

SUBMISSION

Animal Welfare Standards and Guidelines for Poultry 2018

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Introduction

Thank you for the opportunity to contribute to the development of the proposed poultry standards.

I come from a farming background, and I make my submission as an individual; I do not represent any organisation.

I prefer to write my own submission and not to answer the RIS questions. The reason is that I want to make it clear that I totally reject cage systems and other cruel practices (which I deal with below) rather than use the rigid framework of the RIS questions.

I totally support the views on these standards that have been put forward by Animals Australia.

My family and I were very dismayed that the proposed standards support the continuation of battery cages and do not propose a phase-out date for battery cages as soon as possible.

The comments I make in relation to the standards relate to all farmed birds – B1 to B13.

A. Issues to be raised before commenting on standards

Before commenting on the standards themselves, I have a number of issues to mention.

You ask: How well will the draft animal welfare standards and guidelines ensure the welfare of poultry and other farmed birds? My answer is - not at all.

The controversy surrounding the process used in setting these standards has been very concerning. The federal government MUST act on the report of the Productivity Commission (No. 79, 15 November 2016) to establish an independent national body to set standards for animal welfare. (See below for more discussion on the commission's findings.)

First I quote from media articles about the preparation of the draft standards to date. I do so because, as a member of the public, I lack confidence in the formulation of the standards.

B. Public consultation – do the public even know they have a voice?

Like an increasing number of Australians, I am very interested in animal welfare, because I want to ensure that farm animals are free from cruel practices at every stage of their lives. Page 26 of the RIS says there will be 'extensive consultation'. That is not true. Australians know nothing about the consultation process, other than the widespread media revelations about the corruption of the process, to which I refer below.

In response to the ABC TV 7.30 report on 21 December 2017, an AAP Medianet Online Press release of 22 December, 2017 attributes John Dunn, CEO of Egg Farmers of Australia, as saying 'We want to hear the views of all Australians on how we farm ...'

I find that statement hard to believe. The only way I, as a member of the public, knew that I could make a submission was when I saw an advertisement in the *Australian* newspaper in December 2017, paid for by Animals Australia, a not-for-profit animal welfare organisation.

I do read the *Age* and *The Australian* every day and sometimes the '*Herald Sun*', and I keep abreast of news and current affairs on TV and the internet. How can this process claim to be consulting widely with the public when most people are not even aware they have an opportunity to make a submission? It was not prominently advertised in the national press or in other media. I understand the 'national' consultation was advertised only in two rural newspapers in two states!

Moreover, the consultation period takes place over the Christmas/January period when many people who might have wanted to submit are occupied with festivities and school holidays. To their credit, not-for-profit animal welfare organisations have endeavoured to raise public awareness on social media and to assist people who want to make their voices heard. But this is virtually dismissed by the RIS directive that 'form' letters will be considered 'a collective submission'. Many in the community are not familiar with making their own submissions to government entities. 'Form' letters allow people to have their say. In all fairness everyone who has made an effort to make any sort of submission, including a 'form' letter, should have their voices counted as an individual.

C. Controversy about this standard-setting process

I now refer to a sample of media reports that have caused me concern.

First there was the ABC TV 7.30 chicken abattoir revelations on 21 December 2017. This was followed by:

1. On **ABC online of 21 December 2017** the headline was 'Egg farmers accused of colluding with government department to sabotage moves to outlaw battery hens'. The article states that the process:

... has been described by one governance expert as 'collusion' and an 'act of systemic corruption'...

The NSW Government ... deliberately stifled moves to review some of the growing scientific evidence that showed chickens suffered in cramped cages.

Even the Victorian and West Australian governments ... had problems with the way NSW had run the review ...

... The NSW DPI took part in secret meetings of a poultry management group before the standards-writing process had even begun.

... government and industry officials discussed ways they could manipulate the development of standards ...

... a veterinary officer for the department suggested removing the requirement birds have 'sufficient space to stand and stretch limbs' because, she wrote 'You can't do this in a battery cage'.

... FOI documents from DPI show not-for-profit organisations, Animals Australia and the RSPCA had to pay \$3,000 each to cover the costs of considering extra policy options for hen-stocking densities.

The egg producers were funding part of the review and suggested calls for scientific reviews from the animal welfare groups be ignored because they [the egg producers] were paying.

