely fastened to avoid injury during natural disasters such as earthquakes.	Contingency planning section added
	30	MS4(g) should be expanded to include a requirement for these alarms to be operating properly. Any clause requiring equipment important to maintain welfare should incorporate a stipulation that the equipment be operational and maintained in accordance with the manufacturer's instructions, and for contingency measures to be in place and documented.	Disagree, though new Contingency planning section added
	33	Broad agreement with MS4.	Noted
	36	Supports MS.	Noted
	40	Is the first minimum standard actually 'enforceable'? We note that it is in the current Code but question what section of the Act one would be possibly contravening if this was not complied with? We suggest there needs to be more information and requirement for a contingency plan in case of disasters. The effect of the Canterbury earthquake on an egg layer facility is a timely reminder that intensive animal husbandry units are particularly vulnerable in natural disasters. While MS4 (g) does address this partly, we suggest more information needs to be included.	Noted Agree, new Contingency planning section added
Example indicators	33	We commend the Example Indicators and request these be incorporated into MS4.	Disagree
	36	Supports Example Indicators.	Noted
RBP	33	We commend the RBPs and request these be incorporated into MS4.	Disagree
New Section on Contingency planning			
	24	RECOMMENDED ADDITIONS TO THE CODE 1. Recommended New Minimum Standard – Planning and Contingencies The current draft Code of Welfare does not include a minimum standard for planning and contingencies. Given the strong possibility of emergency situations, or even power outages, it is imperative that such a standard is also included to minimise stress and fatalities. (have suggested a model and given reference) 2. Recommended Guiding Principles 1. The health and welfare of chickens is a primary consideration at all stages of poultry production. 2. The critical relationship between animal welfare and animal health is recognised. 3. The operation of all poultry production systems need to be conducted in a manner in which accountabilities and responsibilities are clearly defined and met. 4. The overall goal of the broiler chicken industry is to deliver high animal welfare standards that are integrated across the production chain to ensure the welfare of poultry from birth to slaughter. 5. The internationally recognised 'five freedoms' provide guidance on animal	Agree, New section and MS added

		<p>welfare</p> <p>6. The scientific assessment of animal welfare involves diverse elements which need to be considered concurrently. Selecting and weighting of these elements often involves value-based assumptions which should be made as explicit as possible.</p> <p>7. All persons managing poultry have a legal and moral responsibility to care for the welfare of chickens under their care and control.</p> <p>8. The use of animals carries with it a duty to ensure the welfare of such animals to the greatest extent practicable.</p> <p>9. Animal welfare considerations should be included in quality assurance programs. (references provided)</p>	
Section 4.3.1 Lighting			
General comments	25	<p>The provision of low levels of artificial lighting on a virtual 24-hour basis is used by the poultry industry to encourage rapid growth of broiler chickens. <i>redacted</i>, writing on poultry welfare, states: "If hens, broilers or broiler breeders are kept in low light levels they are not able to show normal exploratory behaviour. At the lowest levels eye development is impaired and clear welfare problems are indicated at light levels lower than 20 lux" (<i>Sustainability and animal welfare with reference to developments in poultry welfare – 2001</i>).</p> <p>We note the comment by NAWAC of their intention to consider available science on this matter and feel that any decision made on such research should be with the paramount intention of improving animal welfare and not in maximising broiler chicken growth rates. Broiler chickens are naturally curious and social animals and sufficient light levels are necessary to allow these animals, as prescribed by the AWA, to interact with one another and perform natural patterns of behaviour.</p> <p>We furthermore submit that the monitoring of lighting levels is difficult at best and therefore, given the importance these levels play on the animals' welfare, all such lighting patterns and levels be documented on site for a period of 6 months.</p>	<p>Noted</p> <p>Noted</p> <p>Disagree</p>
	33	More stringent control of lighting is recommended (based on scientific research).	Noted
	39	The manipulation of lighting permitted by the draft Code does not allow the birds to establish the rhythms of behaviours (eating, sleeping, preening, dust bathing, foraging) that would be normal for them.	Disagree
Introduction	40	We note that minimum light intensities that are in the current Code have been removed and the requirement for 10 lux has been placed in the Introduction. What is the reason for this? We understand that this is industry practice, therefore compliance is not an issue. If the reason is because it is viewed as too prescriptive, then there still remain in other minimum standards, some very prescriptive standards.	Agree, 20 lux included in EI
MS5	16	The proposed MS does not allow for any natural light. Suggest a minimum of 4 hours a day of natural light be available. Artificial light, as any office worker who has to work with no access to natural light will tell you, is a contributor to poor mental and physical health.	Disagree

		Being deprived of natural light for a chicken's entire life is not humane. Chickens should be given a continuous period of at least 4 hours of darkness in every 24 hour period, they need to sleep too. The minimum light level should be 10lux at bird eye height, so they can see adequately.	Agree, MS reworded Agree, 20 lux included in EI
	24	Chickens should be housed at light levels which allow them to see clearly and which stimulate activity. This should be provided by lighting systems designed, maintained and operated to give a minimum light level of 10 lux at bird eye height. Illumination of the house to at least 20 lux will further encourage activity. Houses should have a uniform level of light. If a behavioural problem such as cannibalism occurs, it may be necessary to dim the lights for a few days. Broiler chickens which do not have access to daylight should be given at least 8 hours of artificial lighting each day. It is important for bird welfare to provide them with a period of darkness (not less than 30 minutes) in each 24 hour cycle. This ensures the chickens become used to total darkness and helps to prevent panic in the event of a power failure. Longer periods of darkness can reduce mortality and improve leg health.	Agree, 20 lux included in EI Disagree
	25	MS5 should have the following additional minimum standard added: (g) The lighting patterns used must meet requirements, be documented, and records must be kept on site for a period of no less than 6 months for auditing purposes.	Disagree
	26	MS5(c) contradicts MS10 (Providing for the Behavioural Needs of Chicks). It is normal behaviour for chicks up to 6-8 weeks of age to have extended sleep periods as per their natural environment (i.e. coinciding with normal hours of night-time). Manipulating periods of light and dark so these are intermittent (e.g. 3 hours light followed by 3 hours dark), as proposed on page 13 of the draft Code, breaches the MS that allows for normal behaviour of chicks. MS5 (c) should specify 16 hours light and 8 hours dark. MS5 (d) also contradicts Minimum Standard No. 10 (Providing for the Behavioural Needs of Chicks). MS5(d) in effect discourages chicks from eating, which does not ensure that the typical behavioural needs of these birds are being met.	Disagree Disagree, though deleted
	30	NAWAC's intention to 'examine current science, including the results of research on lighting that is currently underway overseas' before it finalises MS5: What opportunity will the public have to comment on the minimum standard which is eventually derived from this research? There is certainly research showing that birds experiencing a lighting schedule incorporating significant (8hours) darkness have a better welfare status than birds raised in 24 hour light (e.g. <i>redacted</i>). In the absence at the present time of the findings of the research NAWAC refers to, I suggest that on this occasion NAWAC consider abandoning its usual tendency to favour gross productivity where there is not what it considers to be politically compelling welfare evidence conflicting with this, and set a lighting schedule closer to a natural diurnal pattern. This specification can always be modified when the Code is next reviewed, if the awaited information supports this.	Noted
	33	Research strongly suggests that providing at least four hours of continuous dark is better for leg health than keeping broilers under continuous light. This is because shorter day	Agree, MS reworded

		<p>lengths slow down growth, which is considered beneficial in reducing metabolic demands and improving joint health and bone development. The importance of providing a dark period is acknowledged in the Minimum Standards in the draft Code of Welfare. Tegel have recently stated that the industry standard for their company is at least eight hours darkness every day, so this needs to be stipulated in the Code of Welfare.</p> <p>However, what is not mentioned is the importance of providing a 24 hour light cycle. Given that most behavioural and physiological cycles in animals are circadian, and entrained by a 24 hours cycle, it stands to reason that where there is no natural daylight, all light-dark (LD) cycles should be of 24 hours duration. Chickens are known to develop a circadian rhythm of feed intake when reared in continuous darkness. There is also direct experimental evidence that a 24 hour cycle improves leg health cycle improves leg health. The requirement for a 24 hour light-dark cycle (LD24) should therefore be written into the Minimum Standard.</p> <p>The draft MS5 states that chickens should be “able to see each other”. However, given that light levels are easily quantified with cheap and readily available equipment, and given the number of studies that have quantified light preferences for chickens, it would be more appropriate to specify lighting levels. This would also make the Minimum Standard easier to enforce. In the UK, DEFRA guidelines are for 10 lux, with 20 lux recommended. Chickens given a choice between 6, 20, 60 or 200 lux preferred to rest at 200 lux at 2 weeks and at 6 lux at 6 weeks. When active, all birds preferred 200 lux. Since dim lighting may cause painful conditions in birds, it is important that adequate lighting be provided during light periods. (references provided)</p> <p>The following amendments to MS5 are therefore suggested:</p> <p>a) Lighting intensity after placement of the chicks in the brooding area must be at least 20 lux.</p> <p>b) After placement, there must be a light-dark cycle of 24 hours, with at least eight hours of darkness per 24 hour cycle</p> <p>c) Lighting levels during inspections must be sufficient to stimulate activity of the birds and allow birds and equipment to be inspected.</p>	<p>Disagree</p> <p>Disagree</p> <p>Agree, 20 lux included in EI</p> <p>Disagree</p> <p>Agree, already a MS</p>
36		<p>Supports MS as outlined in draft Code. Supports the proposals on lighting included in the Code. The proposal in the Code, and the commercial practice in New Zealand, is a minimum of 4 hours’ darkness in every 24 hour period. Science supports the position that the total duration of darkness in each 24 hour period is more important for broiler welfare than the duration of the darkness periods. The most comprehensive research on lighting programmes and animal welfare shows that either near constant light (e.g. 1 hour darkness) leads to poorer welfare and productivity. A wide variety of constant and intermittent lighting schedules offer benefits for animal health and welfare with noticeable improvements in animal welfare relative to near constant lighting. There is evidence that a minimum period of 4 hours as per the Code is appropriate.</p> <p>MS5 (c) requires a minimum dark period of four hours and this is supported. The</p>	Noted

