



PROPOSED AUSTRALIAN ANIMAL WELFARE STANDARDS & GUIDELINES FOR POULTRY

CONSULTATION REGULATORY IMPACT STATEMENT

FEBRUARY 2018

1. AUSTRALIAN EGGS

Australian Eggs is an egg industry-owned public non-listed company which integrates marketing, research and development and industry services for the benefit of egg farmers and other stakeholders.

Australian Eggs services all known Australian egg farmers irrespective of their size, location or farming system. Importantly, Australian Eggs is not an industry representative body (**IRB**) but in order to perform its role as an industry services body effectively, Australian Eggs consults with IRBs.

Given Australian Eggs is not an IRB, it is not in a position to provide a detailed submission in support of particular options under the Consultation Regulatory Impact Statement (**RIS**). Australian Eggs understands that detailed submissions on the RIS options will be provided by egg industry representative bodies. Australian Eggs encourages decision makers to have regard to these submissions as they provide a unique perspective of the application of animal welfare in context.

2. STANDARDS AND GUIDELINES PROCESS

Australian Eggs supports the development of animal welfare Standards & Guidelines for poultry (**S&G process**) as an effective mechanism to outline the relevant considerations for poultry welfare.

Consistent with its mandate, Australian Eggs has had a role in the RIS process as a provider of information about the egg industry. This includes information regarding industry practices that form the proposed Standards & Guidelines and information regarding the cost of options under the RIS.

The driver of the S&G process was identified at its inception as the need for ongoing review of animal welfare standards to ensure they remain consistent with mainstream community and



trading partner expectations. Given the current animal welfare standards for poultry have not been reviewed for 15 years and are voluntary, the potential for refinements to the standards and a move to legally enforceable obligations have been the central objects of the process.

In considering these questions, the relevant decision making principles were identified as developing standards that are desirable for livestock welfare, feasible to implement, important for the livestock welfare regulatory framework and achieve the intended outcome for livestock welfare.

These issues and questions remain the key subjects of the S&G process and should frame the considerations set out in the RIS.

Animal welfare is a naturally contentious issue and it is inevitable that the process would be questioned by parties seeking to propagate their positions. Australian Eggs encourages the public and decision makers to recognise that the RIS provides a detailed and balanced overview of the relevant issues, science and impacts of the regulatory options. For sustainable decisions to be made, it is important that these considerations are not overlooked in pursuit of a particular outcome.

3. THE EGG INDUSTRY AND THE COMMUNITY

The Australian egg industry is a primary stakeholder in the S&G process as it relates to layer hens. It has the capacity to provide relevant information to inform the process on key issues such as the application of animal welfare standards and guidelines in context and the implications of particular regulatory options. The egg industry will also be the primary stakeholder group impacted by the outcome of the S&G process as the regulatory settings will be felt first and most directly by the egg farmers.

However, it is important to recognise that the egg industry is not a proponent nor opponent of the S&G process. The egg industry ultimately operates to make a contribution to the Australian community and it is the impact on the community that should be the relevant driver of decision making.

For instance, regulatory settings that are favourable to industry, such as the status quo or relaxation of animal welfare standards, could provide benefits in the form of lower cost eggs but fail to reflect mainstream community attitudes. Equally, settings that may be bad for industry, leading to business failures or cost increases, are relevant due to the consequent impact on the community, being job losses, reduced incentives to invest, reduced access to good quality protein and higher cost staple food.



Like all regulation, the S&G process should be considered as a balance between competing community objectives of maintaining appropriate animal welfare standards and ensuring that safe, secure and affordable staple food is available for the Australian community. The decision making principles of the S&G process seek to capture this dynamic and should be the key points of reference for decision makers.

4. CAGES

A substantial amount of public discussion regarding the S&G process and the RIS has concerned cage egg production. In some ways, this is unfortunate, as this focus may have come at the expense of close consideration of a range of other important issues under the RIS that have the ability to significantly impact animal welfare outcomes in the egg industry.

For example, the changes to beak treatment practices under the S&G have the potential to impact the ability of egg farmers to manage the natural pecking behaviour of hens. A stronger understanding of this dynamic by the public and decision makers would be a genuine dividend of the S&G process and Australian Eggs hopes that this has been achieved.

However, Australian Eggs does recognise that cage egg production is an important issue. Cage eggs represent both an area of concern to a significant number of people and an important source of affordable nutritious protein for the majority of Australians

Australian Eggs hopes that the opportunity for public consultation on the animal welfare outcomes in cage egg production has the effect of educating the public and decision makers on the relevant considerations. While this issue will involve individual value judgements, Australian Eggs would encourage all interested parties to consider this issue on the balance of the comprehensive material provided in the RIS.

