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Submission to the Public Consultation on the Proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry

Vegan Australia is pleased to have the opportunity to provide a submission in response to the draft Australian Animal Welfare Standards and Guidelines for Poultry. We hope this submission assists in preparing the final document.

Vegan Australia is a national organisation that informs the public about animal rights and veganism and also presents a strong voice for veganism to government, institutions, corporations and the media. Vegan Australia envisions a world where all animals live free from human use and ownership. The foundation of Vegan Australia is justice and compassion, for animals as well as for people and the planet. The first step each of us should take to put this compassion into action is to become vegan and to encourage others to do the same. Veganism is a rejection of the exploitation involved in commodifying and using sentient beings.

This public consultation is an opportunity for the community to reflect on the use of chickens and other birds in the agriculture industry. Every year over half a billion chickens are bred, raised and killed in Australia for food. This consultation is an opportunity to consider alternative ways we can obtain food which do not involve the suffering and killing of these animals.

It is important to emphasise that chickens, ducks, turkeys and other birds suffer pain and their lives extinguished at a young age to produce products that are not necessary for human wellbeing. All these products can be replaced by plant-based alternatives.

Introduction

Animals are not ours to use. This includes chickens and other poultry used in the animal agriculture industries. They value their own life and body and have an interest in continuing their existence and avoiding suffering. They should be treated with respect and justice and should not to be treated merely as commodities. Further, production of animal products necessarily results in their suffering and death.

In addition, humans have no need for any animal products and in particular are able to live healthily on a vegan diet. In fact, many people who adopt a nutritious vegan diet will enjoy significant health improvements by reducing the risk of major killers such as heart disease, stroke, cancer and diabetes and reducing the health care burden from these chronic diseases.

In this submission, Vegan Australia attempts to show two things. First, that any agricultural system that uses animals (including poultry) will cause suffering to those animals. And second, that humans do not need to consume any animal products, as has been shown by extensive research in nutritional science.

We also propose significant changes to the agricultural system (including poultry) in Australia. We believe that these proposals are in the best interests of the individual animals and support the primary goal of the standards, which is to minimise the risk to poultry welfare.

We note that the 2017 Victorian Animal Welfare Action Plan, acknowledges that animals are sentient. There is a growing body of evidence that all animals, including mammals, birds and fish are sentient, that is they experience the world and have the ability to perceive and to feel pleasure, pain and a variety of emotions, both positive and negative.

We also note that the 2016 Regulation of Australian Agriculture Draft Report, by the Productivity Commission, acknowledges that "there are some Australians who do not consider it appropriate to use animals for commercial purposes."

Vegan Australia's call for submissions from the public

As part of the public consultation process, Vegan Australia encouraged members of the public to make submissions calling for the end of poultry farming. At the time of writing, over 900 people had made such submissions. We attach a list of these submissions, with comments from the submitters. The main submission text is as follows:

To Animal Health Australia,

In response to the draft standards for poultry, I note that:

- Humans can live happy and healthy lives without consuming the products of the poultry industry (or any other animal industry).
- No matter what farming "system" is used to raise chickens and other birds, whether caged, barn or "free range", they all suffer and they all die in a slaughterhouse at a fraction of their natural lifespan.
- All of the options under consideration in this review assume that the breeding, raising and killing of poultry will continue indefinitely in Australia.

I propose that another option be included, one to phase out the farming of chickens and other birds. This proposal is based on the science of animal sentience and nutritional science.

No regulation of animal farming can ensure the wellbeing of animals who do not want to die.

For all animals.

Regards,

NAME

The goal of the Welfare Standards for Poultry

One of the stated principles of the standards is to "minimise the risk to poultry welfare".

In the interests of best protecting individual birds, we propose that the goal of the standards should be the abolition of the breeding, raising, killing or any use of poultry, whether for food, clothing or any other purpose. Every day over one million chickens are slaughtered for food in Australia. This needs to stop.