		scientific evidence supports that this is not required as a single block and the wording could be changed to make this clear.	Disagree, wording changed requiring continuous period of darkness
	40	In relation to the NAWAC comment, the work of recent visitor <i>redacted</i> would seem to indicate that the duration of the dark period is indeed important i.e. at less than 4 hours continuous darkness, welfare is compromised as are various production factors. We would like to see a minimum of 4 hours continuous darkness as a minimum standard. It also seemed clear that gradual change to darkness and particularly to light had welfare advantages in minimising the rush to feeders that can be the result of sudden onset of light, which can result in excessive competition and possible injury. MS 5 (d) Suggest 'harvested for processing' should be reworded, as it sounds too sanitised. Perhaps 'collected for slaughter'.	Agree, wording changed requiring continuous period of darkness Noted, already a RBP Agree, though deleted
Example indicators	36	Point 5: Submits that the word " <i>documented</i> " could be changed to " <i>auditable</i> ". This submission is based on the fact that farmers do not usually write down the lighting patterns on a daily basis. A number of farms operate with lighting computer programmes which are recorded and auditors can be shown and identify the lighting programmes that were set. The shed control computer can be searched to show past lighting patterns. There are also a proportion of older farms with out computer systems where the lighting programmes are put in writing. Submits that whichever system applies auditable is a better reflection of how the indicator can be addressed.	Disagree
	40	Point 2: 'Birds are not adversely affected by the length of the training period.' What does this mean? How would you determine this? Point 3: 'Darkness is provided for a minimum of four hours in every 24-hour period.' This is already a minimum standard, so why is it repeated in the Example Indicators?	Agree, deleted Agree, deleted
RBP	26	RBP ('Lighting should be dimmed gradually at lights off and increased gradually at lights on, to allow broilers to adjust to different light intensities') should be listed as an MS, rather than a RBP. This is obviously in the best interests of broiler welfare, but it should be a minimum requirement not a practice that may be adopted if a farmer chooses.	Disagree
Section 4.3.2, Ventilation			
General comments	25	Ventilation and the control of ammonia build up in broiler chicken sheds is crucial to the health and well being of the animals. Serious respiratory illness and/or skin problems can easily result from poorly managed systems and operators are required to provide a safe healthy environment for all animals in their care. It should be a requirement of all operators to maintain a register of temperature, humidity and ammonia levels in their sheds. This allows for easy reference and monitoring of farm practices by any investigating agency, and helps ensure a level of compliance with the minimum standards maintained. We see little point in having minimum standards that are unable to be enforced due to the inability of an inspector to check previous readings.	Noted Disagree

	33	More stringent control of ammonia levels is recommended (based on scientific research).	Noted
Introduction	36	Suggest second paragraph: Air humidity can be influenced by both external ambient conditions and internal factors within the <i>meat chicken</i> shed. Examples of internal factors within the <i>meat chicken</i> shed that govern humidity are stocking density, live weight of the birds, ventilation rate, indoor temperature, <i>water consumption</i> , malfunction of technical equipment and litter quality. <i>Ventilation rate requirements can also be influenced by the correlation between feed quality/suitability and the water uptake ratio.</i>	Agree, changes made Disagree
	40	3rd paragraph: What are 'Ammonia problems...'? Would it be worthwhile to suggest what corrective actions can be taken when ammonia levels exceed 25ppm? Would it be worthwhile expanding what would be seen when dust levels cause discomfort e.g. lacrimation, conjunctivitis, coughing etc?	Disagree, though wording changed Disagree, though wording changed
MS6	21	Some additional ideas: <ul style="list-style-type: none"> - real ventilation by leaving windows open - electric fans - leave open spaces for chickens to roam around in (already in such confined space they should have the opportunity to have a little more reality) 	Disagree
	24	Ventilation rates and house conditions should at all times be adequate to provide sufficient fresh air for the chickens and keep the litter dry and friable. Extremes of temperature should be avoided. Air quality, including dust level and concentrations of carbon dioxide, carbon monoxide and ammonia, should be controlled and kept within limits where the welfare of the chickens is not negatively affected. In particular, the concentration of ammonia should not exceed 20ppm of air measured at bird height level. Natural or mechanical ventilation systems must be operational and effective in providing adequate air exchange for the age and number of chickens. <ul style="list-style-type: none"> • Minimum ventilation targets should be met as recommended by the owner and according to the relative humidity and temperature at all times. • Records of temperature and humidity should be kept at least at times of high humidity (80% or above) and high temperature (30°C or higher) 	Noted Noted, wording changed Agree, change made Disagree Disagree
	25	MS6 should have the following additional minimum standard added: (c) Temperature, humidity and ammonia readings must meet requirements, be monitored and recorded; with the records being kept on site for a period of no less than 6 months for auditing purposes.	Disagree
	26	What level of ammonia causes 'reduce feed intake, irritate mucus membranes, cause air, sac lesions and keratoconjunctivitis', and reduced 'foraging, preening and resting behaviours' in broilers? The proposed level of 25ppm is given as the level which causes eye and nasal irritation in people, but there is nothing in the draft to indicate what level causes irritation in broiler chickens.	Noted, wording changed and level decreased to 20 ppm
	33	As mentioned in the draft Code of Welfare, ammonia is an irritant to birds, and it is also	Disagree, though RBP

		<p>implicated in contact dermatitis and hock burn. Aversion tests have shown that broilers found concentrations of ammonia of 10ppm to be aversive.</p> <p>The eight-hour exposure limit for human health in the UK is 25ppm, and this is also the limit allowed in the draft Code of Welfare. In the UK, DEFRA recommends a limit of 20ppm for broilers. Given that broilers are exposed not for eight hours, but for 24 hours, and that they find levels as low as 10ppm aversive, these figures are too high. A figure of 7ppm for the occupational health of humans in broiler houses and 11ppm for the health of pigs has been recommended, based on a review of the literature. (references provided)</p> <p>Proposes that MS6 (b) be repealed and amended as follows:</p> <p>b) Ammonia levels must be measured daily at the height of the chickens' respiratory organs in broiler houses, using a recognised method.</p> <p>c) Ammonia levels must not be greater than 7ppm.</p> <p>d) If ammonia levels are greater than 7ppm when monitored, immediate corrective action must be taken.</p>	<p>changed to 10 ppm</p> <p>Noted, wording changed and level decreased to 20 ppm</p> <p>Disagree</p> <p>Disagree, though changed to 20 ppm</p> <p>Disagree, though wording changed</p>
	36	<p>MS6 (a) be amended to remove "<i>humidity</i>".</p> <p>There are a number of poultry sheds that do not have humidity sensors. Humidity sensors have proven susceptible to dust, and therefore ineffective, and also expensive to maintain in such circumstances.</p>	Disagree
Example indicators	36	<p>Humidity readings in the Example Indicators should also be removed. There are a number of poultry sheds that do not have humidity sensors. Humidity sensors have proven susceptible to dust, and therefore ineffective, and also expensive to maintain in such circumstances.</p> <p>Second point: refers to "evenly" distributed. This could lead to issues in an audit situation if interpreted literally as there will always be a degree of unevenness.</p>	<p>Disagree, these are examples only</p> <p>Disagree</p>
Section 4.3.3, Temperature			
General comments	25	To encourage good farming practices in the industry it should be made mandatory for all operators to constantly monitor ambient temperature and have this information recorded and kept on site for inspection.	Disagree
	33	More stringent control of temperature and humidity is recommended (based on scientific research).	Disagree
Introduction	40	Suggest 'point of harvest' should be defined in the Glossary.	Disagree but wording changed
MS7	24	<p>Maximum and minimum temperatures should be monitored and recorded daily to assist management. Chickens should be protected from cold draughts. Efforts should be made to ensure that the ventilation systems do not result in large differences in air speed across the house.</p> <p>Chicks should be placed in the brooding area when they arrive in the house and their</p>	Noted

		<p>behaviour monitored carefully. Young chicks are particularly susceptible to extremes of temperature and an even distribution of the chicks in the house will indicate that they are comfortable. After 4-5 weeks chickens can tolerate a fairly wide range of temperatures but every effort should be made to avoid creating conditions which will lead to chilling, huddling and subsequent smothering.</p> <p>Chickens on restricted feed are more susceptible to low temperatures but less so to high temperatures. If the temperature is allowed to fall, there may be a need to increase feed or provide heaters.</p> <p>Chickens should not be exposed to strong, direct sunlight or hot, humid conditions long enough to cause heat stress as indicated by prolonged panting. Housing affects the chickens' ability to maintain their normal body temperature but under any management system ambient temperatures high enough to cause prolonged panting may occur, particularly when humidity is relatively high.</p> <p>All accommodation should therefore be designed so that its ventilation is adequate to protect the chickens from overheating under any weather conditions that can reasonably be foreseen. Attention should be paid to air throughput and distribution, especially at bird level.</p> <p>During the summer months consideration should be given to reducing stocking density at the time of ordering or placing day-old chicks. If suffering or mortality occurs, the onus will be on the person responsible for the chickens to demonstrate that the measures taken were appropriate for the design of the building, its locality and the predictable maximum temperature/humidity at the time.</p> <p>During hot and humid conditions, the chickens should be checked frequently, but not disturbed unduly.</p> <p>Steps should be taken to minimise the potential for heat stress by increasing ventilation and air speed at bird level. Portable back-up fans should be available. The air temperature within a building may be reduced by improved insulation, hosing the roof and the correct use of evaporative cooling of incoming air. The heat output of the chickens may be reduced by lowering stocking density or changing the feeding patterns. Facilities including fans, sprays, foggers, sprinklers and heaters must be regularly checked to ensure they are operational. A system should be in place or action is taken aimed to prevent the ambient temperature at bird level for fully feathered chickens exceeding 33°C (as far as practicable).</p>	
	25	<p>MS7 should have the following additional minimum standard added:</p> <p>(d) Ambient temperature at chicken level must be measured and recorded on a continuous basis and adjusted where necessary to be appropriate for the age of the chickens, and to follow broiler company guidelines. These records must be kept on site for a period of no less than 6 months for auditing purposes.</p>	Disagree
	30	<p>Is it not possible to give MS7 more 'teeth' by defining an envelope of acceptable temperatures? This would not detract from the other minimum standards for this</p>	Disagree

