

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: January 8th, 2018

Name: Peter D Fraser

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

Comments: See attached submission. There is no mention of caging animals for the production of eggs and meat as a "Specific deficiency in current MCOP for poultry" (table 14.1) . It is assumed in the draft and the RIS that caging animals will continue. This is a significant deficiency not addressed and I would concur with several agencies that if this was omitted because of undue interference by industry bodies, such an omission should be referred to ICAC.

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

Yes Comments: See above. List 14.1 fails to mention caging of animals as an unnecessary practice.

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?

Yes Comments:

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

Comments:

Not mentioned in table 14.1 or anywhere else is the caging of animals.

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

Comments:

See my submission on the basic underlying assumptions in the Draft. The argument that quantitative evidence that animals experience stress and pain is not available and that therefore only qualitative judgements can be made to determine a position, is philosophically and practically nonsensical. Your

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request, therefore, for scientific evidence is invalid, as your own argument implies that this is not possible to so provide, if by “Scientific” you mean “quantitative measures”. See 2.3.1

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:

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:

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:

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.

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.

Yes Comments:

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 Comments: anything other than mandatory requirements will not achieve net benefits to poultry welfare, and only then if far more stringent requirements are met.

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

No Comments:

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 Comments:
While standards must be mandatory rather than mere guidelines, there is no requirement to phase out caged production. An acceptable treatment for poultry is to eliminate caging altogether and in as fast a time as possible, but certainly less than 5 years.

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

No Comments: Not unless caging is eliminated.

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

No Yes Comments:

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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 Comments: Caging must be phased out over a much shorter period and in any case less than 5 years. I simply do not trust the political and / or bureaucratic system to be able to sustain a long term policy position without substantial changes as time proceeds. It is far better to eliminate unethical practices in the immediate or very short time frame and allow industry to adapt to a new paradigm in as short a time possible.

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 Comments: Unless substantial change can occur it would be preferable for no change until there is such an outcry about animal cruelty that change will be swift and comprehensive. Making a substantial change now would be preferable to a more chaotic change at a later date.

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:

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:

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)

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

No Yes Comments:

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:

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:

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:

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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:

OTHER COMMENTS OR SUGGESTIONS

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

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