



**GUIDE TO THE  
REGULATION IMPACT STATEMENT  
ON THE  
AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES  
POULTRY  
Nov 2017**

An extensive 90 day public consultation process is underway on the draft Australian Animal Welfare Standards and Guidelines for Poultry and the associated Regulation Impact Statement (RIS).

The preparation of a RIS is an important part of the public consultation process to assess the proposed standards, and evaluate the costs resulting from changes to existing requirements.

A RIS for draft poultry standards and guidelines, along with the proposed standards and guidelines, has been released for comment.

The proposed draft national standards and guidelines for poultry welfare are part of a national effort to deliver clear, consistent and contemporary welfare standards that will enhance welfare arrangements for poultry industries across Australia.

Australia's existing model codes for the welfare of domestic poultry are now 15 years old. Those for ostriches are 14 years old and those for emus are 11 years old. These codes have not kept pace with community and trading partner expectations, and are not mandatory. It is intended that the proposed standards, if adopted, will replace the existing Model Code of Practice for the Welfare of Animals – Domestic Poultry 4th edition (2002), plus equivalent Model Codes of Practice for welfare of poultry at slaughtering establishments, the farming of ostriches and of captive bred emus ('the existing MCOPs').

The poultry standards and guidelines document aims to:

- Specify the legal *standards* of management and husbandry required to protect and maintain the welfare of poultry in Australia. The poultry standards are to be regulated in law by State and Territory governments.
- Provide recommended *guidelines* for livestock producers, owners, managers, stockpersons, agents and contractors, to complement the standards and to assist them to minimise risks to the welfare of poultry in all types of poultry farming and related enterprises. Non-compliance with one or more guidelines will not in itself constitute an offence under law.

The RIS includes a list of questions, which can be found here <http://www.animalwelfarestandards.net.au/poultry/poultry-public-consultation/> (or alternatively in the RIS after the RIS summary). Answering questions included in the RIS is optional when making a submission.

Written submissions on the poultry standards and on the RIS should be emailed to [publicconspoultry@animalhealthaustralia.com.au](mailto:publicconspoultry@animalhealthaustralia.com.au)

More information on the poultry standards, development process and the consultation is available at the following website: <http://www.animalwelfarestandards.net.au/poultry/>

## Commonly asked questions and answers on the RIS

### ***What is a Regulation Impact Statement?***

A Regulation Impact Statement (RIS) is a document required by the Council of Australian Governments (COAG) to accompany regulatory proposals, including the proposed Australian Animal Welfare Standards and Guidelines for Poultry.

The broad aim of the RIS process is to ensure that the costs of regulatory proposals are justified by their benefits. The purpose of issuing a draft RIS for public consultation is to canvass the regulatory options under consideration, and the relative costs and benefits of those options. It is also important to ensure that proposals will achieve their intended objective without unduly causing adverse effects.

A RIS is prepared for the purpose of consulting with interested parties. It incorporates all formal elements of a RIS prepared for COAG, including a full cost benefit analysis. Interested parties are invited to comment on any aspect of the RIS. For example, interested parties could provide comment on whether the description of the problem captures the essence of the issues or to suggest other options that are viable that can address the problem. Interested parties are particularly encouraged to comment on the impacts of the options – both the costs and the benefits – and how the regulatory proposal will work in practice. A summary of comments on the RIS will be included in a final RIS for the information of decision-makers.

A RIS is required for the draft poultry standards (but not guidelines), because only the draft poultry standards are being proposed to be regulated by law.

If you want to know more about Regulatory Impact Statements visit:

- <https://cuttingredtape.gov.au/handbook/most-commonly-asked-questions>
- <https://pmc.gov.au/resource-centre/regulation/user-guide-australian-government-guide-regulation>

### **What options are being considered in the poultry RIS?**

We are seeking comments on the RIS on the potential changes to Australia's poultry welfare requirements and related legislation. The RIS examines a number of feasible alternatives – 'options' – for the management of poultry welfare, and the possible benefits and the regulatory impact associated with each option.

The RIS identifies seven options. A preferred option will be selected after considering submissions received during public consultation.