		parameter nor from the example indicators.	
	33	Thermal stress in chickens is related both to temperature and humidity. When humidity is high, birds cannot tolerate such high temperatures. High humidity is correlated with increases in lameness. The combination of temperature and humidity is measured as Apparent Equivalent Temperature (AET). An AET of less than 40°C and a dry bulb temperature of more than 10°C is considered safe for chickens. An AET of 65°C or more is considered to be a danger level. (references provided) MS6 needs to be amended to reflect this knowledge. a) Temperature and humidity must be monitored continuously. b) Temperature and humidity must be adjusted so that the Apparent Equivalent Temperature (AET) is less than 40°C and the dry bulb temperature is greater than 10 °C.	Noted Disagree Disagree
	36	MS7(b) Submits that " <i>or euthanase</i> " should be removed. This is a new introduction to the Code from the 2003 Code. Believes that prompt action taken to reduce environmental temperatures will address the issue and does not require the euthanasing of chickens. We therefore submit that the phrase " <i>or euthanase</i> " should be removed from the Code. In New Zealand ambient temperatures are not as high as some overseas countries and remedial action such as opening doors on sheds will alleviate high temperatures quickly to reduce heat stress in the birds.	Agree, change made
Example indicators	36	The Example Indicators are supported, but the third bullet point refers to "evenly" distributed and there will always be a degree of unevenness and an issue could arise if "evenly" is interpreted too literally.	Disagree
Section 4.3.4, Litter Management			
General comments	25	Good management practices should ensure that the floor environment of broiler chicken sheds are safe and hygienic for the animals, and that this should be mandated by a regular change of floor litter.	Disagree
	33	More stringent control of litter management is recommended (based on scientific research).	Noted
Introduction	40	We suggest some information about what types of litter are available. We also suggest some information to be included on 'friable' and how the risk of toxic agent contamination is minimised, as the only time these concepts are mentioned in this section is in the minimum standard.	Disagree Disagree
MS8	21	There is no mention on how regularly litter should be managed. Dirty litter could spread diseases and kill birds and is not suitable for comfortable living for the birds. Recommend cleaning leavings daily to set a high standard.	Disagree
	24	Broiler chickens spend their lives in contact with litter and their health and welfare are linked to its quality. Conditions such as pododermatitis, hock burn, foot pad lesions and breast blisters are consequences of poor litter quality. Well-designed equipment and high standards of management are important if good litter quality is to be maintained. The	Noted

		<p>ventilation capacity should be sufficient to avoid overheating and to remove excess moisture. The feed composition should be well balanced to avoid problems with wet or sticky droppings.</p> <p>Litter should be kept loose and friable and measures should be taken to minimise the risk of mould and mite infestation. It should be inspected frequently for signs of deterioration and appropriate action should be taken to rectify any problem. Mouldy litter should not be used. Litter should also be inspected to ensure it does not become excessively wet or dry, and should be comprised of appropriate materials for the birds being housed.</p> <p>A water system which minimises water spillage should be used, such as water nipples with drip cups positioned at an appropriate height for all chickens. Nipple drinkers without cups may be used if they are well managed and the water pressure is checked frequently.</p> <p>The extent to which litter is dry, friable (i.e. not caked) and of good quality across the entire shed depends on temperature (especially if utilising foggers), humidity, stocking density, feed type and quality, changes in diet or disease status, condition of the chickens, litter quality and overall shed management. Excessively wet litter can increase the risk of breast bruises, hock burn, foot lesions, etc and predispose birds to poor performance. When using foggers, because of the recognised compromise between reducing heat load and maintaining dry litter, careful monitoring of ventilation should occur. Dust should also be managed to ensure levels that do not cause harm to birds.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
	25	<p>MS8 should have the following clause added:</p> <p>(d) Daily inspections must be performed to detect excessive dustiness, excessive moisture, and localised wetness due to leaking drinkers and other water ingress, caking and ammonia production. Corrective action must be taken as necessary.</p>	Disagree
	33	<p>There is a link between wet or ammonia-saturated litter and contact dermatitis and hock burn. Litter quality is related to stocking density and some of the factors relating to poor litter management can be addressed by restricting stocking density to 30kg/m². Recommends an additional requirement that litter be completely changed with each batch of broilers, to prevent build-up of moisture and ammonia.</p> <p>The following should be added to MS8:</p> <p>d) Litter must be completely changed with each new batch of broilers.</p>	<p>Noted</p> <p>Disagree, though added as a RBP</p>
	36	Supports MS.	Noted
	40	A number of minimum standards from the current Code have been removed. The standards seem reasonable, so would like to see them included.	Disagree
Example indicators	25	We recommend that the example indicator suggesting daily checks should be made a minimum standard.	Disagree
	36	<p>Supports Example Indictors.</p> <p>Seeks a new paragraph to be inserted to read:</p> <p>There is a relationship between the quality and suitability of the feed supply and the condition of the litter, and therefore care must be taken throughout the feed</p>	<p>Noted</p> <p>Disagree</p>

		manufacturing process to ensure that quality standards are met at all times.	
Section 4.3.5, Stocking Density			
General comments	1	NAWAC needs to prescribe a limit to how many birds can be kept in an area. The negative issue about keeping chickens in barns is overcrowding, which causes factors NAWAC have stated i.e. inactivity, heat stress, lameness, cardiovascular disorders, skin disorders and other injuries due to competition for food and water. This means growers are not adhering to MS 9 and 10 and thus will not take notice of RBP in the future.	Noted
	2	The present conditions are appalling and reducing numbers of chickens per area would help to improve their lives.	Noted
	4,5,6,8,9,10,11, 12,13,14,15,17, 18,19,22,24,31, 32	Stocking densities should be vastly reduced and the industry demanded to move to less cruel systems of farming.	Noted
	24	Studies of broilers' behaviour at different stocking densities have shown that as they get more crowded they move less distance per hour, they are more often disturbed by others when they are resting, they do less pecking and scratching at the litter, and less walking and preening.	Noted
	25	<p>Stocking density of broiler chicken sheds is perhaps the area where animal welfare standards are at their worst in the industry, and there needs to be a concerted effort at reducing the stocking density of these sheds throughout the industry. We would like to see NAWAC aim for a goal of no more than 14kg of liveweight per m².</p> <p>With regard to the invitation to comment on the specific points mentioned in the draft under stocking density, we feel that the concept of operators managing stocking density internally, via the "animal welfare outcomes" listed, is a good idea that should be encouraged. Furthermore we agree with the indicators used to determine the "animal welfare outcome". We still feel however that there needs to be in place an overriding maximum stocking density that must not be exceeded. We would submit that, inline with the RNZSPCA submission of 2001, at this stage that maximum stocking density be set at 25kg liveweight per m².</p> <p>We would also like to take this opportunity to reiterate the need for a proper and specific definition of the term "Free Range".</p>	<p>Disagree</p> <p>Noted</p> <p>Disagree</p> <p>Disagree, not the purpose of this animal welfare code.</p>
	27	The section of the Code on Stocking Densities (4.3.1) is deeply concerning. The idea that those who make their living from the profits they earn by raising and selling chickens should be expected to have the welfare needs of the birds as their highest priority is deeply flawed. As evidenced by the industry term "growers", while those who run broiler chicken facilities may care for their birds, they still see them as a crop to be grown and harvested. As the Committee is aware, birds are not plants. They are animals with natural behaviours which include perching, foraging, running and flying. Despite section 10 of the Animal Welfare Act 1999 ensuring that these behavioural needs must be met,	Noted

		<p>financial profits obviously outweigh animal welfare in the poultry industry. As long as production is maintained, “growers” have no reason to spend time and resources on chicken welfare. It is simply not in their best interests.</p> <p>The issue of stocking density in chicken broiler enclosures and open environments is one on which the Committee must take firm and decisive action. Countless studies have shown that stocking density levels are related to numerous health problems in broiler chickens (provides references):</p> <p><i>“The data suggest that stocking density can act as a factor affecting the incidence of SDS [sudden death syndrome] in summer and winter, independent of feed efficiency’.</i></p> <p><i>“The effect of STD [stock density] was consistent across both trials; higher STD were associated with poorer walking ability and reduced live weights. In Trial 2, higher STD resulted in more foot and hock burns. ... The effect of high STD on walking ability was apparent even at 4 wk of age. ... It was concluded that the lower STD substantially reduced the prevalence of leg weakness.”</i></p> <p><i>“The main significant effects of stocking density treatment were a linear decline in food intake with increasing density during week six (the final week), and a reduced proportion of time spent panting deeply during weeks five and six at the lowest density. Increased (shallow and deep) panting shown by females in weeks two to five suggests that if thermal discomfort becomes a problem at higher stocking densities later in the growing period, it may do so earlier in female.”</i></p> <p>Stocking density has also been shown to negatively affect production levels:</p> <p><i>“Stocking density had a significant effect on broiler productivity. Increasing the stocking density from 13 to 17 birds/m² had a negative effect on most production parameters...”</i></p>	Noted
	28,29	<p>It is totally unacceptable to most New Zealanders that chickens are crammed into windowless sheds with little room to move. The Animal Welfare Act 1999 (AWA) requires that animals must be allowed to express their normal behaviour and this is impossible under the stocking rations currently permitted on New Zealand factory farms for broiler chickens. Also the chickens must constantly compete to reach supplies of food and water. The floor space allocation for each bird is less than the size of an A4 sheet of paper at best, and this allowance decreases as the birds grow in size. The standards should be improved so that stocking densities are greatly reduced and the current intensive farming practices are declared illegal on the ground of animal cruelty.</p>	Noted
	31	<p>Is concerned that under the new Code broiler chickens will continue to be kept in high densities.</p>	Noted
	33	<p>Stocking density is also a vital component in broiler welfare. It has direct and indirect effects on lameness and contact dermatitis. The allowed stocking density in the draft Code of Welfare is too high.</p> <p>It is widely reported in the scientific literature that stocking density correlates to a number of welfare problems. Stocking density also affects contact dermatitis and hock burn. Behaviour is affected at higher densities. There is evidence to suggest that lameness,</p>	Disagree Noted

