

RIS PUBLIC CONSULTATION QUESTIONS

Date: 26/2/18

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Contact information

RIS location - 2.3.1 Risks to animal welfare

1. Do you agree with the summary list of advantages and disadvantages of layer hen farming systems in Part 2.3.1?

No Yes Comments:

Do you think that any advantages and disadvantages are missing from this list? If so, please include them below.

No Yes Comments:

A disadvantage inadequately addressed in the RIS is the risk to the rest of the poultry industry from lower biosecurity (and higher probability of disease) in the free range egg laying sector. While the cost of eradicating emergency diseases is raised in the list, the cost (of eradication activities) to other sectors of the industry has not been considered, nor has the cost of disruptions to exports in all poultry sectors. The cost of higher incidence of endemic disease spread to other sectors of the poultry industry has not been addressed either.

For example, long-lived birds such as layers are considered as long-term carriers and shedders of many significant poultry pathogens, that may cause significant diseases in short-lived birds in close proximity, especially in meat chickens. Most noticeably, viral diseases such as Infectious Laryngotracheitis and Marek's diseases have spread intermittently from layers to broilers, resulting significant costs for interventions including vaccination to the chicken meat industry in the area.

2. Do you think the risks to the welfare of poultry discussed in Part 2.3.1 are sufficient to justify the introduction of better standards and/or guidelines?

No Yes Comments:

Some of the risks identified in Part 2.3.1 do justify the introduction of better standards and guidelines to protect poultry welfare in Australia.

We support the establishment of definitive minimum standards for stocking density and agree with the base case option standards in this respect.

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Litter quality is an important welfare factor, which needs to be properly managed. It is appropriate to have a standard to address litter management, however the standard needs to also acknowledge and reflect the practicalities and difficulties involved in litter management. It is critical to understand that litter works can cause adverse welfare outcomes such as scratches, smothers and great stress in birds. See 'additional comments and suggestions'.

3. Which of the above mentioned areas of risk to poultry welfare do you think are of the greatest concern?

Comments:

All of the above are important.

Are there any other areas of concern to poultry welfare? Please provide reasons for your answers, together with supporting scientific evidence.

Comments:

RIS location - 2.4.1 Lack of clarity in standards

4. In your experience, to what extent do the existing Model Codes of Practice (MCOPs) and related regulations create uncertainty for Industry?

Comments:

The existing MCOP is clear and does not create uncertainty, however it fails to provide guidance on certain welfare indicators. We as meat chicken company essentially adopts the 'must' and the 'should' in the MCOP in our daily practices, as regulatory and minimum standards anyway.

Does such uncertainty vary between different states and territories?

Comments:

5. In your experience, how does this type of uncertainty for industry adversely affect productivity? If possible, please provide some case examples.

Comments:

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RIS location - 4.2.4 Option B: (non-regulatory option – voluntary national guidelines)

9. Do you think that the net benefits to poultry welfare likely to achieved under **Option B**, are justified?

No Yes Comments:

Even as a voluntary national standard and guideline, the new S&G would provide some certainty and guidance to the Australian producers, and hence improving the welfare of the birds.

Would the combination of costs and benefits under **Option B** be preferable to other options?

No Yes Comments:

If voluntary, the benefits of the new S&G will be greatly compromised. This will also lead to inconsistencies with respect to state and territory legislation.

A nationally legislated welfare standards and guidelines will also give the general public reassurance and confidence in the Australian Poultry industry.

RIS location - 4.2.5 Option C: (the proposed national standards as drafted)

10. Do you think that the proposed national standards under **Option C** reflect community values and expectations regarding the acceptable treatment of poultry?

No Yes Comments:

Anationally consistent standards and guidelines for poultry that are scientifically sound and will improve poultry welfare and farming conditions across all species should be supported by the community.

However, we do not believe that there has been sufficient work done to establish what community values and expectations are with respect to acceptable treatment of poultry, so it is difficult to answer this question with any certainty. Furthermore, we challenge whether community beliefs and expectations even necessarily equate to good welfare from the bird's perspective in all cases.