This is another reason why industry should not fund the setting of standards. Nor should industry fund scientific reviews on which standards are developed. The article continues:

When the RSPCA was lobbying for a full and independent review of scientific literature to be done prior to writing new standards, correspondence from the department about the industry's position noted the 'RSPCA, as one member of the Stakeholder Advisory Group [and not a funding partner] should not be allowed to dictate changes to the process'.

Professor Thomas Clarke, who heads the Corporate Governance Research Centre at the University of Technology, Sydney, said the practice of stakeholders having to pay for policy considerations was 'absurd' and 'worrying'.

"I've never heard, in my knowledge of accountable government around the world, of a government charging for contributions to a policy initiative," he said.

He said the whole process appeared to be based on collusion, 'from beginning to end' between the industry and the government ...

NSW DPI chief veterinary officer Christine Middlemiss ... did not deny the undisclosed meetings with the poultry management group ...

When the DPI refused to conduct a scientific review of hen welfare literature, the Victorian Government went ahead and did its own.

It was released in October and found caged hens had five times more bone fractures than hens in other systems.

The Western Australian Government also noted its dissent on the draft standards.

It said in a statement it was concerned they did 'not reflect the latest scientific work'.

'We felt it was really insufficient to meet a developing community standard, WA Agriculture Minister Alanah MacTiernan told the ABC.'

2. On **ABC online on 22 December 2017** the headline is 'WA threatens to pull out of review of chicken welfare standards' The article states:

... It has been angered by revelations ... that suggested the NSW Department of Primary Industries had been colluding with egg farmers to prevent battery cages for hens being outlawed under new proposed national standards ...

Ms MacTiernan said the proposed standards ... were not based on modern animal welfare science and 'did little' to improve conditions for egg-laying chickens.

'Community standards on conditions for egg-laying chickens are changing and industry standards must change with this,' she said ... The WA Government ... will not adopt sub-par standards.

The WA Government said it supported the creation of an independent statutory body to oversee drafting and enforcement of animal welfare standards.

Such a body has previously been recommended by the Productivity Commission.

The Victorian Government also signalled its own concerns with the NSW-led review.

Earlier this year, it conducted its own study of the scientific literature into poultry welfare because it was not carried out during the national review ...

Jed Goodfellow [of the RSPCA] said 'it is an affront to the millions of Australians who care about the welfare of animals'.

Speaking as one of those millions of Australians, I heartily agree with him.

3. On ABC online on 8 January 2018 the headline is 'Executive email reveals stoush over 'stage managed' process to benefit egg industry'. The article states:

... the ... DPI has allowed the drafting of new welfare standards for poultry to be 'stage managed' by industry in a process lacking 'transparency', 'governance' and 'independence'.

They were the 'concerns' of Agriculture Victoria's executive director of biosecurity Cassandra Meagher in an email sent to ... the NSW department ...

In October 2016, Ms Meagher raised concerns the department led a process benefiting the commercial interests of egg farmers at the expense of animal welfare ...

Ms Meagher writes [in her email] Victoria 'became aware' the egg industry 'selectively' or 'incorrectly cited' the work of scientists to support the continued use of battery cages in Australia ...

'We understand that the Australian Veterinary Association and South Australia have similar concerns over the accuracy and transparency of the supporting papers, and it is also of some concern to Victoria.'

'Governance – There is a concern that the process has been dominated by industry stakeholders ... This has resulted in the document [the draft standards] reflecting ... the status quo and ... does not advance animal welfare standards'.

'Transparency – We are concerned that a number of stakeholders (not just the RSPCA Australia) consider that they have not been fully listened to during the process'.

'Independence – This ties in with the above two concerns, in that having a robust independent scientific review prior to the initial drafting of the standards ... would provide all stakeholders with confidence that the process was trying to achieve its aim of both harmonising animal welfare standards whilst advancing animal welfare...'

'... There needs to be an acknowledgement that the attitude of the public and consumers, as well as increasingly that of trading partners, is becoming more demanding of industry and government, particularly when other developed countries are producing livestock to higher welfare standards ...' [end of email quote]

RSPCA Australia Chief Executive Heather Neil is reported in the same article as saying:

‘Contrary to statements made by the NSW Government, the meetings of the Poultry Management Group referred to by the ABC, which took place on 19 January 2016 and 23 February 2015, were not known to, nor attended by, animal welfare groups’

‘The discussions which took place at these meetings ... were directed towards managing the standards development process to entrench cruel and outdated industry practices like the continued use of barren battery cages.

