

# 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

**Name:** Jodie Redcliffe, acting President, Australian Chicken Growers Association (ACGC) on behalf of ACGC

**Contact information** 0408758602

### 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: N/A

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

No  Yes Comments: N/A

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:

- a. Lighting: ACGC supports the introduction of minimum standards for light intensity to 5-lux average during light periods. Appropriate minimum hours of darkness are also supported, with exemptions for circumstances beyond the grower's control.
- b. ACGC support the establishment of minimum stocking densities and support a base case option of 38kg/m<sup>2</sup>. This minimum standard needs added terminology to allow for a breach in an event beyond the grower's control.
- c. It is not possible to quantitatively say that litter is 100% free of contaminants therefore we oppose the wording of this standard and suggest a change to "...a person in charge must take reasonable measures to ensure that..."
- d. It is not possible to ensure that 100% of litter is dry and friable at all times, therefore we oppose the wording of this standard and suggest a change to "...where litter is used a person in charge must manage litter to avoid and minimize excessive caking, dustiness or wetness that impacts on the welfare of poultry." ACGC maintain that dry and friable litter is not an indicator of bird welfare, and therefore a standard for 100% dry and friable conditions is unnecessary. Multiple shed entries to manually work litter to achieve such an unrealistic standard will have adverse bird welfare effects therefore there must be a practical balance of this measurement.

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

Comments: Suitable stocking densities and good litter conditions have the most effect on bird welfare.

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

Comments: Chain of responsibility for animal welfare: ACGC acknowledges that the chain of responsibility within the contract meat chicken industry may seem unclear, given that the farmer never takes official ownership of the birds. For this reason it is essential that there is clear definition of who is responsible for the welfare of the birds. To state that under the current animal welfare framework 'nobody is held accountable within organizations for adverse animal welfare outcomes' is not correct. For the time that the birds are under the care of the contract farmer, the contract farmer is wholly and totally responsible for the welfare of the birds. At the point in time when responsibility is handed over to the processor pick-up crew, ACGC would like the animal welfare standards to acknowledge that the grower is no longer responsible for the welfare of the birds even though the birds are still physically on the farm until the loaded trucks depart. This is a grey area not addressed in the Land Transport of Livestock Act, and ACGC believe it should be addressed in the animal welfare standards.

#### **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 MCOPs have been adopted and are used diligently by contract farmers. Contract farmers risk penalties from their processor, up to and including loss of contract if MCOPs (written into Broiler manuals of individual processors) are not followed. Therefore MCOPs are quasi-regulatory in the opinion of contract growers represented by ACGC, and currently provide certainty.

Does such uncertainty vary between different states and territories?

Comments: The majority of processors operate nationally and adopt national standards, therefore there is little practical difference between states and territories. State legislation may certainly vary depending on what of the MCOPs has been adopted, but contract farmers operate under strict, national processor requirements. Uncertainty comes from individual state jurisdictions interpreting MCOPs differently when assessing planning requirements.

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

Comments: If different states were to adopt quite different standards (in particular with regard to stocking density) as a result of this review, there is the danger that processors would mitigate

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implementation costs by moving production to 'cheaper' states. The impact for contract farmers would be devastating: farmers have invested many millions of dollars in specific chicken farming assets that cannot be moved. As has been seen in the past two years, when a processor moves production from a state, the contract farmers lose their livelihood and their investment (Baiada exited Victoria in March 2016 and South East Qld in January 2018). Therefore the risk of implementation of a standard, if not unilaterally supported by processors can be devastating for farmers. Alternatively, processors may expect and require farmers to absorb all the costs of implementation, which would force some farms out of business because they would be unable to maintain viability and profitability.

As farmers we acknowledge that decreasing stocking density is a desirable outcome for the community whose views are represented by consumer groups involved in the RIS. However, decreased stocking density must also be supported and costed appropriately by processors, and those costs must be ultimately passed on to end consumers of chicken meat.

#### 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 and RFM (corporate contract growers in Victoria and NSW), Darwalla Poultry (processor in Qld and NSW)

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: Differing state planning policies and local government planning regulations have significantly impacted development of the chicken meat industry, and have lead to marked concentration of processor and grower facilities in certain areas. This is severely detrimental to contract farmers. In some cases it has meant farms cannot expand, or it is cost-prohibitive to do so, therefore they cannot achieve economies of scale or modernize their facilities to processor requirements. In other cases it has meant that the processor has moved to where grower facilities have been able to grow larger and more advanced, resulting in the loss of livelihood for growers left in the non-expandable areas. In those areas where a processor has concentrated its' operations, those contracted farmers have little or no choice in who to contract to therefore they are forced to enter into suboptimal contracting arrangements with an imbalance of competitive bargaining power. This has lead to a depression in prices paid to farmers and farmers having to bear the majority of costs of implementation of changing standards.