		<p>Whether there needs to be a maximum limit for free range stocking density in the minimum standard? Would it be possible to state a minimum area /bird rather than a maximum stocking density limit? We recognise though, it may be easier (due to lack of sufficient and robust practical data) to be determined by animal welfare outcomes. What this limit should be? Refer to industry for advice on industry practice</p> <p>Whether this welfare outcome (i.e ability to move and forage freely, and avoid competition all completion [is this a typo?]) for food and water) is appropriate? It is impossible to eliminate all competition given the hierarchical nature of the 'pecking order' of poultry. However the ability to move and forage freely would be a good example of an outcome.</p>	<p>Noted</p> <p>Agree, correction made, though wording changed</p>
MS9	1	Under MS9 a 1.8kg to 3.0kg bird allows growers to put 13 to 21 birds into a square metre and common sense tells us that the chickens' welfare will be compromised under these conditions.	Disagree
	3	The stocking density of 38kg per square metre does not allow broilers to perform their natural behaviours intended by the AWA 1999 (such as walking, extending wings and pecking at the ground). Crowding has been shown to significantly reduce broilers' ability to rest, which can be a significant source of stress (references provided).	Disagree
	16	Does not agree with the proposed stocking density of 38kg per square metre. This is far too high. This is a measurable standard, unlike the other standards proposed. Thus, stocking density should indeed be specified, and the maximum should be 20kg per square metre to ensure the best chance of a chicken's wellbeing and ability to exhibit natural behaviour.	Disagree
	24	<p>A variety of factors need to be taken into account when setting and monitoring stocking densities in chicken houses at levels which promote good welfare. The observance of any particular stocking density is important but cannot, by itself, ensure the welfare of the chickens. There is a close relationship between stockmanship, environmental control and stocking density. Chickens will be maintained in good condition only if the balance is right and the onus is on the producer to demonstrate that welfare is not compromised, whatever the stocking density. Stocking density should be reduced and specialist advice taken if problems occur, in particular excessive heat or humidity due to inadequate ventilation and poor litter quality. If disease or environmental problems arise in a particular building or system, reducing the stocking density in subsequent flocks may lessen the likelihood of recurrence. A notice indicating the internal floor area available to the chickens should be clearly and permanently displayed at the entrance of each house. This, along with other recorded information, will facilitate calculation of the stocking density. Deliberately placing a high number of chickens and routinely "thinning" should be avoided as this causes unnecessary distress to the chickens and may result in stocking densities that are too high.</p> <p>It is clear from the behaviour and leg disorder studies that the stocking density must be 25 kg/m² or lower for major welfare problems to be largely avoided, and that above 30 kg/m², even with very good environmental control systems, there is a steep rise in the</p>	<p>Noted</p> <p>Disagree, though RBP added</p>

		frequency of serious problems.	
	25	<p>We also note that among the changes from the previous Code, the minimum standard relating to the keeping of records that relate to stocking densities has been removed. This, we feel, is unhelpful and needs to be reversed. It is necessary to mandate the keeping of stocking records within sheds on site, and that these records are made available for auditing purposes. This enables easy and open checks to be made of operator management practices as they pertain to the maintenance of animal welfare.</p> <p>MS9 should be amended to read: (b) Placement of broiler chicks in individual broiler sheds must be scheduled so that the planned stocking density does not exceed 25kg of live weight of broiler chickens per square metre. MS9 should, have the additional clauses added: (d) Information on liveweight, stocking density and planning must be recorded and made available for audit. The report must be maintained for a period of two years (e) Birds with an obvious gait deficit must be culled. Where the number of culls for lameness is higher than expected for the age and strain of the birds, activity of the flock must be recorded and stocking rate adjusted accordingly if birds are inactive because of overcrowding.</p>	<p>Disagree</p> <p>Disagree</p> <p>Disagree</p> <p>Disagree, though some information included in EI and MS14</p>
	26	<p>There is plentiful scientific evidence that, in nature, flocks of chickens are small (under 15 birds per flock). There is no way for broiler farms to meet the natural requirements of chickens, whether they take the form of grow out sheds or free-range arrangements. Therefore all intensive farming operations for chickens, ie broiler farms which are not maintaining small flocks of chickens, are not sufficiently meeting the welfare requirements of chickens.</p> <p>MS9(b) indicates that approximately 10 broiler chicks may occupy a space of one square metre without the physical welfare of these chicks being compromised, or without them suffering undue stress. Such a restricted space does not adequately permit natural behaviours to be carried out (lists behaviours). MS9 (b) should be changed to permit greater room for birds to engage in the normal behaviours listed above, particularly in order that chicks have space to avoid interactions with other birds. The current minimum space allocated in this draft Code means 10 birds will be in close proximity at all times. This does not comply with MS10 (Providing for the Behavioural Needs of Chicks).</p>	<p>Disagree</p> <p>Disagree</p> <p>Disagree</p>
	30	<p>There is an essential mismatch between the proposed maximum stocking density (MS9(b)) and proposed MS10, which states that chickens must have the opportunity to express normal patterns of behaviour. How can normal behaviours possibly be expressed/achieved as the stocking density approaches 38 kg/m²? Several of the minimum standards use 'distributed evenly over the floor' as an example indicator of compliance – at around 19 birds (depending on slaughter weight) per square metre how could they be anything but 'evenly distributed' or more accurately, 'wall-to-wall'? The single example indicator of MS10 is that chickens 'show levels of activities that are</p>	<p>Disagree</p>

		<p>normal for their age’ – I think anyone with any practical experience of poultry keeping will attest to the fact that the exploratory activity so characteristic of chickens in more natural environments simply cannot happen at these densities. Whatever the intention, there is no point in proposing a standard which cannot be met if broilers are stocked at a density which is fully in compliance with another standard.</p> <p>I am aware that the proposed maximum stocking density is similar to overseas standards, that lowering stocking density on its own will not necessarily achieve sought after levels of broiler welfare and that ‘Genuine improvements in bird welfare will come from setting standards that combine stocking density, safeguards on the environment, and the genetic makeup of the birds’ (<i>references provided</i>).</p> <p>The draft Code offers no information about how the proposed maximum stocking density of 38kg/m², which is more than half of the maximum stocking density for chickens being transported, was derived. Discussion in the draft Code states that it is based on current good practice and scientific evidence, but this scientific evidence is not referenced. The report accompanying the 2003 Code noted the large number of submissions received which expressed concern about stocking density, and stated: ‘Given the lack of New Zealand based research, NAWAC encourages the undertaking of such research. NAWAC will review the maximum stocking density within five years to take into account new international and New Zealand research.’ Was such a review carried out? The press release accompanying this draft Code states that it was, but there is no reference to it in Section 4.4.1, nor is there any readily locatable link to it on MAF’s website. Did NAWAC encourage the undertaking of research into this question in any practical way?</p>	<p>Noted</p> <p>Disagree</p> <p>Yes see report which accompanies this code</p>
	31	The current legal stocking density (38kg per square metre) is cruel and unethical. At these densities animals are not able to carry out basic natural behaviours such as running, perching, foraging and flying. This is in breach of the AWA 1999.	Disagree
	33	<p>Request that MS9 be repealed, and the following MS to be substituted.</p> <p>a) Placement of broiler chickens in individual broiler sheds must be scheduled so that the stocking density never exceeds 30kg of live weight of broiler chickens per square metre.</p> <p>b) Birds with visible lameness must be culled. Where the number of culls for lameness is higher than expected for the age and strain of the birds, stocking rate must be reduced to no more than 20kg of live weight of broiler chickens per square metre.</p>	<p>Disagree</p> <p>Disagree, , though some information included in EI and MS14</p>
	36	MS9(c) Submits that the phrase “ <i>or are excluded from access to food and water</i> ” should be removed. As the food and water are in the house and not on the range, this phrase is not relevant.	Agree, wording changed
	40	It is not clear how MS 9(b) differs from the RBP, i.e. both specify a maximum of 38Kg per square metre.	Disagree, though RBP wording changed
Example indicators	25	We feel that the example indicator relating to the culling of birds with an obvious gait deficit, and the monitoring and adjusting of stocking densities thereof, is a good management practice that should also be a minimum standard in any modern broiler chicken farm.	Disagree, , though some information included in EI and MS14

	33	The requirement that lame birds be euthanized, presently an Example Indicator, must be made into a MS.	Disagree, though some information included in MS14
	36	Third point: Birds may be inactive for lengthy periods of time but it would be impossible to determine if it was caused by overcrowding. The sentence is confusing and PIANZ submits the second sentence should be deleted. Fourth point: Submits this should be removed as the Code is outcome-based and should therefore not have a prescriptive Example Indicator.	Disagree, though wording changed Disagree
	40	Where are the expected numbers of culling for lameness found? Suggest they should either be in an appendix or advice should be provided where they can be obtained.	Agree, wording changed
RBP	1	Strongly recommend RBP of 'broiler chickens to be stocked at less than 38kg per square metre at all times' be changed to 7 to 11 birds per square metre or to whatever it takes to rid industry of overcrowding.	Agree, wording changed to 30kg/m ²
5. Providing for the Behavioural Needs			
General comments	24	Irrespective of the type of system, all chickens should have the ability to perform natural behaviour and have sufficient freedom of movement to be able, without difficulty, to stand normally, turn around and stretch their wings. They should also have sufficient space to be able to sit without interference from other chickens.	Noted
	26	Broiler chicks are removed from any contact with a mother hen so they are never permitted 'normal' living conditions or behavioural learning. Aside from this, few if any of the normal behaviours are permitted in broiler farms with stocking densities of 10 chicks per square meter, absence of soil substrate and sunlight, absence of nests or roosts, absence of objects which enrich existence and satisfy the propensity of chicks to frolic, spar and explore.	Noted
	30	Supports: The intention to strengthen, in the case of broiler chickens, the provisions of the Animal Welfare Act which pertain to the behavioural needs of animals by introducing a minimum standard in the draft Code specifically recognising these needs (although the actual draft standard is considered insufficient, and unachievable in the context of current broiler farm practices and particularly the proposed stocking density).	Noted
	36	Supports the inclusion of behavioural needs as a Minimum Standard in the Code. Meat chickens raised commercially in New Zealand can and do demonstrate behaviours such as preening, scratching, ground pecking, running, wing flapping and stretching, dust bathing and vocalizing.	Noted
	37	There should be some environmental enrichment to keep them busy and allow them to draw on their instincts and indulge in instinctive natural behaviours.	Noted, already included as RBP
	39	The lack of access to sunlight and dust means the birds cannot sunbathe or dust bathe, which are fundamental behaviours for chickens.	Disagree
Introduction	40	We do not think the following section on transport meets the statement 'The minimum standards and associated suggested indicators outlined in the remainder of this Code also address the behavioural needs of broiler chickens can provide advice on how these	Disagree, though wording changed

