

LEGION TRIAL PTY LTD

1 K Avenue
Werribee South VIC 3030

A.C.N. 007 131 035
A.B.N. 13 344 862 729

Phone: (03) 9742 1526
Fax: (03) 9742 1070
Email: info@ltseggs.com.au
Web: www.ltseggs.com.au



Dear Animal Health Australia,

“Our Family” has been producing eggs which is a valuable source of protein to Australian Families for over three generations. My Grandfather migrated to Australia in 1949, a young boy with no family. His goal. To work hard, get married, start a family and buy a farm to produce food and feed his family.

Having grown up on an island with very little where each day was about, IF YOU WOULD EAT rather than WHAT YOU WOULD EAT drove our family into food production.

Our family began farming in the 60’s when all farms were free range. Then the Egg Board(Government) approached all farmers and said that all chickens need to be taken off the ground and put into cages to improve the welfare of the birds and make the eggs safer and more affordable for the consumer.

These stories continue to drive our business and one of our goals is to make food affordable to all families. In 2016 over 2 million Australian’s a year seek food relief (Food Bank Australia Hunger Report 2016) and whilst some people may be able to afford the more expensive eggs, we are providing an affordable egg to feed our everyday Aussie Families. The latest results show a concerning worsening trend.

- ***The facts on hunger in Australia: 3.6 mil***
- ***people report having experienced food insecurity in the last year: 652,000***
- ***people receive food relief from Foodbank agencies, every month: 27%***
- ***of those are children (216,000): 65,000***
- ***people are turned away every month because of food shortages (14,600 of these are children)***
- ***The demand for food relief is rising, irrespective of national economic growth. Last year saw an increase of 10% in the number of people seeking food relief.***
- <https://www.foodbank.org.au/wp-content/uploads/2017/10/Foobank-A4-Infographic-EMBARGOED.pdf>

While we are producing an affordable egg, **at no point in time is the welfare of our birds compromised**. Being a farmer means we look after our birds every single day of the year despite weather, special occasions or holidays because we understand the importance of their health and wellbeing.

We are pleased the draft for the animal welfare code has included cage systems for laying birds as it's a vital system which already produces over 55% of our 16 million eggs which we consume daily. Cages provide a balance between best practice of animal welfare and the food needs of our country.

It is also important to note that in the 1930's a farmer produced food to feed 4 people and by the 1970's a farmer was feeding 73 people, now in 2010's a farmer is feeding 155 people.

The gap between consumers and producers continues to grow giving certain groups the opportunity to run their own misinformation agenda.

WHY CAGES?

Whilst no system is perfect we know from experiencing all the farming systems that Cage Farming is the best practice for producing eggs in volume to feed the growing population. Our farm is in the Western Suburbs of Melbourne and we have found our customers priorities are, buying a safe and affordable egg from farmers they know and trust rather than a system.

We know that cage systems have better welfare outcomes than the other two systems however, it is important for our nation that all three systems are used to meet the diverse needs of the Australian consumer and provide freedom of choice. We meet our customers face to face every day in our own, on farm retail outlet and Café/Restaurant and contrary to what is said by activist groups, our customers are telling us they only want the cage eggs and they want to continue buying them into the future.

With lower mortality rates, less disease, and better production in cage systems we can keep our eggs more affordable for our customers and deliver sound welfare outcomes for our hens.

To produce eggs in volume and make it safe and affordable for the consumer, Cages are the best way as this method of farming results in,

1. Less Mortality
2. Less Disease
3. Less Parasites (Internal & External)
4. Cleaner Safer Eggs
5. Less use of Antibiotics & Chemicals

CAGE EGGS



FREE RANGE & BARN (CAGE FREE)



The consumers idea of Free Range is not thousands of birds multi-tiered in a shed and the only difference between Free Range and Caged Free (BARN) these days is the small openings around the shed called "POPHOLES", that allow access to an outdoor range.

SCIENCE

It is also important to note that despite what has recently been suggested, our 50 years of farming experience tells us that although the bone strength of the birds can be weaker when housed in cages, they in fact suffer less bone fractures than their non-caged counterparts.

There are FOUR key indicators for Animal Welfare,

1. "Injury, Disease and Pain"
2. "Behaviour"
3. "Hunger, Thirst and Productivity"
4. "Fear, Stress and Discomfort"

It is very clear from our experience that Cages outperform the non-caged systems in 3 out of 4 of these indicators and the 4th is subject to opinion.

