

Jo-Anne Bloomfield

17 February 2018

Dear Animal Health

Australia

**RE: Publics opinion on free range eggs only being available for sale**

I wish to lodge a letter of support for producers who supply Australian consumers with caged eggs. I strongly urge Animal Health Australia to not implement a outright banning of caged egg production sales in Australia.

My local shopping centre is Alice Springs, and I purchase caged eggs on a regular basis for my family. I have observed that usually most caged egg cartons are sold out or are certainly decreased stacked volume that were on the shelves as sale stock, compared to those varieties offered by 'cage free, barn or free-range varieties'.

Until recently I lived in Katherine, there is only one major supermarket there. That is Woolworths. In fact across all Australian food retail outlets I once heard that this facility had the largest turnover in all of Australia, even against the capital cities. The closest large retail outlets to Katherine would be Darwin (300 km to the North) or Tennant creek and Alice Springs.

Particularly in Katherine, Often you couldn't even buy caged eggs because they were all sold out. Only the very expensive free-range ones were available

Significant factors that affect my purchase are

1. Perceived benefits of free range egg production styles do not exist in the volume or consistency as the adverts would like us to believe.
2. Cost, Caged eggs are consistently half or even less the cost of free range eggs. Usually in the \$3.50 per dozen for good sized caged eggs.
3. I will not support any business that has a logo of RSPCA Australia on it. I believe RSPCA are an anti-farmer organisation that regularly

makes unfair and inaccurate allegations against farmers and stock producers.

I have spoken with a number of people who I socialise with and they were involved with caged egg production. It is my understanding that significance positive animal welfare and improvement in mortality rates are a perceived benefit of banning of caged production.

The mortality of free range hens is far greater due to exposure, pecking order distress and predators than it is with caged hens. I read one article, where the order of the mortality of caged birds was generally 3-5%, in open range animals it was consistently over 10%. Medication was of a very high use in the non-cage animal as was increased difficulty in observation for health issues of individuals. I have been unable to re-find this article for your reading.

I have also read other articles where the breeding of hens now is actually more suited to confined spaces than of those animals that are bred for outdoor purposes. I have no idea if this is true but to assume any species can be let roam as per common ancestral activities of that species and be adaptable and thrive to current conditions certainly needs to be considered.

I believe it is important to pursue and improve if needed, caged bird conditions, in regards to density and size. I have not read up on these issues in any great detail as I found it simply too difficult to find factual information on cage conditions and free range standards are too open to interpretation. I do not think outright banning of cages is conjunctive to better animal welfare or affordable egg production. I do not trust particularly information sources especially if they are animal liberation groups or rights based.

I also believe that the cleanliness and hygiene of very large-scale production eggs cannot be assured in non-cage environments. Ironically the very reason the caged industry was developed was to ensure strong hygiene and health practices. A process many small-scale producers can not ensure. This is simply a fact of scale of production and economies of operation for any industry.

I believe that promotion of free range eggs as better animal welfare in general is actually misleading and labelling is often incorrect, as per this article where ACCC have attempted to enforce some degree of definitions.

<https://www.sbs.com.au/food/article/2016/04/04/free-range-egg-labelling-scrambles-message-consumers>

As a cattle producer the biggest impact on animal welfare is actually the knowledge and skill of the animal handlers, Us. I suspect that any poultry

housing system greatest animal welfare impact is actually the human impact, there can never be enough research, training and skill development to assist better welfare of all animals. Human impact needs to be kept in mind the despicable action of Animal rights activists who trespass and purposely impose on particularly intensive animal productions such as hens and pigs. In some cases these criminals have caused serious bio-security risk and extreme stress to animals with their self imposed invasions. Ironically these people claim to want to improve animal welfare with their actions, yet most cause significant deaths through the fact they enter facilities at night.

If animal welfare groups were genuinely serious about animal welfare they would have supported the recent Bill 2015. Criminal code Amendment (Animal Protection) presented by Chris Back to ensure some legal protection by facilities trespassed and victimised by animal liberation personal.

