



Australasian  
Turkey Federation

7 March 2018

Submission to Animal Welfare Standards Public Consultation  
Via email: [publicconspoultry@animalhealthaustralia.com.au](mailto:publicconspoultry@animalhealthaustralia.com.au)

Dear Sir/Madam

**CONSULTATION ON THE REGULATORY IMPACT STATEMENT AND DRAFT AUSTRALIAN ANIMAL WELFARE STANDARD AND GUIDELINES (S&Gs) FOR POULTRY**

The Australasian Turkey Federation (ATF) is the national body representing the commercial turkey meat industry. The industry is a substantial economic driver in some regions of NSW and SA in particular and is the third largest poultry industry after the chicken meat and the egg industry.

Our comments on the proposed draft S&Gs for poultry reflect the fact that:

- animal welfare S&Gs must be based on the best available science and must be formulated in an unambiguous manner; and
- Increased regulatory requirements create substantial costs which are only justified if there are clear and adequate animal welfare benefits to be expected from the requirements.

ATF is supportive of Option C, a legally enforceable set of standards consistently implemented nationally, provided certain changes detailed in this turkey-focused submission as well as the submission by the Australian Chicken Meat Federation covering broader concerns also affecting turkey farming are made.

The main areas of concern to the turkey industry with the S&Gs as currently drafted relate to the proposed overly restrictive maximum densities (SB13.5) that are not supported by conclusive scientific evidence and are inconsistent with internationally applied standards; as well as the proposed restrictions on toe trimming (SA9.11) which require modification to limit the negative animal welfare impact due to reduced management options being available.

We would also like to draw your attention to submissions separately submitted by two of our biggest members, i.e. Inghams Group Limited and Baiada Poultry Pty Ltd, which raise similar concerns.

Yours sincerely

Colin Quast  
Vice President

Encl. Australasian Turkey Federation Submission to public consultation process

Public Consultation for Australian Animal  
Welfare Standards and Guidelines - Poultry

Answers to RIS Questions

by

The Australasian Turkey Federation

## RIS PUBLIC CONSULTATION QUESTIONS

**Date:** 12 March 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: This submission is focused on the issues of specific relevance to the farming of turkeys and does not offer comments on matters nor relevant to turkey farming.

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

No  Yes Comments: The increased risk of disease to conventionally farmed birds from free-range operations is not included in the RIS. There are substantial risks and cost implications to the other poultry operations from free range operations.

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 agree that some changes are justified on welfare grounds and reflect changes in community attitudes and changes in technology. While we generally support the draft S&Gs, we do believe that a number of changes are needed to ensure that the S&Gs are fit for purpose. These specific changes are detailed under "additional comments" at the end of the submission.

We do not support the removal of routine hot blade trimming for breeder turkeys (as proposed as Option G) because we believe that it remains an important tool in the management of breeder flocks for good animal welfare outcomes. See "Other Comments or Suggestions" for details.

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

Comments: We support the establishment of maximum stocking densities but believe that the currently proposed densities for turkey broilers is not in line with international standards and is not supported by scientific evidence while strongly limiting the industry in its ability to optimally manage turkey flocks and make best use of the available infrastructure. See "Other Comments or Suggestions" for details.

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: To have a legally enforceable minimum standard would make it easier for consumers to have confidence and trust in the poultry industry in terms of its animal welfare outcomes. Such trust and confidence will ensure that the industry is allowed to operate with minimum interference.

Does such uncertainty vary between different states and territories?

Comments:

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

Comments: Any uncertainty or inconsistency will impact industry adversely and this is also true for animal welfare requirements.

#### **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:

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: Inconsistencies between states can influence national investment and growth strategies of industry participants and may lead to less than optimal outcomes.

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: Yes, consistency minimizes overall cost and optimizes the allocation of resources as indicted above.

**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: Yes, but we believe that legislated minimum requirements are a better option (Option C)

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

- No  Yes Comments:

**RIS location - 4.2.5 Option C: (the proposed national standards as drafted)**

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: ATF believes that once consumers' expectations regarding choice, availability and price of poultry products in addition to animal welfare are included in the assessment of consumers' expectations, then the proposed national standard under Option C is a reasonable reflection of community values and expectations. It is unreasonable to judge the animal welfare outcome completely separate from the issues of choice, availability and price of products.

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

- No  Yes Comments: Provided some adjustments are made (see "Additional Comments or Suggestions"), ATF agrees that the benefits in terms of animal welfare justify the costs anticipated.

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

- No  Yes Comments: Option C, with appropriate modifications (see "Additional Comments or Suggestions") is our preferred option.

**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: ATF does not represent the layer industry and thus is not making any comment on this option.

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: ATF does not represent the layer industry and thus is not making any comment on this option.

**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: This submission focuses on the turkey industry which is not affected by Option E relative to C.

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: This submission focuses on the turkey industry which is not affected by Option E relative to C.

**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: This submission focuses on the turkey industry and thus is not making any comment on this option.

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: This submission focuses on the turkey industry and thus is not making any comment on this option.

