

# Public Consultation for Australian Animal Welfare Standards and Guidelines- Poultry RIS Questions

Specific public consultation questions related to the Regulation Impact Statement (RIS) have been drafted by the independent RIS consultants and approved by the Office of Best Practice (OBPR). These questions are located throughout the main body of the RIS and have been extracted below for your convenience.

Views and advice are sought in providing information or data that would further assist in the assessment of the impacts (costs and benefits) expected under each of the RIS options/variations. The questions are requests for additional information, requests for reader opinions or value judgements, and requests related to the selection of a preferred option or group of options.

Q1, Q4, Q6 and Q17 are requests for additional information about the problems addressed by this Consultation RIS, to inform the subsequent Decision RIS.

Q2, Q3, Q5, Q7 and Q8 are requests for reader opinions or value judgements about the problems addressed by this Consultation RIS.

Q9, Q10, Q11, Q12, Q13, Q14, Q15 are requests related to the selection of a preferred option or group of options.

**Please note:** The questions are optional and don't have to be answered to make a submission, you can do this separately or in conjunction with answering all or some of the below questions. It is suggested you have a copy of the RIS in front of you whilst answering the below questions to help with context.

Public consultation questions on the Poultry Welfare Standards Regulation Impact Statement, drafted by the independent RIS consultants and approved by the Office of Best Practice.

Oct 2017

## RIS PUBLIC CONSULTATION QUESTIONS

**Date:** 25-2-18

**Name:** Fremantle Egg Company

**Contact information:** 040 908 1705

### 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: The RIS provides a comprehensive list of advantages and disadvantages of the three production systems.

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

No     Yes    Comments: The RIS fails to focus on important advantages of the caged production system. Caged birds have the lowest mortality rate, bird welfare is the upmost priority of all farmers, the caged system creates the most safe environment for birds, as it removes any dangers such as predators, smothering, cannibalism, and feather pecking.

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: We recognize that the previous Model Code of Practice was insufficient as it works only at a voluntary basis, improvements can be made to each of the production systems, and creating clear guidelines of welfare will continue to improve poultry standards.

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

Comments:

As mentioned each production system has advantages and disadvantages, the areas of greatest concern are bio-security, predators, smothering (in free-range and barn) disease prevention.

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

Comments:

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**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 MCOPs did not create uncertainty in the industry, the mixture of 'must' and 'should' statements in the MCOPs made it more difficult to implement and prosecute, though in experience farmers main priority is hen welfare, with farmers following the voluntary guidelines and when in place you achieve a low mortality and high production rate.

Does such uncertainty vary between different states and territories?

Comments:

No, each farmer should have been aware of their own welfare guidelines.

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 - 2.4.2 Excess regulatory burden**

6. Are you aware of any other poultry farming businesses in addition to those given in Part 2.4.2 that operate in more than one state or territory? If so, please list.

No     Yes    Comments:

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7. In your experience, what is the effect of cross-jurisdictional inconsistencies on industry (i.e. even where jurisdictional standards are clear and verifiable)? If possible, please provide some case examples of where additional costs have been imposed on industry as a result of such inconsistencies.

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Comments:

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8. Do you think there needs to be national consistency in animal welfare standards for poultry? Please provide reasons for your answer.

No  Yes Comments: If there is not a national consistency then there is the potential that states will be left at a disadvantage.

**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: No, it is the appropriate and right time for welfare compliance to be mandated.

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

No  Yes Comments:

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**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:  
After extensive welfare research between industry groups and animal welfare groups, Option C provides a balanced and appropriate move to mandating welfare guidelines.

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

No  Yes Comments: mandating welfare guidelines removes any conjecture or uncertainty around hen welfare.

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

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- No     Yes    Comments: There will be costs incurred by farmers with the implementation of Option C, though these costs are manageable as this will see improvements for hen welfare

**RIS location - 4.2.6 Option D: (vary the proposed standards [Option C] to include phasing out conventional cages for layer hens)**

- 12.** Do you believe that the net benefits to poultry welfare likely to be achieved with a 10 and 20 year phase out of conventional cages under **Option D**, are justified?

- No     Yes    Comments: Caged production has the lowest mortality and highest production of the three systems. Banning caged eggs is removing an important food production that provides healthy meal options for low income families.

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

- No     Yes    Comments: There was large amounts of investment only 10 years ago into conventional cages. Farmers are still repaying debts, and also there would need to be a significant increase in Free-Range over that time period to compensate for the drop in production.

**RIS location - 4.2.7 Option E (vary the proposed standards [Option C] to reduce maximum stocking densities in barns or sheds for layer hens and meat chickens)**

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

- No     Yes    Comments: There is very little science concerning stocking density that provides animal welfare is improved when increasing stocking density.

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

- No     Yes    Comments:
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**RIS location - 4.2.8 Option F (vary the proposed standards [Option C] to require the availability of nests, perches and litter for all chicken layers in cage and non-cage systems)**

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

- No     Yes    Comments:

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

No     Yes    Comments: As mentioned, there has been large amounts of investment into conventional cages, costs incurred to move from conventional cages to furnished is not practical for farmers as the costs will be very difficult to cover.

Also there is no support from animal welfare groups that furnished cages will be supported.

**RIS location - 4.2.9 Option G (vary the proposed standards [option C] to ban castration, pinioning and devoicing, hot blade beak trimming at hatcheries, and routine second beak trim)**

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

No     Yes    Comments:

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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:

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**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 focuses on proper husbandry and mandating guidelines around hen welfare. This option provides a balanced approach to focusing on the welfare of the birds, and also meeting community expectations that in any of the production systems the birds welfare is the main priority.

There are a lot of different arguments regarding hen welfare. Displaying natural tendencies but being at a higher risk of disease, feather pecking and cannibalism in comparison to a caged system that provides the lowest mortality but is offset by hens loosing the ability to display some natural tendencies. Consumers are entitled to making their own choice as to what eggs they would like to buy. Natural market forces

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should be the best indicator of which production system methods Australian farmers should be investing in.

- 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:

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- 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: Apart from A & B, Regardless of size, costs are relative to the input and output of each farm.

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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## OTHER COMMENTS OR SUGGESTIONS

Please include any comments or suggestions that you'd like to share.

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