

RIS PUBLIC CONSULTATION QUESTIONS

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RIS location - 2.3.1 Risks to animal welfare

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

No Yes Comments: The provision of the freedom to express “innate behaviours” is not a disadvantage in cage systems. The requirement to express innate behaviours is to forage for food and prevent infestation of parasitic insects such as lice. In cage systems, birds are provided a constant supply of feed and water and the birds are protected from parasites. Free Range and Barn birds are just as prone to bone fractures as cage birds (in fact, in our experience, more so). Cage sheds actually have a lower stocking density per cubic meter (as opposed to floor area square meters) than a typical non cage shed, so the argument that disease spreads faster is not valid

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

No Yes Comments: Cages are better for worker (human) welfare. There is less dust and noise, less bending and climbing and the lower mortality rates means less stress for farm workers

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 Yes Comments: Ensuring Standards are legally enforceable will provide for improved welfare outcomes

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

Comments: The industry has moved into non cage, particularly free range, systems faster than issues like disease, smothers, feather pecking and cannibalism can be researched and effective solutions found.

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

Comments: No

RIS location - 2.4.1 Lack of clarity in standards

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

Comments: The existing MCOP is not legally enforceable so there is no clarity on what must be done to ensure optimum welfare outcomes

Does such uncertainty vary between different states and territories?

Comments: While state and territory governments are responsible for the implementation of standards, there will always be uncertainty. A classic example of this is the introduction of egg stamping where every state adopted a different approach

5. In your experience, how does this type of uncertainty for industry adversely affect productivity? If possible, please provide some case examples. .

Comments: The egg market is a national market; it is essential that a uniform approach to production standards is adopted to ensure a level playing field

RIS location - 2.4.2 Excess regulatory burden

6. Are you aware of any other poultry farming businesses in addition to those given in Part 2.4.2 that operate in more than one state or territory? If so, please list.

No Yes Comments:

7. In your experience, what is the effect of cross-jurisdictional inconsistencies on industry (i.e. even where jurisdictional standards are clear and verifiable)? If possible, please provide some case examples of where additional costs have been imposed on industry as a result of such inconsistencies.

Comments: New South Wales was very slow to enforce the increase in cage stocking density to 550cm per bird. This meant that some producers avoided the requirement to invest in new equipment, giving them a cost of production advantage. ACT banned the production of cage eggs, but cage eggs are still sold in the that Territory

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

No Yes Comments: It is essential that all Australian all layer hens are afforded appropriate welfare standards. It is also essential that, because the egg market is National, no state or territory has an advantage which might provide for lower production costs over and above those costs which are different because of geographical location

RIS location - 4.2.4 Option B: (non-regulatory option – voluntary national guidelines)

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

- No Yes Comments: [Enforcing standards is preferable; Option B is essentially maintaining the status quo](#)

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

- No Yes Comments: [Without effective enforcement, the it is less likely the standards might be adopted by farmers, particularly amateur “pastured free range” producers](#)

RIS location - 4.2.5 Option C: (the proposed national standards as drafted)

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

- No Yes Comments: [50% of consumers buy cage eggs. 90% of the food service industry buy cage eggs. More than half the population are comfortable with buying cage eggs. People who have visited our cage sheds have indicated a high level of satisfaction with what they observe. Cage eggs are cheaper than non-cage \(barn and free range\) eggs. Eggs are an essential protein based staple food and it is essential the price point remains where eggs are accessible by as much of the population as possible.](#)

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

- No Yes Comments: [Option C provides for improved, enforceable standards for all production systems and maintains the supply of cheaper high quality eggs from cage systems, essential to ensure all Australian consumers have access to this staple protein product](#)

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

- No Yes Comments: [The other options don’t provide for the same level of enforcement and would undoubtedly provide for worse welfare outcomes.](#)

RIS location - 4.2.6 Option D: (vary the proposed standards [Option C] to include phasing out conventional cages for layer hens)

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 Yes Comments: [The banning of cages is not in the interests of the community due to the loss of lower priced eggs for working families and the impost on cage egg farmers, who simply could not afford the cost of establishing alternative systems. The ultimate outcome would be a chronic shortage of eggs, and the possibility of imports to fill the gap. Upstream contributors to the industry would also be affected, particularly grain farmers in regional areas who rely on a viable egg industry to support their farming enterprises. Furnished or enriched cages are still cages, unlikely to be acceptable to the activist organisations such as RSPCA and Animals 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 Yes Comments: [For reasons already stated](#)

RIS location - 4.2.7 Option E (vary the proposed standards [Option C] to reduce maximum stocking densities in barns or sheds for layer hens and meat chickens)

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

No Yes Comments: [The stocking densities for layer hens under Option C are those currently typically adopted by industry. Simply, they work! Farmers work closely with their livestock and are in a much better position to evaluate stocking densities of their valuable livestock than those who are unlikely to have ever set foot on a poultry layer farm. Stocking densities which are too low can lead to lower shed temperatures, particularly in cooler climate areas, which can cause the birds to “huddle”, increasing the risk of smothering](#)

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 Yes Comments: [For reasons already stated](#)

RIS location - 4.2.8 Option F (vary the proposed standards [Option C] to require the availability of nests, perches and litter for all chicken layers in cage and non-cage systems)

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

No Yes Comments: [Nests, perches and litter in cages are essentially furnished or enriched cages, which are still cages, unlikely to be acceptable to the activist organisations such as RSPCA and Animals Australia](#)

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 Yes Comments: [For reasons already stated](#)

RIS location - 4.2.9 Option G (vary the proposed standards [option C] to ban castration, pinioning and devoicing, hot blade beak trimming at hatcheries, and routine second beak trim)

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

No Yes Comments: [Smaller hatcheries cannot afford infrared equipment.](#)

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 Yes Comments: [For reason already stated](#)

RIS location - 4.3 preferred option

16. Which of the Options 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 Australia community?

Comments: [Option C provides for the retention of cages, essential for the provision of affordable protein for the Australian community, provides financial surety for egg farmers and maintains the efficiency of cage egg production](#)

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: [No](#)

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

No Yes Comments: [Option C provides for the same outcomes for all types of businesses and should lead to better welfare outcomes across the layer industry. Any option which provides for the banning of conventional cages will have a disproportionate impact on any cage farm, large or small, when compared to free range or non-cage only farms](#)

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: [Small businesses are generally free range, so any option which doesn't involve the phasing out of expensive infrastructure is going to have a lesser impact](#)