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9 March 2018

Animal Welfare Standards Public Consultation  
Via email: [publicconspoultry@animalhealthaustralia.com.au](mailto:publicconspoultry@animalhealthaustralia.com.au)

Dear Sir/Madam

**CONSULTATION ON THE REGULATORY IMPACT STATEMENT AND DRAFT AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES FOR POULTRY**

Ingham's is one of the two major Australian chicken meat processors and is processing over one third of all chicken meat sold in Australia. Ingham's is also by far the largest turkey processor in the country. As Farming Director, I am responsible for all live bird operations and I therefore have a substantial interest in the proposed new animal welfare standards and guidelines (S&Gs) currently open for public consultation.

Animal welfare is an absolute priority in Ingham's operation and we have suitably trained and skilled employees and contractors at all out sites where live birds are cared for or handled. While we have strict internal standards, we welcome the development of national standards for poultry.

It is essential that animal welfare S&Gs are based on the best available science and are formulated in an unambiguous way. Increased regulatory requirements create very substantial costs which are only justified if there are clear and adequate animal welfare benefits to be expected from the requirements. Ingham's comments on the proposed draft S&Gs for poultry reflect these priorities.

I support fully the comments provided by the Australian Chicken Meat Federation (ACMF) on behalf of the chicken meat industry. I am supportive of Option C, a legally enforceable set of standards consistently implemented nationally, provided certain changes detailed in both the chicken meat industry submission by ACMF and the Inghams submission by Quinton Hildebrand, CCO, and those reflecting the turkey industry's concerns detailed in both the Ingham's submission by Janelle Cashin, COO and the submission by the Australasian Turkey Federation are made.

The modifications to the proposed draft S&Gs that the chicken and turkey meat industries request in their submissions are essentially relatively minor changes or clarifications to ensure an optimal outcome. The request to consider an alternative maximum density

requirement for turkeys (SB13.5) seeks a more significant change of fundamental importance to the turkey industry which deserves further comment.

I am concerned that the substantially reduced density for turkey broilers currently proposed in the draft S&Gs does not give adequate consideration to the scientific evidence, the severe operational implications to large scale farming of turkeys and the internationally applied standards. I am of the view that the alternative density scale for turkeys proposed by the Australasian Turkey Federation in its submission is an appropriate compromise for the national poultry standard.

Option E, proposing a reduction in maximum density for meat chickens to 30kg/m<sup>2</sup> involves a very heavy economic cost as well as an increased environmental burden. While Ingham's farms are at a maximum density of no more than 34kg/m<sup>2</sup>, I believe there is no conclusive scientific evidence supporting such a significant reduction from its current value of 40kg/m<sup>2</sup> to 30kg/m<sup>2</sup>. I therefore strongly reject Option E's greatly reduced density for meat chickens.

However, Ingham's would be supportive of a reduction of the maximum density to 38kg/m<sup>2</sup> as part of the holistic approach to broiler husbandry that we are advocating. In this context, it is important to recognise the significant difference between the national Animal Welfare Standards and Guidelines (with enforcement by law) and the voluntary participation in FREPA and RSPCA higher welfare schemes, as well as the emerging private standards imposed by major customers. While we farm at a density of no more than 34kg/m<sup>2</sup>, we believe the national standard should remain at a higher level because the animal welfare benefits gained from a reduction below 38-40 kg/m<sup>2</sup> are small compared to the effect of good animal husbandry.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alan Parnham', with a long horizontal flourish extending to the right.

Alan Parnham  
Director Farming