



## Implementation of Australian Animal Welfare Standards for Poultry in Queensland. **October 2025**

**Prepared by**  
Jo Sheppard, CEO, QFF  
E: [qfarmers@qff.org.au](mailto:qfarmers@qff.org.au)

**Prepared for**  
Animal Welfare Program, Department of Primary Industries

## Contents page

About the Queensland Farmers' Federation.....	2
Submission .....	2
Overview .....	2
Identified implementation issues.....	3

This submission is provided to:

Animal Welfare Program, Department of Primary Industries  
Queensland Government

Submitted via email: [AnimalWelfareProgram@dpi.qld.gov.au](mailto:AnimalWelfareProgram@dpi.qld.gov.au)

### Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- Canegrowers
- Greenlife Industry QLD
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

# About the Queensland Farmers' Federation



**The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.**

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

## Submission

QFF welcomes the opportunity to provide this submission on Implementation of Australian Animal Welfare Standards for Poultry in Queensland. We provide this submission without prejudice to any additional submission from our members or individual farmers.

## Overview

Animal welfare is valued highly by QFF and its member organisations and is a foundation pillar for the poultry industry. Strong animal welfare practices enhance health, sustainability and production, reflects community standards, gives social licence for businesses and is critical for maintaining market access.

Queensland Farmers' Federation (QFF) welcomes the implementation of the poultry standards after more than a decade in its development. Stakeholder certainty is a critical element in planning for prosperous and profitable business investments.

There are some elements to the implementation that will have impact on the industry and QFF raises these as important matters that must be considered if we are to achieve a successful implementation. This is discussed in the response to the identified implementation issues in the discussion paper. Not all questions are responded to as the individual industries are best placed to respond to some questions asked.

## Identified implementation issues

### 1. Phase-out of conventional cage systems by 2036:

- **Timeline – the imperative for East Coast harmonisation:** While there is consensus amongst jurisdictions to implement the transition away from cages by 2036 (with the exception of Western Australia which is planning for 2032), it is imperative that all jurisdictions do implement at the same time. As the changes proposed will increase costs of production, any jurisdiction that delays their timeline will have an unfair market advantage which potentially could lead to:
  - **Closure of businesses** as they lose market share from cheaper eggs entering the Queensland market.
  - **Egg shortages and food security issues.** While the egg industry is now in oversupply due to expansion of the industry and the avian influenza shutdowns in Victoria now opening after 12 months, it is a tenuous situation particularly with the threat of diseases that can suddenly cut off supply.
  - **Animal and human health risks:** Moving to fully free-range production system undoubtedly causes increased biosecurity and health risks for birds. These risks can somewhat be mitigated but at significant management costs and even then, the risks do not entirely disappear. For example, pastures can be contaminated by wild bird droppings carrying avian influenza and other diseases. As HPAI H5N1 threats circle Australia, there is further the risk of avian influenza affecting human health and devastating wildlife. QFF strongly recommends that there is a need to investigate the potential impacts on food security, animal and human health should we continue to move towards a fully cage free system, rather than focusing on an integrated system that includes a range of production processes.
  - **Turkey densities in other states.** The chicken meat industry has identified some major issues with turkey densities in other jurisdictions. Until consensus on implementation can be reached, the chicken meat industry asks for delaying legislating the implementation for turkeys.

### Recommendation:

QFF asks for a full investigation on the potential impacts on food security, animal and human health should we continue to move to a fully cage free system rather than an integrated system that includes a range of production processes. Avian influenza is currently considered the number one animal disease threat to Australia, and the outbreaks in Australia in 2024 were in free range farms. QFF strongly recommends an integrated system that buffers the biosecurity and disease risk, protects food security recognising eggs as an important source of protein for families, and prioritises animal and human health.

QFF asks for a delay in legislating for turkey densities due to major issues in other jurisdictions. Consensus on implementation with other states and territories must be reached and committed to before being implemented.

For all other changes QFF asks for all jurisdictions to commit to a common implementation date for all aspects of the standards.

## **2. Perching requirements:**

QFF supports poultry industry positions on perches.

## **3. Ammonia monitoring requirements:**

There are significant inconsistencies on preferred levels of ammonia but there is agreement that ammonia levels should not exceed 25ppm. Egg Standards of Australia (industry certification program) require ammonia levels to not exceed 25ppm. European directives (Council Directive 2007/43/EC) stipulate that ammonia levels should be maintained below 20 ppm in poultry houses. RSPCA Approved Farming Standards for layer hens and meat chickens over 7 days of age should not exceed 15 ppm and meat chickens less than 7 days 10 ppm. Given the decision has been to make 15ppm the limit for poultry, QFF would support the proposal that the wording in SA7.4 should change the words “immediate corrective action” to “corrective action in a reasonable timeframe”.

### **Recommendation:**

QFF agrees that “immediate corrective action” be replaced with “corrective action in a reasonable time frame.

QFF recommends that levels of ammonia and their impacts be substantiated by good science data given the difference between Egg Standards of Australia, RSPCA and European directives. If this cannot be done, alternatively, an outcome-based regulation rather than a specific number would be more flexible to take into account different environments, breeds, and other variables.

## **4. Lighting requirements:**

QFF supports the industry position.

## **5. Stocking density of chicken meat breeders in non-cage situations:**

The chicken meat industry wants to ensure that when legislation is being drafted, that the definition of usable space definition is appropriate for the species, and



sufficient derogations incorporated into draft legislation so that unaffected (floor) species such as meat chicken breeders are excluded from this definition.

**Recommendation:**

QFF supports the meat chicken industry in recommending that definitions take into account species and exemptions applied so that unaffected (floor) species such as meat chicken breeders are excluded from this definition.

**6. Cost of implementing the new standards – request for compensation/structural adjustment:**

- The egg industry has estimated that conversion of caged bird accommodation to non-cage systems would require an extra 30% in land space requirements for birds and the chicken meat industry an 11% loss in production. Those who might decide or be forced to leave the industry altogether will not necessarily be allowed to change the usage of their land to more profitable pursuits such as residential real estate. This is because they are often in environmental green zones.
- Agricultural industries that have received structural adjustment packages include the Australian dairy, citrus, and pig meat industries, which experienced downturns due to market changes, policy reform, and increased import competition. Other examples can be found internationally, such as the Japanese beef industry following trade liberalization and the Canadian grain industry after reforms to the Western Grain Transportation system, according to [this OECD report](#).

**Recommendation:**

QFF recommends that an industry government group be tasked with determining an appropriate compensation and/or structural adjustment package for poultry establishments to convert to new regulatory requirements.

QFF appreciates the opportunity to provide this feedback and looks forward to continuing to work with government to ensure the implementation of Australian Animal Welfare Standards for Poultry in Queensland is effective in achieving the intent of the standards including supporting a strong, sustainable future for the industry, optimising animal health and safeguarding food security for all Australians.

Yours sincerely

Jo Sheppard  
Chief Executive Officer



**This submission is provided by the Queensland Farmers' Federation**

---

PO Box 12009 George Street, Brisbane Qld 4003  
Level 8, 183 North Quay, Brisbane Qld 4000  
ABN 44 055 764 488

**Contact QFF**

---

**E:** [qfarmers@qff.org.au](mailto:qfarmers@qff.org.au)  
**P:** 07 3837 4720  
**W:** [www.qff.org.au](http://www.qff.org.au)