‘This went beyond what could be considered appropriate consultation. It was a form of collusion with the very industry that will be regulated by the standards.

The article continues:

Animals Australia has confirmed ... they have lodged an official complaint with the NSW anti-corruption body ICAC following concerns raised through the 7.30 program’s coverage.

...

Ms Neil said the NSW Government and Animal Health Australia should now be ‘focused on how they are going to restore community confidence in the process’.

‘The only way for this to occur is for the standards to be amended to reflect the scientific evidence, and what the community very clearly says they want through the public consultation ...’

‘This will be their ultimate test of legitimacy and honesty’.

I reiterate that as a member of the public I have no confidence in this process, but nevertheless I am making my submission in good faith stating what I believe the majority of the community want – a phase-out date for all cage eggs, including furnished and colony cages.

D. Senate Motion about poultry standards

On Wednesday 29 November 2017, Senator Derryn Hinch moved the following motion in the Senate, on behalf of Senators Lee Rhiannon and Lisa Singh:

Senator HINCH (Victoria) (15:55): I, and also on behalf of Senators Singh and Rhiannon, move:

That the Senate—

(a) notes that:

(i) 7.30 recently aired footage of hens having their feet torn off and being boiled alive at the Star Poultry Supply slaughterhouse in the suburb of Keysborough, Victoria, in early 2017,

(ii) this footage was secretly recorded by animal rights campaigners, and showed practices which regulator PrimeSafe had failed to identify in regular audits, and

(iii) a number of cases of cruelty to animals in Australian abattoirs have been identified in Australia through covert recording;

(b) acknowledges that:

(i) this year, both the United Kingdom and France have adopted policies to implement CCTV in all abattoirs to deter animal cruelty in abattoirs and support regulators to audit effectively,

(ii) New South Wales (NSW) has mandated the appointment of animal welfare officers in all abattoirs to lift the standard of care for animals, and

(iii) all Australian consumers have an interest in animal welfare, and are entitled to feel confident that meat and poultry on Australian supermarket shelves has not arrived there by way of torture and abuse; and

(c) calls on the Government to:

(i) urgently advocate for CCTV use in all abattoirs at the next Agricultural Ministers' meeting and at the Council of Australian Governments,

(ii) urgently advocate for the national adoption of NSW's policy of appointing animal welfare officers in all Australian abattoirs,

(iii) strengthen the proposed draft Australian Animal Welfare Standards and Guidelines for Poultry to safeguard poultry welfare at abattoirs and on-farm, and

(iv) strongly encourage state governments to respond to evidence of animal cruelty with strong sanctions and prosecution.

Senator Lisa Singh, Labor Senator for Tasmania, states on her website on 29 November 2017:

...We moved the motion because the draft animal welfare standards released by the Turnbull government this week for public consultation will not meet the expectations of the Tasmanian community.

In fact, they have been described by the RSPCA as “embarrassing” and “not based on science or evidence”.

I am dismayed and disappointed by the recent 7:30 report showing hens being mutilated and boiled alive in a Victorian slaughterhouse.

Australia's existing standards are not strong enough to ensure the basic welfare of chickens, while the new draft standards proposed by the government comprehensively fail to meet community expectations.

Despite 84% of Australians supporting an end to battery cage factory farming, these draft standards do not progress the phasing out of the practice.

I am calling on the Hodgman government to review Tasmania's dated Animal Welfare Act 1993 (Tas), improve its regulations of abattoirs and and build on the work Lara Giddings' government undertook to make Tasmania completely battery-cage-free.

Tasmanians should be confident that the local poultry products they consume have been humanely farmed and not subjected to torture and abuse.

The WA, Victorian and SA governments are also unhappy with the process. These governments have responded to growing public opinion to improve animal welfare, including for farm animals. For example:

E. The Victorian government and its Animal Welfare Action Plan – December 2017

The Victorian government has recognised that animals are sentient beings. In the *Age* of 1 January, 2018 under the headline 'Pain, fear of animals recognised' the article states:

The state government's first animal welfare strategy has revealed plans for a major shake-up to protect animals in domestic, agricultural and natural settings.

New laws, to be drafted in 2018, will allow for earlier intervention to prevent animal cruelty and better reflect modern community expectations of their treatment.