Furthermore, one 'community expectation' that we feel has been overlooked to date is the expectations of consumers regarding poultry product pricing and affordability. Consumers have come to accept that the \$8 bbq chicken at the supermarket as a 'given'. How much would they be prepared to pay for changes in practice? While the RIS spells out the costs of implementation of various options, these costs have not been expressed in terms of what they will ultimately mean in terms of the price that consumers will need to pay for their poultry products, and it seems that the research necessary to determine how the majority of consumers

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No Yes Comments:

We do not believe that the proposal of a reduction of stocking density for meat chickens to 30kg/m² will achieve net benefits to poultry welfare.

Scientific evidence

The scientific evidence with respect to stocking densities is lacking in order to substantiate a reduction from the previous maximum permissible densities for all species of poultry. The densities proposed are also in accordance with internationally accepted densities for both meat chickens.

It is important to establish that stocking density is not the sole crucial factor for broiler welfare, where management and environmental factors are equally important (Berg and Yngvesson 2012). Factors to consider when determining stocking density include but are not limited to bird size, feeder space, drinker space, house dimensions, bird welfare, nutrition, breed, performance and economic return (University of Georgia 2005).

Although it's been shown in literatures that very high stocking density (which is not practiced in Australia, e.g. >47kg/m²) can lead to welfare disadvantages to birds. However, there's no evidence showing that that reducing the stocking density to less than 30kg/m² (Option B) from between 28-40kg/m² (Option C) for meat chickens will lead to any definitive and proven benefits to birds welfare. In fact, Buijs *et al.* 2009 reported that there are few measurable improvements when birds were housed at intermediate densities (23-35kg/m²). At these intermediate densities, management is considered to be the most important consideration. This contradicts to the claim that RSPCA has made in the RIS saying that there is a 'direct, linear relationship' between stocking density and welfare.

Economics

In theory, there are no lower limits on what the maximum stocking density can be, however, it has to be a sound and balanced decision based on animal welfare and economics. In the end of the day, we need a functional and profitable poultry industry to be able to AFFORD to provide the best welfare to the birds that we are responsible for.

In terms of the economic question, any significant changes in stocking density will have material impacts in terms of costs of production, shedding capacity/supply capabilities, job security and consumer pricing, outlined in the RIS in detail by ACMF.

To increase shedding capacity due to a reduced stocking density in most regions, especially in populated regions such as the Sydney basin, is problematic, costly and potentially could impact on the viability of certain processors. Further, the higher land costs in the Sydney basin as compared to country regions, would have a differential competitive impact affecting long-term viability of metropolitan based processors.

It is overly simplistic to assert that animal welfare needs to be considered in isolation! The proposed national standards strike a balance (Option C), which should not be altered.

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15. Do you believe that the net benefits to poultry welfare likely to be achieved under **Option G**, are justified?

No Yes Comments:

Would the combination of costs and benefits under **Option G** be preferable to other options, either as a stand-alone option or in combination with other options?

No Yes Comments:

RIS location - 4.3 preferred option

16. Which of the Options A, B, C, or combination of one or more Options D,E, F, or G, in your opinion would provide the greatest net benefit for the Australia community?

Comments:

Option C – please refer to ‘additional comments and suggestions’

17. Do you have any further information or data would assist in the assessment of the impacts (costs and benefits) expected under each of the options/variations?

Comments:

18. Do you think that any of the Options A to G are likely to have disproportionate impact on small businesses compared to medium and large business?

No Yes Comments:

Do you think that any of these options are likely to have a greater impact on small business than other options? Please provide reasons for your answers together with available supporting evidence.

Comments:

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	<i>least 5 Lux on average during light periods</i>	further reduction in light intensity below 5 lux for a short period on welfare grounds, under veterinary supervision.	veterinary supervision and for a short period only, light intensity is reduced to control an outbreak of pecking in layers, breeders or turkeys.
SA6.5	<i>A person in charge must ensure poultry except for meat chickens, emus, ostriches and quail are exposed to at least 4 hours of continuous darkness within a 24 hour period.</i>	The way SA6.5 and SB2.1 were written is confusing and conflicting Needs to be reworded.	A person in charge must ensure poultry are exposed to at least 4 hours of continuous darkness within a 24 hour period, except for emus, ostriches and quail, and meat chickens. A person in charge must ensure poultry are exposed to at least 4 hours of continuous darkness within a 24 hour period, for emus, ostriches and quail, and meat chickens after 7 days of age or on the day of pickup or during very hot weather.
SB2.1	<i>A person in charge must ensure that after 7 days of age, lighting patterns must encourage activity and provide a minimum period of 4 hours of continuous darkness each day except on the day of pickup (meat chickens) and meat chickens during very hot weather.</i>		Should be removed Or worded: A person in charge must ensure that lighting patterns must encourage activity.

