

26 February 2018

Poultry Welfare Standards Public Consultation
PO Box 5116
Braddon ACT 2612

By email: publicconspoultry@animalhealthaustralia.com.au

Dear Sir, Madam

Proposed Australian Animal Welfare Standards and Guidelines for Poultry - Public Consultation

Thank you for the opportunity to comment on the proposed *Australian Animal Welfare Standards and Guidelines for Poultry*. The Proposed Standards will govern the way over 650 million animals are farmed and slaughtered in Australia every year. By this measure, they are the most important animal welfare standards in the country and community interest in their development is high.

The RSPCA has significant concerns with the way the Proposed Standards have been developed thus far. The lack of independent scientific review, the deficiencies in the scientific support papers produced by the Standards Writing Group, the restrictive context of the stakeholder deliberations, and the subsequent failure of the Proposed Standards to recommend meaningful changes to current industry practice raise serious questions over the integrity of the Standards development process.

The Proposed Standards do not reflect current scientific knowledge, nor are they consistent with Australian community expectations. We are aware that over 100,000 people have made submissions to this public consultation process. This is by far the largest community response to an animal welfare public consultation process in Australia's history.

We are also concerned that the Consultation Regulatory Impact Statement (the RIS) is severely lacking. It fails to sufficiently assess the animal welfare benefits and in some parts is grossly misleading in its presentation of the animal welfare impacts of the various options considered. Additionally, the underlying assumptions in the economic modelling are deficient in key respects and the consideration of costs goes beyond the scope of what a Regulatory Impact Statement is designed to assess. The RIS as currently drafted cannot be relied upon to recommend an animal welfare policy decision. Accordingly, RSPCA Australia is not able to put forward a preferred regulatory option from the RIS as currently drafted. Instead, we refer Animal Health Australia and the RIS consultant to our detailed comments on the RIS and the Proposed Standards outlined in the enclosed submission.

As the RIS notes, 'the successful pursuit of many industries involving animals is dependent on community confidence in the regulation of animal welfare' (page 11). The RSPCA is concerned that the Proposed Standards will damage community confidence in Australia's poultry industries and the Government's approach to regulating animal welfare should the Proposed Standards remain unchanged.

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We trust that Animal Health Australia and the RIS consultant will seriously consider this submission, along with the many others from the Australian community, with a view to amending the Proposed Standards and the Decision RIS to better reflect the current scientific evidence and the views of the Australian community.

Yours sincerely,

A handwritten signature in black ink that reads "Heather Neil". The signature is written in a cursive, flowing style.

Heather Neil
Chief Executive Officer
RSPCA Australia
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Sector: animal welfare organisation