The RIS raises a number of questions to prompt comments on key issues, although answering these questions is optional when making a submission. The RIS presents seven options:

- Option A: Maintain the status quo (i.e. the base case, or the way things currently are)

- Option B: convert the proposed national standards into national voluntary guidelines (the minimum intervention option)
- Option C: adopt the proposed standards as currently drafted
- Variations of Option C:
  - Option D – vary the proposed standards to phase out conventional cages for chicken layers over 10 or 20 years in favor of alternative systems ‘typical’ free range/barn/aviary or furnished cages (with nests, perches, additional space and room to scratch/forage).
  - Option E – vary the proposed standards to reduce maximum stocking densities in barns or sheds for non-cage layer hens to 9 birds per m<sup>2</sup> and meat chickens 30kg/m<sup>2</sup>
  - Option F – vary the proposed standards to require the availability of nests, perches and litter for all chicken layers in cage and non-cage systems
  - Option G – vary the proposed standards to ban castration, pinioning and devoicing, no hot blade beak trimming at hatcheries, no routine 2nd beak trim – unless exceptional circumstances (hot blade permitted in this circumstance).

The Option eventually preferred could be Option A, B, C and/or a combination of one or more of the Options D, E, F or G.

### **What do we want from you?**

The public consultation seeks views on how well the:

- Proposed poultry standards will ensure the welfare of poultry
- RIS demonstrates the need for the standards
- RIS identifies the key costs and benefits for poultry producers, government and the wider community in all proposed standards.

The RIS includes questions which can be found here

<http://www.animalwelfarestandards.net.au/poultry/poultry-public-consultation/>  
(answering these questions is optional when making a submission).

### ***What are the main areas of welfare concern included in the RIS?***

The main risks to the welfare of poultry discussed in the RIS are:

- Lack of clear responsibilities for personnel in charge of poultry
- Lack of freedom of poultry to express innate behaviours
- Inadequate space allowances for poultry (stocking density and production systems)
- Lack of perches, nests and litter for layer hens (production systems)
- Lack of quantitative lighting standards
- Need for restrictions on routine beak trimming
- Risky litter management
- Need to restrict routine use of induced moulting
- Care of meat chickens and turkeys awaiting slaughtering
- Access to water for ducks.

### ***What does the RIS cost/benefit analysis show so far?***

- The RIS shows that all options would provide greater poultry welfare benefits than the base case (Option A), which is the current situation. (I.e. the existing MCOP for poultry are now 15 years old. Those for ostriches are 14 years old and those for emus are 11 years old.)
- All options other than Option B (guidelines only), would be costlier than the base case.
- Option C (proposed national standards), Option D (10) (10-year phase out of conventional cages), Option D (20) (20 year phase out of conventional cages), Option E (reduction in stocking density), Option F (furnished cages) and Option G (no routine hot blade and 2nd beak trim) would provide greater benefits than Option B but would also be costlier than Option B. The likely animal welfare benefits of the proposed national standards (Option C to G), whilst unquantifiable, are all likely to produce minor to significant welfare improvements over the base case and Option B (voluntary guidelines in lieu of mandatory standards).
- Option F would provide the greatest welfare benefit but would also be one of the most expensive options.
- Option C is estimated to be the least expensive option regardless of the discount rate chosen, however it is likely to provide lower net welfare benefits than Option F.
- Option F is ranked higher in terms of having a lower cost (in relative terms) with a 3.5% discount rate but is still more expensive than either Option C or G.
- It is indeterminate whether phasing out conventional cages over 10 years and 20 years under Option D, reducing stocking densities under Option E or banning hot blade trimming and routine 2nd beak trimming under Option G are likely to generate more benefits than Option C.
- Finally, the RIS shows the incremental average cost impact of Options C, Variations D (10 years), D (20 years) and Options E to G. Variation D (10 years) would result in the highest cost to the industry (\$1,138.74m) and the lowest would be Option A or B (\$0).

### ***What are the next steps for RIS and poultry standard process?***

Selection of the preferred option will be based on the greatest net benefit for the community. This step is awaiting response from the public consultation on the options and variations considered in this RIS.

Assessment of submissions from the public consultation process will give consideration to:

- The extent to which suggestions strengthen the intent and objectives of the Standards
- The volume and variety of responses making similar suggestions
- Form letters, which will be considered as providing a collective submission
- Anticipated benefits or adverse impacts if submitted suggestions were to be implemented
- The viability of implementing any suggested change.