

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: February 23, 2018

Name: Natalie Morgan

Contact information:

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: Production is greater in caged hens, suggesting these birds are comparatively less stressed. Mortality is also significantly lower in caged hens compared with any other system.

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

No Yes Comments: Need to include comments on flock uniformity.
Need to include more details on the benefits of furnished cages
Free range birds eat the soil, thus contracting parasites
Free range issue with flocks uniformity and utilisation of the diets (ranging birds have different requirement to those that stay inside the shed)

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:

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

Comments:

Pecking order and stress; caged birds are less stressed as highlighted by increased production and reduced mortality

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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Nutrition and flock uniformity. Cages birds expend the same energy so can all be fed the same diet, but in barn and free range the birds move different amounts and have varied access to feeders so have different nutritional requirements, especially in free range.

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:

It is unclear how to manage litter properly. Also varied views in beak trimming. There is a lack of understanding about enrichment and its potential benefits. Lack of understanding of what the consumer actually wants

Does such uncertainty vary between different states and territories?

Comments:

No, an issue for the whole country

5. In your experience, how does this type of uncertainty for industry adversely affect productivity? If possible, please provide some case examples. .

Comments:

Consumers and the general public are not given actual facts, if they understood the pros and cons of cage vs free range better they may think differently. There is pressure on the industry to not use cages based on public perception, but the industry know cages, particularly furnished cages, have a lot of advantages over free range. The industry are being forced to go against their better judgement on bird welfare

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

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examples of where additional costs have been imposed on industry as a result of such inconsistencies.

Comments:

Farmers are already in debt as a result of the last changes in standards for cages. If we get rid of them again those individuals will be bankrupt.

Variation in free range systems, ie. Winter gardens, rocks to clean feet, caravan style. The benefits of having just open land versus having lots of enrichment in the range area, both are technically free range, but the one with more on the range will be utilized more and increase welfare but is more costly. How many birds must be on the range to be considered as free range is a concern.

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: We need everyone to be meeting a minimum standard of welfare. If the public know that all systems meet the same level of welfare it will change the viewpoint of only free range chickens are 'happy'

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: Farmers are already meeting welfare standards. They know if welfare is bad, production is bad. Meeting a certain level of welfare is already essentially mandatory.

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

No Yes Comments: It is important that staff are trained in management, management is the main driver of the whole process, so the training aspect is imperative and should be mandatory.

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: Where will this money come from? The consumer will have to pay more. Farmers are already meeting regulations, I think implementing strict and expensive regulations on them will be detrimental to the industry

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

- No Yes Comments: I think this may have the opposite effect in that farmers won't be able to meet the high cost and demand and farms will have to be shut down, reducing availability of eggs.

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

- No Yes Comments: I think farmers are already meeting standards, they just need increased consistency and public support.

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: Where are all the additional layers going to be housed? Also mortality is high in other systems and production reduced, so you will need even more birds.

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: The welfare risks outweigh the benefits. Furnished cages are the best system in my opinion.

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: Indeterminable suggests we may not see any benefits? A great deal of research has been conducted on stocking density and we have the optimum currently to meet bird welfare and keep production.

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: We may not see any benefit for such a high cost.

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: It is imperative birds have nests and perches and scratch padsto enhance welfare of caged hens.

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: Very high welfare benefits for caged birds. More research is required into the economic benefits.

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: Feather pecking and cannibalism affects all birds in all production systems. When laying birds are kept in systems that give the opportunity for aggressive birds to contact many other birds, cannibalism and feather pecking can spread rapidly through the flock and result in injuries and mortality. Farmers are experienced in these needs

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:

B and F. We need to keep cages, ideally have furnished cages with perches, nests and scratch pads. This would result in better welfare whilst maintaining production and health. Farmers are already doing a great job of maintaining bird welfare, it could just be improved with some enrichment.

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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:

We need to consider the bigger impact; if we get rid of caged eggs in Australia we will not have enough eggs and will have to import them from elsewhere, ie. Asia, where the welfare is much worse. The issue is the public don't know the facts about cages, there is too much publicity promoting free-range which is actually a bad system.

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: Small companies will not be able to meet the high costs incurred by most of the options.

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:

The small free-range companies will have to expand if we get rid of cages to try to help meet the demand for eggs.

OTHER COMMENTS OR SUGGESTIONS

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

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