

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 25, 2018

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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:** The list captures most of the advantages and disadvantages adequately, however, we would dispute the suggestion that in caged laying systems “if disease occurs, it can spread faster in high density systems such as cages”, because cages limit the opportunity for bird to bird spread due to the fewer birds each individual bird is directly exposed to.

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

No Yes **Comments:** A disadvantage inadequately addressed in the RIS is the risk to the rest of the poultry industry from lower biosecurity (and higher probability of disease) in the free range egg laying sector. While the cost of eradicating emergency diseases is raised in the list, the cost (of eradication activities) to other sectors of the industry has not been considered, nor has the cost of disruptions to exports in all poultry sectors. The cost of higher incidence of endemic disease spread to other sectors of the poultry industry has not been addressed either.

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:** Some changes are justified on welfare grounds.

We support the introduction of standards for minimum light intensity (although we disagree with where the standard is set in one respect (see “additional comments” at the end of this submission).

The ACMF has undertaken a detailed analysis of the literature on the relationship between light intensity and welfare presented in the “Farmed Bird Welfare Science Review” commissioned by Agriculture Victoria. This analysis revealed that the majority of the research reviewed fails to support a conclusion that there are significant impacts on welfare of meat chickens (older than 3 days of age) kept at light intensities at 5 lux and above.

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However, the case for potential and more consistent welfare impacts becomes stronger at lower light intensities than 5 lux, and in particular at 1 lux. The evidence in this regard is sufficient for the ACMF to accept that this (1 lux) is probably not a suitable light intensity to rear meat chickens (older than 3 days of age) under, and we therefore agree with the establishment of a minimum light intensity for meat chickens of 5 lux average during light periods. The detailed analysis undertaken by the ACMF in this respect has been provided to the AWTG and can be provided on request.

The establishment of appropriate minimum hours of darkness (4 hrs per day) is supported, so long as the suggested exemptions for meat chickens in some situations remain.

We support the establishment of definitive minimum standards for stocking density and agree with the base case option standards in this respect.

With respect to routine beak trimming, the consequences are quite severe for some sectors in some circumstances if beak trimming were completely banned. Pecking and cannibalism are “innate behaviours” of many species of poultry, but that doesn’t necessarily mean they are good for bird welfare. Where the risk of cannibalism is high, the risks to the welfare of a significant proportion of the poultry flock could be so high as to justify routine beak-trimming.

The risk of contamination of litter with toxic agents is minimal and adequately managed (at least in the chicken and turkey industries, which are most affected by this particular standard). Having a standard in this respect is therefore unnecessary and not justified (even though, as an industry, we have no opposition to this being in a standard). The only concern we have with the standard as written is that it is impossible to 100% guarantee (“ensure”) absence of toxic contamination in litter, regardless of a farmer’s best efforts, as it would be cost-prohibitive and impractical to test every batch of litter for every conceivable toxic contaminant, and there may be risks from previously unheard of or unexpected contaminants in litter that it is simply not possible to plan for and mitigate. A risk-based approach to this is recommended and alternative wording, introducing the concept of ‘reasonableness’ in terms of what a farmer must do to mitigate risks, is suggested in our “ADDITIONAL COMMENTS AND SUGGESTIONS” at the end of this submission.

Exposure of birds awaiting slaughter to adverse environmental conditions could potentially pose a welfare risk that we accept needs to be addressed in standards. In this respect, some environmental hazards will pose more risks than others, and we therefore propose in our comments below (under “ADDITIONAL COMMENTS AND SUGGESTIONS”) that a phase in period apply to the proposed standards. Furthermore, the risks posed to the welfare of birds from exposure to adverse conditions are not ‘instantaneous’; rather, they tend to be ‘cumulative’. The welfare of birds is not immediately at risk from adverse conditions at the moment that they enter the processing plant, therefore we also recommend in our “ADDITIONAL COMMENTS AND SUGGESTIONS” below, that there be a period of

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grace allowed after the arrival of birds at the plant and before they are unloaded into a protected area.