The end goal of any animal welfare regulation should be ending all animal use by humans, in particular ending animal agriculture. This should be specified in the standards, which should also set out steps for the complete phasing out of poultry production in Australia. It should also specify a time scale for this process. We propose that a ten year phase out period be set.

Recognition of the sentience of poultry should be explicitly included and acted on in the standard, in a similar way to the New Zealand Animal Welfare Act which stipulates that it is necessary to 'recognise animals as sentient'. In other words, to recognise that animals can experience both positive and negative emotions, including pain and distress.

Ending the use of poultry in agriculture will have the greatest benefit to the welfare of the individual animals. Anything less will mean their continued use, suffering and death. Our proposal is based on science and ethics as we discuss below.

While focused on minimising the risk to poultry welfare, the standards will also require a broader range of measures and will need to call on a number of government departments, including agriculture, planning, education and treasury, to ensure an orderly transition to a fully plant-based agricultural system. The standard should continue the research begun by Vegan Australia into how a phase out of animal agriculture would affect a number of sectors, including land use, the environment, the economy, employment and human health. An economic impact assessment should be carried out, looking at how to phase out animal agriculture (including poultry) with the least impact on the economy and employment. Note that the animal agriculture industry contributes only about 1.2% to the Australian economy. The poultry meat industry makes up only 0.1% of Australia's agricultural exports and employment in the poultry industry represents only 0.2% of total Australian employment. Over a ten year phase out period, any dislocations should be manageable and alternative industries be set up. While much work remains to be done in ensuring a smooth transition to purely plant-based agriculture, doing so would be of benefit to Australia in the medium to long term, and, of course, of benefit to animals in the immediate term. See the research into moving to a vegan agricultural system carried out by Vegan Australia.

The Regulatory Impact Statement gives seven options, all of which assume that the breeding, raising and killing of poultry should continue indefinitely in Australia. We propose another option: to phase out the farming of poultry (and all other animals).

Any regulation impact assessment process to be carried out for the standards must include the impact on animals. Merely assessing the impacts on the humans affected by changes would ignore the intended beneficiaries of animal protection legislation.

Rationale for phasing out animal agriculture (including poultry)

The rationale behind the proposal to end the use of animals in agriculture is simply to avoid causing unnecessary suffering as much as possible.

All farmed animals suffer and they suffer in huge numbers. Currently over 600 million animals are bred and killed in Australia each year, the majority of them being chickens. That's an incredible 1000 chickens killed per minute. Some of the suffering endured by farmed poultry includes these standard practices:

- painful beak trimming without pain relief
- difficulty eating and drinking due to beak trimming
- overcrowding and the pecking and disease this can cause
- light-deprivation
- induced moulting
- catching, handling and killing by unskilled workers
- living in a dirty environment, with build up of excreta
- lack of freedom
- lack of perches, nests and litter for layer hens
- bare surroundings
- intensive confinement and the bone fractures this can cause
- living in their own excrement
- permanent confinement
- use of invasive surgical procedures without anaesthetic such as castration
- unnaturally high egg laying rates
- breeding chickens to grow so heavy their legs break
- depopulation
- food and water deprivation during long painful transportation and the associated stress
- slaughter at very young age (just six weeks for 'meat' chickens)
- artificial insemination
- separation of mothers and chicks
- gassing or macerating day-old "surplus" male chicks in the egg industry
- being scalded or cut open alive on kill lines

Note that the standards are silent on some of these issues, such as the routine killing of male chicks in the egg industry. In light of this list, the statement by the standards that "The farming of poultry can pose risks to animal welfare" seems naive.

Normally chickens can live for many years, but chickens farmed for their flesh are slaughtered when they are just babies, at 6-8 weeks. Due to selective breeding, these chickens grow at such abnormal rates that most suffer painful skeletal disorders by the time they are slaughtered.

After a life of intense suffering, all animals in the poultry industry are killed at a very young age, drastically cutting short their normal life span. Each animal values their life and doesn't want to die. Even animals raised in "free range" systems suffer many of the same practices and end up at the same slaughterhouse. There is no such thing as the

"humane slaughter" of an animal who doesn't want to die.

