

26 February 2018

Poultry Welfare Standards Public Consultation  
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BRADDON ACT 2612

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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.

RSPCA WA has significant concerns regarding the way the proposed standards have been developed thus far and the integrity of the process:

- (i) the lack of independent scientific review
- (ii) the deficiencies in the scientific support papers produced by the Standards Writing Group
- (iii) the restrictive context of the stakeholder deliberations
- (iv) the subsequent failure of the proposed standards to recommend meaningful changes to current industry practice.

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 (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 RIS is designed to assess.

Detailed comments on the proposed standards and the RIS are included in RSPCA Australia's submission, which RSPCA WA endorses.

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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 they remain unchanged.

We trust that Animal Health Australia and the RIS consultant will now seriously consider the public submissions, with a view to amending the proposed standards to better reflect the current scientific evidence and the views of the Australian community.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lynne Bradshaw'. The signature is fluid and cursive, with the first letter 'L' being particularly large and stylized.

**Lynne Bradshaw**  
**President**