

Welfare Standards Public Consultation,
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A Submission to change the existing Animal Welfare Standards for Poultry.

INTRODUCTION

In my opinion the egg industry in the main is a quagmire. Why has it taken 15 years to upgrade/change the Poultry Code? Why hasn't Australia phased battery cages out when most developed countries had by 2012? When researching I have questioned the integrity of the system/process and the latest claims by the R.S.P.C.A. of collusion and corruption strengthens my suspicions. The production system is flawed from beginning to end. All areas from government to abattoirs need scrutiny and reforming.

'Modern industrial agriculture might well be the greatest crime in history'. * We witness many areas which have no regard for an animal's intrinsic, social and psychological needs. It is so wrong to aim for happiness for humans and ignore and neglect our vulnerable animals/poultry who are completely dependent on our care. We have in the poultry industry some producers who have a complete disregard for these basic needs.

From childhood we have our favourite nursery rhymes and pictures of Henny Penny and always the farmyard scene with a clucking mother hen with her chickens following. In real life we treat her cruelly. The hen is a sentient being who has complex, natural behavioural needs and drives. She wants to experience day and night, the sun, the wind and the weather. We know she can act methodically, make decisions and she does have a memory so she certainly has a capacity to think. We have no moral right to put her in a restrictive cage and deny her a normal existence. She is a victim of a production system concentrated on profit and not welfare.

There are some Australians whose psyche have a disregard for animal welfare and reveal an attitude of callousness, e.g. in a video, the person transporting hens, says on dragging one hen with a broken leg out of a cage, "shut up or I will break the other one". The big egg producers who have invested in cages have this callous psyche.

The majority of the public want change and are disgusted by the present cage systems. Proof of this is the rise in Free Range egg sales and the overall increase in people adopting the Vegan way of life.

In writing this submission one should feel a sense of hope for change but unfortunately with the purported collusion it seems the final conclusions are already predetermined in favour of the egg producer.

Yours truly,

Val Maslen

* Quote from Sapiens A Brief history of Humankind' by Yuval Noah Harari.

SUBMISSION PROPER

In Australia today, the life of a hen = that most inoffensive of creatures - is most likely to be pain layered on pain. Trapped within a cage, she balances on wire while the glare of artificial light shows that her agony is also the pain of thousands of her fellow creatures. Thus her life is devoured as she lays the eggs we humans love to devour. And why is this? Because the law allows it. Some would call the practice just good economics. I call it Australia's shame!

.Australia has disgracefully fallen well behind other developed countries hen welfare policies. This is the first time the Poultry Code has been revised in 15 years. In Australia the 2009 Code of Practice permits the use of battery cages. A written commitment by the Federal Government to review the practise was scheduled in 2010 **but there was no further communication.**

The present convoluted governance is structured to delay/extend any change giving the egg producers years more production. We have the Agriculture Department (Department of Primary Industries) at the top whose role is to maintain the welfare of animals/poultry and also the promotion of the poultry and egg industries. This is a real conflict of interest and history shows the D.P.I. has neglected the welfare of hens in many areas.

Next we have the Agriculture Senior Advisory Committee(AgSOC) made up of top level government heads and C.E.O.s dealing with agricultural issues of national significance.They must take some blame for the present situation. The standards are developed under the auspices of The Animal Welfare Task Group, high level representatives from each State who report to AgSOC. They are leading the project for changing The Poultry Code Standards and Guidelines.

Freedom of Information obtained by RSPCA revealed 'systemic collusion' between Dept. of Primary Industry bureaucrats and egg farmers. One governance expert described it as 'collusion and an act of systemic corruption'. It was stated that DPI worked in secret with industry representatives for at least 18 months. They deliberately thwarted moves to outlaw battery hens before drafting the new standards by changing/omitting wording. Dr Steven Atkinson, the independent Chair also was at one of the meetings. The Victorian and Western Australian governments signalled they had problems with the way NSW had run the review. NSW is the largest egg producer in the country. The general public have been frustrated and shocked over this news and although AWTG refuted the claims I personally have a deep distrust in view of the present situation. How will we ever see cages abolished with this happening?

A big concern is that the development process for changing the Poultry Code is funded by the Government, Aust. Chicken Meat, Aust Egg Corp., Aust. Duck Meat and Aust Turkey Org. You then have Stakeholder's Advisory Group whose members are a majority of egg industry driven people and a minority of animal welfare representatives. We also have Animals Health Australia, the top facilitator having Australian Egg Corporation as a one of the paid members of the company.