Breeding and killing farmed animals is not necessary. Humans don't need animal products to live healthy and fulfilling lives.

Wellbeing of farmed animals is not possible

The wellbeing of animals and their commercial use in agriculture are incompatible.

Farmed animal welfare regulations are currently woefully inadequate and any possible future changes will never be enough to ensure the wellbeing of the animals. Currently, commercially farmed animals are exempted from the overarching anti-cruelty and duty of care standards included in animal welfare legislation. Horrific acts which cause great suffering and which are illegal to perform on domestic pets, are quite legal and standard practice for farmed animals. It is completely illogical that the same suffering can be inflicted on the same animal and yet the legality of the act depends on whether the animal is a family pet or a production unit on a farm. The laws allowing this are, in effect, legalising cruelty.

Current regulations are barely enforced and any 'improvements' would suffer the same fate.

It is clear that the animal production system could not economically survive if the same animal cruelty laws applied as for pets. The financial costs would be too high. And proposed "higher welfare" practices are only a little better than current standard practices and are constantly being degraded by the pressure of competition to make a profit. And in any case all animals end up at the same slaughterhouse at the same young age.

Discussion and arguments about "free-range", stocking densities, range rotation, organic, the use of anaesthetics, etc, are diversions from the real issue. The animal industry will fight and delay at every change. No amount of tweaking regulations will ever be enough. The only ethical solution is to end the use of animals in agriculture.

Use of credible scientific evidence about animals

Farm animals feel pleasure and sadness, excitement and resentment, depression, fear, and pain. They are far more aware and intelligent than we ever imagined ... they are individuals in their own right. ~ Jane Goodall

Vegan Australia agrees with the emphasis the draft standards place on using credible scientific evidence to determine animal policy. As the draft states, standards should be "underpinned by science".

The evidence of animal cognition should be the primary factor in creating the standards. Scientific knowledge supports the common belief that animals are sentient, have emotions and can feel pleasure and pain. Animal welfare laws have existed for almost two centuries, so the fact that animals can suffer is not a new concept. This is supported by the draft standards, which often use words to describe inner subjective states, such as "pain" and "distress".

Scientific research has discovered that the pain and pleasure mechanisms in animals are very similar in all vertebrates, including humans. The pain-inhibiting mechanisms found in the human body are very similar to those found in other animals.

Professor of Bioethics at Princeton University, Peter Singer, states "it is surely unreasonable to suppose that nervous systems that are virtually identical physiologically, have a common origin and a common evolutionary function, and result in similar forms of behaviour in similar circumstances should actually operate in an entirely different manner on the level of subjective feelings."

Animal behaviorists have found that, given amenable conditions, farmed animals interact in socially complex ways, bonding with family members and developing friendships over time. They have "rich and deeply emotional lives". Raising animals in crowded conditions is very stressful to them because it upsets their social structure.

The Victorian Department of Primary Industries states that "all livestock species (and fish) have the necessary brain structures and nervous system to allow them to feel pain and suffer". In addition "all livestock species are capable of comprehending and desiring pleasurable experiences."

The draft report of the 2016 inquiry by the Productivity Commission into the regulation of agriculture states that "the welfare of animals is judged on the basis of: how well the animal is performing from a biological functioning perspective; affective states, such as suffering, pain and other feelings or emotions; the expression of normal or 'natural' behaviours." Observation suggests that none of these are met in any commercial agricultural system, especially in poultry systems.

Both ethical considerations and credible science are important in determining welfare standards. These two concepts are not mutually exclusive. There is no conflict between the ethical consideration that it is wrong to inflict unnecessary suffering on animals and the scientific fact that farmed animals are sentient beings capable of suffering.

