

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: 15.2.18

Name: Bill Williams – Poultry Veterinarian / National Operations Manager – Proten LTD (Australia's largest broiler grower – growing approximately 11% of Australia's broilers - 70 million birds per annum)

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: Bird to bird spread is limited in cages because there is less opportunity for bird to bird contact. The chicken is also not in direct contact with its faeces and this is an advantage in the control of salmonella and other diseases that spread via faecal – oral transmission.

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

No Yes Comments: The disadvantages of free range systems have been under-estimated financially. The risk of exotic and endemic disease is significantly higher in free range operations. The flow on impacts to the rest of the industry are under-stated.

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: Yes some standards are inadequate or unclear however the wording in the proposed standard needs changing. Minimum light intensity needs to refer to shed average as anything else requires a major unwarranted lift in overall light intensity. Periods of lower intensity may be appropriate to manage pecking and flightiness in flocks therefore some discretion is warranted. The description of dark hours required is confusing and needs rewording. The requirement to ensure the litter is free of contaminants is impractical and absolutes for dry friable litter are unnecessary for optimal welfare.

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

Comments:

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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: Generally OK. Some items could be worded better (as above)
There should not be differences between states – it just adds complexity and cost to the community.

Does such uncertainty vary between different states and territories?

Comments: As above

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

Comments: Proten operates in WA and NSW and so different standards add complexity when adopting national training and systems. We are likely to operate in other states in the future.

I cannot see the need for different standards between states.

DA applications for poultry farms is an obvious example of state differences, although not specifically related to this review. In our experience it has become very difficult to establish farms in Victoria.

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: There is a growing trend in the industry toward corporate growers – i.e companies that own and operate many farms under a common ownership and operating structure. This is logical and good for the industry in that this structure provides more support for individual farmers (in this case farm managers). These companies have scale and size to fund larger farming operations which become more necessary in this environment of ever increasing compliance costs. Proten is the largest corporate grower of this type in Australia and operate in two states at present (and likely to grow). RFM is another. A Tabbita NSW farming complex is also owned by growers who operate in multiple states.

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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: planning permission as referred to earlier.

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: Simplicity – if it doesn't need to be different then make it the same. Integrators operating across Australia will be encouraged to increase production in 'favourable' states and reduce production in 'unfavourable' states. This places enormous hardship on growers who lose growing contracts as a result. The produce will find its way into all markets anyway and so nothing is achieved by different states regulations apart from higher cost and uncertainty in the industry and in the public.

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 new standard draft has some enhanced aspects as discussed

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

No Yes Comments: B is better than E –but C is most preferred

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: That's a very difficult question. The NSW survey is a good example of how opinion can be misread. Consumers like the concept of chickens roaming in green pastures when viewed in isolation of the practicality and cost of achieving it.

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

- No Yes Comments: With appropriate amendment option C is justified. It provides clarity and some degree of simplicity by having one set of rules.

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

- No Yes Comments: as above

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: Doubtful welfare benefits at huge cost

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:
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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 is a flawed concept that will increase the cost of chicken to consumers. Look at the European situation where this has been done to death. Management, housing facilities and breeding will have a far greater impact on welfare than stocking density alone. Ensuring that facilities and management are appropriate for the stocking density selected is far more sensible. The current standard of 40kg / m2 is appropriate and means that integrators target 38kg / m2 anyway to allow for variability. RSPCA adopt 34kg/m2 as a point of difference. If a meaningless reduction in the national standard is made to 30kg/m2 – where will RSPCA want to operate? International Breeding companies have welfare as a high priority and have achieved great improvements over recent years – at commercial stocking density.

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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: High cost for very little (if any) welfare gain

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: not an issue in Australia anyway

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: But only in combination with Option C. Some flexibility for second beak trimming in the case of pecking etc would be required

RIS location - 4.3 preferred option

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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 changes suggested in this submission. Changes discussed for option G above with option C has merit.

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

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