Submission No 399

INQUIRY INTO USE OF BATTERY CAGES FOR HENS IN THE EGG PRODUCTION INDUSTRY

Name: Name suppressed

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

Key Points

Mortalities

If cages are banned in Australia the mortality levels will go from 3% in cages to 8% in alternate systems under Australian conditions. This is 540,000 hens per year or one extra hen per minute that will die if cages are banned

A new welfare standard that kills and extra 540,000 hens per year can not be seen in any way to improve the welfare of poultry in Australia. Disease is also greater, as is discomfort from broken bones and injuries.

While cages result in behavioural restrictions, the death, disease and discomfort in non-cages systems suggest that birds in these systems also experience concerning welfare challenges. As non-cage systems have higher mortality and disease rates it is suggested that birds do not cope well in non-cage system. This would suggest that that the behavioural restrictions in cages do not represent a welfare challenge greater than that experienced by bird in non-cage systems.

Furnished Cages

Whist furnished cages are a theoretical option, furnished cages are not a practical option in Australia. To invest large amounts of capital to make no increase in returns to fund the investment is in no way a practical option. With groups like RSPCA running their "a cage is a cage" campaign, poultry producers are highly unlikely to invest in this segment of the market as it would be high risk with little prospect of any viable returns.

Public Perception

As has been made public, a number of people have made submissions to Standards and Guidelines for cages to be banned. These submissions must be view in context.

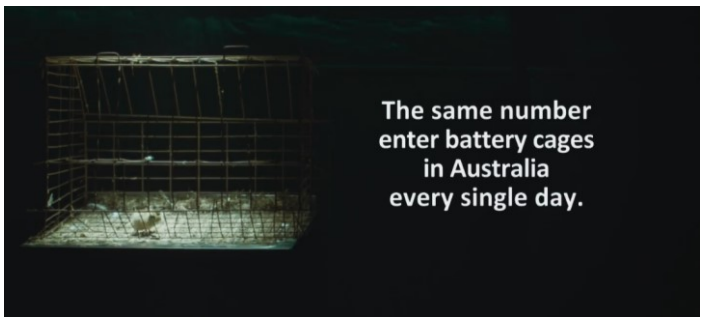
Groups such as Animals Australia have used imagery that completely misrepresents that current standards within the Australian industry. This image was used to engage people to click through and sign petitions. The image is of American hens and the image has been photoshopped to look like and Australia cage by removing the cage door handles.

The original image can be found at http://www.gettyimages.com.au/detail/photo/chickens-in-cages-at-a-conventional-high-res-stock-photography/596280610

The cages in this photo have been illegal in Australia since 2008. American standards also allow for much higher stocking densities than Australia.

RSPCA has also used imagery of old illegal cages in its public presentations (Source Twitter)

RSPCA also uses imagery of old illegal cages in its social media campaigns (https://www.facebook.com/RSPCAAustralia/videos/10155586435227984/).



Recently RSPCA Australia was caught out claiming in social media that one of their publications was "*was peer-reviewed and published in the World Poultry Science Journal in December 2017, where it remains their 'most read' article to date*". This was quickly identified as a false and misleading claim. But if it had not been called out, it would have been left to mislead and deceive the public.

Unfortunately, there is no consequences for charities, their staff and director who choose to actively mislead the public.

Given the large volume of misleading information presented to the public, submissions to review processes to ban cages must be viewed with caution and questioned if they represent an informed view on the issues to be considered.

The survey claims of activist groups regarding the community's desire to ban battery cages is in no way reflected in peoples' buying habits. These surveys typically elicit a response that people think they should give rather that what people actually think. These surveys results are also significantly different from those of veterinarians and industry professionals who would be considered more informed on the issues to be considered.

Whilst 160,000 submissions to a national call for public submissions at first may seem a large response, in the modern era of social media it is very low and falls to demonstrate real community interest in the issue. Only very little information was needed to be entered and the time commitment was minimal to create the click through submissions. Despite many millions of impressions across several sites, only a minuscule percentage of responses resulted. Despite Animals Australia's Facebook page alone having 1,661,953 likes and 1,633,515 followers, less than 10% of an engaged audience were prepared to even participate in a simple click-through campaign. The use of misleading images in some case was not even sufficient to bring forth a response that could be considered notable.

Commercial Free-Range Welfare

There is an assumption the free-range represents higher welfare outcome and we should do what is done in Europe. These views are not supported by key authors in the literature.