See more about animal sentience, emotion and behaviour here:

- Animal sentience, Voiceless (<http://www.voiceless.org.au/the-issues/animal-sentience>)
- The Someone Project, Farm Sanctuary (<http://www.farmsanctuary.org/learn/the-someone-project/>)
- Industrial farming is one of the worst crimes in history, The Guardian (<https://www.theguardian.com/books/2015/sep/25/industrial-farming-one-worst-crimes-history-ethical-question>)

Not only does science support the idea that chickens have emotional inner lives, but also they have complex social lives. Chickens live in stable social groups that demonstrate sophisticated social behaviour. They recognize each other by facial features and can remember more than a hundred other chickens. They have over 20 cries they use to communicate, including alarm calls depending on whether predators are approaching by land or sea. They're good at solving problems and understand that items removed from sight continue to exist - something that small children can't do.

Chickens also are very intelligent. George Watson, Professor of Health Sciences at Curtin

University, says that 'birds, in general, have smarter brains than most mammals. They run rings around dogs and probably dolphins, too. Most birds have incredibly good memories, learning and problem-solving abilities.'

He goes on to say that bird brains have to be even more efficient than mammals' because their brains have to be small and light in order for them to fly. Land mammals have the luxury of having any sized brain as long as they have the neck muscles to support it, but birds have a power-to-weight issue so they have very clever brains in a very small space.'

He points out that impressions of chickens as 'dumb', resting on the lives they lead in factory farm cages, are mistaken: 'Chickens have brains as good as any other bird, but we just don't allow them to develop it. They lead incredibly deprived lives. If you stuck humans in a stainless steel cage all their lives and didn't allow them to do anything or go anywhere, they wouldn't look too bright either.'

We would like to emphasize that this submission is not based on the evidence for intelligence in chickens and other farmed birds, but solely on these animals' sentience: their ability to feel pain and pleasure.

Vegan Australia suggests the those responsible for preparing the standard visit Edgar's Mission in Victoria and spend a few hours getting to know the stories behind the rescued farmed animals, especially the many chickens and other poultry, who live there as valued individuals.

Use of nutritional science

Science can also be used to show that humans have no need for farmed animal food products. In fact, there is a solid body of peer-reviewed scientific evidence to confirm that it actually benefits human health to consume a primarily plant-based diet. Changing to a plant-based diet can help people live a longer, healthier life, and significantly reduce risk of falling victim to many of the serious health threats facing Australians today.

Australia's peak health body, the National Health and Medical Research Council, recognises that a vegan diet is a viable option for all Australians. Australia's top health experts agree with those in other parts of the world that well-planned vegan diets are safe and healthy for all age groups. The Australian Dietary Guidelines state that alternatives to animal foods, such as nuts, seeds, legumes, beans and tofu, can "increase dietary variety and provide a valuable and affordable source of protein and other nutrients found in meats."

According to the US Academy of Nutrition and Dietetics, "Appropriately planned ... vegan diets are healthful, nutritionally adequate, and may provide health benefits for the prevention and treatment of certain diseases. These diets are appropriate for all stages of the life cycle, including pregnancy, lactation, infancy, childhood, adolescence, older adulthood and for athletes."

Not only are animal products unnecessary for optimal health, an increasing number of nutritionists and health professionals are acknowledging animal products are harmful to our health. This is supported by decades of good research. A healthy vegan diet helps

reduce the risk of heart disease, stroke, cancer, obesity, and diabetes, some of Australia's top killers.

A recent issue of the Medical Journal of Australia, dedicated to the question "Is a Vegetarian [including vegan] Diet Adequate?", included the following statements. "A varied and balanced plant-based diet can provide all of the nutrients needed for good health." "Most vegans meet the recommended daily intake for protein." "Vegan diets generally contain just as much or more iron than mixed diets containing meat." "BMI and obesity was lowest for vegans."

The China Study by T Colin Campbell is one of the most comprehensive studies on nutrition ever done. Campbell provides compelling evidence linking animal products to disease, including cancer, heart disease, osteoporosis, diabetes, etc.

Every current vegan, by simply being vegan, proves that causing harm to sentient farmed animals is not necessary.

Public support for avoiding unnecessary suffering of animals

Nearly all Australians believe that we should avoid causing unnecessary suffering to sentient beings as much as possible. As the draft standards state "animal welfare is becoming increasingly important to the general public."