Litter quality is an important contributor to bird welfare, in the case of poultry housed on the floor. It is therefore appropriate to have a standard that deals with litter quality and management. However, it is simply not possible to ensure 100% dry and friable litter under every circumstance – nor is it necessary from a bird welfare perspective; indeed, efforts to achieve such a standard may well result in perverse outcomes for bird welfare, due to excessive shed entries and overworking of litter. Therefore, while we agree that it is justified to include a standard on litter quality and management in these standards, we also strongly believe that the standards need to strike a balance between how far a farmer needs go in order to meet this objective and offsetting risks to poultry welfare from his/her actions in order to achieve this. In our “ADDITIONAL COMMENTS AND SUGGESTIONS” below, we suggest a small change to the wording of this standard to achieve a better balance between these risks.

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

Comments:

As explained above, getting the wording re litter management right is very important, as is providing protection from adverse conditions for birds awaiting slaughter.

Are there any other areas of concern to poultry welfare? Please provide reasons for your answers, together with supporting scientific evidence.

Comments:

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 existing MCOP is clear and doesn't create uncertainty, although it fails to provide guidance with respect to lighting (duration and intensity). The chicken industry essentially adopts the “musts” (and in fact the “shoulds” in almost all situations) in the MCOP as if they are regulatory standards anyway.

The current arrangements (whereby each State legislates poultry welfare in a different way) is difficult to explain to customers and the public who are concerned that there may be inadequate oversight of poultry welfare. This is not desirable. There will remain some issues in this respect, even after implementation of the S&Gs, because each state will use different legislation to put these standards into effect. Nevertheless, if the principle of consistent outcomes in legislation is adopted, then our ability to describe the regulatory system in place across Australia will be improved.

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Does such uncertainty vary between different states and territories?

Comments:

There is uncertainty in terms of what is picked up in regulations in different states and territories and what is not. This does not so much have an impact on the practices implemented by industry across Australia, but impacts more on our ability to explain to customers and the public the regulatory arrangements that are in place to ensure government oversight of poultry welfare in Australia (and specifically what is and what is not mandatory in different jurisdictions).

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

Comments:

We have no current (or past) examples in the animal welfare area. However, we can foresee significant issues if different standards are implemented by different states at the conclusion of this standards and guidelines process. For example, if one state were to implement a very different maximum stocking density to other states, chicken producers could be put at a significant competitive advantage / disadvantage *vis a vis* producers in other states. Productivity of farm units and cost of production is significantly impacted by stocking density. If one state implemented a compulsory maximum stocking density significantly lower than is adopted in other states, producers in that state could be put at a significant disadvantage (assuming there are no regulatory impediments to export of chicken meat into that state). This could result in major disruptions to where chicken is produced, as explained below.

For companies that have chicken production operations in more than one state, one solution (to loss of competitiveness in chicken meat production in that state) would be to produce more in another state and “export” product from the more productive state to the state in which they are less efficient/productive due to a lower stocking density. The level of disadvantage would obviously have to be sufficient to outweigh the freight cost in order to justify this (for example, a 2 kg/m² difference in density would be sufficient to cover the cost of freight from any one state to any other currently). For such companies, their investments in the state with the lower density would obviously be threatened under this scenario. They may also be subjected to competition from other companies which do not currently operate in that state but for whom the differential in productivity is sufficient to allow them to export to the state competitively whereas previously they could not.

For companies which do not have chicken production operations in other states, they may find it difficult to maintain their market share, due to competition from products “imported” from other states. This could be sufficient to put them out of business, or to relocate to another state.

In either of the above scenarios, (resulting in loss of market share of “locally” produced chicken meat to chicken meat supplied from other states) growers in the affected state would likely be impacted, leading to loss of investment and livelihoods in this sector.

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All of the above will lead inevitably to an expansion of the industry in other states at the expense of the industry in the “lower density” state, with a consequent reduction in the contribution of the industry to the economy of the state which

The above would not happen overnight, but will inevitably happen and could happen quite quickly; the extent and speed of contraction in the “lower density” state partly dependent on the differential between the standard applying in that state vs the standards applying in the rest of Australia.

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: ProTen; RFM (both corporate growers). Darwalla Poultry (NSW and Qland); a couple of large growers.

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:

One example might be the regulatory hurdles faced in different states (and different councils) in order to obtain planning permission to build new farms (or expand existing farms), which can impact on the cost of a development, and is one of the reasons behind the geographical shifts of the industry that have been witnessed over the past decade.

