

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: February 26, 2018

Name: Jarrad Sanderson

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: Several items are listed as only advantages however from being in the industry I have seen that this is not what necessarily happens. For instance yes it's easiest to inspect individual birds in cages however no they don't get assessed individually. Hens in a larger system will be inspected more thoroughly when people walk through barns as these will be the birds that don't move away.

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

No Yes Comments: A much more thorough list is needed than can be provided here. I'm sure one of the welfare groups will be able to make a list and prioritise issues is asked.

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:

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

Comments:

Lack of ability to express natural behaviours, cannibalism through lack of stimulation and inappropriate care from owners.

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:

'Should's' are not enforceable so worthless for either regulation or understanding. Even 'musts' are not enforceable under Western Australian legislation unless the thing in question is covered by the Animal Welfare Act 2002 (AW Act). This creates uncertainty from area to area so clearly identifiable statements and ways to ensure these are carried out need to be created in order for effective regulation Australia wide.

Does such uncertainty vary between different states and territories?

Comments:

Yes, All states have differing powers to make regulations under their various POCTA and AW Acts.

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

Comments:

Unsure. It will however lead to uncertainty about the use of technology or practices throughout the country.

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:

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.

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Comments:

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: Gives international and national communities assurance that the expectations of our society are being met.

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: Guidelines have no impact on behaviour and cannot be enforced so are useless

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

No Yes Comments:

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: They are inadequate as currently presented and constructed for a modern developed country that says it cares about welfare.

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

No Yes Comments: In WA at least this would be ineffectual as stated above due to the structure of the AW Act. Regulations need to be created to have effect. Replacing of the MCOP only may be possible for the guidelines but not the standards.

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

No Yes Comments: If this is the best the working group could come up with then that's all we have to go on. Lets just hope a more progressive group exists next time and that

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it doesn't take another 15 years.

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:

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: Lets not get too far behind places like the EU. The cost will never be born by industry alone but by all of us as consumers.

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: There was research in 2000 from the EU that showed that densities even lower than this were desirable.

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:

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)

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

No Yes Comments:

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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:

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:

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: Lets get with the times, this shouldn't even be up for discussion or needing public input to know the answer

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:
C with DEF and 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:
EU research paper from 2000 into layer systems, RSPCA paper produced recently. I suggest you employ a policy officer to find this

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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:

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:

OTHER COMMENTS OR SUGGESTIONS

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