While the document mentions that the standards "reflect community expectations", it does not specify what these expectations are, nor does it look at any surveys or research into this issue.

We note that, according to the 2017 Victorian Animal Welfare Action Plan, there is strong public support for the welfare of animals, stating that 98% of Victorians rate protecting the welfare of animals as important or very important and 75% feel the welfare of animals should be better protected.

In addition, a 2010 survey found that "99% of Australians are against cruelty to animals" and 72% "find killing male chicks unacceptable". The survey also found that 54% of Australians believe that vegan diets can be healthy. It also found that 56% of Australians say there are one or more things that would encourage them to become vegan, including evidence that many farming practices cause stress and pain for millions of animals every year and evidence they can be healthy on a vegan diet. (A Pound of Flesh, Vegan/Vegetarian Society of Queensland)

Other surveys have also shown that most people oppose testing cosmetics on animals. In fact, there is now widespread political support to outlaw the sale of all products tested on animals. The reform will bring Australia into line with Europe and New Zealand. Although in a different arena, this shows that when acceptable alternatives exist most people will choose compassion over cruelty.

The 2016 ban on greyhound racing in NSW is another example where the majority of people actively oppose the unnecessary suffering of animals. One of the major concerns of people is "wastage" - the majority of dogs who are killed because they are no longer fast enough to win. In other words, dogs are bred to be used for the trivial reason of entertainment and then killed. Most people rightly felt outrage when learning of this

practice. The parallels with animal farming are clear - farmed animals are bred to be used for the trivial reason of enjoyment of the taste of their flesh or secretions and they die in the process.

We also note the surveys mentioned in the draft report of the 2016 inquiry by the Productivity Commission into the regulation of agriculture: "A survey of Australians' relationships with animals found that '52 per cent of respondents thought that factory-farming methods of producing meat, eggs, and milk (which are becoming dominant trends) were cruel'" and "30 per cent thought that animals deserve the same rights as people to be free from harm and exploitation".

Most people agree that causing unnecessary suffering and death of any sentient being is wrong and we should not participate in it if we can avoid it. We believe that given the right information about 1) the sentience of animals, 2) the unavoidable suffering of animals in agriculture and 3) the scientific evidence that humans have no need for animal food products, then there will be widespread public support for the complete phasing out of animal agriculture, including the poultry industry, in Australia.

Community expectations and education

Vegan Australia agrees with the emphasis of both the draft standard and the Regulatory Impact Statement that animal welfare regulations should reflect community values and expectations. As indicated above, the community expects strong protection for animals. We also believe that the community needs to be more effectively educated about the suffering inherent in all poultry production systems, and about the fact that none of the products of the poultry industry are necessary for human health. The community must be fully informed in this area so they can make valid conclusions. Planning for this education should be part of the standards.

We propose that the standard include deliverables covering honest community education about animal agriculture and the lack of necessity for humans to consume animal products. The horrific realities of animal agriculture are unknown by many in the community due to the prevalence of miseducation beginning in childhood and continuing into adulthood. Some of this miseducation is perpetuated intentionally by supporters of the animal agriculture industry, however much of it is merely the passing on of falsities by well-meaning people. The situation is the same in the context of the belief that animal products are a necessary component in the human diet, despite this belief contradicting the Australian Dietary Guidelines and other major dietetic organisations globally. Failing to provide education informing Australians of the realities of animal agriculture and the lack of necessity of the consumption of animal products would result in a skewed community perspective.

This education is a prerequisite for gauging community values on animal welfare. Failing to do so would bias the process in favour of cruel and unnecessary practices that are not known about, or understood by, members of the general public.

The content of the education should be guided by the end goal of phasing out animal agriculture within ten years. No part of the education should lengthen this process by suggesting movements to intermediate "higher welfare" systems, such as cage-free eggs.

People's views can change rapidly when presented with new information. In the experience of Vegan Australia we have found that it can take as little as reading one book or seeing one video that can completely change people's attitudes to animals as food. Community awareness is growing and we expect it to accelerate.