This includes in abattoirs.

The government's Animal Welfare Action Plan says new laws covering society's obligation to animals "in all environments, and for all purposes" are required.

"Society now expects that the law should do more to set the responsibilities that humans have towards animals to better protect them from harm, enable earlier intervention and to better provide for their welfare," the document said.

...

Increased scrutiny from the community had prompted an increase in complaints about animal welfare to law enforcement, it said.

Agriculture Minister Jaala Pulford said recognising that animals were "sentient" creatures would be among the legislation's major reforms. "That's an important legal and symbolic change," she said.

It has long been accepted in the community that animals are sentient beings capable of experiencing sensations such as pain or fear. But the proposed legal changes will formalise that concept.

"It's certainly a significant shift," Ms Pulford said ...

Ms Pulford said the agriculture industry had provided leadership in animal welfare, citing the pork industry's phase-out of sow stalls.

...

As part of the strategy, the government will also update training for animal ethics committees, which oversee welfare standards where animals are involved in research projects.

In an email to me dated 2 January 2018, Minister Pulford states:

'Science tells us that animals experience feelings and emotions such as pleasure, comfort, fear and pain ... animal welfare matters. All animals deserve to be treated with care and respect'.

F. The Productivity Commission Report Recommendation:

The RIS quoted selectively from the *Productivity Commission Inquiry Report Overview and Recommendations* (No. 79, 15 November 2016). That commission's final recommendation, which appears on page 2 of the report is:

RECOMMENDATION 5.1

To **facilitate greater rigour** in the process for developing national farm animal welfare standards, the Australian Government should take responsibility for ensuring that **scientific principles guide the development of farm animal welfare standards**. To do this, a stand-alone statutory organisation — the Australian Commission for Animal Welfare (ACAW) — should be established. The functions of ACAW should include:

- determining if new standards for farm animal welfare are required, and if so, to develop the standards **using good-practice public consultation** and regulatory impact assessment processes
- publicly assessing the efficiency and effectiveness of the implementation and enforcement of farm animal welfare standards by state and territory governments
- publicly assessing the efficiency and effectiveness of the livestock export regulatory system and making recommendations to improve the system ...

On page 38, the final report states:

Animal welfare regulations seek to achieve welfare outcomes that (among other things) meet community expectations. However, **the current process for setting standards for farm animal welfare does not adequately value the benefits of animal welfare to the community**.

The process for setting standards would be improved through the creation of a statutory agency responsible for developing national farm animal welfare standards **using rigorous science and evidence of community values for farm animal welfare**. “

...

It should also include animal science and community ethics advisory committees to provide independent, evidence-based advice **on animal welfare science and community values**. [my red highlights throughout the quote]

Judging by what has happened with these draft poultry standards, the above recommendations should be implemented as soon as possible to reassure the community that there is no bias and there is complete independence and transparency in the standards setting process.

I turn now to the draft standards:

G. Australia's animal welfare standards are lower than other industrialised countries.

The proposed standards go against global animal welfare trends. Way back in 1989, Swedish egg farmers were given 10 years to phase out battery cages.

In the European Union, battery cages were prohibited across all 28 member nations from 2012 as a result of pressure not only from the public, but also from producers, retailers, consumers and the media.

Switzerland banned cages 20 years earlier. New Zealand will phase out battery cages by 2022. Canada is in a phase-out period. In the USA, the states of California, Michigan and Ohio have phased them out, and several major retailers have banned the use of cage eggs in their products. In Australia, only the ACT has legislated against the use of battery cages.

Around the world many purveyors of fast food and huge multinationals such as Nestle and Kraft-Heinz have pledged to buy only cage-free eggs. In Australia, public

opinion has driven an increase in the use of cage-free systems. Major supermarkets and food service companies are following suit. Convenience food brands are also going cage free – for example, Grill'd, McDonald's, Hungry Jacks and Subway.

See pages 19 and 22 of the Voiceless report *Unscrambled – the hidden truth of hen welfare in the Australian egg industry* for a more complete list of progressive countries and cage-free pledges by companies that put to shame the Australian government and industry inaction on poultry welfare.