7. Temperature and Ventilation

Clause	Current Wording	Comments	Alternative Wording
SA7.2	<i>A person in charge must ensure that mechanically ventilated sheds have: 1) a back-up power supply that is tested weekly; and 2) automatic alarm systems to warn immediately of ventilation failure; and 3) a system in place to respond and take action at the first reasonable opportunity.</i>	Clear definition of 'MECHANICALLY VENTILATED SHED' in the glossary is lacking. The 'classification' on ventilation systems of poultry houses could only be found in SB2.3 Meat Chickens , where housing types were classified as any of 1) Tunnel ventilated or extractive system etc, 2) other mechanically ventilated (stirring fans, water-	A person in charge must ensure that mechanically ventilated sheds have: 1) a back-up power supply that is tested weekly; and 2) a system in place to respond and take action at the first reasonable opportunity 3) For poultry houses that solely rely on mechanical ventilation for airflow management, there must

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		<p>housing types. It is important that the impact of these litter conditions are <u>minimised</u>. Methods to achieve optimal litter condition, such as frequent rotary hoeing, in some cases can result in adverse welfare outcomes e.g. scratching, smothers, stress.</p> <p>This standard should be rephrased to better reflect practicalities and difficulty of ensuring optimal litter under all circumstances. E.g. the word 'avoid' should be replaced by 'minimize'.</p>	
GA8.2	<i>Where appropriate, poultry housed indoors should have access to a littered area, the litter occupying at least one third of the ground surface in order for birds to forage and dust-bathe. Litter should be at a depth suitable to the species.</i>	<p>Note this guideline does not apply to all species of poultry.</p> <p>Also, note in meat broilers, chick paper can be used to cover 100% of the brood area at bird placement, this is to reduce the risk of litter ingestion when the birds are young.</p>	<i>Where appropriate, poultry housed indoors should have access to a littered area, the litter occupying at least one third of the ground surface in order for birds to forage and dust-bathe. Litter should be at a depth suitable to the species.</i>

9. Handling and Husbandry			
Clause	Current Wording	Comments	Alternative Wording
SA9.13	<i>A person must not pluck live poultry</i>	<p>There should be an exception to this standard where some feathers need to be removed on live poultry as veterinary procedures for flock health monitoring, diagnostics or treatment, for example:</p> <ul style="list-style-type: none"> - to facilitate blood collection - for feather collection of diagnostic testing - to facilitate surgical procedures 	<i>A person must not pluck live poultry, with the exception of removal of small areas of feathers for veterinary practices such as diagnostic samples collection and/or treatment.</i>
GA9.4	<i>A person should not carry more than 4 birds in each hand.</i>	<p>There are numerous variable such as age and size of poultry, that may vary the maximum number of birds allowed per hand.</p> <p>Should either be removed or reworded.</p>	<p>This standard should be removed</p> <p>Or worded as such:</p> <p><i>A person should not carry more than 4 birds in each hand, unless the operator can easily carry more without causing pain and distress to the birds (as stated in SA9.1)</i></p>

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		<p>they can be always be unloaded immediately.</p> <p>In the meantime, we as a broiler processor acknowledge the need to protect birds from adverse conditions while awaiting slaughtering. We propose that there should be an allowance of 30 minutes from the time a truck is logged in at the weighbridge to when it is unloaded before the requirement for weather protection.</p>	<p>adverse weather such as rain and wind”.</p> <p>There must be a ‘phase in’ period of at least 5 years post S&G sign-off for this standard, to allow the necessary facilities to be created, expanded or modified to fully and consistently comply with its intent.</p>
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