

RIS PUBLIC CONSULTATION QUESTIONS

Date: 4 January 2018

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Dear Animal Health Australia

Both of my parents were born in Western Australia. My father was raised on an orchard, egg farm. The property sold when his father died. When I was a child we always had approx. 8 hens in our quarter acre backyard. From this background I have retain a love and respect for poultry.

When my husband and I decided to leave our bank employment. We purchased a commercial egg farm and 2 years later a second commercial egg farm, both cage facilities.

As a consequence of deregulation, aging facilities and residential encroachment we joined with other commercial egg producers to create AAA Egg Farms. Our old farms were sold for housing development. My husband was and remained President of The Commercial Egg Producers Association of WA Inc for 13 years until he died, late 2015.

I have recently nominated and become a committee member of The Commercial Egg Producers Association of WA Inc. My income is reliant upon my investment in egg production.

Animal welfare has always been important to me both as a farmer seeking profitability but also because I respect and care for animals.

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 for animal welfare as specified in the code of practice.

Many people voice opinions on Cage systems however, very few have ever visited that type of farming because of biosecurity which is necessary to maintain animal welfare. Care needs to be taken to avoid emotive arguments put forward by RSPCA and Animals Australia groups depicting commercial egg farming as cruel or irresponsible.

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:

Cage farming system out shines all other systems with advantages listed.

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

YES

Comments:

Cage Layer System advantage:

Safe guards against disease occurrence is listed however, should specify the minimal risk of exposure to wild birds and infection from Avian Influenza. Minimal eggshell contamination from bird faeces assuring less possibility of Salmonella infections in humans.

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:

Discarding Cage Systems is a giant step back in time to approximately 1960. If I was a laying hen in Australia I would prefer a temperature-controlled environment rather than scratching in hot dirt at 40 degrees Celsius. Trying to find shade and treading in manure. Or sloshing around in muddy sand during winter, facing a cold breeze.

References to expression of Innate behaviours such as dust bathing, ground-scratching and wing-stretching are obvious criticisms directed at Cage farming systems. With genetically bred laying stock over the past 300 years how interested are modern chicken breeds in participating in these behaviours?

Other egg farming systems have considerably more disadvantages listed. Animal welfare being amongst them with pecking, crowding, exposure to environment and predators.

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

Comments:

High mortality rates from farming systems other than Cage. Infectious disease concerns with egg production systems other than cage systems.

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.

It should be mentioned that Avian influenza viruses can also cause severe and fatal infections in humans. Almost all human cases have had direct or indirect exposure to infected poultry or contaminated environments.

The World Health Organization is worried that an avian influenza virus and a human influenza virus might mix and result in a new strain of influenza virus that can be easily passed from person to person. This might trigger an “influenza pandemic”, where the disease spreads rapidly around the world, infecting many people.

The U.S. 2014 has seen highly pathogenic cases of H5N8 and H5N2 strains in domestic poultry. Those strains as well as a H5N1 strain have been discovered in wild birds. According to the USDA, the H5N8 virus started in Asia and spread among wild bird migratory pathways in 2014, mixing with other bird flu strains in North America, now resulting in what the USDA calls new “mixed origin” viruses. The H5N1 seen in North America is not the same virus that has been seen in Asia, Europe and Africa, which has caused human infections.

According to the USDA, these viruses are connected and since mid-December 2014, there have been several ongoing highly pathogenic avian influenza

incidents along the Pacific, Central and Mississippi Flyways (routes used by migrating birds).

Avian influenza and risks to Australia

It is not uncommon for wild birds in Australia or migratory birds coming to Australia to carry low pathogenic avian influenza (LPAI).

Australia has previously had outbreaks of avian influenza in commercial poultry – all of which were successfully eradicated. These outbreaks were not caused by the strains that have recently emerged and are currently causing concern in the United States and Asia.

While the likelihood of these overseas H5 HPAI viruses entering and becoming established in Australia is low, it is a reminder that all poultry producers need good biosecurity measures in place to prevent avian influenza, and other endemic diseases, in their birds.