At the moment, people's ethical concerns do not always match their consumption decisions. Many people believe it is unacceptable to deny the life and liberty of an animal without good reason but they continue to consume animal products. This behaviour is due to tradition, convenience, widespread promotion by the animal industries, lack of information about the treatment of farmed animals and lack of knowledge of non-animal alternatives. Vegan Australia believes that strong public education campaigns will be effective in rapidly changing people's understanding and behaviour.

Many people are misled by the purported welfare differences between caged, barn and free-range eggs. No matter what farming "system" is used to raise chickens and other birds, whether caged, barn or "free range", they all suffer throughout their short lives and they all die in a slaughterhouse at a fraction of their natural lifespan. The standards state that "all systems have disadvantages" and lists these issues. For example the 10 million layer hens kept in conventional cages are denied the freedom to express innate behaviours, while the 7 million kept on free range farms are exposed to higher risks and higher mortality due to predation, disease, extreme weather and cannibalism. One issue ignored by the standards is that, in all egg systems, male chicks are killed just after birth.

Animals are part of our 'community'

The standard often refers to making choices depending on what "generates the greatest net benefit for the community." The standard appears to ignore the fact that often people include animals as part of their community. This is most apparent for pets, who are often treated as part of the family.

We propose that farmed animals, including farmed poultry, also be included in the definition of 'community'. They are clearly sentient beings who value their own life and have an interest in continuing their existence and avoiding suffering. Including these animals as part of the community would mean that, when making decisions based on "the greatest net benefit for the community", the effect the options have of them would be included in the decision. Options which include their breeding and slaughtering are clearly not of benefit to them.

Food labelling as education

Consumers want to gain as much information about the products they are buying as possible. One of the aims of food labelling laws is to support consumer decisions about buying food products, including production processes. Misleading labels can result in consumers making choices that do not reflect their preferences.

Vegan Australia proposes that labelling of meat, dairy, eggs and other animal products must include an honest description of the suffering the animal endured during the production process. The current situation, where most labels contain no information about the treatment of the animals used in the production process, is deceptive and

likely to mislead potential buyers.

The proposed animal suffering descriptions should be detailed listings. An example that may suit egg products sold in Australia, describes the suffering endured by a typical hen in the egg industry:

- The eggs in this carton were taken from a hen.
- She had her beak painfully trimmed without pain relief.
- She had difficulty eating and drinking due to beak trimming.
- She was confined intensively and permanently in bare, dirty and overcrowded surroundings.
- She was deprived of natural light.
- She watched as her sick comrades were caught and killed.
- She was constantly pecked.
- She had no freedom.
- Her brothers were gassed or macerated when they were a day old.
- Her bones fractured because of her intensive confinement.
- She was bred for unnaturally high egg laying rates, causing her body to become exhausted.
- She was never able to raise any chicks, even though she laid eggs all her life.
- She suffered induced moulting.
- After she laid an egg almost every day, she was "depopulated" and trucked to a slaughterhouse.
- She was killed while she was still young, long before her potential lifespan.
- Because of the speed of the kill lines, she was not properly made unconscious and was scalded and cut open alive.

Another form of this labelling could use the model of cigarette packaging which has a graphic image and a warning in bold such as "Cigarettes kill" or "Quitting will improve your health" and on the side of the pack a more detailed description. This should level the playing field somewhat. We are incessantly bombarded with dishonest marketing to purchase animal products and that should be countered to allow consumers to make informed rational choices.

We also propose that honesty in labelling be extended so that pictures of "happy" animals on animal products, such as "happy hens" on egg cartons, be replaced with a graphic description how the animal suffered and died very young.

Market forces as a way to implement welfare improvements

The Regulatory Impact Statement mentions using market forces as a possible way to prevent animal suffering. This discussion is inappropriate. In no other area where the suffering of sentient beings (both human and animals) is in question would it be valid to allow the workings of the market to make choices. Even the Regulatory Impact Statement states that "Market signals will generally cause welfare standards to fall

below community expectations" and "there can be no expectation that market data for food products will ever provide a sufficient route to their measurement."