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: Consistency is needed to create a level playing field for producers across Australia. Inconsistencies between jurisdictions in welfare standards will impact on the productivity and efficiency of chicken producers in different states and artificially distort where it is most efficient to produce chickens and therefore where the industry grows/contracts in the future.

Also, consistency facilitates more effective communication of what standards producers must meet and a better understanding across the industry of what standards must be achieved.

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 be achieved under **Option B**, are justified?

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No Yes Comments:

There are some worthwhile new provisions in the proposed new standards and guidelines that are worthy of inclusion in the chicken industry's voluntary guidelines and will result in some welfare benefits at an acceptable cost to industry.

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

No Yes

Comments: The chicken industry agrees that provision of some certainty with respect to the standards that apply justifies the costs of Option C, and on balance this option is preferable to Option B. Option B is certainly preferable to Option E, the cost of implementation of which would impose a significant cost burden for chicken meat producers and consumers, while achieving little in terms of poultry welfare outcomes. However, there are some elements of Option G (specifically banning castration, pinioning and devoicing) which could also be justified.

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:

We do not believe that there has been sufficient work done to establish what community values and expectations are with respect to acceptable treatment of poultry, so it is difficult to answer this question with any certainty. Furthermore, we challenge whether community beliefs and expectations even necessarily equate to good welfare outcomes from the bird's perspective in all cases.

Furthermore, one 'community expectation' that we feel has been overlooked to date is the expectations of consumers regarding poultry product pricing and affordability. Consumers have come to accept that the \$8 bbq chicken at the supermarket as a 'given'. How much would they be prepared to pay for changes in practice? While the RIS spells out the costs of implementation of various options, these costs have not been expressed in terms of what they will ultimately mean in terms of the price that consumers will need to pay for their poultry products, and it seems that the research necessary to determine how the majority of consumers feel about paying the extra costs associated with the implementation of particular standards, when it comes to the checkout, has not been done.

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

No Yes Comments:

On balance, the chicken industry agrees that provision of some certainty with respect to the standards that apply justifies the costs of Option C, **provided some changes are made** (see "ADDITIONAL COMMENTS AND SUGGESTIONS" below).

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

No Yes Comments:

We agree that Option C, **with the changes suggested below** (see "ADDITIONAL COMMENTS AND SUGGESTIONS" below) provides for the best balance of costs and benefits.

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: While this does not affect the chicken meat industry, it appears from the list of advantages and disadvantages provided in Part 2.3.1 of the RIS that the welfare benefits under Option D may be small, if positive at all. On the other hand, it is clear from the RIS that the costs of implementing Option D, irrespective of the period of phase in, would be significant.

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:

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: We challenge whether **any** benefits to poultry welfare would genuinely and consistently be delivered by option E, let alone that they would justify the huge cost of its implementation, as documented in the RIS.

How the space that the birds have available to them is managed is more important than how big the space is, as clearly demonstrated by the work undertaken in commercial meat chicken farms in the UK by Prof Marian Dawkins and co-workers (e.g. Dawkins, M., Donnelly, C., and Jones, T. (2004). Chicken welfare is influenced more by housing conditions than by stocking density. *Nature*, 427: 342-344; Jones, T., Donnelly, C., and Dawkins, M. (2005). Environmental and management factors affecting the welfare of chickens on commercial farms in the United Kingdom and Denmark stocked at five densities. *Poultry Science*, 84: 1155-1165). This group's work clearly demonstrated that, under commercial conditions, stocking density has less impact on meat chicken welfare than management of the environment within the barn.

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There is no “linear relationship” between animal welfare and density, as claimed by the RSPCA in the RIS. Indeed, the RSPCA failed to provide any references to support such a claim. Furthermore, the majority of the (selectively chosen) references cited by the RSPCA tell us nothing about the comparative advantages/disadvantages of 30 vs 40 kg/m², as many of them compared densities outside this range, or only found differences between densities outside this range eg reference 400 cited in the RIS clearly shows that densities >47kg/m² cause negative welfare outcomes but there was substantial variability or no clear difference in the results for birds held between 23-47kg/m²; reference 405 reports on a study which compared densities of 8, 20 and 30kg/m² and in which stress was deliberately induced on day 46 and the response measured to come up with a statement to the effect that high stocking density caused acute stress at 30kg/m². As pointed out by Rault *et al.* (2017), provided as supplementary information to the public consultation, the results of studies on the impacts of density under commercial conditions suggest that stocking density has little effect on several key welfare indicators (mortality, walking ability, skin conditions, jostling), at least at stocking densities used in Australia (ie max 40 kg/m²), whereas results obtained in the laboratory have provided a large amount of contradictory information on the impacts of stocking density on variables such as growth rates, feed intake, leg pathologies (walking ability and skin conditions), measures of physiological stress and fear, and time budgets for major activities.

