

Submission to Poultry Public Consultation

Key Points

Mortalities

If cages are banned the mortality levels will go from 3% in cages to 8% in alternate systems under Australian conditions. This is 540,000 hens per year or one extra hen per minute that will die if cages are banned

A new welfare standard the kills and extra 540,000 hens per year can not be seen in any way to improve the welfare of poultry in Australia.

Furnished Cages

Whilst furnished cages are a theoretical option, furnished cages are not a practical option in Australia. To invest large amounts of capital to make no increase in returns to fund the investment is in no way a practical option. With groups like RSPCA running their “a cage is a cage” campaign, poultry producers are highly unlikely to invest in this segment of the market as it would be high risk with little prospect of any viable returns.

Public Perception

As has been made public a number of people have made submissions for cages to be banned. These submissions must be view in context.



Chickens in cages at a conventional production commercial egg farm; Hampstead, Maryland, United States of America

Groups such as Animals Australia have used imagery that completely misrepresents that current standards with in the Australian industry. This image was used to engage people to click through and sign petitions. The image is of American hens and the image has been photoshopped to look like and Australia cage by removing the cage door handles.

The original image can be found at <http://www.gettyimages.com.au/detail/photo/chickens-in-cages-at-a-conventional-high-res-stock-photography/596280610>

The cages in this photo have been illegal in Australia since 2008. American standards also allow for much higher stocking densities than Australia.



RSPCA has also used imagery of old illegal cages in its public presentations (Source Twitter)

RSPCA also uses imagery of old illegal cages in its social media campaigns (<https://www.facebook.com/RSPCAAustralia/videos/10155586435227984/>).



Given the large volume of misleading information presented to the public, submissions to the review process to ban cages must be viewed with caution and questioned if they represent an informed view on the issues to be considered.

The survey claims of activist groups in regard to the community's desire to ban battery cages is in no way reflected in peoples' buying habits. These surveys typically elicit a response that people think they should give rather than what people actually think. These survey results are also significantly different from those of veterinarians and industry professionals who would be considered more informed on the issues to be considered.

Commercial Free-Range Welfare

There is an assumption the free-range represents higher welfare outcome and we should do what is done in Europe. These views are not supported by key authors in the literature.

Bristol University combined welfare measures (mortality, injurious pecking and bone fractures), and summarised the situations for the average free-range hen. (Free range v cage: Science behind the headlines. Nicol, Christine Poultry World; Dec 2013; 168, 12; ProQuest Pg. 32)

- *By the end of lay, 10% will have died. Of the survivors, 42% will experience both a fracture and a significant number of severe pecks, 22% a fracture and 20% severe pecks only. **Only 12% of surviving birds will be unharmed.***
- *The most generous view might be that there is a significant welfare impact for only half the birds affected. Perhaps the other half meet painless deaths, recover quickly from a very small fracture or experience one of these events just hours before depopulation. But even with this interpretation of the figures, more than half of free-range hens experience a significant welfare insult.*
- *Perhaps this is only to be expected? After all, death is part of life, and accidents do happen. We need to benchmark what we could reasonably expect.*
 - *Take mortality - at the end of lay a hen is 20% through her potential lifespan of eight years. Comparisons with other species (including humans), suggest that mortality at this stage of life should not exceed 2% if good preventive health measures are in place. More realistically, perhaps, the targets published by most breed companies suggest that mortality should not exceed 4%, a figure that is often achieved in cages.*
 - ***Free - range hens are therefore dying routinely at rates that are two or three times higher than they should be, and on some farms at rates that are more than eight times greater.***

Elson in 2015 also raised concerns that free range may not deliver a suitable welfare outcome for hens.

Although outdoor access for hens is perceived by some to offer improved quality of life, these risks of high mortality indicate significant negative effects on hen welfare. The European Food Safety Authority (2005) scientific opinion noted various hazards and made several welfare recommendations. Recommendation 13 was: 'Efforts should be made to minimise mortality and morbidity, including the use of benchmarking and other incentives, in order to reduce the risk of poor welfare. Only those systems, in which there is expected to be low mortality,

should be used'. It is difficult to see how FR in its present form can consistently meet this recommendation (Elson, 2008). (Elson, H.A., 2015. Poultry welfare in intensive and extensive production systems. World's Poultry Science Journal, 71(3), pp.449-460.)

Banning cages and forcing farmers to kill large numbers of hens and place them in systems which hen welfare is already questioned is not a desirable outcome of a Standards and Guidelines Process.

Consumers have a Choice

There is a wide variety of eggs available in the marketplace. Consumers are able to choose eggs that meet their expectations. Those consumers who dislike cage egg production have many purchasing options available to them. Products are labelled with the production system and consumers can buy according to their preferences.