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Animal Welfare Standards Public Consultation
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Submission to the Australian Poultry Standards consultation

Who we are

Australian Ethical Investment Limited was established in 1986 to manage the retirement and other savings of Australians in an environmentally and socially responsible way. Today we manage over \$2.6 billion in superannuation and managed funds for over 40,000 Australians.

As a super fund we invest with long term interests and responsibilities across society and the economy. This perspective is important to consider alongside the voices of individual companies, industries and civil society groups which often focus on narrower business, social or environmental interests. Our broader perspective is embodied in our Ethical Charter (<https://www.australianethical.com.au/australian-ethical-charter/>).

Our submission

Australians are the fourth largest consumer of poultry meat in the world, consuming 42.6kg per person every year¹. The ever increasing demand for poultry meat and eggs has driven the industry towards higher density stocking and accelerated fattening. The majority of animal products consumed today are produced in disease ridden intensive systems, dependant on antibiotics for their survival.

As a large producer and consumer of poultry meat and eggs Australia has a responsibility to vastly improve our standards. **Australian Ethical believes the standards should be set based on the science of animal wellbeing not industry norms.** We have serious concerns that the proposed standards have been developed with undue influence from industry.

This review of the Poultry Standards is an opportunity for government and industry to recognise that social expectations are rapidly shifting. 84% of Australians now think poultry cages are cruel². It is unacceptable for industry standards to be so out of step with public expectations. The industry needs to catch up or else risk losing its social licence to operate.

Battery cages and intensive systems

The proposed standard permits battery cages and cramped living conditions. **Australian Ethical strongly calls for battery cages to be banned.** They have no place in responsible food production. As a responsible investor we do not invest in any companies involved in caged or intensive poultry production. The reasons for banning battery cages are clear including the following:

1) They are not supported by animal science. Research clearly shows that battery cages have a demonstrably negative effect on birds' physiological wellbeing particularly as the birds are prevented from performing even simple locomotor movements. Forcing animals to live in dire conditions with no opportunity to perform any of their natural behaviours is cruel.

¹ <https://data.oecd.org/agroutput/meat-consumption.htm>

² <http://www.abc.net.au/news/rural/2017-11-27/rspca-demands-end-of-caged-egg-in-poultry-welfare-guidelines/9195846>

2) They are unnecessary. Alternative methods of poultry production are widespread.

3) Public support for the industry has dropped to an all-time low with caged egg sales falling rapidly, now less than 50% of sales³.

The caged poultry industry in Australia is currently arguing that cages reduce disease and antibiotics use when compared to free range systems. This argument is flawed. The benefits of cages, in that they can elevate birds off their waste, can be achieved in other production systems such as slatted floor design and regular bedding replacement.

The argument that free range systems use more antibiotics than intensive systems does not appear to be supported by mainstream examples from Australian industry. For example Citi research *Chicken Producers, Antibiotics & Resistance – Deep Dive into Ingham’s and Tegel’s approach* reports that Tegel state only their free range birds are free from antibiotics that are classified by the WHO as important to human medicine and Ingham’s states that unlike their conventional poultry farms their free range flocks are not subject to antibiotic use⁴. Although these companies do not use cages, this indicates their intensive systems are more reliant on antibiotics than their free range flocks.

Antibiotics use

According to the World Health Organization (WHO), antibiotic/antimicrobial resistance has become one of the biggest threats to global human health. Animal agriculture is now the dominant user of antibiotics in the world. Cramped animals in unsanitary conditions survive only by being continually fed routine antibiotics. This in turn poses a serious threat to human health by encouraging antibiotic resistant disease. The British government’s review found that drug-resistant infections could claim 10 million lives each year by 2050⁵. **We recommend that use of antibiotics listed by the WHO as important for human health be prohibited.**

Breeding

The proposed standards permit the use of breeds which are known to have inherent physiological health issues. **Australian Ethical strongly supports phasing out fast-growth, excessive-weight breeds and replacing them with slower-growth, healthy-weight breeds.** The poultry industry has a responsibility to the animals on which it depends to ensure the wellbeing of these animals is safeguarded.

The Victorian Government’s ‘Farmed Bird Welfare Science Review’ found the main causes of mortality in adult meat chickens were metabolic disease and (culling due to) severe lameness. The review found *“both (of these causes) are a consequence of genetic selection for an excessive mass and unnatural body morphology, and both can, consequently, be selected against. The use of strains with a low tendency for musculoskeletal health problems would help to ensure good welfare. New slower-growing strains have been developed by breeding companies in recent years, and are increasingly available commercially”*.

Similar genetic issues are prevalent for turkeys. The Victorian Government’s research found *“Turkeys have been the subject of intense selection pressure. Rapid growth rates, disproportionate accumulation of breast tissue and heavy ultimate slaughter weights can lead to musculoskeletal problems and a range of developmental disorders. These can greatly reduce turkey welfare due to associated lameness, pain, increased susceptibility to fracture, inactivity and compromised behaviour.”*

³ <http://www.abc.net.au/news/rural/2017-01-05/caged-egg-market-trending-down-in-response-to-free-range/8164004>

⁴ Prior, E. (2017) ‘Chicken Producers, Antibiotics and Resistance, Deep Dive into Ingham’s and Tegel’s Approach’, *Citi Research*

⁵ <https://amr-review.org/>

Given the homogenous nature of the breeding industry the issue of fast growing breeds must be addressed at a standards level rather than left to the discretion of individual farmers.

Farm conditions

Current poultry farm conditions have little in common with natural habitat. **At Australian Ethical we believe a fundamental rethink of animal agriculture is required that prioritises quality of life.** Protections need to be introduced into the standards to safeguard animal wellbeing and ensure some semblance to natural bird behaviour.

The standards should require:

- Stocking density being at a level which allows space to move around freely.
- Access to natural light.
- Ammonia be kept below the levels developed in the RSPCA standards.
- Banning routine beak trimming and setting standards requiring infrared beak trimming where the procedure is unavoidable.
- Banning forced moulting. Deliberately subjecting animals to a period of high stress by withdrawing food and water is cruel. The benefit of increased production is outweighed by the harm caused to the animals.
- Mandatory provision of environmental enrichments including perches, scratching areas and nesting boxes for laying hens. (The proposed standards have guidelines around perches and nests, but no enforceable standards).
- We strongly support the introduction of the requirement for ducks to be able to “dip their heads under water or misters/showers to allow ducks to wet preen, and to clean their eyes and nostrils” (SB4.4). Ducks are aquatic animals forcing them to spend all their time on land is one of the biggest welfare concerns in intensive duck farming. We also encourage introduction of guidance around access to water bodies as ducks that are unable to sit or swim in water can suffer from lameness, dislocated joints, broken bones and splay legs⁶.

As outlined in this submission, we are deeply concerned by the lack of animal welfare protections in the proposed standards. We expect substantial revisions to the standards before they are finalised, reflecting scientific understanding of the impacts of production methods on animal health.

We look forward to your considered response to our submission, and would be happy to discuss.

Yours sincerely



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⁶ http://www.aussieducks.com.au/documents/Duck_Report.pdf