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## Proposed Australian Animal Welfare Standards and Guidelines (Poultry)

Submission to the Regulatory Impact Statement

## **The Commercial Egg Producers Association of Western Australia (CEPA)**

CEPA is the leading representative body for West Australian commercial egg producers. CEPA members produce approximately 75 per cent of eggs in Western Australia using caged, barn and free range production methods. The objectives of the Association are:

- To proactively represent and promote the best interests of Commercial Egg Producers in dealings with Government, non-government bodies and their representatives
- To secure uniformity of action on matters affecting the common interest of Commercial Egg Producers
- To promote and uphold industry codes of practice for animal welfare, quality assurance, bio-security, environmental, labelling and transport of live poultry
- To promote the consumption of Western Australian laid eggs

### **Public Consultation- The discussion in WA**

In WA, farmers support Option C of the RIS and welcome the opportunity for animal welfare to be consistent and mandated. CEPA believes this consistency will provide industry with more clarity as to their obligations to animals and consumers and will ensure farmers are legally accountable for their hen welfare.

It cannot be emphasized enough that animal welfare is the main priority for farmers. Correct and good farming allows for high production and low mortality, with each of the production systems there are advantages and disadvantages present.

Throughout the public consultation animal welfare groups and the WA Government have indicated support to phase out caged eggs (Option D). There are currently 950,000 hens spread among 15 caged farms in WA, with the largest having more than 500,000 birds and smaller producers housing between 2-5 thousand. Caged production continues to play an integral part of egg production in WA, there has been substantial investment in Free-Range farms, the process of moving from a caged farm to barn or free-range is impractical for farms throughout WA ranging from smaller to large WA caged producers.

CEPA strongly believes that expected market forces should be the indicator of supply and demand relative to caged eggs. We acknowledge there has been a decline in caged production over recent years, though industry continues to pride itself on being able to provide affordable, healthy and cheap protein for WA families.

### **Egg Farming in WA**

West Australians eat 1.5 million eggs every day, 53 per cent of eggs produced are caged, 42 per cent are Free Range and 5 per cent are barn laid. The total retail value of egg production in WA is \$150 million per year.

### **2.3.1- Risks to Animal Welfare**

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

CEPA recognises the importance of animal welfare and our farmers value the health and productivity of their hens.

As outlined in the RIS, each production system has its own advantages and disadvantages. Proper farming methods and the welfare of the birds is the upmost priority for all WA farmers in whichever production system they are farming. Low mortality and high production is a key outcome for all farmers, and each production has its own trade-offs with regards to animal welfare. The RIS report has failed to identify cage production advantages such as the production system having the lowest carbon foot-print, and most importantly the lowest mortality rate.

*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?*

CEPA recognises that consumers are inherently more concerned with regard to where their food comes from and how their food is produced. Option C of the RIS brings into effect mandating laws surrounding animal welfare. WA producers agree with the importance of being responsible and All systems provide their own challenges and producers are continually looking at science and new methods to better improve hen welfare.

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

The areas of greatest concern are related to factors that impede hen welfare, noticeably more so in Barn and free-range such as smothering, disease, feather pecking, cannibalism and predators (foxes).

### **2.4.1 Lack of clarity in standards**

*To what extent does the existing Model Codes of Practice (MCOPs) and related regulations create uncertainty for Industry?*

CEPA appreciates that the existing Model Code of Practice (MCoP) has become an outdated model. Consumer expectations are changing in a way that those purchasing eggs would like to have certainty that animal welfare is consistent and upheld nationally by Farmers. CEPA understands that previous language used in the MCoP such as 'must' requirements and 'should' statements provided difficulties in the implementation and enforcement of guidelines. Under the old model accountability of farmers or those responsible for animal welfare was difficult to prosecute.

CEPA supports Option C of the RIS, moving from voluntary guidelines to a mandatory and outcomes based approach will ensure community expectations that animal welfare outcomes are met in the practice of poultry farming.

The regulations of animal welfare in the MCoP is still a sufficient model for proper hen welfare outcomes, providing a strong platform to improve standards and guidelines.

*Does such uncertainty vary between different states and territories?*

CEPA does not believe this has created uncertainty for various states, as each farmer should have been aware of their own codes of practice.

#### **2.4.2 Excess regulatory burden**

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

Yes, there needs to be national consistency of animal welfare standards and guidelines, if some states were to implement different state policies to others, farmers are put at a risk of being less competitive and will be put at a disadvantage to other producers.

#### **4.2.4 Options for proposed standards**

##### **Option A**

As noted in the RIS, Option A requires no change, CEPA acknowledges that change is required as a necessary step forward.

Option A does not provide a sufficient net community benefit

##### **Option B (non-regulatory option – voluntary national guidelines)**

CEPA would like to see developments in the implementation of animal welfare ‘must’ and ‘should’ statements are no longer practical in ensuring all farmers maintain proper animal welfare.

Option B does not provide a sufficient net community benefit

##### **Option C (the proposed national standards as drafted)**

CEPA supports Option C; the draft standards being mandatory will for the first time provide a consistent approach to ensuring animal welfare outcomes are met.

This is important as it provides clarity for farmers and consumers as to obligations that farmers must meet. This will ensure good and proper husbandry of farmers and legal accountability to those who are not practising at the set standards.

Along with CEPA this reform is supported nationally by all farmers.

Option C will be a cost for WA farmers, it requires improved animal welfare outcomes for the 1.9 million hens in WA, although costs are outweighed by improved animal welfare outcomes.

Option C does provide a sufficient net community benefit

**Option D (vary the proposed standards [Option C] to include phasing out conventional cages for layer hens)**

In WA, there are 950,000 hens currently housed in cages, with nearly \$50 million invested in conventional cages over the last 12 years in WA. Option D will have a significant impact on WA industry.

53 per cent of eggs consumed in WA are caged eggs, this demonstrates there is still a market in WA for caged eggs. CEPA would like any reform to be based on market demand and a Government induced obligatory exit from caged eggs will impede on consumers rights to choose which eggs they would like to buy. A financial burden will be placed on WA farmers if compensation is not forthcoming to meet infrastructure costs.

Option D does not provide a sufficient net community benefit

**Option E (vary the proposed standards [Option C] to reduce maximum stocking densities in barns or sheds for layer hens and meat chickens)**

CEPA believes that science on the issue of stocking density appears to be contested and reducing stocking density would have a significant impact on WA producers in both production and loss of potential earnings.

Option E does not provide a sufficient net community benefit

**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)**

Future investment in infrastructure where there is market uncertainty cannot be justified, the costs of upgrading simply cannot be afforded.

CEPA is not opposed to furnished cages, however we believe a mandatory process would close farms or put farmers in a weak economic situation.

Option F does not provide a sufficient net community benefit

**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)**

Egg Farmers are not involved in castration, pinioning or devoicing.

CEPA is happy to work on a plan alongside national peak body Egg Farmers of Australia to see hot blade treatment at hatcheries phased-out over time, whilst consulting small hatchery operators who still undertake this practice.

### **Other Comments**

Option C of the RIS is nationally supported by the egg industry. A nationally mandated welfare standard will ensure industry regulations are followed by all egg producers. We will see the same obligations by producers with a few thousand birds, to producers who have a few million.

Option C is a sustainable and realistic approach to making necessary changes in the egg industry.