

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: 26/02/2018

Name: Claire Dolling

Contact information:

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:

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

No Yes Comments:

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: In a conventional cage size is 550cm² per hen, this size prevents hens from performing basic natural behaviors. Studies have shown that hens require more space to flap wings, stretch wings, preen, and ground scratch, stand, turn around and lie down. Observations taken of the behaviour of birds in commercial conventional cages confirms that many behavioural activities are constrained. Rhim (2014) compared birds housed at 420, 660 and 940 cm²/bird (group size 5 in all treatments) and found that comfort movements such as preening, walking and stretching were increased at higher spatial allowances, whilst sleeping and inter-bird pecking were reduced.

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

Comments:

Conventional cages, stocking density for geese, partridges and pheasants, allocation for responsibility of welfare of poultry, ensuring that poultry that are not fit for slaughter are killed humanely.

These Poultry Welfare Standards Regulation Impact Statement public consultation questions were drafted by the independent RIS consultants and approved by the Office of Best Practice Regulation.

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:

Does such uncertainty vary between different states and territories?

Comments:

N/A

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

Comments:

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.

These Poultry Welfare Standards Regulation Impact Statement public consultation questions were drafted by the independent RIS consultants and approved by the Office of Best Practice Regulation.

Comments:

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: As seen repeatedly in the media, consumers are confused as to what substitutes free-range and feel that they can not rely on marketing from the egg industry. There is also increasing consensus that the government can't be relied on to regulate this industry (<https://theconversation.com/governments-cant-be-trusted-to-deliver-welfare-standards-for-chickens-90091>).

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:

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:

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

No Yes Comments:

These Poultry Welfare Standards Regulation Impact Statement public consultation questions were drafted by the independent RIS consultants and approved by the Office of Best Practice Regulation.

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

No Yes Comments:

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:

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:

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:

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?

These Poultry Welfare Standards Regulation Impact Statement public consultation questions were drafted by the independent RIS consultants and approved by the Office of Best Practice Regulation.

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:

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:

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:

**A combination of D,E,F and G.
Phase out caged systems**

Reduce maximum stocking densities in barns or sheds for non-cage layer hens to 9 birds per m2 and meat chickens 30kg/m2

Availability of nests, perches and litter for all chicken layers in cage and non-cage systems

These Poultry Welfare Standards Regulation Impact Statement public consultation questions were drafted by the independent RIS consultants and approved by the Office of Best Practice Regulation.

Ban castration, pinioning and devoicing, no hot blade beak trimming at hatcheries, no routine 2nd beak trim – unless exceptional circumstances (hot blade permitted in this circumstance).

Please refer to ‘Poultry consultation 2018’ document.

- 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:

OTHER COMMENTS OR SUGGESTIONS

Please include any comments or suggestions that you'd like to share.

These Poultry Welfare Standards Regulation Impact Statement public consultation questions were drafted by the independent RIS consultants and approved by the Office of Best Practice Regulation.