Science has also proven that Cage systems have less impact on the environment by producing less greenhouse gas emissions as well water and energy usage compared to free range which in turn makes for sustainable future. As cage chickens require less food intake than non-caged birds this in turn reduces the environmental impact on producing grain which has the largest impact on the environment. (Wiedemann&McGahan 2011)

Elson (2015) also highlighted the welfare conflicts between higher mortalities and allowing birds access to a wider range of behaviours through access to an outdoor range.

*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 Free range in its present form can consistently meet this recommendation** (Elson, 2008).*

FREE RANGE & CAGED FREE (BARN)

Free Range and Caged Free is the way my grandparents farmed, and these systems can be done very well on a small scale. They were not designed to be done intensively and pose a major risk to the Chicken, the Consumer and the Environment.

Supermarkets and Large Organizations have taken advantage of the trend therefore, eggs are being produced in non-caged systems in volume and I am certain the consumer would not be happy when they see exactly how they are being produced.

The Supermarkets have driven farmers into these intensive non-caged systems and this system poses the worst Animal Welfare Standards.

They are not the few hundred chickens running around in green grass and living the life of luxury.



The reality is that many of these non-caged systems are large sheds with tens of thousands of chickens with small openings for access to an open range which has little to no green grass.



The outside stocking density has also become a marketing tool, misleading people into thinking that lower stocking density relates to better Animal Welfare when in fact, the outside stocking density is an Environmental Issue. Chickens are birds and all birds flock together, that is reality!

We farm commercially in a Caged System and our customers know this, we do not mislead our customers on how we farm, we are open and transparent, and we are very proud of our farming system.

Over the years our farming systems may have changed but our commitment to Animal Welfare and Food Safety are still our main priorities however we have now added the Environment and Occupational, Health and Safety to our list of priorities.

CHANGES

In 2002 we changed our cage systems to meet the new animal welfare code and invested another 3 million dollars into our business. We were very excited to implement this new technology that allowed for larger cages with lower stocking densities and a fully automated environmental shed.

In 2014 our business was acknowledged in the ABC Rural & Kondinin Group Australian Farmer of the Year Awards. Winning Diversification Farmer of the Year, coming Runner up in Egg Farmer of the Year and Runner up in overall Australian Farmer of the Year.

The demand for our eggs continues to grow and as farmers we are proud of meeting the needs of our customers. We have further plans to expand our production in 2018 to meet the demand however, the uncertainty of the code has delayed our expansion. By finalising the code that includes cage systems, we will be able to expand not only our business but our workforce also. We currently employ 50+ people from the local community and would expect to increase our employee numbers from our local community when we expand. If we listened to our "Customers", we would have already installed more cage egg production.

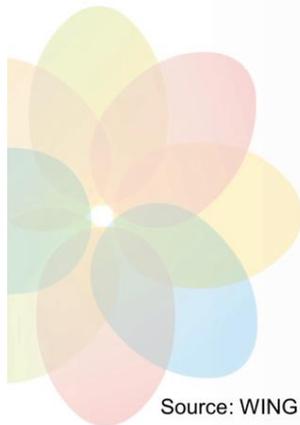
At times, farmers are accused of resisting change therefore, it is important to note that my grandfather was Free Range farming in the late 60's. Free Range farming is "Old Fashioned Farming" and the reasons we took them off the ground was to improve Animal Welfare and Food Safety.

The egg industry was a regulated industry and the "Victorian Egg Board" went to all farmers in the early 70's and told them to get the birds off the ground and into cages to improve the welfare of the birds and produce a safer egg for the consumer.

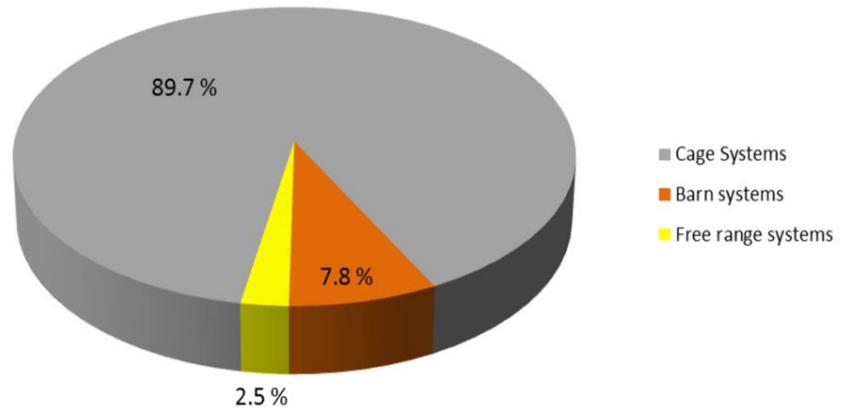
These issues are real, they have not changed, and they have not gone away therefore, should not be ignored.

