

RIS PUBLIC CONSULTATION

26TH February 2018

Peter Bell

Dear Animal Health Australia,

I write in support of **Option C** as outlined in the Regulation Impact Statement (RIS). This document is further to my previous correspondence with my answers to the specific consultation questions related to the RIS, I would like to add some of my observations on the Standards & Guidelines process. Also, some background to my experience in the egg laying industry.

I come from a third-generation poultry farming background and have had long experience in many aspects of egg production, including management of layer breeder farms, chicken hatching, started pullet growing farms, egg production farms (cage, barn, free range).

I was brought up living on an egg production farm and have been employed full time for 54 years in the egg industry. During this time, I learnt all aspects of managing laying hens, starting with small groups of free range, transition into cages and more recently layers into new free range and barn systems.

I have an interest in bird welfare due to my experience as an egg farmer and over the last 20 years have been involved in many industry committees in this area. I have attended many seminars on welfare and have had meetings with welfare researchers providing practical knowledge on bird behaviour, industry management practices and practical solutions. Due to my knowledge of most aspects of the egg laying industry I was asked to be the representative of the industry on the Stakeholders' Advisory Group.

Missing from the debate on animal welfare of laying hens are the views of the stockpersons who have the experience and knowledge in managing laying hens in cages, in barn sheds and free-range systems. My submission aims to include some of these points to the public consultation process.

STANDARDS & GUIDELINES PROCESS

Recent comments from some stakeholders and some government quarters appears to be aimed at discrediting the process. From my perspective the management was robust and extensive and accorded all parties the opportunity to present.

The process in developing the current draft Standards & Guidelines was extensive and comprehensive and was spread over a 3-year period. The program was initiated and managed by governments through a series of levels with all states and territories involved the Animal Welfare Task Group and the Writing Group.

The official involvement of the Stakeholders Advisory Group commenced with the two forums which were held in Canberra in March and August 2016. I was appointed as the spokesperson for the national egg industry. Other stakeholders attending were from state and territory governments, Animals Australia, RSPCA, the broiler industry, other "poultry" species and researchers.

The Writing Group, under the Animal Welfare Task Group, prepared the draft S&G for discussion at the first forum which was debated by those present. Changes were made during the meeting and the representatives were invited to submit further information in writing. This process was repeated at the second forum held.

Opportunity was given for all those at the meetings to discuss the items in the draft and debate any of the points. From my point of view the discussion was robust and time given to debate the issues as they arose.

SUBSEQUENT DEBATE ON ANIMAL WELFARE RESEARCH

Post the Stakeholders' Advisory Group meetings there has been debate by welfare groups as to whether the Animal Welfare Task Group and the Writing Group had reviewed all the latest scientific literature? As part of this debate Agriculture Victoria commissioned the "Farmed Bird Welfare Science Review" by the School of Veterinary Science, University of Bristol. Whilst it is noted that the Review covers a large spectrum of latest research in poultry it has failed to bring full relevance to the Australian situation. My interest is in laying hens and I will make comments on some of the points from the Review and it represents the views as seen by researchers Vs those of an experienced stockperson:

1. 492 papers reviewed – 6.286% from Australia. 69.914% from Western Europe & North America. Important data from Australia was missed as was the recognition that management practices and systems in Australia are different.
2. This document was peer reviewed – 1 from Australia; 1 from NZ. The fact that the Australian situation was not recognised would suggest the reviewers were not cognisant of this.
3. The report states "*we have made our best 'expert' judgements in writing brief overviews of welfare considerations for each of the farmed bird species*". In the case of laying hens their "best 'expert' judgements" are flawed.
4. The review states that "*flock mortality rate provides critical information about bird welfare*". Other sections do not place the same emphasis on this factor and references behavioural activities as being more important.
5. Further it states that "*mortality rates in furnished cages are lower and more consistent than other housing systems*". This can also be said of conventional cages.
6. The review notes that "keel damage has the lowest prevalence in conventional cage systems".
7. The description of birds being "*pulled through cage fronts and carried by legs*" fails to note that since 2008 all conventional cages in Australia have full width opening doors. The statement that birds are "*carried by their legs in groups and placed rapidly into transport crates or modules situated at one end of the house*". This does not recognise the different ways that depopulation occurs e.g. using euthanasia where the bins are located in front of the cages.
8. The review has recognised that there are higher levels of bone fractures in non-cage systems. It is unclear why it later focusses on cage birds that have lower incidences?
9. There are large variances in figures quoted for bone damage in non-cage systems but records they are higher than in cages. The report recognises the multi-factorial differences in bird strain and limestone access. Australia has many "stepped tiered" systems which is not recognised in the report.
10. The review states "*birds reared in cages have a reported mortality of approximately 7% by 16 weeks of age*". Clearly this is not Australian data where normal mortality is less than 2% to 16 weeks of age. Further, the review quotes "*one Mexican study found that floor-reared white birds had lower mortality than cage-reared birds*". This is not the experience in Australia.

11. The review states *"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 dust-bathe"*. This is incorrect in many aspects as birds can move around the cage from front to back and side to side. Observations of activities in a cage clearly shows the birds moving constantly. Also, if birds were as inactive as suggested then they would not be in such good health nor produce at the high rates of lay.
12. The review states *"hens are effectively prevented from performing even simple locomotor and comfort movements"* in cages infers that birds cannot move in a cage. This is not the case and is clearly not true as they would die from atrophy or at least not produce many eggs and be as healthy as they are reported to be.
13. The review recognises that laying hens in non-cage are subject to higher rates of illness and higher levels of mortalities due to disease, injurious pecking, and predation.
14. The review gives many density figures for cages but does not provide conclusive evidence as to the welfare benefits of changing from 550 cm² per bird.
15. The review states that in non-cage a change of density from 12 birds/m² to 9 birds/m² does not bring welfare advantages.

SUMMARY

1. CAGE EGG PRODUCTION
 - a. Whilst it is recognised that cage layers do not have the ability to express all their natural behaviours to the full extent they do experience the benefits such as lower mortality, better health, less stress, and less bone fractures. Cage systems also provide benefits in the areas of food safety, lower carbon footprint, OHS benefits.
2. CAGE DENSITY
 - a. The research evidence is not definitive that a change from 550 cm²/bird to 650 cm²/bird would improve welfare. There are significant costs to changing the density in cages. The bird capacity would need to be replaced in new facilities be they cage, barn or free range.
3. BANNING OF CAGES
 - a. The banning of cages, even with a phase out period will be a large impost on the egg industry. If government/s choose this path, then they should look for a funding mechanism to achieve their outcome.
4. FURNISHED CAGES
 - a. These are not practical to install. It would be large cost to industry, and the retailers, RSPCA and Animals Australia have publicly stated they do not support them.
5. NON-CAGE DENSITY
 - a. The University of Bristol review has stated that there is no welfare benefit in changing from 12 birds/m² to 9 birds/m².
6. GENETICS
 - a. Genetic selection over the last 50 years (and particularly in the last 10 years) has modified layer hen behaviour:
 - i. Broodiness – The maternal instinct to go "broody" has greatly reduced over the last 30 years due to the selection for higher levels of egg production.
 - ii. Foraging behaviour – Recent studies have shown that breeds that have not had genetic selection applied express foraging behaviour 4 times that of the newer genetics.
 - iii. Adaption to cages – Selection over a period of 50 years has produced commercial birds which as part of the selection process have adapted to cages.