NSW Legislative Council Select Committee on the Use of Battery Cages for Hens in the Egg Production Industry

Glenys Oogjes, Animals Australia

Supplementary Questions

1. WHAT DO YOU UNDERSTAND THE COST WOULD BE OF PHASING OUT BATTERY CAGES IN AUSTRALIA (AND, MORE SPECIFICALLY IN NSW) OVER 10 YEARS?

Animals Australia is not aware of any accurate assessment of a phase out of battery cages in favour of alternative housing systems. The most recent attempted assessment during the current review of the national poultry Standards and Guidelines (S&Gs) was deeply flawed. The 'Consultation Regulatory Impact Statement' (RIS, 2018) estimated the phasing out of battery cages over a 10-year period would cost the national egg industry approximately $1.355 billion.

However, firstly and most significantly, this figure erroneously included a figure related to the purported additional cost of a change to beak trimming; in fact the new draft Standard (SA9.15) did not significantly alter current practice, thus would not alter death rates as purported, nor was it specific to any particular housing system - i.e. it was both wrong and irrelevant to the cost of phasing out cages. Without the erroneous SA9.15 beak trimming purported cost of $625 million, the RIS assessment of the cost of a 10-year phase out of cage eggs across Australia would therefore be some $733 million.

Secondly, there is a misleading or inadequate assessment of the current inevitable trends toward higher welfare products and thus also little consideration of the likely voluntary commercial decisions that will be made in coming years, leading to an over-estimation of the purported cost of any 'enforced' changes to Standards.

Thirdly, there is no assessment of the consumers' "willingness to pay" higher prices, and thus no assessment of the sector that may ultimately shoulder any additional production costs. This omission is despite the rapidly increasing demands of consumers and corporates for cage-free eggs.

Finally, there is no costing of the age/depreciation status of the current cage stock or other infrastructure to enable costing of an orderly transition (i.e. how many cages or sheds would be being replaced anyway during a phase out period).

2. HOW HAS THE PHASE OUT OF BATTERY CAGES IN NEW ZEALAND WORKED SO FAR, AND IS IT A GOOD MODEL FOR AN AUSTRALIAN PHASE OUT?

In 2012, the New Zealand National Animal Welfare Advisory Council (NAWAC) recommended a stepwise transition period to move egg producers away from the use of cages by 2022. This decision was based on scientific grounds, with NAWAC arguing that the inherent disadvantages of cages outweigh any potential positives of the system. Further, those disadvantages are imposed on every single layer hen for the entire duration of the egg laying period.

The New Zealand process requires (progressively) cages more than 17/18 years of age to be decommissioned, enacting a 10-year phase out. In New Zealand, the 'Egg Producers Federation' has undertaken to report their progress to the Minister of Agriculture each year, and those reports are made public on the Ministry of Primary Industries web page. The most recently published 'transition report' outlines the orderly progression since 2012. The report is provided as an appendix to this document, and it shows that at December 2017, 56% of the national layer hen flock were still caged. This compares to 83% of hens in cages in December 2013, meaning a 27% decrease and that mid-way through the phase out the New Zealand industry is on-track. The industry reportedly remains confident that producers will continue to meet the transition deadlines.

The 2017 New Zealand transition report states: 'The Ministry for Primary Industries will enforce the transition points at 2018, 2020 and 2022. Enforcement will be supported by regulations around transitional requirements away from battery cages commencing on 1 October 2018. Placing the transition dates in regulations means that they are directly enforceable'.

Animals Australia considers this stepwise transition approach is appropriate, and that a shorter transition is possible in Australia given that we likely have a similar portion of caged hens in Australia as the current New Zealand flock. Further, a 5-year transition would be appropriate as our major supermarkets have publicly committed to no longer stocking cage eggs by 2023 (Coles) and 2025 (Woolworths and Aldi).

3. ARE THERE CHEAPER AND BETTER SOURCES OF PROTEIN THAN CAGED EGGS FOR LOW INCOME EARNERS? IF SO, WHAT ARE THEY?

To address this question, we recorded the price and protein content for eggs and alternative products that are available through Woolworths and Coles. We compared the products using the amount of protein in grams per $1, as in Bohrer (2017). Table One provides details of the products identified.

A carton of twelve eggs costs from $3.35 to $5.00 for cage eggs, and from $4.20 to $7.00 for free range eggs. Two 50g chicken eggs (one serving) contains 12.2g of protein on average, regardless of the retail price and system housing the birds. The amount of protein per $1 in eggs therefore ranged from 19.5g to 25.5g for cage eggs and from 11.3g to 20.3g for free range eggs.

Our analysis of current retail offerings shows there are numerous alternative high-protein products readily available to low income-earners in supermarkets. Tofu is one example (up to 21.9g protein /$1) and is often used as a replacement in scrambled eggs and similar dishes for vegans and people with egg allergies. A sauce is typically added to the 'scrambled tofu', which may be a mixture of yeast flakes (11.8g protein /$1), turmeric, ground cumin, paprika and other flavouring. In baking, and particularly in baked cakes, it has been shown that soy milk and soy lecithin (emulsifier) are a promising complete replacement for eggs (Lin *et al.* 2017; Hedayati & Mazaheri Tehrani 2018). Our analysis of Australian soy milks shows some brands have comparable and even greater amounts of protein per cost (up to 29.6g protein /$1).

In addition to replacing eggs as ingredients in meals, other high-protein and low-cost products can be incorporated into people's diets to ensure they consume the recommended daily intake of protein. Some of the foods identified in our analysis include lentils (up to 41.1g protein /$1), peanut butter (50.4g protein /$1), kidney beans (41.0g protein /$1) and sunflower seeds (26.0 protein /$1), though this should not be considered an exhaustive list.