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: There is definite need for national consistency as growers predominately contract to national companies. It will allow for clarity in

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requirements, and increases viability of implementation and uptake of any changes. ACGC also wish to ensure regulatory consistency with Land Transport of Livestock Act so that all contract growers are protected from potential litigation when they transition from complete custody of the birds, to the catching and transportation phase. Once the processor triggers the catching process the contract farmer has little control over the process, as the farmer is required to fulfill the instructions of the processors who are the owners of the birds.

**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: ACGC are generally supportive of the new provisions in the proposed standards and guidelines and expect that they will be incorporated into voluntary guidelines that will result in some welfare benefits that (with the support of the processors) will be at an acceptable cost to individual farmers.

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

- No     Yes    Comments: We are supportive of the provision of certainty with respect to the standards that justifies the costs of Option C. On balance this option is preferable to Option B. Option B is preferable to Option E. The cost of implementation of Option E would impose a significant cost burden for chicken meat farmers, processors and consumers, while achieving little in terms of poultry welfare outcomes.

**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: Community values and expectations of acceptable treatment of poultry are driven by community groups with an agenda to alter our industry entirely with little regard for respected science and cost-benefit analysis. It does not even equate to good bird welfare outcomes in all cases. Consumer expectations of the price of chicken meat has been groomed by the two major supermarkets with no acknowledgement of how welfare mandated changes in farming practices should increase prices. 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. Higher welfare options for the production of chicken meat mean a higher cost of that product to the consumer. If this cost is not passed through the value chain, consumers are being duped by not being informed

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about how their choices in welfare standards translate to cost at point of sale.

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

- No  Yes Comments: ACGC representing contract chicken farmers agrees that provision of some certainty with respect to the standards justifies the costs of Option C, with the changes summarized in 2. and detailed in ADDITIONAL COMMENTS AND SUGGESTIONS below.

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 summarized in 2. 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: N/A

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: N/A

**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:  
Reducing the stocking density to 30kg/m<sup>2</sup> in Option E is not supported. ACGC believe there are no benefits to poultry welfare delivered by Option E, and furthermore the huge cost of its implementation, as documented in the RIS, would be devastating to the overall Australian industry, the overall Australian economy and to Australian consumers' ability to buy affordable chicken meat.  
Detailed analysis has been undertaken by ACMF (of which ACGC is a member), and we concur with their view that there is no evidence to suggest that decreasing stocking density to 30kg/m<sup>2</sup> has any positive impact on bird welfare. We also concur with their view that on-farm management of ventilation, temperature, humidity and litter

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quality, and good stockmanship, is the most effective means of achieving good welfare outcomes for the birds.

Whilst we support an evidence-based approach, we acknowledge that the stocking density recommendation comes down to a qualitative judgment. Therefore it is appropriate to use relevant scientific literature in conjunction with current practices and community expectations. Whilst there is no compelling scientific evidence to show an increase in bird welfare with a drop in density, ACGC are prepared to submit that the stocking density in the standards be reduced to 38birds/m<sup>2</sup> in the interests of gradually and cost effectively bringing stocking densities down to meet *perceived* community expectations for the industry.

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 be derived from reducing density to 30 kg/m<sup>2</sup>, whereas the very substantial costs of such a change have been clearly documented in the RIS. A reduction in stocking densities will lead to an increased demand for shedding which puts pressure on land use, planning schemes and significant costs to farmers in capital expenditure. A reduction in stocking densities of any magnitude will only be possible for industry to cope with if costs are passed onto the end consumers. We make special note that the market incentive to prioritise productivity is entirely in the hands of the processors not the farmer, who is however responsible for the welfare of the bird for the majority of its life. We support a manageable reduction in stocking density that addresses the economic costs and benefits as well as community perceptions of welfare.

**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: N/A

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: N/A

**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)**

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

No     Yes    Comments: N/A

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: N/A

#### **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, assuming the changes summarized in 2. and detailed in ADDITIONAL COMMENTS AND SUGGESTIONS at the end of this submission, are made.

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: ACGC support the work of ACMF in undertaking detailed analyses of the literature surrounding the effects (or lack thereof) in the areas of stocking density and light intensity.

