



# Analysis of the Impacts of the RSPCA's Introduction of Animal Welfare Standards for the Dairy Industry

## Executive Summary

The Royal Society for the Prevention of Cruelty to Animals (RSPCA) has approached Dairy Australia regarding the establishment of a set of Approved Dairy standards to be ratified by the RSPCA.

The introduction of a RSPCA Approved Dairy standard and Industry-owned program in Australia risks disrupting a sector that has already made substantial, industry-led progress in animal welfare, sustainability, and traceability. Across the country, dairy producers operate under rigorous regulatory oversight and have proactively adopted welfare-improving innovations. In South Australia, the SADA South Australian Dairy Industry Action Plan 2024–2029<sup>1</sup> and traceability program<sup>2</sup> further demonstrate the sector's commitment to continuous improvement, highlighting the capacity of producer-driven frameworks to deliver meaningful outcomes without the need for externally imposed standards that may not reflect operational realities.

## 1. Introduction

The RSPCA Approved standards program sets voluntary, higher standards for livestock welfare. RSPCA standards are based on animal welfare science RSPCA policy, best farming practices in Australia and overseas, and commercial realities. Designed to improve farm animal welfare through meeting the animals' physical and behavioural needs, requirements for housing, nutrition and a good quality of life. Each current standard includes around 343 unique criteria that Producers must meet in order to gain RSPCA Approved certification. Existing standards cover meat chickens, layer hens, turkeys, farmed Atlantic salmon, and dairy calves.

RSPCA Australia, the national body, does not have enforcement powers but plays a key role in influencing national animal welfare policy, legislation, and standards. In South Australia, the enforcement of animal welfare legislation is primarily undertaken by the RSPCA, a non-governmental organisation, rather than by state or territory police forces or authorities. In South Australia enforcement is carried out by RSPCA inspectors, who are granted legal authority through appointment by the relevant state minister. Nationally, the RSPCA operates as a federated organisation, with independent member societies in each state and territory.

The RSPCA's role and reputation amplify the influence of its voluntary standards. Introducing RSPCA-approved standards to the dairy industry could impose new, and potentially unrealistic animal welfare requirements, leading to financial, operational, and market pressures on dairy producers. This influence may also extend to processors and retailers, increasing compliance demands and potentially restricting farmers' access to markets and contracts. The following analysis explores these commercial, regulatory, and structural impacts in detail.

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<sup>1</sup> <https://sada.asn.au/industry-development/sa-dairy-action-plan>

<sup>2</sup> <https://sada.asn.au/industry-development/projects/national-agriculture-traceability-regulatory-technology-research-and-insights-grant>



## 2. Impacts on the Australian Dairy Industry

### 2.1 Reputational and Market Pressures

RSPCA-certified products often enjoy marketing advantages and brand loyalty. For non-certified producers, this creates reputational risk: they may be perceived as offering lower welfare standards, even if they meet all legal requirements. This dynamic already plays out in the Poultry industry, where non-cage-free products are increasingly stigmatised.

RSPCA campaigns actively encourage consumers to avoid non-certified goods. For instance, in its “Choose Wisely” initiative, the RSPCA states:

*“Whilst many Australian consumers choose to opt for cage-free eggs at the supermarket, many eggs supplied to food services still source eggs from battery cage hens. Discover, and support cafés and restaurants near you serving higher welfare food through the Choose Wisely initiative”<sup>3</sup>.*

This messaging goes beyond informing consumers, it frames uncertified producers as offering inferior or unethical products, even when they comply with legal standards. The implication is that any food product not RSPCA-certified is part of a lower-welfare system, fostering consumer distrust and driving public pressure on businesses to drop non-compliant suppliers.

This reputational impact could translate directly into lost contracts, diminished brand value, and long-term financial viability challenges for producers who cannot or choose not to pursue RSPCA certification.

### 2.2 Operational and Financial Costs

Complying with RSPCA standards often necessitates substantial infrastructure upgrades. These could include changes to farm designs, lower stocking densities, or alterations to housing systems, similar to requirements in the poultry and pig standards. For example, RSPCA-certified pork producers must not use farrowing crates<sup>4</sup>, a practice still common in the industry to prevent piglet crushing, despite its functional benefits. If similar provisions are introduced for dairy, farmers may need to abandon cost-effective systems in favour of standards driven by consumer sentiment rather than practical necessity. Additionally, labour demands will increase.

### 2.3 Compliance and Administrative Burden

RSPCA certification requires adherence to numerous criteria, with independent audits conducted by Specially trained RSPCA assessors twice annually, as seen in the Pigs standards<sup>5</sup>. This introduces new layers of record-keeping, training, and operational monitoring that may overwhelm smaller producers unaccustomed to regulatory frameworks. The risk of business disruption due to non-compliance or failed audits becomes a continuous concern. In South Australia, this could further complicate matters as the RSPCA's dual role as a welfare enforcement body under the act, creates confusion around what is voluntary and what amounts to legal requirements.

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<sup>3</sup> <https://www.rspcasa.org.au/the-real-deal-on-battery-cages/>

<sup>4</sup> <https://rspcaapproved.org.au/about-us/standards/>

<sup>5</sup> <https://rspcaapproved.org.au/about-us/standards/>



#### **2.4 Structural Change and Consolidation**

The cost and complexity of compliance may accelerate consolidation within the industry. Larger operations will have a competitive edge, widening the gap for smaller run farms.

#### **2.5 Export Market Positioning**

Certification may help some producers access higher-value supply chains and align with the expectations of ethically conscious importers. However, these potential benefits are not equally accessible to all. Small- to medium-sized farms may be unable to meet the stringent and often resource-intensive requirements, effectively excluding them from these premium markets. This creates a competitive disparity, favouring larger, well-capitalised operations that can absorb the costs of certification.