The ACMF has conducted a detailed analysis of 75 out of the 78 papers cited in Section B9.1 (stocking density for broilers) of the “Farmed Bird Welfare Science Review” commissioned by Agriculture Victoria (2 papers cited could not be sourced and two references cited as separate publications in the Victorian Review were in fact the same paper). Additionally, the literature cited in the “Farmed Bird Welfare Science Review” was mapped the literature cited in the review by Rault *et al.* (2017). This analysis confirmed that the scientific literature does not provide a clear critical density from which point on meat chicken welfare is decreased. It certainly does not support a critical density of 30 kg/m², nor does it support a critical density of 33 kg/m², as implied in the Victorian review.

Rather, a detailed analysis of the literature supports the contention that achieving good welfare and production outcomes for meat chickens is influenced more by how the space and environment available to the bird is managed rather than the stocking density *per se*.

The detailed analysis undertaken by the ACMF in this respect has been provided to the AWTG and we are happy to make it available on request.

In summary, therefore:

1. A reduction of density to 30kg/m² for meat chickens (RIS Option E) is not supported by the scientific literature - it is not supported by either the recently published Victorian literature review nor the RIRDC review published in 2017, and it is not clear why this density was even suggested.
 - There is no doubt that stocking density can have an impact on a chicken’s welfare (and particularly at densities above 40kg/m²), but the science

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underlines how important it is to not focus on stocking density per se in isolation.

- Research conducted under commercial conditions clearly shows that other aspects of the chicken's environment are equally if not more important than density in ensuring good bird welfare (see literature cited above as examples), in particular litter quality and ventilation and the quality of the stockmanship, which is paramount.
 - In Australian chicken farms, the level of management of air quality, ventilation, temperature, humidity and litter quality is not at a baseline level or 'worst case'; it is sophisticated and effective.
 - It is certainly the case that it gets 'harder' to manage the space available to birds to maintain good welfare outcomes above certain densities, but higher density does not equate to poorer welfare; nor should density limits be set for the lowest common denominator.
 - While it may be 'easier' to manage the welfare of birds at lower densities, that doesn't mean that the welfare of birds at higher densities is compromised, because stockmanship and management of the flock's environment is such a critical factor in determining welfare outcomes. There is substantial risk in promoting complacency by reducing density to accommodate for poor stockmanship.
 - The fact that some producers are able to achieve excellent animal welfare outcomes at densities **above** 40 kg/m² is reflected in policy makers approach to density in the European Union, where a maximum of 42 kg/m² is permitted, but only if specific welfare outcomes (maximum mortality rates) are met.

2. Were a maximum stocking density of 30 kg/m² to be imposed on industry (Option E), there would be a number of significant negative ramifications for the industry, consumers and the Australian economy. The costs of this, as pointed out in the RIS, would be huge. Over a 10 year period, this option would cost the industry over \$1.5 billion, and this would ultimately need to be passed on to the consumer by way of increased prices. The ACMF believes the costings provided in the RIS in this respect (at least for the chicken industry) are reasonably accurate.

3. Even if companies aim for (and place birds so as to achieve) a maximum stocking density of 40 kg/m² as proposed in Option C, they need to build in a buffer of a couple of kg/m² below the mandatory standard, to ensure that they and their farmers are not prosecuted because they inadvertently ended up crossing the 40 kg/m² maximum density target, for example, because

- the grower did a particularly good job rearing his flock and had a lower mortality or higher growth rate than had been expected, or
- because the processing plant doesn't operate over weekends, meaning that either too many birds would need to be processed on a Friday than there is capacity for, or birds need to be kept over the weekend. This situation is exacerbated on long weekends; or

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- due to the inherent inaccuracy (due to sample size, uniformity of the flock and location of sampled birds within a shed) of on farm bird weighing, often used to forecast or predict densities at pick-up.
- Pick-up variance.