Global Avian Influenza Outbreak Situation Update

The Department of Agriculture and Water Resources is aware of the multiple outbreaks worldwide of H5 related highly pathogenic avian influenza (HPAI) viruses in poultry. These outbreaks have resulted from a new H5N8 strain of the virus that emerged in poultry and many wild bird species in Asia in 2014. They include:

- H5N1 in China and Vietnam
- H5N2 in North America and Taiwan
- H5N6 in China, Laos and Vietnam
- H5N8 in China, Europe, Japan, North America, South Korea and Taiwan.

Although these viruses are not known to easily cause disease in humans, a small number of people infected with H5N6 have been reported in China since late 2014.

The multiple H5N2 and H5N8 HPAI outbreaks in commercial and backyard poultry flocks worldwide have serious socioeconomic and animal health impacts. The current outbreak in the United States alone has been confirmed in more than 46 million birds with HPAI.

Danger to Human Health and Cost to the Australian Health Care System

Health experts are concerned that the current bird flu affecting parts of Asia, the Middle East, Africa and Europe could become a worldwide pandemic if the virus does mutate.

The worst influenza pandemic in modern history was the Spanish flu, which occurred in 1918–19 and killed up to 50 million people.

Key measures to prevent an outbreak of bird flu include keeping wild birds and domesticated birds apart, making sure that domesticated birds have a safe supply of drinking water.

A vaccine against bird flu is in development, but not currently available.

Whilst we are discussing Poultry welfare it is still prudent to consider any flow on effects to humans.

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

Comments:

As mentioned Furnished Cages systems as an option to regular Cage systems may receive the same discrimination to product as being suggested Section A3.3.1 Appendix 3 to this RIS.

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

YES

Comment:

Australian Poultry Industry is not large and therefore it would seem preferable to monitor its effectiveness on a National basis, cutting out unnecessary governance costs. This question should be reviewed when better statistics are available from business operating across state borders and their opinions.

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

NO

Comment:

Providing guidelines with no regulatory assessment, continual review and amendment, appears unnecessary and expensive. Too much is “depend on degree of adherence”.

Suggestion of a 5-yearly review (Page 53 Consultation RIS) gives no stability to invest in the Egg industry.

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

NO

Comment:

This appears to be a token guideline being expensively reviewed every 5 years without any real enforceable effect.

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

Costs listed are obviously less than other proposals except Option A. Benefits appear minimal.

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:

Community values can be coerced with misinformation spread by Animal Welfare groups and the RSPCA? How many people in the Australian community have an opportunity to visit a Cage Egg system (biosecurity issues) or alternate Egg production systems to enable an informed decision on Animal Welfare?

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

YES

Comments:

Although I have limited knowledge of welfare variances across state borders.

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

YES

Comments:

As the RIS does not have the capacity to cancel State or Territory standards how effective can Option C be if introduced? The RIS may need to influence and educate animal welfare lobby groups regarding the research and benefits to animal welfare inherent with this Option.

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:

I see no benefit to poultry welfare in adopting Option D.

As per lists of advantages/ disadvantages noted (Pages 34 to 38 Consultation RIS). Poultry welfare is well served with modern cage systems as operating in Australia.

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:

Option D is not considered viable for any current commercial Egg Producer operating a Cage system.

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

Undecided

Comments:

No experience in stocking densities with barns or sheds for non-cage layer hens or meat chickens.

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:

Will these amendments be acceptable to RSPCA & Welfare Groups and if yes, for how long?

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:

As stated this gives no assurance to Producers for any long-term acceptance from RSPCA or Animal welfare groups who are endeavouring to implement Option D.

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

No

Comments:

RIS recommendations cover humane requirements in these areas. Circumstances can dictate need for different actions as discussed under Option G. Matters should be left as stated in the "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:

Hatchery and Egg Producers to determine necessity for these standards as per their individual circumstances.

