

Dear Animal Health Australia

I grew up on my parents Commercial Egg Farm, a cage farming system in the metropolitan area of Perth WA.

My family had very good door sales for eggs and consigned the rest to Golden Egg Farms. Following deregulation and because of ageing facilities the farm was closed and we went into a joint venture farming operation. This established a new caged commercial facility on the city fringe.

Dad was the president of The Commercial Egg Producers Association for 13 years until he died in 2015.

My experience with our own farm, collecting and selling eggs was very positive and I have a great admiration for the way my parents cared for and respected animals. Other egg producers that I have met over the years promote animal welfare as important and equal to seeking a profit.

I have answered the questions below in format of the RIS Public Consultation Questions.

I am in favour of retaining Cage layer systems and support them as best animal welfare practice, as specified by the Proposed Australian Animal Welfare Standards and Guidelines – Poultry.

People have and give opinions on Cage systems yet few have actually visited that type of farming because of biosecurity, necessary to maintain animal welfare.

Avoid emotive arguments from RSPCA and Animals Australia groups depicting commercial cage egg farming as cruel or irresponsible. The Australian Animal Welfare Standards and Guidelines – Poultry, Consultation Regulatory Impact Statement has clearly listed the advantages of Cage systems.

**My response to RIS Public Consultation Questions:**

RIS Location – 2.3.1 Risks to animal welfare.

**1. Do you agree with the summary list of advantages and disadvantage of layer hen farming systems in Part 2.3.1 ?**

YES

Comments:

I have lived on a Cage facility egg farm and can assure you the advantages listed in the RIS Proposed Australian Animal welfare standards and guidelines page 34,35 exceed other egg farming methods.

**Do you think that any advantages and disadvantages are missing from this list? If so, please include them below.**

YES

Comments:

Eggshell contamination from bird faeces in systems other than cage enables a greater possibility of Salmonella infections in humans.

Chicken faeces collected easily from cage systems is an effective and sought after manure for market gardeners.

**2. Do you think the risks to the welfare of poultry discussed in Part 2.3.1 are sufficient to justify the introduction of better standards and / or guidelines?**

No

Comments:

A consistent national standard of animal welfare is a step forward and should provide an effective basis for prosecution, should standards not be maintained.

**3. Which of the above-mentioned areas of risk to poultry welfare do you think are the greatest concern?**

Comments:

Higher hen mortality rates from farming systems other than Cage.

Infectious disease concerns with egg production systems other than cage systems. Not only relative to hens but also humans. (refer Avian Influenza and Salmonella enteritis).

**Are there any other areas of concern to poultry welfare? Please provide reasons for your answers, together with supporting scientific evidence.**

Comments:

Free Range Farming increases the risk to animal welfare from exposure to wild birds and infectious diseases such as Avian Influenza.

This virus can cause severe and fatal infections in humans. To prevent an outbreak of bird flu, keep wild birds and domesticated birds apart and ensure domesticated birds have a safe supply of drinking water. A procedure already covered by cage egg production.

**4. In your experience, to what extent do the existing Model Codes of Practice (MCOP's) and related regulations create uncertainty for Industry?**

Comments:

I am aware of farmers in Western Australia who are still paying for their upgrade of cage systems undertaken in that past 10 – 15 years. If option D is accepted by the RIS it will cause substantial and possibly devastating hardship for these farmers.

Furnished Cages systems as an option to regular Cage systems is very likely to receive the same discrimination to product as being suggested Section A3.3.1 Appendix 3 to this RIS. It can still be classed as a cage system.

**8. Do you think there needs to national consistency in animal welfare standards for poultry? Please provide reasons for your answer.**

YES

Comment:

It would appear sensible to have a national code of practice to protect animal welfare.

**9. Do you think that the net benefits to poultry welfare likely to achieved under Option B, are justified?**

NO

Comment:

This reads as a band aide solution as no legal position will change without regulatory consensus. Constant reviews at 5 yearly will not encourage egg industry investment. (RIS Consultation page 53)

**Would the combination of costs and benefits under Option B be preferable to other options?**

NO

Comment:

No -unable to enforce Option B it will be ineffective.

**Would the combination of costs and benefits under Option B be preferable to other options?**

Option A obviously cheaper however, Option B has no enforceable benefits.

**10. Do you think that the proposed national standards under Option C reflect community values and expectations regarding the acceptable treatment of poultry?**

Undecided

Comments:

Very few people in the community understand the animal welfare discussions. Information put forward in media from RSPCA and animal activist groups project a very distorted view of poultry treatment. I believe national standards as per Option C are the correct way forward with animal welfare.

**11. Do you believe that the net benefits to Poultry welfare likely to be achieved under Option C, are justified?**

YES

Comments:

Yes, it is important to have national guidelines to ensure animal welfare standards.