		needs can be met.' While this section does require humane handling, it is more about the handlers, stocking densities, rather than addressing behavioural needs. Suggest that this section comes before the Behavioral needs section.	
MS10	24	This standard is woefully inadequate, and gives scant recognition to the chickens' behavioural needs. The belief that factory-farmed chickens have lost their natural behaviours and are content to live in crowded and unstimulating environments is contradicted by contemporary avian science and by the variety of natural behaviours displayed by these chickens at animal sanctuaries. Chickens who have been bred for broiler show normal patterns of behaviour when they are young; as they get older they become more sedentary, due to overly heavy breast muscle tissue, painful lameness in their hip joints, and metabolic disorders that affect the capacity of their hearts and lungs to function normally and that can lead to heart attacks at an early age. Chickens raised for broiler suffer from a lack of sensory and mental stimulation, physical activity, and bodily comfort. Reducing animals to mere "behaving organisms" and "productive units" is not animal welfare.	Disagree, though information added to GI
	25	We are pleased to see a new section in the current draft relating specifically to the behavioural needs of layer hens. We feel however that the proposed minimum standard is little more than a reiteration of the wording of the AWA, give or take a few words. The provision of environmental enrichment for broiler chickens is something we feel should be mandatory. MS10 should have the following clause added: (b) Birds must be provided with environmental enrichment aimed at maximising the type and incidence of behaviours that are normal for their age.	Agree, wording changed Disagree
	26	At the very least MS10 should specify that chicks must have access to bales of hay or straw, as well as space to stretch and preen, and areas where they can escape or get away from other chicks for periods of time. These conditions should not be Recommended Best Practice(s) but minimum requirements, if the Code of Welfare for broilers is serious about improving the living conditions of chicks raised for meat.	Disagree
	30	Opposed to the failure of the MS10 to require environmental enrichment. Enrichment is not included as an example indicator either; it appears as a 'recommended best practice' only. The provision of environmental elements which reduce the sterility and homogeneity of the broiler shed, such as string bunches or lucerne hay, would provide some opportunity for foraging and exploration. Without access to such material, chickens are simply unable to express normal patterns of behaviour as minimum standard 10 requires, and for this reason the requirement for environmental enrichment must be made an explicit minimum standard, with the associated status of a legal requirement.	Disagree
	33	Supports MS10, but notes that the higher stocking densities allowed in the proposed Code of Welfare do not allow normal patterns of behaviour to be expressed.	Disagree, though information added to GI
	36	Supports MS.	Noted
	40	The minimum standard is just stating what is in section 10 of the Animal Welfare Act.	Agree, wording changed
Example indicators	36	Supports Example Indicators.	Noted

	40	What are the behaviours that are normal for their age? The Example Indicator is meaningless as it just states what the MS states.	Agree, wording changed
RBP	33	Requests RBP to be incorporated into MS10.	Disagree
General information	40	Suggestions for environmental enrichment should be given, or are bales it?	Agree, information added to RBP
6. Physical handling			
General comments	28,29	Want cruel handling practices which cause unnecessary pain and distress to the chickens prohibited. Birds should not be carried by their legs or crowded into small crates. The processes at the slaughterhouse also show insufficient care for the wellbeing of the chickens. It causes undue suffering for the birds to be shackled upside down. Many are not stunned properly and struggle and experience pain. The standards need to specify that chickens are handled in such a way as to ensure the minimum amount of injury and distress while they are still alive, and a quick and painless death.	Noted
Section 6.1, Catching, loading and transport			
General comments	3	Impose stricter standards on handling broilers prior to slaughter. The current lack of oversight and regulation around catching broilers prior to transport and at the slaughterhouse allows unnecessary suffering. This is particularly true since workers are often handling birds by their already broken legs (<i>references provided</i>).	Noted
	25	Due to the fact that it is acknowledged that the transport and handling of animals is innately an extremely stressful time, we are disappointed that NAWAC has attempted to incorporate all aspects of the procedure into one minimum standard. We feel the current Code, in which the catching, loading and transport process is broken down into 4 distinct sections, allows for a more comprehensive explanation of what is required as a minimum standard of operation during this time. It is assumed in the current Code that the practice of carrying multiple chickens at one time by handlers is commonplace, and for this reason we are disappointed that the minimum standard relating to this practice has been omitted from the draft. We concur with the RNZSPCA submission of 2001 in that "catching and carrying eight broiler chickens at a time increases the likelihood of injury to the chickens. Even carrying two broiler chickens in each hand by both legs will, in our view, often result in distress and injury to the chickens. Ultimately, our preference is for each broiler to be individually loaded into the transport containers".	Disagree Disagree, though an MS added
	30	Section 6.1 discusses the need to minimise disturbance during the catching process, reducing light levels to lessen stress, and the correct handling of chickens in crates, but there appears to be no minimum standard nor example indicator which encapsulates the points made in this discussion.	Noted Agree, section changed and information added
	33	More stringent control of catching, loading and transport is recommended (based on scientific research).	Noted
	36	Supports the inclusion of catching, loading and transport in the Code. These activities	Noted

		are integral elements of the vertically integrated meat chicken industry in New Zealand and their inclusion in this Code rather than in a separate Code of Welfare is appropriate.	
	39	The minimum standards in the Code allow practices that cause injury and acute distress to birds during collection, transport and slaughter – for example picking up and holding more than one bird at a time, which leads to leg strain and breakages. The Code should specify exactly how birds ought to be handled in order that they are not injured or subjected to pain and acute distress during these processes.	Disagree, though MS added
MS11	21	a) This should state that only one chicken should be held per hand, as otherwise there would be a high chance a chicken could get injured. b) How can it be ascertained that people will kill injured chickens humanely? Suggest chickens that look injured should be brought to a vet for check-up instead. If injuries are serious, then the chickens could be destroyed humanely. It should be stated how to kill them humanely. f) Crates should be at least 50cm high instead of 21cm, as chickens would not have enough space to move. A lot of chickens exceed the average height of the cages and hence confinement could cause injury.	Disagree, though MS added Disagree Disagree, though wording changed in EI
	24	The catching and handling of chickens without causing them injury or stress requires skill. It should only be undertaken by competent persons, i.e. those who have been appropriately trained to the task. Responsibility for the management of the operation should be clearly allocated, and high standards must be applied irrespective of the potential economic value of the chickens. Panic among the chickens and subsequent injury should be avoided. Catching should take place in low or blue light to minimise fear responses. Catching and handling should be carried out quietly and confidently exercising care to avoid unnecessary struggling which could bruise or otherwise injure the chickens. Unless they are caught and carried around the body (using both hands to hold the wings against the body), chickens should be caught and carried by both legs. No catcher should carry by the legs more than three chickens (or two adult breeding chickens) in each hand. Chickens must not be carried by the wings or by the neck. One possible way of avoiding the potential for damage to the chickens is to collect the chickens mechanically; only devices proven to be humane should be considered for use in gathering chickens. The distance chickens have to be carried should be minimised by taking the crates and containers into the house. Density in the crates should be adjusted according to weather conditions and size of bird. It is important to ensure that once chickens are loaded in the container they are not exposed to extremes of temperature. Crates or containers should be suitable for the purpose of transporting chickens and allow them easily to be put in, conveyed and taken out without injury. They should in particular be protected from rain and road spray which greatly increases the effect of wind chill, although effective ventilation must be maintained. Journeys should be carefully planned so that chickens are not left on the vehicle for long	Agree Noted Disagree, though MS added Agree, new section and MS added Agree, RBP added Disagree Noted, covered by transport within NZ code Noted, covered by transport

		<p>periods either at the start of the journey or at their destination. The provision of adequate ventilation and protection from adverse weather and extremes of temperature are essential during loading and transport.</p> <p>Measures should be taken to ensure efficient removal of excess heat and water vapour. It is important to make use of the natural airflow patterns around a moving vehicle to optimise conditions for the chickens during transport. However, when a vehicle is stationary for any length of time, mechanical ventilation may be necessary to maintain acceptable levels of temperature and humidity. When this is the case it is more effective to extract air from the vehicle than to blow air into it.</p>	<p>within NZ code</p> <p>Noted, already a MS</p>
25	<p>Furthermore we feel that the size requirements stipulated for broiler chicken transport crates are insufficient. The current Code has the minimum standard 13(f) "<i>Broiler chickens must be placed into the crates in such a way that they can rapidly obtain an upright position</i>". However this standard is omitted from the draft. At a minimum crate height of 21cm, we are concerned that a broiler chicken is unable to stand erect and we submit that the minimum height of such crates be at least 30cm. We see no point in attempting to maintain high animal welfare standards on farm, only to then have the animals transported in inhumane conditions.</p> <p>MS11 should be amended to read: (f) Chicken transport crates must have a minimum height of at least 30 cm. MS#11 should have the following clauses added:</p> <p>(l) The maximum number of broiler chickens that may be carried at any one time in each hand of a catcher must be no more than four. (m) The broiler chickens about to be carried to the crates must all be held with their hocks and shanks aligned in the same manner within the hand. (n) Crate density, crate size and the time at which food is withdrawn must be documented and these records kept on site for a period of no less than 6 months for auditing purposes. Training records must also be kept on site for the length of term of each employee.</p>	<p>Agree, wording changed</p> <p>Disagree, though wording changed in EI</p> <p>Agree, MS added</p> <p>Disagree</p> <p>Disagree</p>	
30	<p>MS11 contains no requirement to keep the temperatures experienced by the broilers in transit within a tolerable range. At the proposed density, especially in summer, there is very considerable potential for heat stress to occur.</p>	<p>Noted, covered by transport within NZ code</p>	
33	<p>The draft Code of Welfare acknowledges that these events are "innately stressful". Stress is involved when overworked, unskilled catchers, keeping to a minimum hourly catch rate, try to stuff chickens into small cages under humid, dusty, conditions. Stress is also involved when chickens are transported long distances in crowded hot conditions. Overseas, loose crates manually stuffed by workers have been replaced by modular systems. Birds are mechanically swept into cages and these are then placed straight onto transport trucks. These have been found to reduce stress. (references provided) Recommends that these systems be introduced in New Zealand, after a sufficient phase-in time.</p>	<p>Noted</p> <p>Disagree, though RBP added</p>	