Simply making the 40kg/m² a regulatory standard (as per Option C) means that companies need to aim for a lower placement density e.g. 38 kg/m², to ensure that they are always inside the 40 kg/m².

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: As described above, it has not been proven that welfare benefits would necessarily be derived from reducing density to 30 kg/m², whereas the very substantial costs of such a change have been clearly documented in the RIS. Insofar as meat chickens go, that cost of Option E does not justify the possible welfare benefits.

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: No comment

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: No comment

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?

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- No Yes Comments: While there are welfare benefits from banning castration, pinioning and devoicing, in reality these are practices that are rarely employed, that we are aware of – **they are certainly not employed in the commercial chicken industry.**

With respect to the matter of banning routine second beak trimming, this could deliver net benefits, as long as it does not lead to producers being excessively cautious in using this as a means of preventatively managing pecking and cannibalism. **To overcome this, it is suggested that the wording of this provision be modified, perhaps by removal of the words “except in exceptional circumstances” (which implies that there already has to have been a major outbreak of pecking...at which point this action may be too late anyway) and by insertion instead of the words “following a documented risk assessment by an appropriately qualified person”.**

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: In combination with Option C, the inclusion of this option (modified as suggested above) could deliver net benefits which the ACMF could support.

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:

Option C is preferred, assuming the changes detailed in our “ADDITIONAL COMMENTS AND SUGGESTIONS” at the end of this submission, are made, in combination with Option G, provides the greatest net benefit.

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: As mentioned previously in this submission, the ACMF has undertaken detailed analyses of the literature surrounding the effects (or lack thereof) in the areas of stocking density and light intensity. These detailed analyses have been provided to the AWTG and the ACMF is happy to make these available on request.

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?

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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

- The ACMF believes that Option C (with the addition of option G, but **without** the addition of any other options D – F) comes closest to achieving the best combination of welfare benefits and costs. However, several changes need to be made, and in two instances, phase in periods to be applied, before the standards will truly achieve an appropriate balance between these factors.

Without the changes / phase in periods identified in the table below, we would argue that the costs of Option C do not justify the potential benefits, particularly as the way they are currently worded could lead to prosecution of farmers for petty or uncontrollable situations which have minimal or no impact on bird welfare and in some cases could result in perverse outcomes. Some of the changes proposed below seek to strengthen the standards from a bird welfare perspective.

Without these changes our position is that the proposed standards and guidelines should become guidelines only (ie Option B), as the potential benefits do not outweigh the costs.

These are the changes that need to be made to Option C to make it the standards workable and justify the costs:

Clause	Current Wording	Reason a change is needed	Suggested alternative wording / approach
SA6.2	<i>A person in charge must ensure that the light intensity for</i>	<ul style="list-style-type: none"> Light intensity is not always evenly distributed across a shed, and a single measurement of light intensity at any one point in a shed is unlikely to be 	<ul style="list-style-type: none"> The standard must clarify that the 20 lux is an 'average' ie "A <i>person in charge must</i>

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	<p><i>young poultry for the first 3 days after hatching is at least 20 Lux</i></p>	<p>representative of the light intensity in the shed overall or at all points in the shed. The fact that light intensity varies across the shed is not in itself a problem – in fact, there is recent evidence to suggest that this is desirable from a bird welfare perspective – but it does complicate measurement, interpretation and enforcement of this standard. Standard SA6.3 already acknowledges this, in clarifying that the minimum light intensity that applies is an average. SA6.2 similarly needs to clarify that the 20 lux minimum is an average.</p> <ul style="list-style-type: none"> • There will be a significant cost burden upon some growers in meeting this standard. This cost derives from the need, in the majority of impacted cases to rewire sheds, including to provide more light points, and in some cases to completely upgrade the power supply to the entire farm. This will mostly impact on farmers with older sheds, who will also most likely be smaller enterprises, and the cost to individual affected farmers would be very substantial. Therefore, a phase in period is needed, to allow farmers affected by this standard time to invest in this upgrade, or if investment to upgrade existing facilities is not considered worthwhile, to invest in completely new facilities. 	<p><i>ensure that the light intensity for young poultry for the first 3 days after hatching is at least 20 lux, <u>on average</u></i>”.</p> <ul style="list-style-type: none"> • There must be a “phase in” period of at least 5 years post S&G sign-off for this standard, to allow necessary facilities to be modified or replaced.
<p>SA6.3</p>	<p><i>A person in charge must ensure that the light intensity for poultry is at least 5 Lux on average during light periods</i></p>	<p>There needs to be an exception to this standard to allow light intensity to be used to manage a severe outbreak of pecking (which leads to cannibalism) in breeder chickens and in turkeys. Outbreaks of pecking result in significant negative impacts on bird welfare and to increased mortality in flocks. There are</p>	<p><i>“A person in charge must ensure that the light intensity for poultry is at least 5 Lux on average during light periods, except where, under veterinary supervision and for a short period only, light intensity</i></p>