Studies Referenced

Bohrer B (2017). Review: nutrient density and nutritional value of meat products and non-meat foods high in protein. *Trends in Food Science & Technology*, 65: 103-112.

Hedayati S & Mazaheri Tehrani M (2018). Effect of total replacement of egg by soymilk and lecithin on physical properties of batter and cake. *Food Science Nutrition*, 6:1154-1161.

Lin M, Hong Tay S, Yang H, Yang B & Li H (2017). Replacement of eggs with soybean protein isolates and polysaccharides to prepare yellow cakes suitable for vegetarians. *Food Chemistry*, 229: 663-673.

Table One. Comparison of cost and protein amounts in eggs and some egg alternatives that are available in major Australian supermarkets. The information was sourced from Woolworths and Coles online on 28 August 2019.

PRODUCT	PRICE	PRICE /100G	PROTEIN (G) /100G	PROTEIN (G) /$1
PACE FARM 12 EXTRA LARGE CAGED EGGS (WOOLWORTHS)	$3.50	$0.50	12.2	24.4
JUST 4 YOU 12 EXTRA LARGE CAGED EGGS (WOOLWORTHS)	$3.35	$0.48	12.2	25.5
PACE FARM FRESH JUMBO CAGE EGGS 12-PACK (COLES)	$5.00	$0.63	12.2	19.5
WOOLWORTHS 12 EXTRA LARGE CAGE FREE EGGS	$3.95	$0.56	12.2	21.6
PACE FARM LIBERTY CAGE FREE EGGS 12 PACK (COLES)	$5.00	$0.83	12.2	14.6
WOOLWORTHS 12 EXTRA LARGE FREE RANGE EGGS	$4.20	$0.60	12.2	20.3
MANNING VALLEY 12 JUMBO FREE RANGE EGGS (WOOLWORTHS)	$7.00	$0.88	12.2	13.9
LUCKY CHICKEN EGGS RSPCA APPROVED FREE RANGE LARGE EGGS (COLES)	$6.50	$1.08	12.2	11.3
MACRO FIRM TOFU 450G (WOOLWORTHS)	$3.50	$0.78	17	21.9
COLES NATURE'S KITCHEN ORGANIC FIRM TOFU 300G	$2.50	$0.83	16.4	19.7
SIMPLY BETTER ORGANIC PLAIN FIRM TOFU 500G (COLES)	$5.00	$1.00	15.6	15.6
WOOLWORTHS LENTILS NO ADDED SALT (CANNED) 420G	$0.80	$0.19	5.8	30.5
COLES BEANS LENTILS (CANNED) 400G	$0.75	$0.19	7.7	41.1
WOOLWORTHS ESSENTIALS PEANUT BUTTER CRUNCHY 500G	$2.40	$0.48	24.2	50.4
WOOLWORTHS RED KIDNEY BEANS NO ADDED SALT 420G	$0.80	$0.19	7.8	41.0
WOOLWORTHS SUNFLOWER SEEDS 200G	$1.60	$0.80	20.8	26.0
MACRO YEAST FLAKES 200G (WOOLWORTHS)	$8.00	$4.00	47	11.8
WOOLWORTHS SOY MILK 1L	$1.15	$0.12	3.4	29.6
COLES REGULAR SOY MILK 1L	$1.15	$0.12	3.1	27.0

9 July 2019

The Egg Producers Federation (EPF) has committed to annually reporting to the Minister of Agriculture on progress towards phasing out battery cages and transitioning to alternative layer hen farming systems.

The Animal Welfare (Layer Hens) Code of Welfare 2012 requires a transition away from the use of all battery cages to house layer hens by the end of 2022. Older cages are required to be phased out at 2018 and 2020.

This report notes that, as at December 2017, 2,263,037 of the layer hen flock is still housed in battery cages – this is 17% less than in December 2013. While progress slowed in 2016 due to uncertainty in the industry around potential changes to the Code, progress has improved in 2017. EPF has advised that it remains confident that the industry will meet the December 2018 deadline for older cages installed prior to 1999.

The Ministry for Primary Industries will enforce the transition points at 2018, 2020 and 2022. Enforcement will be supported by regulations around transitional requirements away from battery cages commencing on the 1 October 2018. Placing the transition dates in regulations means that they are directly enforceable.

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13 November 2017

Hon. Minister Damien O'Connor
Minister of Agriculture
Parliament Buildings
WELLINGTON

Dear Minister

Re: Cage Transition Report

Since 2013 the Egg Producers Federation of NZ (EPF) has provided to the Minister an annual report on progress by current cage farmers transitioning to alternative layer hen farming systems. Set out below is an update for the 2017 year based on numbers that will apply as at 1 December 2017.

The report is the result of direct engagement with farmers by EPF staff. The survey was e-mailed to farmers and then telephone follow up made if needed. 98% of farmers responded and where responses were not received previous information held by the EPF office was used to complete the report.

	Dec 2015	**Dec 2016**	**Dec 2017**
Total number of egg farms	151	151	**161**
Total size of flock	3,617,061	3,646,047	4,019,761
Number of egg farms using current cages	34	34	34
Size of current cage flock	67.8% 2,455,373 million hens	67.1% 2,447,182 million hens	56% 2,263,037 million hens

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Three current cage farms tell the EPF they are exiting the industry in 2018.

Nine current cage farms are undecided on their future, their transition dates being 2020 or 2022.

As at December 2017, 56% of the layer hen flock is housed in current cages. This compares to 83% in December 2013 – a 27% drop.

Currently 56% of birds are in current cages, 14.4% in colonies, and 29.6% in free range and barn.

Yours sincerely

Michael Guthrie
Chairman
Egg Producers Federation of New Zealand (Inc.