

My comments on the Australian Animal Welfare Standards and Guidelines:

- An independent body to oversee drafting and enforcement of animal welfare standards should be created.
- The wording of the Standards is too vague and open to interpretation. Standards need to be clear and enforceable, the examples below show situations where a standard could not be enforced because what is considered 'appropriate tools, methods or actions' is open to the interpretation of the individual. All Standards in the document should be re-worded so that they are applied consistently and can be audited against. Examples of weakly worded Standards are below, however there are many more throughout the document:
 - SA9.14 A person must use the 'appropriate tools and methods' to trim the beaks of poultry. What are these? The Guidelines provide details of the appropriate tools and methods, so why are these not specified in the Standards?
 - SA3.3 A person in charge must ensure 'appropriate action'. What does 'appropriate action' mean? The Guidelines provide this information so why not specify in the Standard?
 - SA4.1 A person in charge must take all 'reasonable action'. Again, too vague. Standards should be specific.
- Guideline GB1.21 should be mandatory. The GB21.21 states that unsuitable weather conditions prevent daily access to the outdoors. Unsuitable weather conditions need to be defined to stop operators unreasonably restricting out door access.