**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: ATF agrees that there are welfare benefits from banning castration, pinioning and devoicing and these are not practices that the commercial turkey industry employs.

However, we do not support the banning of routine hot blade beak trimming for turkey breeders because we believe that the economic and animal welfare costs outweigh the likely animal welfare benefits.

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, but not including the ban on hot blade beak trimming of turkey breeders.

**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 with appropriate adjustments as flagged above and detailed under "Other Comments or Suggestions".

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:

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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

The focus of this submission is on TURKEYS. ATF is aware of the submission prepared by the Australian Chicken Meat Federation dealing with the proposed standards and guidelines from the broader perspective of chicken meat as well as GENERAL POULTRY standards and guidelines. ATF supports the views expressed in the ACMF submission.

The areas of the draft standards and guidelines that in ATF's view must be modified to ensure that Option C is cost effective, is consistent and is clear in its meaning are as follows:

	<b>Wording in draft standard &amp; guidelines</b>	<b>Proposed wording</b>
<b>SA9.11</b>	A person must only perform toe trimming on day old hatchlings selected as potential breeders, except for emus and ostriches which may have toes trimmed on commercial stock up to 5 days of age.	<p>A person must only perform toe trimming on day old hatchlings selected as potential breeders, except:</p> <ul style="list-style-type: none"> <li>• for emus and ostriches which may have toes trimmed on commercial stock up to 5 days of age.</li> <li>• for turkey broilers where a person must assess the need for toenail trimming and undertake only when necessary for welfare, with the following conditions: <ul style="list-style-type: none"> <li>- A person must use infrared technique and appropriately calibrated equipment.</li> <li>- A person must aim not to remove more than the toenail up to and including the nail bed.</li> </ul> </li> </ul>
	<i>Why is this change requested?</i>	<i>Why is this change requested: Toe trimming is a measure that has on balance some animal welfare benefits when applied in a judicious manner and in a way that aims not to remove more than the toenail. The new wording attempts to capture this more restricted application of this technique so as to optimize the animal welfare outcome.</i>

SB13.3	A person must not lift or carry turkeys by the head, neck, wings, feathers or tail feathers unless otherwise supported by the breast. Except when lifted by the tail feathers and neck or by a leg and a wing or by the base of both wings for vaccination.	A person must not lift or carry turkeys by the head, neck, wings, feathers or tail feathers unless otherwise supported by the breast. Except when lifted: <ul style="list-style-type: none"> <li>• by the tail feathers and neck or</li> <li>• by a leg and a wing (incl. for artificial insemination) or</li> <li>• by the base of both wings for vaccination.</li> </ul>
	<i>Why is this change requested?</i>	<i>The current wording is unclear in that "for vaccination" could be read as applying to all three exceptions. Adding reference to artificial insemination covers this standard practice more explicitly.</i>
SB13.5	A person must ensure the maximum recommended stocking densities for turkeys are according to housing type and under good management conditions and as follows: Live weight Bird density in useable area 6 kgs 30 kg/m <sup>2</sup> 7-10 kgs 35 kg/m <sup>2</sup> 10-13 kgs 42 kg/m <sup>2</sup> 13+ kgs 46 kg/m <sup>2</sup>	A person must ensure the maximum recommended stocking densities for turkeys are according to housing type and under good management conditions and as follows: Live weight Bird density in useable area <13 kg 42 kg/m <sup>2</sup> 13 - 17kg 46kg/m <sup>2</sup> >17kg 50kg/m <sup>2</sup>
	<i>Why is this change requested?</i>	<i>There is only limited research available on the topic of density in turkey farming and its effect on animal welfare. We would consider the type of evidence reported in the Victorian Farmed Bird Welfare Science Review (Bristol Uni) as insufficient to support the restrictive minimum density scale proposed in the draft standard.</i>  <i>It seems reasonable to extrapolate from the broiler research and conclude that management factors may also be more important than stocking density alone on the welfare of turkeys.</i>  <i>Farm Animal Welfare Council (FAWC, 1995) has concluded that the growth characteristics of turkeys on a three dimensional basis requires special consideration when determining stocking density. They've recommended</i>

		<p><i>stocking densities should be scaled according to a two-thirds power of their live weight. On this basis, it was recommended that turkey broilers at terminal density can be stocked up to 59 kg/m<sup>2</sup> when grown up to 20 weeks of age (Webster, 2011).</i></p> <p><i>Commercial experience has demonstrated that turkeys in controlled environment housing can grow to breed specified weight targets, at densities well above the recommended 38 kg/m<sup>2</sup> in the United Kingdom (DEFRA, 1987), without compromising welfare (Webster, 2011). The taller stature of turkeys enables air flow underneath the bird and helps minimise issues with litter quality.</i></p>
<b>Option G</b>	We are opposed to the removal of routine hot blade beak trimming of breeder turkeys as a management option.	Option G, if adopted, must not ban routine hot blade beak trimming of breeder turkeys as a management option.
	<i>Why is this change requested?</i>	<i>We do not believe that the welfare benefits outweigh the costs both economic and in terms of animal welfare.</i>