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		<p>few other measures, other than reducing light intensity, that are available to farmers to control an outbreak of pecking once it has started. Provision needs to be made in the standard to allow light intensity to be used specifically for this purpose. To ensure that this exception is not misused, it is suggested that it only be allowed under veterinary supervision and only for short periods of time (not the life of a flock). A suggested revised wording of this standard which encapsulates those safeguards is provided at right.</p>	<p><i>is reduced to control an outbreak of pecking in breeders or turkeys”.</i></p>
<p>SA6.5 and SB2.1</p>	<p><i>A person in charge must ensure poultry except for meat chickens, emus, ostriches and quail are exposed to at least 4 hours of continuous darkness within a 24 hour period.</i></p> <p>and</p> <p><i>“A person in charge must ensure that after 7 days of age, lighting patterns must encourage activity. and provide a minimum period of 4 hours of continuous darkness each day except on the day of pickup (meat</i></p>	<p>Under standard SA6.5, the exemption from 4 hours of continuous darkness each day is applied to meat chickens generally, whereas (a) the original intention was that the exemption would apply only to meat chickens up to 7 days of age, and (b) there is a conflicting statement at SB2.1 that says: “A person in charge must ensure that after 7 days of age, lighting patterns must encourage activity. and provide a minimum period of 4 hours of continuous darkness each day except on the day of pickup (meat chickens) and meat chickens during very hot weather”.</p> <p>The ACMF believes that these standards should be amended to remove the conflict between what they say. A possible alternative wording, that encapsulates this, is provided at right.</p>	<p><i>“A person in charge must ensure poultry are exposed to at least 4 hours of continuous darkness within a 24 hour period, except for emus, ostriches and quail, and meat chickens SA6.5 A person in charge must ensure poultry are exposed to at least 4 hours of continuous darkness within a 24 hour period, emus, ostriches and quail, and meat chickens after 7 days of age or on the day of pickup or during very hot weather”.</i></p> <p><i>SB2.1 could either (b) be deleted or (b) retain what remains of its original intent: “A person in charge must ensure that lighting patterns must encourage activity”</i></p>

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	<i>chickens) and meat chickens during very hot weather”</i>		
SA7.2	<p><i>A person in charge must ensure that mechanically ventilated sheds have;</i></p> <p><i>1) a back-up power supply that is tested weekly; and</i></p> <p><i>2) automatic alarm systems to warn immediately of ventilation failure; and</i></p> <p><i>3) have a system in place to respond and take action at the first reasonable opportunity</i></p>	<ul style="list-style-type: none"> The necessity for an automatic alarm system to warn of ventilation failure should only be necessary if the ventilation system is fully reliant on mechanical ventilation. If ventilation system is managed ‘manually’ eg by the farmer lifting or lowering the curtains in curtain-sided sheds, then a failure in ventilation is not a failure of the equipment, but a failure of his management, and an automatic alarm system to warn of ventilation system failure is superfluous. It is therefore suggested that the requirement for automatic alarm systems for ventilation system failure should only apply where airflow is solely reliant on the mechanical ventilation systems. “Mechanically ventilated” needs to be defined (this applies to other standards as well as here) – does it only apply to tunnel ventilated housing? Does it include stirring fans? Does it include curtains that need power to be operated? We suggest that it be defined in the glossary as housing having any ventilation component that requires power for its operation. 	<p><i>A person in charge must ensure that mechanically ventilated sheds have:</i></p> <p><i>1) a back-up power supply that is tested weekly; and</i></p> <p><i>2) a system in place to respond and take action at the first reasonable opportunity.</i></p> <p><i>Additionally, where airflow is solely reliant on mechanical ventilation, there must also be automatic alarm systems that warn immediately of ventilation failure.</i></p> <p><i><u>Mechanically ventilated</u> – to be defined in the glossary as having any ventilation component that requires power for its operation.</i></p>
SA8.2	<p><i>Where litter is used, a person in charge must ensure the risk of contamination of litter with toxic agents is minimal.</i></p>	<p>We strongly oppose this standard as worded.</p> <p>Testing a significant sample of 100% of all litter (a) received and (b) once in the shed, for known toxic agents would be cost prohibitive. What about previously unknown or unheard of potential contaminants? This standard as it is written would require testing for every</p>	<p><i>“Where litter is used, a person in charge must take reasonable measures to ensure the risk of contamination of litter with toxic agents is minimal”.</i></p>

