

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: 22 February 2018

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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 [Comments: We are in general agreement with the risks to animal welfare identified in the RIS. However, the approach to considering risks takes a narrow perspective, rather than considering animal welfare from a holistic point of view, so that a number of risks have not been identified (see below). In particular health is over emphasised (with a greater number of dot points and evidence devoted to health) and animal suffering and opportunity to engage in natural behaviours is underestimated.

Moreover, we disagree with the overall approach taken in the RIS, which is based on 'balancing risks', and which suggests that certain housing systems are more or less risky than other options. An outcome-oriented approach would be preferable to incentivize continual improvements in animal welfare, that is, an approach in which producers are encouraged to continually improve and innovate to meet and exceed welfare standards on all dimensions in whatever housing system is utilised. This would recognize that the same housing systems (barn, cage, free range) can be operationalized in different ways that create different risks and benefits. Moreover it should be the responsibility of producers and researchers to devise ways of continually improving the management and features of every housing system to meet and exceed welfare outcomes, as well as environmental sustainability and public health and safety outcomes. The type of static balance of risks

See:

Mench, J. A., J. C. Swanson, and C. Arnot. "The Coalition for Sustainable Egg Supply: A Unique Public-Private Partnership for Conducting Research on the Sustainability of Animal Housing Systems Using a Multistakeholder Approach." *Journal of Animal Science* 94, no. 3 (2016): 1296 at 1299. See also <http://www2.sustainableeggcoalition.org/>

McGlone, J 2013 'The future of pork production in the world: Towards sustainable, welfare-positive systems'. *Animals*, 3: 401-415.

Scholten, M. C. Th, I. J. M. de Boer, B. Gremmen, and C. Lokhorst. "Livestock Farming with Care: Towards Sustainable Production of Animal-Source Food." *NJAS - Wageningen Journal of Life Sciences* 66, no. Supplement C (2013): 3-5

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

- No Yes Comments: The risks expressed in the RIS do not consider the relative weight that should be given to dimensions of animal welfare such as health, affective suffering and opportunity to engage in natural behaviors. That is, the risks identified do not account sufficiently for the fact that these birds are sentient creatures who suffer.

The risks identified also overlook the more significant systemic risks associated with intensive livestock farming, such as increasing antibiotic resistance due to overuse of antibiotics, rapid evolution of pathogens and adverse environmental impacts due to the large amounts of animal waste produced.

The risks also fail to account for the varied approaches in practice to managing production systems. For example, free range systems currently cover a very wide range of practices with quite different risks and benefits.

Community values, and the risks associated with rapidly changing community values, are also given insufficient weighting. For example, the risk that practices perceived by consumers to be cruel will be increasingly be sidelined by both consumers and by retailers.

See references above.

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:

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:

The main uncertainty created for industry is in the definition of “free range” adopted, which is open to broad interpretation and does not match the definition recently adopted in the new national information standard for free range eggs. Our research on free range labelling suggests that there is still much uncertainty among both industry and consumers regarding the meaning of free range. It is important that the definition of “free range” in the poultry standards should match and amplify the definition in the national information standard in order to provide clarity.

We are particularly concerned that the “free range” standards set out here could essentially outlaw small scale free range, where chickens are out all the time (often protected by Maremma dogs), as the newly proposed standard requires the birds to be confined at night. We recommend that the standard should recognize the different types of free range that exist or at least recognize the possibility to meet welfare outcomes in different ways.

See:

Rachel Carey, Christine Parker, Gyorgy Scrinis, ‘Capturing the meaning of “free range”: the contest between producers, supermarkets and consumers for the higher welfare egg label in Australia’ *Journal of Rural Studies* 54, (2017) 266-275. There is a plain language summary of this research available [here](#). See <http://fvas.unimelb.edu.au/research/projects/regulating-food-labels-the-case-of-free-range-food-products-in-australia/publications#publications>

Christine Parker, Gyorgy Scrinis, Rachel Carey, ‘Free-range egg labelling scrambles the message for consumers’, *The Conversation*, 1 April 2016 at <https://theconversation.com/free-range-egg-labelling-scrambles-the-message-for-consumers-57060>

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

Comments: We believe this uncertainty is de-incentivising innovative new businesses who would seek to develop new models of egg farming that meet welfare goals in different ways to those envisaged by current rules – especially those developing new forms of free range.