It is also important to note the Share of Housing Systems World Wide, it may be surprising considering what you hear in the media.

Share of housing systems in global laying hen husbandry



Source: WING



Total: 3.85 billion hens

www.worldeggorganisation.com
www.worldeggday.com

I recently read a comment from a WA minister that said farmers “do not want change”. Egg Farmers have always embraced change, over the past 50 years my family has adopted new technology and invested millions of dollars into our business to improve, Food Safety, Animal Welfare, our Environmental Impact and met all our Occupational, Health and Safety Standards.

More recently, the supermarkets and farmers have ridden the wave of emotion lead by Animal Activist groups cashing in on the “Free Range” trend however, the reality is that the more Chickens we put on the ground the more will die and the higher the risk of disease.

You only need to look at what has been happening in the UK and the EU recently and what continues to happen in Asia.

<http://www.telegraph.co.uk/news/2017/02/02/free-range-british-eggs-could-disappear-supermarkets-next-month/>

<https://www.youtube.com/watch?v=ozym6POFfOU>

<https://www.food.gov.uk/news-updates/news/2017/16486/update-on-fipronil-in-eggs>

<https://www.nytimes.com/2017/11/17/health/bird-flu-asia.html>

CONCLUSION

My family has been farming in Australia since 1968 and we farm to the highest Animal Welfare Standards, the Highest Food Safety Standards, Environmental Standards and Occupational, Health and Safety Standards. Our customers have confidence in our product as we run the Hencare Quality Assurance program which is Third Part Audited Yearly by auditors who have no stake in the Egg Industry.

It is our passion to produce food for Australian Families and we will continue producing food to feed Australian Families without compromising any of our standards especially Animal Welfare.

Our family now farms in cages because the Science and the Egg Board(Government) lead us in this direction. We know that the cage system has improved the Welfare of our Animals.

We know that by putting our Chickens in a non-caged system would result in higher mortalities and more will get sick resulting in an increase in CHEMICAL & ANTIBIOTIC use, HOW CAN YOU EXPECT ANY RESPONSIBLE FARMER TO DO THIS?

As for the happiness of the chickens, I know my chickens are happy! They are well fed, they are in controlled environment sheds and are they are protected from all predators. On days of extreme heat, we do not lose any birds and most importantly our eggs and chickens are completely separated from the faeces.

We support Option "C", where all farmers will be made accountable for their farming practices no matter the size of their operation or their farming system. We also support the standards being mandated in law without exemptions as too many farmers these days fall under the radar and hide behind the term Free Range and Free Range alone does not result in better Animal Welfare.

This public consultation should be about getting the best Animal Welfare, it should not be about the farming systems being used.

Australian Egg Farmers invest millions of dollars into Research and Development every year through compulsory levies and if the Science lead us into cages. How can the Science have changed?

Recently, I have taken positive steps in showing more people my farming system, Politicians, Animal Welfare Groups, Industry Experts, Veterinarians and the General public and while everyone has their own opinions, I have never had anyone point out any Animal Welfare issues in the way we farm.

The Cage Egg Industry has been victimized by Animal Activist Groups by showing graphic images of the old cages, many that are not even from Australian farms. The consumer has been grossly misled into believing that the system is cruel when in fact most people have very little knowledge about the cage system and why we use it.

We do not hide our farming system and we have not played with the definitions in the Model Code to gain a market advantage.

Animal Welfare is important to us as farmers and while our farming systems may have changed in the past 50 years our commitment to the Welfare of our Animals remains our number one priority.

My family are farmers, we may not know a lot about many things but looking after chickens has been our life for 3 generations and it astounds me how people can make comment on our farming systems without ever experiencing life on a farm.

Farming is a passion and is our life, the livelihood of our family and many Australian families depends on it!

Regards,

Brian Ahmed
Nuge Ahmed
Renay Ahmed
Danyel (Ahmed)Cucinotta
Andrew Cucinotta
Hilmi Ahmed