Was there collusion earlier when the Free Range standards were developed and Dr. Steve Atkinson, again the Chairman, refused RSPCA's request to put cage eggs on the Agenda? In view of the 2+ years it took surely efficiency would have dictated this perfect timing, rather than have two separate processes? This tardiness has given the Egg Industry extra years in caged egg production.

We saw many flaws when the Free Range standards were passed. Federal Ministers Barnaby Joyce and Kelly O'Dwyer with member of Parliament, Vincent Dominello passed a standard for Free Range farming of 10,000 hens per sq hectare. **Our Scientists from CSIRO recommended 1,500 and said 10,000 was unsustainable. United Kingdom and**

Europe have a Standard ratio of 2,500 hens per sq hectare much closer to our scientists figure. The Europe Directive was well prepared with scientific backing in 2012. D.P.I., Animal Welfare Task Group, Animal Health Australia and The Stakeholders' Advisory Group had taken years to come up with their ridiculous figure. Instead of it being a healthy outcome for the hens we will be looking at a flawed, substandard life with problems which go with "Being unsustainable" i.e. health problems, overcrowding in sheds, disease, dust, fumes, eye and respiratory problems etc.

The figure is 6 times over the recommended rate and an insult to our top scientists. There were 149 submissions and thousands of responses from various stakeholders and the public. RSPCA and other animal welfare groups thought the whole consultation process was hijacked and heavily influenced by the industrial, intensive egg producers. The end result was bad for the consumers, genuine free range farmers and the hens. CHOICE was one of the first to advocate boycotting eggs from companies with high stocking densities of 10,000. Spokesman, Tom Godfrey said "these new rules fail the commonsense test. Hens were being raised in unnaturally large stocking densities and these farms do not meet consumers expectations and don't deserve the free range label"

Three animal welfare scientists, Dr Rault and Professor Hemsworth from University of Melbourne and Professor Widowski from Canada said that their scientific work had been inaccurately and selectively referenced and had to be rectified. According to 'Voiceless' there is an over-reliance on industry based science or the selection of science that reinforces the status quo.

The only positive with the 10,000 figure is that the hens at least have their feet on soil not wire.

11 million battery cage hens sit on wire at this moment with no relief in sight. 6 months ago when phoning Primary Industries, AHA and Agriculture Dept. I was told there was no phase out date and one said consumers were still buying them so they would stay. Egg farmers of Australia chief executive, John Dunn, said "Egg farmers would continue with caged production because it was CHEAPER FOR CONSUMERS." Definitely a money issue and not a hen welfare issue. Anecdotally consumers are generally more willing to pay extra for animal welfare e.g. the pork meat industry with sows in confined pens

Poultry welfare principles from the World Organisation for Animal Health which Australia accepted have among their regulations 'that animals be comfortable and able to express their innate behaviour.' The definition of innate is 'existing naturally in anything, inherent, born in an animal, natural, inbred, native'. How can the Australian government justify a cage system?

As a life in Nursing and a past Director of Nursing, when considering the welfare of a patient I would not be asking the Drug companies for any input, or hospital owners on length of stay, etc. in considering the welfare of hens. There is no place for the poultry/egg industry, Economists, Politicians and Government Departments whose main consideration is promotional and monetary. It is like putting Dracula in charge of the blood bank!

The Poultry Welfare Code should be decided by the Scientist, Veterinarians, Ethologists, Researchers, Animal behaviourists, RSPCA and Animal's Australia. in line with The World Organization for Animal Health's recommendation. These scientific based Welfare Standard should be set without conflict of interest. The egg industry etc. then implements and invents the infrastructure to achieve the desired humane outcome for the hen. Economics/profits should not equal cruelty and if necessary the price of eggs will rise.

We know that Switzerland has been cage free since 1992. Germany banned them from 2007, 5 years before the Europe Directive. The Eu Directive stated that battery cages have severe inherent disadvantages for the welfare of hens. Starting in 2011, UK, Europe, NZ, Canada and parts of USA have already phased out or are phasing out cages Even our supermarkets are acting responsibly and stocking mainly free range and IGA stores do not stock any cage eggs. Overseas many big restaurants, food outlets buy only cage free.