Furthermore, widespread adoption of the RSPCA standard risks sending a misleading signal to international markets: that farms not certified are operating at lower welfare levels. This perception—regardless of actual compliance with national laws—may deter international buyers from engaging with non-certified producers, fearing reputational backlash from their own consumers. The result is a subtle but powerful form of market coercion, where participation in a voluntary scheme becomes a de facto requirement to remain export viable.

#### **2.6 Regulatory Influence and Policy**

Although the standards are technically voluntary, their influence can bleed into formal regulation. Government bodies often adopt RSPCA-aligned language or policy positions when updating national welfare codes, which can, over time, shift the legal baseline. A clear example is the poultry industry, while battery cages are not currently illegal in Australia, the government has committed to phasing them out by 2036 through nationally endorsed animal welfare standards. These standards, although requiring individual state and territory implementation to become law, have already influenced major retailers such as Coles and Woolworths to pre-emptively move to cage-free supply chains. Such shifts demonstrate how voluntary frameworks—especially those backed by influential organisations like the RSPCA, can drive market and regulatory change that ultimately affects all producers, not just those who opt into certification schemes.

### **3 South Australia**

In South Australia, the RSPCA's official enforcement authority heightens the perceived necessity of compliance. Producers may worry that refusing to participate in the voluntary scheme could make them targets for increased inspections or enforcement actions. This blending of advocacy and enforcement roles undermines trust and creates policy confusion.

The sector is already demonstrating leadership in animal welfare and sustainability through industry driven initiatives. SADA is undertaking a traceability program that enhances supply chain transparencies and accountability, helping ensure high welfare and safety standards from the farm to the consumer. At the national level, tools like the Australian Dairy Carbon Calculator further illustrates the industries commitment to continuous improvement, enabling producers to measure their emissions and reduce their environmental impact.



These efforts highlight the sectors capacity to develop and implement credible, science-based frameworks, tailored to operational realities, without relying on externally imposed standards that may not reflect the complexity of modern dairy farming.

#### 4 Misalignment with Industry Realities

RSPCA often promotes standards based primarily on consumer expectations rather than scientific best practices or existing industry innovations. However, Australian dairy farms already have a strong track record in animal welfare and have implemented a range of initiatives aimed at improving outcomes for livestock.

- Widespread adoption of technologies such as robotic milking systems and real-time monitoring collars.
- Adherence to processor-driven animal welfare standards.
- Oversight from state-based food safety authorities, which include animal welfare in their auditing processes.
- Regular review of industry programs and policies to align with evolving animal welfare science.
- Implementation of national initiatives such as the DA Calfways program and the phasing out of induced calving.
- Active participation in the Dairy Sustainability Framework, highlighting a long-term, science-based approach to welfare and sustainability.

Despite these advancements, the RSPCA's portrayal of "higher welfare" risks misleading the public into believing that uncertified producers are unethical or outdated.

Statements like "ask your favourite brand why they're not RSPCA certified" create public pressure that disregards existing standards from organisations such as Dairy Australia, ADF, and ADPF. These standards are designed with input from veterinarians, scientists, and industry experts—not simply shaped by public relations or expectations.

#### 5 Lessons from current standards in place

Experience from other industries that have a RSPCA standard shows that the introduction of RSPCA standards can lead to unintended consequences:

- Market segmentation: Certified producers are favoured by retailers, while non-certified farms struggle to maintain contracts and rising costs as seen in Chicken meat producers.
- Constant evolution: RSPCA standards tend to expand over time, often being revised, adding new requirements that increase costs and operational complexity. Which risks the industry being bound, with science and industry knowledge sidelined in favour of public concern, standards may become more about image than meaningful welfare outcomes.

#### 6 SADA Recommendations

- **Not to engage with Third-Party Standard Imposition:** The dairy industry should resist the adoption of parallel standards imposed by non-governmental organisations, particularly where effective systems already exist. There is a risk that such schemes could evolve into the dominant model for animal welfare assurance, sidelining the industry's role in shaping ongoing standards and reducing the influence of farming expertise in future policy development.



- **Promote Industry-Led Certification:** Strengthen existing programs (e.g., Dairy Sustainability Framework) and enhance transparency to build public trust without ceding control to external bodies.

**Engage Constructively with RSPCA:** If the RSPCA proceeds with implementing a dairy standard, it should prioritise genuine collaboration with industry stakeholders over setting standards unilaterally. A partnership approach would help ensure that any recommendations are grounded in animal welfare science, practical farming realities, and operational feasibility. Creating a separate RSPCA-defined tier of welfare risks marginalising current best-practice producers and weakening the credibility of long-standing, evidence-based industry frameworks.

## Conclusion

The proposed introduction of RSPCA standards into the dairy sector presents both opportunities and significant challenges. While some provisions may support higher welfare outcomes, many are impractical for farm businesses to implement under real-world conditions. This risks placing unsustainable burdens on producers, particularly smaller operators. The voluntary nature of the standards may erode over time, becoming de facto expectations within the supply chain. Producers who cannot comply may be stigmatised or excluded from key markets, despite meeting existing legal and scientific welfare benchmarks. Public campaigns may further misrepresent non-certified farms as offering “lower welfare,” compounding reputational harm. In jurisdictions with strong RSPCA enforcement powers, such as South Australia, these pressures may be particularly acute, deepening structural inequality across the sector. To safeguard long-term sustainability, the dairy industry must take a proactive role in defending its science-based standards and ensure that future welfare developments are informed by practicality, transparency, and genuine collaboration.