



www.ingham.com.au

9 March 2018

Animal Welfare Standards Public Consultation
Via email: 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. As Director of Technical Services, I am responsible for the implementation of and compliance with all relevant technical standards. I therefore have a substantial interest in the proposed new animal welfare standards and guidelines (S&Gs) currently open for public consultation.

Ingham's operates in all six States. Animal welfare is one of our operational priorities and, as a consequence, we have formed a strong partnership with RSPCA with all farms supplying chickens to Ingham's being certified under the RSPCA Approved Farming Scheme. Our substantial free-range operations are additionally accredited by FREPA. In addition, we comply with specific standards set by our major customers including major retail chains and quick service restaurants. These standards focus on quality, food safety and increasingly on animal welfare.

It is essential that animal welfare S&G 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.

Ingham's is in agreement with and supports fully the comments provided by the Australian Chicken Meat Federation (ACMF) on behalf of the chicken meat industry. We are supportive of Option C, a legally enforceable set of standards consistently implemented nationally, provided certain changes detailed in the chicken meat industry submission by ACMF and those reflecting the turkey industry's concerns (detailed in the Ingham's submission by Janelle Cashin, COO and the submission by the Australasian Turkey Federation) are made.

Option E, proposing a reduction in maximum density for meat chickens to 30kg/m² 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/m², we believe there is no conclusive evidence supporting such a significant reduction from its current value of 40kg/m² to 30kg/m². We therefore strongly reject Option E's reduced density for meat chickens.

However, Ingham's would be supportive of a reduction of the maximum density to 38kg/m² 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/m², we believe the national standard should remain at a higher level because the animal welfare benefits gained from a reduction below 38-40 kg/m² are small compared to the effect of good animal husbandry.

Food safety and animal welfare are amongst the most important drivers for our operations. In our long experience, we find that to get the best outcome at the least cost it is essential that the standards set are clear and measurable, are consistent to the extent possible across the various standards and across jurisdictions, and provide the necessary flexibility to allow veterinarian and technical specialist to react effectively to any special requirements and situations that they may face.

The modifications to the proposed draft S&Gs that the chicken and turkey meat industries request 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 fundamental change. I am of the view that the substantially reduced density 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 believe 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.

Yours sincerely



Katherine Balding
Director Technical Services