H. Biosecurity

It has been argued by government and industry that the raising of free range chickens poses a biosecurity risk. I recall a video taken by activists at the 'Egg Corp Assured' PACE factory farm in NSW. It showed abandoned hens surviving by living on beetles and eggs in the manure pits below the rest of the caged birds. Not only does this show a lack of care for chickens, I cannot imagine a greater biosecurity risk. A Humane Society of the United States public health report entitled 'Human Health Implications of Intensive Poultry Production and Avian Influenza' concludes:

Genetic selection for productivity and the stressful, overcrowded, and unhygienic confinement of animals in industrial poultry production systems facilitate immune suppression in birds already bred with weakened immunity, offering viruses like avian influenza ample opportunities for spread, amplification, and mutation. Placing genetically un-diverse birds into these kinds of unsanitary environments with inadequate ventilation and sunlight exposure is believed to provide a ripe "breeding ground" for the emergence and spread of such diseases as virulent avian influenza—diseases with human public health implications.

I believe that well-run free range enterprises do not contribute to greater disease risk.

I. Science and the RIS and the importance of peer reviewed science-based standards

I do not trust the 'science' relied on in the RIS, especially bearing in mind the above recommendation of the Productivity Commission after its extensive consultation. For a start, the egg industry should not be funding either the scientific research or the standard setting process itself. Independence should be paramount

Professor Clive Phillips, from the Centre for Animal Welfare and Ethics at the University of Queensland, wrote an article in 'The Conversation' of 1 December 2017 entitled 'Proposed poultry standards leave Australia trailing behind other industrialised countries'. In the article he talks about how caged birds are unable to exhibit their natural behaviours and that:

Scientists ... proved that birds have a strong motivation to perform many of the behaviours that were rendered impossible in the cages, such as laying eggs in a nest. They also found that birds in small cages are more fearful than those in more spacious accommodation. Research has also shown that hens don't adapt to the cages, because the longer they are confined the more they compensate by flapping and stretching when released.

On 'furnished' or enriched cages, the Professor states:

The Australian standards argue that these are only required for the birds' mental state, not their biological functioning. This view implies that a hen's mental suffering is unconnected to its welfare, a claim that has been steadily eroding in the face of research into animal consciousness.

For example, my research group recently discovered that hens' vocalisations are more informative to other hens than thought possible, demonstrating their capacity for rich communication.

To deny the significance of an animal's mental state is to deny the premise of animal welfare at all. Without this consideration, animals would basically have the same rights as plants.

Despite this, the proposed standards' accompanying paper relies on narrowly restricted studies, such as a report from industry body Australian Egg that claims there are no difference in the stress levels of birds in battery cages, barns and free-range farms.

Only 12 flocks in total were studied. The stress hormone cortisol was used as the basis of comparison between farm types even though little enters the egg, and confounding variables are likely to affect cortisol levels.

These limitations are why much animal science today looks at welfare in terms of behaviour, disease and lifetime measures as well as biological markers.

D. M. Broom's 'Stress and Animal Welfare' research into animal consciousness has found that hens' mental states affect their welfare. At page 45, the RIS quotes from research by D.M. Broom that:

Apart from physiological functioning, physical condition and performance, brain state, behaviour, and even an animal's emotions, are now all recognised as key factors in assessing an animal's welfare.

To deny this, is to deny animal welfare.

J. NZ experience on furnished cages

I am also opposed to furnished cages, which have now been abolished in New Zealand. The NZ experience shows that it is a waste of money for the egg industry to invest in furnished cages when overwhelmingly public opinion is against any sort of cage. This is self-explanatory from an article in the *Weekly Times* of 7 February, 2018 under the headline 'NZ farmers lose out on furnished cages', which states:

New Zealand egg farmers have warned their Australian colleagues not to repeat their mistake of spending millions of dollars on now redundant furnished cages, with perches, scratch pads and nests.

Egg Producers of NZ executive producer Michael Brooks said the Government introduced a welfare code in 2012 that gave farmers 10 years to phase out conventional cages, telling them to move hens into furnished cages, or colony cages as they are referred to in NZ and Europe, barns or free-range systems.

But after spending millions of dollars on furnished cages, Mr Brooks said the NZ supermarkets stepped in last year to announce that from 2025 they would no longer stock eggs from any caged system — conventional or colony.

"Many of our largest farmers, about 14 per cent, had spent millions investing in colony cages," Mr Brooks said. "It's been difficult for farmers who went early, relying on the code, and have now been penalised by retailers."