RIS location - 2.4.2 Excess regulatory burden

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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: Eggs are a national market and it does not make sense to have different standards in different states. This could just create a "race to the bottom".

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: Enforceable guidelines are essential in order to ensure that every producer complies with minimum welfare standards. Voluntary guidelines would leave the door open for some producers to be non-compliant and therefore to undercut those who are, in good conscience, complying with the minimum guidelines. This is fundamentally unfair and could create an uneven playing field. Producers deserve a level playing field, where they can have confidence that, if others cheat, they will face enforcement action and penalties.

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)

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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: We believe these are an improvement on the current situation. However we do not believe that the proposed standards adequately reflect community values and expectations. A very high proportion of consumers buy free range and barn eggs, which indicates that a majority of Australians are very concerned about the cruelty of barren battery cages and are prepared to pay more to ensure that they are not buying eggs that come from such systems. This should be interpreted as a clear message to government that (i) animal welfare standards should address the cruelty of bare battery cages and that (ii) Australian consumers understand that this may increase costs.

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: Yes this option would put Australia in line with the higher standards internationally in the UK, EU and NZ. It would assist in harmonizing NZ and Australian food standards as is supposed to be happening under the binational food standards regime. It would also alleviate some of the worst suffering for layer hens by providing enrichment in cages – while still allowing plenty of time for industry to adjust and to invest in new equipment. Ideally we would like to see even greater welfare improvements for layer hens (by means of a regime of continuous improvement to meet higher welfare outcome standards) and the eventual banning of all cages (as in Sweden). Of the options proposed Option D (in combination with other options) provides the best starting point.

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: See above.

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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: Much of the worst suffering for layer hens and meat chickens occurs because of overcrowding in barns. Confinement at high stocking densities inside barns and in large flock sizes frustrates natural behaviors and social organization, leading to frustration and stress driven behavior. Lower stocking density and group size within both barn systems and barn plus range systems may provide more opportunity for natural behaviors and less stress.

In addition although meat chickens have not been a focus of public attention to the same degree as layer hens, when consumers are made aware of the degree to which meat chickens are crowded together in very large barns, they have shown discomfort with it (as shown in the meat chicken episode of "For the love of meat" aired on SBS on 20 October 2016). We believe that the meat chicken industry is vulnerable to animal advocacy group campaigns pointing to the crowded conditions in barns and that government and the industry should keep one step ahead.

See:

PoultryHub, 'Enriching the Range to Reduce Feather Pecking', at <<http://www.poultryhub.org/enriching-the-range-to-reduce-feather-pecking/>>.

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: See comments above in relation to Option D. We also believe that meat chickens should be offered enrichment opportunities inside sheds as currently required by the RSPCA Approved standard for meat chickens. Currently meat chickens are crowded together with nothing to do except eat and drink and hardly moving. It would be highly beneficial for the birds to have access to perches and other enrichment opportunities.

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Enrichment opportunities (such as perches and straw bales inside the house or a well managed and vegetated outside range with trees or other structures) provide opportunities for natural behaviors such as perching, scratching, foraging, dust bathing which can also decrease anxiety, boredom and frustration and increase leg health (by encouraging exercise).

See:

A. Robins and C.J.C. Phillips, 'International Approaches to the Welfare of Meat Chickens' (2011) 67 *World's Poultry Sci. J.* 351 at 361.

A.C. Fanatico et al., 'Effect of Outdoor Structural Enrichments on the Performance, Use of Range Area, and Behavior of Organic Meat Chickens' (2016) 95 *Poultry Sci.* 1980.

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:

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?

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Comments:

We support Options D, E, F and G – as these would put Australia in line with EU and British standards and would better reflect the majority of community values.

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:

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: The standards as currently proposed – particularly the definition of “free range” disadvantage small niche producers seeking to provide a high quality, high ethics, outdoors based product. Preventing outdoors based free range egg production would imperil a large range of niche small businesses that supply to high quality restaurants and high value consumers and would imperil Australia’s reputation for excellence in gourmet and ethical produce at the high value end of the market.

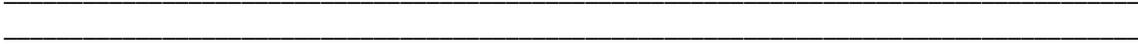
Do you think that any of these options are likely to have a greater impact on small business than other options? Please provide reasons for your answers together with available supporting evidence.

Comments:

OTHER COMMENTS OR SUGGESTIONS

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

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