

RIS PUBLIC CONSULTATION QUESTIONS

Date: 19 February 2018

Name: Cheralyn Simpson

Dear Animal Health Australia,

My happiest memories of my childhood are living on a caged commercial egg farm. This farm was definitely not a state of the art facility but I do remember all hens being cared for and living in healthy, happy conditions.

After deregulation my parents, along with many other commercial egg producers invested in AAA eggs. AAA eggs continued to build cage, free range and barn laying farms. These facilities are considered cutting edge.

My parents have always been members of the Commercial Egg Producers Association, my Dad being president for over 13 years. My Mum is currently a committee member. No longer living on a commercial egg farm, I have kept up to date with farming practices.

Due to my background I have an interest in egg production systems and would like to submit my thoughts on the RIS Consultation questions.

1. Do you agree with the summary list of advantages and disadvantages of layer hen farming systems in Part 2.3.1?

Yes

In terms of animal welfare and egg production, it is clear caged production is far superior to alternative farming methods.

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

Yes

In a caged farm system, minimal human contact when collecting eggs (conveyer belts) ensures the protective layer of the egg "egg bloom" remains intact. The egg bloom prevents bacteria from passing through the shell pores and reduces loss of moisture, allowing the egg to last longer.

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

A disadvantage discussed in the caged system is "lack of freedom in cages for layer hens to express innate behaviours". These "natural" behaviours are subject to what they encounter in their environment. The original chicken lived wild in the jungle. They perched in trees at night to protect themselves against predators. In today's farming practices, predators are not an issue for hens in caged facilities, therefore this behaviour could be considered obsolete. Original chickens scratched and foraged to find food, this is conveniently provided for them in current facilities.

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

Biosecurity would be my greatest concern, in particular the infection and spread of avian influenza. Caged systems provide the greatest defence against the deadly disease.

Cannibalism of chickens and their natural pecking order is a great concern to their welfare. When living on our caged commercial farm, it was easy to identify a chicken that was subject to severe pecking. This chicken would be moved into another cage to protect against further pecking. Imagine being a hen in a free range facility, sharing the space with 50,000 other hens. I'd hate to be that hen at the bottom of the pecking order.

8. Do you think there needs to be national consistency in animal welfare standards for poultry? Please provide reasons for your answer.

Yes

Many companies, such as AAA eggs own farms across Australia. In order for them to maximise their effectiveness in Animal welfare it is important to have consistency throughout all facilities. By having the same standards, farms will generally have similar production costs in turn stabilising the market value of eggs.

9. Do you think that the net benefits to poultry welfare likely to achieved under Option B, are justified?

No

Without enforcement this option would not be effective.

10. Do you think that the proposed national standards under Option C reflect community values and expectations regarding the acceptable treatment of poultry?

No

Propaganda from animal liberation groups have been shared thought-out the community depicting a damaging biased view of Australian caged farms. The majority of the population have not visited a caged facility. Their decision to support the phase out of caged eggs is based on very detrimental images, words and anthropomorphism. These images and words are NOT reflective of current Australian farms.

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

Benefits of caged systems far outweigh all other commercial egg farming methods.

I think it is very important to have more than one kind of egg production method. If one system were under duress the alternate system would continue to supply eggs for consumers. This alleviates the need to import eggs into Australia. Free range farms are generally located on flood

plains. Flooding could affect production in free range operations. Caged egg facilities are significantly more resilient to the contagion, Avian Influenza.

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?

Option D is not cost effective for any commercial egg farmer with a caged facility.

Costs for the consumer will be considerably more under option D. Free range facilities require more land and cannot be located in warm environments. Transportation costs to supply eggs to these environments will be significantly higher. Caged facilities are climate controlled and can be situated anywhere in Australia reducing costs of transport.

Alternative systems to caged facilities are more labour intensive resulting in higher production costs.

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

I am not familiar with stocking densities for non-cage layer systems.

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

No

As previously explained in question 2, certain behaviours by chickens are not relevant in caged farms. Behaviours such as nesting appear to be learnt. Farmers have to encourage chickens to use nesting boxes in free range systems to enable easier collection of eggs.

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

Totally unacceptable to any egg producers with existing caged systems

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

When I was living on our commercial egg farm hens had been beak trimmed before arriving at our farm. We never experienced any problems with this. As they are carnivores and have a pecking order I think it is a very important practice for their welfare.

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?

Option C

Options A and B won't be effective. Options D, E, F and G have been created to indulge animal activists without scientific 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?

It is evident that caged farming systems biosecurity is far superior to that of any other system. Caged systems have significantly reduced the threat of avian influenza. If cages were to be phased out, there would be a consumer demand for more free range farms. This increases the risk of avian influenza. Humans can contract the deadly disease and there have been cases of avian influenza being spread human to human. Human welfare is just as important as poultry and this threat should not be ignored.

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?

All caged operating farms will be severely impacted if option D comes into effect. I would expect most small commercial caged farms to go out of business. This will have a devastating effect on their families, employees and of course the flow on to contractors.

Without financial assistance from the government, options other than A will financially impact farmers negatively.

Other comments or suggestions

I am in favour of adopting Option C.

In a caged egg farm every hen can be monitored closely. Food and water can be measured alerting staff if there is a change. These changes could indicate stress or disease and be dealt with promptly.

As I stated in my introduction, I was raised on a commercial caged egg farm. The ignorance towards caged egg production of many animal liberationists and consumers never ceases to amaze me. Hens do not lay eggs unless they are stress free and healthy. It is in the farmers' best interest to care for the welfare of their animals.

Thank you for reading my comments.