		<p>For road transport the main welfare issue is thermal stress, particularly heat stress. This can be alleviated by stipulating the same control over temperature and humidity in transport vehicles as required in broiler houses.</p> <p>Recommends that the following additions be made to MS11:</p> <p>l) From 1 November 2011 all operators must use automatic catching equipment ad modular transport systems.</p> <p>m) Temperature and humidity must be monitored continuously on transport vehicles.</p> <p>n) Temperature and humidity on transport vehicles must be adjusted so that the Apparent Equivalent Temperature (AET) does not rise above 40°C and the dry bulb temperature is greater than 10°C.</p>	<p>Noted, covered by transport within NZ code</p> <p>Disagree, though RBP added</p> <p>Disagree, covered by transport within NZ code covered by transport within NZ code</p>
	36	Supports MS.	Noted
Example indicators	25	Commercial farm operators should be mandated to keep clear records of critical areas of their operation for audit purposes if and when required. We therefore submit that the example indicator points 2 through 6 should be incorporated into a minimum standard.	Disagree
	36	Supports Example Indictors.	Noted
7. Disease and Injury Control			
General comments	3	Impose limits on selective breeding for growth. The current growth rates of broilers cause severe leg injuries including lameness, tibial dyschondroplasia, and ruptured tendons, and may cause metabolic disorders such as ascites and sudden death syndrome. (references provided)	Agree, RBP and GI added
	4,5,6,8,9,10,11,12,15,17,18,19,22,23,31,32	The industry breeding a strain of bird that is genetically flawed and suffers as a result should no longer be tolerated.	Agree, RBP and GI added
	25	<p>We note that in the draft Code there is no mention of the use of antibiotics in broiler chicken production. In the current Code it is stated in minimum standard 10(d) that <i>“Medication must only be used in accordance with registration condition, manufacturers’ instructions or professional advice”</i>. We are of the opinion that the overuse of antibiotics in broiler chicken production is a severe animal welfare issue and concur with the RNZSPCA statement in their 2001 submission that: “No other industry routinely feeds antibiotics to its animals. It is a well-known fact that antibiotics are primarily used in the broiler industry as growth promotants, rather than for their disease-preventing abilities. Feeding these antibiotics accelerates the broiler’s already unnatural fast growth even further and thereby increases welfare problems such as leg weakness and heart disease.”</p> <p>Furthermore, it appears to us that the section on Disease and Injury Control has regressed in standard from that of the current Code. Minimum standard 10(a) in the draft is too broad in its meaning and may allow for poor management practices to occur. In farms containing very large numbers of animals we feel it must be clearly laid out as to how the animals’ health and well-being are monitored. This helps to prevent lax work practices creeping in over time. We feel that sections (f) and (g) of the current Code are</p>	Noted

		far better insofar as they clearly state what actions are required of an operator to meet minimum animal welfare standards. We also feel strongly that dead birds and culls must be removed daily and that the numbers of these animals are recorded and the records kept on site.	Disagree, though wording changed Disagree, though EI added
	28,29	The selective breeding practices employed with these birds have resulted in extremely unhealthy birds with numerous physical weaknesses. Please outlaw these breeding practices which have produced chickens with bone defects, deformities, weaknesses in hips and legs caused by overweight birds bred for accelerated growth. As a result, their movement is grossly impaired and they often do not have the strength to stand. These conditions are the hallmarks of substandard care and attention being paid to the health and welfare of these chickens.	Disagree, though RBP and GI added
	31	Understands this topic is to be addressed in a separate Code and urges NAWAC to give this the high priority it deserves.	Noted, Broiler Breeders code in preparation.
	33	It is disturbing that the single biggest factor in poor welfare, the fast growing broiler strains, is not even mentioned in the draft Code of Welfare, but being left for a hypothetical future Code for broiler breeders. This appears to be a deliberate obfuscation, consistent with earlier government studies that have continually underplayed the suffering inherent in intensive farming of broilers. Provide facts and references for the link between fast growing broilers designed to maximise production at any cost and poor welfare and usage of slow-growing broilers in Europe. The draft Code of Welfare states that broiler breeding companies are "actively working to improve broiler leg and cardiovascular health". No evidence is provided for this assertion, and available evidence does not suggest we can have much confidence that this is the case. The poultry industry in New Zealand is in denial about the link between genotype and leg health, instead insisting, contrary to all available evidence, that New Zealand is a "world leader in meat chicken welfare standards". (references provided in submission)	Disagree, though RBP and GI added
	34,38	Strict measures must be introduced to ensure that the unsustainable, genetically inferior strain of chicken so many 'farms' produce, is eliminated. It is completely unjustifiable to continue breeding such seriously damaged and weakened birds.	Disagree, though RBP and GI added
	36	Supports the proposal to address genetic selection and breeding issues in a separate breeder Code of Welfare. Notes the improvement on a range of welfare indicators achieved by breeding companies over recent years. Leg gait scoring as a welfare indicator is a subject of debate and scientists continue to refine the measurement tools. However a comparison of legal gait measurement and leg culls data between New Zealand and overseas countries such as the UK show that leg health is superior in New Zealand to overseas countries.	Disagree, and RBP and GI added
	37	The practice of breeding for maximum meat production should be curtailed by certain limits. Animals should not be bred so that they cannot walk because of the weight of their own bodies nor should they be 'modified' so that they cannot walk or use their beaks or flap their wings, which are all natural behaviours and methods for communication.	Agree, RBP and GI added
MS12	24	In order to reduce the risk of welfare problems developing on broiler chicken units, it is	Disagree

		<p>recommended that a systematic inspection of all flocks should be undertaken at least twice each day at appropriate intervals. Young chickens, in the first few days of life, should be inspected more frequently. Give suggestions on best way to undertake inspections to get the clearest possible picture of animal health and wellbeing.</p> <p>A health and welfare programme should be implemented for each unit which sets out health and husbandry activities covering the whole of the production cycle. It should also establish management procedures and control measures to reduce the risk of infections and injury. This will normally include an effective vaccination protocol (which should be carefully monitored to ensure efficacy) to reduce the risk of disease outbreaks. The health and welfare programme should be developed with appropriate veterinary advice, reviewed against performance and updated accordingly. (Provide important indications of good health.)</p> <p>Measures to control diseases caused by external parasites should be taken by using the appropriate parasiticides. Should the flock-keeper decide that there is a good chance of a sick bird recovering, it should be isolated in a hospital pen, providing it is able to eat, drink and stand unassisted. Chickens should be examined frequently throughout the day. However, if a bird is suffering and cannot be treated or if it fails to show significant improvement within 24 hours of being placed in the hospital pen, it should be humanely killed without delay.</p> <p>All those in contact with chickens should practice strict hygiene and disinfection procedures. Where possible the site should be managed so that all houses are empty simultaneously to facilitate effective cleaning, disinfection and disinfestation. When houses are emptied and cleaned, old litter should be removed from the site before restocking so as to reduce the risk of the carryover of disease.</p> <p>All chickens should be monitored for signs of lameness, leg weakness or abnormal gait on a daily basis. Any bird which is unable to move about freely and find feed and water must be humanely killed as soon as it is detected unless it can be treated and is likely to recover without unnecessary suffering.</p> <p>Management measures should be taken to prevent lameness, having regard to previous experience on the farm and recognised best practice.</p>	<p>Disagree, though RBP added</p> <p>Noted</p> <p>Noted</p> <p>Agree, wording changed</p> <p>Agree, wording changed</p>
	25	<p>MS#12 should be re-worded to the following:</p> <p>(a) A detailed inspection of the flock in each broiler shed must be undertaken at least once per day. To achieve this the owner, or person in charge, must walk up and down the total length of the broiler shed between each drinker and feeder line and external walls.</p> <p>MS#12 should have the following additional clauses added:</p> <p>(d) Broiler sheds must be viewed or inspected a further four times daily during which broiler chicken behaviour, temperature, light levels, availability of feed, feeding systems, water and all air vents must be checked, and if required, appropriate remedial action</p>	<p>Disagree</p> <p>Disagree</p>

		<p>must be taken to protect the welfare of broiler chickens.</p> <p>(e) Medication (including antibiotics) must be used only in accordance with registration conditions, manufacturers' instructions or professional advice, and only in response to a perceived or confirmed outbreak of a disease.</p> <p>(f) Dead birds and culls must be removed daily and numbers must be recorded and kept on site for a period of no less than 6 months for auditing purposes.</p>	<p>Agree, MS added</p> <p>Disagree, though EI added</p>
	33	<p>Broad agreement with MS12.</p> <p>Should add new MS:</p> <p>From 1 November 2011, slow growing breeds that require a slaughter age of no less than 81 days must be used.</p>	<p>Noted</p> <p>Disagree, though RBP and GI added</p>
	36	Supports MS.	Noted
Example indicators	33	Commends the Example Indicators and requests that these be incorporated into MS12.	Disagree
	36	Supports Example Indicator.	Noted
RBP	33	Commends RBP and requests that these be incorporated into MS12.	Disagree
Section 7.1, Humane destruction			
General comments	25	<p>The killing of any animal is a process that we believe must be carried out to the highest welfare standards possible. In large scale farms, the euthanasia of unhealthy or sick animals, especially when carried out in large numbers in an emergency, carries with it the risk of inhumane killing due to such problems as over confidence in ability or insufficient training. We believe it to be imperative that this critical process is controlled closely by clear and precise minimum standards so as to minimise the level of unnecessary suffering that may occur. Even though relatively large numbers of animals may have to be humanely killed in broiler chicken farms, the AWA stipulates in Section 12 (c) that it is an offence "For any person to kill an animal in such a manner that the animal suffers unreasonable or unnecessary pain or distress".</p> <p>We submit that the entire process must be documented and records kept for auditing purposes, and that the term "...appropriate training..." be clarified so as to remove any doubt as to the competence of staff members to carry out this critical procedure. We also feel that, where gas is to be used, the example indicator be increased to a minimum standard, leaving no doubt as to what is required by operators.</p>	<p>Noted</p> <p>Disagree</p>
	26	<p>The USDA's Food Safety and Inspection Service show that in the United States around 2.8 million broiler chicks were boiled alive in defeathering tanks in 2002, having passed above the stunning baths and missed the blades at throat-cutting stations. In the United Kingdom up to 50 birds an hour are conscious when their throats are cut, and up to 9 in 1000 birds survive the blade and perish in scalding tanks. There is no reason to suppose the situation is any different in New Zealand if this method of slaughter is used.</p> <p>The Humane Slaughter Association in the UK has argued that chickens should be killed or rendered completely unconscious via gassing or stunning. While the Poultry Industry may be reluctant to employ electrocution as a means of humane slaughter (because of</p>	<p>Disagree, humane slaughter of poultry in NZ is covered by the Commercial Slaughter Code</p>

		possible bruises to carcasses caused by over-stunning), there are other modes of slaughter which are far more humane and which do not unduly compromise the quality of carcasses.	
	37	When slaughtering the broilers, there are currently extraordinarily cruel methods practised that terrify the birds before slaughter and cause undue stress and pain before finally killing them. I submit that new procedures and production line standards be introduced that would lessen the stress on the birds, and handling standards that cause the least pain or discomfort immediately before their deaths.	Noted, humane slaughter of poultry in NZ is covered by the Commercial Slaughter Code
Introduction	16	Proposes that 'electrical stunning' be eliminated from the list of acceptable methods of culling, because of the possibility of the animal still experiencing extreme distress, even though it cannot move. Refers to people who had strokes and those in a coma being aware of what is going on and being able to feel pain even though being unable move. Also proposes that in case of individual culling it should take place out of the view of any other chickens.	Disagree
MS13	24	Humane methods of euthanasia need to be further researched, with gas stunning as an alternative to electrical stunning compulsorily implemented. The replacement of paralytic electric shock equipment with gas-based technology that will kill the chickens in the transport crates prior to shackling, will spare the pain and stress of live shackling, electrical paralysis and neck cutting and being scalded alive for millions of chickens each year. (Provides evidence with references) More effective and less aversive alternatives to electrified water-bath stunning slaughter are Controlled Atmosphere Stunning (CAS) and Controlled Atmosphere Killing (CAK) systems. In these systems, animals are not handled while they are still conscious, avoiding the problems associated with dumping, handling, and shackling live chickens, and the systems do not risk pre-stun shocks and/or ineffective stunning. In CAS and CAK systems, chickens are conveyed through a tunnel filled with carbon dioxide (CO2), inert gases (argon or nitrogen), or a mixture of these gases. With CAK, chickens are exposed to lethal concentrations of gases long enough that they are actually killed, rather than simply stunned, whereas with CAS, the gas or gases induce unconsciousness as the chickens pass through before they are hung on shackles, while insensible, and conveyed to the killing machine for slaughter. In both systems, hanging operators do not shackle the chickens until after they exit the gas stunning system, so the animals do not endure the pain, fear, and stress associated with this step in the procedure, and there is no potential for pre-stun electric shock or chickens missing the stunner.	Disagree Noted, humane slaughter of poultry in NZ is covered by the Commercial Slaughter Code
	25	MS13 should have the following additional clauses added: (d) A register of training methods and evaluation for all staff who are to be part of the humane destruction process must be kept on site for the period of that persons employment for auditing purposes. (e) Euthanasia protocols must be documented and available on site at all times. (f) When humane destruction is performed by gassing, the mixture must be with 70%	Disagree Disagree Disagree

