

**Submission
No 408**

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

Organisation: Egg Farmers of Australia

Date Received: 25 July 2019



Egg Farmers of Australia Submission to the NSW Select Committee on the Use of Battery Cages for Hens in the Egg Production Industry.

The information included in this submission relates to:

1. The role of Egg Farmers of Australia
2. The incorrect terminology pertaining to a specific production system
3. Community Expectation
4. Health of Employees
5. Animal Welfare
6. Australian Animal Welfare Standards and Guidelines – Poultry
7. Financial and Social impacts
8. Conclusion
9. References
10. Contact and email details for Egg Farmers of Australia

1. Egg Farmers of Australia

Egg Farmers of Australia is the national representative body of Australian egg farmers. We represent eighty five percent of all Australian egg farming.

Egg Farmers of Australia is the voice of Australian egg farmers. We advocate on key policy issues affecting our industry and promote egg production by providing transparent information to the public.

2. Incorrect terminology pertaining to a specific production system

It must be noted that the terminology 'battery cages' chosen by the Select Committee for their inquiry is politically incorrect. Battery Cages is a term reminiscent of the 1930's where one hen was housed per cage.

The variety of cages now available are vastly different from the cages used many decades ago. Current conventional cage production systems, managed well, provide good animal welfare outcomes. Conventional cages are indoor systems housing groups of hens.

Egg Farmers of Australia suggest that the wording conventional cages be used when referring to the current production system.

3. Community Expectation

In 2018, Australian Eggs commenced engagement with the Australian community through a Sustainability Framework process with the aims of tracking public views on the impacts and contributions of the egg industry to identify issues of interest to the public; engaging genuinely with the public on issues of interest to correct misconceptions and acknowledge residual concerns; demonstrating how the egg industry is addressing issues of interest and applying international best practice on hen welfare, food safety and biosecurity; and reporting transparently on industry progress in key areas.

Australian Eggs commissioned the CSIRO as an independent research body to conduct a community survey and analyse the results. The response was able to show that community value the egg industry given it is well regulated, responsive to public sentiment and that the egg industry benefits outweigh the costs (Australian Eggs, 2019)

Public consultation through the CSIRO representative sample and online survey is a way that public sentiment is able to be tracked. Research through public consultation to understand community expectation will continue to 2020 (Australian Eggs, 2019).

The key findings of the research made it clear that Australians have a positive image of the industry and understand that eggs are an affordable, nutritious staple in diets and that the industry creates jobs. Participants were keen to ensure that hen welfare is important (Australian Eggs, 2019).

The increased demand for eggs from all production systems by the public makes it clear that production is consistent with community standards and supported by the public.

4. Health of Employees

Conventional caged systems have a number of health benefits for employees. Employees work in a biosecurity-controlled environment. This is therefore a very clean environment given that clothing used to enter sheds is only used while in the shed.

As the shed is climate-controlled, the employee works in a very pleasant environment. Both the owner of the facility and employee are comfortable in the knowledge that they do not have to work in the heat or cold often experienced by employees in other production systems. There is also the reassurance that there is very minimal chance of sunburn given that the work undertaken in the shed is indoors.

Sheds are a dust free environment. This allows employees with respiratory problems to be able to work in the poultry industry.

It should be noted that in production systems other than conventional cages, it is a workplace health and safety issue when workers need to collect floor eggs. Floor eggs are those eggs that are laid by hens on the floor of a barn or ground and must be collected by hand. There is a high chance that floor eggs can be soiled or cracked and may not be collected immediately. A farmer may therefore not be sure when the egg was laid and the egg will have a shorter shelf life.

5. Animal Welfare

The Poultry drafting group have referenced Hemsworth et al., and the current frameworks pertaining to Animal Welfare.

Animal welfare can be assessed using three different frameworks, based on measures of biological functioning, affective state or natural living (Hemsworth et al., 2015).

The biological functioning framework accepts that welfare problems will result from poor adaptation of an animal to its environment. Severe challenges may overwhelm an animal's capacity to adapt and may result in death, while less severe challenges may have impacts on growth, reproduction and health (Hemsworth et al., 2015).

The second framework assesses the affective (or emotional) state of the animal. Affective states may be positive or negative. A positive affective state is linked with a predominance of positive experiences, such as the experience an animal has when it engages with a rewarding behaviour (Mellor, 2015). Affective states may be assessed using such measures as preference testing, behavioural observation and physiological testing (Hemsworth et al., 2015).

The third framework uses the concept of natural living. It assumes that the welfare of an animal is better when it can express its normal patterns of behaviour. This approach draws attention to the potential welfare benefits of providing opportunities for animals to engage in natural behaviours. However, the concept of 'natural' is often poorly defined, and this framework does not provide a rigorous scientific basis for welfare assessments (Hemsworth et al., 2015).

6. Australian Animal Welfare Standards and Guidelines - Poultry

The process of the *Australian Animal Welfare Standards and Guidelines - Poultry* commenced in June 2015. It should be noted that prior to the commencement of the process, preliminary discussions were undertaken by egg producers at a range of industry forums pertaining to the Animal Welfare Code. The *Animal Welfare Group* set out the Standards and Guidelines process.