With the small space required, a cage is more profitable i.e. the size of an A4 piece of paper allocated to each bird. Every moment of her life is spent in that tiny cage, never to feel the sun, to forage, to dust bathe, to scratch and cluck, to feel grass and earth under her feet

We can't imagine the misery a caged hen experiences. She lives on sloping wire, she cannot flap her wings, she is de-beaked and sometimes painfully de-beaked again. She develops osteoporosis from high egg production and this causes a high amount of fractured leg/wing fractures. From egg laying she has prolapses, tumours and liver complaints. Her claws get growths on them. Every minute of her life she is cramped and limited with fractures sometimes going unnoticed, her mates dying under her feet until they are taken out. It would be impossible to know how many of the 11 million in cages are neglected and suffering, yet go undetected.

The Regulation Impact Statement hilights the obsession with costs over welfare

LIGHTING

The guidelines are for 4 hours darkness to 20 hours light to maximise egg laying in cages but this can give the hen painful prolapses. Financially the extra produce makes cages more profitable. This time frame doesn't correspond to the European Directive and welfare guidelines. **They advocate 6 hours straight or 2 periods of 4 hours in 24 hours.** The Regulation Impact Statement gives a one-off cost of upgrading infrastructure per business but should adopt the extended EU Directive guidelines as mandatory

DEBEAKING

Norway has banned beak trimming/dubbing/castration since 1974. They say it is unnatural to change the animal in this way and by doing so you cut off their emotions and destroying the beak she is born with is very unethical. Their solution was in the breeding of white hens instead of browns, good management and better production systems. Because of industry driven overcrowding de-beaking has become a cruel solution: with cage frustration and crowding the hen becomes fearful, aggressive and will peck another hen.

When the hens are farmed in the 1,500 ratio it is not necessary. Rohdes from Clare Valley Free Range, with a ratio of 1,500, **do not de-beak their hens.** We know de-beaking can cause acute and chronic pain due to tissue damage and nerve injury.. The beak contains a high density of nociceptors (pain receptors) and to them it is like our fingers are to us. In a natural pasture environment the hen will peck over 1,000 times a day. The second de-beak can be extremely painful. One experiment of free range hens found the mortality rate on 2 different flocks, only went up from 3% for the beaked to 4,5% on the unbeaked. The solution is to stop cages and these shockingly high production numbers
The R.I.S. gives a cost on 2nd de-beaking. How absurd!

LABELLING

THE EUROPE DIRECTIVE STATES THE EGG PACK MUST BE LABELLED WITH THE FARMERS METHOD ON OUTER SURFACE IN EASILY VISIBLE AND CLEARLY LEGIBLE TYPE.

On researching Sth Australian labels on cage hen eggs it was almost laughable to see the devious labelling. Out of 10 labels only 4 had **Cage** on top of carton and 6 had put it down on side in the size of a 5 cent piece or cage in small light print and Eggs in bold.

This is very cunning. Add to this words like "Country Fresh", "Farmhouse Fresh" Eggs which certainly don't depict a hen in a wire cage for 18 months in artificial light.

The Australian Government has given the Free Range farmers 1 year to put hen ratio on cartons due in April'18 (very generous). At present, in SA, the consumer has not a clue about some eggs. Our 2 biggest egg producers Days and Attards are not putting ratios on theirs. Days on my enquiry have the full 10,000 limit on their eggs. Attards when I enquired could not tell me as they had different contractors ranging from 1,500 hens per sq hect to 10,000. They have updated the wording on their cartons in gold medallions, pictures etc with **Premium**, **Gourmet** etc but have not put the ratio in. Rohdes and Kangaroo Island proudly, and rightly so, are putting 1.500 ratio on their cartons. Both Days Eggs and Attards received a grant of \$400,000 to \$500,000 from the State Government towards building their Free Range, surely some of that finance could have gone to label their cartons. If our mandatory labelling rules are effective in April I hope to see honest and clear labelling.

THE ENRICHED CAGE

The enriched cage is not the answer. The hen is still in a cage. Despite the small amount of extra room they are confined in space and height on wire. The small laying box supplied can be monopolised by the most aggressive hen and the roosts supplied get greasy. They also take up space. De-beaking will continue and osteoporotic fractures will still occur. The litter area is too meagre and is scratched out of the cage. She will never see daylight only electric lighting until she is dragged out of her cage with more leg breakages to slaughter. Even with the extra built ins she gets very little extra room. There is insufficient room for the hen to engage in natural movements. They are banning the enriched cage in some overseas countries and would prove a very backward step if Australia promoted and installed them.