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: 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:

Further consideration be given to Human welfare issues, some of which have been mentioned in the RIS.

- Avian Influenza
- Costs being acknowledged in the RIS to producers regardless of options other than A.
- No compensation suggested for Egg Producers who may be required to spend substantial money relative to these options.
- Continual scrutiny of egg production systems giving no stability for Egg Farmers future livelihoods.
- Innuendo that furnished cage systems may not be acceptable in future reviews.

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:

Option D will have a huge impact for all Egg Producers operating a Cage production system regardless of their size. Substantial cost analysis has been included with RIS report however does not provide suggestions as to how these costs will be met. The need to have larger flock sizes to achieve current production levels – also no suggestions of financial compensation.

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:

Option D will have a devastating financial effect on small business operating a Cage System.

OTHER COMMENTS OR SUGGESTIONS

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

Establish a standard guideline as per option C. However, continual 5 yearly reviews will restrict confidence for Egg Producers to move forward and invest in the industry.

In 1927 the Egg Industry was regulated, egg production and farms checked by Government officials to ensure correct systems, bird numbers and animal welfare. Producers received set egg prices in a Government controlled regulatory system. Farmers were not allowed to sell eggs without agreement by the Government Egg Marketing Board.

During 1990's the industry was deregulation and some compensation paid to Producers for their loss of egg licences. Farmers could then operate a free market.

Now nearly 30 years after deregulated the RIS appear to be recommending a regulated system without the Government involvement.

In a deregulated industry it would seem prudent to allow the Industry participants to determine their own production needs relative to Marketing. Producers can adapt to sales trends as needed. Regulating as per Option D, I consider unnecessary.

As referenced on page 143 Consultation RIS, recent discounting of eggs is reducing prices paid to Egg Farmers with a resulting loss of income. It is unclear in the current climate how farmers could consider changing existing infrastructure or being committed to a time frame. Refer to 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 same statement can be applied to Option D.

Supermarkets are presently reducing retail margins with eggs selling at less than \$1 per dozen across most states in Australia. This is not a sustainable situation. Cost of producing eggs is approximately 95 cents per dozen plus packaging and transport. There is no margin here to change production systems.

Do not lose sight of the market share cage eggs still hold in Australia (ref: page 141 of Consultation RIS), be aware of lobby groups campaigning against cages to meet their own agenda. Not all members are fully informed of Cage production systems and the advantages listed. (ref: Page 34 of Consultation RIS).

Note health issues associated with Avian Influenza A Virus infections in Humans. Also, contamination by pathogenic bacteria, such as Salmonella enteritis. Larger numbers of egg shell are contacted by faecal matter in systems alternate to Cage systems.

Beware of the costs should Avian Influenza mutate from wild birds affecting Free Range Egg Farms to humans. On average in Australia 3,500 deaths, 18,000 hospitalisations and 300,000 GP consultations occur each year from flu. This is not related to Avian Influenza; however, is an indication of the scope our medical profession would be affected by additional human bird flu viruses. Transition of virus can be in the air or dust and someone breaths it in. Or touch something that has the virus on it, then their eyes, mouth or nose.

Refer to the statistics on hens destroyed in USA 2014 from Avian Influenza - some 50 Million chickens & turkeys were destroyed. This presents a strong animal welfare argument in favour of cage egg production systems and biosecurity.

A further look at systems alternative to cage systems highlight egg shell contacted by faecal matter. The danger of contamination by pathogenic bacteria, such as Salmonella enteritis is increased.

Salmonella can affect anyone with the greatest risk of food poisoning children under two 2 years, pregnant women, people over 70 or with lower immune system functions.

I have highlighted two issues that can affect not only animal welfare but also human welfare that are prevalent in systems alternate to Cage systems. These issues have the potential to cost the Australian Health Department substantial money and should be kept in mind with any thoughts to implement Option D.

For animal welfare and the community, I strongly recommend acceptance of Option C.

Congratulations to the Consultation RIS for the work entailed in this study.