

Animal Welfare Standards Public Consultation  
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**RSPCA SA Submission re Proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry (Version: Public Consultation, Nov 2017)**

Thank you for the opportunity to make a submission regarding the Draft Standards for Poultry.

The aim of this communication is to provide you with a brief summary of RSPCA's SA's core concerns regarding the Draft Standards. A fuller explanation of these concerns is provided in the submission from RSPCA Australia, which we endorse.

Further, we are attaching some recently published scientific research/reviews on poultry welfare, relevant to the Draft Poultry Standards. This research is too recent to have been considered earlier in the process, but may assist your current deliberations. In response to the perception that the Standards Development Process was failing to access independent scientific research, RSPCA conducted its own scientific review, and the Victorian government commissioned an independent scientific review, for the same reason (see both attached). Similarly, the Western Australian government recently concluded that the Poultry Draft Standards do not adequately reflect current animal welfare science and community expectations.

We are also attaching a link to the 7.30 segment, broadcast 21.12.2017, which suggests serious flaws and bias in the Poultry Standards Development Process.

The Australian Poultry Standards will impact the welfare outcomes of a staggering 10 million Australian hens every year, and given that poultry standards are unlikely to be reviewed again for at least 15 years – the sheer number of birds (approx. 150 million over 15 years) impacted by these standards underlines their importance.

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RSPCA is a science and evidence based organization and we believe that Australian Poultry Standards should reflect both contemporary science and community expectations for bird welfare. Unfortunately, the Draft Standards appear to fail both of these aims. Some of our key concerns are summarized below:

*RSPCA concern that the Poultry Standards Development Process was flawed*

The RSPCA has significant concerns about the process used to develop the Proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry. These concerns have been communicated on a number of occasions throughout the development process. The lack of independent scientific review, the deficiencies in the scientific support papers produced by the Standards Writing Group, the restrictive context of the stakeholder deliberations, and the subsequent failure of the draft Standards to propose meaningful changes to current industry practice have been clearly conveyed to Animal Health Australia, Animal Welfare Task Group members, and the Agriculture Senior Officials Committee.

Further, recent documents obtained under a Freedom of Information application show clear evidence that the Writing Group and the Contract Manager had pre-determined positions on contentious issues such as the continued use of conventional battery cages prior to the formal stakeholder consultation process. The documents show that these pre-determined positions impacted the manner in which the development process was managed.

*RSPCA concern over the lack of an Independent Scientific Review*

RSPCA Australia repeatedly expressed significant concerns with many proposed standards and objected to the process moving forward without an independent scientific review to inform the development of the standards.

*RSPCA has formally dissented from the Draft Standards*

Due to these serious concerns, RSPCA formally dissented from the Draft Standards, with a dissenting statement included in the Regulatory Impact Statement.

*RSPCA SA calls on our SA Government to ensure that Modern Science and Community Expectations are reflected in these Standards*

The RSPCA maintains that the only way to salvage any integrity in the process is for State and Territory Governments to show leadership by taking into account and acting on the extensive amount of contemporary scientific literature on poultry welfare, and the significant public concern about poultry welfare that have been clearly expressed by the Australian community. The ultimate test for the integrity of the Standards Setting Process will be determined by whether current science and community concerns are reflected in the final Standards document.

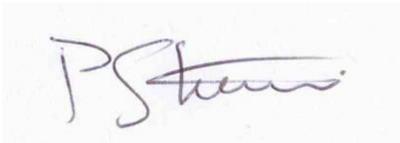
*For a more detailed account of these concerns, please see RSPCA Australia's Submission*

As previously noted, RSPCA SA endorses RSPCA Australia's submission on the Poultry Draft Standards. That submission provides a highly detailed account of specific issues pertaining to both the Standards and Guidelines and the Regulatory Impact Statement.

Thank you for your consideration and we strongly urge you to consider our National body's submission as well as the attached documents and link. We welcome the opportunity to discuss this issue with you further.

Yours sincerely

Mr Paul Stevenson  
CEO  
RSPCA, South Australia

A handwritten signature in blue ink that reads "P Stevenson". The signature is written in a cursive style with a large initial "P".

Dr Rebekah Eyers  
Animal Welfare Advocate  
RSPCA, South Australia

A handwritten signature in blue ink that reads "Rebekah Eyers". The signature is written in a cursive style.