**Would the combination of costs and benefits under Option C be preferable to other options?**

YES

Comments:

This is the best option proposed by the RIS. Animal activist groups may not agree however many of their supporters are coerced by misleading media reports. It is important to understand cage production systems and this is difficult without actually visiting a cage facility. (unlikely to be achieved due to biosecurity)

**12. Do you believe that the net benefits to poultry welfare likely to be achieved with a 10 and 20-year phase out of conventional cages under Option D, are justified?**

NO

Comments:

Option D does not benefit animal welfare.

(Pages 34 to 38 Consultation RIS). Australian Cage systems are advantageous to animal welfare as demonstrated by mortality and production rate comparisons against other systems.

**Would the combination of costs and benefits under variations of Option D be preferable to other options, either as a stand-alone option or in combination with other options?**

NO

Comments:

Not viable for all farmers presently operating cage hen facilities. Many small farmers would cease to operate and large farmers would lose financially should this be implemented. Option D will remove the choice for consumers and force production costs to rise. This could then flow on with increased retail egg prices.

**13. Do you believe that the net benefits to poultry welfare likely to be achieved under Option E, are justified?**

Undecided

Comments:

To reduce stocking density from existing cages by for example removing 1 bird from each cage will cost farmers money with infrastructure improvements and loss in productivity. I do not believe animal activists or the RSPCA will settle for purely stocking density adjustments for cage egg producers.

**Would the combination of costs and benefits under Option E be preferable to other options, either as a stand-alone option or in combination with other options?**

No

Comments:

I do not see Option E as being acceptable long term with RSPCA & Welfare Groups.

**14. Do you believe that the net benefits to poultry welfare likely to be achieved under Option F, are justified?**

No

Comments:

This option equates to adopting Option D. Refer previous comments. I do not believe welfare groups will settle for this option long term and costs involved make it a superfluous option.

**Would the combination of costs and benefits under Option F be preferable to other options, either as a stand-alone or in combination with other options?**

No

Comments:

Converting to furnished cages would cost considerable money for current cage egg producers. Animal welfare benefits can be debated however, how long before RSPCA and animal welfare groups deem furnished cages to be unacceptable and issues arise to ban furnished cages?

No security for existing cage commercial egg farmers.

**15. Do you believe that the net benefits to poultry welfare likely to be achieved under Option G, are justified?**

No

Comments:

Covered "Proposed Australian Animal Welfare Standards and Guidelines".

**Would the combination of costs and benefits under Option G be preferable to other options, either as a stand-alone option or in combination with other options?**

No

Comments:

Circumstances can vary at each commercial farm regarding lighting and the farm situation. Leave this decision to hatcheries and farmers to determine benefits.

**16. Which of the Option A, B, C or combination of one or more Options D, E, F, or G in your opinion would provide the greatest net benefit for the Australian community?**

Comments:

**Option C**

**17. Do you have any further information or data would assist in the assessment of the impacts (costs and benefits) expected under each of the options/variations?**

Comments:

Option D would be a devastating outcome for existing cage egg producers.

I am concerned to retain a choice whether I purchase cage produced eggs or eggs from an alternative system.

I see the cage eggs as cleaner and less likely to be contaminated. Also, produced at a lesser cost enabling reduced prices to be passed onto consumers.

**18. Do you think that any of the Option A to G are likely to have disproportionate impact on small business compared to medium and large business?**

Yes

Comments:

Very disproportionate impact will be made to all egg producers operating a cage system no matter what size business.

The RIS does not tell us how impacted business will be compensated or expected to fund costs. Particular problems with Option D.

**Do you think that any of these options are likely to have a greater impact on small business than other options? Please provide reasons for your answers together with available supporting evidence.**

Comments:

Concern for all cage egg producers because of the financial impact should Option D be implemented.

## **OTHER COMMENTS OR SUGGESTIONS**

**Please include any comments or suggestions that you'd like to share.**

Establish a standard guideline as per option C. without 5 yearly reviews.

I remember the Egg industry being deregulated during 1990's. Some compensation was received by Producers for loss of egg licences. A free market to sell eggs was then established.

With most industries a free market will enable proprietors, in this case the egg farmers to determine their own production methods. Do not regulate as per option D to appease a minority of consumers with limited real knowledge of the egg industry. RIS Page 29 2.2 which states "if rational and informed producers can save themselves money by improving welfare, then they will do it without being forced too by regulated standards". This statement could also read "if rational and informed producers can save themselves money by discarding cage facilities they probably would without enforced regulation".

There is still a healthy market in Australia for cage egg production. Proposed Australian Animal Welfare Standards and Guidelines – Poultry has established a fairly comprehensive list of pros and cons for each egg production system. Refer page 34 – 38 you will see cage eggs systems tick the boxes for animal welfare, particularly with lower mortality a significant factor. Avoid pathogenic bacteria from egg shell faecal contamination prevalent in non-cage systems (Salmonella)

I strongly recommend acceptance of Option C.

**RIS PUBLIC CONSULTATION QUESTIONS**

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