

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 21, 2018

Name: Shannon Loughnane

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: I disagree with how little value is placed on 'ability to display innate behaviours' – I don't think this can just be listed as an advantage akin to saving some dollars on giving fewer vaccinations, for instance. I believe this is an advantage that trumps most other concerns.

I also disagree with, or am disheartened by the fact that more investigations haven't been conducted into the individual emotional responses of hens to their cage environments. As these investigations were not conducted before this review, it is impossible to know the level of stress that each mode of housing the hens induces. This evidence can only be anecdotal, and the people that are spending the most time with hens have the most to lose in suggesting that hens exhibit high stress in caged environments. I think it can confidently be said that being bound in a cage that does not even allow the hens to extend their wings, for instance, is stressful and unnatural. I believe these very likely emotionally traumatic factors should be understood to be a significant disadvantage to cage systems.

I also disagree that 'financial' disadvantages are valid. I believe consumers will step up to the plate and be willing to buy more expensive eggs should it mean that animal welfare standards improve. And I believe businesses should be expected to adjust to these changes, instead of obstructing them. I believe that, given this review is about animal welfare, it is inappropriate to list financial benefits or disadvantages as if they are the obvious and valid counterpart to animal welfare concerns – in fact, they seek to obscure the animal welfare conversation entirely and should be stricken from the review.

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

No Yes Comments: As stated above, ability to express a range of healthy and positive emotions within hens would be a significant advantage of any compliant housing structure, and a damning disadvantage of those non-compliant. I would add to this social behaviours, ability to form positive relationships with species kin without undue environmental pressures causing competition and animosity unrealistic to wild relationships among animals. The ability to demonstrate social behaviours and

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form positive relationships with kin would be an added advantage of compliant housing structures.

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: Absolutely. There are not merely 'risks' to hen welfare, but countless and obvious infractions on welfare occurring right now across the industry. These violations of welfare need to be acted on right now, and better standards and/or guidelines need to be enacted swiftly, with the strictest and most humane possible solutions being pushed for.

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

Comments:

Space. Hens need space to move, to display innate behaviours, and to have some experience of their lives, bodies and minds. We are effectively keeping these animals in straightjackets, which we can no longer pretend is justified given their 'inferior' nature. No. These animals deserve space. They are giving their eggs, and oftentimes lives, in order to feed us. We should extend some modicum of respect to their kind.

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

Comments:

The hens should have access to sunlight, and to the air. They should have access to space, and as much as possible. 'Biosecurity' is only an issue because they currently live in such rarefied, confined, controlled spaces that as groups, they have little to no immunity to what's outside those four walls. If big agriculture invested more in research that attempts to link biosecurity and health to animal welfare instead of profitability, then we would have more substantive answers on how to best protect hens. But as it is, the cheapest option is considered best. Where it comes to nature, however, this is a shortcut. Hens are not hardy, and that is our fault.

Let's develop better vaccines, let's make sure companies are buying and administering them. Let's make hen health a matter of decency, not just of best 'yields'.

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:

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I am unsure, as I am not a practitioner within the industry but a concerned citizen. Nevertheless, I believe strong guidelines that are non-negotiable and whose infraction yields penalties would mean there is less confusion.

There would be less confusion because what a hen deserves – basic decency – would no longer be up for discussion. Let's raise the standard of animal welfare, and keep it cemented in law.

Does such uncertainty vary between different states and territories?

Comments:

I am unaware, please refer to above answer.

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

Comments:

Productivity is not what I am concerned about. But if providing certainty around stricter animal welfare measures means more focus and productivity, then industry should also get behind these measures.

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:

Unaware. Please see above.

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: Animal welfare should not be regarded as a matter up to any sort of 'discretion'. It should be firmly and consistently regulated, sending a message to

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consumers, industry and others that infractions against animal welfare will not be tolerated. Standards should not oscillate wildly between states – this sends entirely the wrong message.

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: I think any guidelines are better than none, and yes, an improvement in guidelines that promotes animal welfare is always justified. However, this is a very weak option – we need compulsory guidelines.

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

- No Yes Comments: Only preferable to doing nothing at all. This option is very weak, and I don't believe industry would voluntarily put themselves out of pocket to protect hen welfare.

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:
Mostly.

I don't think 'excess hatchlings' should just be killed. I think they should be attempted to be rehomed. I think we should also be taking a look at why 'excess hatchlings' are being born at all – animals are not a disposable product. If there isn't space or a market for these birds, then why are they being born at all?

Where poultry are 'suffering' and must be killed to spare them 'undue suffering', I think there should be some veterinary contact so that factory workers aren't just killing birds out of convenience. It seems very blithe to have not really consulted around what individual suffering means to these birds – eg. No cortisol blood tests have really been done on cage hens to test what the environment does to them – but then to just hand the responsibility of defining what that means over to random factory workers. No. There needs to be a vet consult.

Similarly, non-experts should not be able to kill poultry just because there is a 'delay' in getting an expert to the scene. No. An expert should always be on hand.

HOWEVER, if these standards do not phase out caged hens altogether, I cannot support them.

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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: All the improvements to animal welfare are justified. **HOWEVER, cages need to be banned outright.**

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

- No Yes Comments: **EXCEPT FOR THE OUTRIGHT BANNING OF CAGES. This is really the only acceptable option.**

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: **Yes. Banning all conventional cages can be the ultimately victory of this review. It's what needs to happen. Unquestionably.**

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: **Yes, the total banning of cages is the most appropriate step forward for animal welfare.** This, in concert with option G – to outlaw also these barbaric practices.

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: These moves are positive, but they don't go as far as banning cages outright – this is far preferable.

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: The total banning of cages goes the furthest to protect animal welfare. I believe this is what citizens of Australia want.

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: These moves are positive, but they don't go as far as banning cages outright – this is far preferable.

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 total banning of cages goes the furthest to protect animal welfare. I believe this is what citizens of Australia want.

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: These are very positive changes that I support wholeheartedly. These practices should be abandoned immediately as a cost-effective but cruel way to address problems of overcrowding. The real solution is, of course, to reduce overcrowding by BANNING CAGES OUTRIGHT. OPTIONS D and G ARE IDEAL.

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: **Option G, in concert with option D, makes the most positive strides towards proper animal welfare. Ones we can all be proud of.**

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:

Options D and G, together, provide the most sound steps forward towards proper animal welfare in Australia's poultry farms. Banning cages outright, and the subsequent barbaric practices designed to address problems created by life in cages, creates space for animals to live with a higher measure of peace. They will permitted space to exhibit their natural

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behaviours, to socialize without undue pressures of competition and self-preservation, to bathe and clean themselves, to feel the sunlight and air and to avoid diseases such as osteoporosis caused by being caged. It's the way forward. I think we all know this. We just need to stop abiding by industry pressure to cut corners and costs and listen to the type of nation we want to be, and what we want to stand for. Options D and G. Let's ban the cage.

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: I think if guidelines are consistent and abided by all, there should be no discrepancy in big to small businesses.

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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