

Submission by Dr Richard Lauder for the public consultation for the draft *Australian Animal Welfare Standards and Guidelines for Poultry*.

The current proposed draft standards fail to meet the community's expectations. They should be improved to rectify this failing.

The Australian Senate recommended the prohibition of battery cages in 1999. This action is now long overdue. The update to all poultry welfare standards should reflect modern management practices which take proper and genuine account of welfare in a transparent fashion, free from bias.

The lack of true commitment to animal welfare in Australia is reflected by the failure of Australia to be rated as highly as comparative nations in the Animal Protection Index, a comprehensive assessment of animal welfare for 50 nations. Rated as a 'C', Australia does not match up to comparative nations such as New Zealand and the UK, rated an 'A'.

The failure by Australia to produce proposed standards that are in touch with modern thinking reflects this low rating. This suggests that an independent regulator is needed to restore public confidence in this process.

The proposed standards should be updated to emulate successful, profitable practices followed by farmers in other countries that place animal welfare as a priority. An example of a modern management system that should guide the aspirations of these standards lies in the Netherlands as can be seen here: <http://www.rondeeleieren.nl/en/> and <http://www.poultryworld.net/Eggs/Articles/2016/12/First-Rondeel-house-six-years-in-production-67521E/>

Comparing the draft standards to successful, profitable examples overseas it is clear that there are deficiencies in the proposed standards, all of which should be addressed:

1. In the proposed standards there is no reference to the phasing out of barren soul-destroying cages. It condemns hens to continue to live in a space the size of an A4 piece of paper, unable to turn or stretch and unable to practice any of their innate behaviours. They will continue to suffer fractured bones due to disuse osteoporosis and it assumes the continuation of the painful beak mutilation process.
2. There is a failure to commit to implement changes to reduce feather pecking and reduce the need for beak trimming through environmental enrichment, appropriate feeding, flock management and appropriate genetic selection.
3. The proposed standards do not address stocking densities of meat chickens, layer hens or turkeys.
4. There is no reference to management of litter conditions to avoid levels of dampness which could cause leg, respiratory or other health problems, despite repeated statements in the RIS regarding concerns about biosecurity. There is no reference to the monitoring of dust or ammonia effecting air quality, or to the requirement for appropriate ventilation standards.
5. There is no mention of temperatures to be maintained within a range which is compatible with welfare of hens, of particular relevance in Australia.
6. There is no update to improve the provision of lighting so that hens can see their surroundings, avoid injury and to allow thorough inspection. Hens are not nocturnal animals.
7. There is no mention of changes to the slaughtering process which prolongs cruelty and provokes further suffering through shackling of hens by their feet, and electrical stunning which is commonly ineffective. This failure will lead hens to be boiled alive in the scalders.

8. The practice of maceration of day old male chicks in grinders will continue without consideration within the proposed standards.

These deficiencies in the draft standards highlight the fact that Animal Health Australia is chiefly concerned with improving market access and biosecurity. To be aligned with community expectations, Animal Health Australia should be focussed on 'minimising risks to the welfare of poultry', the stated aim of this review.

Instead, the standards contain little difference for poultry welfare and the guidelines which accompany them are unenforceable. This is categorically stated in the Regulatory Impact Statement: 'non-regulation of the guidelines is a fundamental premise on which industry engagement and support for this process is based'.

Therefore in its present form, with 50% of the proposed standards no different to the existing standards, and the guidelines being voluntary, it is unlikely that any significant difference to poultry welfare will be made now. There is no proposed update of the standards for ten more years meaning that Australia will only fall further behind the rest of the world.

The standards should be completely re-drafted with reference to real progress in poultry welfare. The quantitative enforceable requirements from the standards should match the qualitative aspirations highlighted in the first paragraph of the summary: 'This Regulatory Impact Statement (RIS) evaluates options for addressing identified policy problems, the main one of which is to minimise risks to the welfare of poultry due to deficiencies in existing codes of practice and other standards in this area'

A re-draft should be objective, quantitative and scientific in terms of delivering the maximum improvement in animal welfare for the maximum number of poultry. All individual hens are effected by behavioural restrictions, whereas other advantages and disadvantages are much less certain and seldom effect all individuals to a similar degree. The objective outcome from this should be to focus on improving behavioural restrictions.

Concerning the RIS, Option B is disingenuous as revealed by the statement in the RIS that 'market signals will generally cause welfare standards to fall below community expectations in the absence of regulation'. The RIS later states that 'because animal welfare is evidently a public good externality there is an obvious role for government policy in establishing and enforcing standards'.

Options C-G are designed to manipulate the public into accepting provisions which suit the industry. They are vague in description, with no clarity of time frame proposed, and they fail to 'minimise risks to the welfare of poultry due to deficiencies in the current codes of practice' and are not in concordance with the OIE's eleven general principles for the welfare of animals.

The RSPCA report regarding the welfare of layer hens is balanced and shows scientific rigour. It is unemotive unlike the vague statements in the RIS such as 'impacts on individual animals is therefore a matter for qualitative judgement' or the statement by the Australian Chicken Meat Federation that the interpretation of animal welfare science is 'influenced by the world view and convictions (values) of the individual reader'. These statements reveal the bias from the influence of commercial vested interests, belittle the reader and are not in touch with the thinking of much of the Australian community.

In summary these proposed draft standards fall short of community expectations, fall short of examples practiced by farmers in other countries and fall short of the stated main aim of the RIS. This needs to be addressed by a complete rewrite driven by a genuine focus on animal welfare.