Egg Farmers of Australia voluntarily commenced in liaising with Government in order for the adoption of standards proposed in a Consultation Regulatory Impact Statement (**RIS**). This action was taken in order to replace the Model Code of Practice (**MCOP**) for the Welfare of Poultry 4th Edition.

Egg Farmers of Australia have made a number of submissions that are available publicly. Industry anticipates that at the end of the process, mandatory national

standards and future stability for the industry will result. Industry envisages that moving from voluntary to mandatory standards will allow for improved welfare outcomes and that the Animal Welfare Task Group (AWTG) will note the improvement that can be made from these mandatory standards.

It is therefore crucial that the Select Committee note the current work being undertaken by stakeholders in the Standards and Guidelines process.

Further, it should be noted that as the Standards and Guidelines (S&G) process has progressed, there has been four principles in order to guide the AWTG and Drafting Group – That the (S&G):

1. are desirable for livestock welfare;
2. feasible for industry and government to implement;
3. important for the livestock-welfare regulatory framework, and
4. achieves the intended outcome for livestock welfare.

The above principles are essential for consideration of the Standards and Guidelines. There will not be a balance should all the focus relate to only one principle.

In relation to legislation, Egg Farmers of Australia would suggest that the NSW Government consider the Australia Animal Welfare Standards and Guidelines – Poultry once the Agricultural Ministers' Forum Meeting (AGMIN) has endorsed the Standards and Guidelines.

7. Financial and Social Impacts

Financial Impacts

Changes to current egg production systems will result in financial impacts being experienced by both consumers and producers.

Eggs are a low-cost protein allowing people across all income brackets to include protein in their diet. Should current conventional cage systems be unable to operate through Government intervention, the price of eggs will increase.

Over the past 3 decades, Australian egg farmers have experienced 3 major industry restructures.

1. In the mid-1990s the national industry was de-regulated causing a substantial change to industry dynamics and a large number of farms closing down.
2. In the early 2000, new conventional cage legislation was adopted nationally which forced farmers into multi-million dollar re-investment into new cage infrastructure. Much of this debt is still being serviced and many left the industry.
3. In mid-2014 Retailers maneuvered the market into non caged egg production with the threat to stop selling caged eggs by 2018. Most farmers responded again and have now fully overstretched capacity to finance to meet this threat. Those same supermarkets, while claiming now they have aspirational targets for non-caged eggs, are still demanding caged egg supply.

Any changes to current production systems yet again will have major impacts on egg producers over the next 15 years. Egg producers plan financial investment based on return on investment of the facility. In the last 15 years, farmers have financed millions and millions of dollars in high standard Infrastructure. Millions of dollars has been financed over a 20-30 year period and the poultry industry has also experienced a number of past restructures committing producers to still be paying off bank loans for previously installed infrastructure, whilst at the same time financing the current infrastructure. The industry could not be further impacted given the current debt ratio.

The introduction of Standards and Guidelines will have an impact on both current finance and future financing. The conclusion of this process will allow producers to understand any further liability and consider if they can afford future investment in the industry. With an increasing population resulting in a demand for egg production to increase 3% per year, it is important that egg producers are confident to invest in increased production.

Social Impacts

Impacts to egg production that place a financial strain on egg producers will result in major social impacts.

Egg Farmers are being subjected to imposed changes and high gearing which is outside of their strategic business planning. The uncertainty this creates is having major impacts on the financial and psychological wellbeing of farmers and families that cannot survive further debt.

The Royal Australian and New Zealand College of Psychiatrists make reference that in rural and regional areas, a key influence on mental health is the regional economy.

Social isolation as a result of distance is an important factor in the mental health and well-being of rural people. Geographic isolation can also affect access to mental health services: the closest mental health service may be several hours' drive away. (The Royal Australian and New Zealand College of Psychiatrists, 2019)

8. Conclusion

Egg Farmers of Australia supports conventional caged production. Through the Standards and Guidelines process, industry has put forward the following option for consideration and or inclusion in the Decision Regulatory Impact Statement (RIS).

- a. Continual use of conventional cages at 550 square centimetres;
- b. A commitment that there would be no new additional conventional cages and;
- c. That any new caged production system be a minimum of a furnished cage at 550 sq cm per bird and require perches, a scratch rail and nesting area included in the 550 sq cm spacial allowance.

Pathway C would allow only the existing conventional cage egg farms to continue producing eggs from existing conventional cages. Any additional new cages would need to meet the minimum standard for a furnished cage, as outlined in the definition above.

Egg Farmers of Australia would welcome the opportunity to provide further engagement with the Committee through an invitation to appear at hearings pertaining to this process.

9. References

Australian Eggs. (2019). Sustainability Framework Report 2019.

Hemsworth, et al. (2015). Scientific assessment of animal welfare. *New Zealand Veterinary Journal*

Mellor, D et al. (2015). Extending the 'Five Domains' model for animal welfare assessment to incorporate positive welfare states

10. Contact details for Egg Farmers of Australia

For further information pertaining to this submission, please contact Egg Farmers of Australia CEO, Mrs Melinda Hashimoto by email