

23rd February 2018

Animal Welfare Standards Public Consultation
PO BOX 5116
Braddon
ACT 2612
publicconspoultry@animalhealthaustralia.com.au

Building 007
Tooma Way
Charles Sturt University
Locked Bag 588
Wagga Wagga NSW 2650

02 6923 6900
info@agrifutures.com.au
agrifutures.com.au

Dear Sir/Madam,

AgriFutures Australia administers the Chicken Meat R, D&E program which is funded through chicken meat industry levy contributions that are matched by the Government. The program invests in a broad range of research aimed at improving all aspects of chicken meat production in Australia to, and beyond, international standards. Recommendations for investment in R, D&E are made by an Advisory Panel that is comprised of key industry technical personnel.

On behalf of the Chicken Meat Panel of AgriFutures Australia, I wish to make the following submission with regard to the Australian Animal Welfare Standards and Guidelines for Poultry, currently open for public consultation. The points made will be limited to poultry managed within the chicken meat sector only.

As stated in the Regulatory Impact Statement (RIS), it is accepted by the Chicken Meat Panel that “animal welfare is becoming increasingly important to industry, government, retailers, consumers and the general public, both in Australia and internationally.” Reflecting this AgriFutures Australia have clearly identified good animal welfare outcomes as a key objective in the current 5 year plan, our position being that good welfare decisions should be informed by sound scientific evidence. If research is contentious, incomplete or unclear then it is our view that it would be inappropriate to use it as the basis for legislative change as this could direct industry to manage their flocks in a way that could actually be to the detriment of their welfare.

Of the options set out within the RIS document the AgriFutures Australia Chicken Meat Panel are agreed that, “Option C: adopt the proposed standards as currently drafted, which would replace in the MCOPs in the base case;” provides the best approach to consistent progress in this area. This option includes some new standards that reflect the outcomes of science or reviews of science that are relevant to an Australian context because they were supported by AgriFutures Australia. For example, “Effects of Light intensity on behavior and welfare,” Rault et al 2016, determined that “welfare measures reflective of biological functioning or leg health did not show significant changes” when managed on 5 or 20 Lux light intensity levels <https://academic.oup.com/ps/articleabstract/96/4/779/2632651?redirectedFrom=fulltext>) which contributed to the current draft standards on light intensity.

We are strongly opposed to Option E, which suggests a reduction to a stocking rate of 30kgs/m². The reasons for this are twofold. Firstly, the associated adoption costs for this option would be excessively high for the industry to absorb but secondly, there is no clear scientific evidence to support that a reduction to this level would improve bird welfare outcomes and in fact may result in the

Building 007
Tooma Way
Charles Sturt University
Locked Bag 588
Wagga Wagga NSW 2650

02 6923 8900
info@agrifutures.com.au
agrifutures.com.au

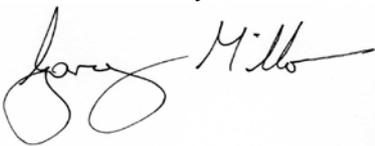
contrary. A recent AgriFutures Australia funded review of Australian and international literature identified that variations in current permissible stocking rates (e.g. 42kgs in the EU & 40kgs in Australia) were affected by many factors and reported that “Such variation in permissible stocking densities reflects policy-makers and scientists views that stocking density alone does not determine welfare outcomes. A large number of variables in addition to ambient conditions may take precedence over or interact with density to influence welfare, including strain of bird, litter type, quality of management, lighting and feeding schedules.” The report concludes that “Taken together, these studies indicate that under commercial conditions, stocking density has little effect on several key welfare indicators (mortality, walking ability, skin conditions, jostling) at densities used in Australia.” (<http://www.agrifutures.com.au/wp-content/uploads/publications/17-022.pdf>).

We have no comments to make on Options D and F, as these are essentially matters affecting the egg industry (and also areas in which AgriFutures Australia has not been involved in funding research).

Option G, “vary the proposed standards to ban castration, pinioning and devoicing. No hot blade beak trimming at hatcheries, and no routine beak trimming – unless exceptional circumstances (hot blade permitted in these circumstances),” in principle seems a reasonable addition to Option C for the chicken meat industry, although it is not an area in which AgriFutures Australia has supported research.

We trust that you will take due consideration of our comments and views based on the scientific evidence provided and that our communication will be of assistance in concluding the best options to adopt, being that which is currently drafted, hence ensuring the best possible welfare outcomes for Australian meat chickens.

Yours faithfully,



Gary Millar
Chair, AgriFutures Australia
Chicken Meat Advisory Panel