

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 14, 2018

Name: Julian Johnson

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:

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

No Yes Comments:

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: Biosecurity, however humans are the risk. Good, intuitive husbandry practices will reduce biosecurity risk. For example: a manager that doesn't actively clean up a feed spill will attract wild birds and their unwanted viral and bacterial species.

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: I began in the poultry industry in 2004 and have always used the MCOP's as my guide and reference. I do not believe that MCOP's create uncertainty.

Does such uncertainty vary between different states and territories?

Comments: Not to my knowledge

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

Comments: I don't believe it creates uncertainty between states. Food productionists need to be well aware of the MCOP related to the industry and state and follow through on it. For example: the MCOP for the Transport of Poultry is a document that is quite clear. If there are State specific amendments to that MCOP then Managers in that state need to be made aware of those amendments and abide by them in that state

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.

Comments: No comment

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: "What's good for the Goose is good for the Gander" – there is no argument that we are all Australians and stick together

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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: **No I don't. Voluntary is just that, voluntary. Standards should not be voluntary. Just like road rules aren't voluntary**

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: **Yes, but there are mistakes in it. I'll referer to them later**

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

No Yes Comments:

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

No Yes Comments:

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: **10 and 20 year terms are vastly different lengths though. I'd suggest 10 years.**

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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: **Option D is about confinement. That is not the only criteria in assessing animal welfare. Therefore, as a stand-alone option to improving welfare – we cannot just choose this option alone. I think that this option D should be chosen in combination with C – but also go the 10 year timeframe**

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: **Broilers: Reduction of 10kg/m2 from 40kg/m2 to 30kg/m2 is an obvious improvement to animal welfare**

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: **Option E is about stocking density only. That is not the only criteria in assessing animal welfare. Therefore, as a stand-alone option to improving welfare – we cannot just choose this option. I think that this option E should be chosen in combination with C and D – but also have a transition period of 5 years.**

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:

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: **Option F is about enrichment and natural behaviors only. That is not the only criteria in assessing animal welfare. Therefore, as a stand-alone option to improving welfare – we cannot just choose this option. I think that this option F should be chosen in combination with C, D and E.**

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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: **Option G is about pain only. That is not the only criteria in assessing animal welfare. Therefore, as a stand-alone option to improving welfare – we cannot just choose this option. I think that this option G should be chosen in combination with C, D, E and F.**

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 in combination with D, E, F 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: **Reducing the stocking density by 10kg/m2 poses a reduction of shed space by 25% except in areas where RSPCA's 34/kg/m2 – however that is an accreditation scheme separate from the National Standards. That means we need 25% more shedding to house the same number of birds under current market requirements.**

A 16 shed farm now becomes a 20 shed farm just to maintain the 'status quo' of chicken meat consumption. Managing a 20 shed farm is vastly different to a 16 shed farm – more alarms, more repairs and maintenance, and more walking etc.

That 20 shed farm could now be perceived as a 'factory farm' simply by its size. Integrators will need to get bigger farms to adjust for economies of scale.

Local councils and State Planning will need to be aware that the 'footprint' will grow by 25%. They will need to accept that more truck movements will be required because there is more gas, more bedding, litter removal than there was for the increased stocking density with fewer sheds.

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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: **Depends on the definition of small business. If it's by numbers of employees then No – no issue. However, if the question is defining small business as amount of growing space small, medium, large, then yes it'll have an impact I'm sure because the bigger the better in economies of scale.**

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.

GB 2.1 – or 'no light'. On the evening of a full moon, catchers request 'no light'.

GA 3.7 – 'documented' – what, everytime? Managers walk their sheds three or more times per day – is this clause requiring them to do this every visit to the shed, once per day?

SA 4.5 – uh? How do we stop a bird from defecating on another bird?

GA 4.5 – this enrichment criteria is the biggest load of gobbledeegook. Perches and Dust Bathing only! Music and pecking objects have no use in broilers

GA 4.9 – this is non-sense. The only advice that needs seeking is from the Integrator prior to contracts. If the farmer is not contracted to an integrator then they are personally responsible for adhering to the National Standards

SA 5.3 – I've never seen this one before - 'poisonous plants'? Chickens don't and won't eat poisonous plants!

SA 7.3 – every minute of the day is equally as important. No need to add this clause in

GA 7.6 – 'monitor for eye and nasal irritation'? Must we document that every day as well?
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Glossary – clear definitions of ‘Bedding’ vs ‘Litter’ should be made. Bedding is clean raw material used and has no bird feces on it. ‘Litter’ is that bedding with feces on it. Reuse litter – is bedding that has been defecated on and is being reused as a bedding – but is now called reused litter.

Meat Chickens:

The broiler industry reducing the stocking density from 40kg/2 to 30kg/m² is a 25% reduction that will improve the animal’s welfare. However, it will have wide implications for the farmer, local and state governments, and increase costs (new shedding required, more inputs such as gas, bedding, litter truck movements) – wear and tear on extra equipment. Authorities need to be aware of this proposed change.

It is widely known that supermarkets use ‘loss leaders’ to generate supermarket traffic. They’ve done eggs, milk, bread but are now using chickens – rotisserie chickens. At the moment they are funding the loss. Eggs and milk are by-products of the animal. The chicken is the animal.

Within the last 2 years the way people shop for the Chicken has changed considerably. I call it the Down Down Syndrome where the advertisement ‘down, down prices are down’ use rotisserie chickens to drive traffic. Australians, being in close proximity to Asia, have tended to look for ‘cut up’ products such as breast meat to make the family ‘stir fry’. Under the loss leader of, \$7.90 whole rotisserie chickens offered by the supermarkets, this practice of stir frying has changed to buying whole small chickens - convenience.

The problem with the small chicken is that the ingrained genetics of the bird, in particular the male, is lost when it’s dead. It takes 30 days to grow a 1.8kg bird for the rotisserie market, but only another 20 days (day 50) to get that bird to 3.6kg. How are the integrators going to manage this?

They now need two chickens at 1.8kg to get 3.6kg that they got from one chicken. They buy the genetics for a princely sum yet the supermarkets are destroying those genetics by using rotisserie birds as a loss leader.

On top of that, the reduction of 25% space increases cost and the integrator is placed under even more pressure to pass on the cost increases to the farmer.

If supermarkets respect the life of a chicken they shouldn’t use it as the ‘tool’ to drive traffic. Choose tinned tomatoes instead! Respect the cost to raise animals, charge customers accordingly, and the industry can implement the standards and absorb the increases.

One last thing: SB 2.3

This is the current standard and clearly sets differences between two types of sheds and two different seasons. Under Option E – the reduction of stocking density – there is no differentiation between ‘Tunnel ventilated’ or ‘Other’. That means that 30kg/m² is for everyone.

This could cause a shift in poultry shedding construction and design from Tunnel to ‘other’ and that could be an animal welfare issue right there.

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