MEANINGFUL ACCESS FOR FREE RANGE

The Standards requirements.... "Not go everyday but to provide access to and encourage use of the outdoor range on a regular basis. Where access from the indoor environment in which hens are kept impedes, prevents or discourages the hens from accessing or discourages the hens from accessing the outdoor range, then the hen may not have meaningful access."

It requires that free range eggs are laid by hens that are "able to roam and forage on the outdoor range."

So, the egg industry designed **popholes**, barely the size of the hen, cut into the side of their shed. It doesn't equate to meaningful access. These popholes are opened in the morning. In one case I personally know, with free range chickens, the popholes were opened but they stayed inside with the food and water. This was saving wages for extra staff and problems involved with free range (more work). Large opening doors with pastured runs should be mandatory.

Sanctuary Farm said when they rescued 5 hens from these farms, for the first week they grouped in the far corner of the shed because they were scared to go outside. When going into the outdoors they looked upwards to the sun, then laid down on the soil and stretched out their wings in bliss.

Another standard requirement 'Provide birds with palatable vegetation'... a free range near me hasn't a blade of grass.

MEAT CHICKENS

The chicken meat industry is another abomination of animal exploitation. An egg industry invention! The chickens are genetically selected to grow quickly and reach slaughter age in 40 days. With extra lighting and food and excessive weight gains the chickens legs, heart, lungs cannot support the rapid growth. Some get broken legs, are unable to stand and cannot walk. They are then slaughtered. Norway says these problems

could be reduced by use of slower growing broiler genotypes to a life of 56 days. The Europe Directive has a standard of the birds having access to open runs covered mainly by vegetation for 1/2 of their life.

SLAUGHTER OF DAY OLD CHICKS.

In the yearly killing of millions of day old, male chicks a year by gassing or macerating them live between rollers, we see a disgustingly cruel system. One person, I know, who worked on the conveyor belt said sometimes the chickens fell off the conveyor belt and in their trusting mind they tried desperately to get back to join their mates on a path to their shocking death. These are not blobs of clay, they are bright eyed, thinking, feeling baby birds. In Germany the scientists think they will have the science ready for embryo male chicken testing so the cycle can be stopped. It could be ready for Australia by 2018. **Has there been any initiative to order and use this technology as soon as possible?**

On reading the present draft Poultry codes, I was amazed at the simplicity of some of the rulings which should have been mandatory 50 years ago. I wonder at the amount of neglect that is at present existing because of this slackness. Apart from the more mundane requests for the poultry to have access daily to food and water I was amazed there are farmers who have only nipple drinking facilities adapted to ducks. Some do not supply ducks with larger water facilities. Some ducks are unable to dip their heads under water to wet preen and clean their eyes and nostrils (have no access to surface water) The Regulation Impact Statement states this is from small minority of operatorsAN estimated 9.14 million ducks per annum is at risk from this problem. How tragic, many millions of ducks have passed their full life with their natural instincts ignored because some inhumane duck egg producer has economised on their welfare.

ABATTOIRS

The slaughter house...

We have seen videos of the loathsome episode at Star poultry Abattoirs when chickens/hens were scalded alive. Being the sceptic that I am about the egg industry's ulterior motives I see this as a means of achieving production and economic efficiencies over the welfare of the hens. Who designed these production lines with this flaw in the design! A safeguard (safety net) should have been **mandatory**. This should have been classified as a criminal offence with a heavy sentence. If this is happening in this abattoir then it is probably happening in some of the other 70+ abattoirs in Australia.

My son, Nicholas Maslen, a manufacturing Engineer. said the existing system may be the cheapest alternative but did not reflect any concern for the hen's welfare. He suggested upgrading facilities and changing the process to **satisfy production requirements and still fulfil humane requirements.**

1. The conveyers could be slowed down and an extra buffer could be put in place to guarantee the hen is dead before being put through the scalding area.
2. As a time factor 2 scalding areas could be put in for time lost.
3. Add an extra loop to conveyor or increase length of conveyor to give more time for ascertaining hen's death.
- 4 On the conveyor belt when hanging hens from their legs a humane supporting cradle could be designed to support the hens chest. They could be transported and held humanely during the process. We know that large numbers of hens have fractures from their life in cages and overfed chickens from weak bones. They also have fractures from transporting so the present system must be agonising for them. The abattoir footage revealed many feet break off.

