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Commercial Egg Farmers of South Australia and Tasmania (CEFASAT) welcomes the Animal Health Australia public consultation of the draft Poultry Standards and Guidelines.

Our organisation represents over 80% of all forms of commercial egg production in South Australia and Tasmania and our members operate to the highest welfare standards.

In response to the public consultation process, CEFASAT members wish to provide an egg farmers perspective as a contribution to the current draft standards currently in review.

Our members support Option C of the current standards in its present draft. We feel it reflects the nature of the high standard farming practices in all 3 forms of egg production. Farmers feel that changes to the draft raises serious concerns and would place farmers in a position of further ongoing business uncertainty. Any changes will have a substantial effect on the ongoing investment required to provide future sustainability of affordable eggs to consumers and has the potential to inhibit industry growth.

As a positive contribution to the discussion CEFASAT members list the following farmer perspective for consideration,

1. A popular and mostly unchallenged perception is that the production of eggs and chicken meat is better if it is “free range”. The reality of egg farming demonstrates unquestionably that all production systems provide varying degrees of welfare outcomes.
2. Good management practices on farm is the principal driver and the key to improving bird welfare outcomes in any production system
3. An informed understanding is required to recognize an important aspect of egg farming. Protective confinement will change the behavioral aspects of the hen in regards to foraging and dust preening but in no way should it be construed as cruelty. Foraging is for feed and dust bathing by the hen is to remove harmful skin parasites. By providing continuous feed and placing hens away from soil, this has eliminated the need to dust preen the feathers.

Indeed, all animal lovers manipulate and modify the behavior of animals in their care in order to achieve a better welfare outcome for that animal. Egg farmers are no different.

4. Caged production outcomes on farm demonstrate clearly that mortality levels, disease prevention, well controlled climate housing environment, reduced social groups (pecking order) and reduced medicinal intervention is better achieved in caged egg farming. This invariably translates into better welfare. These aspects are overlooked or ignored in the emotional opposition to caged egg farming but cannot be denied.
5. Non Caged production whilst emotionally perceived as “better” actually loses credibility if the true hen welfare aspects are taken in total. Lack of confinement translates to poorer hen stress management, less predator control capability and results in higher mortality, severe environmental stress, high medicinal intervention and lower productivity. Again, these aspects are overlooked or ignored in the emotional opposition to caged egg farming but cannot be denied.

CEFASAT Members support the current Standards and Guidelines draft Option C to replace Model Code of Practice for the Welfare of Animals: Domestic Poultry (4<sup>th</sup> Edition)

We request that due consideration is given to our concerns as egg farmers and that a ‘true understanding’ of farming practices forms the basis of any Government decisions.

Please feel free to contact below should you require further clarification

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