Animal welfare groups pushed NZ supermarkets into phasing out the sale of all forms of caged-egg production,

The SAFE for Animals welfare group led a campaign calling on consumers to boycott colony cages, labelling their introduction a "cruel" con.

In Australia, egg producers are under similar pressure from the RSPCA and other animal welfare groups to abandon cages as part of a national debate on introducing new poultry welfare standards.

Draft guidelines released late last year for public consultation, by the joint state and federal governments' Animal Welfare Task Group, recommended the ongoing use of conventional layer cages.

However Australian egg producers are increasingly concerned Victorian and West Australian Labor governments are pushing for conventional cages to be phased out and replaced with furnished cages.

Animal Health Australia estimates the cost of replacing conventional with furnished cages is \$935 million.

The obvious conclusion from the NZ experience is for the Australian government and the egg industry to recognise and acknowledge the growing consumer backlash against ALL cages and make a business decision not to waste their money building furnished cages. A furnished cage is still just that – a cage. The community does not want hens in cages. Ban them!

As quoted on page 5 above, the Victorian government commissioned its own peer-reviewed and independent *Farmed Bird Welfare Science Review, 2017*. It describes scientific findings that show that housing and husbandry practices permitted by current laws for poultry cause great suffering. The review deals with layer hens and breeders, broilers and breeders, ducks, geese, turkeys, guinea fowl, pheasants, Partridges pigeons, quail ostriches, emus and their slaughter. Animal emotion is also studied. The report found:

The conventional cage system prevents birds from performing basic movements essential for good health (walking, wing stretching) and denies birds the possibility of expressing their behavioural needs to roost, nest and forage, or their motivation to dustbathe, due to an inherent lack of resources..."

Furthermore the restricted space per hen in battery cages is 'associated with increased mortality, an increase in physiological stress and compromised immune function'.

The RSPCA review, *The Welfare of Layer Hens in Cage and Cage Free housing Systems 2017*, concludes that the problems affecting hens in cage systems are caused by the cages themselves. As the RSPCA website states:

"These objective findings [see above] are consistent with the RSPCA's own peer-reviewed and published comprehensive scientific review

Independent research commissioned by the RSPCA in November 2017 found 84% of Australians want battery cages phased out, while for 65% of Australians, concern over battery cages impacts upon their decision whether to buy or eat eggs or chicken.

Two scientific reviews come up with the same result. I believe no cage can ever meet the behavioural needs of chickens. Hens are smart, inquisitive and social beings. They have good memories and the ability to make complex decisions. For their welfare they need freedom to move and choose when and where to nest, stretch, flap their wings, perch and dust bathe – all of which cannot be done in a battery cage.

Any review of standards **MUST** consider the latest peer-reviewed science, community expectations and current industry practice. The Productivity Commission report states at page 22:

Standards and guidelines should be more evidence based, drawing on the existing body of evidence on animal welfare science and research on community views of animal welfare. Such evidence should also be used in RIA processes. There should be more independence in the standards development process so that outcomes are not overly influenced by the views of any one group, either industry or animal welfare groups. Judgments made to balance conflicting views should be transparent and apply rigorous scientific principles. Surveys of community values for animal welfare should be statistically robust and transparent.

K. Proposed standards – in detail

- 1. Phase out of all cages** - A standard must be included in 'Chapter B1 – Laying chickens' to ensure that **all** battery cages (including furnished and colony cages) for layer hens are phased out. A standard must be included in 'Part A facilities and Equipment' to prohibit housing **any** birds in **any** cages. Wire mesh floors in cages giving hens an area the size of an A4 page are barbaric, because hens must stand, sleep, eat, defecate, and still lay eggs every day of their short lives in this cruel environment. Studies have shown hens suffer weak bones and metabolic fatty liver disease and live in chronic pain with untreated broken bones. It is only natural that hens peck each other in frustration as they cannot establish a normal pecking order. The industry's answer – to trim sensitive beaks without pain relief – extends the cruelty even more unacceptably.
- 2. Stocking densities** - The proposed standards must follow the plentiful scientific evidence available, as well as that provided by the RSPCA with regard to stocking density on page 230 of the RIS. I also refer to other science I mentioned above. The draft standards do not allow enough space for birds to move freely or carry out normal behaviours. Stocking densities for all species must ensure each individual bird has sufficient room to move and to express its normal behaviours.
- 3. Dust Bathing and foraging** - There is no standard requiring that poultry be provided with litter for dust bathing and foraging. A standard must be included in 'Chapter 8 – Litter Management' that ensures all poultry housed indoors must have access to a littered area to allow for foraging and dust baths.

