

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 20, 2018

Name: Peter bell

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: Subject to the following comments.

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

No Yes Comments: Cage Advantages – A key point is the reduced oral-faecal cycle which greatly reduces the disease risk and improves food safety; Cages have the lowest carbon footprint and is best for the environment; Mortality is a key indicator of welfare – the fact is less birds die in cages.
With reference to the listed disadvantage of more bone fractures it is pointed out that most research surveys identify more bone fractures in non-cage systems due to collision and perch damage.

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: Yes, there are improvements that can be made to all systems of egg farming. The issue mainly relates to education and in particular for new entrants to egg farming. There is mention of the numbers of birds involved and it should be mentioned that the focus has been on cage egg production with much less scrutiny on barn and free range. The facts are that more birds get sick and more birds die in non-cage systems due to the inherent weaknesses of faecal exposure, disease, social pressures, injurious pecking, smothers, and fox predation.

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

Comments:
Disease, mortalities, injurious pecking, smothers, and fox predation.

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

Comments:

The points listed above are well covered in the Victorian Welfare Review of scientific literature. It is noted that in that report the conclusions don't always match the data presented, particularly in mortalities being a key indicator of welfare.

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:

Generally, they don't create uncertainty – it is more a case of farmers reminding themselves what is in the MCOP's.

Does such uncertainty vary between different states and territories?

Comments:

There is a difference in the adoption of the MCOP's in legislation between states. Farmers would be aware of their own state requirements.

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

Comments:

Following the adoption of the 4th Edition of the MCOP in Australia some states adopted it in its entirety, others changed the wording to suit their legislative system. In the case of the new cage standards of 1/1/2008 the application of this was applied differently in some states e.g. NSW and Victoria.

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.

Comments:

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: National consistency provides a level playing field for competition. In the egg industry eggs are commonly traded across state borders.

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 be achieved under **Option B**, are justified?

No Yes Comments: Certainty of legislation will provide a mechanism for compliance in areas of bird welfare.

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

No Yes Comments: It is often preferable to have a system which is voluntary and in this case there would be less costs but it is recognized there needs to be compliance as well.

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:
The Standards & Guidelines was an extensive and comprehensive over several years. All states and territories were involved in the production of the Standards and Guidelines. Equal input was given by Governments, industry, and animal welfare groups. Option C will provide the best opportunity to achieve a balance.

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

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- No Yes Comments: Currently the MCOP is only a Code. Having the Standards in legislation will provide certainty.

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

- No Yes Option C is the preferred option because it brings change, but not radical change, which would be an impost on both industry and consumers.

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: The debate on the banning of cages does not take a holistic view of all factors. Essentially the anti-cage position is one based on interpretations of animal behavior and ignores the elements of disease, mortality, and injurious pecking.

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 large cost of a phase out of cages either over a 10 year or 20 year period would not be offset by benefits. Cages still provide welfare benefits over other systems; a change to non-cage systems would require greater flock numbers due to reduced productivity.

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 a very large cost to reduce stocking densities in non-cage layers. The Victorian Welfare Review (Bristol University) notes that there did not appear to be welfare advantages in reducing density from 12 birds/sqm down to 9 birds/sqm.

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: There is no benefit in adopting a different arbitrary number of birds per sqm.

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: There are several elements to Option F. Nests and perches are generally provided in all non-cage systems. There are some fully slatted sheds that do not have a litter section and this is chosen to reduce the risks of disease to the birds and remove a potential source of salmonella contamination. The proposal to have all these features in cages is essentially suggesting that furnished cages be installed. The proponents of this section have said they are opposed to furnished cages and thus appears to be a mischievous claim.

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: The high cost to achieve some or all these components would not be offset by 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: My comments are based more on a "no-yes" basis. Castration, pinioning and devoicing are not used in the commercial egg industry and it would be appropriate to ban these. In the case of beak trimming, this remains a valuable tool in protecting laying birds from serious injury and death. The vast majority of layer pullets are treated with infrared at day old which is accepted. The use of hot blade may occur in very small hatcheries who cannot afford an infrared machine. In the case of a hot blade second trim there are often cases where this would save large numbers of birds where injurious pecking (causing death) is occurring.

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: As above.

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?

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Comments:

There are numbers of competing forces in this equation – animal welfare (and what it means to different people), effect on the egg business, access to capital, effect on the environment, food safety, worker safety, food affordability, and consumer expectations. The key point in welfare should be freedom from illness and death. On balance Option C gives the best outcome.

- 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:

Essentially any change will have an impact on costs – some minor and some major. The key point is how to fund these changes. It is easy to put forward ideas and many of the proponents do not provide a mechanism for providing the capital.

- 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: The Options outlined (except for A & B) would likely have a similar impact on small and large businesses. Circumstances differ between operators but in principle there will be a requirement for capital, the quantum is the difference.

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 outlined options (except for A & B) would have varying impacts on small and large businesses depending on their particular circumstances relating to production systems, shed types, size of property. In general the impact of the changes outlined in the options C-G would have a similar proportionate effect regardless of the size of the business.

Option C: One of the impacts of changing to the Standards & Guidelines is the increased compliance responsibilities. It is likely this would affect small businesses more as they would be less likely to have administrative processes in place. The other changes under this option would reflect more whether the production facility was new or old. This would be the same impact for large and small.

Option D: The phase out of cages would impact both large and small businesses.

Option E: The decreased density would require large capital expenditure for capital expenditure both large and small businesses.

Option F: The two components in this are: (1.) The use of litter in slatted floor would affect both large and small. (2.) The inclusion of litter, nests, perches, and scratch area in cages would impact severely on large and small businesses.

Option G: The impact relates to beak trimming. This would affect large and small proportionately.

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OTHER COMMENTS OR SUGGESTIONS

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

REGULATORY IMPACT STATEMENT ("RIS")

The RIS is a very detailed and complex document. The consultants had a large task in dealing with the many variations in the Options as presented to the RIS. It is noted that it isn't just a case of changing one system to another or just changing a number. As an example, removal of birds from cages to a free range system doesn't just mean placing the same amount of birds as statistics show that productivity will be less and mortalities will be higher, thereby requiring more birds. The costs of non-cage systems are also significantly higher than for cages.

The RIS presents the costs and benefits to the various options and identifies the very large costs to the egg farmers and the consumers.

COSTS – WHO PAYS?

The RIS comprehensively outlines the costs required to implement the changes. It is not in the scope of the RIS to suggest how the changes would be funded but it is pertinent. Most of the cages in Australia were built in the lead up to the new standards applying from 1st January 2008 which was funded by industry. The options examined by the RIS present number of changes which have high capital costs, plus many logistical issues to achieve.

OPINIONS

The release of the draft Standards & Guidelines for public comment has brought many opinions into the public arena.

Egg farmers - Have presented their views on what bird welfare means to them. Many have been involved all their lives with farming hens for egg production. They have experience and believe they understand bird welfare and behaviours better than most others.

Community – It is difficult for consumers to gain all the facts on egg farming systems. Welfare groups gain much attention in the media and distort the facts or present only one side of the debate.

Moderate animal welfare groups – Like others involved in the debate, they have their own agendas. Some of these agendas are altruistic and others are about swaying people to their view on life.

Activist groups – Many have separate agendas other than just "bird welfare". Some have a vegan background and seek to ban all animal farming. Others have political agendas. Some make money from "accreditation" schemes. Others promote that their views are the only ones.

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