		CO2 or a mixture of 70% CO2 and 30% argon. (g) When using gas the procedure must be sufficient to ensure the collapse of every bird within 35 seconds of exposure to the gas. Birds must remain in the gas for at least a further four minutes following collapse and, upon removal from the gas, must be inspected to ensure that they are dead.	Agree, MS added
	26	Chicken meat suppliers in Pennsylvania and California are switching from stunning and throat cutting to controlled atmospheric killing (CAK). CAK is a far less cruel slaughter method that renders birds unconscious before they are even removed from transport crates. This practice does not harm carcasses unduly, is safe for consumers, and avoids the problems of missed birds associated with the method of electrical stunning followed by neck dislocation. MS13 – Humane Destruction should advocate the most humane method of slaughter – ie CAK. Any method which is known to result in the unnecessary suffering of chicks during slaughter - because they have avoided stunning or neck dislocation – should not be listed under a Minimum Standard for chicken welfare at slaughter. Any method which <i>does not ensure</i> total lack of consciousness at time of death can not be classified as humane. All measures should be taken by the NZ broiler industry to ensure the rapid and humane deaths of meat chicks.	Noted, humane slaughter of poultry in NZ is covered by the Commercial Slaughter Code
	33	Recommend a consequential amendment below: b) People undertaking humane destruction must be appropriately trained as specified in MS1, and must ensure that birds are handled gently and calmly at all stages of the process.	Agree, MS added
	36	Supports MS.	Noted
Example indicators	33	Requests that the Example Indicators be incorporated into the MS13.	Disagree
	36	Supports Example Indicators.	Noted
	40	Point 2 (iii): 'a mixture of _70%..' should be ' a mixture of 70%..'.	Agree, change made
8. Hatchery Management and Chick Transport			
General comments	25	We have similar concerns regarding this portion of the draft Code as for the “general” humane destruction section number 13. These are: that the term “...appropriately trained...” is too ambiguous; that the records of training etc are not required to be kept on site; and that the method of usage of gas, when and where it is used, is not stipulated. We also find it concerning that there is seen to be a need for such phrases as: “ <i>Appropriate action is taken when mishandling of chicks occurs</i> ”, as this indicates that in this particular area of broiler chicken farm management there is an abnormally high level of “mishandling”. We sincerely hope that NAWAC and the Ministry are addressing any such issues when and where needed, and once again feel the need for a certified training scheme or similar for all staff involved in the industry.	Agree, indicator reworded
Introduction	16	Is appalled by instantaneous fragmentation. Can accept this for un-hatched eggs, but	Noted

		never for chicks.	
MS14	24	For hatchery enterprises, all areas should be cleaned and sanitised in accordance with protocols. Appropriate measures must be in place to verify the effectiveness of the cleaning/sanitation protocols. Chicks should always be killed by a skilled operator, and placed in the highest obtainable concentration of carbon dioxide, supplied by a source of 100% carbon dioxide. When chicks are exposed to gas mixtures, they must remain in the gas mixture until dead. The capacity of any mechanical apparatus must be sufficient to ensure that chicks and embryos are killed instantaneously. When using carbon dioxide or gas mixtures, the operator should check thoroughly to ensure that all chicks are dead. When using any of the permitted gas mixtures it is essential that the levels of each gas are monitored and maintained as any build up in the oxygen content will significantly reduce the effectiveness of the system and is likely to result in chickens taking longer to die or possibly regaining consciousness. The rate of delivery of chicks should be such as to ensure that chicks are not crushed or suffocated during exposure to gas mixtures or when passing through a mechanical apparatus.	Disagree Disagree
	25	MS14 should have the following clauses added: (h) A register of training methods and evaluation for all staff who are to be part of the humane destruction process must be kept on site for the period of that persons employment for auditing purposes. (i) Euthanasia protocols must be documented and available on site at all times. (j) When humane destruction is performed by gassing, the mixture must be with 70% CO2 or a mixture of 70% CO2 and 30% argon. (k) When using gas the procedure must be sufficient to ensure the collapse of every bird within 35 seconds of exposure in the gas. Birds must remain in the gas for at least a further four minutes following collapse and, upon removal from the gas, must be inspected to ensure that they are dead.	Disagree Disagree Disagree Agree, MS added
	36	MS14 (d) Submits that the word " <i>euthanase</i> " is more appropriate than " <i>destroy</i> ".	Agree, wording changed
Example indicators	33	Requests that Example Indicators be incorporated into MS 14.	Disagree
	36	7 th point: Submits that more detail is required as to what is incorporated in a written contingency plan to give better guidance for hatcheries. Last point: Submits that the word " <i>collapse</i> " should be replaced by either "loss of consciousness" or "anaesthesia" or "the onset of the effects of the gas".	Disagree, but new section and MS 5 added Disagree, though now a MS
9. Quality Management			
General comments	25	We believe that it should be standard practice for all broiler chicken farms and facilities to have an animal welfare quality assurance system in place. A new Minimum Standard (Quality Assurance Systems) should be created which reads:	Disagree

		<p>(a) To help ensure that standards of animal welfare and husbandry are maintained, each commercial broiler chicken facility must implement a quality assurance system that provides for written procedures.</p> <p>(b) The elements of the quality assurance system must provide for the minimum standards and relevant indicators, and recommendations for best practice of this Code.</p> <p>(c) The quality assurance system must require continual review of existing systems and procedures that could enhance the welfare of broiler chickens.</p> <p>(d) The quality assurance system must provide for all incidents resulting in significant sickness, injury or death of birds to be fully investigated and documented. Where the results of an investigation may have implications for current industry management practices, a report outlining the incident and implications must, as soon as it is available, be forwarded to the appropriate industry body for consideration.</p>	
	36	Supports the concept of the quality assurance systems. Such systems are an integral part of the operations of our member companies.	Noted
RBP	33	Requests that the Recommended Best Practices be incorporated into a new MS.	Disagree
	35	Request that recognition of the benefits of formal training is added to the last sentence of RBP (c) on page 28 by amending it to read: (c): "...workshops, industry newsletters, and formal training (where appropriate).	Agree, wording amended in GI
Appendix I	36	PIANZ supports the Interpretations and Definitions contained in Appendix I.	Noted
Appendix II	36	PIANZ notes the legislative requirements under Appendix II and supports those legislative requirements.	Noted
Appendix III	36	PIANZ notes the legislative requirements under Appendix III and supports those legislative requirements.	Noted

Responses to NAWAC's questions

Question	Sub No.	Comment
Question 1		<i>Do you consider a code of welfare for broiler chickens to be necessary? Are there any alternatives which would achieve the same outcome as having a code of welfare? If so what are they?</i>
	16	Yes, I definitely consider a Code of Welfare for broiler chickens to be necessary. Without it, the only goal will be lower prices, and chicken farmers using more humane methods will not be able to compete against chicken farmers who are focused on money only. A negative spiral of less and less consideration for the welfare of the chickens would be the inevitable result. I see no alternative which would achieve the same outcomes as having a Code of Welfare.
	30	I certainly consider that the industry needs some form of independent welfare regulation. I think it is unlikely that self-regulation would achieve a standard of welfare which the public would consider acceptable. At least as regards indoor broiler factory farming, the sequestered nature of the industry increases the need for some independent regulatory agent to represent the public by imposing and enforcing standards of welfare which are acceptable to the public. Whether this draft Code achieves that purpose, however, or indeed achieves anything other than exempting broiler farmers from the more inconvenient requirements of the Animal Welfare Act, is another question. In the absence of a Code, standards of welfare for broiler chickens could presumably be determined over time by case law as prosecutions of offences under the Animal Welfare Act are brought to court by MAF or SPCA officers. However this is likely to be a slow process, especially given the level of resourcing available to bring such cases before the courts and the exclusion of the public from observing broiler farming practices. A 'carrot' approach could involve commercial incentives being made available to farms which meet higher welfare standards.
	36	Supports a Code of Welfare for broiler chickens and does not believe an alternative would achieve the same outcome.
Question 2		<i>Do you agree that the minimum standards in this code are the minimum necessary to ensure that the physical, health, and behavioural needs of broiler chickens will be met? For example, do the minimum standards reflect good practice (not just current practice), current scientific knowledge and available technology? If not, what alternatives do you suggest?</i>
	16	No. In some cases, I do not agree that the minimum standards in this Code are the minimum necessary to ensure that the physical, health and behavioural needs of broiler chickens will be met.
	30	No; I think that minimum standards requiring environmental enrichment and adequate outdoor shade and shelter on free-range farms need to be added, and the maximum stocking density significantly reduced, to achieve the status of 'minimum necessary to ensure that the physical, health, and behavioural needs of broiler chickens will be met'. Many of the proposed minimum standards are simply statements of common sense, dictated at least as much by considerations of productivity and profit as by welfare concerns. Once again these standards represent a shift away from the more prescriptive approach of the last Code, and the reasons for this change and how it fits with the stated intention of the Animal Welfare Act that the Codes should provide the detail and baselines for animal management and care in New Zealand guided by the provisions of the main legislation, remain unexplained. While a very high level of specificity makes for an unwieldy regulatory document unable to accommodate new research findings or change in public attitudes, there is a real risk that insufficiency of detail will disadvantage the animal welfare cause. The less prescriptive the standards are, the greater the potential for animal welfare abuses to be perpetuated while opposing parties seek legal definition of what constitutes compliance with a relatively loosely defined welfare outcome. The outcome of any legal challenge relating to the compliance of a particular broiler chicken operation with particular minimum standards may have more to do with who can afford the best legal representation than with points of animal welfare. Further, the implicit understanding that the precise details of what constitutes compliance with a minimum standard can be defined later on an as-required basis, disempowers the public for whom this Code of Welfare submission process represents the only formal opportunity for involvement in determining standards of animal welfare in New Zealand.

