

PUBLIC CONSULTATION FOR AUSTRALIAN ANIMAL WELFARE GUIDELINES FOR POULTRY

Thank you for the opportunity to offer input for the Australian Animal Welfare Standards and Guidelines for Poultry. I think it is good that there is recognition of the need for improved welfare outcomes. National standards ought to streamline regulation; simplify processes for producers who operate in different States and Territories; and create a more level 'playing field'. I characterise my submission as a few comments relating mainly to layer hens, rather than as a thorough examination of the whole consultation. At times I have used quotes from various documents on the consultation's website, sometimes abbreviated, without referring back to the source – I do not think this has a major bearing on what I have to say.

While I appreciate that the drafting group has put in a substantial effort, I would say the feeling I got from some background documents was that traditional poultry industries would really like things to stay pretty much as they are: in particular, that cage systems for layer hens are still acceptable. The opening line of the paragraph directly below is an example of what I mean.

"The confinement of birds generally is fundamental for the operation of poultry enterprises . . .". This statement is not factual. Of course layer hens, for example, need to be broadly confined in some way but, factually, there are enterprises that DO rear them free of closely-confining cages for much of their daily routines. And documents on the website discuss non-cage systems in some detail. One immediately achievable thing that would help consumers choose what I would say are relatively more humanely managed layer hens is uniformly honest labelling of egg cartons.

This statement from background documents is not accurate: "Current market force (consumer choice) supported by clear labelling standards is promoting the production of barn and free range produced eggs. . .". Many eggs labelled as free range are clearly not free range, as an average person understands the term, and many egg producers do not include a stocking density on cartons. One older lot of eggs in our fridge at the moment is labelled free range, and the producer has at least had the courage to put the stocking density on the carton: 10,000 per hectare, or one hen per square metre. I believe no reasonable person would describe that stocking rate as anywhere near free range. A more recent lot of eggs in our fridge (and, obviously, our future choice until we find something more appealing) has a stated stocking density of 1,500 birds per hectare, which I would say is a very basic starting point for what an average person would judge as free range. If nothing else, this exercise has jogged us into changing our buying behaviour. The draft recommendation for a maximum of 1,500 birds per hectare for outdoor areas in free range systems is a great start.

"The drafting group . . . agreed that a maximum stocking density is required." Agreed; in any type of system it should not be a guideline, but a statutory standard. "The literature on the effects of space allowance in layer cages shows that in general as floor space decreases, within a range of 650 to 300 cm² per hen, bird welfare generally decreases, as measured by either higher mortality, lower egg production and body weight or poorer feed conversion (Widowski et al., 2016a). Dawkins and Hardie (1989) showed that group-housed hens require an average of approximately 475 cm² for standing, 540-1005 cm² for scratching, 771-1377 cm² for turning, 652-1118 cm² for wing stretching, 860-1980 cm² for wing flapping, 676-1604 cm² for feather ruffling and 814-1270 cm² for preening. These figures are above the current space allowances in legislation in Australia, being 550 cm² for an average layer in conventional caging." Then there's the European Union's 1 January 2002 "enriched cages", with minimum space per bird of 750 cm². I suggest that any of these examples of space allocations for caged birds – ranging from 300cm² to 1,980cm² - are confrontingly tiny. It seems to me that the examples given, and elsewhere in background material, are analogous to wondering about the number of angels able to stand on the point of a pin (almost literally), and they look to be trying to legitimise closely caged systems, where I would argue there is no legitimacy to be had.

It is hard to believe that we cannot reduce cannibalism and pecking in layer hens in a more humane way than by beak trimming. I am not creative enough, but somewhere among our planet's 7.6 billion inhabitants there must be someone who is. The statement "Every effort should be made to avoid beak trimming . . ." is close to a logical fallacy, I think - if every effort were made then beak trimming would be avoided. Let us simplify the Standard, remove the subjective "every effort", and ban debeaking. Similarly, there are several instances in the background documents where attention is drawn to difficulties in free range systems in managing pests and diseases, for example. Of course there are difficulties, but surely our bulging brains are capable of finding solutions.

There are several statements along the lines of:

"Nests

Based on evidence of a strong motivation to lay in a nest box prior to oviposition . . . there is convincing evidence of the importance of a suitable nest site. . . (Widowski et al., 2016b.). Nevertheless, the lack of a nest box . . . does not result in detrimental biological disruption based on the physiological stress response (Cronin et al., 2012)." Science can be found to support a wide range of opinion, and I suggest there is no scientific or other logic that says when there are options, such as in the abbreviated quote above, we should routinely revert to the less humane options.

I sense eye rolling. It might be suggested that my comments about hens are anthropomorphic, or simply tender hearted. I contend that current science can take us only so far when it comes to assessing mental states of pain and distress, for example. Also, I wonder how science is relevant to such subjective words as "reasonable" "humane" "acceptable" "adequate" "every effort", which are words used throughout the documents. I would say some of the science presented in the documents amounts to 'appeal to authority': a researcher or an industry, for example, sets up definitions of what constitutes distress (for example), and measures against them. But the setting of definitions and the measuring methods, no matter how many authorities are involved, are subjective processes; and no amount of formalised language makes up for these biases. I would say those processes are barely more objective than my looking at a hen and trying to put myself in its place – and I believe my approach is more candid! Again, I do not understand the scientific logic behind routinely choosing less humane options, as assessed by humans with a beating heart, when more humane options are available.

I have looked at the Regulatory Impact Statement and the list of questions, but prefer to focus my submission on my own document. I appreciate that an effort has been made to summarise costs and benefits. I cannot see boxes there that summarise my priorities well but if pressed to choose one issue it would be caged layer hens. The arguments for close caging are weather-beaten as seen from a 2018 perspective and I believe our society is looking for a rapid, major resetting towards only free range options. I encourage the panel to use this opportunity to reflect these modern perspectives in the final Standards and Guidelines. And while these words are fresh on the page I would rather see many more of the draft Guidelines turned into Standards.

Tom Beattie

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For context, I am nearly 65; I do not have a man-bun or wear baggy-arsed stretch pants or wear slip-on shoes; and I do not drink soy, blue, turmeric or any other kind of latte. I HAVE been known to drink craft beer.