4. **Perches** - Although there are recommendations for perches, no standard enforces this. In Chapter 4 'Facilities and Equipment' a standard must be inserted to ensure adequate perch space is provided to all poultry with a motivation to perch.
5. **Light levels** – The proposed standards allow poultry to be kept in near-dark conditions for most of their lives, not allowing the expression of normal behaviour and eye development - and without adequate light and dark periods for normal behaviour and rest. Standard SA 6.3 in 'Chapter 6 – Lighting' must be amended to ensure that the minimum light intensities for all poultry be increased to at least 10 lux. Standard SA 6.5 must be amended to require 8 hours of continuous darkness in each 24 hour period for all poultry. The only time birds see daylight should not be on their way to slaughter!
6. **Nests** – The proposed guidelines recommend sufficient nests for hens, but guidelines are not enforceable. Urgently, Guideline GB1.6 must become a standard in Chapter 4 'Facilities and Equipment' to ensure that all hens of all species must be provided with nests.
7. **Forced Moulting** – This practice must be banned. The starving of birds causes health and welfare problems – intense hunger, stress, loss of feathers and body weight with a reduction in bone mineral density and risk of death – just to keep hens alive for another egg laying season! The European Union and other countries have banned it
As the peer reviewed, Victorian Government *Farmed Bird Welfare Science Review October 2017* states:
The practice of forced moulting has a substantial negative impact on bone mineral density and content (LH8.3c)
8. **Beak and bill trimming** – This practice must be banned on the grounds of cruelty.
9. **Transport, Stunning, Slaughter and on-farm killing** – Proposed standards must better safeguard the welfare of poultry at abattoirs and on farm. Under the Chapter 'Poultry at slaughtering establishments' strict standards must be implemented to ensure welfare at abattoirs and to prevent the shocking failures the community has witnessed on television recently.

The maceration and gassing of 12 million male chicks annually must be banned. New technology is available to end this horrific practice. For example, the ABC website of 12 March 2016 'Marking male embryos could hold solution to chick culling 'ethical dilemma' in global egg industry' states:

Scientists at the CSIRO's Animal Health Laboratory say they can use biotechnology to ensure the males are never born, let alone culled.

See also page 19 of the Voiceless report *Unscrambled – the hidden truth of hen welfare in the Australian egg industry*, which describes how The Netherlands and Germany are using 'in ovo sexing' to avoid having to macerate chicks.

Killing of farmed adult birds is a long process with potential for cruelty at every step. First they are grabbed and shoved into transport crates. Transport is risky in itself. I cite a recent, but not isolated, case with horrific pictures of traumatised and dead birds - "Chicken death toll doubles after crash leaves \$300k damage bill" *Geelong Advertiser*, 17 January 2018. The article states:

Turi Foods said 2894 birds have been euthanised following the accident.

Andy Meddick from the Animal Justice Party said it was the worse he had ever seen. In the article he is reported as having said:

'We witnessed multiple birds die in the removal process when a forklift driver dropped the crates containing those chickens who survived the initial crash'.

Caged hens are particularly at risk throughout transport, because of their brittle bones. At the abattoir they are left hanging upside down for several minutes. This is painful for heavy birds or those with damaged or broken limbs. High-throughput slaughterhouses operate on strict time schedules and as abattoir investigations reveal again and again, there is no incentive to avoid animal cruelty. If not killed by electrocution and throat cutting, the birds are dragged alive into boiling water. Such a horrific scene was seen on ABC 7.30 on 15 November 2017. Yet the owners of the abattoir were still allowed to keep operating.

Current state and national regulations fail to prevent cruelty in slaughterhouses. Draft standards must be changed to no longer permit electrical-water-bath stunning and throat cutting. Alternative and comparatively less cruel slaughter methods such as controlled atmosphere stunning and killing (CAS) with non-poisonous gas, or low atmosphere pressure stunning and killing (LAPS) must be adopted to reduce handling, stress, and injuries to birds.

