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To Whom It May Concern;

Aviagen Australia is the largest supplier of meat chicken breeding stock to Australian poultry companies. Aviagen Australia is also an exporter of chicken breeding stock throughout Asia. To keep supplying the latest genetic material to Australian and overseas customers; Aviagen regularly imports hatching eggs through approved quarantine facilities and multiplies that stock for sales of subsequent generations. Aviagen Australia is part of a larger group, headquartered in the UK and USA, with operations around the world. Aviagen has an active internal animal welfare group and all operations are regularly internally and externally audited against local and international welfare standards.

Aviagen Australia broadly supports the proposed animal welfare as they are presented in the draft Australian Animal Welfare Standards and Guidelines for Poultry. In responding to the Regulatory Impact Statement (RIS) this would be Option C. Aviagen Australia believes the Standards proposed will ensure a high standard of welfare for Australian poultry flocks.

In addition, Aviagen Australia has major concerns with some of the alternate proposals categorised as 'Variations of Option C' in the RIS. Option D-although none of Aviagen's flocks are caged and the meat chicken industry generally does not cage its birds, there is a concern that the phasing out of cage farms will increase the proportion of large flocks of chickens kept outside and with it the likelihood of exotic disease, particularly avian influenza. The last two outbreaks of avian influenza in this country have been in free-ranging layer stock and led to the destruction of large numbers of birds and major disruptions to industry. A better option would be to insist that all flocks over a certain number be housed in biosecure facilities and then determine how the birds were managed within the shed for the best animal welfare outcome, be this cages or not.

Option E- Aviagen supports the proposed density standards as proposed in the draft Australian Animal Welfare Standards and Guidelines for Poultry. For our particular circumstance this means the 30 kilograms per square meter for breeders in a non-cage system. We note this is carried over from the current Model Code of Practice and is broadly in line with international standards. The '9 birds/m<sup>2</sup>' figure in this option cannot take into account differences between breeding lines.

Aviagen also questions the validity of the option to reduce meat chicken density to 30kg/m<sup>2</sup>. We are unaware of any literature that supports this particular density independent of the effects of type of housing or standard of management. The proposal ignores the significant improvements in the breeding, housing and management of meat chickens over the past two decades and if adopted would act to penalise producers that have invested in modern controlled environment housing. Given the correct environment, modern breeds of meat chickens will develop to their full genetic potential at the densities proposed in the draft Australian Animal Welfare Standards and Guidelines for Poultry, they do not exhibit of the signs of stress or overcrowding that inhibit their potential growth rate and efficiency. Any reduction in permitted density would inevitably lead to a new housing being of a much lower standard than has been the case, exposing birds to the extremes of temperature, humidity and air quality that were the norm in older style sheds.

Option G- please note that none of these practices are employed in the modern meat chicken industry.

In conclusion, Aviagen Australia believes that, with some minor clarifications and editing, Option C of the RIS, the draft Australian Animal Welfare Standards and Guidelines for Poultry (along with the proposals in Option G, if considered necessary) best meets the need to provide acceptable animal welfare standards for the chicken meat industry.

Kind Regards

A handwritten signature in blue ink that reads "Michael Leahy".



Michael Leahy

Managing Director

Aviagen Australia and New Zealand Ltd