

Annie's Free Range

ACN: 11 006 466 860

26 February 2018

Animal Welfare Standards Public Consultation

PO Box 5116

BRADDON ACT 2612

By email: publicconspoultry@animalhealthaustralia.com.au

Dear Sir/Madam

Re: Poultry Animal Welfare Standards Consultation

Thank you for the opportunity to comment on the draft poultry animal welfare standards and regulatory impact statement.

There are a number of documents on the website, each of which I have reviewed. It is clear that the draft animal welfare standards and guidelines will apply to all species of poultry and to all size of flocks. The majority of my comments will apply to the egg industry – especially to the commercial industry.

Our business consists of a free range egg flock whose eggs we collect, candle, grade, pack, market and deliver to small businesses such as restaurants, stores and supermarkets (eg IGA or Foodland). I am also involved in egg industry, and broader agricultural, policy.

In this capacity, I was one of the egg industry representatives on the Poultry SAG. I have over time also served on the Commonwealth National Consultative Committee for Animal Welfare, the Victorian Animal Welfare Advisory Council, chaired the Victorian Farmers Federation (VFF) Animal Welfare

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Committee, represented VFF on the National Farmers Federation Quarantine Committee (including animal welfare) and attended the Australian Animal Welfare Strategy.

In general, the draft Poultry Code is more detailed than the previous (4th) edition and has 50% more standards as well as detailed guidelines.

RSPCA and Animals Australia (AA) have said that they are not happy with the draft Code for a number of reasons including that 'Australia has not had a standards review at the start of the process'. This is not so. The Chicken Meat RIRDC had a review by Dr Jean-Loup Rault and the Australian Egg Corporation Ltd (now Australian Eggs), ran a number of fora for a broad range of stakeholders as well as have around 17 animal welfare reports on its website since 2003 (ie after the 4th edition was published). The research reports include:

- Best practice for on-farm euthanasia of spent layer hens (2015)
- The importance of rearing, environment, space and nests for laying hens in cages (2012)
- The importance of nests for the welfare of laying hens (2008)

The reports from the Welfare Fora are available from Australian Eggs. The meetings included: RSPCA, AA, Humane Association, Free Range Egg and Poultry Australia, Animal Welfare Centre, Commonwealth and State Government departments responsible for animal welfare and/or poultry, CSIRO, animal rights organisations, Chicken Meat RIRDC etc. The full list is in the reports.

Victoria's AgVic funded a literature search by Bristol University for all poultry species listed in the draft Code. Unfortunately, it states in the report that only 6% of the reports specifically relate to Australia. Some of these reports do not take into account that some issues such as perching and dust bathing vary by bird – especially by their early training.

RSPCA also states that 'battery' cages are prohibited in EU. This is implemented in northern Europe but not Southern Europe. They also state that cages are being phased out in New Zealand in favour of furnished cages. This may yet not happen as the NZ government appears to have reneged on its agreement to fund such a change.

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Conventional cages enable eggs to be sold at the lowest price without forcing farmers into bankruptcy. The large retailers have made various statements about not selling cage eggs but are yet to do so. Even if they do stop selling cage eggs, they are together around 48% of egg sales. The rest of eggs are sold in small shops, small supermarkets, restaurants, food service etc. These parts of the market predominantly sell cage eggs, followed by free range eggs and very few barn (non-cage) eggs.

Lastly, RSPCA is not happy with quality assurance/proprietary/market processes. However, it runs a proprietary program itself which is paid for by those being inspected or their processors.

The Draft Code consists of Standards and Guidelines. The Regulatory Impact Statement (RIS) applies only to the Standards as it is proposed that they will be mandatory in State and Territory legislation. The Guidelines will be voluntary and therefore will not be a cost.

Some Standards are difficult to interpret, and therefore, value. Standards 1.1 and 1.2 are very broad and therefore difficult to cost. In fact, we would like to see these standards removed.

There has been a lot of media and discussion regarding the amount of space for birds in cages. I have looked at a lot of birds in cages over the last 20, or so, years. Most birds look comfortable in the space they currently have as they share the space of other birds. The greatest advantage of cages is that it is easy to pick out which birds are aggressive and remove them from the cage. This is harder to do in floor systems and requires more training to be able to pick out the bird(s) and remove them.

The space in sheds for floor birds at 30kg/sqm is fine. Once again, the birds share the space of other birds. Free Range birds weigh around 2.2-2.4kg each, which means 12-13 birds per sqm. Barn birds usually weigh less at 2.0 to 2.1kg. This equates to 14-15 birds/sqm.

Reducing this density down to 9 birds/sqm equates to 20kg/sqm in free range and 18kg/sqm in barn. This would not be viable for free range egg farmers (which is one of the criterion for the RIS). In practice it would require either a 30% decrease in the number of birds farmed or a commensurate increase in

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shedding and all equipment. It would be the largest farmers who could most afford this. Small farmers would be particularly disadvantaged.

The data in the RIS re costings for the egg industry look reasonable for the commercial industry. The costs for small farms would be increased by around 30% due to cost of money, the need for new land in the current area (where the current market is), and allied costs. Small holdings, lifestyle farmers and backyarders have a higher range of costs again. Although there are around 300 commercial egg farmers, there are many more in the other egg categories listed in this paragraph. I can give you data around this if you would like to see it.

Our preferred option from those listed in the RIS, is Option B.

However, we accept that this is unlikely to happen so our next preferred option is Option C without any of Options D, E, F or G. This is because Option C gives the minimum cost to the industry or the consumer or government for the greatest change, as 50% of standards are new when compared with the current Code of Practice.

Option D disadvantages the consumer – especially those who are less well off – without giving a commensurate advantage to the birds (who are at that position now) and greatly disadvantaging the farmer. Option F is a variation on Option D as it is trying to increase costs to farmers.

Option E has been addressed above and Option G in regard to the use of the hot blade, disadvantages small hatcheries.

Therefore, we recommend Option C, if Option B is not available.

Yours sincerely



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Director

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