

Poultry Welfare Standards Public Consultation

PO Box 5116

Braddon ACT 2612

Sent via email to publicconspoultry@animalhealthaustralia.com.au

Monday 26 Feb 2018

Dear Sir, Madam

Proposed Australian Animal Welfare Standards and Guidelines for Poultry – Public Consultation

Thank you for the opportunity to comment on the proposed *Australian Animal Welfare Standards and Guidelines for Poultry*. The Proposed Standards will govern the way over 650 million animals are farmed and slaughtered in Australia every year. By this measure, they are the most important animal welfare standards in the country and community interest in their development is high.

RSPCA Qld has significant concerns with the way the Proposed Standards have been developed thus far. 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 Proposed Standards to recommend meaningful changes to current industry practice raise serious questions over the integrity of the Standards development process.

The Proposed Standards do not reflect current scientific knowledge, nor are they consistent with Australian community expectations. We are aware that over 100,000 people have already made submissions to this public consultation process. This is by far the largest community response to an animal welfare public consultation process in Australia's history.

We are also concerned that the Consultation Regulatory Impact Statement (the RIS) is severely lacking. It fails to sufficiently assess the animal welfare benefits and in some parts is grossly misleading in its presentation of the animal welfare impacts of the various options considered. Additionally, the underlying assumptions in the economic modelling are deficient in key respects and the consideration of costs goes beyond the scope of what a Regulatory Impact Statement is designed to assess.

As the RIS notes, 'the successful pursuit of many industries involving animals is dependent on community confidence in the regulation of animal welfare' (page 11). RSPCA Qld is concerned that the Proposed Standards will damage community confidence in Australia's poultry industries and the Government's approach to regulating animal welfare should they remain unchanged. We trust that Animal Health Australia and the RIS consultant will now seriously consider the public submissions with a view to amending the Proposed Standards to better reflect the current scientific evidence and the views of the Australian community.

The Royal Society
for the Prevention of
Cruelty to Animals
Queensland Inc.

ABN 74 851 544 037

Animal Care Campus

139 Wacol Station Road
Wacol QLD 4076

Locked Bag 3000
Archerfield BH QLD 4108

P 07 34 26 99 99
F 07 32 58 56 10
E admin@rspcaqld.org.au
W rspcaqld.org.au

Animal Care Centres

Bundaberg
Doblo Street
West Bundaberg QLD 4670
P 07 41 55 17 49

Cairns
Arnold Street
East Stratford QLD 4870
P 07 40 55 14 87

Dakabin
Goodwin Road
Dakabin QLD 4503
P 07 34 80 64 50

Gympie
Laurenceson Road
Gympie QLD 4570
P 07 54 82 94 07

Kingaroy
Warren Truss Drive
Kingaroy QLD 4610
P 07 41 62 55 01

Mackay
Cnr of Strickland Rd /Mount
Bassett Cemetery Rd
Mackay Harbour, QLD 4740
P 07 49 44 17 26

Noosa
Hollett Road
Noosaville QLD 4666
P 07 54 49 13 71

Toowoomba
43 Vanity Street
Toowoomba QLD 4350
P 07 46 34 13 04

Townsville
69 Tompkins Road
The Bohle QLD 4818
P 07 47 74 51 30



RSPCA Qld fully endorses the submission made by RSPCA Australia and refers Animal Health Australia to that extremely detailed document. As a result of the many deficiencies in the proposed Standards and Guidelines and in particular the RIS, RSPCA Qld is unable to make a recommendation or choose an option at this time.

If RSPCA Qld can provide any additional information, please feel free to contact us.

Yours sincerely

Mandy Paterson

Dr Mandy Paterson
Principal Scientist
RSPCA Queensland

Honorary Senior Fellow, Centre for Animal Welfare and Ethics
University of Queensland

E mpaterson@rspcaqld.org.au **W** rspcaqld.org.au
P 07 3426 9996 **M** 0400 440 595 **F** 07 3258 5610