5. THE CHALLENGE OF ANIMAL WELFARE

The RIS provides a very strong factual basis to engage on issues related to animal welfare regulation. It does not, however, provide guidance on how to have a sensible debate about animal welfare.

The S&G process comes at a time in which the quality of debate regarding animal welfare is at a low point and descending. Animal welfare campaigns that present a one-sided, over-simplified and emotive picture of animal welfare issues have been extremely successful in gaining public and media attention and building a support base for animal welfare organisations. However, these campaigns have been counterproductive in progressing meaningful engagement on animal welfare issues and ultimately, progress in genuine animal welfare outcomes.



Australian Eggs sees this as a loss for all stakeholders and ultimately the Australian community. Australian Eggs does not profess to be expert in engagement processes but offers the following perspectives to encourage all stakeholders and decision makers to participate in genuine and productive debate on animal welfare issues:

1. Progress on animal welfare cannot be achieved in the absence of farmers. Farmers are at the frontline of animal welfare and are the only parties that have the capacity to deliver outcomes. The notion that the perspective of farmers should be set aside on any basis, including a perceived conflict of interest, is folly and puts at risk the welfare of animals.
2. Progress on animal welfare requires the balancing of competing objectives, and ultimately, patience. Impatience may be natural but it can be counterproductive and impede consideration of meaningful progress.
3. Progress on animal welfare requires recognition of progress made. Absolutism in the pursuit of outcomes undermines the quality of the debate and the incentives for farmers to implement improvements.
4. Progress on animal welfare requires recognition of the capacity of science to inform the debate, and not be a substitute for a debate. Science is highly relevant to animal welfare but cannot answer the ultimate question for the community as to the appropriate balance between competing objectives. Failing to recognise this degrades the value of science and the debate.

It has been disappointing to see the public debate surrounding the S&G process take place with insufficient regard to these perspectives. Australian Eggs hopes that, regardless of the outcome of the S&G process, it forms a turning point in the quality of debate regarding animal welfare issues with a greater focus on the relevant dynamics going forward.

6. AUSTRALIAN EGGS WORK PROGRAM

The S&G process and the strong response to the RIS demonstrates the increasing importance of animal welfare to the community and to the sustainability of the Australian egg industry. Australian Eggs has an important role in building an understanding of animal welfare as it relates to layer hens and has been reviewing its activities in this regard.

In 2017 Australian Eggs released its Strategic Plan 2017-2021 in which it confirmed that animal welfare remains a key focus area under the sustainability work program. Current activities include operating introductory and advanced training programs to invest in the skills of workers in the egg industry in a range of areas including animal welfare. Australian Eggs also has research projects underway to explore improvements in farming practices to address welfare issues, as well as research projects to develop vaccines to address significant health risks to hens.



These projects reflect Australian Eggs' traditional approach to progressing animal welfare issues which have always been farmer driven. Through engagement with egg farmers, Australian Eggs has identified the priority issues impacting hen welfare and invested in the development of know-how that can be adopted on-farm and have a positive impact on hen welfare and industry sustainability.

7. FUTURE FOCUS AREAS

In light of the issues outlined above and the significant public response to the RIS, there appears to be scope to increase Australian Eggs activities relating to animal welfare, particularly as they relate to our mandate as a provider of information about the egg industry.

As part of developing the new Annual Operating Plan for 2018/19, Australian Eggs is exploring expanding our government engagement activities to ensure that regulators and decision makers have access to accurate information about the egg industry. It is hoped that by providing a robust, factual footing for decision makers to work from, Australian Eggs could assist in narrowing the focus of debate on contentious issues such as animal welfare.

Engaging with government is an important part of Australian Eggs' activities and will continue to be undertaken to ensure government stakeholders can consider industry issues on an informed basis. To allay any concerns regarding the relationship between industry and government, these government engagement activities will be conducted on a transparent basis so that all stakeholders have an understanding of the nature of that engagement and access to the information provided.

In addition, Australian Eggs has identified potential benefits of increased community engagement and is exploring the development of a Sustainability Framework for the purpose of enhancing the quality of engagement between the industry and its stakeholders. The key element of a Sustainability Framework is that it focuses on issues that are identified as relevant by egg industry stakeholders, and in particular, the community. This could relate to any impacts the egg industry may have, positive or negative, in key areas such as the lives of people, animal welfare outcomes, environmental impacts and economic viability.

Done properly, a Sustainability Framework will involve a higher level of transparency over the entire egg supply chain and by increasing community understanding of farming, demonstrate that the industry operates responsibly and is committed to ongoing improvement. It is expected that this initiative will contribute to a higher level of understanding on animal welfare issues in laying hens and improve the quality of the debate on these issues going forward.