

Submission – Animal Welfare Standards Public Consultation

Dear Animal Health Australia,

My name is Jessica Spencer and I am the Livestock Technical Manager for Days Eggs in South Australia. I am writing a submission for the Animal Welfare Standards Public Consultation because I believe it is only fair that all parties who will be affected by the outcome of these Standards and Guidelines get to have a say on what rules they will or will not inevitably have to comply with.

Firstly, I would like to start off by saying it would be unfair for me to strictly call myself a farmer. I was not born into the agriculture industry and did not come from a long line of farmers or even a hobby farm at home, I just simply have a strong passion for animals which I have heavily directed towards poultry. Make no mistake, I now firmly classify myself as an Egg Farmer and I do work on farms every day having been doing so for the better part of three and a half years but my background is in science. I graduated with a Bachelor of Animal Science Degree in 2013 and each and every day I work hard to try and bring together practical day to day farming with poultry science. My aim being to improve the overall welfare of my laying hens for the benefit of both them and the company I work for.

At Days Eggs I oversee the management of approx. 460,000 laying hens housed in Free Range, Barn and Cage systems and anywhere up to 120,000 chicks in rearing. My job involves a lot of physical work with the chickens but it also involves a lot of behind the scenes work making sure that all of our farms comply with the current Model Codes of Practice as well as the numerous other guidelines that are set out by our customers. This is all achieved by having set in place and enforcing strict policies and procedures relating to the daily monitoring of our birds, their health, environment and of course their production information.

To me however animal welfare is not just defined by a set of rules on a piece of paper. It is almost instinctual and is first and foremost the most important aspect of what we do as farmers and something that not just myself but other farmers go to great lengths to maintain. Providing good animal welfare is about providing the correct environment both physically and emotionally (feed, water, lighting, ventilation, biosecurity and routine) for our birds and in doing so we are rewarded with eggs, which enables us to run our businesses. That's right it is the chickens who control if our business thrives or not.

If you want to put a human emotional reference to egg farming, it would be that a "Happy" chook lays eggs. This translated means that a hen that has good overall welfare produces well. To say that animal welfare was not on our minds is to say that we as farmers don't care about our hens and that is simply not the case. In fact, it is the exact opposite, it's something that we literally live by as we would not be making a living without it. Farming is not a job it is a lifestyle, it's not 9am-5pm but 24 hours a day, 7 days a week, round the clock care and attention and for our hens we do this.

If we can provide all of what I outlined above then we are doing all that we can as farmers to provide our birds with good animal welfare. In saying this it is important to understand that good animal welfare can be maintained in all types of housing systems. To say that free range chickens have better animal welfare than cage chickens because they have the ability to go outside and forage and its nicer to see them like that would be to completely disregard all other factors involved in determining what good welfare actually is.

To make a comparison I will give you an example using an opposing view.

It is said that an animal's basic quality of life can be assessed based on an animal's physical and psychological state using the five freedoms.

1. Freedom from Hunger and Thirst – by ready access to fresh water and a diet to maintain full health and vigour
2. Freedom from Discomfort - by providing an appropriate environment including shelter and a comfortable resting area.
3. Freedom from Pain, Injury or Disease – by prevention or rapid diagnosis and treatment.
4. Freedom to Express Normal Behaviour – by providing sufficient space, proper facilities and company of the animal's own kind.
5. Freedom from Fear and Distress – by ensuring conditions and treatment which avoid mental suffering.

When I read these 5 points and relate them to each of the three major housing systems it becomes clear to me that Free Range although aesthetically pleasing potentially does not fully provide all of the 5 freedoms to my chickens. In fact, if you were to look at it from a completely factual non-emotive standpoint, a Cage system provides more of the five freedoms than a Free Range system does with the exception of freedom 4 point 1 (providing sufficient space) where a cage still provides the freedom just not in the visually appealing way that some may prefer and definitely not in the way lobbyist groups would define.

But that's just it, these freedoms are left open for interpretation and at this point in time our Model Codes of Practice in South Australia are also only guidelines. This means that there is a grey area in defining what farmers should and shouldn't do relating to animal welfare and this creates unease with customers, consumers and lobbyists with how they perceive that we see animal welfare.

The idea behind the new Animal Welfare Standards and Guidelines is to remove the grey area. It will enforce a set of legislated mandatory rules that farmers will have to comply with in order to maintain their businesses and this is supported by farmers to enshrine it in legislation. Most importantly though it will bring all farmers onto the same page where we will all have the same understanding when it comes to what is acceptable animal welfare.

