

26 February 2018

Animal Welfare Standards Public Consultation  
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Dear Sir/Madam,

**Re: Public consultation - Australian Animal Welfare Standards and Guidelines for Poultry**

We are writing in full support of RSPCA Australia's submission to the poultry standards and guidelines public consultation.

The RSPCA Australia submission outlines a substantial body of scientific literature on poultry welfare in support of the changes we propose to the standards.

Of particular note is the large body of scientific evidence demonstrating the inherent negative welfare impacts of keeping hens in battery cages (RSPCA Australia submission page 21). RSPCA Victoria strongly supports the **phasing out of battery cages** and is disappointed that this has not been included in the standards. The evidence clearly indicates that phasing out battery cages would substantially improve the welfare of laying hens, provide public confidence in egg production and create investment certainty for the egg industry.

We also strongly support RSPCA Australia's recommendation to **decrease stocking densities for all species of poultry** (RSPCA Australia submission page 45). High stocking densities have a direct negative impact on the welfare of poultry. RSPCA Victoria also strongly supports RSPCA Australia's comments relating to the need to **end beak trimming** (RSPCA Australia submission page 40). While accepting that feather pecking can be difficult to control, we are concerned that beak trimming is a painful procedure that also effects sensory perception, yet beak trimming is regularly used as a management tool. RSPCA Victoria is also concerned with the fast growth rates of broilers and believes that **slowing broiler growth rates** should also be addressed in the proposed standards or guidelines (RSPCA Australia submission page 47), to reduce the significant physical and metabolic disorders fast-growing broilers may experience.

Finally, we would like to raise our concerns about the **standard setting process**. We are concerned with the objectivity and evidence base of the whole process with little regard for furthering animal welfare, as is demonstrated by the lack of contemporary animal welfare science underpinning the standards. In addition to not reflecting current scientific understanding, we do not believe that the standards reflect community expectations regarding the treatment of poultry.

We appreciate your consideration of these important issues.

Yours sincerely,

  
**DR LIZ WALKER**  
Chief Executive Officer  
RSPCA (Victoria)