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: As detailed earlier, contract farmers are bound by their contractual arrangements with processors. If processors are forced to introduce cost prohibitive stocking densities, they may shrink their operations to fewer areas of Australia, meaning the loss of livelihood for farmers. If costs of implementation are passed through to farmers, smaller farmers without the means to grow economies of scale will be forced out of business as they will be unable to maintain profitability. Upgrading of lighting may also be cost-prohibitive for smaller farms, and some older, smaller farms may not be able to comply with litter standards as currently written therefore we propose a change (detailed in ADDITIONAL COMMENTS AND SUGGESTIONS)

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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:

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## OTHER COMMENTS OR SUGGESTIONS

As an independent industry body specifically representing the views of Australian contract meat chicken farmers, ACGC reserve the right to put forward positions that represent the best interests of farmers. As the farmers of the birds, we are responsible for the welfare of the birds for the majority of their lives. We raise the birds according to our contracted terms with our processor and strive to create the best welfare outcomes possible within those parameters. We are supportive of the consultation process undertaken and in general we are broadly supportive of the views and analysis of ACMF. ACGC believes that Option C comes closest to achieving the best combination of welfare benefits and costs. However, without the changes detailed below, the costs of Option C do not justify the potential benefits. We submit that the current wording could lead to prosecution of farmers for uncontrollable situations, which have minimal, or no impact on bird welfare and which indeed in some cases could result in adverse bird welfare outcomes.

Without these changes our position is that the proposed standards and guidelines should become guidelines only (i.e. Option B), as the potential benefits do not outweigh 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 young poultry for the first 3 days after</i>	<ul style="list-style-type: none"> <li>Light intensity is not always evenly distributed across a shed. A single measurement of light intensity at any one point in a shed is unlikely to be representative of the light intensity in the shed overall or at all points in the shed. Standard SA6.3 already</li> </ul>	<ul style="list-style-type: none"> <li>The standard must clarify that the 20 lux is an 'average' i.e. "<i>A person in charge must ensure that the light intensity for young poultry for the first 3</i></li> </ul>

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	<p><i>hatching is at least 20 Lux</i></p>	<p>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"> <li>• 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 providing 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.</li> </ul>	<p><i>days after hatching is at least 20 lux, <u>on average</u></i>".</p> <ul style="list-style-type: none"> <li>• <b>There must be a “phase in” period of at least 5 years post S&amp;G sign-off</b> for this standard, to allow necessary facilities to be modified or replaced.</li> </ul>
<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,</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 ACGC believes that these standards should be amended to remove the conflict. A possible alternative wording is</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</i></p>

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	<i>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"</i>	provided at right.	<i>remains of its original intent: "A person in charge must ensure that lighting patterns must encourage activity"</i>
SA7.2	<i>A person in charge must ensure that mechanically ventilated sheds have;</i> <i>1) a back-up power supply that is tested weekly; and</i> <i>2) automatic alarm systems to warn immediately of ventilation failure; and</i> <i>3) have a system in place to respond and take action at the first reasonable opportunity</i>	<ul style="list-style-type: none"> <li>If ventilation system is managed 'manually' e.g. 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.</li> <li>"Mechanically ventilated" needs to be defined. It should be defined in the glossary with wording at right.</li> </ul>	<i>A person in charge must ensure that mechanically ventilated sheds have:</i> <i>1) a back-up power supply that is tested weekly; and</i> <i>2) a system in place to respond and take action at the first reasonable opportunity.</i> <i>Additionally, where airflow is solely reliant on mechanical ventilation, there must also be automatic alarm systems that warn immediately of ventilation failure.</i> <b><i>Mechanically ventilated – to be defined in the glossary as having any ventilation component that requires power for its operation.</i></b>
SA8.2	<i>Where litter is used, a person in charge must ensure the risk</i>	We oppose this standard as worded. Testing a significant sample of 100% of all litter (a) received and (b) once in the shed would be cost prohibitive We	<i>"Where litter is used, a person in charge must take reasonable measures to ensure the risk of</i>

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	<i>of contamination of litter with toxic agents is minimal.</i>	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”.	<i>contamination of litter with toxic agents is minimal”.</i>
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 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 (e.g. 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 (e.g. 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 <b>minimise</b> 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 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	<i>“A person must not pluck live poultry, <b>other than removal of small areas of feathers for the purposes of collection of diagnostic samples or for diagnostic testing</b>”.</i>

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		birds for this purpose.	
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. 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, <b>or return to a farm.</b></i>

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