

# 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:** 16/02/2018

**Name:** Kerry Chaplin

**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:

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

No    Yes   Comments:

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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:

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

Comments:

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

Comments:

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**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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Does such uncertainty vary between different states and territories?

Comments:

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

Comments:

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**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:

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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:

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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: Because birds will suffer with the lax laws of some states. As a society we value animal welfare, but some states with a higher proportion of industry members who have sway over state governments—birds must be protected from political power plays. The majority of Australians believe animals deserve better treatment and abhor the cruelty and suffering so many birds endure.

**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: Because voluntary guidelines aren't worth the paper they're written on. Essentially, voluntary equals industry self-regulation and disregard for animal welfare (in favour of financial gains).

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

No  Yes Comments: At least it would be a step in the right direction, but would hold little real change.

**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:  
As I mentioned above, Australia is a nation of animal lovers and if everyone understood what was involved in the production of birds, they would be appalled. Making changes, especially those that put an end to a few of the cruelest practices and increasing legal protections, is consistent with the values of 'humane treatment' and 'ethical' that so many Australians hold. The community expects a certain level of care and that birds don't suffer.

11. Do you believe that the net benefits to poultry welfare likely to be achieved under **Option C**, are justified?

No  Yes Comments: Because every incremental step to reducing the suffering of an innocent and vulnerable being is justifiable. Having legally enforceable protections will be an invaluable move in the protection of animal welfare—it's important all animals have protections under the laws of the nation they reside in. This is because it is right, and if we choose to ignore our morals and the pursuit of what is just, we diminish our standing and progression as a society. Science proves that birds (who are

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intelligent and capable of a range of emotions) suffer under so many farming practices—in terms of physical and mental wellbeing.

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

- No     Yes    Comments: Because it's the only option that will make any difference; voluntary standards mean nothing and will lead to no changes. It gives producers no incentives at all to improve welfare, in what could be described as a race to the bottom.

**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: I want it to be 10 years (or better yet, much less than 10!) Really, if we know it's wrong now, we should ban them now.

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, as a combination of other options.

**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: Chickens need space and a cleaner environment, they literally stand in their own feces until they are taken away and killed. Access to fresh air should go along with this.

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: Combination.

**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: They should have these enrichments to their short, miserable lives.

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: Combination.

**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 abhorrent and cruel.

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: Combination.

**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:  
Option C – D, E, F, G

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:

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**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:

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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:

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## **OTHER COMMENTS OR SUGGESTIONS**

Please include any comments or suggestions that you'd like to share.

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