

# Australian Chicken Growers' Council Limited

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Submission on the Land Transport of Livestock Regulatory Impact Statement

Dear Sir/Madam

Thank you on behalf of the Australian Chicken Growers' Council (ACGC) for the opportunity to make a submission on the Regulatory Impact Statement. ACGC represents the interests of some 800 contract meat chicken growers in Australia at a national level through six state organisations. Contract meat chicken growers as part of the vertically integrated value chain of chicken meat production in Australia are responsible for approximately 45-50% of the capital investment in the industry. As contractors, meat chicken growers are responsible for rearing the birds from day-old to market age but at no time do they assume ownership of the birds. All the responsibility for arranging pick up and transporting the birds to processing rests with the owner of the birds who is normally the processor.

While we believe that in terms of the contents of the standards and guidelines for poultry the policy objective ie "*to ensure that the conditions under which livestock are transported on land are consistent with reasonable animal welfare objectives*" has been generally met..there are two matters we would comment on.

The first relates to the issue of who assumes responsibility and the second to a specific statement in the poultry standards; SB10.8. In relation to the first point it would be useful if consideration could be given to recognising the relationships that exist in the commercial arrangements that exist between processor and grower. The second relates to the inclusion of SB10.8 which *states that electric prodders must not be used on poultry*. The inclusion of this item is inappropriate as electric prodders are not used and this statement gives the impression that electric prodders have been used and are now banned.

There are a few issues in Appendix 8 "*Unresolved issues*" that we would like to comment on.

1. Appropriate interpretation of the standards and guidelines.

We would agree that the guidelines should not be used to provide compliance specification for the standard and also there is a role for standards that are general and nonspecific to provide a background.

2. Definition of welfare risk.

We would agree that the Standards' should be about the prevention of breaches of the welfare of animals in care.

We would be happy to have the opportunity to discuss any of these issues in more detail.

Gary Sansom

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