No input to poultry welfare standards from animal industries

In order to remove the possibility of conflict of interest, those responsible for preparing the Poultry Welfare Standards should only include those who represent animals and their interests. There should be no place for those who profit from the exploitation of these animals. To give representatives of the animal industries any say in the standards would continue the conflict of interest that occurs in the current ineffective process of setting animal welfare standards.

Currently most members of advisory groups developing standards are representatives of the agriculture industry and departments of primary industries, whose principal objective is promoting the agricultural sector. There is a clear lack of representation of the many Australians who realise that humans have no need to consume any animal products and so we should not be exploiting animals in any way. As the Productivity Commission draft report states "Animal welfare may be of secondary importance where the primary objective of the agency responsible for livestock welfare is to promote a productive and profitable agricultural sector." The report also mentions "concerns about significant input from bodies whose interests [are] described as 'essentially antagonistic' to those of animals."

Criticisms of calling for ending animal farming

While Vegan Australia has received good support for this submission and others like it, we have received some criticisms, such as: we are unlikely to get everyone to go vegan, we are unlikely to convince the Australian government to ban animal agriculture, it sets us up for failure and not being taken seriously and so we should strive for a more achievable goal.

By "more achievable goal", people usually mean advocating for some sort of better conditions for the animals who are suffering now. We expect there will number of excellent submissions to this inquiry on this topic and we in no way want to undermine those. However we would like to point out that there have been animal cruelty laws for about 200 years and yet the conditions most farmed animals suffer under now are worse than ever. Rather than regulating animal use, a better way is to stop using animals in the first place. To advocate for anything less is to sell the animals short.

While Vegan Australia is one of the only organisations currently calling for the phasing out of animal agriculture, we expect to be soon joined by others. By calling for an explicit acknowledgement in animal welfare laws of the end goal of ending all animal farming, we are sending a clear and consistent message to the public that suffering is unavoidable in any agriculture system that uses animals.

Support from the public for this submission

As mentioned above, Vegan Australia encouraged members of the public to make submissions calling for the end of poultry farming. At the time of writing, over 900 people had made such submissions. Some of the comments left by people signing the submission include:

- "Be kind, leave them all alone, because you can."
- "In a civilised society there is no need to use, abuse and exploit animals."
- "It is not necessary for us to eat animals in order to lead a happy, healthy and fulfilling life, there are millions of vegans who are testimony to that."
- "Animals are known to experience pain and trauma in the same manner that we do."
- "Given the incredible cruelty which chickens undergo, whether for egg or meat production, it would be ethical and appropriate to totally stop the farming of these birds."
- "It's 2018 we have no need to eat animals to survive!"
- "We have enough delicious plant food."
- "Why is ok to do this to animals that cant speak for themselves?"
- "Plant based diets are the future."
- "Compassion over cruelty."
- "Free the chickens."
- "There is nothing nice about any type of chicken or egg farming."
- "A barbaric, unnecessary industry that needs to come to an end."
- "Stop animal exploitation and stop farming animals because it is not necessary for human survival."
- "It's time for humans to evolve and stop exploiting animals. Go vegan. It's easy, healthy and no one has to suffer."
- "Stop it!! Just stop it!"

Summary

The aims of Vegan Australia are to help bring about a world where all animals live free from human use and ownership. In this submission we propose that the goal of the Australian Animal Welfare Standards and Guidelines for Poultry should be the complete phasing out of animal agriculture (including poultry) in Australia.

Animal welfare laws should not suggest "better" ways to debeak, induce moulting, intensively and permanently confine in bare overcrowded surroundings, deprive of natural light, catch, handle and kill by unskilled workers, castrate, breed for unnaturally high egg laying rates, breed chickens to grow so heavy their legs break, depopulate, inseminate, separate mothers and chicks, gas or macerate day-old chicks or slaughter at very young age (just six weeks for 'meat' chickens). They should state that none of these procedures should be necessary. They should give guidance on how to eliminate this industry and replace it with an industry based on compassion for animals, people and the earth.

Greg McFarlane

Vegan Australia