I believe there is a place for all types of egg production due to the fact that each type has varied degrees on impact on welfare and no one system is 100% assured of positive animal welfare outcomes.

Cost. If phasing out of caged production in Australia is pursued, the poultry industry is already quoting an increased cost of \$700M, with production of eggs at approximately 16M per annum. I find this mind boggling expensive and can only assume that over even a 10-year period that egg costs will be incredibly high for the consumer. I estimate egg costs will double what is paid now at retail level!

It needs to be remembered that the humble egg is one of the most nutritious, simple, versatile and affordable proteins available to all consumers! It must remain as cost effective as possible. To make the cost of eggs not affordable is beyond comprehension!

I think it also needs to be remembered that the Northern Territory has a very high proportion of Indigenous people whose staple food is meat, bread and eggs. There is a myriad of issues in regards to health and well-being in the Aboriginal community but I observe regularly Aboriginal people who are obviously living rough still buying these basic necessities. As far as I know the NT has no large egg production facilities.

RSPCA. I do not support RSPCA. I believe they have been infiltrated by animal liberation leaders and their policies fail to recognise let alone understand the difference between a domestic animal and production animal.

Fundamentally RSPCA polls are flawed. Any information or so-called opinions they advertise as having received from them are so disproportionate to real consumers it is miss-leading and in my opinion negligent of real information.

RSPCA polls are based on a coverage of only 1,000 people. To say these polls, represent all Australians across our 27M population is absolutely ludicrous. It also beggars belief when taking into account where these polls were conducted and how. For instance, a poll take in the suburbs of Sydney is hardly representative of anywhere in the NT.

Most people when asked directly face to face, will not instigate an argument or invite criticism when cold called or met on the street to conduct a poll. Yet when actually shopping and considering real money budget impact I believe many buy caged eggs as a matter of economics. I have also read another article where the consumers were asked why they purchased non-caged eggs and it was their belief the taste of the egg was better than caged, animal welfare was of lesser concern to the consumers interviewed.

As far as I know no large-scale poultry systems exist in the NT at all therefore all our produce has to travel a minimum of over 2,000 kilometres just to get to our shops.

I also have concerns in regards to stopping the availability of caged egg sales on the general cost/production of our egg and poultry industry overall. It is with real concern that regulations would be considered that in the future could drive production values so excessively high in our own country as to enable an unfair advantage to imported products.

If the costs of production of cage free eggs is unsustainable in Australia then it can only be assumed that imported cheap varieties will find their way to the Australian consumer. This opens up another perspective of the fact that many of these imports would not have our stringent animal health requirements let alone disease prevention or protocol to protect human health. It is fact that the current Free trade agreements in some respects allow the import of inferior products that is undermining our current producers, specifically here I am talking about pork.

It needs to be very clearly understood that once the demise of a component of industry has occurred it is often not affordable or even able to be rebuilt or re-established. If Australian egg producers are negatively impacted by excessive cost regulation, should they close there is no assurance that they can be re-

opened. The impact is not only loss of eggs for sale to the general population but the ripple impact of jobs and economy.

I implore the animal welfare committee to not fall for the smoke and mirrors of Animal welfare groups such as RSPCA that give no consideration to these ripple on effects of closure of an industry across the wider community.

In summary I do not support a banning of caged eggs in Australia and believe the consumer should always be given the opportunity to purchase eggs that they want and can afford. I do not feel that the current 'non-cage' eggs are not affordable to many people and to say that they will be in the future if caged is banned is simply wrong.

I do support clearer guidelines and communication to consumers as to what constitutes a 'caged egg' or free range production system. I do support animal welfare guidelines across all types of poultry production.

I support Australian producers and applaud efforts to improve and increase animal welfare but it also must be to allow for a long term sustainable and viable production for the end product, the good old egg that can be afforded by the everyday consumer.

I thank you for allowing me to make this submission and thank you for taking the time to consider it.

Yours Sincerely

Jo-Anne Bloomfield.