**How brutal and barbaric does this system have to get, for change to happen.
Cheap, cost cutting designing my son said could be avoided.
Common sense initiatives when the hen's welfare is put first.**

RSPCA'S REQUEST TO PUT CAMERAS IN ALL SLAUGHTER HOUSES should be mandatory and put in place as soon as possible.

As I said in the beginning the integrity of the system is questionable.

With the Regulation impact Statement the ongoing issues are constantly comparing costs to welfare.... Examples follow:

1. **Option F would provide the greatest welfare benefit but would also be one of the most expensive options ...**
2. **the viability of implementing any suggested change.....**
3. **discuss the expected costs versus expected benefits....**
4. **costs of routine second beak trim etc**
- 5, **optimal lighting for wellbeing versus optimal lighting for productivity.**

Public Consultation question...

6 **do you believe that the net benefits to poultry welfare likely to be achieved with a 10 year or 20 year phase out of conventional cages under Option D are justified.**

7 **Would the costs and benefits of Option D be preferable to other options....**

Good welfare will come at a cost and the consumer will have to pay. The civilized world knows that battery cages are the cruellest system. Why are we having this discussion?

As I said **The egg industry is a quagmire.** Corruption/collusion in the governance of the system, imbalance of egg producers to animal welfare members in The S.A.G. We see the cage egg cruelty and lack of phase out dates, unsustainable numbers in so-called Free range, chicken leg crippling and breakages due to rapid weight gain, painful de-beaking (sometimes twice), maceration of chicks in rollers (a shocking egg industry invention), devious labelling of cage egg cartons, lack of proper labelling of free range and doubts about meaningful access to outdoors for free range, cruel and cheap inadequate design and appalling procedures in our abattoirs.

Adding to this, once our submissions and public signatures are registered the convoluted system continues. We still have AWTG, SAG, OBPR, AGSOC and AGMIN to follow with the final decision. There are committees ad nauseum. So possibly, any phase out date (if any) will not be decided until the end of the year. Then we may have the 10 or 20 year options date set.

Australia is not the lucky country it is the backward country.

I would like the following considered.

1 Overhaul & question the overloaded governance which has kept Cage eggs off the agenda.

2 Eliminate the conflict of interest in the system to get a more honest outcome and stop the corruption between the egg industry and government..

3. Separate welfare from production. Stakeholders' Advisory Group. to advise on implementing welfare based initiatives.

4 Phase out of the cage system in 3 years with egg producers being reimbursed and subsidized by government, to start Free Range systems. Norway took 5 years.

5 Make sure there is honesty in egg labelling with clearly visible ratios.

6 Make sure 'meaningful access to outdoors' means what it says that fowls go beyond the contrived popholes to pastures. Police these egg farms regularly.

7 Reassess all abattoirs to change the design fault existing at present and police frequently.

8 Install immediately the mandatory videos that R.S.P.C.A. advocates immediately in all abattoirs.

9 Lighting be extended to Norwegian standards.

10 DON'T allow enriched cages into the system.. such a backward step.

11. Consider using slower growing broiler genotypes in meat chickens.

12 implement the new embryo technology from Germany to stop the slaughter of day old male chicks as soon as possible.

The draft standards state that the new draft proposals are generally consistent with O.I.E. (World) standards. How does the cage system equate with the No. 4 principle...**"The physical environment should allow comfortable resting, safe and comfortable movement including normal postural changes, and the opportunity to perform types of natural behaviour that animals are motivated to perform"** I can't see any parallels with the Q.I.E principle and a caged hen, allocated the size of an A4 paper, with no room to flap its wings etc.

It is now time for our decision makers to show some leadership and to enact progressive legislative reforms that genuinely protect animal welfare. It will be their chance to redeem themselves in view of the past accusations and bring Australia up to world standard.
Basic decency and humanity demand that they take that chance

Meanwhile the ongoing tragedy is ... 11 million hens are suffering on wire at this moment. I weep for them.

Yours truly,

Val Maslen