

Proposed Australian Animal Welfare Standards and Guidelines (Poultry)

Submission to the Regulatory Impact Statement

26 February 2018

Dear Animal Health Australia

Background

My name is Brendan Bell, I am a proud 4th generation, 43-year-old cage and free-range egg farmer from Perth, Western Australia. I have been involved in the egg industry for over 30 years since my late father first encouraged me to learn about poultry at 10 years old.

Since those early days I have passionately applied my skills and knowledge toward understanding and excelling in every aspect of egg farming with a focus on excellence in stockmanship, understanding hen's behavioural traits and enabling animal welfare outcomes that are both sustainable and provide an invaluable food source that provides the income to support the job I love.

My decades of experience in egg farming (specialising in hen welfare) is extensive from managing breeder farms, rearing farms, hatcheries, cage layer farms, barn and free range farms. From this accumulation of skills and knowledge, I am qualified to make the statement that in my opinion the health, behaviour and animal welfare outcomes of hens farmed in cages are superior to the higher risk of alternate farming methods of egg production.

I write this submission in support of **Option C** and in response to incorrect statements levelled against the *Australian Animal Welfare Standards and Guidelines for Poultry* (that I believe in most part to be accurate) and to correct the misconceptions that have been made by the RSPCA, Animals Australia and other anti-cage farming entities who have made comments with incorrect information - most of whom would have never stepped foot on a modern, state-of-the-art cage facility.

Cage Farming Analysis

I am currently employed by *AAA Egg Company Pty Ltd* as the Operations Manager where I am responsible for the health and welfare of six egg production sites throughout Western Australia, where we farm over 1.3 million pullets and hens (including 675,000 cage hens) that receive the most sophisticated and advanced care from our highly trained staff and professional consultants including multiple veterinarians, nutritionists, livestock experts, feed supply experts, geneticists, genomic experts, chief veterinary officers of DPIRB and breeding company experts to name a few. I strongly believe that the care and environment we provide for both our cage and free-range hens exceeds the highest levels of animal care.

However, the one thing that causes great anxiety as a free range egg farmer is the risk of Avian Influenza and Newcastle disease amongst other diseases potentially devastating the population of both poultry and people directly from free ranging hens. In 2013, an avian influenza outbreak occurred in Australia of H7N9 strain in free range poultry that emerged to cause human deaths in China (<http://www.agriculture.gov.au/pests-diseases-weeds/animal/avian-influenza>)

We must use this information as a dire warning to retain cages to protect both hens and humans.

We only need to look internationally at China, Europe and the USA of the devastating effect both to agriculture and financially of avian influenza. Australia must remain vigilant and promote cage production – not ban this safe and humane method of production. The results of the national surveillance plan highlight the movement of wild and migratory birds carrying such catastrophic diseases that ultimately can infect both the human and bird population – this is not an adequate animal welfare outcome.

There is not an Avian Influence vaccine capable of protecting birds due to continuous mutating. This should serve as a warning to Australia to not ban cage production and seek methods of production protected from outside influences.

Animal welfare is and always will be the first and foremost duty in my role as Operations Manager. The management of animal welfare and animal behaviour is critical in producing quality eggs from content hens. References to various scientific studies suggests there is no measurable difference in hen behaviour and welfare of cage v alternative methods of production. Whilst further research is necessary focussing on the Australian experience (not international studies) it can be concluded that the significantly lower mortality rates, higher egg production rates and lower disease rates is a compelling argument to retain cage egg production in Australia. I strongly support the *Standards and Guidelines for Poultry* review becoming mandatory legislation nationally to further strengthen the requirements animal welfare outcomes of egg farmers.

Cage hen mortality from my experience is statistically significantly lower (due to frequent manure removal that also lower ammonia levels) than alternative systems due to the hens being separated from their own faeces (thus removing the oral / faecal cycle) and thereby removing bacterial, viral and parasitic challenges. It is no surprise why hens were placed in cages over 50 years ago – and that was to remove the unacceptably high-risk method of production free range (where hens are living in manure / dirt / introduced foreign pathogens from wild birds etc.). The facts are that hens are resilient and adaptable animals but being continually exposed to an unhygienic environment is not sustainable without health issues leading to mortality – this is a compelling argument to retain cage egg production.

Disease is a reality of all animals and if we seek to protect all animals including hens, why then would we expose them to poor conditions and environmental disease that will risk their life? As a cage and free range farmer I have a moral duty to protect my hens, how can I possibly protect a free range hen that is exposed to faeces, bacteria, viral and parasitic challenges that my cage hens are not? I feel immense sorrow for hens that are destined to “free range” as they are nearly three times more likely to die than a cage hen - this is a compelling argument to retain cage egg production.

Our cage hens experience a life worth living. They are free from predators such as foxes, eagles, cats and dogs to name a few. They exist with a purpose and opportunity to live and feel safe in environmentally friendly social groups of 5 to 7 hens that mimic the reality of their ancient existence. They are provided with conditions that support their health – not detract. Each hen can flap their wings or tippy toe around, sleep if they feel like it, play if they feel like it, feed, drink, lay eggs, socialise, rest and interact with human staff and are always treated to fine conditions amongst other things benefits not provided by free range systems ie. protection from sun, rain, heat and chill.

Animal welfare for me personally is quite simple, I wish to treat all animals well. Whether it be my family cat, dog, fish or even a pet sheep and this extends to my chosen career – in treating hens well.

The thought of not being able to farm hens in cages is a major quandary for all farmers, we know the unassailable benefits of cage farming but have a challenge to educate and convey this to the community and consumers – something that has been a challenge for many years. The density of hens is not scientifically proven to benefit hens – as the facts are hens with wide open spaces (free range) are more susceptible to mortality and disease than cage hens. And despite the wide open spaces, the vast majority of hens choose to spend time very close to the protection of the shed as their ancient predecessors have always displayed in darker areas where they feel safe.

Cage egg production in Australia is far from the horrific images frequently used by Animals Australia, RSPCA and other activists who choose to show non-conforming cages and breeds of chickens that are non-existent today and are from a bygone era. These images create an emotional response that does not reflect the high standards of the modern egg production facilities we use in Western Australia. The RSPCA and Animals Australia obsession with finding faults in cage production does not correspond with my experience with caged egg production.

The RIS (Regulatory Impact Statement) confirms and accurately outlines the substantial financial impost that any option other than **Option C** will place on the Western Australian egg industry and AAA Egg Company for no real gains in animal welfare outcomes. Any other option other than Option C will result in:

- Approximately \$50 million in additional costs to my employer AAA Egg Company to comply.
- Higher costs of production resulting in the higher cost of eggs to consumers;
- The loss of significant jobs across AAA Egg Company and Western Australia;
- The influx of eggs from the Eastern States into Western Australia;
- No measurable improvement in animal welfare outcomes;
- Increased loss of birds from being forced into higher risk alternate production methods.

Conclusion

In conclusion, from my experience, whilst no system of egg production is perfect, I strongly support the retention of cage egg hen production as the lowest risk system with acceptable animal welfare outcomes that support the production of affordable food without compromising on food safety.

The forces of supply and demand should ultimately dictate changes to the industry.

I therefore choose **Option C**.

Yours Sincerely



Mr Brendan J Bell