We know that consumers are concerned now more than ever about where their food comes from. Those that are heavily interested want to know that animal welfare is at the top of our priority list when it comes to farming, so I think it is inevitable that mandatory guidelines will be put in place.

I personally think that it is good that EFA is supporting mandatory guidelines as it is the industry putting their front foot forward and saying "hey we want to continually improve and bring all states inline, we want to be open about what we do". As a company Days Eggs embrace best practice and understand that these standards and guidelines will bring into line animal welfare across the board from the small-scale farmers all the way to the large commercial farmers. There will be no grey areas, no blurred lines when it comes to what we must and must not do regarding our hens.

I can't speak for everyone but what I hope to come out of this public consultation is that the decision regarding which set of mandatory guidelines will be enforced, is made based on factual information or scientific research not emotion which currently seems to be forefront when we talk about poultry animal welfare. The presence of emotion can be clearly seen in the different options (particularly D & E) presented as a part of the Regulatory Impact Statement which was released with the new proposed standards and guidelines. These options provide lobbyist and other groups with a gateway

to push for a phaseout of cage systems as well as potentially push for changes to stocking densities and other practices in our other housing systems also.

Having worked in all 3 systems myself and knowing the pros and cons of them all, I am completely in favour of Option C. I believe that the draft Animal Welfare Standards and Guidelines as it stands is written well, it is easy to understand and it outlines all the necessary requirements that must be met in order to provide good animal welfare to our hens, taking into account what actually defines good animal welfare.

My belief from a business sense is that phasing out cages as outlined in Option D will only serve to firstly severely reduce the availability of eggs to the Australian consumer (for us cage eggs still make up approximately 52% of all eggs sold) which in turn will drive up the price of eggs and make them unaffordable to the average consumer and Secondly create instability with farmers who have invested heavily in cage systems potentially causing them to close their doors putting Australian business owners out of business.

If I was to focus however solely on animal welfare and the implications of phasing out cages, then I would be a fool not to mention the main negative welfare impact which would be disease prevention. It is all too true when we say that birds were originally taken off of the ground and put into cages to help prevent disease. Removing cages as a housing system would only put birds back into situations where they are more exposed to avian diseases and this in turn may increase the requirement for and dependence on antibiotics which nobody wants to see either.

When you put birds on the ground and allow ranging you lose the ability to control some of the key welfare factors. Firstly, birds come in contact with their own faeces more regularly and can be exposed to potential harmful bacteria or viral pathogens. Secondly, through ranging they are exposed to all types of weather conditions as we cannot control the external environment, thus there is potential for heat stress. Lastly through ranging we reduce our ability to maintain full biosecurity thus cannot completely control disease movement whether it be by wild birds, pests or simply the wind. We can vaccinate our flocks but vaccines are not absolute and to think that they are would be naive.

Whilst there have been huge improvements in regards to biosecurity practices across the industry as well as improvements pharmacologically in the making of vaccines and the types available, it is not the golden bullet to preventing disease in free range flocks. To be fair cage flocks can also get diseases but the closed shed environment lends itself better to being able to prevent the entry of disease through maintaining stronger biosecurity. It also prevents other stress factors such as weather for impacting bird health and reducing their overall welfare.

When it comes to our birds' emotional wellbeing, most farmers can attest that chickens are social animals. They can recognise other birds within their social group but can also determine individuals who are not a part of the group. Maintaining social hierarchies is an important aspect of keeping emotional stability within a flock. In cages, dominance is established early on and maintained through each individual cage of chickens for their life. In a cage free or free range system individuals have the ability to move freely, meaning continuous re negotiation of social hierarchies. This can cause distress in birds thus negatively impacting their welfare.

Overall there are pros and cons to all systems however the focus needs to be on improving the current systems that we have, not simply phasing them out because they don't comply with the perfect perception of farming. Logic and fact brought about by scientific research needs to be at the

forefront of making decisions that inevitably will not only impact welfare but that will have major financial and economic impacts on our industry also. The effect of letting emotion determine our futures will only see more push back against our farming systems and then it will be a call as to where do we draw the line.

I believe that option C of the new draft Animal Welfare Standards and Guidelines will help use move forward to bring about change and consistency across all Egg farms in Australia and help us to improve our current systems in a way that leaves room for all of them to co-exist in the Australian Egg Industry.

Thank you

Jessica Spencer
BSc (Animal Science)
Livestock Technical Manager
Days Eggs Pty Ltd
PO Box 542 Two Wells SA 5501
220 Devon Road Lower Light SA 5501
Ph 08 85202001 Fax 08 85202777