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		conceivable substance that could be toxic for chicken, irrespective of the risk, and there may not be tests even available for some potential contaminants. We therefore suggest that this standard to be reworded to make it clear that the action that needs to be taken to ensure the risk of toxic agents in litter is minimal should meet the criteria of “reasonableness”.	
SA8.3	<i>Where litter is used a person in charge must manage litter to avoid excessive caking, dustiness or wetness that impacts on the welfare of poultry.</i>	<p>We accept that litter management is extremely important in ensuring good poultry welfare outcomes. However, we oppose the current wording of this standard, as it is not possible to consistently avoid wet litter in all circumstances on all farms. For the majority of housing, the standard is achievable, but in some sectors (eg free range farms, and older shedding in some areas), the current facilities may not be able to achieve this consistently. To rectify this and comply would require infrastructure upgrades, particularly to the ventilation (eg retrofitting to tunnel ventilation) and/or removal and replacement of affected litter, and/or working of the litter (including the purchase of litter conditioning / tilling equipment), with the latter option often having negative impacts on bird welfare. This standard would impact most on free range farmers and farmers with older (and generally smaller) farms.</p> <p>This issue is simply addressed by replacement of the word “avoid” with “minimise”, as suggested in the alternative wording at right.</p>	<i>“Where litter is used a person in charge must manage litter to minimise excessive caking, dustiness or wetness that impacts on the welfare of poultry”</i>
SA9.10	<i>A person must not pluck live poultry.</i>	For the purposes of monitoring flock health, poultry veterinarians sometimes need to remove some feathers from birds to obtain a diagnostic sample for testing, or to apply a diagnostic test. Monitoring flocks for evidence of disease exposure is	<i>“A person must not pluck live poultry, other than removal of small areas of feathers for the purposes of collection of diagnostic”</i>

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		an essential tool in managing the overall health and welfare of individual flocks and protecting the national poultry flock more broadly. An exception to this standard needs to be made for the removal of small areas of feathers from birds for this purpose.	<i>samples or for diagnostic testing</i> ".
SA9.19	<i>A person must treat hatchery waste, including unhatched embryos, quickly and effectively to ensure the rapid killing of all unhatched embryos.</i>	The intention of this standard is for anything that might be 'alive', including embryos, to be quickly and effectively killed. That is reasonable. However, hatchery waste includes waste from a number of areas in the hatchery which are often ultimately comingled. This includes infertile eggs, which means eggs that have no living embryos in them. These are usually detected and removed at transfer (from the incubator to the hatcher) at 18 days of incubation, in the case of chickens. There should be no requirement to "treat" this waste stream (at least from an animal welfare perspective) as there is no animal or embryo involved. An exclusion from this standard needs to be made for infertile eggs, and a suggested wording that achieves this is provided at right.	<i>"A person must treat hatchery waste, including unhatched embryos but excluding infertile eggs removed at transfer, quickly and effectively to ensure the rapid killing of all unhatched embryos"</i> .
SA11.6	<i>A person must ensure that if there is an extended delay in slaughtering, alternative arrangements are made for slaughter at an alternative facility, or humane killing.</i>	This standard does not allow for the option of return of birds awaiting slaughter to a farm in the event of an extended delay in slaughtering. While this will not generally be an available option or indeed the best option for the birds in terms of bird welfare, in some cases it could be. It is an option provided for in the Land Transport Standards, and should be allowed in these standards.	<i>A person must ensure that if there is an extended delay in slaughtering, that is likely to result in poultry over being held in containers for more than 24 hours, alternative arrangements are made for slaughter at an alternative facility, humane killing, or return to a farm.</i>
SA11.7	<i>A person must ensure all poultry held awaiting</i>	We accept that processors need to protect birds from adverse conditions while awaiting slaughtering. However, there needs to be some allowance for	<ul style="list-style-type: none"> <i>"A person must ensure that, after 30 minutes from the time the truck that delivers the poultry</i>