But question 2 assumes that if we get it right with the minimum standards, then these will ensure that the physical, health, and behavioural needs of broiler chickens will be met. A larger question around the adequacy of the standards is not their format or indeed their content but the likely level of compliance and/or efficacy of any sort of enforcement. How will these welfare outcomes be assured? For example, the stockmanship standard requires that: 'Broiler chickens must be cared for by personnel, who collectively possess the ability, knowledge and competence necessary to maintain the health and welfare of the animals in accordance with this Code' and include as example indicators:

- A copy of the minimum standards is available on site at all times
- Job descriptions and/or other documentation outlining the expectations of personnel and their performance are readily accessible
- All staff have received training and demonstrate competence by appropriate responses to birds and their needs'

What formal systems will ensure that all this happens, and how transparent will be this process?
An example indicator for minimum standard 2 states:
'If the mortality level within a shed is in excess of 1% in a 24 hour period, an investigation is undertaken'
Who will carry out this investigation? Will it be written up? Who see the report? Is there also a requirement to act on the findings of the investigation, and within what time frame? How will anyone external to the operation know whether any of this is done or not?
The draft Code contains many such examples of what appear to be completely unenforceable requirements.
There are only five fulltime MAF Animal Welfare Investigators, and despite the capacity to call in other agencies and casual staff for support where required, it is difficult to see how sufficiently regular inspections for compliance with the Code can be resourced and the standards enforced. Furthermore, the Code requires almost no self-monitoring and no submission of data or reports to MAF as the primary agency administering the Animal Welfare Act in the context of commercial farming. MAF acknowledges in its Statement of Intent 2009-2010 document that its programmes (the Codes of animal welfare are specifically mentioned) rely upon high levels of voluntary compliance and participation. As noted earlier, the nature of, especially, broiler farming in sheds means that the public is unable to observe and report suspected breaches of animal welfare standards to the appropriate authorities than is the case with animals farmed outdoors. (Indeed, minimum standard 4a confers a welfare imperative status upon the prevention of any observation of broiler farming operations). Other than illegal break-ins, the public must rely solely on MAF in its capacity as regulatory administrator to ensure that the welfare standards which this submission process invites us to have a hand in shaping are being/will be achieved. A description of how this happens or will happen would have been a useful accompaniment to the draft Code, but would still be an enlightening component of the post-submission discussion document or final Code preamble. A legal requirement to collect, collate and interpret data, and to submit reports on a regular and defined basis to MAF for some form of auditing would increase the likelihood of on-going self review by broiler shed owners and generally have the effect of raising husbandry standards. (Without a minimum standard requirement to do this, compliance with example indicators, or best practice suggestions to undertake such planning and record keeping is likely to be low at best).
In my previous employment in local government, proposed regulations had to be assessed as to how well they complied with the 'SIDEM' test – i.e. to what extent were they specific, implementable, defensible, enforceable and measurable? To be much more than a PR exercise, or at best an educational tool, regulatory standards must measure up to these criteria. Those parts of, or omissions, from the minimum standards which are not considered to reflect good practice, current scientific knowledge and available technology are discussed above. But as a general comment it is difficult to gauge whether the minimum standards reflect current scientific knowledge because the draft Code does not contain any referenced review of the relevant scientific literature which would enable the public to assess the extent to which the recommendations of the draft are evidence-based.
NAWAC Guideline 05 (Role of science in setting animal welfare standards) states that science makes a central contribution to promoting good animal welfare, and that this is recognised in the Animal Welfare Act 1999. 'Science plays a major role when NAWAC considers minimum standards and recommendations for best practice. Scientific knowledge and the scientific method in terms of its rigour and objectivity of evaluation, including critical peer review, are both employed.' Science is therefore expected to

		play a major part when NAWAC seeks to define animal welfare standards. This is not evident in this draft Code, as it has not been in many others. Reference to technological options in the discussion or the standards is minimal. Some alternatives or other recommendations relating to the minimum standards have been addressed in separate sections above. In general, as a broad 'alternative' approach, it is once again suggested that NAWAC make the process by which a Code is written, and the research and assumptions upon which it is based, much more transparent.
	36	The Minimum Standards do reflect good practice, current credible and valid scientific knowledge and available technology.
Question 3		<i>Do you agree the example indicators given are appropriate to describe how to measure or assess the achievement of the intended outcome of the minimum standards? If not, what alternative(s) do you suggest?</i>
	16	Yes
	30	Most of the example indicators appear generally reasonable. However undefined terms like 'appropriate', 'undue' and 'minimal' are over-used. As with the minimum standards, achievement of many of the indicators will be impossible to verify. For example, the example indicators of minimum standard 4 – Housing and Equipment – require that: <ul style="list-style-type: none"> • Bird distribution and behaviour is monitored during daily inspections and corrective action is taken as required • The operation of equipment is monitored at least four times each day • If bird health and welfare is compromised by equipment failure then corrective action is taken and documented' It is not clear how compliance with minimum standard 4 based on these indicators will be assessed.
	36	Where appropriate there are suggested amendments to Example Indicators to measure the achievement of the intended outcome of the Minimum Standards.
Question 4		<i>Do you agree that the recommendations for best practice in this code are appropriate? If not, what alternatives do you suggest?</i>
	16	No. In the same areas I mentioned above for Question 2 and for the same reasons.
	30	There are not many recommended best practices in this draft Code. Because presumably the measures listed as recommendations for best practice are considered achievable rather than representing any sort of unattainable ideal, then as a general comment the more that can reasonably be included in the minimum standards, since these are the only sections of the Code to have legal effect, the better. In particular, the recommended best practice for minimum standard 10 should be a minimum standard (as should a shade and shelter provision in minimum standard 3, and a temperature provision in minimum standard 11).
	36	Agrees the Recommended Best Practice in the Code are appropriate.
Question 5		<i>Do you think this code would change existing arrangements for the management of broiler chickens? If so, how, and to what extent?</i>
	16	I do not know the answer to this. I expect that this Code would greatly improve the lives of many broiler chickens, but I am not in a position to say for sure.
	30	Given that the existing Code of Welfare for broiler chickens was produced in 2003, this proposed Code will presumably change existing arrangements for the management of broiler chickens to the extent that the minimum standards of the new draft differ from those contained in the 2003 Code. <i>Redacted</i> letter accompanying the draft identifies key changes as the coverage of free range broiler chickens, requirements for addressing behavioural needs, and revision of the minimum standards in terms of animal welfare outcomes that must be met, with suggested indicators to give guidance on how to meet the minimum standards. Otherwise the two Codes are very similar.
	36	The Code will change existing arrangements, but they reflect the current standards of management of chickens in New Zealand.
Question 6		<i>Will complying with this code involve costs for you or your business? For example, costs may include converting existing animal facilities or employing new staff.</i>

	16	No, as I am not a broiler chicken business. Of course complying with new Codes ALWAYS involves increased costs, so why bother asking such a question? And why the focus on costs to the producer? Where is the question about how we think complying with the Code will increase the welfare of the chickens? I would like to see more focus on this aspect of the Code, please.
	30	I believe that the coverage of free range broilers by the new Code could potentially promote this mode of farming by making the superior welfare arrangements of free range farms explicit. The behavioural need standard is considered insufficient to lead to any change in existing arrangements for the management of broiler chickens, and unworkable in conjunction with the proposed maximum stocking density. I have discussed my concerns about the potential welfare risks associated with the revision in question 2 above.
	36	All change will see some level of cost, but industry will make all changes necessary to meet the standards.
Question 7		<i>What barriers do you see to the implementation of the proposed code and how might they be resolved?</i>
	16	I see as a barrier to implementation a shortage of inspectors and low fines for non-compliance. These barriers could be resolved by having volunteer inspectors trained from animal rights groups to document the conditions at the farms.
	30	The primary barrier to the implementation of the proposed Code is considered likely to be one of compliance and enforcement (discussed in response to question 2 above).
	36	The industry sees limited barriers to implementation of the Code as drafted.
Question 8		<i>What benefits do you see from having this code? Benefits may include, for example, increased certainty about animal welfare requirements or market gains.</i>
	16	This Code discusses issues which most consumers would rather not know about, so this Code sheds light on the dark and purposely hidden standard practices of factory farming. Practises such as keeping animals in semi darkness their entire lives, not even experiencing any natural light. And the accepted practice of 'instantaneous fragmentation', for example. How can a method like that possibly be considered humane?
	30	I think there may be some benefit in the Code prescribing the minimum animal welfare advantages of the free range system. There are no other discernible benefits to the animals - no protections afforded which surpass those of the main Act, and the Code contains a number of provisions permitting practices which are unlikely to be considered acceptable under the Act – notably, intense crowding, permanent indoor confinement in an homogenous low stimulation environment, confinement for transportation at a very high density, exposure to unnatural light patterns to maximise feeding, and potentially, exposure to relatively high levels of heat, humidity, dust and noxious gases. The Code exempts broiler farmers from having to meet the higher tests of the Act.
	36	The industry see benefits from the Code as it gives certainty to farmers, processors, consumers and regulators.
Question 9		<i>What other impacts would this code have on New Zealand society, the economy, or the environment?</i>
	16	Allowing anything other than free range methods will only increase the darkness in the world, as well as disease and suffering of both the animals and the humans who eat them. Concentrated raising of any animal is harmful to the environment. The smell from the chicken barns and fly problems will make life miserable for the families who are anywhere nearby. The concentrated waste will cause water pollution, which will affect fish and anyone downstream, and possibly groundwater contamination. Working in these barns is bad for the mental and physical health of the workers as well as the chickens.
	30	No cost analysis was produced in conjunction with the draft Code which would give an indication of the implications to the economy and to the purchasers of chicken meat if higher welfare standards were to be required for broiler farming. Intensive farming operations always present difficult and expensive environmental challenges in terms of treating and disposing of wastes in a way which does not cause significant degradation of their catchments' waterways.
	36	The Code strikes an appropriate balance between society, the economy and the environment.