Bristol University combined welfare measures (mortality, injurious pecking and bone fractures), and summarised the situations for the average free-range hen. (Free range v cage: Science behind the headlines. Nicol, Christine Poultry World; Dec 2013; 168, 12; ProQuest Pg. 32)

- *By the end of lay, 10% will have died. Of the survivors, 42% will experience both a fracture and a significant number of severe pecks, 22% a fracture and 20% severe pecks only.* ***Only 12% of surviving birds will be unharmed****.*
- *The most generous view might be that there is a significant welfare impact for only half the birds affected. Perhaps the other half meet painless deaths, recover quickly from a very small fracture or experience one of these events just hours before depopulation. But even with this interpretation of the figures, more than half of free-range hens experience a significant welfare insult.*
- *Perhaps this is only to be expected? After all, death is part of life, and accidents do happen. We need to benchmark what we could reasonably expect.*
    - *Take mortality – at the end of lay a hen is 20% through her potential lifespan of eight years. Comparisons with other species (including humans), suggest that mortality at this stage of life should not exceed 2% if good preventive health measures are in place. More realistically, perhaps, the targets published by most breed companies suggest that mortality should not exceed 4%, a figure that is often achieved in cages.*

- ***Free-range hens are therefore dying routinely at rates that are two or three times higher than they should be, and on some farms at rates that are more than eight times greater.***

Elson in 2015 also raised concerns that free range may not delivery a suitable welfare outcome for hens.

> *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 FR in its present form can consistently meet this recommendation (Elson, 2008)***. (Elson, H.A., 2015. Poultry welfare in intensive and extensive production systems. World's Poultry Science Journal, 71(3), pp.449-460.)

Banning cages and forcing farmers to kill large numbers of hens and place them in systems which hen welfare is already questioned is not a desirable outcome of welfare legislation and regulations.

Australian and Canadian researchers[1] recently found;

> "*The present experiment provides no convincing evidence that either reducing space allowance in adulthood from 1648 to 542 cm2/bird or eliminating access to a nest box results in disruption of biological function. Less space and no access to a nest box did not increase the choice for more space or a nest box, respectively, over food in the preference tests.*"

Consumers have a Choice

The is a wide variety of eggs available in the marketplace. Consumers can choose eggs that meet their expectations. Those consumers who dislike cage egg production have many purchasing options available to them. Products are labelled with the production system and consumers can buy according to their preferences.

Economic Implications

The egg industry in NSW employs 821 people of which 30% are women. The egg industry also provides numerous opportunities in rural and regional areas the would be considered entry level position. Continuing and ongoing regulatory uncertainty is jeopardising investment and continued expansion. If cages where banned it in unlikely that there would be confidence in reinvesting in the egg industry. Many of the younger generation do not want to risk investment in the industry and new investment is unlikely as the long-term regulatory framework is too uncertain.

[1] Engel, J.M., Widowski, T.M., Tilbrook, A.J., Butler, K.L. and Hemsworth, P.H., 2018. The effects of floor space and nest box access on the physiology and behavior of caged laying hens. Poultry science, 98(2), pp.533-547.

Following the Banking Royal Commission, valuations of specialised capital such as egg production facilities has been significantly reduced and finance has become much more difficult to source. If cage facilities are to be replaced it is difficult to conceive that funding will be accessible to replace these facilities.

Worker Safety

The Coalition for Sustainable Egg Supply[2] found the following impacts of housing systems on worker safety

- While working in the aviary house, workers were exposed to significantly higher concentrations of airborne particles and endotoxin (toxic components of bacteria) than when working in conventional and enriched houses; exposures in conventional and enriched houses were similar to one another.
- Though there was high mask use among all workers, short-term respiratory health was marginally worse, including lower lung function and more respiratory symptoms in the aviary versus the enriched or conventional houses.
- While tasks in each of the houses posed ergonomic challenges for the workers, gathering floor eggs in the aviary required them to adopt extreme body positions for extended periods and exposed them to multiple respiratory and ergonomic hazards because they had to crawl and lie on the floor.

Environmental Impacts

The environmental impact (including carbon footprint) is significantly less for cage systems. Nutrients in cage systems are easily collected and reused. Environmental impacts are lower as feed usage and production efficiency is much better in cage systems.

The Coalition for Sustainable Egg Supply[3] found the following impact impacts of production systems

- Daily mean indoor ammonia concentrations, particulate matter (dust) levels and particulate matter emissions were all highest in the aviary house and lowest in conventional and enriched colony houses.
- Farm-level (house + manure storage) ammonia emission was lowest for the enriched colony system, approximately half that of conventional or aviary systems, presumably due to its lower stocking density and drier manure.
- In the aviary house, 77% of manure was deposited on the belts and the rest on the litter floor when hens had free access to that area. Manure removed from the enriched colony house was drier and had a slightly higher nitrogen content than that removed from conventional or aviary houses.

[2] https://www2.sustainableeggcoalition.org/document_center/download/final-results/SummaryResearchResultsReport.pdf
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Notably free range was not included in the study as free range is not a common system in the United States. Concerns around avian influenza and *Salmonella enteritidis* have meant free range systems are very limited in the United States.

Cage Egg Demand

Cage egg sales remain strong. Whilst market share is declining the total number of cage eggs sold is not declining significantly. If cage supply was to decline, maintaining a consistent market supply would be significantly impacted.

4 million Australians[4] (including 800,000 children) have experienced food insecurity in Australia during the last year. People living in rural and remote areas of Australia are 33% more likely to have experience food insecurity in the last year. Removing an affordable food source that is highly nutritious will have significant impact on a section of community that is least able to adapt.

Making eggs more expensive would have significant impacts on the most vulnerable members of the community.

[4] https://www.foodbank.org.au/hunger-in-australia/the-facts/