At page 21, the RIS boldly states there is 'no evidence that risks to animal welfare are systemic'. Where is the proof? Without independently monitored CCTV, no-one knows what goes on in abattoirs. Members of the public like me fear that cruelty in slaughterhouses IS systemic, because whenever activists enter premises, they find evidence of serious welfare breaches. The community is thankful for the activists who alert the public to these continual breaches.

10. **CCTV** – To alleviate widespread community concern, independently monitored CCTV cameras must be mandatory in all housing sheds and abattoirs. Designated animal welfare officers must be employed in all abattoirs. Under 'Chapter 10 - Humane Killing' more requirements must be added to include unacceptable methods. It must be clear to industry what is NOT acceptable.
11. **Meat chickens** --These birds have short, painful lives in crowded sheds, with no proper rest. Light requirements are inadequately balanced. There is not enough light, which causes eye deformities. Exercise is inadequate. Their unnatural weight causes problems with pressure on joints and hearts. Resultant lameness means they can't reach food or water. The 4% mortality rate in sheds is considered acceptable! Some 25 million birds suffer and die each year. As a minimum industry must choose more naturally slow growing

breeds to prevent health and welfare problems associated with fast, unnatural growth. Stocking densities must be reduced and birds must have straw bales, perches, dust baths and opportunities for foraging and outdoor range. Birds must have 8 hours sleep and experience daylight to maintain healthy eye development.

12. **Starving 'parent chickens' – breeding stock** – Because they are Intensively bred for rapid meat production, their breast tissue is physically out of proportion to the rest of their bodies. They cannot move freely – they are lame and suffer foot pad dermatitis. The standards must reflect the science in the Victorian government's *Farmed Bird Welfare Science Review*, which states that 'evidence for these chickens suffering from chronic hunger is indisputable.' It also states that severe feed restriction and 'skip a day' feeding patterns for breeding stock 'has clear negative effects upon broiler breeder welfare'. Genetics is the way to address many of the health problems with farming these parent birds and the selection of animals with more natural slower growth rates (birds that do not need feed restriction) must be a priority.
13. **Ducks and water** – Without water, ducks cannot clean properly, are more susceptible to heat stress, respiratory illness and crusty eyes, leading to blindness and lameness. All farmed ducks must have access outdoors and to open pools or troughs. High stocking densities cause stress and pecking. Reducing densities will obviate the need for debeaking, which must be banned.
14. **Turkeys** – These birds are raised in cramped sheds and bred to develop fast. They become so heavy they struggle to move. They act aggressively in crowds. The industry answer is to 'trim' sensitive beaks without pain relief. Selective breeding for maximum breast meat has led to lameness, because the birds are crippled by their weight. There are problems with mating and artificial insemination is used. At the slaughterhouse there are problems with shackling very heavy turkeys for 3 minutes before killing.

Standards must be rewritten to enforce natural, smaller and slower growing species to alleviate problems with fast growth. Beak cutting must be outlawed. Improved housing and husbandry should reduce aggression and injuries. There must be more space and environmental enrichment with perches, straw bales and flooring materials to scratch in and explore and free range so that the turkeys can live as normally as possible.

The Victorian government's *Farmed Bird Welfare Science Review* describes scientific findings that show that housing and husbandry practices permitted by the current laws cause great suffering. All species must be offered significantly improved protections to shield them from crowding, painful husbandry practices, welfare consequences of selective breeding and surgical mutilations (with or without pain relief) and slaughterhouse cruelty.

L. Conclusion

Battery cages, including, furnished and colony cages, must be phased out as soon as possible. Most Australians are opposed to cage eggs. The animal welfare science is unequivocal. Caging layer hens in battery systems causes **great suffering** to them **every single day**. The current standards with battery cages and high stocking densities go against worldwide trends and public opinion.

It is a fact of life that industries of all kinds have to adjust to new methods because of community pressure. It should not be assumed this will negatively impact jobs. Free range facilities and husbandry methods usually require a higher staffing ratio. So when cage eggs are phased out, it is more likely that there will be more jobs, not fewer, thus contributing to regional economies.

Importantly, the current system of standard setting for the regulation of agriculture **MUST** be reformed to remove obvious conflicts of interest of the type I quoted from earlier in my submission. Peer-reviewed scientific evidence and community input must be applied so that the people can renew their faith in the way farms are regulated. Again I call for the establishment of independent national body to set standards for farm animal welfare, as recommended by the Productivity Commission report in 2016.

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