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	<p><i>slaughtering must be protected from direct sunlight, radiant and reflected heat, and adverse weather such as rain and wind.</i></p>	<p>trailers to be unloaded into the lairage or other protected area once trucks carrying birds arrive at the plant, as it is not always possible to precisely schedule the arrival of trucks carrying birds into the plant so that they can be always be unloaded immediately.</p> <p>We propose that there should be an allowance of 30 minutes from the time a truck is logged in at the weighbridge to when it is unloaded before the requirement for protection “<i>from direct sunlight, radiant and reflected heat, and adverse weather such as rain and wind</i>” commences. An alternative wording that encapsulates this is provided at right.</p> <p>While all major processing plants have facilities in which birds can be protected from direct sunlight and rain, in some cases the expansion of their production has meant that these facilities are not always large enough to ensure that 100% of the birds have immediate access to this protection, or that there is adequate protection from reflected heat. The industry is prepared to work towards this objective however and invest in the upgrading of facilities to achieve this. However, the investment will be significant for affected plants, and we require a phase in period of at least 5 years post S&G sign-off for full implementation of this standard.</p>	<p><i>to the processing plant is logged in at the weighbridge, all poultry held awaiting slaughtering must be protected from direct sunlight, radiant and reflected heat, and adverse weather such as rain and wind”.</i></p> <ul style="list-style-type: none"> • There must be a “phase in” period of at least 5 years post S&G sign-off for this standard, to allow the necessary facilities to be created, expanded or modified to fully and consistently comply with its intent.

2. Draft standards section 11.

Regarding section 11 of the standards and guidelines “Poultry at slaughtering establishments” (and other than for the comments in the Table above relevant to standards 11.6 and 11.7), the ACMF would like to make the following comments.

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We note that some individuals and groups have publicly criticised the standards as they relate to processing, but have not indicated in what way the standards themselves are deficient.

The ACMF strongly rejects these broad, vague and unsubstantiated claims.

The draft standards cover the major welfare concerns that could arise at the processing plant. Importantly, they require that birds are carefully handled before being stunned (SA11.1), are effectively stunned so as to be rendered insensible to pain before being killed (SA11.2 and SA11.8) and are dead before they enter the scald tank (SA11.8). We fail to see in what way these standards are deficient. The current draft standards clearly state what a processing plant must achieve; they do not need to prescribe how a processing plant goes about achieving that outcome. To use an analogy, our road rules state that a driver must not drive at a speed over the speed limit. They don't also go on to say that a driver must apply the brakes when approaching the speed limit, or that the driver must only accelerate at a maximum rate for a specified period of time. We need straightforward laws that make it clear what the outcome is that needs to be achieved, not complicated rules that unnecessarily prescribe the minutia of how someone might go about achieving that outcome.

We note that there have been calls for processing plants to have video surveillance in the live bird handling part of the processing plant, and we agree in principle with this. In fact, to facilitate compliance with appropriate handling procedures in this area of the plant, over 5 years ago, the ACMF recommended to its chicken processing companies that they install video monitoring of the live bird handling area in all of their plants, to ensure that bird welfare standards are being met. All the major meat chicken processing plants in Australia already have video monitoring in this area to ensure that any inappropriate handling of birds can be detected and acted upon. Noting that the value of video surveillance is actually in what a processing company does with or how it uses the video footage, not whether it simply has it in place, we don't see that this is appropriate to include as a standard, but rather could be included as a guideline.