



Submission on the Public Consultation for Animal Welfare Standards and Guidelines (S&G's) - Poultry Regulation Impact Statement (RIS)

February 2018

Turi Foods is Australia's third largest chicken meat producer.
We supply approximately 12% of Australia's chicken meat.
Turi Foods is a fully integrated poultry operation (excepting feed mills).
Turi Foods owns and operates 15 breeder farms, 2 hatcheries, 1 company owned broiler farm as well as 90 contract broiler farms, 2 primary processing plants and 1 further processing plant.

Turi Foods currently employs approximately 800 employees and a large number of contractors supplying services such as transportation, cleaning, live bird pick -up and boning .

Attached are our replies to the questions related to the Regulation Impact Statement for the proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry.

Should you require any further information regarding Turi Foods submission, please contact -

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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:

Most advantages / disadvantages are covered adequately in the list . However, Turi Foods challenges the concept that disease can spread faster in high density systems, such as cages.

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

No Yes Comments:

Poorer Bio security in Free Range systems increases the risk to the rest of the poultry industry , as evidenced by recent disease outbreaks .The RIS does not adequately consider the cost to other sectors of the poultry industry nor the impact cost on exports of poultry products.

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:

We can see the benefit in clarifying some of the guidelines with respect to animal welfare. Minimum light intensity and dark periods using Breed guidelines for species should be the guide .

We support stocking density guidelines that take in to account variability in facility capabilities.

Guidelines for bedding materials is important to help minimize contamination from toxic materials, however, these guidelines need to be realistic. To "guarantee" 100% absence of toxic material is not practical and cost prohibitive.

Guidelines on litter conditions for birds raised on the floor are important provided they take into account all animal welfare conditions.

Litter can be dry and caked in parts of the shed but still provide satisfactory conditions for birds, whereas, if the litter was to be worked it would release high

levels of ammonia and require feeders / drinkers to be removed from the birds for a period of time.

Birds awaiting slaughter at the processing plants can pose a significant welfare risk if satisfactory holding conditions are not provided.

This does need to be addressed in the standards.

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

Comments:

Litter management is important provided definite requirements that take into account all conditions for the best animal welfare outcomes are considered.

An example is disturbing the birds rotary hoeing during periods of peak density as opposed to waiting a day or two until after a thin out when there is more room.

Protection from adverse weather whilst awaiting slaughter is another area of great concern with regards to welfare.

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's are quite clear and understandable. Our company does not see any areas where MCOP's can create uncertainty.

Does such uncertainty vary between different states and territories?

Comments:

We do not believe there is uncertainty amongst Processors, but the uncertainty could occur with consumers who are ,perhaps, not as knowledgeable asy people.

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

Comments:

With respect to animal welfare, we do not believe productivity is impacted currently. However, standardized stocking densities is very important across all states. Because of the significant cost impact of density, variations between States will create some companies / operations becoming financially less competitive if a states requirements are more stringent than other states.

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:

Darwalla poultry - Poultry Integrator
ProTen - Contract Farms
RFM (Rural Funds Management) - Contract Farms

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:

The cost /time required to establish new farms varies significantly across different state. Whilst this is not relevant in regards to animal welfare, it does make some jurisdictions less productive.

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 essential to ensure processors are equally competitive.
Animal welfare guidelines can impose significant costs to producers and it is unfair if producers in one state are permitted to have lesser standards, therefore lower cost of production compared to other producers.
The consumer needs to have confidence that no matter where they purchase their poultry products, they were produced under the same animal welfare guidelines.

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:

The current MCOP works well and could easily be used as a voluntary guideline and included into the proposed new standards and guidelines.
Some proposals in the draft standards and guidelines would also improve welfare outcomes without imposing prohibitive costs on industry.

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

No Yes

Comments:

We believe Option C provides more certainty at a cost that is affordable to the industry compared to Option B.

However, Option B is far more realistic, both from an animal welfare outcome and financially than Option E.

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 don't believe that there is enough evidence to establish what the majority of Community expectations and values are in this area.

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

No Yes Comments:

Provided there are some changes implemented, we believe that the certainty Option C brings will justify the costs that will be incurred.

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

No Yes Comments:

We believe the existing requirements or voluntary guidelines (Option C) would be preferable.

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:

Extensive costs involved for little outlined benefit

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:

Evidence cannot be shown that 30kg/sq m achieves a significant benefit to animal welfare vs. 34 or 36 kg/sq m.

Recently published Victorian literature nor an Agrifutures review published in 2017 do not support the view that a limit of 30 kg / sq m would achieve any measurable favorable welfare outcome .

Studies have shown improvements to animal welfare when compared to stocking densities in excess of 40kg/sq m. The industry is not advocating these types of densities.

The impact cost , as pointed out in the RIS ,of moving from 40 kg /sq m to 30 kg/ sq m would be huge without proven evidence that welfare would be improved.

This option would significantly increase the cost of chicken for the average Australian household without any off-setting benefits.

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 explained above, Option E is in no way a suitable option in any combination.

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:

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:

Castration, pinioning and de-voicing are not practiced in the chicken meat industry and should be banned.

Second beak trim needs to be an allowable option in some systems when required but would need satisfactory restrictions in place to ensure it is not a routine practice.

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:

If there are some modifications , as detailed above, Option G would be preferable when combined with Option C.

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:

We believe, if additional comments, as provided by ACMF in their submission, are applied to Option C in combination with Option G then this would provide the greatest net benefit to the Australian community.

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:

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:
