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Economy and
Infrastructure Committee

Pig welfare in Victoria

Inquiry

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About the Committee

Functions

The Legislative Council Economy and Infrastructure Committee inquires into and reports on any proposal, matter or thing concerned with agriculture, commerce, infrastructure, industry, major projects, public sector finances and transport.

The Committee consists of members of the Legislative Council from the government, opposition, and other parties.

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Terms of reference

Inquiry into pig welfare in Victoria

On 25 May 2023, the Economy and Infrastructure Committee agreed to the following self-referral motion:

That the Economy and Infrastructure Committee inquire into, consider and report by 31 May 2024 on farmed pig welfare in Victoria, in particular the Committee should consider —

- (1) the scope, application, compliance with and enforcement of relevant existing regulatory frameworks and their ability to promote pig welfare outcomes;
- (2) the ability of the most common methods used to stun pigs before slaughter (including electrical stunning and exposure to high concentrations of carbon dioxide gas) in Victorian slaughterhouses to minimise pain, suffering and distress and prevent injury, and available alternatives;
- (3) the outcomes of the 2017 industry-led phase out on the use of sow stalls;
- (4) current industry breeding and housing practices particularly the use of different forms of confinement;
- (5) international comparisons to determine industry adherence to best practice standards; and
- (6) any other relevant matter.

Chair's foreword

Pigs are one of the most remarkable animals on the planet. They are smarter than the dogs we share our hearts and homes with and have a similar cognitive ability to three-year-old children. They can comprehend, remember and empathise. They are clean, they nurture lifelong friendships and are strongly motivated to care for and protect their young.

They are also one of the world's most intensively farmed species. Their strong intellect is undoubtedly linked to their capacity to experience fear, distress, and pain.

In recent years, harrowing footage of pigs in Victorian factory farms and slaughterhouses has been released, resulting in increasing alarm from consumers towards the conditions animals are raised to be killed in.

Most recently, world-first footage was released of the most common stunning method before slaughter, CO₂ gassing systems. It showed pigs being lowered by a gondola into carbon dioxide across three Victorian slaughterhouses. Despite being described as 'best practice' by the industry, the vision showed pigs thrashing and gasping while slowly losing consciousness.

The passion for improved protection for pigs was evidenced by the engagement with this parliamentary inquiry, which received a combined 10,000 submissions and survey responses. Of those respondents, regardless of whether they consumed pork products or not, there was a consensus that industry and governments can and should do more to improve the lives of pigs in Victoria.

The codes of practice, regulations and legislation that govern pig welfare in Victoria are complex, with many different farms adhering to different levels and standards of care. A clear theme throughout the inquiry process was concern surrounding self-regulation. Despite the pork industry acknowledging pig cruelty and committing to a voluntary phase out of sow stalls by 2017, there are still farms that have not complied. Without oversight, consumers are misled into purchasing products they might falsely believe is sow stall free.

Another concern to many witnesses who gave evidence were so-called 'routine practices' regularly performed without pain relief, such as teeth clipping, ear notching and tail docking, mostly done on young piglets.

In this report, the Committee makes 18 recommendations to improve the welfare and protection of pigs including a complete and permanent ban on sow stalls and farrowing crates. It calls for mandatory CCTV in farming facilities to be made available for independent auditing and the establishment of an Independent Office of Animal Protection to appropriately and effectively monitor animal welfare. It acknowledges the inherent cruelty in CO₂ systems and recommends research into sustainable alternatives. As part of the solution to improving the welfare of pigs, this report also

recognises the innovation and development of the cultivated meat industry and its potential to provide safe, ethical and environmentally considered food to Victorians.

Many of these recommendations can be incorporated into the government's new and modernised animal protection laws in the Animal Care and Protection Bill. I encourage the Victorian Government to take up this legislative opportunity to ensure the plight of pigs is reduced.

As a final remark, it is clear that our growing population and its demand for protein has resulted in farming practices prioritising efficiency and production growth at the expense of animal welfare. It is imperative upon us all to reconsider our relationship with meat, and more so animals, and the extent of suffering we inflict upon them.

I would like to thank all stakeholders who made high quality and thoughtful submissions and those people who gave their time and expertise appearing before the Committee in public hearings to give evidence. We heard from pig farmers, animal advocates, welfare experts, veterinarians and more. The evidence received was of a high standard and significantly enhanced the Committee's understanding of this complex issue.

I would also like to thank my Committee colleagues for the professional and courteous way they approached the inquiry. This was a difficult inquiry for many, with strongly held views and different perspectives across Committee members. For the most part, there was a collegiate approach and collaboration. I greatly appreciate the way the Committee members conducted themselves throughout the inquiry.

Finally, I would like to thank the Secretariat of the Committee, Committee Manager Michael Baker, Inquiry Officers Ben Huf and Caitlin Connally, Research Assistant Adeel Siddiqi, Senior Administration Officer Julie Barnes and Administrative Assistants Sylvette Bassy and Jo Clifford, for the professional and exemplary support they have provided to the Committee throughout the inquiry.



Georgie Purcell MLC
Chair

Findings and recommendations

1 Introduction

FINDING 1: Whilst trespass remains a biosecurity risk there are no recorded incidents within Victoria where animal activists have harmed agricultural biosecurity. **11**

FINDING 2: The cultivated meat industry offers a potentially viable, ethical and environmentally sustainable alternative to traditional pork, with the exact molecular composition and taste of traditional pork. **13**

RECOMMENDATION 1: That the Victorian Government recognise the development of the lab grown meat industry in Victoria as having the potential to significantly contribute to the Victorian economy. **13**

3 The regulatory framework

FINDING 3: The pig industry plays a significant role in the development of legally enforceable animal welfare standards, giving rise to the perception that it is self-regulated. **46**

FINDING 4: In light of concerns around the transparency of Victoria's regulation and audit processes, inspectors under the *Prevention of Cruelty to Animals Act 1986* (Vic) and *Livestock Management Act 2010* (Vic) should be given the power to instigate unannounced and ad-hoc inspections. **55**

RECOMMENDATION 2: That the Victorian Government grant welfare inspectors the power to instigate unannounced and ad-hoc inspections of facilities. **55**

FINDING 5: In conjunction with other work done by the pork industry, mandating closed-circuit television in processing and farming facilities would increase transparency in the regulation and audit processes. **63**

RECOMMENDATION 3: That the Victorian Government impose mandatory closed-circuit television in all processing and farming facilities to be made available to regulatory bodies for independent audit(s). **63**

FINDING 6: Due to a delay in updating and replacing the national Model Codes of Practice for the Welfare of Animals, the *Victorian Standards and Guidelines for the Welfare of Pigs* is outdated. 70

RECOMMENDATION 4: That the Victorian Government participate and contribute to updating and replacing the 2008 *Model Code of Practice for the Welfare of Animals—Pigs* through the Australian Animal Welfare Standards and Guidelines process. 70

FINDING 7: The decision-making principles proposed in the Victorian Government’s initial plan for Victoria’s new animal care and protection laws would have improved decision-making outcomes for animal welfare. 74

RECOMMENDATION 5: That the Victorian Government include decision-making principles in the new Animal Care and Protection Bill in relation to the development and adoption of animal welfare standards and guidelines in Victoria. 74

FINDING 8: An independent, appropriately funded statutory authority has the potential to significantly improve outcomes for farmed pigs in Victoria. 77

RECOMMENDATION 6: That the Victorian Government consider the establishment of an Independent Office of Animal Protection to ensure compliance with animal protection laws, streamline complaints, provide expert, evidence-based reform, and monitor animal welfare conditions within Victoria 77

4 Stunning methods before slaughter

FINDING 9: CO2 gassing as a method of stunning is aversive to pigs who experience high levels of pain and stress. 87

RECOMMENDATION 7: The use of side-loader (single file) carbon dioxide stunning systems must be phased out to minimise pre-slaughter stress in pigs. 95

RECOMMENDATION 8: That the Victorian Government work with industry to innovate research and development opportunities to commercially viable alternatives to the use of CO2 in stunning pigs prior to slaughter and report on alternatives with a reporting date no later than May 2026. 97

5 Confinement practices

RECOMMENDATION 9: That the Victorian Government mandate reporting on the methods of procurement and extraction of semen from boars, and the frequency of each boar used, the method, dates, and frequency of the artificial semination of each sow.

101

FINDING 10: The Victorian pork industry is yet to fully comply with their volunteer phaseout of the use of sow stalls, set to be complete by 2017.

104

FINDING 11: The Committee considers that the voluntary phasing out has not worked and that legislation is required to ensure they are removed from the industry completely.

107

RECOMMENDATION 10: That the Victorian Government legislate a complete ban on the use of sow stalls.

107

FINDING 12: The close confinement and isolation of sows within farrowing crates leads to stress, discomfort, poor muscle development and prohibits maternalistic behaviours.

113

FINDING 13: Evidence presented to the Committee indicates that mortality rates in piglets that are confined to farrowing crates are similar compared to those that are pasture raised.

113

RECOMMENDATION 11: That the Victorian Government support farmers to transition to outdoor group housing.

113

RECOMMENDATION 12: That the Victorian Government legislate a complete ban on the use of farrowing crates.

113

RECOMMENDATION 13: That the Victorian Government mandate a complete ban on the use of boar crates, mating stalls and any other restrictive confinement.

115

RECOMMENDATION 14: That the Victorian Government support a national standards framework including enforceable welfare guidelines.

118

6 Other welfare issues

RECOMMENDATION 15: That the Victorian Government work with industry to find an alternative to the use of blunt force trauma as a suitable method of piglet euthanasia. **125**

RECOMMENDATION 16: That the Victorian Government mandate straw bedding substrate to stimulate natural pig behaviours to prevent injury and abrasion. **127**

RECOMMENDATION 17: That the Victorian Government investigate enrichment aids for farmed pigs for inclusion in the Animal Care and Protection Bill. **127**

FINDING 14: Biodiverse farm systems and genetic diversity reduce disease spread on pig farms. **132**

RECOMMENDATION 18: That the Victorian Government require industry to implement the regular surveillance monitoring and public reporting of antibiotic use on Victorian farms. **132**

What happens next?

There are several stages to a parliamentary inquiry.

The Committee conducts the Inquiry

This report on the Inquiry into pig welfare in Victoria is the result of extensive research and consultation by the Legislative Council Economy and Infrastructure Committee.

The Committee received written submissions, spoke with people at public hearings, reviewed research evidence and deliberated over a number of meetings. Experts, government representatives and individuals expressed their views directly to us as Members of Parliament.

A Parliamentary Committee is not part of the Government. The Committee is a group of members of different political parties (including independent members). Parliament has asked us to look closely at an issue and report back. This process helps Parliament do its work by encouraging public debate and involvement in issues.

You can learn more about the Committee's work at: <https://new.parliament.vic.gov.au/get-involved/committees/legislative-council-economy-and-infrastructure-committee>.

The report is presented to Parliament

This report was presented to Parliament and can be found at: <https://www.parliament.vic.gov.au/get-involved/inquiries/pigwelfare/reports>.

A response from the Government

The Government has six months to respond in writing to any recommendations made in this report.

The response is public and put on the inquiry page of Parliament's website when it is received at: <https://www.parliament.vic.gov.au/get-involved/inquiries/pigwelfare/reports>.

In its response, the Government indicates whether it supports the Committee's recommendations. It can also outline actions it may take.

Chapter 1

Introduction

1.1 Terms of reference

On 25 May 2023, the Economy and Infrastructure Committee agreed to the following self-referral motion:

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- (1) the scope, application, compliance with and enforcement of relevant existing regulatory frameworks and their ability to promote pig welfare outcomes;
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- (3) the outcomes of the 2017 industry-led phase out on the use of sow stalls;
- (4) current industry breeding and housing practices particularly the use of different forms of confinement;
- (5) international comparisons to determine industry adherence to best practice standards; and
- (6) any other relevant matter.

On 13 May 2024, the Committee resolved to extend the tabling date for the report to 20 June 2024.

1.2 Conduct of the Inquiry

The Committee wrote to key stakeholders in November 2023 seeking submissions by 12 January 2024. In addition, the Committee advertised the Inquiry in early December 2023 seeking public submissions. The Committee also published a survey seeking input from members of the public who wished to contribute their views to the Inquiry but who did not necessarily wish to make a personal submission. The survey was completed by 6,639 people. In all, nearly 10,000 people had input into the Inquiry

1.2.1 Submissions

The Committee received 3,045 submissions, some of which were pro forma submissions using similar wording. The Committee accepted each of these as individual submissions. The submissions ranged from one paragraph to more than 50 pages and were from interested individuals, major organisations within the agricultural industries, government agencies and animal welfare organisations. A full list of submitters to the Inquiry is included in Appendix A of this report. The submissions are published on the Inquiry webpage at <https://www.parliament.vic.gov.au/get-involved/inquiries/pigwelfare/submissions>.

As a result of the very large volume of submissions, which all had to be read and processed, the submissions had to be published on the website progressively. This led to there being a necessary time lag between the submissions being received and published. The Committee appreciated the community's patience as they waited for submissions to be published.

The Committee is very grateful for the time and effort community members put into their submissions and this report relies heavily on their input.

1.2.2 Survey

The Committee also published a survey on its Inquiry webpage which was designed to give people an opportunity to express their views without going to the trouble of preparing a substantive submission.

The Committee would like to stress that the survey was not a random opinion poll of the Victorian population regarding pig welfare, the practices involved in processing animals for meat or any other element of the Inquiry. It simply represented a way for people with an interest in the Inquiry to express a view without needing to provide a submission. As such, respondents are a self-selecting group and represent the views only of people with a specific interest in the issues under examination.

Therefore, the Committee does not make any assumptions about general community attitudes based on the survey results and considers that any such assumptions are likely to be misleading.

Some of the snapshots of the survey results are provided below.

While there were respondents from all over Victoria, the largest response rate was from metropolitan Melbourne. Nearly half of all respondents came from outside of Victoria.

Demographic data suggested the largest age group responding to the survey were people aged between 55 and 64. More than half of the respondents were over 45 years old.

Figure 1.1 Geographic location of Victorian respondents to the survey

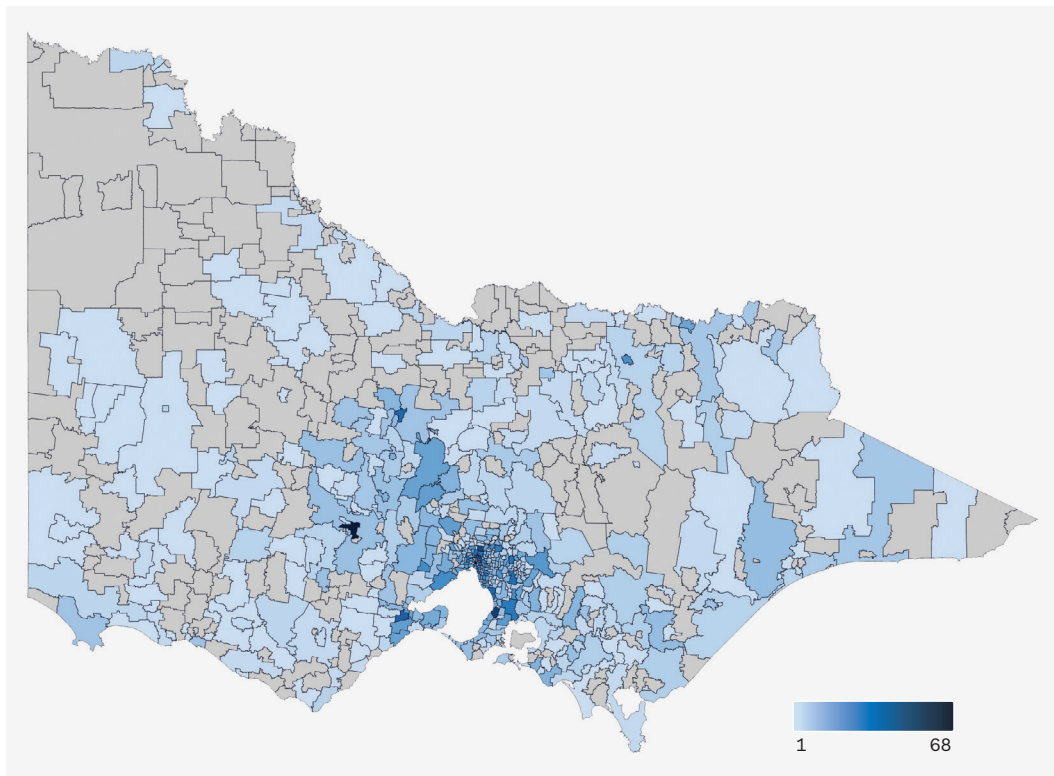
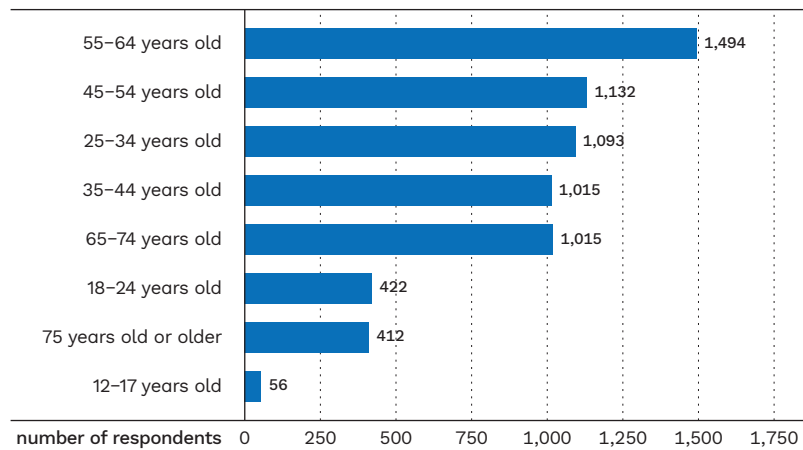
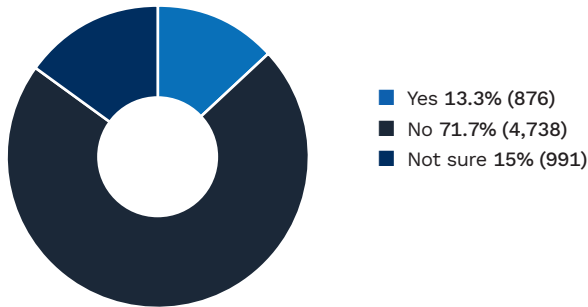


Figure 1.2 Age range of respondents to the survey



As can be seen by the graphic below, a significant majority of respondents to the survey (71.7%) did not believe that animals should be killed to provide food for humans.

Figure 1.3 Survey response to the question ‘Do you believe animals should be killed to provide food for humans?’



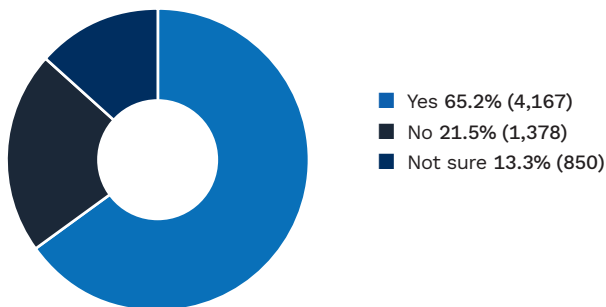
The results in Figure 1.3 indicate that vegetarians or vegans responded to the survey in greater numbers than those that support meat eating. As vegetarians and vegans are still a minority of the general population, this simply illustrates the need to treat the results of the survey with some caution and not extrapolate the data to make assumptions about general attitudes.

However, notwithstanding the limitations of the survey results, there are some interesting indicators that may be useful.

Figure 1.4 below suggests that of the people that do support animals being killed to provide food for humans, a significant majority (65.2%) said they would be prepared to pay more for pork products if the industry advanced practices with better welfare outcomes.

This result would indicate that even amongst people who approve of the killing of animals for food, they are concerned about any suffering by the animals and would be prepared to pay more if they could be assured that the suffering of the animals is minimised. This is consistent with much of the evidence provided to the Committee during the Inquiry which indicated for many people the mitigation of the suffering of animals is important.

Figure 1.4 Survey response to the question ‘Would you be prepared to pay more for pork products if the industry advanced practices with better welfare outcomes?’



On the issue of the use of carbon dioxide to stun pigs prior to slaughter, the results of the survey were largely unequivocal, with 91% of respondents stating that they do not support the use of carbon dioxide gas as a way of stunning pigs prior to slaughter. Again, this figure includes those opposed to the killing of animals for food.

More than 80% of respondents said they were aware of or had witnessed footage or images of stunning methods on pigs prior to slaughter. A substantial majority (74.74%) said they did not believe that the practice reduced the pain and suffering and distress of the animals. These figures include those that do not support the killing of animals for food for humans. It is unknown whether footage shown on 7.30 on the ABC had any influence on these views or on the high percentage of people who knew of the practice.

On the issue of confinement practices within the pork industry, results were again unequivocal. More than 90% of respondents indicated that they were aware of or had witnessed footage or images of the confinement methods used on pigs in Victoria. The vast majority of respondents did not consider that the current confinement methods promote positive welfare outcomes for pigs.

Because of the self-selecting nature of respondents, the Committee does not ascribe the views expressed to the wider population and makes no findings in relation to the survey.

1.2.3 Public hearings

In addition to submissions, the Committee held a series of public hearings. Due to the very substantial number of submissions received, the Committee had to be very selective about who it heard oral evidence from in three days of public hearings on 12, 13 and 26 March 2024. The Committee took evidence from major animal welfare groups, key pork industry organisations and individual producers and government, animal welfare organisations and research organisations. The list of witnesses appearing in public hearings is included in Appendix A of this report.

The Committee would like to thank all witnesses who appeared before it in public hearings and acknowledge that the evidence given has been critical in informing this report.

1.2.4 Definitions of animal welfare

It is important for the Committee to acknowledge that while the focus of this Inquiry is clearly pig welfare, what that means is defined differently by various stakeholders. As can be seen in the survey results, some of the animal welfare groups and individual submitters believe that animals should not be killed for food for humans. Therefore, the farming and slaughtering of pigs for food is itself a breach of animal welfare.

Evidence given by the pork industry and farmers, on the other hand, define animal welfare in terms of the quality of the animals' lives, and ultimately death, in the context of their being bred as a source of protein for humans.

A detailed examination of the legislative and regulatory underpinnings of the industry is undertaken in Chapter 3. However, for the purposes of this section it should be noted that in section 9 of the *Prevention of Cruelty to Animals Act 1986* (POCTA) a person commits an act of cruelty if he or she does certain things to animals that cause pain or distress, including wounding, torturing, abusing, unreasonable loading or confinement.

The comprehensive list of actions that constitute cruelty can be found in the Act. However, the list does not apply to farmed animals as they are exempted by a later section of the Act. These issues are discussed in detail in Chapter 3. Suffice to say that POCTA is considered by a number of contributors to this Inquiry as of little value in protecting the welfare of farmed animals.

While definitions of cruelty can vary according to these very different perspectives, it is reasonable to assert that no submitters or witnesses to this Inquiry overtly or explicitly supported cruelty to animals. Some of the pig farmers the Committee heard from see the care for their pigs as a business decision but that does not mean they do not care about the animals.

Mr Martin Clark told the Committee that:

Without us having healthy pigs and us looking after our pigs we do not have a business – I do not have a business – so it is vital for us that we are best practice at what we do, we are sustainable in what we do and our people are trained so we get the full benefit of the knowledge and making sure we are best practice.¹

While it is clearly in his businesses interests for the pigs to be cared for, Mr Clark outlined for the Committee some of the practices that he adopts on his farm. He said:

We rely on the nutritionist. Our vet is there every two months. Any issues, they are there within a day. Pigs are much like us as humans. They get a cold, they get viruses, all that sort of stuff, so it is utmost that we look after the health of them. I heard earlier about nipping teeth and tails. We do not do any of that. Our pigs are bred free range. They are out in the mud. We take them at 21 days, 22 days old into a straw-based Eco shelter where they are fed and looked after, and from there when they get to about 10 weeks of age we then take them up to a bigger grow-out at Bridgewater where they have got more space.²

Animal welfare groups, on the other hand, tended to have a different definition of cruelty. The specific issues of CO2 stunning, and some practices such as tail docking and teeth clipping without anaesthetic, are addressed in detail in Chapters 4 and 6 respectively.

Notwithstanding that for some welfare groups the killing and eating of animals in itself is cruelty, this is not a universally held position. It is largely the process involved in the slaughter of animals for food that has been the focus of much of the evidence given to the Committee.

¹ Martin Clark, Murnong Farming, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 51.

² Ibid.

In a response about perspective differences between vegetarians and meat eaters and if views about animals suffering are tied to a belief that we should not eat meat, Shatha Hamade of Animals Australia said:

That is not true. That is really not true, because what you are effectively saying is that if you eat meat you agree that piglets should have their tails cut off and their teeth removed without anaesthetic. These things are not mutually exclusive. People that eat meat care about animals. What they do not accept is what you are seeing happening in current husbandry and killing practices in the pig industry. It is not right, and that is offensive to people that eat meat. We looked at the submissions that came through – countless submissions – by meat eaters who are not accepting of what is going on and who are demanding change and evolution. It is not an us and them.³

Dr Jed Goodfellow of Australian Alliance for Animals, an animal welfare charity which was established in 2022 to bring together six of Australia’s leading animal protection organisations, told the Committee that:

it is the routine and legal practices that cause the greatest quantum of suffering to animals. These include extreme confinement systems which prevent these intelligent, inquisitive and sentient animals from even be able to turn around let alone engage in any kind of normal behaviours and the various bodily mutilations such as tail docking, castration, teeth clipping and ear notching undertaken without any form of pain relief.⁴

Dr Goodfellow suggested that these concerns were in no way restricted to the vegetarian/vegan population but that:

Australians care about animal welfare, and they do not agree with practices that cause distress and suffering to animals. Poll after poll, survey after survey, has shown that Australians oppose such practices, so there is clearly an evident gap here between what the law permits on the one hand and what the community expects on the other.⁵

The focus of the Inquiry throughout has been directly related to pig welfare in relation to the farming and processing of pigs for the production of meat. The Committee is acutely aware that there are diverging views, often very strongly held, about whether or not pigs, and by extension other animals, should be killed for food for humans. These views were expressed during the hearings and in the submissions. It is unlikely that this report will substantially change these views.

Therefore, it needs to be stated at the outset that this Inquiry is not about whether or not animals should be killed and eaten by humans. The Inquiry is about the humane treatment or otherwise of animals in the process of producing food. It is hoped that findings and recommendations will lead to improved welfare outcomes within the pork producing industry.

³ Shatha Hamade, Legal Counsel, Animals Australia, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 56.

⁴ Dr Jed Goodfellow, Co-Founder and Director, Policy and Government Relations, Australian Alliance for Animals, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 2.

⁵ Ibid.

1.3 Scope of the Inquiry

During the course of the Inquiry issues have been raised that are not directly related to the welfare of animals but may be significant issues in themselves.

The Committee is cognizant that a significant inquiry was completed in 2020 that addressed some of these issues in detail. The Economy and Infrastructure Committee's Inquiry into the impact of animal rights activism on Victorian agriculture covered a number of issues outside animal welfare that is the focus of this Inquiry. Below is a brief summary of some of the key issues addressed in that Inquiry. It is not the intention of the Committee to re-prosecute these issues in this report.

1.3.1 Issues raised in the 2020 Inquiry into the impact of animal rights activism on Victorian agriculture

The Inquiry into the impact of animal rights activism on Victorian agriculture tabled its final report in February 2020.

This Inquiry focused on the effectiveness of legislation and other measures to prevent and deter activities by unauthorised persons on agricultural and associated industries, most commonly trespass by animal activists on farms to film and publicise what they saw as cruel practices. The Committee's report considered the three main methods animal rights activists use to search for evidence of animal cruelty and publicise what they find, including:

- 'open rescue'
- covert actions
- overt actions.

It also undertook an analysis of the motivations that drive the activists to trespass on farms and other animal processing facilities. The report considered whether the actions of activists should be considered a form of civil disobedience, what impact the actions of activists had on farms and other businesses, the divide in attitudes to animal production methods between urban and rural communities and how effective is the legislation and enforcement regimes in relation to animal activist actions and animal welfare issues. The report also covered in some detail the issue of biosecurity risks posed by the illegal trespass on farms and made a number of findings and recommendations regarding this issue.

The Animal Activism report made 15 recommendations and 12 findings. Recommendations included that the Victorian Government consider the implementation of closed-circuit television cameras (CCTV) in Victorian abattoirs, and conduct an examination of alternative practices around the use of blunt force trauma on pigs. The report also made recommendations concerning the general standards in animal welfare, which would address a range of issues of concern in this report, including tail docking and teeth clipping without pain relief.

The Inquiry was thorough and involved more than 500 submissions and hearings held over several months, in both Melbourne and across regional Victoria.

The report can be accessed at: <https://www.parliament.vic.gov.au/49498f/contentassets/184245b7cfef487b9e24cfd01302f172/inquiry-into-the-impact-of-animal-activism-on-victorian-agriculture.pdf>.

While this report touches on some of the same issues as the Animal Activism Inquiry, it is focused on specific areas of pig welfare. It is not the Committee's intention to re-prosecute the previous Inquiry.

Nonetheless, a couple of key points overall should be made in recognition of some concerns raised during the Inquiry. Firstly, the Committee acknowledges that footage made public prior to the public hearings and subsequently shown during the hearings was obtained illegally by animal activists who had trespassed on private land. This was freely admitted by the activists during the public hearings. The Committee does not condone these activities. However, the Committee considers that steps should be taken to make them unnecessary to ensure transparency in the industry. In the Committee's view, mandatory CCTV should be placed in all processing and farming facilities and the footage should be audited to ensure compliance with animal welfare requirements. The issue of mandatory CCTV is considered in Chapter 3.

1.3.2 Biosecurity

One of the areas of concern raised in submissions and by witnesses from the farming and pork industries related to the concerns around the biosecurity risks of farm trespass. As stated above, this issue was covered in some detail in the previous Inquiry. However, as it was raised by a number of submissions and witnesses during this Inquiry, the Committee considers it appropriate to address it briefly here.

The Chief Executive Officer of Australian Pork Limited, Margo Andrae, told the Committee in a public hearing that the industry takes the issue of biosecurity extremely seriously:

The industry lives and breathes biosecurity, so you cannot just walk onto a pig farm in this country, because of the fact that we and packages carry diseases. Whether it is African swine fever, or we saw Japanese encephalitis virus coming through on mosquitos, our pigs are highly susceptible to disease and to other factors, so biosecurity is number one.⁶

Ms Andrae said that as an island Australia has so far been fortunate in not having exotic disease outbreaks but it is essential that keeping diseases out of the country remains a top priority. In addition to border controls, she said that ensuring individual farms are protected is also vital:

[A]nd that is for everything, from who walks on there, what parcels come on. You shower on and shower off for a lot of our farms, so we are incredibly protective

⁶ Margo Andrae, Chief Executive Officer, Australian Pork Limited, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 10.

around that. That is why some of the illegal activity does actually pose such a threat as well.⁷

Ms Andrae stressed that the illegal trespass by animal activists represents a threat to biosecurity, as well as to the animals and the people working on the farms. She said:

Our livelihoods are put at risk through these biosecurity breaches and repeated attempts to disrupt our operations, but make no mistake, these illegal activities are endangering the wellbeing of our animals and our people.⁸

This view was reiterated by Dr Robert van Barneveld, group Chief Executive Officer and Managing Director of SunPork Group, who told the Committee in a public hearing that attempts to mitigate the risk of biosecurity breaches by animal activists were inadequate and posed a risk. He said:

... wearing disposable overalls in no way represents compliance with or awareness of a biosecurity system. All farms have different health statuses, and without knowledge of this you will be invariably putting all pigs on that farm at risk. If a disease outbreak was to occur, then you will see a tremendous animal welfare travesty. Under Victorian law, any uncontrolled entry of a person, vehicle or equipment without permission is a biosecurity breach and should be prosecuted.⁹

Judy Croagh, Chief Executive Officer of Western Plains Pork, told the Committee that there are quite stringent measures to mitigate against biosecurity breaches on pig farms. She told the Committee in a public hearing:

Biosecurity is also of the utmost importance. Because of the way we produce our pigs alongside farms with sheep and cattle we are mindful of protecting not only our pigs but the other animals farmed in the area. When any of us travel overseas, we are not allowed back onsite for five to seven days, with all clothing, footwear and suitcases cleaned with disinfectant, which the company provides.¹⁰

The biosecurity issue was also raised by smaller pig producers as one of the concerns about illegal trespass. Martin Clark, a pig producer from the western district of Victoria, told the Committee that they have strict processes to reduce biosecurity risk on their farm:

Biosecurity is a big thing for us, and it is getting bigger ... So we are trying to ensure that we have got a sustainable business, our staff and everything are well trained and we manage the biosecurity ... We have barriers where any transport trucks coming or going do not actually enter the piggery. It is all quarantined. The truck will pull up to one side of the fence and hook his hose up to fill the silo. The workers and that are on the other side. We have got showers and toilets and all that, so there is no risk of diseases or them catching a cold, so to speak, where we can keep best practice.¹¹

7 Ibid.

8 Ibid., p. 3.

9 Dr Robert van Barneveld, Chief Executive Officer, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 38.

10 Judy Croagh, Chief Executive Officer, Western Plains Pork, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 49.

11 Martin Clark, *Transcript of evidence*, p. 51.

Tammi Jonas, a pig farmer and president of the Australian Food Sovereignty Alliance, acknowledged that illegal trespass is an issue for indoor pig production. However, she suggested that intensive animal farming poses a greater threat to biosecurity and called for a move away from these systems:

There is a lot of concern around biosecurity that is brought into an animal welfare inquiry, and we would argue that biosecurity is often used as a kind of obfuscation. I understand there is a real problem of illegal trespass onto shedded pig operations, and we do not condone trespass. However, biosecurity risks have been rising with the rise of intensively produced livestock. Many novel forms of influenzas are coming out of sheds, and we would say that that kind of biosecurity approach comes from the very production model itself. We would advocate for systems like the ones that we operate where animals are out in biodiverse environments, where there is a much more resilient kind of ecosystem to support their immune systems, and that that is how we could get away from the biosecurity concerns. It also means less people are likely to invade your farm, because you are not confining animals in sheds. I think that is another aspect of it.¹²

Regarding the need to increase biodiversity, Ms Jonas elaborated that:

One of the most important things we can do is have more biodiverse systems. We have narrowed the genetic base and that is creating further risks in the food system generally, but one of those is risk of disease transmission. If a pathogen finds a host and next door is a nearly identical host, then the transmission rate is much higher. And, as Claire [O'Brien] already said, if they are confined really close together in poor air quality with poor microbiomes, all of those things combined mean that we see the increase of disease spread and the increase of AMR. So moving animals further apart, looking for more genetic diversity, healthier production environments – that is how we are going to stop those kinds of disease risks.¹³

It should be noted that evidence presented to the Committee suggests that to date there have been no biosecurity outbreaks incidents within the Victorian pork industry as a result of animal activist trespass.

FINDING 1: Whilst trespass remains a biosecurity risk there are no recorded incidents within Victoria where animal activists have harmed agricultural biosecurity.

The Committee understands that the illegal trespass on farms and meat processing facilities does represent a biosecurity risk. However, as this issue was covered in detail in the previous Inquiry and is not within the terms of reference of this Inquiry, it does not make any findings or recommendations here. The issue is instead addressed indirectly later in the report in discussions about transparency within the industry. It is the Committee's view, and one that is supported by the activists who undertake the

¹² Tammi Jonas, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 61.

¹³ *Ibid.*, pp. 69–70.

illegal trespass activities, that the use of CCTV in farms and abattoirs, and the appropriate access to the footage from that CCTV, would obviate any need for trespass and would resolve the issue of biosecurity risks from illegal trespass.

1.4 Cultivated Meat

One of the issues raised during the Inquiry that was not directly related to the key animal welfare issues identified in the terms of reference, but which clearly has substantial implications for both the industry and animal welfare in the medium to long term, is the development of cultivated meat.

The Committee was interested to hear evidence about the developments in laboratory or cultivated grown meats that are not ‘fake’ meat but are real meat grown in a laboratory.

At a public hearing, Paul Bevan of Victorian company Magic Valley explained the process to the Committee. The process begins by taking some skin cells from a living animal, which is a painless process of just a scraping of the ear. Those cells will be taken from the pig, who will go on living its normal natural life.

Those cells are then taken into the laboratory. They are reprogrammed into a particular type of stem cell, which is called an induced pluripotent stem cell. That type of stem cell is important because it can become any cell or tissue type in the body, so primarily muscle and fat, but it could be bone, blood, connective tissue or liver.¹⁴

Mr Bevan said of the process:

We are basically just replicating practices that are already used in the life sciences industry and have been used in that industry for 10 to 15 years. We add nutrients to those cells to get them to grow. Typically, they are amino acids, glucose and some growth factors.¹⁵

No other animal products are used in the process.

The process contains the cells in a bioreactor which is like a large vat – and they multiply in there. The cells do not have any scaffolds, so they do not have to attach to anything. They will attach to themselves and form spheroids or aggregates.

The muscle and fat are grown in the reactors. At the end of that process the cells are harvested for the mincemeat product that has been created. Some plant-based materials are added and the meat is ready for consumption.¹⁶

Mr Bevan told the Committee that the development of the product, which is still in the research and development stage, has not only animal welfare benefits, but

¹⁴ Paul Bevan, Founder and Chief Executive Officer, Magic Valley, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 25.

¹⁵ Ibid.

¹⁶ Ibid.

environmental benefits, including in climate change mitigation and air pollution, and in long term cost savings.

He told the Committee in a public hearing:

Just talking about the overall market, I guess in terms of cultivated pork in particular – we have developed both a cultivated pork and a cultivated lamb product – it varies between species obviously in terms of the impact that you have on the environment and sustainability. For pork we are looking at 44 per cent less greenhouse gas emissions than traditionally farmed pork. We use 67 per cent less land. There is actually a very large reduction in the threat of biological risk and disease, because obviously what we are doing is in a sterile environment. There is 42 per cent less air pollution. It is 4.6 times more efficient feed conversion in terms of the end product, and if we were to look globally, we would be able to spare 1.5 billion pigs.¹⁷

Mr Bevan did acknowledge that the development of the product to be a replacement for traditionally produced pork is a long way away:

I think that is going to take decades. I do not think that is going to happen anytime soon. Obviously, we are still quite an early industry in terms of scale and in terms of where we are at. We are only still producing small quantities. Once we get into a manufacturing facility, what we have mapped out is basically – I am not sure how well people will be able to relate to these quantities – two 20,000-litre reactors. If you think of a water tank, it is probably about 2000 litres, so it is probably about 10 times the size of that. If we had two of those in, say, a 150 or 200 square metre facility, from that we would be able to produce probably just under 5 million kilos per annum. That is probably about 1 per cent of the amount of pork that is eaten in Australia per annum. We would need 100 of those to match that, and so we are obviously still quite a way away from that. We could potentially scale up to that, obviously.¹⁸

The Committee acknowledges that the development of cultivated or laboratory grown meat is not going to be completed overnight and that the traditional farming process will be the main way of providing meat for the immediate to medium term future. However, the processes and products being trialled by Happy Valley and other companies is a very interesting development and should be supported by government.

FINDING 2: The cultivated meat industry offers a potentially viable, ethical and environmentally sustainable alternative to traditional pork, with the exact molecular composition and taste of traditional pork.

RECOMMENDATION 1: That the Victorian Government recognise the development of the lab grown meat industry in Victoria as having the potential to significantly contribute to the Victorian economy.

¹⁷ Ibid.

¹⁸ Ibid., p. 28.

Chapter 2

The pig industry in Victoria

2.1 Introduction

The Victorian pig industry has transformed in recent decades. Pork consumption per capita has increased significantly as a more affordable protein alternative to more expensive red meats, leading to both increased production and pig product imports.

This chapter overviews these recent changes. Such an analysis is relevant to this Inquiry for two reasons. First, accounting for such changes helps illustrate how Victorian consumers and Victorian farmers are implicated by the animal welfare issues examined in this report.

Second, increasing pork consumption and production have been accompanied by significant changes in farming, husbandry and slaughter practices with the shift from small-scale and free-range pig farming to large-scale, intensive, indoor farming. The Committee received considerable evidence – detailed in later chapters – highlighting the relationship between changes in farming size, husbandry practices and animal welfare.

2.2 Trends in pork consumption in Victoria

2.2.1 Pork consumption

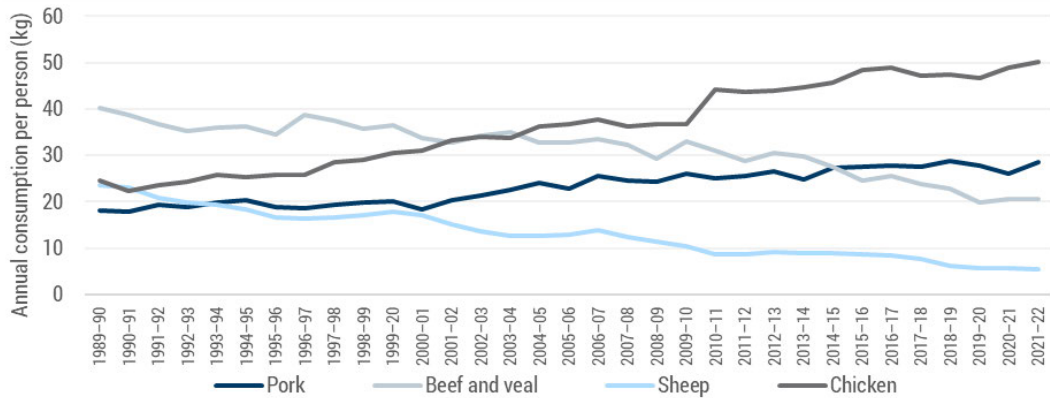
Pork products are the second-most consumed meat in Australia after chicken, with Australians consuming an average of 26.6 kg of fresh pork and processed meats each year.¹

This situation reverses patterns from two decades ago. Together with chicken, pork has replaced red meat as the most consumed meat in Australia. Since 2000 beef consumption has dropped 41% from 37.5 kg per annum per person to 22 kg in 2020. Sheep meat consumption has declined 48% from 12.5 kg per person per year in 2000 to just 6.5 kg in 2020. Chicken consumption has increased 50% from 31.1 kg in 2000 to 46.9 kg in 2020. Pork consumption has gained 35% from 19.6 kg to 26.5 kg over the same period.²

¹ Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 5.

² Thomas Elder Markets, *State of the Industry Report 2021*, Australian Pork Limited, 2021, p. 18.

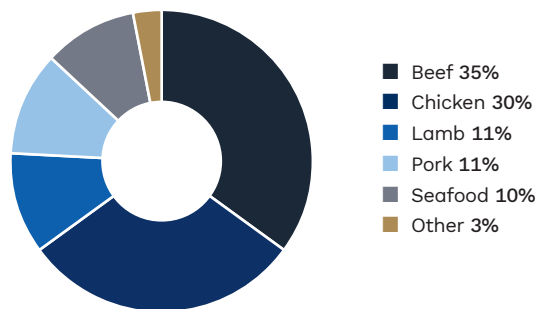
Figure 2.1 Meat consumption per person in Australia, 1989–2022



Source: Victorian Parliamentary Budget Office, *Submission 432*, p. 6.

Pork consumption has grown in large part because it is a more affordable protein compared to other meats.³ Beef, despite the decline in market share, remains the largest retail meat spend on value. According to a 2021 Australian Pork Limited report, 35% of Australia’s retail meat spend is on beef. Chicken, which is a high volume and low value transaction, attracts 30% of Australian retail meat spend, and lamb and pork around 11% retail spend each. Pork is consumed at a higher per capita volume than lamb but at a lower retail price.⁴

Figure 2.2 Fresh meat retail market share by value – Australia



Source: Thomas Elder Markets, *State of the Industry Report 2021*, Australian Pork Limited, 2021, p. 20.

2.2.2 Sourcing pig products for consumption in Australia

According to the Victorian Parliamentary Budget Office (PBO), Australians consume around 65% of pork as processed meat and 35% as fresh meat. Processed meats are mainly ham and bacon which are preserved, while fresh meat is not preserved.⁵

³ Victorian Parliamentary Budget Office, *Submission 432*, p. 6.

⁴ Thomas Elder Markets, *State of the Industry Report 2021*, p. 20.

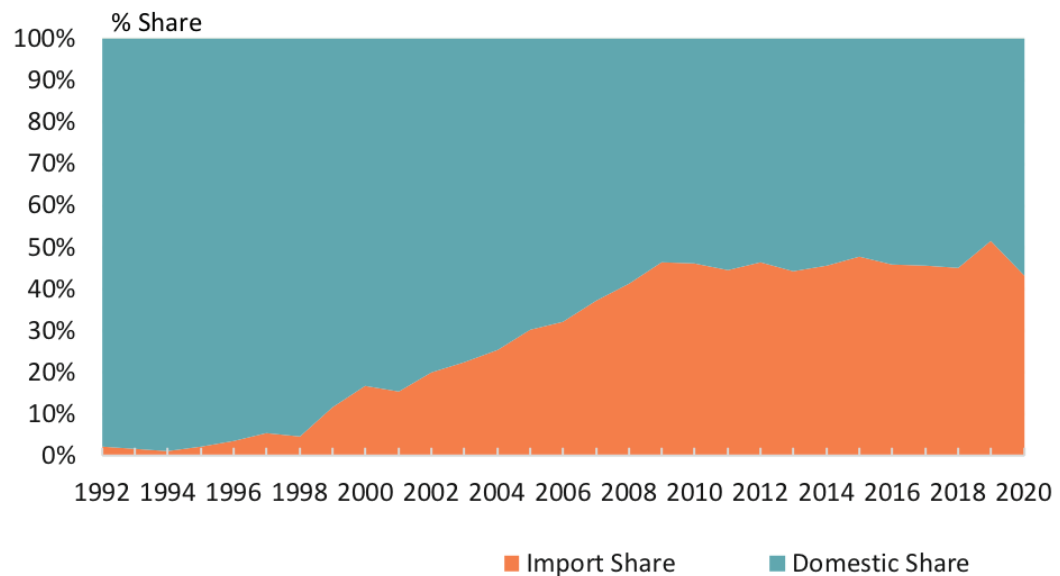
⁵ Victorian Parliamentary Budget Office, *Submission 432*, p. 6.

Australia does not produce enough pig meat to supply its own demand. The supply of pork products can be summarised:

- All fresh pork consumed in Australia is produced locally. The fresh meat market represents over one-third of the entire pork meat market today.⁶
- Approximately 75–80% of Australia’s processed or small meats are imported, approximately 200,000 tonnes per year.⁷ Local producers only supply around 25% of this market.⁸
- Approximately 90% of Australia’s pig meat production is consumed locally. The remaining 10% is exported generating \$173 million for the national economy.⁹

In its 2021 State of the Industry report, Australian Pork Limited tracked increases in imported pork as a share of total domestic consumption. In 1999, imported pork provided for only 8% of total Australian consumption. By 2010 it had grown to 47%. During the last decade imported pork as a share of total domestic consumption has averaged 46%.¹⁰

Figure 2.3 Imports vs local production as a share of available pork in Australia



Source: Thomas Elder Markets, *State of the Industry Report 2021*, Australian Pork Limited, 2021, p. 20.

⁶ Ibid., p. 8.

⁷ Australian Pork Limited, *Submission 543*, p. 52; Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 6.

⁸ Victorian Parliamentary Budget Office, *Submission 432*, p. 7.

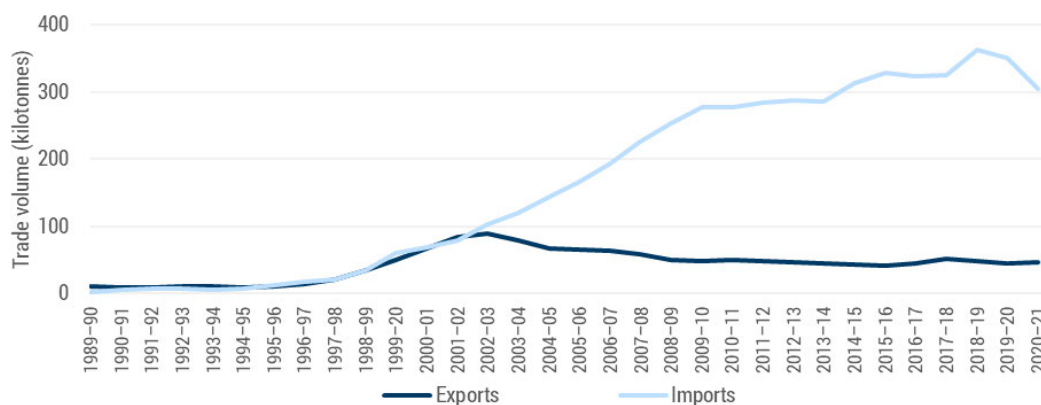
⁹ Ibid., p. 6.

¹⁰ Thomas Elder Markets, *State of the Industry Report 2021*, p. 20.

Pork imports into Australia

As reflected in Figure 2.3, Australian pork imports have increased significantly over the past two decades. The Victorian Parliamentary Budget Office reports that trade liberalisation enabled international meat producers to import processed pork meat into Australia from the late 1990s. Increasing consumption per person of processed meat drove higher import volumes from 1999.¹¹

Figure 2.4 Australian imports and exports of pig meat



Source: Victorian Parliamentary Budget Office, *Submission 432*, p. 7.

Export volumes matched import volumes from 1999 until 2003. In the early 2000s, Australian producers exported fresh pig products to Japan and Singapore during a time of favourable terms of trade and supply shortages in Southeast Asia. Exports have since declined from their 2003 levels (see Figure 2.4).¹²

Australian producers are no longer competitive with overseas producers in supplying processed meat in Australia. Today, they only supply around 25% of the local market. Imported processed meat accounts for most of the increase in consumption in Australia which has reduced retail prices, incentivising consumers to substitute away from less affordable meat categories.¹³

The Victorian Parliamentary Budget Office reports that Australian producers are uncompetitive at supplying processed pig meat for a variety of reasons:¹⁴

- A range of countries produce average carcass weights anywhere from 8% to 31% higher than Australia. Unlike some other countries, Australian producers do not use antimicrobials to promote growth.

¹¹ Victorian Parliamentary Budget Office, *Submission 432*, p. 6.

¹² *Ibid.*, p. 7.

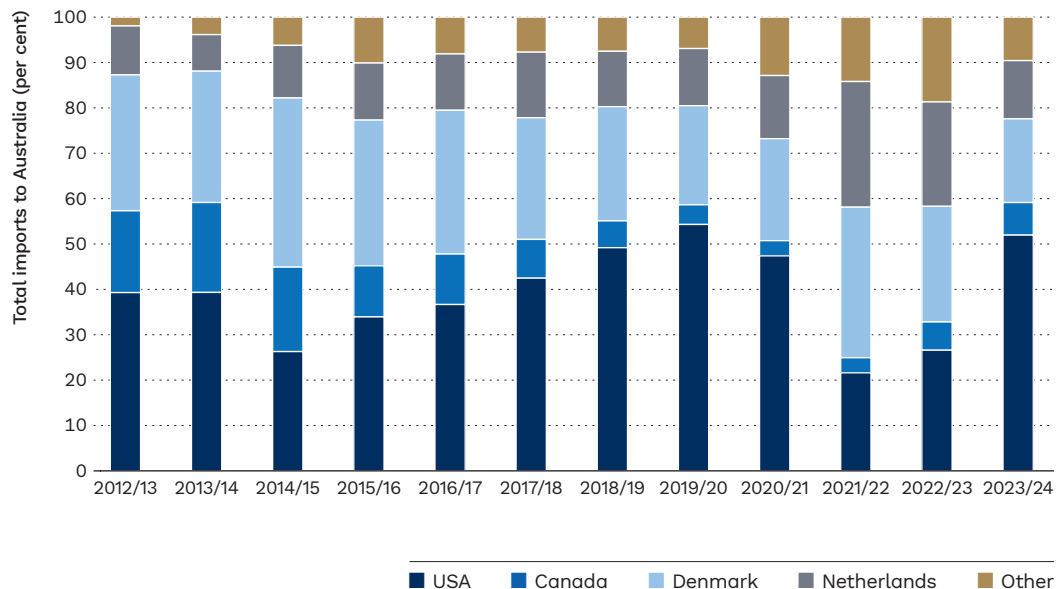
¹³ *Ibid.*

¹⁴ *Ibid.*

- Australia has comparatively higher wages than many international producers. China, which is the world's largest pig producer, has one of the lowest comparative wages and holds over 30% of the global herd.
- Australian producers experience higher feed costs, particularly during drought when domestic grain prices exceed international prices.

According to Australian Pork Limited's most recent Import and Export Report (February 2024), in 2023–24 the United States provided more than half of Australia's imported pork meat. The United States has consistently been the main supplier of imported pork for the past decade, with Canada, Denmark and the Netherlands the other significant suppliers.¹⁵

Figure 2.5 Australian import volume share by country – financial year comparison



Source: Australian Pork Limited, *Import and Export Report, February 2024*, p. 10.

2.3 Production

According to Australian Pork Limited, around 450,000 metric tonnes of pork are produced in Australia each year, 90% of which is consumed locally.¹⁶

The inability of Australian producers to compete with overseas producers of processed pig meat has limited production volumes in Australia. The volume of meat produced declined with the rise in processed meat imports. However, production volumes have recovered since 2008, buoyed by the fresh meat market.¹⁷

¹⁵ Australian Pork Limited, *Import and Export Report February 2024*, p. 10.

¹⁶ Australian Pork Limited, *Submission 543*, p. 4.

¹⁷ Victorian Parliamentary Budget Office, *Submission 432*, p. 7.

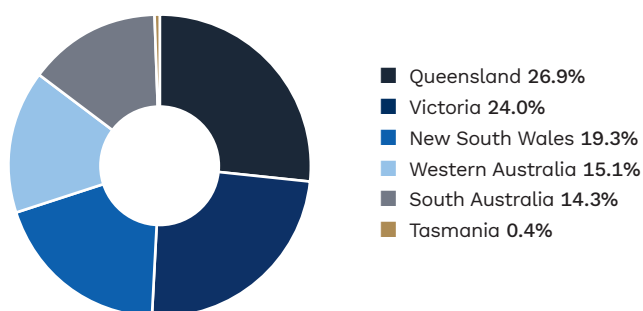
2.3.1 Herd size

After the mid-1970s the Australian pig herd steadily grew from 2.2 million head to 2.9 million head by the early 2000s. Industry rationalisation and a period of high feed costs saw the herd shrink to record lows by 2012 to just under 2.1 million head. The herd has since stabilised around 2.4 million head.¹⁸

The Australian sow herd spent much of the period from the 1970s to the early 2000s ranging between 300,000 to 350,000 head. The decline in the overall pig herd in 2012 was preceded by a drop in the sow herd towards 250,000 head. In recent years the sow herd has stabilised at around 265,000 head.¹⁹

Australian Bureau of Statistics data from 2021 reflects a relatively even distribution of pigs across mainland Australia. Queensland holds the nation's largest pig population at just over 607,000 head or nearly 27% of the total Australian herd. Victoria holds nearly 543,000 head, representing 24% of the national pig herd. Tasmania holds the smallest herd at just under 10,000 head or 0.4% of the national total.²⁰

Figure 2.6 Australian pig herd distribution share by state (2021)



Source: Thomas Elder Markets, *State of the Industry Report 2021*, Australian Pork Limited, 2021, p. 13.

The Victorian pig herd is dominated by the North Central region which holds more than half of the state's pig population. The top three regions for pig numbers in Victoria are North Central, Goulburn Broken and Corangamite which hold nearly 82% of the state's pigs.²¹

Victoria is a key contributor to Australia's pig production and exports. In 2020–21, Victoria had the third-largest pig herd in Australia with 497,000 pigs, comprising 19% of the national herd of 2.6 million pigs, behind Queensland (755,000; 29%) and New South Wales (543,000; 20%).²²

¹⁸ Thomas Elder Markets, *State of the Industry Report 2021*, p. 12.

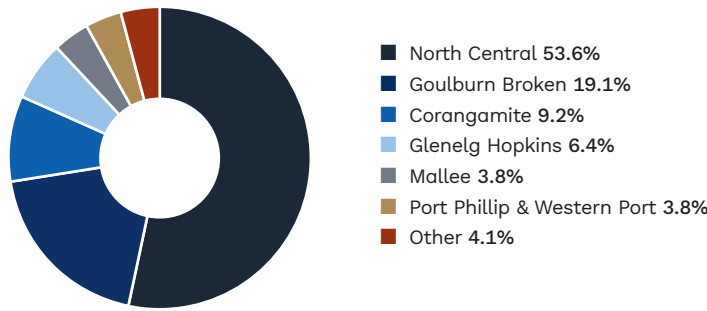
¹⁹ *Ibid.*, p. 12.

²⁰ *Ibid.*, p. 13.

²¹ *Ibid.*, p. 14.

²² Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 6.

Figure 2.7 Victorian pig herd distribution by region



Source: Thomas Elder Markets, *State of the Industry Report 2021*, Australian Pork Limited, 2021, p. 14.

2.3.2 Slaughter trends

Australian pig slaughter and production trends show a reasonably consistent growth pattern over the last five decades. The decline in the pig herd experienced during the first decade of the 2000s had a noticeable impact upon slaughter and production levels. The peak in slaughter occurred in 2003 at 5.7 million head, easing by 21% to a low of 4.5 million head in 2009. Since then, annual slaughter levels have lifted by nearly 19% to reach 5.3 million head in 2020.

Mirroring trends in slaughter rates, annual production levels peaked in 2003 at nearly 419 thousand tonnes before declining by 23% to a low of 324 thousand tonnes in 2009. Since 2009, annual pork production has recovered, reaching a new peak of 424 thousand tonnes in 2018 and steadying at nearly 419 thousand tonnes in 2020. While slaughter volumes have not yet reached a new peak, recent production rates were able to exceed the old 2003 peak due to increased carcass weights.²³

Figure 2.8 Pig meat produced in Australia and Victoria



Source: Victorian Parliamentary Budget Office, *Submission 432*, p. 7.

²³ Thomas Elder Markets, *State of the Industry Report 2021*, p. 15.

2.3.3 Pork production in Australia and Victoria

According to Australian Pork Limited, there are approximately 2.4 million pigs in Australia at any given time, and in 2022, there were 4,300 pig production sites nationally. Pig farming remains an important part of the Victorian agricultural sector, accounting for 22% of Australia's total pig meat production. In 2020–21, Victoria processed around 1.2 million pigs, producing 96,000 tonnes of pig meat.²⁴

Victoria's pig industry has become more commercialised, technologically advanced, more productive and more efficient. In 2020–21:²⁵

- Approximately 1.2 million pigs were slaughtered in Victoria.
- Approximately 30% of the pigs slaughtered in Victoria were sourced from interstate, including southern New South Wales. These pigs were typically transported to export-registered abattoirs, to enable their export overseas.
- Additionally, approximately 25% of Victorian pigs were processed in South Australia.
- Victoria was Australia's third-largest pig meat-producing state, processing approximately 96,000 tonnes of pig meat with a gross value of \$333.8 million—this comprised 22% of Australia's total pig meat production (432,000 tonnes) behind Queensland (103,000 tonnes) and South Australia (100,000 tonnes).

A total of 1,202,060 pigs were slaughtered in Victoria in abattoirs in the 2022–23 licence year. Approximately 93% of these pigs were subject to gas stunning.²⁶

2.3.4 Pig production process

Pig production (or pig husbandry) is the breeding, raising, care and sale of pigs in agriculture. A pig producer's herd of pigs consists of:

- sows, which are female pigs that breed
- a pool of gilts, which are female pigs that replace culled sows
- piglets, which producers wean shortly after birth
- pigs growing for slaughter.

The Victorian Parliamentary Budget Office cites a 2006 study of 72 Australian pig farms, finding:

- 21 piglets are weaned per sow per year
- 61% of sows are replaced each year

²⁴ RSPCA Victoria, *Submission 1358*, p. 6.

²⁵ Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 6.

²⁶ *Ibid.*, p 19.

- 80% of sows that are mated (or artificially inseminated) become pregnant.²⁷

Producers wean piglets off their mother's milk to a diet of grain typically four to eight weeks after birth. Weaned piglets are fed a specifically formulated diet to grow to market weight in five to six months. Over time, the industry has developed feed and nutritional practices to promote weight gain and higher carcass weight. Higher carcass weight lowers a producer's average unit cost and increases their financial returns as pigs are sold on a price per kilogram basis.²⁸

Producers manage sow pregnancy to supply pigs at a consistent rate. This avoids pigs overgrowing and becoming too heavy, and producers incurring additional feed costs. Abattoirs have limited holding capacity for pigs before slaughter and apply price penalties for pigs that are too heavy.²⁹

Pigs supplied to market are categorised as weaners, growers, finishers and backfatters according to their size and target market.³⁰

During a normal season there is a build-up in slaughter volumes from the start of the year, with a dip in slaughter occurring during the Easter recess and leading to a late autumn/early winter peak. Monthly slaughter volumes tend to decline gradually through winter to mid spring, before increasing pre-Christmas.³¹

Types of pigs grown for production

Some producers specialise at supplying weaner pigs to other farms to grow in weight. Growers are supplied to small butchers or food service clients for specific purposes such as type of cut or spit roasting. Most pigs are supplied to abattoirs as finishers for fresh and processed meat in the retail market. Backfatters are sows which are culled and used for processed meat.³²

Victoria's herds tend to be concentrated nearer to high-volume abattoirs. There are several abattoirs in central, central western, north and northeastern Victoria. These abattoirs draw pigs from surrounding Victorian producers as well as producers in other states.³³

²⁷ Victorian Parliamentary Budget Office, *Submission 432*, p. 5. The submission does not mention artificial insemination.

²⁸ Ibid.

²⁹ Ibid.

³⁰ Ibid.

³¹ Thomas Elder Markets, *State of the Industry Report 2021*, p. 14.

³² Victorian Parliamentary Budget Office, *Submission 432*, p. 6.

³³ Ibid.

Table 2.1 Types of pig

Pig category	Target market	Market weight (kg)
Weaner	Other pig producers	15–25
Grower	Fresh products	45–70
Finisher	Fresh and processed products	75–80
Backfatter	Processed products	More than 150

Source: Victorian Parliamentary Budget Office, *Submission 432*, p. 5.

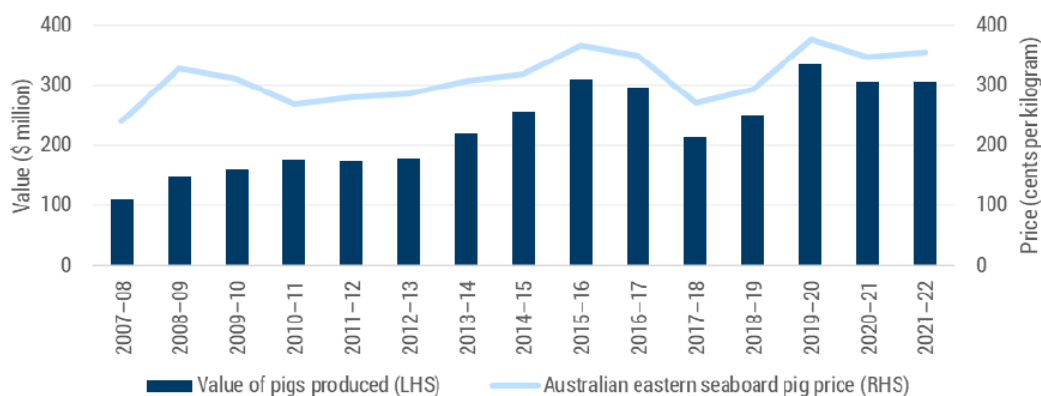
2.3.5 Export

In 2020–21, Victoria was Australia’s second-largest pig meat exporter, generating 25% (\$31 million) of the nation’s pig meat exports behind Western Australia which generates 28% of national exports (\$35 million). Victoria’s biggest pork export customers by value were Singapore (\$10 million), Papua New Guinea (\$8 million) and New Zealand (\$3 million), representing 0.2% of Victoria’s total food exports (\$14.4 billion).³⁴

2.4 Value

Australian Pork Limited (APL) has estimated that the pig industry contributed \$5.5 billion to the Australian economy in 2022–23.³⁵

2.4.1 Value of the pig industry in Victoria



Source: Victorian Parliamentary Budget Office, *Submission 432*, p. 9.

The Australian Bureau of Statistics (ABS) estimates that the value of pigs produced in Victoria was \$304.6 million in 2021–22, slightly down from a peak of \$334.2 million in 2019–20.³⁶

³⁴ Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 6.

³⁵ *Ibid.*, p. 5.

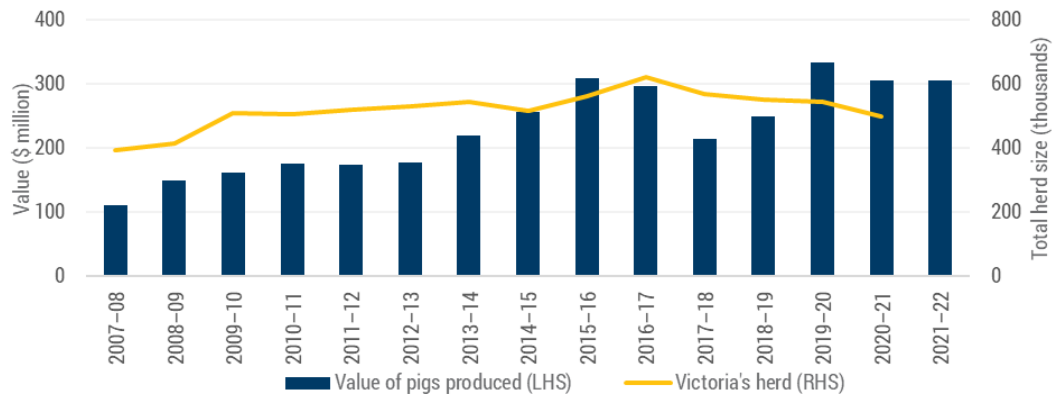
³⁶ Victorian Parliamentary Budget Office, *Submission 432*, p. 9.

In calculating the total value of pigs produced in Victoria since 2007–08 (Figure 2.9), the Victorian Parliamentary Budget Office expected that pig prices in Victoria would be roughly in line with the average Australian eastern seaboard price. Prices declined from 2015–16 to 2017–18 and recovered by 2019–20, with three consecutive years of above-average industry value.³⁷

Prices tend to cycle with drought and Australian grain price movements. Drought causes feed shortage and increases grain prices, which flow through to pig prices. Producers have supply arrangements to share risk around grain price uncertainty with abattoirs, wholesalers, and retailers.³⁸

Given that pigs grow to market weight in five to six months and that producers then incur unnecessary production costs to hold livestock, in its calculations in Figure 2.10, the Victorian Parliamentary Budget Office expected Victoria's production volumes move in line with the state's total herd size.³⁹

Figure 2.10 Total value of pigs produced and Victoria's total herd size



The Parliamentary Budget Office note: 2021–22 herd data was unavailable at the time of publication. The herd size is subject to an error of 10% to 25% and should be used with caution. We were unable to source information on the total pig production in Victoria. The total pigs slaughtered, as outlined in Figure 5, does not represent the total pig production in Victoria due to interstate trade between producers and abattoirs.

Source: Victorian Parliamentary Budget Office, *Submission 432*, p. 10.

Generally, herd size declines when there is drought, which causes feed supply shortages and increases the cost of holding and raising pigs. In 2007–08, following the worst dry years of the millennium drought which affected Australia's entire wheat crop, Victoria's herd reached a low of 394,000. Accordingly, industry value in Victoria declined to its lowest point in the last 15 years at this time.⁴⁰

³⁷ Ibid.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ Ibid., p. 10.

Industry output value increased significantly by 2016–17 and was 67% higher than in 2012–13. Prices climbed during this period and the herd size rose to its most recent high of over 600,000, suggesting increased production volume.⁴¹

By 2017–18, industry output value had declined by around 31% from its 2015–16 level, coinciding with a 26% fall in pig prices. Although pig prices and industry value recovered by 2019–20, herd levels remained subdued due to:

- the significant African Swine Fever outbreak overseas creating uncertainty for producers in Victoria
- the COVID-19 pandemic causing industry-wide supply chain disruptions.⁴²

These disruptions to supply have likely contributed to the recent inflation in local pig prices.⁴³

2.4.2 Gross value added

Gross value added measures the contribution of an industry to gross state product. It is equal to the total value of output minus taxes, subsidies and immediate consumption, or the costs to produce the output (excluding labour, depreciation and financial costs).

The Victorian Parliamentary Budget Office have estimated the gross value added of pig production in Victoria as follows:

Table 2.2 Gross value added of pig production in Victoria in 2021–22

Cost item	\$ million
Value of output	304.6
Intermediate consumption	(217.2)
Taxes	0.2
Subsidies	-
Gross value added	87.6

The Parliamentary Budget Office noted: Our estimate for gross value added is indicative, and reflects prevailing market commodity prices, particularly for grain and soybeans. Given that producers often have contracts in place to smooth out and hedge against the volatility in commodity prices, their actual input prices likely differ from prevailing market prices.

Source: Victorian Parliamentary Budget Office, *Submission 432*, p. 11.

By comparison, the ABS estimates the total gross value added of agriculture, forestry and fishing in Victoria was \$11,859 million in 2021–22.⁴⁴

⁴¹ Ibid.

⁴² Ibid.

⁴³ Ibid.

⁴⁴ Victorian Parliamentary Budget Office, *Submission 432*, p. 11.

2.5 Pig farms in Victoria

All pig owners, regardless of the intended use of the pigs, must comply with the National Livestock Identification System (Pigs).⁴⁵

In December 2023, Victoria's Property Identification Code (PIC) register estimated a total of 3,000 properties currently with pigs. Approximately 450 of these PICs have supplied pigs to abattoirs located in Victoria and interstate, however not all of these properties regularly farm pigs for the pig meat industry. Agriculture Victoria currently recognises 253 commercial pig farm businesses across the State.⁴⁶

In Australia approximately 90% of commercial pigs are housed in intensive indoor systems and the other 10% of pigs are housed in outdoor bred and free-range systems.⁴⁷

2.5.1 Changing structure of pig industry

Over the last three decades, there have been substantial productivity and structural changes in the pig industry. The shift from smallholder farms to large-scale production systems has changed the industry rapidly.⁴⁸

There has been an overall decline in the number of piggeries in Victoria, with 250 pig farm businesses recorded in 2020–2021, a 26% decline from 2019–2024. Significant changes in the industry have led to a reduction in pig farm numbers, seeing smaller producers close down as large-scale producers move towards more intensive production systems. The introduction of more sustainable and efficient infrastructure technology has had a significant impact on improving the welfare of pigs. Intensive production systems expose pigs to various stress factors, preventing many from experiencing higher standards of welfare.⁴⁹ RSPCA Victoria told the Committee:

Historically, pigs were farmed as an additional source of income in the dairy and grain industries, but pig farming has since evolved into its own industry including intensive farming methods. The shift towards intensification, industrialisation, and specialisation has had a large impact on the industry, changing the way society views farming and the relationship we have with farmed animals.⁵⁰

The structure of Victoria's pig industry has changed dramatically since the 1990s. The number of commercial pig farms operating across the state has sharply declined, almost halving from 550 in the 1990s to 253 in 2022–23. Additionally, in 2022:

- There were 253 commercial pig farms operating in Victoria, comprising around 21% of the nation's 1,200 large scale pig farms.

⁴⁵ Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 5.

⁴⁶ *Ibid.*

⁴⁷ RSPCA, *Submission 1358*, p. 16.

⁴⁸ *Ibid.*, pp. 5–6.

⁴⁹ *Ibid.*, p 6.

⁵⁰ *Ibid.*

- An estimated 630 people work on farms rearing pigs.
- More than 2,730 people were employed in Victorian cured meat and smallgoods manufacturing plants.

Despite this decline in the number of pig farms, Victoria's production of pig meat has increased. The pig farming sector has seen a trend toward consolidation and integration as smaller pig farms have been sold to larger operators or businesses.⁵¹

Additionally, some farmers/operators are highly organised, breeding and growing out pigs under contracts with larger food processing companies. These larger companies operate across jurisdictions and are well attuned to any differences in the regulatory arrangements between states and territories. These businesses may have the ability to shift their businesses from one jurisdiction to another if arrangements are perceived to be anticompetitive or adverse to industry.⁵²

Some companies are vertically integrated, owning both breeding and growing facilities, feed mills, abattoirs and processing facilities and providing in-house services such as veterinary care, vaccinations and other pharmaceuticals.⁵³

2.5.2 Abattoirs and slaughter

While 75 abattoirs process pigs in Australia, Australian Pork Limited estimates that around 85% of pigs are processed at seven export-registered abattoirs. These abattoirs are licensed to process pigs for domestic markets as well as for export to international markets and use CO₂ stunning methods. The remaining 15% of pigs in Australia are slaughtered and processed at smaller abattoirs that process pigs for domestic markets only.⁵⁴

Pig farmer Tammi Jonas told the Committee:

We also do not really have much choice in terms of our access to our abattoirs in Victoria and the other states also. The consolidation of the industry has meant less and less options for small-scale farmers to choose where we conduct slaughter, so our pigs are stunned with CO₂ and we do not like that method. I have worked in the abattoir because of doing my meat inspection training, and I have seen distressed pigs in that setting.⁵⁵

Small holders vs broadacre

One of the issues raised during the inquiry was not simply the treatment of the animals within particular facilities, but the nature of large-scale factory farming itself.

⁵¹ Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 6.

⁵² *Ibid.*

⁵³ *Ibid.*

⁵⁴ *Ibid.*, p. 19.

⁵⁵ Tammi Jonas, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 61.

It was suggested by a number of witnesses that the scale and speed required for the processing of pigs to provide food profitably was not conducive to an animal welfare focus.

Tammi Jonas told the Committee that this process is not the only way to provide food:

we would submit that a system that does not require such high throughput and speed over the line to operate is actually the best way to back ourselves out of a system that is inherently reducing animal welfare. If you slow things down, you grow animals.⁵⁶

Ms Jonas told the Committee in a public hearing ‘that 70 per cent of the world’s food is produced by smallholders, even though that is very strange in Australia because it is mostly broadacre farms in this country. In the global majority world, it is 70% by smallholders, and those are mostly on less than 2 hectares of acreage.’⁵⁷ She added:

The world can be fed by small-scale farmers because it is, so we would advocate a system that starts to deconsolidate and actually has more farmers in communities growing animals and using smaller abattoirs like the one that we are building here on our farm so that you do not have to put them through in volume and use CO2 stunning. There are much better methods with proximity to the farmers and the handlers.⁵⁸

56 Ibid., pp. 62–3.

57 Ibid., p. 62.

58 Ibid.

Chapter 3

The regulatory framework

3.1 Introduction

The regulatory framework for pig welfare in Victoria is large and fragmented, comprising:

- Commonwealth and Victorian legislation
- Australian and Victorian standards and guidelines
- model codes of practice
- industry-designed quality assurance programs.

This chapter outlines the various tiers of regulation and corresponding actors. It seeks to highlight the interaction between these tiers and considers how the framework could be changed to improve the welfare of pigs on Victorian farms and abattoirs.

3.2 Relevant laws and standards

The following laws and standards are relevant to the welfare of pigs in Victoria.

3.2.1 Prevention of Cruelty to Animals Act 1986 (Vic)

The *Prevention of Cruelty to Animals Act 1986 (Vic)* (POCTA) seeks to prevent cruelty to animals, encourage considerate treatment of animals, and improve community awareness about the prevention of animal cruelty.¹

To achieve these aims, the Act makes it an offence to commit cruelty to an animal, which it defines to include:

- wounding, mutilating, or torturing an animal
- loading, crowding or confining an animal in a way that causes it unreasonable pain or suffering
- driving, carrying or packing an animal in a way that causes it unnecessary pain or suffering
- carrying out a prohibited procedure on an animal, which includes cropping the ears of a dog, docking the tail of a dog or horse, and clipping the teeth of a sheep.²

¹ *Prevention of Cruelty to Animals Act 1986 (Vic)* s 1.

² *Prevention of Cruelty to Animals Act 1986 (Vic)* ss 3 and 9.

Likewise, the Prevention of Cruelty to Animals Regulations 2019 (Vic) outlines offences in relation to, for example:

- transporting animals, including farm animals and livestock³
- tethering animals⁴
- electric prodders and electronic stunning devices.⁵

In evidence to the Committee, the Farm Transparency Project highlighted that the POCTA does not protect farmed animals. In a public hearing, Chris Delforce from Farm Transparency Project told the Committee that:

The POCTA itself I think essentially forbids cruelty. The issue is that we have these codes of practice that then say, ‘Okay, here’s all the kinds of cruelty you can legally do.’ The other thing is that POCTA does not cover slaughter. That is the Meat Industry Act, which relates to AS 4696, the federal standard, which basically also says that all animals must be slaughtered with no unnecessary pain, suffering et cetera, and arguably gas chambers are not in line with that standard.⁶

Under the General Orders, the Minister for Agriculture is responsible for administering the Act.⁷ In practice, this is carried out by Agriculture Victoria, an arm of the Department of Energy, Environment and Climate Action. Enforcement of the Act and regulations is performed by POCTA inspectors approved by the Minister for Agriculture.⁸ These generally include police officers and officers from Agriculture Victoria and the Royal Society for the Prevention of Cruelty to Animals (RSPCA).⁹

The Department of Energy, Environment and Climate Action and PrimeSafe explained in their joint submission that Agriculture Victoria investigates animal welfare complaints involving 10 or more pigs.¹⁰ Complaints involving less than 10 pigs are referred to RSPCA Victoria.¹¹ This is also outlined in the Memorandum of Understanding between RSPCA Victoria and the former Department of Jobs, Precincts and Regions.¹²

³ *Prevention of Cruelty to Animals Regulations 2019* (Vic) reg 6.

⁴ *Prevention of Cruelty to Animals Regulations 2019* (Vic) reg 7.

⁵ *Prevention of Cruelty to Animals Regulations 2019* (Vic) regs 18 and 19.

⁶ Chris Delforce, Founder and Executive Director, Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 14.

⁷ Hon Jacinta Allan MP, Premier of Victoria, *General Order dated 2 April 2024* (n.d.), <<https://content.vic.gov.au/sites/default/files/2024-04/general-order-dated-2-april-2024.pdf>> p. 13.

⁸ *Prevention of Cruelty to Animals Act 1986* (Vic) s 18.

⁹ *Prevention of Cruelty to Animals Act 1986* (Vic) s 18.

¹⁰ Department of Energy, Environment and Climate Action and PrimeSafe Victoria, *Submission 425*, p. 16.

¹¹ *Ibid.*

¹² Department of Jobs, Precincts and Regions, *Memorandum of Understanding between the Royal Society for the Prevention of Cruelty to Animals and the Department of Jobs, Precincts and Regions*, 2019, <https://agriculture.vic.gov.au/_data/assets/pdf_file/0009/529857/MoU_RSPCA_Victoria_and_DJPR_2019-2024.pdf> accessed 16 April 2024.

If a person is convicted of an offence under the Prevention of Cruelty to Animals Act, the court may:

- make a control order that disqualifies the person from owning or being in charge of an animal or class of animals, or applies conditions to the person which they must comply with¹³
- authorise a POCTA inspector to monitor compliance with a control order.¹⁴

Likewise, a POCTA inspector can:

- if they believe a person is committing or likely to commit an offence under the Act or regulations, issue a notice to comply, failure to comply with which is an offence¹⁵
- if they believe a person is not complying or is not likely to comply with a control order, apply to a court for an order authorising the inspector to monitor compliance¹⁶
- if they have been authorised to monitor compliance of a control order
 - enter and search premises for an animal specified in the order
 - seize and retain possession an animal specified in the order
 - examine and take specimens from an animal specified in the order
 - take and keep photos of an animal specified in the order¹⁷
- if they enter a premises in accordance with the Act, require a person to provide information or produce documents¹⁸
- in the case of emergencies, such as where an animal may have been confined without food or water for more than 36 hours, enter premises and perform certain actions¹⁹
- if they believe there are at risk animals on premises, or things connected with a contravention of the Act or Regulations, apply to a magistrate for a search warrant²⁰
- if they find something that has been used in connection with an offence under the Act of Regulations, seize, inspect, measure, or take photographs of the thing.²¹

¹³ *Prevention of Cruelty to Animals Act 1986* (Vic) s 12.

¹⁴ *Prevention of Cruelty to Animals Act 1986* (Vic) s 21A.

¹⁵ *Prevention of Cruelty to Animals Act 1986* (Vic) s 24ZP.

¹⁶ *Prevention of Cruelty to Animals Act 1986* (Vic) s 21B.

¹⁷ *Prevention of Cruelty to Animals Act 1986* (Vic) s 21C.

¹⁸ *Prevention of Cruelty to Animals Act 1986* (Vic) s 24ZQ.

¹⁹ *Prevention of Cruelty to Animals Act 1986* (Vic) s 23.

²⁰ *Prevention of Cruelty to Animals Act 1986* (Vic) ss 24G and 24K.

²¹ *Prevention of Cruelty to Animals Act 1986* (Vic) s 24J.

Notably, the Act does not apply to:

- the slaughter of animals in accordance with the *Meat Industry Act 1993* (Vic) or any Commonwealth legislation
- the farming, transport, sale or killing of any farm animal which is carried out in accordance with a Code of Practice ('POCTA Code of Practice')
- in certain instances, the slaughter of animals on a farm.²²

The only POCTA Code of Practice relevant to the pig industry is the Code of Practice for the Welfare of Animals at Saleyards.²³ Accordingly, the Act generally applies to the production, transportation and sale of commercial pigs in Victoria but not to the slaughter and processing of those pigs. Moreover, under the *Livestock Management Act 2010* (Vic), it is a defence to an offence under the Prevention of Cruelty Act if the person who committed the offence was carrying a regulated livestock management activity and acting in compliance with a prescribed livestock management standard.²⁴ In a public hearing, the Australian Meat Industry Council's Tim Ryan explained the reasoning behind the Act's exemption of slaughter:

The current POCTA Act does have an exemption in the Act for animal slaughter. The POCTA Act is designed to protect and sustain animal life. If we are part of a process that produces food but as part of the process to produce food we would end the life respectfully and humanely of an animal, it is to some degree diametrically opposed to the POCTA Act. They cannot coexist necessarily. So there is an exemption, and animal welfare is then covered under the Meat Industry Act, which can sit far more harmoniously alongside all the food safety aspects of regulation.²⁵

3.2.2 Meat Industry Act 1993 (Vic)

The *Meat Industry Act 1993* (Vic) sets the standards for meat production in Victoria.²⁶ It applies to meat for human and pet consumption, but does not apply to certain meats, including dried meats and meat to which a brand has been applied in accordance with the *Export Control Act 2020* (Cth).²⁷

Under the General Orders, the Minister for Agriculture is responsible for administering the Act.²⁸ In practice, this is carried out by Agriculture Victoria. Moreover, the Act establishes PrimeSafe as the authority responsible for controlling and reviewing the standards of:

- meat produced for consumption or sale in Victoria

²² *Prevention of Cruelty to Animals Act 1986* (Vic) s 6.

²³ Department of Energy, Environment and Climate Action and PrimeSafe Victoria, *Submission 425*, p. 11.

²⁴ *Livestock Management Act 2010* (Vic) s 4.

²⁵ Tim Ryan, General Manager, Industry Affairs, Australian Meat Industry Council, public hearing, Melbourne, 13 March 2024, *Transcript of Evidence*, p. 18

²⁶ *Meat Industry Act 1993* (Vic) s 1.

²⁷ *Meat Industry Act 1993* (Vic) s 5(1)(c).

²⁸ Hon Jacinta Allan MP, Premier of Victoria, *General Order dated 2 April 2024* (n.d.), <<https://content.vic.gov.au/sites/default/files/2024-04/general-order-dated-2-april-2024.pdf>> p. 13.

- the construction and hygiene of meat processing facilities and transport vehicles.²⁹

Under the Act, PrimeSafe also:

- licences meat processing facilities³⁰
- provides inspection services for animals and meat at licensed meat processing facilities, except facilities licenced under the Export Control Act³¹
- appoints and ensures inspectors are appropriately qualified³²
- approves, monitors implementation of, and reviews compliance with quality assurance programs³³
- makes Codes of Practice, which licensees must comply with.³⁴

Under the Act, a person must not operate a meat processing facility unless they are licensed to do so.³⁵ They must also comply with the conditions or restrictions specified in that licence.³⁶

Inspectors have the power to take any action necessary to find out whether the provisions of the Act, regulations, a licence, or a quality assurance program are being complied with.³⁷ In the case of non-compliance, an inspector may make a report to the chief executive officer, who may in turn prohibit an owner, operator, licensee or manager of a meat processing facility or meat transport vehicle from using that facility or vehicle.³⁸

According to the Department of Energy, Environment and Climate Action and PrimeSafe's submission:

Agriculture Victoria and PrimeSafe have an agreement on collaboration in animal welfare investigations relating to the operation of abattoirs and knackeries. The agreement sets out their shared commitment to a coordinated approach in responding to animal welfare complaints.³⁹

The submission explains that, by conditions imposed on licences, licensees must comply with the Australian Meat Standard.⁴⁰

²⁹ *Meat Industry Act 1993* (Vic) ss 43–44.

³⁰ *Meat Industry Act 1993* (Vic) ss 44 and 22.

³¹ *Meat Industry Act 1993* (Vic) s 6.

³² *Meat Industry Act 1993* (Vic) ss 44 and 70.

³³ *Meat Industry Act 1993* (Vic) s 44.

³⁴ *Meat Industry Act 1993* (Vic) ss

³⁵ *Meat Industry Act 1993* (Vic) s 40.

³⁶ *Meat Industry Act 1993* (Vic) s 41.

³⁷ *Meat Industry Act 1993* (Vic) s 72.

³⁸ *Meat Industry Act 1993* (Vic) s 74.

³⁹ Department of Energy, Environment and Climate Action and PrimeSafe Victoria, *Submission 425*, p. 4.

⁴⁰ *Ibid.*, p. 10.

3.2.3 Export Control Act 2020 (Cth)

The *Export Control Act 2020* (Cth) creates a framework for regulating the export of goods from Australia.⁴¹ In their joint submission, the Department of Energy, Environment and Climate Action and PrimeSafe note that:

[The Export Control Act and Rules] primarily relate to food safety and traceability, in order to ensure that goods exported from Australia meet the requirements of importing countries and that export conforms with industry standards and Australia's international obligations.⁴²

Through the *Export Control (Meat and Meat Products) Rules 2021* (Cth), the Act prohibits the export of meat unless certain conditions are met.⁴³ These include that:

- all importing country requirements are met
- operations to prepare the meat for export are registered for those operations
- the exporter holds an export permit.⁴⁴

The Rules also require that, in order to be registered under the Act, establishments that prepare meat for export:

- operate in a way that will ensure the requirements of the Act are complied with⁴⁵
- meet the requirements of the *Australian Standard for the Hygienic Production and Transportation of Meat Products for Human Consumption*⁴⁶
- meet certain other requirements in relation to equipment and facilities.⁴⁷

As noted in Section 3.2.2., the Meat Industry Act does not apply to meats to which a brand has been applied in accordance with the Export Control Act. It also exempts PrimeSafe from inspecting meat processing facilities licenced under the Export Control Act. In their submission, the Department of Energy, Environment and Climate Action and PrimeSafe explain that, 'for the purpose of minimising duplication, [the Department of Agriculture, Fisheries and Forestry] undertakes inspections and monitors compliance of all facilities that are licensed to export meat'.⁴⁸

⁴¹ *Export Control Act 2020* (Cth) s 4.

⁴² Department of Energy, Environment and Climate Action and PrimeSafe Victoria, *Submission 425*, p. 9.

⁴³ *Export Control (Meat and Meat Products) Rules 2021* (Cth) ss 2-1 and 2-4.

⁴⁴ *Export Control (Meat and Meat Products) Rules 2021* (Cth) s 2-4.

⁴⁵ *Export Control (Meat and Meat Products) Rules 2021* (Cth) s 4-2.

⁴⁶ *Export Control (Meat and Meat Products) Rules 2021* (Cth) s 4-3.

⁴⁷ *Export Control (Meat and Meat Products) Rules 2021* (Cth) ss 4-4, 4-5, 4-5, 4-7, 4-8 and 4-9.

⁴⁸ Department of Energy, Environment and Climate Action and PrimeSafe Victoria, *Submission 425*, p. 10.

3.2.4 Australian Standard for the Hygienic Production and Transportation of Meat Products for Human Consumption

The purpose of the *Australian Standard for the Hygienic Production and Transportation of Meat Products for Human Consumption* (the Australian Meat Standard) is to ensure meat for human consumption complies with food safety requirements.⁴⁹

Section 7 of the Standard relates to animal welfare, seeking to minimise the risk of injury, pain and suffering to animals and cause them the least practicable disturbance.⁵⁰ In particular, it seeks to achieve animal welfare in relation to:

- the handling of animals, including in relation to feed, water, shade, shelter, space and ventilation
- the slaughtering of animals, including in pre-slaughter stunning
- the handling, restraint and accommodation of work animals.⁵¹

Regarding slaughter and pre-slaughter stunning, the section requires that animals are stunned in a way that renders them unconscious and insensible to pain until slaughter occurs, and restrained in a way that ensures stunning is effective.⁵²

As noted above in Section 3.2.3, the Export Control (Meat and Other Products) Rules requires establishments that prepare meat for export to meet the requirements of the Australian Meat Standard. Likewise, PrimeSafe Victoria requires meat processing facilities to meet the requirements of the Australian Meat Standard as a condition of their licence.

The Department of Energy, Environment and Climate Action and PrimeSafe explained that on 1 July 2023, a 2023 edition of the standard was implemented to replace the 2007 version.⁵³ It noted the 2007 edition will continue to apply as part of licence conditions in Victoria until the current licences expire in 2024.⁵⁴

49 Australia and New Zealand Food Regulation Ministerial Council, *Australian standard for the hygienic production and transportation of meat and meat products for human consumption* (AS 4696:2007), 2007, <<https://www.primesafe.vic.gov.au/resources/australian-standard-for-the-hygienic-production-and-transportation-of-meat-and-meat-products-for-human-consumption>> accessed 9 April 2024.

50 *Ibid.*, pp. 21–22.

51 *Ibid.*

52 *Ibid.*

53 Department of Energy, Environment and Climate Action, *Submission 425*, p. 15.

54 *Ibid.*

3.2.5 Livestock Management Act 2010 (Vic)

The *Livestock Management Act* (Vic) regulates the management of livestock in Victoria, including pigs and any other animals kept for the purposes of primary production.⁵⁵ In particular, it requires livestock operators to:

- comply with prescribed livestock management standards⁵⁶
- carry out systematic risk assessments, which must include
 - an assessment of likely risks to animal welfare and biosecurity
 - details of control measures to comply with standards and minimise likely risks.⁵⁷

Under the *Livestock Management Regulations 2021* (Vic), the prescribed livestock management standards are:

- the Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock
- the Victorian Standards and Guidelines for the Welfare of Pigs.⁵⁸

The two standards are outlined below in Section 3.2.6.

Under the Act, it is an offence for a livestock operator to act in a manner that seriously risks:

- human health
- animal welfare
- biosecurity
- spreading disease.⁵⁹

It is also an offence to fail to comply with a notice to comply. An inspector has the power to issue a notice to comply if they believe a person has failed to comply with or contravened:

- a prescribed livestock management standard
- the requirement to carry out systematic risk assessments
- an approved compliance arrangement.⁶⁰

⁵⁵ *Livestock Management Act 2010* (Vic) ss 1 and 3.

⁵⁶ *Livestock Management Act 2010* (Vic) s 6.

⁵⁷ *Livestock Management Act 2010* (Vic) ss 7 and 8.

⁵⁸ *Livestock Management Regulations 2021* (Vic) reg 7.

⁵⁹ *Livestock Management Regulations 2021* (Vic) regs 50–50B.

⁶⁰ *Livestock Management Act 2010* (Vic) s 46.

Since 2022, it has also been an offence for a person to contravene a prescribed biosecurity measure where there is a biosecurity management plan and appropriate signage in place, and for a person to damage or deface biosecurity signage.⁶¹

As with the Prevention of Cruelty to Animal and Meat Industry Acts, under the General Orders, the Minister for Agriculture is responsible for administering the Act.⁶² In practice, this is carried out by Agriculture Victoria. If an inspector from Agriculture Victoria believes the Act, regulations or standards have not been complied with, they have the power to enter and search premises.⁶³ In order to exercise these powers, they must have the consent of the occupier of the premises.⁶⁴ If they have been or are likely to be refused entry, they may apply for a search warrant from the Magistrate's Court.⁶⁵

As part of their powers of entry, inspectors can, subject to certain conditions:

- search, inspect or examine, including premises, livestock, equipment, machinery and vehicles⁶⁶
- require a person to produce documents⁶⁷
- require a person to answer a question or provide information⁶⁸
- take and remove samples⁶⁹
- take photographs⁷⁰
- stop and detain vehicles.⁷¹

The application of the Act does not affect the operation of the Prevention of Cruelty to Animals Act or the Meat Industry Act.⁷²

3.2.6 Prescribed livestock management standards

The Livestock Management Act and Regulations lists the following as prescribed livestock management standards:

- the Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock (the Land Transport Standard)

⁶¹ *Livestock Management Regulations 2021* (Vic) ss 50–50B.

⁶² Hon Jacinta Allan MP, Premier of Victoria, *General Order dated 2 April 2024* (n.d.), <<https://content.vic.gov.au/sites/default/files/2024-04/general-order-dated-2-april-2024.pdf>> p. 13.

⁶³ *Livestock Management Act 2010* (Vic) s 31.

⁶⁴ *Livestock Management Act 2010* (Vic) s 31.

⁶⁵ *Livestock Management Act 2010* (Vic) s 32.

⁶⁶ *Livestock Management Act 2010* (Vic) s 38.

⁶⁷ *Livestock Management Act 2010* (Vic) s 39.

⁶⁸ *Livestock Management Act 2010* (Vic) s 40.

⁶⁹ *Livestock Management Act 2010* (Vic) s 41.

⁷⁰ *Livestock Management Act 2010* (Vic) s 42.

⁷¹ *Livestock Management Act 2010* (Vic) s 43.

⁷² *Livestock Management Act 2010* (Vic) s 4.

- the Victorian Standards and Guidelines for the Welfare of Pigs (the Pig Welfare Standard).⁷³

Under the Livestock Management Act, an inspector can issue a notice to comply if the inspector believes a person has contravened either of these prescribed standards. The Act makes it an offence to fail to comply with a notice to comply.

Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock

The purpose of the Land Transport Standard is to describe standards and guidelines that ensure the welfare of livestock during land transport.⁷⁴ Whereas the standards reflect requirements that are enforceable under the Livestock Management Act, the guidelines are intended as recommendations, non-compliance with which does not constitute an offence.⁷⁵

The Land Transport Standards contain general standards and guidelines for the transport, as well as species-specific standards and guidelines, including for pigs.

The general standards include that:

- people in charge exercise a duty of care to ensure the welfare of livestock and compliance with livestock transport standards⁷⁶
- people involved in the livestock transport process are competent to perform their required task, or be supervised by a competent person⁷⁷
- people in charge ensure that vehicles and handling facilities minimise risk to the welfare of livestock, for example by being appropriate to contain the relevant species⁷⁸
- people in charge assess livestock as fit for the intended journey at every loading, and where they are not, make appropriate arrangements for their care, treatment or humane destruction⁷⁹
- people in charge load, transport and unload livestock in a way that minimises risk to livestock welfare, for example by managing access to water, assessing loading density, segregating livestock, appropriately handling livestock, and providing assistance to distressed or injured animals⁸⁰

⁷³ *Livestock Management Regulations 2021* (Vic) s 7.

⁷⁴ Standing Council on Primary Industries, *Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock*, 2012, <<https://animalwelfarestandards.net.au/wp-content/uploads/2023/08/Land-transport-of-livestock-Standards-and-Guidelines-Version-1.-1-21-September-2012.pdf>> accessed 26 April 2024, p. 2.

⁷⁵ *Ibid.*

⁷⁶ *Ibid.*, p. 7.

⁷⁷ *Ibid.*, p. 15.

⁷⁸ *Ibid.*, p. 17.

⁷⁹ *Ibid.*, p. 19.

⁸⁰ *Ibid.*, p. 23.

- people in charge ensure humane destruction methods that result in rapid loss of consciousness and death during unconsciousness.⁸¹

Specific requirements for the land transport of pigs include:

- people in charge ensure time off water does not exceed 24 hours for pigs in general, and 12 hours for lactating sows, piglets, and weaners, and where pigs have been off water for the maximum time pigs are provided a spell for a minimum of 12 hours⁸²
- people loading, transporting or unloading pigs must not use electric prodders except where necessary.⁸³

Victorian Standards and Guidelines for the Welfare of Pigs

The purpose of the Pig Welfare Standard is to describe standards and guidelines that ensure the welfare of pigs in Australian production systems.⁸⁴ Like the Land Transport Standard, the Pig Welfare Standard contains both standards and guidelines. Whereas the standards reflect requirements that are enforceable under the Livestock Management Act, the guidelines are intended as recommendations, non-compliance with which does not constitute an offence.⁸⁵

The Pig Welfare Standard is separate to but based on the Model Code of Practice for the Welfare of Animals: Pigs, which is described at Section 3.2.7 below. The submission from the Department of Energy, Environment and Climate Action describes as the Pig Welfare Standard as having ‘adopted’ the Model Code.⁸⁶

Relevant standards include that:

- stockpeople are skilled in pig husbandry and suitably qualified to maintain animal health and welfare, or are under the direct supervision of such people⁸⁷
- pigs are provided adequate feed and water to maintain their health and meet their physiological requirements, and stockpeople take remedial action to ensure pigs are not deprived of access⁸⁸
- accommodation for pigs minimises risk to adverse weather, injuries or predators, and all new housing meets minimum space requirements, including:
 - sow stalls
 - farrowing pens and crates

⁸¹ Ibid., p. 33.

⁸² Ibid., p. 89.

⁸³ Ibid.

⁸⁴ Department of Primary Industries, *Victorian Standards and Guidelines—Welfare of Pigs*, 2012, <https://agriculture.vic.gov.au/_data/assets/pdf_file/0017/530333/Victorian-Pig-Welfare-Standards_Revision-1_March-2012.pdf> accessed 26 April 2024, p. 1.

⁸⁵ Ibid.

⁸⁶ Department of Energy, Environment and Climate Action and PrimeSafe Victoria, *Submission 425*, p. 13.

⁸⁷ Department of Primary Industries, *Victorian Standards and Guidelines—Welfare of Pigs*, p. 5.

⁸⁸ Ibid., pp. 6–8.

- boar stalls and pens
- group housing⁸⁹
- from 20 April 2017, sows are not confined in stalls for more than six weeks of any gestation period⁹⁰
- faeces and urine are not permitted to accumulate to the stage pigs have no clear area to lie⁹¹
- stockpeople can recognise signs of ill health in pigs and take appropriate action, including by treating, isolating or destroying sick, weak or injured pigs⁹²
- electric prodders are not used except during loading, transport or unloading where necessary⁹³
- elective husbandry procedures are carried out by a person who is suitably qualified and in accordance with the standards⁹⁴
- destruction of a pig must cause sudden unconsciousness, and death must occur during unconsciousness.⁹⁵

The Pig Welfare Standard does not create any requirements for the preparation of pigs for transport and slaughter, which are contained in the Land Transport Standard and relevant legislation.

3.2.7 Australian Model Codes of Practice for the Welfare of Animals

As well as separate Commonwealth and State laws relating to the production and welfare of animals, Australia has a number of Model Codes of Practice for the Welfare of Animals. On its website, the Australian Government Department of Agriculture, Fisheries and Forestry explains that:

For Australia's livestock industries, the Model Codes of Practice for the Welfare of Animals (Model Codes) establish an agreed set of principles and practices. The Model Codes were endorsed by the then Primary Industries Ministerial Council. The Model Codes serve as voluntary guides for people responsible for the welfare and husbandry of a range of livestock animals.⁹⁶

The Department notes that the Australian Government, through the Animal Welfare Task Group, is working with states and territories to update and replace the Model Codes with nationally consistent standards and guidelines called the Australian Animal

⁸⁹ Ibid., pp. 9-10.

⁹⁰ Ibid., p. 11.

⁹¹ Ibid., p. 17.

⁹² Ibid., p. 20.

⁹³ Ibid., p. 23.

⁹⁴ Ibid., p. 24.

⁹⁵ Ibid., p. 28.

⁹⁶ Department of Agriculture, Fisheries and Forestry, *Animal Welfare in Australia*, <<https://www.agriculture.gov.au/agriculture-land/animal/welfare/animal-welfare-in-australia>> accessed 22 April 2024.

Welfare Standards and Guidelines.⁹⁷ At the time of writing, work has not begun to replace the Model Code relating to the welfare of pigs.⁹⁸ The Victorian Standards and Guidelines for the Welfare of Pigs—also referred to as the Pig Welfare Standard—continues to be based on the Model Code, which was last updated in 2008.

The Model Code was prepared by the Animal Welfare Working Group, which comprised at the time of:

- representatives from State and Territory Government departments responsible for agriculture
- CSIRO
- Animal Health Australia
- the Department of Agriculture, Fisheries and Forestry.⁹⁹

The preface to the Code notes that the Working Group undertook extensive consultation with industry and animal welfare organisations.¹⁰⁰

3.3 Self-regulation in the Victorian pork industry

Despite the regulatory framework described above, the Committee heard from a number of stakeholders who contended that the Victorian pig industry is ‘self-regulated’.

Many submissions, for example, contained the following paragraph from a submission guide made available by Animals Australia:

Pig farming is not properly regulated. In fact, it is largely self-regulated, with dire outcomes for pigs. Current methods used to farm and slaughter pigs are being signed off by Federal or State Agricultural authorities, who are the same Departments charged with promoting high productivity and profit by the pig industry. This is an unacceptable conflict of interest that must be resolved.¹⁰¹

Likewise, a significant number of submissions contained this paragraph from a submission template made available by the Farm Transparency Project:

Enforcement of Victorian and federal legislation is largely outsourced to the industry itself, allowing for self-regulation (such as the industry promised sow-stall phase-out) and industry backed certification through schemes such as the Australian Livestock

⁹⁷ Ibid.

⁹⁸ Ibid.

⁹⁹ Primary Industries Standing Committee, *Model Code of Practice for the Welfare of Animals—Pigs*, 2008, <https://australianpork.com.au/sites/default/files/2021-06/Handbook_for_the_model_code_of_practice.pdf> accessed 26 April 2024, p. v.

¹⁰⁰ Ibid.

¹⁰¹ Animals Australia, *Speak up against the routine abuse of pigs in Victoria*, 2023, <<https://animalsaustralia.org/our-work/factory-farming/vic-pigs-submission-guide>> accessed 12 April 2024. For examples of submissions containing this text, see submissions 1, 89 and 238.

Processing Industry Animal Welfare Certification System (AAWCS), which is supported by the Australian Pork industry and the Australian Meat Industry Council (AMIC).¹⁰²

In other words, many claims of industry self-regulation related to the industry's involvement in the creation and subsequent enforcement of welfare standards. This section of the chapter considers the extent to which the industry can be described as self-regulated in this way.

For an examination of the pig industry's voluntary phase-out of sow stalls—which many stakeholders highlighted as an example of unacceptable industry self-regulation—see Chapter 5.

3.3.1 Industry's role in the development of legally enforceable standards

Many submitters described Victoria's animal welfare laws as simply giving force to standards, guidelines and codes of practice designed by the pig industry. Sonja Ristevski, for example, contended that because '[n]either state nor federal legislation specifically defines "best practice"' in relation to the welfare of pigs:

This ... permits the methods used to confine and slaughter pigs to be decided by the same industry that profits from killing them as efficiently as possible. There is no oversight nor input from independent experts whose primary focus is the welfare of the pigs. How does this not indicate an unjust conflict-of-interest?

Federal/ State Agricultural authorities are simply 'ticking off' the current methods used to farm and slaughter pigs. The **same Departments** are promoting the high productivity and profit by the pig industry. Again, a **clear conflict of interest**.¹⁰³

As noted in Section 3.2, there are three pig-related welfare standards enforced under Victorian law:

- the Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock (Land Transport Standard)
- the Victorian Standards and Guidelines for the Welfare of Pigs (Pig Welfare Standard)
- the Australian Standard for the Hygienic Production and Transportation of Meat Products for Human Consumption (the Australian Meat Standard).

¹⁰² Farm Transparency Project, *Victorian Pig Welfare Inquiry: Submission Template* (n.d.), <<https://www.farmtransparency.org/uploads/documents/Vic-Pig-Inquiry-Submissions-Template.pdf>> accessed 12 April 2024. For examples of submissions containing this text, see submissions 235, 322 and 361.

¹⁰³ Sonja Ristevski, *Submission 991*, p. 2.

The Land Transport Standard

The first of these standards, the Land Transport Standard, was developed ‘under the auspices of the Animal Welfare Committee, which is ultimately responsible to the Standing Council on Primary Industries,’ and in consultation with:

- state and territory governments
- livestock industry organisations animal welfare groups
- the general public.¹⁰⁴

The Pig Welfare Standard

The second standard, the Pig Welfare Standard, adopts the *Model Code of Practice for the Welfare of Animals: Pigs*, which was prepared by the then Animal Welfare Working Group.¹⁰⁵ Existing under the Primary Industries Ministerial Council—a Ministerial Council consisting of Australian and New Zealand Ministers with responsibility for primary industries—the Working Group comprised:

- representatives from State and Territory Government departments responsible for agriculture
- CSIRO
- Animal Health Australia
- the Department of Agriculture, Fisheries and Forestry.¹⁰⁶

The preface to the Code notes that the Working Group undertook extensive consultation with industry and animal welfare organisations.¹⁰⁷

Despite this consultation process, Animals Australia explained that, during the development of the Model Code:

most issues were not even adequately discussed and the draft Model Code was finalised by the Animal Welfare Working Group ... not the Code Review Reference Group (including Animals Australia and RSPCA Australia). As we formally stated to the Co-ordinator of the Code Review at the time, Animals Australia did not ‘sign off’ on the current Model Code because it allowed cruel practices (e.g., sow stalls, farrowing crates, and invasive procedures without anaesthesia or analgesia) to continue.¹⁰⁸

¹⁰⁴ Standing Council on Primary Industries, *Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock*, p. vii.

¹⁰⁵ Primary Industries Standing Committee, *Model Code of Practice for the Welfare of Animals—Pigs*.

¹⁰⁶ *Ibid.*, p. v.

¹⁰⁷ *Ibid.*

¹⁰⁸ Animals Australia, *Submission 232*, p. 8.

The Australian Meat Standard

The last of these standards, the Australian Meat Standard, was prepared by a committee comprising numerous bodies including health and agriculture departments and several livestock industry organisations.¹⁰⁹ Although the Standard was issued in draft form for comment, during which time it engaged expert individuals, it does not purport to have engaged animal welfare organisations. This reflects the fact that the Standard's primary objective is ensure the safety and wholesomeness of meat products,¹¹⁰ as opposed to animal welfare.

Conclusion

The Committee acknowledges that the development of the two livestock management standards—that is, the Land Transport Standard and the Pig Welfare Standard (which adopts the Model Code)—involved input from animal welfare organisations. Likewise, the creation of the Australian Meat Standard involved the engagement of expert individuals. Notwithstanding this engagement, the Committee notes that these processes also appear to have involved significant contributions from the pig industry—i.e., the industry for which these documents set standards and guidelines. Because of this, the Victorian pig industry has an undue influence on these practices.

The pig industry's involvement in the enforcement of these and other standards is considered in Section 3.4 below.

FINDING 3: The pig industry plays a significant role in the development of legally enforceable animal welfare standards, giving rise to the perception that it is self-regulated.

3.4 Regulation and audit

In Victoria, the laws and standards relating to the welfare of pigs—including farmed pigs—are enforced principally by regulatory bodies, as outlined above and in the relevant legislation. However, the pig industry itself also plays a significant role in regulating and assuring the welfare of pigs on Victorians farms and abattoirs, for example through the application of quality assurance programs and the use of on-farm veterinarians.

3.4.1 Enforcement by regulatory bodies

Victoria's animal welfare laws and corresponding standards are enforced primarily by the Department of Energy, Environment and Climate Action (through Agriculture Victoria), and PrimeSafe.

¹⁰⁹ Australia and New Zealand Food Regulation Ministerial Council, *Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS 4696:2007)*, p. vi.

¹¹⁰ *Ibid.*, p. iv.

Agriculture Victoria

The Department of Energy, Environment and Climate Action's joint submission with PrimeSafe explains that Agriculture Victoria has 'a range of regulatory responsibilities and strives to be a consistent, responsive and trusted regulator that acts appropriately and proportionally'.¹¹¹ As noted in Section 3.2, Agriculture Victoria administers:

- the Prevention of Cruelty to Animals Act and Regulations
- the Livestock Management Act, Regulations, and prescribed livestock management standards
- the Meat Industry Act and Regulations.

It is also responsible for enforcing the first two Acts, investigating animal welfare complaints involving 10 or more pigs.¹¹² Inspectors make use of the following tools:

- advisory letters
- warning letters
- notices to comply
- seizure
- infringement notices
- official warnings
- prosecution.¹¹³

Agriculture Victoria refers complaints involving less than 10 pigs to RSPCA Victoria and collaborates with PrimeSafe to investigate complaints relating to the operations of abattoirs.¹¹⁴

PrimeSafe

In its joint submission with the Department of Energy, Environment and Climate Action, PrimeSafe explains that it is 'the Victorian statutory authority for regulating the processing of meat, poultry and seafood in Victoria'.¹¹⁵ It controls and reviews standards relating to meat, licences meat processing facilities, and approves quality assurance programs.¹¹⁶ It also investigates certain matters, including licensees' compliance with:

- the Meat Industry Act and Regulations
- Codes of Practice

¹¹¹ Department of Energy, Environment and Climate Action and PrimeSafe Victoria, *Submission 425*, p. 3.

¹¹² *Ibid.*, p. 3.

¹¹³ *Ibid.*, p. 16.

¹¹⁴ *Ibid.*, pp. 3–4.

¹¹⁵ *Ibid.*, p. 4.

¹¹⁶ *Ibid.*

- quality assurance programs
- licence conditions (including compliance with the Australian Meat Standard).¹¹⁷

PrimeSafe explained that it ‘monitors compliance at meat processing facilities handling live animals via audits and inspectors’, including two unannounced animal welfare inspections each year.¹¹⁸ By arrangement, the Department of Agriculture, Fisheries and Forestry, ‘undertakes inspections and monitors compliance of all facilities that are licensed to export meat’.¹¹⁹

Conflict of interest

According to the Department of Energy, Environment and Climate Action’s most recent annual report, Agriculture Victoria supports the ‘agriculture, food and fibre sector’, for example by ‘working with community and industry to enhance productivity’ and ‘improve animal welfare’.¹²⁰

The Committee heard from many stakeholders that, despite being one of the principal regulators for pig welfare in Victoria, Agriculture Victoria’s responsibility to enhance productivity conflicts with its responsibility to improve animal welfare.

Lucy Thornton, for example, contended that there is an:

obvious structural problem when the government entity that oversees the interests of animal farming industries is also tasked with oversight of animal welfare. This is a clear conflict of interest, and the rights of animals will always lose out. Animals have little to no voice in this current framework, as the government is not able to effectively monitor or enforce the standards.¹²¹

Arguing that ‘[t]he current regulatory framework is failing pigs and their welfare’, Leigh Hornsby likewise claimed that:

There is such a massive conflict of interest when the authority responsible for the pigs welfare is also the same authority that is promoting productivity and profits.¹²²

Concerns about the Departments’ conflicting interests was echoed in numerous other submissions.¹²³ Calls for an independent body to monitor compliance with animal welfare laws and standards are considered below in Section 3.7.1.

¹¹⁷ Ibid., p. 17.

¹¹⁸ Ibid., p. 15.

¹¹⁹ Ibid., p. 10.

¹²⁰ Department of Energy, Environment and Climate Action, *Annual Report 2022–23*, Department of Energy, Environment and Climate Action, 2023, p. 21.

¹²¹ Lucy Thornton, *Submission 261*, p. 2.

¹²² Leigh Hornsby, *Submission 281*, p. 1.

¹²³ See, for example, submissions 84, 361, and 511.

3.4.2 Independent auditing

As well as enforcement through the legislative framework, the pig industry undergoes independent auditing. In its submission, Australian Pork Limited contended that:

The Australian pork industry is one of the most independently audited and regulated industries. It operates under an array of regulatory frameworks ... which are enforced through a range of compliance activities undertaken through visits from authorised officers, independent audits, market requirement audits, associated record keeping and declarations.¹²⁴

Australian Pork Limited recommended that the Committee recognise ‘the substantial the substantial State and Federal regulatory frameworks and industry frameworks which the Victorian pig industry operates within’.¹²⁵

The Committee received substantial evidence about two independent auditing programmes in particular:

- the Australian Pork Industry Quality Assurance Program (APIQ✓[®])
- the Australian Livestock Processing Industry Animal Welfare Certificate System (AAWCS).

The Committee was also told about the role of veterinarians in ensuring compliance with animal welfare standards and guidelines.

APIQ✓[®]

Australian Pork Limited highlighted the industry’s commitment to independent auditing through the APIQ✓[®], ‘the most widely adopted quality assurance ... program for pig producers in Australia, with 91% of Australian production voluntarily adopting the program nationally’.¹²⁶

According to Australian Pork Limited’s website, APIQ✓[®] is industry sponsored.¹²⁷ It explains that APIQ✓[®] was ‘created with input from a wide range of industry stakeholders’, and that ‘Australian Pork Limited is the nominated steward for the program on behalf of the industry’.¹²⁸ It also identifies AUS-MEAT as the ‘contracted third party auditing organisation who conduct independent third-party annual compliance audits of all certified producers’.¹²⁹

Per the APIQ✓[®] Standards, against which APIQ✓[®] certified producers are audited, ‘APIQ✓[®] Certification incorporates the legal requirements set out in the Model Code’,

¹²⁴ Australian Pork Limited, *Submission 543*, pp. 7.

¹²⁵ *Ibid.*, p. 8.

¹²⁶ *Ibid.*, p. 27.

¹²⁷ Australian Pork Limited, *APIQ administration*, <<https://australianpork.com.au/apiq/apiq-administration>> accessed 24 April 2024.

¹²⁸ *Ibid.*

¹²⁹ *Ibid.*

and '[c]ertification enables producers to demonstrate that they are meeting relevant State and Federal legislation and following good agricultural practice'.¹³⁰

Explaining that APIQ[®] Standards compliment and reinforce the existing legislative requirements, Apiam Animal Health, a veterinarian group, stated that:

Through this program producers are independently audited annually, by a third-party auditing organisation. Annual internal audits are also required, which can be completed by the farm vet or a vet independent to the farm. Any serious breach of the Model Code is considered a Critical Corrective Action Required (CCAR) under APIQ[®] which necessitates immediate corrective action and the potential loss of accreditation.¹³¹

Further, the Victorian Farmers Federation outlined that:

While the Model Code outlines minimum welfare standards, APIQ standards exceed these, with 91% of commercial Australian pig farmers APIQ accredited. This accreditation requires independent annual audits by third party auditors, AUS-MEAT, and mandates six-monthly internal audits.¹³²

In its submission, AUS-MEAT explained that, 'through [its] role in working with various sectors of the livestock supply chain, [it] routinely observes the dedication of livestock producers to animals in their care'.¹³³ AUS-MEAT also contended:

It is through support of industry programs such as APIQ that government and industry alike can drive change (where needed) and provide a platform for continued education and routine assessment to ensure evolving consumer and stakeholder expectations with respect to animal welfare and other issues alike are met.¹³⁴

PIC Australia, a pig breeding and technology company, argued that:

the scope, application, compliance with and enforcement of regulatory frameworks for pig producers, which is supported by the industry's quality assurance program APIQ, is satisfactory not only as regards compliance but also the collective ability of both APIQ and the frameworks to promote best practice pig welfare outcomes.¹³⁵

The Committee received submissions from a number of pork producers running APIQ[®] accredited farms, who explained that with accreditation:

I can give my customers assurance of the standards that are in place on my operation. I must adhere to seven core standards across Food Safety, Animal Welfare, Biosecurity, Traceability, Environment, Transport and Management.¹³⁶

¹³⁰ Australian Pork Industry Quality Assurance Program, *Standards Manual*, 2022, <https://australianpork.com.au/sites/default/files/2022-11/APIQ_Standards_Manual_V5.2_12_2022.pdf> accessed 26 April 2024, p. 5.

¹³¹ Apiam Animal Health, *Submission 365*, p. 3.

¹³² Victorian Farmers Federation, *Submission 2157*, p. 7.

¹³³ AUS-MEAT, *Submission 871*, p. 2.

¹³⁴ *Ibid.*

¹³⁵ PIC Australia, *Submission 139*, p. 1.

¹³⁶ See, for example, submissions 589, 718, and 787.

At a public hearing, pork producer Tim Kingma also outlined his experience with APIQ[®]:

APIQ – how I work with it on my farm is we do continuous staff training. Our system – we have monthly training, so if there is ever a change in APIQ we will talk about it at staff level. Then for me it is around having our standard operating procedures or SOPs for all the different procedures we do on our farm. The staff are trained in that, and we are continually upgrading and improving. Then we do an internal audit as a business, and I choose to bring in a third party for that actual internal audit, because I think that is beneficial to the staff and our business. Then we have our annual audit that is third party, which I pay for, and it gets done.¹³⁷

Australian Livestock Processing Industry Animal Welfare Certificate System (AAWCS)

Alongside the APIQ[®], the AAWCS is ‘an independently audited certification program used by livestock processors to demonstrate compliance with industry best practice animal welfare standards ... from receipt of livestock to the point of humane processing’.¹³⁸ The program was developed in 2013 by the Australian Meat Industry Council (AMIC), in collaboration with the Australian Meat Processor Corporation and AUS-MEAT.¹³⁹ Like APIQ[®], it is ‘independently audited and administered’ by AUS-MEAT.¹⁴⁰ In its submission, AMIC explained that AAWCS has ‘been in use for over a decade and covers >80% of livestock processed in Australia annually’.¹⁴¹ AMIC noted that of Victoria’s 28 export abattoirs and 14 domestic abattoirs, 19 are certified under the AAWCS.¹⁴²

Livestock processing facilities certified with the AAWCS must comply with AMIC’s Industry Animal Welfare Standard for Livestock Processing Establishments Preparing Meat for Human Consumption. Developed ‘to reflect the expectations of both the Australian meat processing industry and the community regarding the management of livestock at Australian livestock processing establishments’,¹⁴³ the Standard covers a number of things, including:

- management systems, document control, and performance evaluation
- human and physical resources
- livestock handling and daily management
- humane stunning and sticking processes.¹⁴⁴

¹³⁷ Tim Kingma, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 25.

¹³⁸ Australian Meat Industry Council, *Submission 584*, p. 5.

¹³⁹ AAWCS, *Australian Livestock Processing Animal Welfare Certification System*, <<https://aawcs.com.au>> accessed 26 April 2024.

¹⁴⁰ Australian Meat Industry Council, *Submission 584*, p. 6.

¹⁴¹ *Ibid.*, p. 4.

¹⁴² *Ibid.*, pp. 3–4.

¹⁴³ Australian Meat Industry Council, *Industry Animal Welfare Standard for Livestock Processing Establishments Preparing Meat for Human Consumption*, 2022, <https://amic.org.au/wp-content/uploads/2021/10/AMIC-Ed-3-Industry-Animal-Welfare-Standard_Final-effective-1-Jan-2022.pdf> accessed 26 April 2024, p. 2.

¹⁴⁴ *Ibid.*, p. 3.

Livestock processing facilities certified with the AAWCS must comply with the accompanying Rules, Standards, and relevant animal welfare laws and regulations. To become certified, facilities must undergo an initial verification audit, and to remain certified, must undergo annual continuing verification audits.¹⁴⁵ Like APIQV[®], AAWCS also requires internal audits.

As with APIQV[®], the Committee received evidence from stakeholders that questioned the efficacy of programs like the AAWCS.

Ellie Rodes suggested that '[t]he reliance on schemes like the [AAWCS] supported by industry groups may compromise the objectivity and effectiveness of enforcement'.¹⁴⁶ She called for the Government to:

Discontinue reliance on industry-backed certification schemes, such as the Australian Livestock Processing Industry Animal Welfare Certification System (AAWCS), and establish a robust, independent oversight mechanism. This will mitigate conflicts of interest and provide an impartial assessment of compliance.¹⁴⁷

Noting 'the apparent breaches of standards exposed by the Farm Transparency Project', Fiona Bannister contended that '[t]he outsourcing of enforcement to industry-backed certifications, such as [AAWCS] needs thorough reconsideration'.¹⁴⁸

Arguing that 'enforcement often relies on industry self-monitoring and certification schemes like the AAWCS, supported by the pork and meat industry bodies', Aditi Basu questioned 'the effectiveness of such self-regulation, particularly in light of past promises like the industry-led sow-stall phase-out that have faced criticism for incomplete implementation'.¹⁴⁹

Veterinarians

Alongside formal independent auditing programs, the Committee received evidence about the role of veterinarians in ensuring and promoting the welfare of pigs on farms.

Emphasising that '[v]eterinarians are well aware of the regulatory frameworks in place in their jurisdiction of practice', Apiam Animal Health and the Australian Veterinary Association contended that:

Through regular on farm consultations, stockperson training and internal audits, veterinarians represent an unofficial avenue of enforcement of these animal welfare standards.¹⁵⁰

¹⁴⁵ AUS-MEAT, *Australian Livestock Processing Industry Animal Welfare Certification System (AAWCS) Program Rules*, 2021, <<https://aawcs.com.au/wp-content/uploads/2022/02/AUS-MEAT-AAW003-AAWCS-Certification-Program-Rules-December-2021.pdf>> accessed 26 April 2024, p. 9.

¹⁴⁶ Ellie Herodes, *Submission 776*, p. 2.

¹⁴⁷ *Ibid.*, p. 3.

¹⁴⁸ Fiona Bannister, *Submission 983*, p. 2.

¹⁴⁹ Aditi Basu, *Submission 1949*, p. 2.

¹⁵⁰ Apiam Animal Health, *Submission 365*, p. 2; Australian Veterinary Association, *Submission 860*, p. 2.

Australian Pork Limited likewise confirmed that:

The majority of commercial pig farms in Australia utilise the services of a veterinarian and a specialist nutritionist. A relationship with a veterinarian is a requirement for APIQ✓[®] accreditation. These specialist professionals are an intrinsic part of Australian pig production and provide clear advice and support to producers.¹⁵¹

One pig producer explained that they ‘engaged a specialist pig animal health veterinarian to visit [their] farms on a 6 weekly basis to monitor animal welfare, health and production to ensure [they] continually provide for all the pigs needs’.¹⁵²

Rick O’Reilly, a Manager at Midland Bacon, explained that as well as an external audit by AUS-MEAT, Midland Bacon undergoes:

an internal audit by Apiam Animal Health, which is Australia’s largest rural and regional veterinary group, with a pig specialty. In addition to the annual audit, we have two allocated vets from Apiam’s ProSwine team, who do a minimum of four farm visits a year, with additional diagnostics and abattoir health checks done as required. I meet with our ProSwine vets and other senior Apiam staff on average once a month.¹⁵³

Regarding changes the pig industry has made to ensure the best animal welfare, pork producer Tim Kingma explained:

I have been working on our family farm for 20 years. I think the relationships we have are some of the biggest changes. You know, with your farm vet, you are not seeing them once a year, which happened 20 years ago, you are talking to them weekly. Your key staff will ring straight directly to the farm vet. I would imagine as farms get bigger they employ their own veterinarians as well.¹⁵⁴

Farmer David Wright told the Committee about the importance of on-farm veterinarians in improving animal welfare outcomes:

That is the great thing about our industry: our vets are pig vets, so they also invest in research and work for us to find better ways. If there is new, improved stuff overseas they will bring it into our farms to trial, so our vets actually work with us to work through those things and get the best procedures and the best results.¹⁵⁵

The Australian Veterinary Association’s Dr Melanie Latter recommended the use of dedicated veterinarians or animal welfare officers on domestic abattoirs:

We have observed that having a veterinarian at an export abattoir or a dedicated animal welfare officer we feel does tend to raise the standards of animal welfare oversight, and we recommend that that is also in place at domestic abattoirs.¹⁵⁶

¹⁵¹ Australian Pork Limited, *Submission 543*, p. 19.

¹⁵² Name Withheld, *Submission 811*, p. 2.

¹⁵³ Rick O’Reilly, *Submission 1250*, p. 1.

¹⁵⁴ Tim Kingma, *Transcript of evidence*, p. 26.

¹⁵⁵ David Wright, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 34.

¹⁵⁶ Dr Melanie Latter, National Manager, Policy and Veterinary Science, Australian Veterinary Association, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 34.

The Committee also received numerous submissions from pig veterinarians employed by Apiam Animal Health which contained the following paragraph:

Commercial pig farms in Australia utilise the services of highly skilled professionals such as veterinarians such as myself, nutritionists, and other highly skilled/experienced people. I am proud to provide research-based advice and professional services to producers, and support to other relevant key stakeholders in our industry. Animal welfare is a key part of my veterinary practice, and is considered in conjunction with biosecurity, environmental management, human workplace health and safety as well as product quality and safety.¹⁵⁷

Conclusion

As outlined in the next section, there are numerous issues with industry self-regulation when it comes to the enforcement and promotion of animal welfare standards. The Committee recognises the dangers of relying on the industry to regulate itself and emphasises the need for Victorian legislation to mandate higher welfare standards.

3.4.3 Increasing transparency in the regulation and audit processes

Despite the work of Victoria's regulatory bodies—and despite Victorian pig industry's efforts to self-regulate beyond the minimum standards prescribed by law—there are numerous issues with the state's regulatory and auditing processes, particularly in relation to transparency.

Permitting unannounced, ad hoc inspections of facilities

Animals Australia's Glenys Oogjes told the Committee that 'regulators ... are not well resourced these days', and that 'the industry's own [quality assurance] programs are there ... but again, they are only based on the current codes, which are, as we have indicated, inadequate standards'.¹⁵⁸

The other issue is of course that they are being audited, and the audit results, if you like, are with APIQ. It is not transparent. It is not a publicly available test, if you like. It is also a real concern with APIQ, for example, where there is no notice given of audits. I understand this is something that happens of course, but I have sadly learned from whistleblowers what happens before an audit – when everything is fixed up, when they know that they are coming on a certain day. So it does not give us confidence, and that takes us back to the very discussion we had very early on. The public, the community and I cannot have a lot of confidence in what is happening when you cannot see what is happening.¹⁵⁹

¹⁵⁷ See, for example, submissions 284, 366 and 393.

¹⁵⁸ Glenys Oogjes, Chief Executive Officer, Animals Australia, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 52.

¹⁵⁹ *Ibid.*

Dr Jed Goodfellow, Co-Founder of the Australian Alliance for Animals, told the Committee that there is no transparency around Victoria's enforcement scheme, and called for POCTA Inspectors to be able to perform unannounced inspections:

We do not know who is conducting inspections, how often those inspections are conducted or what the results of those inspections are. There is limited to no transparency around that compliance monitoring system. My understanding is that in Victoria, under the current *Prevention of Cruelty to Animals Act*, there is no power for engaging in unannounced inspections to conduct audits of facilities, whereas that power does exist in other states and territories. That would be certainly something we would encourage committee members to consider, to create a more robust arrangement for on-the-spot inspections, but also for whatever the relevant department is – Agriculture Victoria – to be more transparent about providing information relating to those compliance monitoring activities on their website so that people can see that there is actually a system in place that is being operationalised and enforced.¹⁶⁰

Farm Transparency Project's Chris Delforce also recommended that regulatory bodies be given the power to perform 'unannounced inspections', as well as 'the ability to seize footage immediately and review it'.¹⁶¹

The Committee understands that PrimeSafe conducts unannounced, ad hoc inspections of livestock processing facilities. However, the same does not appear to be true for Agriculture Victoria under the Prevention of Cruelty to Animals Act.

FINDING 4: In light of concerns around the transparency of Victoria's regulation and audit processes, inspectors under the *Prevention of Cruelty to Animals Act 1986 (Vic)* and *Livestock Management Act 2010 (Vic)* should be given the power to instigate unannounced and ad-hoc inspections.

RECOMMENDATION 2: That the Victorian Government grant welfare inspectors the power to instigate unannounced and ad-hoc inspections of facilities.

Mandating closed-circuit television in abattoirs and farms

The Committee received a considerable amount of evidence in relation to mandating the use of closed-circuit television (CCTV) in Victorian abattoirs, as well as in Victorian farms, to increase transparency in the regulation and audit processes.

¹⁶⁰ Dr Jed Goodfellow, Co-Founder and Director, Policy and Government Relations, Australian Alliance for Animals, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, pp. 3-4.

¹⁶¹ Chris Delforce, *Transcript of evidence*, p. 21.

The issue of making CCTV mandatory in abattoirs was previously considered by the Legislative Council Economy and Infrastructure Committee in its *Inquiry into the impact of animal rights activism on Victorian agriculture*, which recommended:

That following consultation with industry, unions and other relevant stakeholders, the Victorian Government consider the implementation of closed-circuit television cameras in Victorian abattoirs with a legislative model similar to the Mandatory Use of Closed Circuit Television in Slaughterhouses (England) Regulations 2018.¹⁶²

In its response to the Committee's Final Report, the Victorian Government supported this recommendation, as well as 'any voluntary measures by industry that improve and support high standards of animal welfare'.¹⁶³

The proposed Animal Care and Protection Action Bill, however, which is intended to replace the Prevention of Cruelty to Animals Act, does not appear to require abattoirs to install CCTV. Nor does the Department of Energy, Environment and Climate Action's joint submission with PrimeSafe Victoria indicate any intentions on the part of the Victorian Government to introduce such a mandate. The submission does note the potential for the issue to be explored in the process of updating the Australian Animal Welfare Standards and Guidelines:

The [Animal Welfare Task Group] is currently developing Australian Animal Welfare Standards and Guidelines for Livestock at Processing Establishments (Processing S&G). These will replace the current 2001 Model Code of Practice for the Welfare of Animals: Livestock at Slaughter Establishments.

The project to develop the new Processing S&G is being led by the Queensland Department of Agriculture and Fisheries. Agriculture Victoria is an active participant in the process. The project provides opportunity to explore current CCTV use at processing facilities and the appetite for adopting CCTV in abattoirs more broadly across Australia. This work will inform the approach to considering CCTV in Victorian abattoirs. Public consultation on the Processing S&G is expected to occur in 2024.¹⁶⁴

Despite current legislation not requiring the use of CCTV, the industry was influenced to consider implementing such requirements following a story on the ABC's 7.30 in March 2024 exposing footage of bestiality, specifically a pig being sexually penetrated, on a Victorian farm by a male staff member. Martin Clark, a pork producer in the Western District, told the Committee about his reaction to footage he'd seen of poor animal welfare practices:

We have seen some of the videos and that over time, which disappoint me. Whether they are fact I do not know, but they look horrific. Those sorts of people, if that is the case, need to be brought in line. Everyone has got a bad apple somewhere, whether

¹⁶² Parliament of Victoria, Economy and Infrastructure Committee, *Inquiry into the impact of animal rights activism on Victorian agriculture*, February 2020, p. 103.

¹⁶³ Government of Victoria, *Response to the Parliament of Victoria, Economy and Infrastructure Committee, Inquiry into the impact of animal rights activism on Victorian agriculture*, May 2020, p. 9.

¹⁶⁴ Department of Energy, Environment and Climate Action and PrimeSafe Victoria, *Submission 425*, pp. 15-16.

it is a thug on the football field or whatever. But they need to be penalised, and I do not think the penalties are harsh enough, to be honest, to keep our industry at best practice.¹⁶⁵

The day after the story aired on 7.30, the Australian Meat Industry Council released a statement that its National Processor Council had ‘determined, after extended consideration, to endorse the incorporation of Video Surveillance Systems (VSS) as a mandatory requirement of the *Australian Livestock Processing Industry Animal Welfare Certification System*’.¹⁶⁶ As stated in the media release, accreditation under the Australian Livestock Processing Industry Animal Welfare Certification System is voluntary, ‘but now covers over 80% of cattle, sheep and pigs processed in Australia’.¹⁶⁷ This announcement contrasts with earlier statements by the Council in which it supported the voluntary but not mandatory installation of CCTV as a tool for monitoring animal welfare practices. For example, in April 2023 AMIC stated:

In addition to the lack of evidence that CCTV in processing facilities results in better animal welfare outcomes, AMIC does not support mandatory CCTV due to a wide array of concerns, including privacy, cyber security, potential misrepresentation, misuse of footage in case of a data breach, and added cost imposed on industry and regulators.¹⁶⁸

In announcing its plans to make CCTV as a mandatory requirement, AMIC explained that it:

... will establish a drafting committee of experts, including RSPCA Australia, to update the AAWCS standards and work through necessary changes to the program over the coming months. AAWCS certified establishments will be required to have a functional VSS installed in their facilities to monitor livestock handling processes from the point of receipt through to the point of slaughter from 2026.¹⁶⁹

Notwithstanding the gradual move by animal agriculture industries towards the use of CCTV on abattoirs, the Committee heard from various animal welfare organisations about the need for a mandated approach.

Animals Australia recommended that, ‘[w]hile CO₂ stunning occurs’, CCTV systems be ‘mandated to visualise pigs inside CO₂ systems’, and that regulators undertake evaluation of this footage.¹⁷⁰ It explained that:

Despite records of CO₂ systems in use in Australia as far back as the early 1990s, the 2014 expose was the first-time the public (anywhere in the world) was able to view footage of pigs inside these systems. There remain no standardised state or nationwide

¹⁶⁵ Martin Clark, Murnong Farming, public hearing, Melbourne, 13 March 2024, Transcript of evidence, p. 50.

¹⁶⁶ AMIC, *Meat Industry to Incorporate Mandatory Video Surveillance Systems in Animal Welfare Certification System*, 11 March 2024, <<https://amic.org.au/meat-industry-to-incorporate-mandatory-video-surveillance-systems-in-animal-welfare-certification-system>> accessed 22 April 2024.

¹⁶⁷ Ibid.

¹⁶⁸ AMIC, *MEDIA STATEMENT: CCTV in Livestock Processing Facilities*, 20 April 2023, <<https://amic.org.au/media-statement-cctv-in-livestock-processing-facilities>> accessed 22 April 2024.

¹⁶⁹ AMIC, *Meat Industry to Incorporate Mandatory Video Surveillance Systems in Animal Welfare Certification System*.

¹⁷⁰ Animals Australia, *Submission 232*, p. 14.

regulatory requirements for animal welfare monitoring (e.g., CCTV) inside the system or reporting of pigs' response to CO2 inside these systems. Indeed, we have concerns whether anyone is routinely monitoring pigs inside the gondolas.

...

Animals Australia questions how abattoir staff, the industry peak body and the regulators are currently monitoring pigs' reaction to CO2 in large commercial systems. According to Grandin, this "will require the use of video cameras installed in the pit", But as there is no standardised requirement for all abattoirs using CO2 systems in Australia to have CCTV installed in the pit so how are they monitoring the pigs and assessing their welfare?¹⁷¹

In a public hearing, Shatha Hamade, Legal Counsel for Animals Australia, stressed the importance of independent monitoring of this footage:

Indeed, and you can write all the laws you want and put in these particular powers, but they are only as good as they are enforced. So that is why obviously the hot issue is CCTV cameras so that there is consistent monitoring, but that needs to go a step further because there needs to be independent monitoring. We have had investigations that have been exposed publicly to the media of systemic, endemic, entrenched issues within slaughterhouses – multiple slaughterhouses – which actually had CCTV cameras. This behaviour has been going on, and a few of them had been dealt with years before. So without the independent monitoring there is no point.¹⁷²

Contending that 'PrimeSafe inspections have proven to be unable to detect noncompliance with the standards it has set', Brendan Rose likewise recommended:

The installation of 24/7 CCTV surveillance in all Victorian abattoirs and PrimeSafe compliant meat processing facilities, to be reviewed by both PrimeSafe inspectors and private auditors.¹⁷³

The Committee also received a number of submissions that contained the following paragraph, recommending that a CCTV mandate be enshrined in legislation, and noting international precedents for doing so:

The public in Australia, including farmed animal producers, cannot currently be fully informed about slaughter practices at abattoirs. In contrast, the UK, Spain, Israel, and several local European jurisdictions have implemented mandatory CCTV with third party monitoring. Queensland introduced similar requirements for facilities that slaughter horses (Australian Alliance for Animals, 2023b). The committee should recommend legislation that mandates CCTV in all Victorian abattoirs, including visibility inside areas where animals are being stunned. The legislation should also provide powers for authorised officers to review the footage. A legal, government-regulated animal industry has absolutely no need to hide its operations behind closed doors.¹⁷⁴

¹⁷¹ Ibid.

¹⁷² Shatha Hamade, Legal Counsel, Animals Australia, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 52.

¹⁷³ Brendana Rose, *Submission 292*, p. 4.

¹⁷⁴ See, for example, submissions 337, 395, and 586.

Noting that Woolworths Group claims to have CCTV in place in all its pork abattoirs, Jan Kendall questioned:

How come their much-vaunted CCTV missed the pig gassing horror? Can I, the consumer, request to look at the CCTV to satisfy myself that what is going on is humane? I doubt even a journalist would be allowed access, let alone an animal welfare organisation.¹⁷⁵

Jan Kendall called for legislation that required the installation of CCTV in farm sheds and slaughterhouses, and the regular monitoring of CCTV footage by ‘independent pig welfare experts who have no affiliation with the industry or supermarkets’.¹⁷⁶

Likewise, RSPCA Victoria recommended that:

Remote monitoring (e.g. CCTV) equipment must be installed at slaughtering facilities and reviewed for internal plant operation. This equipment must allow a clear view of all areas where live animal handling occurs, including unloading facilities, lairage areas, restraint, stunning, shackling, and sticking processes.¹⁷⁷

Acknowledging and praising the Australian Meat Industry Council for introducing CCTV into its quality assurance scheme, Co-Founder of the Australian Alliance for Animals Dr Jed Goodfellow nevertheless called for CCTV monitoring to be introduced into legislation:

And we acknowledge AMIC’s – the Australian Meat Industry Council – announcement yesterday that they would require it as part of their industry QA scheme; however, we do think that that still needs to be reflected in both federal and state law as well. It is one thing for the industry’s own QA scheme to require this, which is a very positive thing, and we congratulate AMIC for coming to the table on that, but that footage does need to be made available to state and federal regulators as well to monitor compliance. If the industry accepts that CCTV video surveillance is an effective compliance tool for monitoring standards of animal welfare, then that equally applies to allowing regulators access to that footage to monitor compliance as well.¹⁷⁸

The Committee also received evidence from stakeholders, including members of the public, who recommended that CCTV footage be made public. In calling for CCTV to be installed in all farms and slaughterhouses, Lauren Thomas, a self-described animal lover, stated:

I believe there should be mandatory CCTV in all farms and slaughterhouses, and all the footage should be uploaded to a website that is publicly available for anyone to view, so that all consumers can see exactly what they are paying for and make informed buying decisions.

¹⁷⁵ Jan Kendall, *Submission 1480*, p. 4.

¹⁷⁶ *Ibid.*, p. 10.

¹⁷⁷ RSPCA Victoria, *Submission 1358*, p. 4.

¹⁷⁸ Dr Jed Goodfellow, *Transcript of evidence*, p. 8.

A link to this website (where anyone can access the footage) should be legally required to be on the packaging of all pork, bacon, ham and all pig meat products.¹⁷⁹

Likewise, Dale Morrison argued:

The fact that these conditions [on abattoirs] were not exposed until some activists trespassed with cameras is a condemnation of the abattoirs, the industry, and the government which is meant to be regulating them. It's a good thing that this inquiry is happening, but if this industry was up to par or if the government was doing a satisfactory job of regulating them, we would not need people trespassing with cameras to bring welfare issues to our attention, because the issue would've been handled already. Public CCTV keeps everyone honest[.]¹⁸⁰

In a public hearing, Farm Transparency Project's Chris Delforce emphasised the importance of making footage public:

Well, there is a lot of talk around CCTV. Our belief is that this CCTV needs to be publicly accessible, because otherwise whichever third party it is that is monitoring the CCTV is bound to whatever poor welfare laws exist at the time. If there is cruelty happening but it is legal, there is nothing they can do about it – the CCTV has not achieved anything. But if it is publicly accessible and any member of the public can log in and see what is happening and make up their own mind as to whether they support it or groups like us can then review that footage and if we see something happening, we can report it to the authorities, then we have got no reason to trespass. If these industries are transparent on their own, we have got no reason to force that transparency on them.¹⁸¹

As well as animal welfare stakeholders, the Committee received evidence from stakeholders within the pig industry about the use of CCTV for monitoring welfare requirements.

In line with its policy on the humane slaughter of livestock, the Australian Veterinary Association recommended that:

Irrespective of stunning method, abattoirs in Australia should install Closed Circuit Television Cameras (CCTV) to assist in monitoring animal welfare requirements. CCTV would allow establishments to observe and verify handling, stunning and slaughter operations, and inform training requirements.¹⁸²

In a public hearing, the Australian Veterinary Association's Dr Melanie Latter elaborated that the use of CCTV in abattoirs would improve transparency and could help address the issue of illegal trespass on abattoirs by animal activists:

And the other thing that we, AVA, advocates is CCTV in abattoirs for transparency, and it goes back to the question earlier about people entering facilities illegally. If there is better transparency and the community has confidence from things like CCTV and

¹⁷⁹ Lauren Thomas, *Submission 291*, p. 19.

¹⁸⁰ Dale Morrison, *Submission 566*, p. 2.

¹⁸¹ Chris Delforce, *Transcript of evidence*, p. 21.

¹⁸² Australian Veterinary Association, *Submission 860*, p. 5.

knowing that there are regular welfare audits and that it is all done in a transparent and reportable way, that can help reduce that sort of activity of people feeling like, 'Well, we don't know what's going on; we have to go in there and film it covertly.' So all of those things would assist in sort of addressing some of those issues.¹⁸³

Tim Ryan from the Australian Meat Industry Council supported making CCTV footage available to regulators, but doubted the public's desire to view this footage:

I do not think the general public want to see it. They understand that an animal has to be processed. They want to be assured that it is done humanely and respectfully. They want to know that the regulator has sufficient oversight, but they do not want to see the process necessarily. That is what we hear from consumer research. I think the groups that do want to see it are the ones that we heard from yesterday. We need to strike the right balance in how we can assure consumers in the community that we are doing enough, that we are meeting all our regulatory responsibilities and that the regulator has oversight. But at the same time we need to respect the workplace, and these are people's lives; they come to work every day, and we need to respect their privacy.¹⁸⁴

Mr Ryan also acknowledged the importance of CCTV in assuring the public that pigs were being processed for meat:

I think consumers want to know that the meat they consume has been processed in a way that is humane and respects the animal; that is part of the process to produce food. I think we can provide those assurances, particularly with our latest announcement on CCTV that will further add that certainty and I suppose quell some of the noise coming from these more radical groups. But I think the hard data speaks for itself, given that people and Australians and Victorians eat meat regularly. Pork for instance is a growing protein, and in this context I do not think consumers are walking away at all.

Speaking to the Committee, pig farmer Tim Kingma expressed concerns around making CCTV footage available to regulators, stating '[t]here are a lot of privacy issues around filming people ... I do not know all the laws there'.¹⁸⁵ Regarding whether he would be comfortable with providing CCTV footage to regulators, David Wright explained that:

I think once we sat down with the regulators and worked through why, what, where and how, we would come to determine what we were going to do and make the commercial decision once we know what it is.¹⁸⁶

Margo Andrae, Chief Executive Officer of Australian Pork Limited, outlined other ways in which the pig industry is committed to transparency, including via virtual tours:

[O]ne of the things we always try to do is explain to people not only what we do but why we do it. So we launched a full paddock-to-plate, almost, virtual tour which

¹⁸³ Dr Melanie Latter, *Transcript of evidence*, p. 24.

¹⁸⁴ Tim Ryan, *Transcript of evidence*, p. 19.

¹⁸⁵ Tim Kingma, *Transcript of evidence*, p. 32.

¹⁸⁶ David Wright, *Transcript of evidence*, p. 32.

explained in detail exactly why we do what we do. I would have full hope that the community would support us in the fact that terminating a life that needed to be terminated right then and there was done in the most instant, humane way possible. So I believe – you said at the beginning of your question what you believe – the community would actually understand why we do what we do. But we go above and beyond that in terms of explaining that through our virtual tour and through our research. And I need to be clear, Chair, if there are things we can be improving, we will always be doing it. Our industry has invested millions of dollars in ensuring that we have the latest infrastructure and ensuring we have the latest training. We have incredibly qualified animal welfare experts. We have I think more PhD people across our industry within the farming practices across the supply chain. In terms of CCTV, we did see a change in that, but I will not go into detail with that because the next witness will be able to talk about that. But I think in terms of transparency, our view is that it is telling people what we do and why we do it, and we have gone above and beyond to do that[.]¹⁸⁷

The Committee notes that the virtual tour referenced by Ms Andrae does not include CCTV in the gondolas where the pigs are gassed.

President of the Victorian Farmers Federation Emma Germano noted:

I do understand that there is an argument that says, ‘Well, if we weren’t here trespassing, no-one would know.’ I think that it is prevalent upon the food production industry to demonstrate that transparency.¹⁸⁸

However, in relation to CCTV, Ms Germano emphasised the importance of protecting workers’ privacy, and noted other work the industry is doing to ensure transparency:

There are many industries that do not have mandatory CCTV footage in place, despite there being particular vulnerabilities, that is live streamed to the public for multitudes of reasons, including protecting the privacy of people who work in those establishments. I have really grappled with this personally – this particular issue around transparency. If you want to find out what happens on a farm, to suggest that you cannot find out I think is a fallacy. You absolutely can. There are many producers who will, within biosecurity constraints, allow you to have a look at how their businesses operate. Again, to reference the vice-president of the Victorian Farmers Federation, she set up a virtual reality experience. You can actually look through her caged chicken facility – egg facility – in Werribee South and you can see with full transparency. I think to suggest that people do not know what happens to an animal in order for it to get to their plate is a gross exaggeration, and to say that people are now turning away from the industry because of the exposes I also think is not correct.¹⁸⁹

Edison Alvares, Chief Operating Officer of JBS Australia’s Pork Division, explained that while the company’s processing facilities do use CCTV, they do not have CCTV installed

¹⁸⁷ Margo Andrae, Chief Executive Officer, Australian Pork Limited, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 5.

¹⁸⁸ Emma Germano, President, Victorian Farmers Federation, public hearing, Melbourne, 13 March 2014, *Transcript of evidence*, p. 62.

¹⁸⁹ *Ibid.*, p. 66.

on the gondolas used for CO2 stunning.¹⁹⁰ Regarding whether he would support ‘mandatory CCTV of gassing of pigs’, he explained that he would ‘if it was to increase animal welfare in any shape or form ... but there is no evidence at all that it would’.¹⁹¹ The Committee notes that, as a result of illegally obtained footage of the CO2 gassing of pigs, there has been a greater call for transparency in Victorian abattoirs. The Committee praises the Australian Meat Industry Council for its commitment to introduce mandatory CCTV in its audit process.

Notwithstanding these innovations by industry, there is an opportunity for Victoria to take a lead in advancing pig welfare on both slaughterhouses and farms by introducing mandatory CCTV in all meat processing and farming facilities. Despite calls for CCTV footage to be made publicly available, the Committee understands the need to protect the privacy and wellbeing of stockpeople and workers in abattoirs. It believes a requirement for this footage to be made available annually to independent regulators is adequate to ensuring adherence to relevant laws, standards and relation in relation to the welfare of pigs.

FINDING 5: In conjunction with other work done by the pork industry, mandating closed-circuit television in processing and farming facilities would increase transparency in the regulation and audit processes.

RECOMMENDATION 3: That the Victorian Government impose mandatory closed-circuit television in all processing and farming facilities to be made available to regulatory bodies for independent audit(s).

3.5 The chimera of ‘best practice’

Throughout this Report—and in particular Chapters 4, 5, and 6—the Committee reflects on ‘best practice’ standards and guidelines for pig welfare in Victoria. In doing so—and in accordance with term five of the Inquiry’s Terms of Reference—it considers ‘international comparisons to determine industry adherence to different forms of confinement’, and other issues relevant to pig welfare.

Regarding whether Victoria’s pig welfare laws and standards meet international standards, the Committee heard conflicting views.

The Australian Food Sovereignty Alliance, for example, submitted that while the Pig Welfare Standards ‘set out the minimum standards and guidelines for pig welfare in Victoria ... they are indeed a minimum standard rather than any semblance of best practice care for living creatures’.¹⁹²

¹⁹⁰ Edison Alvares, Chief Operating Officer, Pork Division, JBS Australia/Rivalea, public hearing, 13 March 2024, *Transcript of evidence*, p. 43.

¹⁹¹ *Ibid.*

¹⁹² Australian Food Sovereignty Alliance, *Submission 573*, p. 7.

Shreya Basu, a submitter from Singapore, expressed their surprise that the Pig Welfare Standards ‘do not align with international best practices, stating that ‘Victoria appears to be trailing behind other jurisdictions in pig welfare reform, a concern heightened by the growing public awareness and conscientious purchasing behaviours.¹⁹³

Noting Australia’s status as a ‘developed nation’, Robert McGeary argued that:

To be worthy of this status we must have best practice care for all sentinel beings. Particularly the highly sensitive and intelligent pigs. It is not possible to be a developed state/nation while allowing barbaric inhuman practices.¹⁹⁴

In a similar vein, Penelope Furphy wrote:

It is time Australia was in line with other developed countries, adopts “best practice”, and that care and compassion prevails over productivity and profit.¹⁹⁵

In its submission, Edgar’s Mission, an animal sanctuary, referred to Australia’s low ranking in the World Animal Protection Society’s Animal Protection Index:

According to the World Animal Protection Society, Australia scores a lowly “E” on their Animal Protection Index for “Protecting animals used for farming.” This index “is a ranking of 50 countries around the globe according to their legislation and policy commitments to protecting animals.”¹⁹⁶

Dr Annemarie Jonson contended that ‘[i]ndustry practices are self-regulated, as there is no state or federal legislation that specifically defines “best practices” for the pork industry’.¹⁹⁷

Likewise, Nischal Bhatt recommended that the Victorian Government model its regulatory framework on the United Kingdom, which sets out certain housing requirements in legislation.¹⁹⁸

Given ‘[t]he lack of specific legislative mention of industry best practices’, Ellie Herodes called for legislation to ‘[e]xplicitly state the adoption of industry best practices endorsed by independent experts, prioritising the welfare of pigs over industry convenience’.¹⁹⁹

Other submitters put forward a similar view that ‘there is no “best practice” to farming and killing animals for food’.²⁰⁰ Speaking to the Committee, Animals Australia’s Chief

¹⁹³ Shreya Basu, *Submission 123*, p. 2.

¹⁹⁴ Robert McGeary, *Submission 112*, p. 2.

¹⁹⁵ Penelope Furphy, *Submission 148*, p. 2.

¹⁹⁶ Edgar’s Mission, *Submission 519*, p. 4.

¹⁹⁷ Dr Annemarie Johnson, *Submission 320*, p. 2.

¹⁹⁸ Nischal Bhatt, *Submission 2002*, p. 2.

¹⁹⁹ Ellie Herodes, *Submission 776*, p. 3.

²⁰⁰ Michael Mackie, *Submission 726*, p. 2. See also submission 2040.

Executive Officer Glenys Oogjes expressed that 'best practice in the pig industry is very hard to find, in that stress and confinement are pretty much universal'.²⁰¹

On the other hand, the Committee heard from stakeholders who praised Victoria's laws and standards as meeting and promoting best practice.

PIC Australia, for example, contended that:

the scope, application, compliance with and enforcement of regulatory frameworks for pig producers, which is supported by the industry's quality assurance program APIQ, is satisfactory not only as regards compliance but also the collective ability of both APIQ and the frameworks to promote best practice pig welfare outcomes.²⁰²

Bernard Gleeson pointed out that '[t]he Australian pig industry is well regarded and well placed globally in terms of animal welfare and contributes high quality welfare research to the international scientific community'.²⁰³

Australian Pork Limited also argued '[t]he Australian pig industry is recognised as a global leader in pig welfare'.²⁰⁴ However, in doing so, it cautioned that:

there is no one global 'best practice standard'. We must do our own due diligence and invest in Australian research to help ensure any recommendations for best practice in the Australian pig industry are backed by robust science and are fit for purpose in our unique operating environment.²⁰⁵

Australian Pork Limited also highlighted what it believed to be 'a misconception' that 'some countries have implemented regulatory regimes ... of "better practice than Australia"', arguing that:

closer scrutiny of these regulations and their associated caveats do not necessarily demonstrate better animal welfare outcomes than those achieved (and verified through independent audits) on Australian farms.²⁰⁶

Dr Rebecca Athorn, Manager of Production Innovation at Australian Pork Limited elaborated in a public hearing that:

The term 'global best practice' is a fairly loose term, and there is no such thing as global best practice. What there is is that we do research continuously, we look at what is happening globally, some of the trends that are happening, and we take that into our own unique set of circumstances and our operating environment here in Australia. We would take that advice, we would do our own research and our own due diligence around some of these practices. A lot of the things that are touted as best practice or standards are not necessarily legislated in other countries either. It is just that they

²⁰¹ Glenys Oogjes, *Transcript of evidence*, p. 51.

²⁰² PIC Australia, *Submission 139*, p. 1.

²⁰³ Bernard Gleeson, *Submission 2018*, p. 2.

²⁰⁴ Australian Pork Limited, *Submission 543*, p. 10.

²⁰⁵ *Ibid.*

²⁰⁶ *Ibid.*, p. 10.

are saying, 'This is what we do.' But they do operate in a very different environment; the climate is different, the facilities are different and those kinds of things. So we need to have a broad overview of it and have a lot of different information coming in – information from experts and a dialogue with our producers around these different practices.²⁰⁷

Australian Pork Limited recommended the Committee recognise 'the risks in comparing international farming and regulatory practices with appropriate best practice under Australian conditions'.²⁰⁸

Other stakeholders made a similar argument about the risks of international comparisons. PIC Australia, for instance, posited that:

International comparisons are not useful and should not be considered a guide to best practice; standards set in other countries are set according to that country's or area's particular context and will not take into consideration Australian specific characteristics that impact industry such as climate type, labour availability, infrastructure, feed ingredients etc. Numerous cases of infrastructure and associated protocols implemented from so-called European best practice have failed to work in Australia as they failed to consider the Australian context.²⁰⁹

Several submissions also contained the following paragraph, stating that because 'the Australian agricultural environment is varied and unique':

The differences between overseas and Australian agricultural production systems need to be properly considered, a task often involving pig veterinarians. For example, Australia has a range of climatic zones where pig production occurs from temperate to arid. Many international comparisons are difficult as their housing, welfare and environmental systems are structured for differing industries. Apian pig veterinarians have and will continue to learn from our international colleagues and where appropriate, investigate and adopt international research, however international industry practices and regulations are not always assumed to represent best practice standards for Australia.²¹⁰

The Committee acknowledges that, due to Australia's unique environment, it is difficult to determine best practice by reference to international standards. Despite this, it emphasises the need for continuous improvement in the farming and slaughter of pigs and other animals for human consumption. Reference to 'best practice'—including 'global best practice'—can help inform the improvement of animal welfare in an Australian context. The Committee therefore adopts this reference throughout this report.

²⁰⁷ Dr Rebecca Athorn, Manager, Production Innovation, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, pp. 8–9.

²⁰⁸ *Ibid.*

²⁰⁹ PIC Australia, *Submission 139*, p. 2.

²¹⁰ See, for example, submissions 284, 365 and 393.

3.6 A national framework for animal welfare

In 2005, the Australian Government released the Australian Animal Welfare Strategy. The purpose of the Strategy was to provide:

direction for the development of future animal welfare policies, based on a national consultative approach and a firm commitment to high standards of animal welfare. It will facilitate the establishment of priorities that are consistent with agreed strategic goals and the revision of, and agreement on, acceptable standards. The Strategy clarifies the roles and responsibilities of key community, industry and government organisations.²¹¹

In 2014, the Strategy lapsed.²¹² However, the Government has since committed \$5 million for the development of a renewed Strategy ‘to facilitate joint leadership from the Australian Government and state and territory governments to animal welfare’.²¹³ The new Strategy will seek to establish a national framework to bringing together key stakeholders on animal welfare issues, provide a forward direction for animal welfare, and maintain Australia’s commitment to animal welfare practices.²¹⁴ It is expected to be released in 2027, and will cover all animals, including livestock and production animals.²¹⁵

3.6.1 The Australian Animal Welfare Standards and Guidelines

One of the goals of the Australian Animal Welfare Strategy was to ‘[a]chieve an enhanced national approach and commitment to ensure high standards of animal welfare based on a concise outline of current practices’. This involved, among other things:

- ‘[facilitating] the timely development, and revision of codes of practice, standards and guidelines and legislation for the welfare of animals’
- ‘[promoting] the adoption of a harmonised approach to the development and application of ... animal welfare legislation and codes of practice across all state, territory and local government jurisdictions’.²¹⁶

As noted in the Land Transport Standard, the creation of the Australian Animal Welfare Standards and Guidelines was an ‘important component’ of the Strategy.²¹⁷ Although the Strategy has lapsed, this function of reviewing, updating and harmonising animal

²¹¹ Department of Agriculture, Fisheries and Forestry, *The Australian Animal Welfare Strategy*, Department of Agriculture, Fisheries and Forestry, Canberra, 2005, p. 7.

²¹² Department of Agriculture, Fisheries and Forestry, *Renewing the Australian Animal Welfare Strategy: discussion paper*, Department of Agriculture, Fisheries and Forestry, 2024, p. 4.

²¹³ Ibid.

²¹⁴ Ibid.

²¹⁵ Ibid.

²¹⁶ Department of Agriculture, Fisheries and Forestry, *The Australian Animal Welfare Strategy*, p. 11.

²¹⁷ Standing Council on Primary Industries, *Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock*, p. vii.

welfare standards and guidelines has since been taken up the Animal Welfare Task Group, a sub-group of the Agricultural Senior Officials' Committee.

At the national level, the Agricultural Senior Officials' Committee comprises department heads and chief executive officers of all Australian and New Zealand government agencies responsible for primary industries.²¹⁸ It has a number of task groups that report to it, including the Animal Welfare Task Group, which:

- promotes national consistency of farm animal welfare regulations
- oversees the development and review of standards and guidelines for farm animals.²¹⁹

As part of its work, the Task Group is responsible for coordinating a review of the Model Codes of Practice for the Welfare of Animals and their conversion to Australian Animal Welfare Standards and Guidelines.²²⁰ The Department of Agriculture, Fisheries and Forestry's website explains that:

The development of national animal welfare standards and guidelines through the collaborative mechanism of the AWTG is intended to provide clarity and consistency and facilitate the understanding of animal welfare requirements across industry, the community and trading partners.²²¹

Regarding Victoria's participation, the Department of Energy, Environment and Climate Action and PrimeSafe explained that '[t]he Victorian Government is a member of the national Animal Welfare Task Group', and that it 'actively participates' in the development of the new Standards and Guidelines.²²² They further elaborated that 'all endorsed [Standards and Guidelines] will be adopted into regulations under the proposed new Animal Care and Protection Act'.²²³ Opportunities for this new Act are examined in Section 3.7 below.

As noted in Section 3.2.6, there are two livestock management standards relevant to the welfare of farmed pigs in Victoria: the Land Transport and Pig Welfare Standards. In 2012, the Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock replaced the various Model Codes relating to the transport of livestock.²²⁴ Over a decade later, however, the Task Group has yet to replace the *Model Code of Practice for the Welfare of Animals—Pigs*, and according to the Department's website

²¹⁸ Australian Government, *Agriculture Senior Officials Committee*, <<https://www.directory.gov.au/portfolios/agriculture-water-and-environment/department-agriculture-water-and-environment/agriculture-senior-officials-committee>> accessed 15 April 2014.

²¹⁹ Department of Agriculture, Fisheries and Forestry, *The Animal Welfare Task Group – AWTG*, <<https://www.agriculture.gov.au/agriculture-land/animal/welfare/awtg>> accessed 15 April 2024.

²²⁰ Ibid.

²²¹ Department of Agriculture, Fisheries and Forestry, *Australian Animal Welfare Standards and Guidelines*, <<https://www.agriculture.gov.au/agriculture-land/animal/welfare/standards-guidelines>> accessed 15 April 2024.

²²² Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 12.

²²³ Ibid.

²²⁴ Standing Council on Primary Industries, *Australian Animal Welfare Standards and Guidelines—Land Transport of Livestock*, pp. vii–viii.

no work is as yet underway to do so.²²⁵ Hence, the current *Victorian Standards and Guidelines for the Welfare of Pigs* are based on the Model Code.

The Committee heard from animal welfare groups who criticised the failure to update the Animal Welfare Standard and Guidelines for Pigs. For example, Animals Australia contended that ‘Australia lacks an up-to-date nationally consistent approach to pig welfare’, suggesting that as a result ‘[t]he key policy documents are woefully out of date, contributing to inadequate animal welfare regulations’.²²⁶

[T]he opportunity to improve existing standards via the national Animal Welfare Standards and Guidelines process has undergone delays since 2012 with the last activity recorded in 2017. In February 2020 the Agriculture Ministers’ Forum (AGMIN) announced that the process will recommence and be led by the Queensland Government, however, at the time of writing (January 2021) no significant progress has yet been made in advancing this review.²²⁷

Dr Peter Slattery called on the Victorian Government to lead the establishment of a national Animal Welfare Commission to take charge of the development of national animal welfare standards:

The Productivity Commission (2016) also recommended a national Commission for Animal Welfare, which would take charge of developing national welfare standards, as well as monitoring and reporting on compliance by the states and territories, and commissioning research. Similar sentiments have been expressed by the Australian Labor Party and the Australian Greens (Goodfellow, 2016). The Victorian Legislative Council, and the Victorian Government in response, also expressed support for a national independent animal welfare body in 2020. The Victorian Government should take a leadership role in continuing to support the establishment of a national Animal Welfare Commission.²²⁸

The Committee emphasises the need for a national framework for animal welfare, including in relation to the development of national standards and guidelines. It acknowledges the work of the Australian Government in updating these standards and guidelines and looks forward to the renewed Animal Welfare Strategy in 2027. However, given the current Pig Welfare Standard is based on a Model Code last updated in 2008, the Committee is concerned about the pace of these reforms. Given the various issues highlighted in this Report, the Committee calls on the Victorian Government to take a lead in updating and replacing the Model Code relating to the welfare of pigs.

225 Department of Agriculture, Fisheries and Forestry, *The Animal Welfare Task Group – AWTG*, <<https://www.agriculture.gov.au/agriculture-land/animal/welfare/awtg>> accessed 15 April 2024.

226 Animals Australia, *Submission 232*, p. 8.

227 Ibid.

228 Dr Peter Slattery, *Submission 273*, p. 3.

FINDING 6: Due to a delay in updating and replacing the national Model Codes of Practice for the Welfare of Animals, the *Victorian Standards and Guidelines for the Welfare of Pigs* is outdated.

RECOMMENDATION 4: That the Victorian Government participate and contribute to updating and replacing the 2008 *Model Code of Practice for the Welfare of Animals—Pigs* through the Australian Animal Welfare Standards and Guidelines process.

3.7 The new Animal Care and Protection Act

Since 2020, the Victorian Government has been seeking public feedback on a new Animal Care and Protection Act, to replace the current Prevention of Cruelty to Animals Act.²²⁹

Dougal Purcell, Acting Chief Executive of Agriculture Victoria, explained that the new Act would balance the need to protect animals with the need to support Victoria's animal agriculture sector:

I would like to briefly refer to our commitment – the Victorian government's commitment – to replace the *Prevention of Cruelty to Animals Act* with a new Animal Care and Protection Bill. Reforming the legislation of POCTA delivers on several recommendations made by the parliamentary Inquiry into the Impact of Animal Activism on Victorian Agriculture, which I have mentioned. The reform in the Animal Care and Protection Bill will protect animals in Victoria while supporting our animal-based sectors to function responsibly and productively. The reform has included extensive consultation and engagement with industry and animal welfare organisations, and we have recently – yesterday – just closed the consultation period for the legislation. There will be further consultation as the regulations are further developed in the approaching years.²³⁰

According to the Exposure Draft of the Bill, the purpose of the Act would be to provide for animal care and protection by setting out:

- care requirements for animals and offences for failing to meet those requirements
- offences and other requirements carrying out certain types of activities relating to animals
- the control and regulation of certain uses of animals and practices involving animals.²³¹

²²⁹ Engage Victoria, *Reforming Victoria's animal care and protection laws*, <<https://engage.vic.gov.au/new-animal-welfare-act-victoria>> accessed 16 April 2024.

²³⁰ Dougal Purcell, Acting Chief Executive, Agriculture Victoria, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 3.

²³¹ *Animal Care and Protection Bill Exposure Draft (Vic)* s1.

The Act would broaden the definition of cruelty to include:

- doing or omitting to do an act that causes or is likely to cause unreasonable harm, pain or distress on an animal
- for a person who owns, is in charge of, or has authority to direct care for an animal, unreasonably failing to ensure or appropriate treatment, food or drink.²³²

Unlike the Prevention of Cruelty to Animals Act, it would also:

- recognise animal sentience²³³
- introduce minimum standards of care, the failure to meet or provide which would constitute an offence.²³⁴

Notably, the proposed Act would not contain a section excluding the Act's application to certain practices, such as the slaughter of animals in accordance with the Meat Industry Act or actions done in accordance with a POCTA Code of Practice. However, it would list a number of other exceptions. For example, under the Act, it would not be an offence for a person to kill, wound or capture an animal if:

- the person did so for a specified reason, e.g., to produce goods or food from the animal²³⁵
- regulations applied to the killing, wounding or capturing of the animal, and the person did not contravene these regulations.²³⁶

Acknowledging that the Victorian Government intends to create regulations that cover livestock and production animals,²³⁷ the Committee heard concerns from animal welfare groups that the exceptions under the new Act and Regulations would simply echo POCTA's current exemptions, for example in relation to the slaughter of animals under the Meat Industry Act.

In its submission, the Animal Defenders Office contended that:

the effectiveness of the draft Bill in promoting pig welfare outcomes would be heavily dependent on the making of regulations which is scheduled to happen after the passing of the Bill.

Thus while the draft Bill may not follow the POCTA Act in explicitly excluding from its scope activities related to farmed pigs, the same result may be achieved in practice depending on the content of the regulations.²³⁸

²³² *Animal Care and Protection Bill Exposure Draft (Vic)* s 21.

²³³ *Animal Care and Protection Bill Exposure Draft (Vic)* s 6.

²³⁴ *Animal Care and Protection Bill Exposure Draft (Vic)* pt 3 div 1.

²³⁵ See definition of specified reason in *Animal Care and Protection Bill Exposure Draft (Vic)* s 58.

²³⁶ *Animal Care and Protection Bill Exposure Draft (Vic)* s 31(1).

²³⁷ Department of Jobs, Precincts and Regions, *Victoria's New Animal Care and Protection Laws—Plan*, Victorian Government, 2022, p. 18.

²³⁸ Animal Defenders Office, *Submission 265*, p. 6.

Likewise, Glenys Oogjes, Chief Executive Officer of Animals Australia, stated:

I was just going to say that a real concern at the present time – and it is an issue for today if you like and the next couple of years – is that at the moment there is a Bill that is out for consultation for the review of the *Prevention of Cruelty to Animals Act*, and of course it is now called the Animal Care and Protection Bill, as I am sure you know. The issue is that for the sorts of exemptions we have for codes at the present time under the Act – and that is for the meat Act, the land management Act and the codes of practice – it is contemplated that that is going to happen again. They are just going to be called exceptions – okay, exemptions, exceptions, whatever you like. There are some really good people trying to put this together, but there is so much pushback that it does not look like the key elements – the skeleton, if you like, the structure of the new Act – are going to be any different. We have an opportunity here to do something about that.²³⁹

In a public hearing, Trevor Pisciotta from Agriculture Victoria explained that:

The Animal Care and Protection Bill does not propose to have a specific exemption for the *Meat Industry Act*, which is currently provided for under POCTA. That is because it is anticipated that the regulations under the Animal Care and Protection Act and future PrimeSafe licences will both reference that national standard for livestock processing. So essentially the two schemes, the food safety scheme administered by PrimeSafe under the *Meat Industry Act* and the animal care and protection legislative scheme administered by Agriculture Victoria in respect to livestock, will be applying the same national standard.²⁴⁰

The Victorian Government has acknowledged that while '[t]he new laws would not specifically mention on-farm slaughter, nor reference to the Meat Industry Act 1993 or any Commonwealth Act', this would 'not change the requirements in practice, as those Acts do not allow 'unreasonable' harm, pain or distress'.²⁴¹ It also noted that '[c]urrent legal and legitimate activities including hunting, fishing ... , farming, racing slaughter and pest control would be able to continue under the new laws'. Notwithstanding this, it explained:

The new laws would provide greater clarity that exceptions would only apply to activities allowed under other specified legislation, and not entire industries or animal uses, and that cruelty to animals covered by other legislation can be prosecuted under the new laws.

...

Any activity involving killing or wounding an animal (including slaughter) could be controlled as this is within the Framework for specified classes of conduct. This would allow regulations to prescribe how an activity may be done, including the adoption of Australian Animal Welfare Standards and Guidelines for the processing of livestock.²⁴²

²³⁹ Glenys Oogjes, *Transcript of evidence*, p. 50.

²⁴⁰ Trevor Pisciotta, Executive Director, Animal Welfare Victoria and Agricultural Regulatory Policy, Agriculture Victoria, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 11.

²⁴¹ Department of Jobs, Precincts and Regions, *Victoria's New Animal Care and Protection Laws—Plan*, p. 30.

²⁴² *Ibid.*, p. 30.

3.7.1 Opportunities for the new Act

The Committee received a considerable number of submissions praising the acknowledgement of animal sentience in the proposed legislation and calling for the Pig Welfare Standards to do the same.²⁴³ It also received evidence for how the Act could be improved upon.

Reinstating decision-making principles

A number of submissions endorsed the Australian Alliance for Animals' recommendation that the new Act establish legislative decision-making principles for the making and adoption of animal welfare codes and standards.²⁴⁴ In particular, the Alliance recommended that:

the Victorian Government establish legislative criteria in the proposed Animal Care and Protection Act for the making and adoption of industry-based animal welfare codes and standards to ensure there is consistency with the principles and duties of the Act.²⁴⁵

In its published 'Plan' for the new laws, the Victorian Government flagged that decisions made under the new Act and other relevant legislation would need to consider the following four principles:

- care requirements should be met for animals in the care or control of people
- unreasonable harm, pain or distress for animals should be avoided
- where harm, pain or distress cannot be avoided, it should be minimised
- alternatives that reduce harm, pain or distress should be considered.²⁴⁶

According to the Plan, these principles would apply to decisions for the granting of licenses and the development of regulations, among other things.²⁴⁷

However, as it stands, the Exposure Draft of the Animal Care and Protection Bill does not contain a requirement that decision-makers consider these principles. In its guide to the draft Bill, the Government explained that:

The 'decision-making principles' and 'obligation for public authorities to consider animal care and protection' proposed in the Plan for Victoria's animal care and protection laws have been revised following further consideration of the technical and practical challenges of that original approach.

²⁴³ See, for example, submissions 804, 822 and 853.

²⁴⁴ See, for example, submissions 1526, 2005, and 2137.

²⁴⁵ Australian Alliance for Animals, *Submission 469*, p. 6.

²⁴⁶ Department of Jobs, Precincts and Regions, *Victoria's New Animal Care and Protection Laws—Plan*, p. 23–24.

²⁴⁷ *Ibid.*

The draft Bill instead provides a power for the Minister to issue Ministerial Guidelines to public authorities for them to consider animal care and protection.²⁴⁸

The Committee understands that there may be technical and practical challenges to including the decision-making principles outlined above in the proposed Animal Care and Protection Act. Given the potential to substantially improve animal welfare in Victoria—including the welfare of farmed pigs—the Committee urges the Government to consider including them in the final Animal Care and Protection Bill in relation to the development and adoption of animal welfare standards and guidelines in Victoria.

FINDING 7: The decision-making principles proposed in the Victorian Government’s initial plan for Victoria’s new animal care and protection laws would have improved decision-making outcomes for animal welfare.

RECOMMENDATION 5: That the Victorian Government include decision-making principles in the new Animal Care and Protection Bill in relation to the development and adoption of animal welfare standards and guidelines in Victoria.

Empowering an Independent Office of Animal Protection

As with the current Prevention of Cruelty to Animals Act, the new Animal Care and Protection Act would not create an independent authority for animal welfare.

In terms of enforcing the Act, the proposed legislation would enable the Secretary of the Department of Energy, Environment and Climate Action to appoint authorised officers to undertake enforcement and compliance activities under the Act.²⁴⁹ Similar to POCTA Inspectors, authorised officers would comprise public servants, officers from RPSCA Victoria, and certain others.²⁵⁰ Like POCTA Inspectors, they would also have various enforcement powers, including the power to enter, search and issue notices to comply.²⁵¹

With regard to animal welfare policy, the Act would also establish an Expert Advisory Committee to provide advice to the Minister for Agriculture on:

- the care and protection of animals
- current best practice and scientific knowledge relating to animals
- public policy and regulatory best practice relating to animal care and protection
- review of laws relating to animals.²⁵²

²⁴⁸ Department of Energy, Environment and Climate Action, *Guide to draft Animal Care and Protection Bill*, Victorian Government, 2023, p. 18.

²⁴⁹ *Animal Care and Protection Bill Exposure Draft* (Vic) s 180.

²⁵⁰ *Animal Care and Protection Bill Exposure Draft* (Vic) pt 11.

²⁵¹ *Animal Care and Protection Bill Exposure Draft* (Vic) pt 11.

²⁵² *Animal Care and Protection Bill Exposure Draft* (Vic) ss 308 and 309.

An equivalent to the Expert Advisory Committee does not exist under the current Prevention of Cruelty to Animals Act. Rather, the Minister receives expert and strategic advice on issues related to animal welfare from a non-statutory Animal Welfare Advisory Committee.²⁵³ In 2018, through its Animal Welfare Action Plan, the Victorian Government also established Animal Welfare Victoria,²⁵⁴ ‘a dedicated public sector group ... to bring together all aspects of domestic animal and animal welfare research, policy, education and compliance’.²⁵⁵ At present, the branch exists under the Agriculture Victoria within the Department Energy, Environment and Climate Action,²⁵⁶ but there is limited evidence available about what impact it has had on the development of animal welfare policies in Victoria.

Given the perception that Agriculture Victoria holds conflicting interests in its duties to enhance productivity and improve animal welfare, the Committee heard numerous calls for the establishment of an independent body to help dictate policy and ensure compliance with animal welfare requirements.

In its submission, the Australian Alliance for Animals stressed that ‘independent and accountable governance is needed to ensure there is greater alignment between the state’s animal welfare laws and standards and the Victorian community’s values and expectations’.²⁵⁷ It also noted the Victorian Government previously supported the creation of an Australian Commission for Animal Welfare.²⁵⁸ The Australian Alliance for Animals recommended that:

the Victorian Government establish an independent Victorian Office of Animal Welfare under the proposed Animal Care and Protection Act with responsibility for overseeing the development of animal welfare policy and standards.²⁵⁹

In support of this recommendation, the Alliance highlighted that reform would attract community support:

Research undertaken by BehaviourWorks Australia between February-March 2023 found that over 80% of Australians believe the final say on animal welfare policy decisions should be made by an independent and impartial authority, with 68% believing this should be an independent animal welfare agency, and only 22% supporting the current practice of allocating responsibility to departments of agriculture.²⁶⁰

²⁵³ Animal Welfare Victoria, *Animal welfare advisory committee*, <<https://agriculture.vic.gov.au/livestock-and-animals/animal-welfare-victoria/animal-welfare/animal-welfare-advisory-committee>> accessed 22 April 2024.

²⁵⁴ Department of Jobs, Precincts and Regions, *Victoria’s New Animal Care and Protection Laws—Plan*, p. 62.

²⁵⁵ Department of Economic Development, Jobs, Transport and Resources, *Animal Welfare Action Plan*, Victorian Government, 2017, p. 15.

²⁵⁶ See Department of Energy, Environment and Climate Action, *Functional Organisational Chart from 1 March 2024* (n.d.), <https://www.deeca.vic.gov.au/_data/assets/pdf_file/0029/614657/DEECA-Org-Chart.pdf> accessed 16 April 2024.

²⁵⁷ Australian Alliance for Animals, *Submission 469*, p. 4.

²⁵⁸ *Ibid.*

²⁵⁹ *Ibid.*, p. 5.

²⁶⁰ *Ibid.*, p. 4.

In a public hearing, Dr Jed Goodfellow, Co-Founder of the Alliance, elaborated that:

If we want to see standards and laws that are fit for 21st-century Australian values, and ultimately if we want to see less animal abuse and less routine animal suffering, these governance arrangements need to change, and Victoria has a prime opportunity to lead the way in this regard. Establishing an independent Victorian office of animal welfare to oversee the development of policy and standards and to provide a source of expert advice to government would go long way to creating a more robust, inclusive and evidence-based animal welfare system for Victoria.²⁶¹

Support for the Alliance's recommendation was echoed in several submissions to the Inquiry, which contained the following paragraph:

Establishing an independent Victorian Office of Animal Welfare and assigning it a distinct ministerial portfolio, separate from agriculture portfolios, would ensure that animal welfare standards properly align with the public's values and expectations. A 2023 study reported that 80% of Australians believe an independent, impartial authority should have the final say on animal welfare regulations, one that is separate from departments of agriculture (BehaviourWorks Australia, 2023). The Office should act as the principal entity responsible for the development of animal welfare policy and standards that are more science-based, transparent, and consistent with public expectations. The Office should be established under the proposed *Animal Care and Protection Act*, have relevant expertise, and be adequately funded (Australian Alliance for Animals, 2022).²⁶²

Oliver Culshaw recommended the establishment of 'an independent body to oversee and regulate animal farming practices, ensuring unbiased evaluation by skilled veterinarians'.²⁶³ Their submission argued that this would 'challenge the industry's self-certification practices and propose the adoption of transparent and independent certification systems to build consumer trust'.

Lisa Musgrove called for regulatory frameworks to 'be regularly monitored for compliance in every farm and slaughterhouse, **by independent bodies** which include veterinarians and animal welfare experts who are completely separated from the animal farming industry'.²⁶⁴

Whether or not the Victorian pig industry can be considered 'self-regulated', the Committee accepts that an independent, appropriately funded statutory authority has the potential to significantly improve outcomes for farmed pigs in Victoria. An Independent Office of Animal Protection—which could be authorised under the new Animal Care and Protection Act or similar legislation—should be responsible for all aspects of animal welfare in Victoria, including the creation and enforcement of standards, monitoring compliance with these standards, and dictating animal welfare reform.

²⁶¹ Dr Jed Goodfellow, *Transcript of Evidence*, 12 March 2024, p. 2.

²⁶² See, for example, submissions 1536, 1549 and 1563.

²⁶³ Oliver Culshaw, *Submission 820*, p. 9.

²⁶⁴ Lisa Musgrove, *Submission 848*, p. 2.

FINDING 8: An independent, appropriately funded statutory authority has the potential to significantly improve outcomes for farmed pigs in Victoria.

RECOMMENDATION 6: That the Victorian Government consider the establishment of an Independent Office of Animal Protection to ensure compliance with animal protection laws, streamline complaints, provide expert, evidence-based reform, and monitor animal welfare conditions within Victoria

Chapter 4

Stunning methods before slaughter

4.1 Purposes of stunning

Australian standards stipulate that pigs must be stunned prior to being slaughtered for the production of meat. The purpose of stunning is to ensure an animal is unconscious and unable to experience pain, suffering or distress before and during slaughter.¹

Stunning aims to intentionally cause unconsciousness and insensibility without pain and suffering. According to Australian Pork Limited, animals must remain unconscious until death occurs through loss of blood, if not killed by the stunning method itself.²

While rendering animals unconscious, stunning may or may not kill an animal outright, depending on the method used. Some methods (gassing) may only induce unconsciousness for a period time before the animal recovers.³

Approved methods of stunning

The Model Code of Practice for the Welfare of Animals – Livestock at Slaughtering Establishments (see Chapter 3) deems it acceptable for pigs to be stunned using three methods:⁴

- gas (controlled atmosphere)
- mechanical (e.g., captive bolt)
- electrical methods.

CO2 stunning is by far the most used technique for stunning pigs. Analysis of this method therefore occupies the bulk of this chapter. A total of 1,202,060 pigs were slaughtered in Victoria in abattoirs in the 2022–23 licence year. Approximately 93% of these pigs were subject to gas stunning.⁵

1 Australia and New Zealand Food Regulation Ministerial Council, *Australian standard for the hygienic production and transportation of meat and meat products for human consumption* (AS 4696:2007), 2007, <<https://www.primesafe.vic.gov.au/resources/australian-standard-for-the-hygienic-production-and-transportation-of-meat-and-meat-products-for-human-consumption>> accessed 9 April 2024, p. 21; RSPCA Victoria, *Submission 1358*, p. 9.

2 Australian Pork Limited, *Submission 541*, p. 29.

3 Ibid.

4 Standing Committee on Agriculture and Resource Management, *Model Code of Practice for the Welfare of Animals – Livestock at Slaughtering Establishments*, CSIRO Publishing, 2001, p. 10.

5 Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 19.

All export accredited pig abattoirs currently use carbon dioxide stunning systems, which account for approximately 85% of the pigs slaughtered in Australia.⁶

Victoria has six abattoirs that slaughter and process pigs. Three use electrical stunning methods, two use CO2 stunning, and one adopts the mechanical (captive bolt) approach. Use of gas stunning is in line with national standards and is permitted under PrimeSafe licensing conditions.⁷

Stunning and bleeding

The process of stunning the pig is followed by a bleeding process known as sticking which is to ensure death prior to the slaughter process and to ensure blood loss to maximise meat quality. Meat must be free from residual blood so it is suitable for human consumption.⁸ After unconsciousness has been confirmed following stunning, pigs are bled out by having the major blood vessels in their neck severed using a knife.⁹

According to Australian Pork Limited's submission, 'While animal welfare is of utmost importance, the safety of the human operators and economics and environmental impacts also need to be considered'.¹⁰

Pig producers consistently framed welfare issues related to stunning – primarily the stress of human handling – as also having important commercial imperatives.¹¹

Stress immediately before slaughter impacts post-mortem muscle metabolism, increasing the incidence of pale, soft exudative meat and blood splash within the meat.¹²

It should be recognised the industry has invested resources developing techniques to improve handling of pigs by stockpeople. Specifically, in the 1990s ProHand was developed by the Animal Welfare Science Centre at The University of Melbourne with funding from Australian Pork Limited and Australian Meat Processor Corporation.¹³ According to the Australian Meat Industry Council, ProHand is a training program designed 'to educate stock-people on how to handle pigs in a way that reduces fear and stress of the animals'.¹⁴

6 RSPCA Victoria, *Submission 1358*, p. 9; Australian Veterinary Association, *Submission 860*, p. 10.

7 Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 19.

8 Australian Pork Limited, *Submission 541*, p. 29.

9 RSPCA Victoria, *Submission 1358*, p. 10.

10 Australian Pork Limited, *Submission 541*, p. 29.

11 Ibid.

12 Australian Meat Industry Council, *Submission 584*, p. 10.

13 Australian Pork Limited, *Submission 541*, p. 30. For further information, see: Professor Paul Hemsworth, Animal Welfare Science Centre, University of Melbourne, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 52; Dr Tony Peacock, Chair, Australian Pork Research Institute Ltd, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 39.

14 Australian Meat Industry Council, *Submission 584*, p. 8.

4.1.1 Welfare principles

The Inquiry terms of reference required the Committee to investigate welfare issues arising with stunning pigs for slaughter.

Veterinarians, experts and animal welfare groups consistently told the Committee that there are ‘animal welfare challenges associated with all types of commercial stunning methods used in Australia’.¹⁵

According to RSPCA Victoria, there are several key species-related and farming practice factors that impact pig welfare at stunning and slaughter:

- Pigs are highly susceptible to stress. Pigs are exposed to a number of stressors prior to slaughter including transport, mixing with unfamiliar pigs, handling, and they may also experience some degree of thermal stress. Pigs in the lairage area of abattoirs (where animals are confined before slaughter) will in most cases already have increased stress levels prior to stunning and slaughter.
- Pigs naturally prefer to remain in small groups and be able to walk side by side when being handled and moved.
- Electric prodders are still allowed and commonly used to move pigs through the lairage and stunning areas at abattoirs.¹⁶

All stakeholders readily recognised that human handling significantly impacts pig stress at slaughter.¹⁷ Stunning methods that reduce human interaction were advocated as enhancing pig welfare during the slaughter process. More complexly, stakeholders also stated the behaviour and practices of stockpeople impact the behaviour and stress of pigs.¹⁸

Australian Pork Limited told the Committee that in addition to training stockpersons to understand the animal’s behavioural characteristics and capabilities, optimising lairage and slaughter conditions (particularly facility layout, ambient control and handling) can help pigs recover from the stress of handling and transport and minimise stress during the slaughter process.¹⁹

4.2 Controlled atmosphere stunning (CAS)

Controlled atmosphere stunning (CAS) is a stunning method involving changing the ambient atmospheric gas concentration to induce unconsciousness.²⁰ Both in Australia

¹⁵ See Australian Veterinary Association, *Submission 860*, p. 5; Apiam Animal Health, *Submission 365*, p. 3.

¹⁶ RSPCA Victoria, *Submission 1358*, p. 9.

¹⁷ Australian Meat Industry Council, *Submission 584*, p. 8.

¹⁸ Professor Paul Hemsworth, Animal Welfare Science Centre, University of Melbourne, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, pp. 50–52.

¹⁹ Australian Pork Limited, *Submission 541*, p. 29.

²⁰ Australian Meat Industry Council, *Submission 584*, p. 8.

and overseas, carbon dioxide (CO₂) stunning is overwhelmingly favoured as the technique for stunning pigs before slaughter in high volume commercial settings.

A variety of other gases and CAS techniques continue to be trialled worldwide as a replacement for CO₂, which despite its preference among producers and veterinarians, does involve significant aversive impacts for pigs.

4.2.1 Carbon dioxide stunning

Carbon dioxide stunning utilises high concentrations of CO₂ gas (from 80% to 90%) to render pigs unconscious before slaughter.²¹

In carbon dioxide gas stunning systems, pigs are moved into a stunning chamber (known as a gondola) and lowered directly or in stages into a high concentration of carbon dioxide gas. Pigs are not rendered unconscious immediately. As they inhale the gas, their blood-carbon dioxide levels gradually increase and blood-oxygen levels decrease, eventually causing unconsciousness due to loss of brain function. Pigs are exposed to the carbon dioxide gas for several minutes until unconsciousness has been achieved and then are removed from the gondola.²² RSPCA Victoria report that decreased brain activity following exposure to high concentrations of carbon dioxide range from around 30–75 seconds, however the response time can differ depending on pig genetics, age, reactivity, and stress levels prior to stunning.²³

Advantages of CO₂ stunning

CO₂ stunning is considered by the industry to have both welfare and commercial advantages over other pre-slaughter stunning methods. CO₂ systems were first introduced in the 1990s as an alternative to electric stunning (see Section 4.3), as a less stressful technique for both staff and pigs and to provide a higher quality meat.²⁴

From an animal welfare perspective, the main advantage of the CO₂ stunning method using the back-load system (see Section 4.5 for details) is it allows for small groups of pigs to be moved together as a unit during preslaughter handling and stunning, respecting the natural instincts of pigs to remain in social contact with each other and minimising fear and stress caused by isolation.²⁵

From a commercial perspective, CO₂ stunning provides significant advantages for high-volume abattoirs:

- Group stunning using back-load techniques generates a high production rate, on average 3,500 a day in large abattoirs and up to 5,000 pigs per day.²⁶

²¹ Australian Veterinary Association, *Submission 860*, p. 4.

²² RSPCA Victoria, *Submission 1358*, pp. 9–10.

²³ Ibid.

²⁴ Dr Tony Peacock, Chair, Australian Pork Research Institute Ltd, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 39.

²⁵ Australian Meat Industry Council, *Submission 584*, p. 8.

²⁶ Shatha Hamade, Legal Counsel, Animals Australia, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 49.

- CO2 stunning reduces labour costs as abattoirs handle pigs in groups with automated equipment and low human intervention.²⁷
- Reduced stress on pigs also improves meat quality resulting in less carcass waste for abattoirs.²⁸

Disadvantages of CO2 stunning

Two major disadvantages were recognised by stakeholders in the use of CO2 stunning methods:

- the possibility of aversive and/or stressful responses in the period before loss of unconsciousness, reflected in behaviours such as gasping and vocalisation²⁹
- the possibility that pigs could regain consciousness after a period if they are not bled quickly after stunning to ensure death from blood loss.³⁰ Alternative gases and techniques continue to be trialled in recognition of this risk (see Section 4.2.3).

Aversive impacts of CO2 stunning

While stunning occurs with high concentrations of CO2 (>80%), RSPCA Victoria reports that prior to gaining unconsciousness, pigs show signs of aversion (strong dislike) with concentrations of carbon dioxide gas as low as 15%.³¹

During a public hearing, the Farm Transparency Project challenged the perception of the gassing of pigs as a more humane process:

When pigs reach six months of age or sows become less productive after a couple of years of repeated impregnation and farrowing, they are sent to slaughter. In 1992, 32 years ago, the pig farming industry quietly installed its first carbon dioxide gas chamber at a slaughterhouse in Corowa, New South Wales. Today these chambers are used in all major pig slaughterhouses as a way to render pigs unconscious or dead before their throats are cut open. Anyone who wanted to know what this looks like was told that it is the most humane method of stunning pigs before slaughter, that pigs just gently fall asleep. In 2014 we managed to install hidden cameras in that Corowa slaughterhouse, capturing and publicly exposing for the first time in the world what really happens inside those chambers. Subsequent investigations here in Victoria and in South Australia showed the exact same thing: that every pig who enters those chambers screams and thrashes as they slowly suffocate, desperately trying to escape until their last agonising breath. It was 10 years ago that the inherent unjustifiable cruelty of these chambers was first exposed, and yet Australian Pork Limited continues to spout this utter nonsense about pigs gently falling asleep.³²

²⁷ Victorian Parliamentary Budget Office, *Submission 432*, p. 13.

²⁸ Ibid.

²⁹ Australian Meat Industry Council, *Submission 584*, p. 8.

³⁰ RSPCA Victoria, *Submission 1358*, p. 10.

³¹ Ibid., pp. 9-10.

³² Chris Delforce, Founder and Executive Director, Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 13.

According to animal welfare groups and industry, these aversive responses can include:³³

- respiratory distress
- ‘air hunger’ (breathlessness)
- anxiety
- mucosal irritation
- pain.

Dr Melanie Latter of the Australian Veterinary Association told the Committee that the use of CO₂ is well recognised to be aversive. She said:

The milder thing is that it is an irritant to mucous membranes. But in fact with CO₂ – by its very nature, because when carbon dioxide rises in the bloodstream of any mammal the reaction is to increase its breathing drive because, obviously, everything wants to protect itself against suffocation – if your bloodstream CO₂ goes up, it is inherently aversive because you cannot breathe.³⁴

Veterinarians from SunPork Group told the Committee that while ‘CO₂ is adverse to pigs, particularly around areas where there are mucus layers in the back of the throat, there is certainly no burning of pigs from the inside’.³⁵

The Australian Veterinary Association submitted to the Committee that the kinds of aversive experience pigs suffer during CO₂ stunning depends on how the gas is administered:³⁶

- Slower, gradual increases in CO₂ concentrations are less aversive than immediate high concentration exposure but increases the time to unconsciousness and therefore extends the time that animals experience breathlessness. The Australian Veterinary Association says both the World Organisation for Animal Health and the American Veterinary Medical Association endorse this approach.
- High concentrations of CO₂ are initially more aversive but result in a faster time to unconsciousness.

While acknowledging the aversive impacts suffered by pigs from CO₂ stunning, industry places emphasis on the impact of ‘pre-slaughter factors’ dictating these responses, including:

- pig breed and genetic make-up
- habituation of pigs to human interaction

³³ Australian Veterinary Association, Submission 860, p. 4.

³⁴ Dr Melanie Latter, National Manager, Policy and Veterinary Science, Australian Veterinary Association, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 27.

³⁵ Dr Darryl D’Souza, Executive General Manager, Technical Services, SunPork Group, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 47.

³⁶ Australian Veterinary Association, Submission 860, p. 4.

- training and use of low-stress stock handling techniques.

According to the Australian Meat Industry Council: ‘Aversive reactions to CO2 stunning can be reduced through improved training and management practices that minimise stress to pigs through to the point of stunning.’³⁷

Pig farmer and welfare advocate, Tammi Jonas, provided anecdotal evidence that differed to industry assumptions regarding pig genetic make-up and aversive effects. Pigs from Ms Jonas’ farm were filmed as part of a 7.30 story on gassing in abattoirs. Ms Jonas told the Committee:

We knew that CO2 stunning is with an aversive gas and that a proportion of pigs were likely to have a very stressful reaction. The halothane gene is often talked about. Pigs that do not have the halothane gene are meant to have a lower stress response. We have been reassured that our breed – large black, an old, rare breed – does not have the halothane gene, so we have just sort of sat hoping that that meant that our pigs were not having that experience when they were being stunned. I mean, you never know with this kind of footage, but it did seem like it was a pretty high proportion of pigs having the reaction.³⁸

4.2.2 CO2 stunning: banning or mitigation?

The Committee received fundamentally opposing views from animal welfare groups and industry (including industry veterinarians) on the future merits of CO2 gassing as a method for stunning pigs before slaughter. Views divided on whether CO2 should be banned and replaced by another method, or whether the aversive impacts of CO2 stunning could be mitigated by further refinement of technology, handling techniques and training.

Banning: welfare groups

Animal welfare groups held that the aversive impacts that pigs suffered in CO2 stunning are intolerable and argued for the eventual banning of CO2 stunning in Victoria.³⁹ This view was supplemented by a large number of submissions (including many pro forma submissions) received by the Committee.

Animals Australia told the Committee that industry preference for CO2 stunning was primarily a commercial rather than welfare decision, a calculation of ‘necessary suffering’:

Necessary suffering was ‘Well, how many pigs can I kill in an hour? Can I maximise that?’ for whatever reason, economic reasons et cetera. So what they discovered was that the pig-gassing machines could allow, in the current day, abattoirs that are killing

³⁷ Australian Meat Industry Council, *Submission 584*, p. 8.

³⁸ Tammi Jonas, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 61.

³⁹ For example, see: Animals Australia, *Submission 232*, p3; People for the Ethical Treatment of Animals (PETA), *Submission 941*, p. 6; Animal Liberation ACT, *Submission 1522*, p. 2.

up to 5000 pigs a day through the gassing system. The average is about 3500 a day through the gassing system. This is about economies of scale. Animal welfare plays no part in any of this; this is really just codified cruelty to push out the economies of scale in these intensified industries.⁴⁰

Mitigation: industry groups

In contrast to animal welfare groups, pig industry representatives and leaders responded that, ‘although it is not perfect, CO2 stunning is the best and most balanced available method to humanely stun a pig.’⁴¹

Industry consistently presented the Committee with three key arguments for preferencing CO2 stunning:

1. Controlled atmospheric stunning, which minimises human interaction with pigs is by far the preferable mode for pre-slaughter stunning, and at this stage CO2 is the only economically and chemically viable gas to conduct this method.
2. CO2 is almost universally accepted and used worldwide to stun pigs.
3. Further improvements can yet be made on the procedures by which CO2 stunning is administered to minimise aversive responses.

Many pig producers who made submissions to the Inquiry – including PIC Australia, Western Plains Pork, JBS, and SunPork – all submitted that CO2 was the only available or viable method for stunning large numbers of pigs which minimised human handling.⁴²

Industry representatives told the Committee that welfare issues pertaining to CO2 gassing should not be considered ‘in isolation’ but within the overall stunning and slaughter process.⁴³ The Australian Meat Industry Council submitted to the Committee:

Consideration must be given, instead, to how holistic management practices culminate in observable welfare outcomes at slaughter and how awareness and training can support the effective application of this globally recognised best practice stunning method.⁴⁴

Furthermore, Tim Ryan from the Australian Meat Industry Council told the Committee that ‘if there are issues with the use of CO2, this is where we should first prioritise any necessary corrective actions.’⁴⁵

⁴⁰ Shatha Hamade, *Transcript of evidence*, p. 49.

⁴¹ Edison Alvares, *Transcript of evidence*, p. 37.

⁴² PIC Australia, *Submission 139*, p. 1; Western Plains Pork, *Submission 1483*, p. 3; SunPork, *Submission 470*, p. 1.

⁴³ Australian Pork Limited, *Submission 541*, p. 20.

⁴⁴ Australian Meat Industry Council, *Submission 584*, pp. 8–9.

⁴⁵ Tim Ryan, General Manager, Industry Affairs, Australian Meat Industry Council, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, pp. 14–15.

Mr Ryan also noted that RSPCA Victoria did not call for a phase-out of CO₂ gondola systems, but only a ban on side-loading systems (see Section 4.5).⁴⁶

Representatives from the Australian Veterinary Association told the Committee they broadly agreed: ‘while CO₂ is not perfect, we support opportunities for improvement of the current CO₂ system while the research into alternative gases and systems continues.’ They also recommended that domestic abattoirs be brought up to the same standard as export abattoirs, with a responsible person overseeing welfare at the site, whether that is a welfare officer or an on-plant veterinarian.⁴⁷

Commercial considerations

Mr Ryan also informed the Committee: ‘Commercial pig production is highly dependent on this use of CO₂ stunning.’ In both its written submission and public hearings, the Australian Meat Industry Council outlined possible commercial consequences if Victoria undertook a unilateral ban of CO₂ gassing techniques:⁴⁸

- Pig processing would move interstate and to facilities that could utilise CO₂ technology and operate at a lower cost base. Those pigs grown in Victoria would need to be transported greater distances to facilities interstate, creating new animal welfare challenges and possible biosecurity risks.
- The effective closure of many Victorian commercial pig processing facilities and a possible reduction in fresh pork supply.
- Mandated animal welfare requirements on pork produced could create internal trade barriers and challenge core elements of Australia’s Federation.
- If Victoria or other Australian jurisdictions restricted use of CO₂, it is likely there would be some diversion to imported-smallgoods pork channels, as domestic fresh pork supply declined and became more expensive.

The Australian Meat Industry Council said such ‘trade dynamics’ had played out in New Zealand, which bans CO₂ gassing as a pre-slaughter method (see Section 4.6). While New Zealand produces about only 10% the volume of the Australian pig industry, it consumes comparable volumes of pork per capita. According to the Australian Meat Industry Council, New Zealand has consequently become increasingly more reliant on importing pork products from countries using CO₂ stunning – including Australia. In 1990, pork imports accounted for 10% of consumption; in 2022, pork imports accounted for 64% of consumption.⁴⁹

FINDING 9: CO₂ gassing as a method of stunning is aversive to pigs who experience high levels of pain and stress.

⁴⁶ Ibid.

⁴⁷ Dr Yvette Pollock, Australian Veterinary Association, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 25.

⁴⁸ Australian Meat Industry Council, *Submission 584*, pp. 12–13.

⁴⁹ Ibid., p. 13.

4.2.3 Alternative gases

Given the known aversive responses pigs show to CO₂ gassing as a pre-slaughter method, research continues on alternative gases to conduct controlled atmospheric stunning.

The aim of this research is to find gases or gas mixtures that induce faster and longer stun times, and less aversive physiological reactions than CO₂.

Replacing or mixing CO₂ with inert gases (including helium, xenon, argon and nitrogen) is thought to induce a more 'gentle loss of consciousness without panic and air hunger'. This is because when inert gases rise in the bloodstream, they replace oxygen, inducing unconsciousness without CO₂ levels rising and avoiding the sensations of air hunger and breathlessness.⁵⁰

According to Australian Pork Limited, two decades of research into alternative gases have yielded no commercially viable gases.⁵¹ The Australian Veterinary Association and other veterinarians who gave evidence to the Committee also endorsed CO₂ as the best available method over other gases, acknowledging significant research is being done to identify viable alternatives.

As with CO₂ stunning, the pig industry makes both animal welfare and commercial considerations in assessing the viability of alternative gases.

The seriousness with which the industry approaches alternatives to stunning was questioned by some animal welfare advocates. Harley McDonald-Eckersall from the Farm Transparency Project told the Committee in a hearing that:

Right now millions of dollars of government funding – taxpayers money – is going to Australian Pork Limited. Despite that, there has not been any sign that they have been putting any of that into investing in alternatives to CO₂ stunning, in alternatives for sow stalls and farrowing crates. The industry has remained unchanged for 20 years.⁵²

Australian Pork Limited, the Australian Meat Industry Council and the Victorian Parliamentary Budget Office all provided detailed summaries of current research on alternative gases:

Argon and argon mixed with CO₂

- Argon is the most studied alternative gas for stunning, although little research has been conducted in the past 15 years.⁵³

⁵⁰ Dr Melanie Latter, *Transcript of evidence*, pp. 26–27.

⁵¹ Australian Pork Limited, *Submission 541*, p. 31; see also, Australian Veterinary Association, *Submission 860*, p. 4.

⁵² Harley McDonald-Eckersall, Strategy and Campaigns Director, Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 22.

⁵³ Australian Pork Limited, *Submission 541*, p. 32.

- There are conflicting results when the aversion of pigs to argon exposure was measured.⁵⁴
 - Exposure to sticking interval for gases such as argon is 25–45 seconds when less than 5 minutes of exposure to the inert gas occurs, compared to >60 seconds when exposed to CO₂ for a lesser amount of time.⁵⁵
 - Exposure to high concentrations for at least seven minutes significantly reduces signs of distress. The stunning time reduces when argon is mixed with carbon dioxide, but this increases signs of distress in pigs.⁵⁶
- Commercially, although it is the most common noble gas in the atmosphere, argon has limited availability and therefore increased cost compared to CO₂.⁵⁷

Helium

- To date, only a single study under experimental conditions has evaluated the response to helium. Exposure for three minutes resulted reliably in unconsciousness with no adverse behaviour shown however the stun-to-stick interval was limited to 15–30.⁵⁸
- The low density of the gas – helium is lighter than air, and a 98.5% mixture is needed to induce unconsciousness – makes it difficult to use in a gas pit and increases safety risks for staff.⁵⁹
- Helium is difficult to extract, thus the supply cost on a commercial scale is likely to be a barrier.⁶⁰

Xenon

- Xenon can be used as an anaesthetic in human medicine, however the high cost has prevented its use as a general anaesthesia.⁶¹
- The high cost also discounts its commercial viability in pig stunning.⁶²

Nitrogen and Nitrogen/CO₂ mixture

- Nitrogen is widely available as it is present in high concentrations (79%) in atmospheric air.
- Nitrogen is slightly lighter than air and is, therefore, hard to contain in a stunning pit at high concentrations.

⁵⁴ Ibid.

⁵⁵ Australian Meat Industry Council, *Submission 584*, p. 9.

⁵⁶ Victorian Parliamentary Budget Office, *Submission 432*, p. 14.

⁵⁷ Australian Pork Limited, *Submission 541*, p. 32; Victorian Parliamentary Budget Office, *Submission 432*, p. 14.

⁵⁸ Ibid., p. 32.

⁵⁹ Ibid., p. 32; Australian Meat Industry Council, *Submission 584*, p. 9.

⁶⁰ Victorian Parliamentary Budget Office, *Submission 432*, p. 14.

⁶¹ Australian Pork Limited, *Submission 541*, p. 32.

⁶² Ibid.

- Due to its chemical properties, nitrogen is not practical to contain in existing gas pits at the high concentrations necessary to achieve consciousness and would need to be mixed with carbon dioxide:
 - Pigs show less signs of distress when stunned with a mixture of nitrogen and 15% carbon dioxide, than carbon dioxide alone.⁶³
 - The stun time is higher than carbon dioxide (at least 3.5 minutes) though less than argon.⁶⁴
 - Australian Pork Limited report pigs return to consciousness sooner under N₂/CO₂ mixtures, which also can have negative effects on the meat quality.⁶⁵

4.2.4 International research into alternative gases

Internationally there is an ongoing commitment and research investment into improving stunning methods for pigs – including CO₂ gas mixtures, alternative gases (such as inert gases) and looking into alternative methods of stunning.

The EU ‘PigStun’ project is an encouraging initiative which seeks to provide non-aversive alternatives to CO₂. These include use of alternative gas combinations (e.g. helium and nitrogen) and retrofitting existing stunning systems to allow for inert gases. The benefit of inert gases is that they do not cause breathlessness and air hunger, so the loss of consciousness is less aversive than with CO₂.

The project is also looking at ways to improve electrical stunning to reduce pre-stunning handling. Issues such as human safety, availability of gases, affordability of alternate gases and the retrofitting of facilities will need to be addressed for the ultimate research findings to be applied in Australia.⁶⁶

4.2.5 Low atmosphere pressure

A proposed alternative to controlled atmospheric stunning, where oxygen is replaced with alternative gases (usually CO₂) is low atmospheric pressure stunning (LAPS). LAPS involves lowering the pressure in a stunning chamber by removing the air, thereby reducing oxygen that results in stunning by hypoxia.⁶⁷

Industry representatives consider LAPS as an unviable replacement to CO₂ stunning for the following reasons:

- Time to death was much longer (approximately 9–14 min) than current CO₂ systems, nor does the method always reliably euthanise all pigs.

⁶³ Ibid.

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Australian Veterinary Association, *Submission 860*, pp. 4–5.

⁶⁷ Australian Pork Limited, *Submission 541*, p. 33.

- LAPS systems would require more complex pig-handling compared to current CO₂ stunning, since multiple LAPS systems will be needed to reach an adequately high capacity for commercial application.
- Large vacuum pumps, tubing and airtight seals needed for a LAPS system would require significant investment and ongoing operational and maintenance costs.
- A major 2020 study found that:
 - Pigs subject to LAPS exhibited similar adverse behaviour to CO₂.
 - Examination of the pig carcasses subject to the LAPS treatment showed a high severity and incidence of haemorrhage and congestion of the lungs.⁶⁸
 - The majority of pigs suffered ruptured ear drums.⁶⁹

4.3 Electrical stunning

Electrical stunning involves applying a current through the brain to induce an epileptic seizure so that the animal becomes immediately unconscious and unable to feel pain.⁷⁰ According to Australian Pork Limited, electrical stunning today has largely been replaced by CO₂ stunning and is mainly used in small and medium-sized abattoirs worldwide.

In Australia, the Model Code of Practice recommends head-to-back electrical stunning of pigs, with a minimum of 400 V, 1.3 amps for 2s.⁷¹

Electrical stunning usually involves restraining pigs using a V-restraint. As noted at the beginning of the chapter, such handling has significant animal welfare implications, because the handling of pigs by humans causes substantial stress to the animal.

The Victorian Parliamentary Budget Office reported that the manual restraint is common in Europe, predominantly in smaller abattoirs. The European Food Safety Authority reports that welfare issues are more common in abattoirs that rely on manual restraint without equipment.⁷²

RSPCA Victoria note that while the restraint procedures are an inherent and unavoidable feature of electrical stunning, other variables can be controlled and improved with further research and training. These include:

- poor implementation, often attributed to unskilled personnel
- rough handling and wrong use of parameters

⁶⁸ Australian Meat Industry Council, *Submission 584*, pp. 9–10.

⁶⁹ Australian Pork Limited, *Submission 541*, p. 33.

⁷⁰ Australian Meat Industry Council, *Submission 584*, p. 10.

⁷¹ Australian Pork Limited, *Submission 541*, p. 31.

⁷² Victorian Parliamentary Budget Office, *Submission 432*, pp. 14–15.

- quality of stunning equipment
- stockpersons handling and interaction with pigs.

Pig industry representatives and the Victorian Parliamentary Budget Office noted the use of restrains also, in turn, has commercial implications:⁷³

- higher labour costs from manual handling
- capital cost of equipment
- higher carcass waste due to stress from physical restraint which can induce physiological changes that negatively affect the quality of meat.

There are two techniques for electrical stunning:

1. Head-only electrical stunning
2. Head-to-body electrical stunning.

According to animal welfare groups, head-to-body electrical stunning provides far superior animal welfare outcomes. The Model Code of Practice strongly recommends—but does not dictate—the use of head-to-body electrical stunning.⁷⁴

4.3.1 Head-only electrical stunning

Head-only electrical stunning systems involves the following standard procedure:

- Pigs are moved and restrained.
- Tongs with electrodes are placed manually or automatically on the head of pigs, which pass an electrical current through the brain causing immediate unconsciousness.
- Stunned pigs are released from the restraint and immediately bled immediately.

Head-only stunning is reversible and only causes unconsciousness for a very short period (less than 30 seconds) before pigs begin to regain consciousness. Immediately bleeding pigs after stunning minimises the risk of pigs regaining consciousness during the bleed out process.

According to RSPCA Victoria, head-only stunning presents several welfare risks:⁷⁵

- Individual handling and restraint disable pigs' natural behaviour to move in groups and walk side by side, increasing stress.
- Individual handling and restraint increase the risks of excessive force and electric prodders being used to move pigs.

⁷³ Australian Meat Industry Council, *Submission 584*; Victorian Parliamentary Budget Office, *Submission 432*, pp. 14–15.

⁷⁴ Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 21.

⁷⁵ *Ibid.*, p. 12.

- Incorrect placement of electrodes and/or use of inappropriate electrical parameters increases the risk that pigs will receive pre-stun shocks and be ineffectively stunned.
- Electrical stunning induces the shortest period of unconsciousness compared to other stunning systems, increasing risk of pigs regaining consciousness during bleeding.

4.3.2 Head-to-body electrical stunning

Head-to-body stunning involves passing a current through both the brain and heart to induce cardiac arrest.

According to RSPCA Victoria, the head-to-body stunning method returns superior animal welfare outcomes as it induces irreversible unconsciousness and death, whereas head-only electrical stunning only renders pigs unconscious for several seconds.

As with head-only electrical stunning, head-to-body electrical stunning also requires pigs to be individually handled and restrained, which is stressful for pigs.

While preferred to head-only stunning, RSPCA Victoria notes several key risks with the method in addition to handling, restraint and misplaced electrode risks also common to head-only stunning:⁷⁶

- Risk of incorrect electrode placement
- Risk of poor electrode contact
- Risk of too short exposure time
- Risk of inappropriate electrical parameters, which can lead to ineffective stunning and pigs experiencing pain and fear.

4.3.3 Alternative electrical stunning methods

Australian Pork Limited submitted two further proposed electrical methods for the pre-slaughter stunning of pigs, neither of which it yet deems viable alternatives to existing electrical stunning methods.

Microwave stunning

Microwave stunning has been proposed as an alternative method for reversible Halal stunning of cattle and has not been studied in pigs. This technology is still experimental. There are doubts whether microwave stunning can achieve sufficient, long-term unconsciousness. An added disadvantage of this method is that the head needs to be restrained during the application, which would be highly aversive to pigs.

⁷⁶ Ibid., p. 13.

Australian Pork Limited concludes microwave stunning holds no advantage over existing electrical stunning methods.⁷⁷

Single pulse ultra-high current

Single Pulse Ultra-High Current (SPUC) is another potential alternative to head only electrical stunning. It has been studied in cattle but not pigs. The method requires operators use a firm restraint, which is both a stressor for pigs and is labour intensive, making it less efficient than other electrical stunning methods.⁷⁸

4.4 Penetrative captive bolt

Penetrative captive bolt devices cause irreversible unconsciousness by striking the forehead in a way that extensively damages both the skull and brain of pigs. Pigs are individually handled and restrained as the captive bolt is applied, causing stress for the animal.⁷⁹

According to Australian Pork Limited, penetrative captive bolt devices are mostly used for stunning before slaughter of cattle but may be used in very small abattoirs as the main stunning method for pigs.⁸⁰ It is used mostly for euthanasia, emergency slaughter or as a backup in case of a mis-stun.⁸¹

In abattoirs using penetrating captive bolt devices, pigs are typically moved in single file into a box where they are individually restrained before the captive bolt is applied to the pigs' foreheads. While the technique typically achieves irreversible unconsciousness if applied correctly, in some cases pigs can regain consciousness and therefore must be bled after stunning to ensure death.⁸²

RSPCA Victoria notes several key welfare issues associated with this technique, some of which are similar to electrical stunning due to handling and restraint requirements:

- Individual handling and restraint disable pigs' natural behaviour to move in groups and walk side by side, increasing stress.
- Individual handling and restraint increase the risks of excessive force and electric prodders being used to move pigs.
- Incorrect placement of the penetrating captive bolt, which can be difficult due to the shape and thickness of boars and sows skulls.
- With no automated system currently available, penetrative captive bolt is more liable to human error.

⁷⁷ Australian Pork Limited, *Submission 541*, p. 33.

⁷⁸ Ibid.

⁷⁹ Australian Meat Industry Council, *Submission 584*, p. 10.

⁸⁰ Australian Pork Limited, *Submission 541*, p. 31.

⁸¹ RSPCA Victoria, *Submission 1358*, p. 14.

⁸² Ibid.

4.5 Side-load and back-load stunning systems

There are two main types of CO₂ stunning systems used in Australia:

- side-loading (single file) systems, where pigs are moved in small groups and then loaded in single file into the gondola for stunning through the side
- back-loading (group) systems, where pigs are moved in small groups with usually an automatic wall that slowly pushes pigs into the gondola from the back.

The side-loader system is an older design which has been replaced with the improved back-loader system.⁸³

Industry representatives, veterinarians and animal welfare groups all considered the backloading systems preferable as they minimise human handling. According to the Australian Veterinary Association, backloading:

can provide welfare benefits to handling pigs preslaughter, because they allow pigs to maintain their natural behaviour of moving in groups throughout the stunning process. Side-loading CO₂ stunning systems require pigs to be individually handled and sometimes restrained, which is considered more stressful for pigs.⁸⁴

The Australian Veterinary Association added that many processes in Australia have moved from using side-loading CO₂ systems to back-loading CO₂ stunning systems. 'While most of the export abattoirs have invested in back-loader systems, there are still some abattoirs that use sideloading CO₂ systems, so this is an area for improvement that will require significant investment.'⁸⁵

SunPork, a major pork producer, told the Committee it endorses the use of backloading techniques only.⁸⁶

RSPCA Victoria and other animal welfare groups told the Committee they recommended the banning of side-loading systems to maximise pig welfare at slaughter.⁸⁷

RECOMMENDATION 7: The use of side-loader (single file) carbon dioxide stunning systems must be phased out to minimise pre-slaughter stress in pigs.

⁸³ Ibid., p. 10.

⁸⁴ Australian Veterinary Association, *Submission 860*, p. 4. See also, RSPCA Victoria, *Submission 1358*, p. 10.

⁸⁵ Australian Veterinary Association, *Submission 860*, p. 4.

⁸⁶ SunPork, *Submission 470*, p. 1.

⁸⁷ RSPCA Victoria, *Submission 1358*, p. 14.

4.6 International comparison

In a comparative analysis of mechanical stunning methods in similar jurisdictions, the Department of Energy, Environment and Climate Action reported to the Committee that Victorian regulations (following the Australian Model Code) are broadly consistent with overseas regulations and practices. In the case of mechanical stunning, Victoria (and Australia) is more stringent than methods used overseas.⁸⁸

Table 4.1 International comparison of mechanical stunning methods

Jurisdiction	Controlled Atmospheric Stunning regulations	Electrical stunning regulations	Regulations for mechanical stunning
Australia	Stunning pigs by exposure to mixtures of air and CO ₂ are acceptable.	Pigs should be electrically stunned, and head-to-back stunning to induce cardiac arrest is strongly recommended (400 volts, 1.3 amps for 2 seconds).	Mechanical stunning is acceptable for pigs but shall only be practised in special situations, such as emergency slaughter of sick or injured animals or for the stunning of large sows or boars with a penetrating captive-bolt.
Canada	Exposure to a gas or a gas mixture in a manner that causes rapid loss of consciousness.	Applying an electrical current in a manner that causes an immediate loss of consciousness.	Delivering blow to the head with a mechanical device in a manner that causes an immediate loss of consciousness.
UK	Pigs may be killed at a slaughterhouse by exposure to CO ₂ gas mixture in a chamber. A CO ₂ gas mixture shall mean at least 70% CO ₂ by volume in atmospheric air.	Permits use of electrodes to stun any animal.	Permits any animal to be stunned by captive bolt or concussion.
European Union	Permits carbon dioxide gas at high concentration CO ₂ mixture associated with inert gases, inert gas mixture such as Argon or Nitrogen.	Permits head-only electrical stunning, head-to-body electrical stunning.	Permits penetrative captive bolt, percussive blow to the head (piglets up to 5 kg), firearm with free projectile.
New Zealand	Not included as a permitted stunning method.	Permits head-only electrical stun, head-to-body electrical stun.	Permits captive bolt and free-bullet firearm.
United States	Permits slaughter of swine with the use of CO ₂ gas.	Permits slaughter of swine with the use of electric current.	Permits slaughter of swine by using captive bolt stunners and by shooting with firearm.

Source: Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, pp. 20–21.

⁸⁸ Department of Energy, Environment and Climate Action and PrimeSafe, *Submission 425*, p. 20.

4.7 Conclusion

The Committee understands the reasoning behind the stunning of pigs prior to slaughter. However, the Committee also recognises that the process is currently highly aversive for pigs. It is clear that current methods of stunning, in particular CO₂ gassing, causes substantial suffering for the pigs prior to their death.

While it is clear that stunning methods are used that will allow for large numbers of pigs to be processed in a short period of time, thus maximising the economic benefits, it is the Committee's view that alternative methods of stunning must be found. While acknowledging the evidence given to the Committee that there is substantial research being undertaken, more needs to be done to fast track alternative approaches to the stunning of pigs. Therefore, the Committee considers it is essential that the Victorian Government provide funding for further research into alternative methods.

RECOMMENDATION 8: That the Victorian Government work with industry to innovate research and development opportunities to commercially viable alternatives to the use of CO₂ in stunning pigs prior to slaughter and report on alternatives with a reporting date no later than May 2026.

Chapter 5

Confinement practices

5.1 Introduction

There are a number of different confinement practices employed for farmed pigs during their lives, and these vary depending on the stage the animal is at. The following sections provides an overview of the main confinement methods employed within the Victorian pig industry:

- mating stalls
- sow stalls (gestation stalls)
- farrowing crates
- boar stalls.

5.2 Mating stalls

A mating stall is an enclosure in which a sow is kept for the purposes of mating/ breeding. After a sow's piglets are weaned, a sow will typically come back onto heat (oestrus) within a few days. A sow which is 'on heat' can be successfully mated. Sows are typically housed in mating stalls from weaning up until five days post mating.¹

5.2.1 Purpose of mating stalls

According to Australian Pork Limited, mating stalls ensure that sows are protected from other sows that are also on heat during this period. In its submission, Australian Pork Limited said that when a sow is on heat, she can display aggressive behaviours such as mounting and riding of other sows and nosing and chasing behaviours. While such behaviours are natural and only last for a few days, they can lead to serious injuries of both the sows displaying the behaviour as well as those that are on the receiving end of the behaviour. The submission also suggests that the mating stalls are also important for protecting the stockperson from these sow behaviours as well and facilitating a successful mating (particularly if mating is undertaken via artificial insemination).²

1 Australian Pork Limited, *Submission 543*, p. 40.

2 Ibid.

Representatives of the Australian pork industry have advised that sows are kept in a mating stall for up to five days after they are mated for two reasons:³

- Keeping the sow in a mating stall (and therefore safe from other sows) protects her during the early stages of fertilisation and embryo development, greatly increasing the chances of a successful pregnancy.
- It allows sows to be mixed back into their groups all at the same time, when the entire cohort (group) has come off heat. This “early mixing” strategy is a key success factor for group housing. By mixing sows at the same time, this shortens the stressful mixing period. Rather than gradually adding sows to the group after each mating and aggression occurring with each addition over the space of a week, sows are mixed all at once and their natural hierarchy established.

Australian Pork Limited noted that if sows are housed in mating stalls from weaning until five days post mating, they will on average spend 10 days in a mating stall before moving to either a gestation stall or group housing.⁴

Chris Richards from Apiam Animal Health said that while there were ‘few barriers’ to banning sow stalls, the mating stall remained a significant aspect to pig welfare within the industry. He told the Committee in a public hearing that:

I think that is still a very important part, particularly when we have got animals that are in oestrus and can potentially be showing health issues as well, so we want to be monitoring their food intakes and monitoring other things as well.⁵

Dr Paul Hemsworth agreed, telling the Committee that he and colleagues had undertaken a study a number of years ago comparing the stress response of sows that were weaned into groups and sows weaned into stalls. He said that:

the stress response in the group-housed sows was certainly elevated compared to those in stalls, and that is probably associated with mixing unfamiliar pigs, which does occur when the sows are removed from their farrowing accommodation and mixed with other pigs, other sows.⁶

Dr Hemsworth said that the study also looked at the stress response following insemination. Comparing sows that had been in mating stalls and were then grouped shortly after mating and those sows that had been in groups then were put back into groups after mating, they found there was no difference in their stress physiology.

Dr Hemsworth said that the study suggested that:

if you are going to wean sows, if you are interested in reducing the stress response, you probably should wean them into mating stalls.⁷

³ Ibid., p. 41.

⁴ Ibid., p. 41.

⁵ Dr Chris Richards, Managing Director, Apiam Animal Health, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, pp. 46–47.

⁶ Professor Paul Hemsworth, Animal Welfare Science Centre, University of Melbourne, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, pp. 54–55.

⁷ Ibid.

There were a number of contributors to the Inquiry who objected to the practices employed in artificial insemination of pigs in the industry. A number of submissions objected to the practice on grounds that it means sows are pregnant for the majority of their lives. In some cases, it has been equated to sexual assault of the animals and therefore considered to be bestiality.⁸ It is acknowledged that artificial insemination is widespread within the agricultural sector as it increases ‘production’ of animals and therefore the product of the industry. Despite its widespread acceptance within the industry, a number of contributors saw it as ‘invasive and degrading’.⁹

The Committee also heard evidence which suggested that other than productive advantages, artificial insemination had some welfare benefits. Apiam Animal Health submitted that artificial insemination is the predominant method of breeding commercial pigs in Australia and that it had:

proven to be safe for staff and animals, it reduces the numbers of boars required on farm, reduces the risk of disease transmission by drastically reducing the movement of live breeding pigs between farms, and reduces the risk of injuries to people from handling boars.¹⁰

The Committee recognises that artificial insemination is standard practice within the agricultural sector as it increases production levels. However, on animal welfare grounds it is important that all practises in the husbandry of animals within the agricultural sector are proven to be humane and minimise stress to the animals. Such evidence was not provided to the Committee.

Currently, while it is clear that artificial insemination is undertaken at an industrial scale within the pork industry, there is little public reporting about the processes and practises undertaken on individual farms. In the Committee’s view, transparency requires these practises to be monitored and reported.

RECOMMENDATION 9: That the Victorian Government mandate reporting on the methods of procurement and extraction of semen from boars, and the frequency of each boar used, the method, dates, and frequency of the artificial semination of each sow.

5.3 Sow stalls (gestation stall)

A sow stall, also known as a gestation stall, is a metal-barred crate that houses a single female breeding pig for part of her 16-week gestation (pregnancy). A standard sow stall is only 2m long and 60cm wide. While in the sow stall, the sow can stand up and take a step forward or backwards, but she is unable to turn around. The floor of the stall is usually concrete, with a slat-covered trench to catch urine and faeces at the back.¹¹

⁸ For example, Jan Saunders, *Submission 323*; Martin Derby, *Submission 361*; Farm Transparency Project, *Submission 513*; Ellie Robertson, *Submission 520*.

⁹ For example, see Lucia Smith, *Submission 283*, p. 4.

¹⁰ Apiam Animal Health, *Submission 365*, p. 5.

¹¹ RSPCA Victoria, *Submission 1358*, p. 15.

A sow will be moved from a mating stall into a gestation stall after she has been mated. Gestation and mating stalls are similar in design and both are intended to protect the sow and allow for individual care during the most vulnerable time of her breeding cycle. In Australian systems that use gestation stalls, sows will be typically housed in sow stalls for the first 28 days of gestation. A sow will cycle every 21 days and will return to heat if pregnancy has not been successful within this 28-day period. Furthermore, sows can reliably be pregnancy checked via ultrasound after 21 days gestation. Those sows that are confirmed pregnant will be moved to group gestation housing at around day 28 of gestation.¹²

Under Victorian regulations, there is a legal requirement that pigs can be kept in a gestation stall for less than or equal to 42 days (six weeks).¹³

Sows can be successfully housed in groups, provided they are properly managed and have sufficient space and environmental enrichment. Group housing of gestating pigs allows them to engage in exploratory and foraging behaviour, and to interact socially with other pigs.

RSPCA Victoria suggested in its submission that a ban on sow stalls should be an expectation in the development of any new standards and guidelines for pigs.¹⁴ In the Committee's view, the Victorian pig industry should aim to phase out all remaining sow stalls in favour of group housing systems for gestating sows.

Australian Pork Limited told the Committee that the majority of sows in Australia are housed in group or loose housing systems from five days post insemination and therefore are not housed in gestation stalls at all. Those that still employ the use of gestation stalls do so according to the standards set out in the Model Code of Practice for the Welfare of Animals: Pigs (third edition) (MCOP).¹⁵

5.3.1 2017 sow stall 'phase out'

Commercial pig production has historically involved a move away from group housing of sows to individual housing using sow stalls. According to APL, gestation stalls were designed to provide protection for individual pregnant sows, which can prevent both injuries and abortions. Gestation stalls also allow sows to be protected while they were individually fed according to their unique needs inspected easily for any signs of illness and individually treated.¹⁶

In 2010 the Australian pork industry agreed to an industry-led voluntarily phase out of gestation stalls for sows by 2017. The agreement followed the release in 2008 of a review of new Model Code of Practice for the Welfare of Animals: Pigs. The new,

¹² Australian Pork Limited, *Submission 543*, p. 41.

¹³ *Ibid.*, p. 36.

¹⁴ RSPCA Victoria, *Submission 1358*, p. 15.

¹⁵ Australian Pork Limited, *Submission 543*, p. 41.

¹⁶ *Ibid.*, p. 36.

third edition provided for a ten year implementation for producers to meet the new requirement of 42 days (6 weeks) maximum in gestation stalls.

There was some doubt expressed by some animal welfare groups about the commitment of the industry to change.

The last data that we have seen published from them was their 2021 annual report, and it was about a four-fifths uptake of the voluntary phase-out. We investigated a number of piggeries in Victoria a couple of years ago. We found six. Pretty much every place that we visited still had sow stalls. At Midland Bacon they have this massive shed full of hundreds of sow stalls, one of the largest that I have seen, and that is still operating today. I believe maybe one or two of the other six have since stopped using sow stalls, but it is still quite widespread. It seems like the industry has kind of given up on that phase-out, because they have stopped publishing that data.¹⁷

The industry told the Committee that the phase out was defined as reducing the use of gestation stalls from six weeks to a maximum of five days from last mating. Gestation-stall free pork production was defined by an expert group of producers and researchers as sows being loose-housed i.e. sows can get up and down and turn around from five days after insemination/mating until being moved into farrowing housing.¹⁸

The industry announcement was accompanied by added pressure from retailers to further reduce the time spent in sow stalls. Many of the pork producers supplying these retailers have transitioned to group/loose housing for all sows from weaning and gestation up until entry to the farrowing facility for the subsequent farrowing and lactation period. Under these retailer-led requirements ('Option B' under APIQ[✓]® certification, see below) sows can be kept in a mating station for a maximum of 24 hours to facilitate artificial insemination.¹⁹

Voluntary or involuntary phase out?

Figures provided to the Committee during the Inquiry indicate that a little more than 80% of the pork producers have phased out sow stalls. While this is clearly a positive move, it leaves a significant number of stalls still in operation and the Committee is very concerned about the welfare implications of this.

Throughout the Inquiry, industry representatives have been keen to emphasise the success of this phase out. In a public hearing, Margo Andrae of Australian Pork Limited told the Committee that they were very proud of the industry-led voluntary phase out of sow stalls and claimed 88% of the national production was now sow stall free and that this came at a significant cost to the producers. She said:

Stepping forward and doing an industry voluntary phase-out of their own choice and at their own expense, I think, should be acknowledged. Even 88 per cent, plus the smaller

¹⁷ Chris Delforce, Founder and Executive Director, Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 16.

¹⁸ Australian Pork Limited, *Submission 543*, p. 36.

¹⁹ *Ibid.*, pp. 36–37.

ones that we know are not even using sow stalls, is a fantastic achievement for the industry.²⁰

On the other hand, animal welfare groups asserted that the phase out was not voluntary or science-led, but forced by pressure from activists and retailers. Glenys Oogjes of Animals Australia told the Committee that

They were forced to do this, and when I say that, they were forced through Animals Australia's campaigns and exposés way back then – that is, in the early 2000s. And it was also because Coles first – and then other supermarkets followed – decided that they would take up that issue. Essentially, if your primary buyers – Coles and Woolies, for example – are moving away from wanting to sell pork that has been produced, if you like, or at least the mothers of the pigs that become the meat were kept in sow stalls, then that is going to shift the dial, and it did. But it was on a voluntary basis, as I say; it had to be forced. They only did it reluctantly.²¹

FINDING 10: The Victorian pork industry is yet to fully comply with their volunteer phaseout of the use of sow stalls, set to be complete by 2017.

New quality assurance regime

As discussed in Chapter 3, APIQV[®] is the most widely adopted quality assurance program for pig producers in Australia, with 91% of Australian production voluntarily adopting the program nationally.

In response to the industry's voluntary phase out, APIQV[®] developed a new rating regime for producers that complied with the agreement:

- **Option A:** available since 2013, for verified producers that keep sows in loose/group housing from at least five days after mating until one week before farrowing. This is the minimum verification for being recognised gestation-stall free.²²
- **Option B:** available since 2014, use of stalls for a maximum of 24 hours for mating only. This verification is in response to additional customer and market specifications, and has been developed in by Australian Pork Limited in conjunction with Coles supermarket. (Also know Customer Specifications for Supply to Coles Supermarkets Australia Pty Ltd (Coles) (Csc)).²³
- **Free range:** The standard under which farms are verified as Free Range includes:
 - The piggery provides suitable paddocks with feed, water and shelter facilities to meet all pigs' social and physiological requirements when kept in an outdoor environment.

20 Margo Andrae, Chief Executive Officer, Australian Pork Limited, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 12.

21 Glenys Oogjes, Chief Executive Officer, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 49.

22 Australian Pork Limited, *Submission 543*, p. 34.

23 *Ibid.*, pp. 26, 34.

- Impacts on the environment and stocking rates are managed according to APIQ✓[®] Environmental Standards.

Compliance with APIQ verifications

Australian Pork Industry Ltd note the following:²⁴

- 91% of our industry is APIQ✓[®] accredited.
- 88% of APIQ✓[®] accredited farms are certified, through an annual independent audit, as complying with Option A.
- This equates to 80% of the Australian commercial sow herd being certified as complying with Option A under APIQ✓[®].

Australian Pork Limited noted in its submission that the remaining 20% of the industry are yet to be formally verified under APIQ✓[®] Option A.²⁵ According to industry groups, major producers and veterinarians, 80% compliance with Option A under APIQ accreditation constitutes a successful industry-led phase out. The Committee heard from a number of industry groups, companies and affiliated associations that saw this phase out as a significant success.²⁶ JBS, a major pork producer, for example, told the Committee that ‘it was proud to lead the Australian pig industry on the phase out, making the commitment in 2007 and removing all gestation stalls by 2014’.²⁷

Regarding the 20% that have not complied, Australian Pork Limited note there is no formal data on non-APIQ✓[®] accredited farms. Information collected through extension roadshows, producer phone calls and industry feedback indicates a range of reasons why farms may not have sought formal accreditation for their status against the voluntary phase out, including the small size of the farm and a decision not to invest in APIQ✓[®] accreditation.

Animal welfare groups cite several deficiencies with the industry-led phase out. As summarised by Animals Australia, these include:²⁸

- Not real freedom: Australian Pork Limited never intended for the voluntary phase-out to free sows from confinement because their definition of ‘loose housing’ includes other forms of confinement. The phase-out also fails to address access to the outdoors, social isolation, or barren stalls without bedding/nesting material.
- Not all producers: The voluntary phase-out was only ever intended to apply to Australian Pork Limited members (~38% of pork producers accounting for 94% of pig meat products) so there are producers who do not even come under the voluntary scheme.

²⁴ Ibid., p. 9.

²⁵ Ibid., p. 9.

²⁶ Includes Australian Pork Limited, the Australian Meat Industry Council, the Australian Veterinary Association, Apiam Animal Health, SunPork and JBS.

²⁷ JBS Australia, *Submission 142*.

²⁸ Animals Australia, *Submission 232*, pp. 17–18.

- No independent oversight: There is no independent verification because the voluntary phase-out is overseen by the Australian Pork Industry Quality Assurance Program (APIQ) which is owned and managed by Australian Pork Limited.
- No penalties for non-compliance: The phase-out was voluntary, with no mechanisms to penalise Australian Pork Limited members who continue to confine sows in sow stalls.

Options for banning sow stalls

In a public hearing, the Committee was advised by Mr Dougal Purcell, the Acting Chief Executive for Agriculture Victoria, that Agriculture Victoria is an active member in the national Animal Welfare Task Group, which oversees the development of these national standards and guidelines.

He said in a public hearing that this welfare task group is ‘currently developing Australian animal welfare standards and guidelines for livestock at processing establishments’.²⁹

According to Mr Trevor Pisciotta, also of Agriculture Victoria, national standards and guidelines generally go through an independent scientific review process where an independent panel provides advice to the officials that are developing the standards and guidelines. He said the development of regulations in Victoria also involved consulting expert advice, the community and the impacted sectors.³⁰

Mr Pisciotta told the Committee that the process for developing regulations around sow stalls would involve the work of the national Animal Welfare Task Group. However, he told the Committee:

There has been to date no commencement of that work and there is no date set for the commencement of that work. That is kind of the national process, and I think in general Victoria’s preference has been to engage in national processes, because we appreciate that many of our livestock industries operate across jurisdictional borders and there is a lot of benefit to having nationally consistent regulations in relation to the treatment of animals. So that is always the first port of call.³¹

He said that it is open to Victoria to take steps beyond the national process, but ‘the preference is often for national consistency, and in part that is about thinking about what impact any changes Victoria makes might have on industry decisions, where they locate and so on and so forth’.³²

²⁹ Dougal Purcell, Acting Chief Executive, Agriculture Victoria, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 7.

³⁰ Trevor Pisciotta, Executive Director, Animal Welfare Victoria and Agricultural Regulatory Policy, Agriculture Victoria, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 8.

³¹ Ibid.

³² Ibid.

Apiam Animal Health veterinarian, Chris Richards, said he saw ‘no barriers’ for including the banning of gestational stalls in forming the part of future guidelines and standards as ‘most of the industry is already abiding by that’.

I think you will find that over time those numbers just naturally increase as the industry consolidates and the smaller guys exit the industry, because if you think about why they would not convert now – since we have got all the science to back up getting very good performance out of group sow housing – the only reason they would not do it would be because of the capital spend because they are looking at potentially exiting the industry.³³

The Committee is concerned that the voluntary phase out of sow stalls has not been completed despite the deadline being seven years ago. It is also concerned that there appears to be no significant national move within government to progress a process that would see sow stalls removed from the industry. Rather than wait for governments across Australia to take action, the Committee considers it imperative that the Victorian Government act immediately. Should there be national regulations or guidelines put in place, Victoria would be able to adjust as required.

FINDING 11: The Committee considers that the voluntary phasing out has not worked and that legislation is required to ensure they are removed from the industry completely.

RECOMMENDATION 10: That the Victorian Government legislate a complete ban on the use of sow stalls.

5.4 Farrowing crates

A farrowing crate is a metal-barred crate that is similar in size to a sow stall but slightly narrower. Farrowing crates are used to house female breeding pigs from around one week before farrowing (giving birth) until piglets are weaned, which can be up to six weeks. The gestation period of a sow is around 16 weeks and sows typically have two litters of piglets per year, meaning they may be confined for up to 12 weeks each year in farrowing crates.³⁴

The minimum space requirement in the Standards for a farrowing crate is 0.5 metres by 2 metres. The total farrowing crate and creep area is 3.2 metres squared. Animal Australia says that the use of farrowing crates is ‘equivalent of keeping a large (up to 250kg), heavily pregnant (then lactating) animal in a footprint similar to that of a standard bathtub for a month and a half. She can stand up or lie down, but cannot turn around, nor even properly interact with her piglets.’³⁵

³³ Dr Chris Richards, *Transcript of evidence*, pp. 46–47.

³⁴ RSPCA Victoria, *Submission 1358*, p. 19.

³⁵ Animals Australia, *Submission 232*, p. 19.

Farmers told the Committee a sow typically spends 25 days in a farrowing crate per breeding cycle.³⁶

Animals Australia estimates it is likely more than 85% of Australia's 265,000 breeding sows are confined to farrowing crates for between four and six weeks per reproductive cycle – usually a few days or up to a week prior to farrowing, and then three to four weeks before the piglets are weaned. Sows in commercial piggeries are typically bred twice a year for approximately two years (there is an average of 4.8 litters per sow). If bred for twice a year for two years, sows will spend approximately six months—or a quarter of their lifetime—confined in farrowing crates.³⁷

While Australian Pork Limited did not dispute the size or limitations of farrowing crates, they did have a more positive view of them, suggesting that they allow a sow to stand up, lie down, and stretch out, while keeping her piglets safe in a separate section. The crate still allows the sow to nurse her piglets.³⁸

5.4.1 Adversive impacts

RSPCA Victoria, Animals Australia and other animal welfare groups report that key animal welfare concerns for sows associated with the use of farrowing crates include:

- severe movement restriction leading to insufficient rest, muscle weakness, and injuries
- increased levels of stress and increased pain during farrowing
- inability to fulfil behavioural needs, such as foraging, nest seeking, and nest building before farrowing
- inability to perform maternal behaviours and initiate social interaction with their piglets
- lack of agency and ability to choose to move away from the nest and piglets when they need
- increased levels of stress and displays of aggressive behaviours in piglets during weaning
- malnutrition, due to restricted feeding and chronic hunger due to limited if any roughage
- negative affective states such as boredom, loneliness, helplessness, frustration and depression, and absence of positive affective states such as contentment.³⁹

³⁶ Tim Kingma, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 31; David Wright, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 31.

³⁷ Animals Australia, *Submission 232*, p. 19.

³⁸ Australian Pork Limited, *Submission 543*, p. 41.

³⁹ RSPCA Victoria, *Submission 1358*, p. 19; Animals Australia, *Submission 232*, p. 20.

5.4.2 Farrowing crates and piglet mortality

A long-held view within the pork industry regarding free-farrowing systems is that they increase the risk of piglet crushing and thus increase pig mortality. Recent scientific evidence shows that while temporary farrowing crates and free-farrowing pens can slightly increase the risk of piglet mortality (14% higher in farrowing pens than farrowing crates), alternative farrowing systems have been shown to benefit both sow and piglet welfare.⁴⁰

Industry representatives and veterinarians defended the use of farrowing crates as reducing piglet mortality as they minimise sows crushing piglets.⁴¹

Several animal welfare groups presented evidence to the contrary. Tammi Jonas told the Committee:

Farrowing stalls are justified by industry to reduce piglet mortality, predominantly from squashing. Yet the industry reports an 11.5 per cent pre-weaning mortality rate on average amongst intensively-raised pigs, whereas several of AFSA's members who raise pigs outdoors on pasture report an average of just 10 per cent, belying the need to confine sows in the first place.⁴²

According to Animals Australia, the European Food Safety Authority (EFSA) Panel on Animal Health and Welfare has reviewed all relevant information and concluded that comparable piglet survival rates could be achieved with temporary confinement (as few as three days) in larger spaces (4.3–6.3 m²) with enrichment (additions to create a more stimulating environment). The majority (80%) of crushing deaths occur within the first 72 hours, and removing confinement on day three, four or seven can improve sow welfare and manage piglet deaths while maintaining commercial viability.⁴³

Dr Paul Hemsworth acknowledged in a public hearing that farrowing crates have some disadvantages, too, but suggested that they reduce live-born piglet mortality generally—that is, piglets dying in the first few days after birth. He also suggested that the confinement early on is probably not a substantial issue for the sow because normally, in the early part of lactation she is fairly immobile.⁴⁴

Not everyone in the industry supports the use of farrowing crates. Tammi Jonas, a smaller scale pork producer from Central Victoria, told the Committee that the stalls should be phased out entirely. She said that because the stalls don't allow the pigs to turn around, but only lie down and stand up, these pigs often carry sores on their back from rubbing up and down the stall bars. She told the Committee:

⁴⁰ RSPCA Victoria, *Submission 1358*, p. 20.

⁴¹ Australian Veterinary Association, *Submission 860*, p. 7; Australian Pork Limited, *Submission 543*, p. 41; Dr Rebecca Athorn, Manager, Production Innovation, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 6.

⁴² Australian Food Sovereignty Alliance, *Submission 573*, p. 9; Tammi Jonas, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 61.

⁴³ Animals Australia, *Submission 232*, p. 20.

⁴⁴ Professor Paul Hemsworth, *Transcript of evidence*, p. 55.

We think it is totally inhumane, and we do not think there is any argument for it – especially as, as I said, the pre-weaning mortality in a well-run pastured system is also relatively low. You will always lose some piglets – not in every litter, but across the herd over time – but there is no argument, we think, for confining sows like that as a measure. We think the whole production model needs to change.⁴⁵

Dr Paul Hemsworth told the Committee a recent review of literature found there was no great difference in the aversive responses of sows in crates or pens.⁴⁶ He said:

when you put sows into farrowing crates there is an acute stress response. In sows there does not appear to be a difference in the magnitude of the acute stress response as compared to sows going into farrowing pens. There is quite a bit of variability in both systems, but there is no significant difference in the majority of studies that have been done on that acute stress response of sows going into farrowing crates versus farrowing pens.⁴⁷

5.4.3 Alternative farrowing options

Temporary farrowing crate systems

Temporary farrowing crates usually confine sows immediately before and during farrowing, and for the first three to four days after farrowing. Sows are confined during these specific periods because they are the highest risk periods for piglet mortality due to the sow accidentally crushing piglets while moving around or lying down.

After the high-risk period, the temporary farrowing crate can be opened to provide sows more freedom to move and interact with piglets for the remainder of the lactation period until the piglets are weaned.

According to RSPCA Victoria, although temporary farrowing crates are an improvement from conventional farrowing crates, sows are still confined during the critical periods where they are most motivated to perform nesting and maternal behaviours. Modifying the ability to express nesting behaviour may also impact subsequent maternal behaviour and piglet survival.⁴⁸

Free-farrowing pens

Sows may be confined to a pen indoors but are not physically restricted at any point before and during farrowing and the lactation period. In free-farrowing pens, sows can turn around and move more freely, as well as interact with piglets.⁴⁹

⁴⁵ Tammi Jonas, *Transcript of evidence*, p. 63.

⁴⁶ Professor Paul Hemsworth, *Transcript of evidence*, p. 55.

⁴⁷ *Ibid.*

⁴⁸ RSPCA Victoria, *Submission 1358*, p. 20.

⁴⁹ *Ibid.*, p. 20.

Of both temporary crates and free-farrowing pens, the Australian Veterinary Association suggested that the alternative farrowing systems have been designed to minimise or eliminate the amount of time that sows are confined, while including features to protect piglets from being laid on by the sow. However, they still generally result in a higher piglet mortality rate than traditional farrowing crates.⁵⁰

Outdoor production systems

These systems typically use farrowing huts located in outdoor paddock areas. Farrowing huts are enclosed structures typically with straw bedding that provide sows enough room to turn and walk around easily. In some cases, farrowing huts have guards around the front of the hut that sows can step over to get outside but keep the piglets restricted to the hut for the first few days or weeks of life.⁵¹

Martin Clark, a free range pig producer, told the Committee that his farrowing huts are roughly eight foot by eight foot, and three foot high. He said place straw in the hut and the sow will make a nest to farrow.⁵²

He said his pigs are bred free range, ‘they are out in the mud. At around 21 days, piglets are put into a straw-based ecoshelter where they are fed and looked after. When they get to about 10 weeks of age they are taken up to a bigger property where they have got more space.’⁵³

The Australian Veterinary Association did note, however:

As the sow has more freedom of movement in farrowing huts, they result in an increased mortality rate of piglets (due to crushing or overlaying by the sow) as well as an increased risk of staff injury.⁵⁴

According to RSPCA Victoria’s submission, some of the benefits of outdoor systems include:⁵⁵

- shorter and easier farrowing for sows;
- lower stress levels in sows;
- reduced teat and skin lesions on sows;
- increased expression of maternal behaviours from sows;
- lower stress levels and aggressive behaviours in piglets during weaning

The submission suggested that the negative welfare consequences for sows associated with the severe restriction of movement in conventional farrowing crates are inherent.

⁵⁰ Australian Veterinary Association, *Submission 860*, p. 7.

⁵¹ RSPCA Victoria, *Submission 1358*, p. 20.

⁵² Martin Clark, Murnong Farming, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 55.

⁵³ *Ibid.*, p. 55.

⁵⁴ Australian Veterinary Association, *Submission 860*, p. 7.

⁵⁵ RSPCA Victoria, *Submission 1358*, pp. 20–21.

Alternative farrowing systems that provide sows more freedom to move, where managed appropriately, can provide balanced welfare outcomes to both sows and piglets.⁵⁶

In addition to being confined, sows in indoor systems are typically not provided any nesting material to perform innate and highly motivated nest building behaviours prior to farrowing. As stated by RSPCA Victoria, providing sows with nesting material allows them to fulfil their behavioural needs of nest building before farrowing and can be beneficial for both sow and piglet welfare and performance.⁵⁷

SunPork told the Committee it had removed the use of mating stalls in Victoria and was looking to do the same with farrowing.

We have now proactively removed all mating stalls in Victoria and are working to remove them from our business so there is no period of confinement. We have invested millions of dollars researching alternatives to farrowing crates that confer the same benefits for piglets while allowing more freedom of movement for sows, noting that for SunPork alone it would take us more than \$100 million in 10 years to convert our farrowing systems if we started today. It is also worth noting that when we remove farrowing crates we increase the incidence of piglet overlays, which increases piglet suffering and the number of pigs that require euthanasia, usually via blunt force trauma.⁵⁸

Western Plains Pork, a free range pig producer, said it continued to trial new farrowing options. In a public hearing, Judy Croagh told the Committee that they had been trialling different farrowing huts purchased from the UK, gathering information through farrowing production data and data loggers to understand if there are better ways or if these are a better fit for their pigs. She said

We are trialling a single-farrowing paddock for our gilts. She can still interact with her neighbours, but we are working with the gilt to help her be the best possible mum she can be. We are always, always trying to improve our practices. We work with nutritionists. We work with our environmental planner. We are always developing. There is a whole community supporting what we do.⁵⁹

Animal welfare groups seeking bans on farrowing crates have argued that pigs must be provided with sufficient space to allow them 'to move freely and perform highly motivated behaviours (e.g. foraging and exploring)'.⁶⁰ As stated earlier, RSPCA Victoria has identified close confinement, including the use of sow stalls, farrowing crates and boar stalls, as one of the three key animal welfare issues in pig farming.⁶¹

⁵⁶ Ibid., p. 21.

⁵⁷ Ibid.

⁵⁸ Dr Robert van Barneveld, Chief Executive Officer, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 38.

⁵⁹ Judy Croagh, Chief Executive Officer, Western Plains Pork, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 50.

⁶⁰ RSPCA Victoria, *Submission 1358*, p. 4.

⁶¹ Ibid., p. 6.

It is worth noting that several European countries already prohibit the use of conventional farrowing crates, and the European Union has committed to phasing out their use by 2027. The New Zealand Government has also committed to phase out the use of conventional farrowing crates by 2025.⁶²

FINDING 12: The close confinement and isolation of sows within farrowing crates leads to stress, discomfort, poor muscle development and prohibits maternalistic behaviours.

FINDING 13: Evidence presented to the Committee indicates that mortality rates in piglets that are confined to farrowing crates are similar compared to those that are pasture raised.

RECOMMENDATION 11: That the Victorian Government support farmers to transition to outdoor group housing.

RECOMMENDATION 12: That the Victorian Government legislate a complete ban on the use of farrowing crates.

5.5 Boar stalls

A mature boar is an uncastrated male over nine months of age. Once a boar reaches maturity they may be kept at a 'Boar Stud' where their semen is collected and processed to be used in artificial insemination programs. Mature boars are also kept in the mating area of the farm to be utilised as 'teaser' boars to detect sows who are on heat (in oestrus) or for natural mating.

Australian Pork Limited told the Committee that housing systems that provide boars with more freedom of movement than conventional stalls are encouraged, provided that such systems are consistent with management of boar hygiene and operator health and safety requirements. Further, it recommends aggressive adult boars are housed individually to prevent bullying and injury to themselves or their pen mates from fighting. It is noted that boars raised together are less likely to fight and for this reason often boars will be housed in compatible pairs or small groups.⁶³

The minimum space requirement for a boar stall in the Standards is 0.7 m x 2.4 m. Boars are still legally allowed to be held in stalls for their entire adult life where they are unable to move around freely or turn around. The Standards only require boars to be let out of their stalls twice a week for exercise (not including any mating sessions), which typically involves a short walk up and down the shed.

⁶² Ibid., p. 19.

⁶³ Australian Pork Limited, *Submission 543*, p. 42.

Where boar stalls are not used in indoor production systems, boars are housed in individual pens where they are able to move and walk around freely. The minimum space requirement for an individual boar pen in the Standards is 6 m² of living space. In outdoor production systems boars are usually housed in small paddocks as individuals or in pairs.

In its submission, RSPCA Victoria suggested that there is quite limited scientific evidence available on boars in commercial production systems. However, it is likely that confining a boar in such a small space for its entire adult life is very likely to have the same welfare implications as confining a sow.⁶⁴

RSPCA Victoria added that research indicates boars confined in stalls, which severely restrict movement and certain behaviours, developed lower bone mineral density and have associated lameness. Somewhat ironically, given their role in pork production, research has also indicated that boars confined in stalls can have reduced fertility.⁶⁵

The Australian Veterinary Association noted that the type of accommodation used for keeping boars on farms also needs to consider staff safety. It told the Committee that while a boar stall is slightly larger than sow stalls, the animals still cannot turn around:

Where housed in stalls, the 2008 MCOP standards require that boars must be released at least twice per week for use or exercise. Many farms house boars in individual or small group pens where they have more freedom to move and walk around. Often boars kept for sow/gilt stimulation and heat detection walk around sheds.⁶⁶

The Australian Veterinary Association encourages a move away from boar stalls in indoor systems where boars are confined and behaviourally restricted, towards individual pens with adequate space allowances for boars to move and walk around freely. This conversion of boar studs would require additional industry investment and an appropriate phase-in period.⁶⁷

It should be noted that SunPork is phasing out mating and boar stalls from all farms and has invested millions of dollars into research into alternative farrowing systems since 2015.⁶⁸ This move was supported by representatives of the Australian Veterinary Association, with Dr Yvette Pollard telling the Committee in a public hearing that:

we encourage moving away from boar stalls towards pens. While this is unlikely to create problems for individual farms due to the small number for boars housed there, this will create significant investment and a phase-in period for boar studs.⁶⁹

⁶⁴ RSPCA Victoria, *Submission 1358*, p. 22.

⁶⁵ *Ibid.*, pp. 22–23.

⁶⁶ Australian Veterinary Association, *Submission 860*, p. 7.

⁶⁷ *Ibid.*, p. 8.

⁶⁸ SunPork Group, *Submission 470*, p. 2.

⁶⁹ Dr Yvette Pollock, Australian Veterinary Association, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 25.

In the Committee's view, all forms of severe constraint of movement and natural behaviours represents a breach of animal welfare principles and would not be supported by the Victorian community.

RECOMMENDATION 13: That the Victorian Government mandate a complete ban on the use of boar crates, mating stalls and any other restrictive confinement.

5.6 Outdoor housing alternatives

5.6.1 Free range

While larger pork producers tend to use indoor accommodation for pigs, there are a number of smaller and intermediate producers who take a different approach. The Committee heard from some pork producers in Victoria who operate largely on a free range basis, do not use sow stalls and whose approach appears to be significantly more welfare focused.

As with many of the issues raised during this Inquiry, proponents from the pork industry sector and the animal welfare sector, have expressed a variety of views.

Dr Kate Savage, a veterinarian who works within the pork industry, suggested that there are pros and cons of free range farming. She told the Committee that factors such as the availability of land and proximity to other people, the soil type and the climate will be factors in whether or not free-range farming is viable. She told the Committee that there have been recent attempts in Victoria for producers to open free range farms but they have been postponed or delayed at the council level.⁷⁰

Dr Savage also suggested that from a veterinary perspective, free range production may make biosecurity more challenging:

In a free range setting you've got the pigs, the straw, their bedding, there wallows, their feed and their water all sort of exposed to wild birds. Birds can carry things like avian influenza. They can carry salmonella. We have just got that risk that we cannot quite control like we would indoors. Also, it is harder to control the rodents, and they carry swine dysentery. There is a biosecurity risk that comes with that type of production.⁷¹

Martin Clark told the Committee of other risks in running a free range model, particularly predators:

We have other risks, like feral animals, foxes. It is nothing more than you turn up in the morning and you have got an agitated sow that has given birth and there are only six piglets, and you wonder where the other five have gone, and there is a mother fox

⁷⁰ Dr Kate Savage, Australian Veterinary Association, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 33.

⁷¹ Ibid.

teaching her kits how to grab them as they are born. Then you find the carcasses laying in a gutter with just a mouthful out of them.⁷²

A contrary view was put to the Committee by Tammi Jonas, a smaller scale pork producer from Central Victoria. Ms Jonas said that many of the issues inherent in large scale factory pig farming do not arise in a pastured pig farm. Ms Jonas told the Committee that questions of enrichment and confinement are not ones that they have to deal with on the pastured pig farm. She told the Committee that:

I think that in a healthy environment with a lot of ground cover – we have a lot of grass and we have shrubbery and we have trees and we have quite a lot of different species in our environment, and so unlike a monoculture it does not suffer the vulnerabilities that a monoculture does. We do not encounter a lot of disease in our system at all, whether it is passed from other species or other things coming in. It is just a much more resilient system. And again, there is a huge body of work on agroecology globally, which is what we are oriented towards, and those are much healthier production environments.⁷³

5.7 International comparisons

Throughout this Inquiry, submitters and witnesses have raised examples of different approaches being taken in other countries. Welfare groups have discussed different approaches in Scandinavian countries, some European jurisdictions and New Zealand, where things that are permitted in Australia, such as CO2 gassing and sow stalls, have been banned or are being phased out.

A number of industry representatives, however, emphasised that it is impossible to make direct comparisons between Australia and other jurisdictions due to different climatic and geographical differences.

For example, Dr Kate Savage, a veterinarian, stressed that it is not possible to necessarily translate findings from overseas as things like building design, free range production and transport are going to be quite different. She told the Committee in a public hearing that:

We cannot just sort of use the same farrowing hut design that they would have in the UK. They are trying to keep their sows warm; free range we want to try to keep ourselves cool. Transport as well, so things like truck design. We cannot sort of just import Canadian trucks that have a great welfare design, because again they are trying to do the opposite of what we are trying to do with cooling versus warming. So a lot of the climactic concern comes around accommodation, transport, that sort of thing.⁷⁴

⁷² Martin Clark, *Transcript of evidence*, p. 53.

⁷³ Tammi Jonas, *Transcript of evidence*, p. 65.

⁷⁴ Dr Kate Savage, *Transcript of evidence*, p. 34.

Similarly, Dr John Pluske, Chief Executive Officer and Chief Scientist of the Australasian Pork Research Institute Ltd (APRIL), told the Committee:

One of the most obvious differences is the design and construction of the buildings. If you are farming pigs in Finland or Sweden, the temperatures are quite a bit different than they are in central Victoria or other parts of Australia, therefore the ventilation systems and the flooring systems lend themselves to suit the climatic conditions of the environment hence there are differences in building design and differences in climatic control.⁷⁵

Dr Pluske also suggested that another key difference relates to regulations. He again cited Finland and Sweden as an example, where pigs are prescribed to have more space and that they must have enrichment in the form of straw, which is not directly applicable to Australian conditions. He said:

We are exploring aspects of enrichment in a project that is aligned to the tail-biting project, but as many producers can attest, the use of straw under Australian conditions is not as simple and easy as it sounds due to potential issues with effluent management.⁷⁶

Dr Pluske suggested rather than comparing ourselves with other jurisdictions, the focus needs to be on ‘conducting the science, looking at appropriate scientific rigour and scientific process and then exploring the results’.⁷⁷

Dr Tony Peacock, the Chair of APRIL, told the Committee that Australia is a ‘closed herd’ which does not import pig genetics. ‘That is quite different to other countries, and the genetics will really interact with the environment.’⁷⁸

The Committee has not conducted a detailed review of all animal welfare practices with relation to the Victorian pork industry in comparison with other jurisdictions. It has relied on submissions and evidence given at the public hearings to overview where Australia sits within the national and international community with regards to animal welfare in the pork industry.

The Committee accepts the view put by the pork industry that direct comparisons between Australia and other jurisdictions are not necessarily applicable and should be approached with some caution.

However, despite climatic and geographical differences, Australia operates within a larger international context and it is important that it meets the highest contemporary international standards of animal welfare. In the Committee’s view, it is not sufficient to simply say ‘we are different and therefore we can do whatever suits us’.

75 Dr John Pluske, Chief Executive Officer and Chief Scientist, Australasian Pork Research Institute Ltd., *Transcript of evidence*, p. 44.

76 Ibid.

77 Ibid.

78 Dr Tony Peacock, *Transcript of evidence*, p. 44.

It is important that there is a detailed understanding of international norms and current trends. In the Committee's view, Australia should be at the leading edge of animal welfare in agriculture generally and within the pork industry, in particular.

The Victorian pork industry should in the first instance be established within an Australian context. In the Committee's view, there needs to be an Australia-wide framework established for animal welfare in agriculture. Such a framework should be based on international comparisons, analysis of climatic and geographical differences and public expectations. Without this national approach, it may become too easy for producers to move to jurisdictions with lower standards.

RECOMMENDATION 14: That the Victorian Government support a national standards framework including enforceable welfare guidelines.

Chapter 6

Other welfare issues

In the preceding chapters, the Committee has focused on the key welfare concerns of CO2 gassing prior to slaughter and the confinement of sows. However, a number of other welfare issues have been raised during the course of the Inquiry. These include the docking of the tails, clipping of teeth and castration of piglets without anaesthetic, as well as killing of piglets through the use of blunt force trauma.

Again, as with the other welfare issue covered in this report, opinions differ regarding the level of cruelty inherent in these activities. In the case of tail docking and teeth clipping, there is also some disagreement about whether the procedures are even necessary.

In this chapter, the Committee will examine what the husbandry procedures are, why they are undertaken and any issues that arise from them in terms of pig welfare.

6.1 Tail docking and teeth clipping

While tail docking and teeth clipping are clearly different procedures, the issues around them are the same, namely whether they are necessary and routinely done, and whether they are administered without anaesthetic. Therefore, in this section they have been treated largely as one procedure, and most of the commentary uses tail docking as the example. The issues apply equally to both and can also include castration of piglets.

According to RSPCA Victoria, tail biting is an abnormal behaviour where pigs will bite and chew on other pigs' tails, which can lead to pain, injuries, infections, and significant production losses. The causes of tail biting are complex and multifactorial but it has been linked to increased stress and barren environments where pigs are unable to satisfy their behavioural needs.¹

Dr Paul Hemsworth from the Animal Welfare Science Centre, University of Melbourne, said during a public hearing:

The fact that we see tail biting in complex environments, like environments where enrichment is provided – you cannot explain tail biting based on boredom in that situation. Outdoor pig production – that is probably not a boring environment for the pig, and indoor systems are not necessarily a boring environment either. I mean, the environment changes regularly, with people coming and going. People are an important part of the environment. Pigs are very aware of people in their environment. Change is

¹ RSPCA Victoria, *Submission 1358*, p. 32.

occurring all the time; the animals are moving and moving from pen to pen. They are being mixed at times. They are having litters.²

The key remedial action taken to stop tail biting is tail docking. Tail docking of piglets involves cutting the end section of the tail with sharp scissors or a scalpel. RSPCA Victoria's submission stated that pigs having shorter tails can help prevent tail biting from occurring in some groups of pigs. After tail docking, piglets show clear signs of pain and distress, including attempting to escape and struggle, squeal, tail wag and clamp their tails between their hind legs.³

One of the key concerns raised during the Inquiry was that tail docking is routinely done in Australia without analgesia.

Throughout the Inquiry, concerns have been raised by a large number of individual submitters about the practice on the basis that it was both unnecessary and that it caused the animals pain and distress.⁴

Victorian welfare standards discourage but do not prohibit:

- the castration of males without anaesthetic if piglets are less than 21 days old
- tail docking and nose ringing
- trimming of teeth and tusks.⁵

This issue was also raised by a number of organisations in both submissions and during public hearings.

Animals Australia, in its submission, suggested that tail docking was of concern as far back as 1965, when the 'Brambell Report' raised concerns about intensive pig production including close confinement of sows, tail docking, and high stocking densities. They added:

These concerns are as true today as they were then. In 2023, pigs are not even being treated in a way that is consistent with recommendations made in 1965, let alone in line with twenty-first century animal welfare science and community expectations.⁶

Harley McDonald-Eckersall of the Farm Transparency Project told the Committee that not only were procedures undertaken without anaesthetic, but they were undertaken by people without the necessary training or qualifications to do it safely:

In these crates newborn piglets are subjected to a series of painful surgical mutilations without any kind of anaesthetic or pain relief. Their tails are cut with scissors, their teeth

² Professor Paul Hemsworth, Animal Welfare Science Centre, University of Melbourne, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 58.

³ RSPCA Victoria, *Submission 1358*, p. 32.

⁴ For example, see submissions 480, 192, 707, 1773, 1449, 1614, 1761, 1372, 1357, 196, 114, 1326, 1382, 405 and others all suggested that the practice was cruel and that if it was to be done should be done with pain relief.

⁵ Victorian Parliamentary Budget Office, *Submission 432*, p. 19.

⁶ Animals Australia, *Submission 232*, p. 2.

are cut back and chunks are cut out of their ears as a method of identification. These unnecessary procedures are performed not by qualified veterinarians but by untrained farmhands.⁷

The pork industry representatives, on the other hand, gave evidence that their staff were actually very well trained. Dr Robert Barneveld of SunPork told the Committee that:

We are committed to training our employees. We run the largest pig industry registered training organisation in Australia, covering certificate III in pig production and meat processing, and last year more than 1210 training units were completed within this framework within our business⁸

The Committee heard further evidence that there is also substantial distress caused to pigs in being handled by humans and that the administering of anaesthetic would require double handling which is likely to increase the distress to the animal. In a public hearing, the Committee was told by Dr Kate Plush, the Science Technology and Adoption Manager for SunPork Group, that the pigs:

are not used to minute interactions with humans in the same way that dogs and cats are. Picking up a baby pig away from its mother and administering an injection, putting it back and coming back 30 minutes later, picking up the pig again and cutting off its tail – those pigs actually show a higher stress response to the handling⁹

However, industry representatives indicated that they were not opposed to different approaches. Dr Rebecca Morrison of JBS Australia Foods/Riverlea told the Committee:

we are committed to continuous improvement in this space and investigating pain relief where it is effective, it does not cause additional stress and it is also safe for our people to use as well, which is really important.¹⁰

There were also different approaches within the pig industry. Some of the pig producers who appeared before the Committee suggested that they did engage in the practices as required, while other said it was not necessary and they did not do it.

Tim Kingma, a farmer who appeared before the Committee, told the Committee that on his farm they do tail dock, and that it was done for the benefit of the pig. He said in a public hearing that:

We do it in the first 24 hours, and talking about it over time, we now use an antiseptic spray that also helps with infection and helps with numbing and all that. So we have evolved that process over time, and no doubt if I sit here and talk to you in 10 years it

7 Harley McDonald-Eckersall, Strategy and Campaigns Director, Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, p. 12.

8 Dr Robert van Barneveld, Chief Executive Officer, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 38.

9 Dr Kate Plush, Science Technology and Adoption Manager, SunPork Group, public hearing, Melbourne, 13 March 2024, *Transcript of Evidence*, p. 42.

10 Dr Rebecca Morrison, Research, Innovation and Animal Welfare Manager, JBS Australia Foods/Rivalea, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 43.

will have changed again. But we are still going to have to dock the tails because the impact if you do not, later on, on an animal is very severe. It is animal welfare; we do it for that reason.¹¹

He said the reason for needing to do it was tail bite:

Pigs are very inquisitive and once they start, you might just get an animal that eats the tail back. All industries deal with some side effects, and with the systems we use and with consultation with a vet, we dock the tail very quickly.¹²

One of the larger pork producers who contributed to the Inquiry, SunPork, also told the Committee that they 'tail dock under veterinary direction, and we are leading a \$7 million research project into alternatives to tail docking'.¹³

The Committee received evidence that the practices of tail docking and teeth clipping are subject of further research. Trevor Pisciotta, Executive Director, Animal Welfare Victoria and Agricultural Regulatory Policy for Agriculture Victoria told the Committee that there are non-mandatory guidelines in relation to teeth clipping and tail docking that encourage that they only be used in circumstances where there is demonstrated need for their use – tail docking to avoid tail biting, and teeth clipping to avoid piglet-on-piglet injury as well as injury to nursing mothers. He told the Committee that it was not clear how prevalent the practices currently are:

I am aware that there has been some work done by industry; particularly I am aware of some work around looking at other animal management practices that would remove the need for tail docking routinely. I could not speculate on the relative use now of those procedures versus in the past¹⁴

Dr John Pluske, Chief Executive Officer and Chief Scientist of the Australasian Pork Research Institute Ltd (APRIL), told the Committee that APRIL is a partner exploring the aetiology of tail biting on a project that was part funded by the Australian government, and that is supported through the CRCP scheme. He said that:

Tail biting, as we have heard, is a very complex problem caused by many different factors. In its commentary in 2014 the European Food Safety Authority stated, 'It is, however, important to remember that due to the multifactorial nature of tail biting, measures need to be tailored to local conditions, taking into account, for example, climate, pig breed and building practices.'

The practice of routinely performing these surgical procedures is not universally supported within the industry. Ms Tammi Jonas, a small scale farmer in Central Victoria, told the Committee that in her view, the reasons for tail biting, which is the justification

¹¹ Tim Kingma, public hearing, Melbourne, 13 March 2024, *Transcript of evidence*, p. 33.

¹² *Ibid.*, p. 33.

¹³ Dr Robert Barneveld, *Transcript of evidence*, p. 38.

¹⁴ Trevor Pisciotta, Executive Director, Animal Welfare Victoria and Agricultural Regulatory Policy, Agriculture Victoria, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 9.

for the procedures, is the way the animals are housed which cause the distress that leads to the behaviour:

I actually would also argue that the tooth clipping and the tail docking should not be required. In a healthy production environment there is no need to be doing those things. We have heard of students being taught in some of the veterinary courses – we have had vet students here, and I will not say what universities – that pigs, even in outdoor systems, must have their teeth clipped and their tails docked, and we do not know a single pasture grower who has ever done those things. We never have incidences of tail biting. So when they talk about it being multifactorial and that they have no idea why tail-biting outbreaks happen, we are like, ‘It’s because they’re confined in sheds; there are too many animals too close together who are bored and stressed’.¹⁵

Despite some pork producers eschewing the practices, it was the view of RSPCA Victoria that tail docking and teeth clipping remain routine within the industry. In a public hearing, Ms Rebecca Cook, Head of Prevention at RSPCA Victoria, told the Committee that there were ‘several invasive and painful husbandry procedures that are performed routinely on piglets, which include castration, tail docking and teeth clipping’. She said:

Following these painful procedures, piglets show signs consistent with pain and distress. In Australia piglets do not have to be provided with any form of best practice pain relief for routine painful husbandry procedures. We believe that where painful procedures continue, pain relief should be mandated.¹⁶

RSPCA Victoria did indicate that there are moves to address these concerns. In a response to a question taken on notice during their public hearing, RSPCA Victoria told the Committee that while tail docking is still routinely performed to mitigate against the risk of tail biting and pain relief is not used, evidence suggests mixed results as to whether topical anaesthetics with or without NSAIDs provide effective pain relief for piglets undergoing tail docking. RSPCA Victoria did acknowledge that the Australian pig industry is undertaking research on alternatives to tail docking.

It is RSPCA Victoria’s view that ultimately the best solution is the elimination of the practice of tail docking. It told the Committee that:

while continued research efforts for effective pain relief options are important, efforts should also be made to identify suitable alternatives to phase out the need for routine tail docking in Australia.¹⁷

The Committee understands that there are differing views on the need for these procedures and that they are the subject of on-going research. However, it is not simply the necessity of the procedures that are of concern. The performing of surgical procedures without any form of pain relief, regardless of the reasons for the

¹⁵ Tammi Jonas, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 63.

¹⁶ Rebecca Cook, Head of Prevention, RSPCA Victoria, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 14.

¹⁷ RSPCA Victoria, Inquiry into pig welfare in Victoria hearings, responses to questions on notice received 15 April 2024, p. 3.

procedures, appears to cause understandable distress and unnecessary suffering on the animals.

Tail docking, teeth clipping, and ear notching are highly injurious and painful procedures that are commonly performed without the use of pain relief. The Victorian Government should mandate pain relief for routine surgical procedures such as teeth clipping, tail docking and ear notching.

6.2 Blunt force trauma

Another issue that has been raised in many submissions and by witnesses throughout the Inquiry is the practice of killing sick or otherwise compromised piglets, such as the runt of a litter, by use of blunt force trauma. Video aired in the media showed a worker holding a piglet by the hind legs and killing it by smashing its head against the concrete floor. This elicited a strong response from submitters to the Inquiry.

A very large number of submissions, particularly individual submissions, identified blunt force trauma on piglets as of significant concern.¹⁸

In its submission, Animals Australia called for the prohibition of the ‘the routine inhumane killing of piglets by smashing them against a hard surface’.¹⁹ Animals Australia suggested it would not be acceptable to kill babies in this way or any other species. It said:

This method [blunt force trauma] should not be promoted over more reliable and repeatable cull methods such as captive bolt...there is a significant potential for animal harm associated with inappropriate practice, lack of accuracy, issues with repeatability and operator fatigue.²⁰

In its submission to the Inquiry, Sentient, which is an independent veterinary animal welfare advocacy association, said the Code and the Victorian Standards and Guidelines which allowed the euthanasia of sick or injured piglets under three weeks of age by blunt trauma to the head (such as by a hammer), ‘is currently being interpreted by the industry as a sanction to smash the heads of conscious piglets against a hard surface’.²¹

Dr Barneveld of SunPork suggested in evidence that the use of blunt force trauma was ‘the quickest and most effective way of completing that task’, adding:

No-one enjoys the task. If there was a more effective evidence-based option, we would look to employ that.²²

¹⁸ See, for example, Anne Shackman, *Submission 1604*; Christine Peek, *Submission 677*; Emily Bakker, *Submission 1824*; Glenn James, *Submission 484*; Joe Erftemeyer, *Submission 680*; Franklin Hynes, *Submission 1569*; Martin Derby, *Submission 361*.

¹⁹ Animals Australia, *Submission 232*, p. 30.

²⁰ Animals Australia, *Submission 232*, quoting Dalla Costa, F.A. et al (2020) Evaluation of physical euthanasia for neonatal piglets on-farm, *Journal of Animal Science* 98(7), p. 30.

²¹ Sentient The Veterinary Institute for Animal Ethics, *Submission 2028*, pp. 3–4.

²² Dr Robert Barneveld, *Transcript of evidence*, p. 38.

Tim Kingma, a pork producer, agreed that the method was quick and effective, is over immediately and was therefore more humane than alternatives. He told the Committee that blunt force trauma is an approved way of euthanising a piglet. He said:

I would slightly turn it around – it is actually animal welfare, and it is actually showing that we care. It is instantaneous, and it is after we have given these piglets – we have tried. ... sometimes there is death, and that is never pleasant for people and especially people that do not believe in eating meat. I believe it is a tool that is very efficient, very quick, and it is over straightaway – immediately.²³

Another pork producer, Martin Clark, told the Committee that the effectiveness of the process ‘comes down to the person that is administering it and where it is and the size of the piglet’.²⁴

While the Committee accepts the sincerity of the pork producers who suggest that blunt force trauma is the quickest and most effective (and thus most humane) ways to euthanise piglets who are either too sick or too small to be viable, it considers there are too many factors that can affect the outcome, such as the skill of the person undertaking the task, the practices adopted within an individual facility or worker fatigue. It is also a traumatising activity for the person conducting the task that over time could lead to substantial mental stress, whether recognised or not.

In the Committee’s view the practice is not acceptable in today’s animal welfare environment and should be discontinued. Where euthanasia is necessary, it should be carried out under veterinarian supervision with appropriate veterinary tools.

RECOMMENDATION 15: That the Victorian Government work with industry to find an alternative to the use of blunt force trauma as a suitable method of piglet euthanasia.

6.3 Enrichment opportunities

An issue that was a recurring theme throughout the Inquiry was the importance of providing pigs with enrichment opportunities, which means providing them with the opportunities to carry out all of their natural behaviours to maintain not only their physical health but their mental wellbeing.

The Committee heard many times during the Inquiry that pigs are highly intelligent and denying them the chance to move around, forage, socialise and nesting is an act of cruelty that substantially reduces their quality of life.

In its submission, RSPCA Victoria said:

Consideration of both the mental and physical state of an animal is a way to evaluate the welfare of an animal or group of animals in a particular situation, with a strong

²³ Tim Kingma, *Transcript of evidence*, p. 29.

²⁴ Martin Clark, *Transcript of evidence*, p. 55.

focus on mental wellbeing and positive experiences. Pigs are intelligent, sociable, and inquisitive animals who have complex needs that should be met by their environment on farm.²⁵

According to RSPCA Victoria, issues previously discussed in this chapter, such as tail biting, can be mitigated by the provision of enrichment activities. In its submission, it suggested that 'where tail biting is a problem, all areas of the environment, feeding and management should be investigated to identify contributing factors so that remedial action can be taken, e.g., provision of enrichment to reduce tail biting behaviour'.²⁶

There were a large number of submissions that expressed concern that current practices within the pork industry were detrimental to pigs' mental well-being due to the denial of enrichment activities.²⁷

The Australian Veterinary Association stated in its submission:

There is the need for more of a planned, proactive and science-based approach through the development of meaningful enrichment plans in consultation with industry veterinarians.²⁸

In public hearings, enrichment activities were raised by a number of witnesses. Rebecca Cook of RSPCA Victoria told the Committee that extreme confinement is not simply an issue of physical harm but causes distress mentally:

While the quantity of space is important, so is providing enrichment opportunities. As discussed in our submission, pigs are curious social animals, so allowing them to forage, build nests and explore is vital for good welfare. For example, prior to farrowing sows often want to build a nest for their piglets. Providing straw or hessian sacks for them to undertake this activity has been found to improve sow and piglet welfare.²⁹

Dr Yvette Pollock of the Australian Veterinary Association also discussed the importance of developing enrichment plans. She said:

We support environmental enrichment for all pigs. As this area of research is continuously evolving, it would be better not to prescribe detailed requirements in legislation. Instead an outcomes-based approach would be preferable, and it would be most effective for vets to work with their farms to create and implement enrichment plans which are meaningful for the pigs at that farm.³⁰

²⁵ RSPCA Victoria, *Submission 1358*, p. 7.

²⁶ Ibid.

²⁷ See, for example, Sue Viewing, *Submission 1350*; Hayley Ablott, *Submission 328*; Morgan Watkins, *Submission 480*; Vanessa Sarre, *Submission 740*; Kirsty Watkins, *Submission 499*; George Nishihama-Koch, *Submission 855*; Nick Andrews, *Submission 1374*; Natasha Slavec, *Submission 473*.

²⁸ Australian Veterinary Association, *Submission 860*, p. 5.

²⁹ Rebecca Cook, *Transcript of evidence*, p. 14.

³⁰ Dr Yvette Pollock, Australian Veterinary Association, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 25.

Representatives of the pig industry also acknowledge the importance of enrichment activities for pigs. In its submission, JBS told the Committee that it had invested heavily in collaborative welfare R&D, particularly in the areas of:

reducing confinement, reducing pain of husbandry procedures, developing best practise guidelines for CO2 stunning, developing enrichment programmes for pigs, and more recently investigating the elimination of pigtail removal, developing smart technologies that are able to monitor the health and welfare of pigs and novel vaccines to improve herd health and welfare.³¹

In pig farms that employed free range or pastured practices, the need for enrichment appears to be less necessary. Ms Tammi Jonas told the Committee that ‘enrichment is pretty inherent in an ecosystem like a pastured pig farm, so there is no need for toys or buying bowls or things’. She added:

The nesting instincts of sows are easily met when they have access to straw in a pasture that they then actually bring into their little farrowing – it is a shed, like a Quonset hut if you like. They gather that and make a nest themselves³²

The evidence heard by the Committee during the Inquiry strongly suggests that not only is enrichment important for intelligent animals such as pigs in order to maintain their mental wellbeing, it is essential to limit aversive behaviour such as tail biting. All witnesses and submissions that addressed the issue acknowledged the role that lack of enrichment played in such behaviours.

It is therefore essential that genuine pig welfare requires that all pig farming facilities provides forms of enrichment appropriate for the animals they keep.

- The provision of enrichment in intensive systems reduces the frequency of tail biting and other aversive behaviour.
- Pasture raised pigs raised in lower stocking densities experience natural enrichment and lower levels of boredom leading to fewer instances of litter mate aggression including tail biting.

RECOMMENDATION 16: That the Victorian Government mandate straw bedding substrate to stimulate natural pig behaviours to prevent injury and abrasion.

RECOMMENDATION 17: That the Victorian Government investigate enrichment aids for farmed pigs for inclusion in the Animal Care and Protection Bill.

³¹ JBS Australia, *Submission 142*, p. 6.

³² Tammi Jonas, *Transcript of evidence*, p. 61.

6.4 Antibiotic use within the industry

Another issue that has been raised by a number of contributors to the Inquiry is the perceived over-use of antibiotics within the pork industry, including prophylactically as a way of preventing disease.

A major study undertaken by researchers from the University of Canberra and the University of Wollongong has found that antimicrobial-resistant (AMR) bacteria are frequently isolated from retail meat and may infect humans. The study, undertaken in 2021, found that there is ‘a greater diversity of AMR genes in bacteria isolated from retail meat in Australia than previous studies have shown’.³³ This indicates that antibiotics are routinely used in meat production as a preventative measure. The study concluded that it emphasised the importance of monitoring AMR in not only foodborne pathogenic bacteria, but other species that are capable of transferring AMR genes to pathogenic bacteria.³⁴

Dr Claire O’Brien, one of the researchers who undertook the study, told the Committee:

Hygiene is a big issue in those indoor environments where animals cannot move around, and obviously that is mitigated by the use of antibiotics in a lot of those systems.³⁵

Dr O’Brien added:

you do get resistance developing towards common detergents and antiseptics by the bacteria in those spaces as well. Lack of space is an issue. We know that even stress that the animals encounter can have a huge impact on our microbiome and make your gut leakier. If you have distress, there is higher inflammation; you get endotoxin, which is a product of Gram-negative bacteria, translocating the gut walls, and therefore it is a welfare issue even down to the gut microbiome level. Air quality as well, if you are looking at trying to limit the transmission of viruses – all of my work has been on bacteria – can be an issue indoors. It is just common sense really. I mean, you would not need the antibiotics if they had a hygienic environment where they had room to separate the areas where they defecated from where they lie. There is increased transmission potential because the pigs are in closer proximity. They are touching each other more; they are walking in their own faeces. When they do get infections they need to be treated by more antibiotics et cetera.³⁶

As explained by Dr O’Brien, antibiotics are used to directly kill bacteria and antimicrobials, reducing the multiplicity of bacteria. However, antibiotics also:

ruin the gut microbiome, and this is the same for pigs. They have a very diverse gut microbiome, and the gut microbiome carries out many functions that the body cannot do itself – for example, synthesise vitamins, for example vitamin K, which we need for

³³ Ojas VA Dixit, Mahboobeh Behruznia, Aidan L Preuss and Claire L O’Brien, ‘Diversity of antimicrobial-resistant bacteria isolated from Australian chicken and pork meat’, *Frontiers*, vol. 15, 2024.

³⁴ Ibid.

³⁵ Dr Claire O’Brien, University of Canberra, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 68.

³⁶ Ibid.

blood clotting. It breaks down indigestible fibre in our diet, it modulates our immune system and it protects against pathogenic bacteria.³⁷

In other words, the gut biome for pigs, as it is for humans, is very important in healthy functioning and that the overuse of antibiotics is likely to reduce the overall health of the pig and may make them more susceptible to disease.

Dr O'Brien also said:

We know that a lot of antibiotics are used in the pig industry either prophylactically or in the feeds. It is very hard to get any real data or information in Australia, which is frustrating for an objective researcher such as me just wanting to understand how antimicrobial resistance is being spread within Australia and the extent of it.³⁸

Dr O'Brien told the Committee that she thought it was 'ludicrous to me and backwards that antibiotics are used to treat these animals prophylactically', saying:

We know that they reduce the diversity and evenness of the gut microbiome, which makes it more susceptible to pathogenic bacteria as well.³⁹

In addition to impacting an individual animal, the use of antibiotics has the potential for making its way into the food chain:

Another thing is the gut microbiome is transferred from mother to child or pig to piglet, so the microbiome that is being destroyed by the antibiotics is being passed on to the next generation. All of the chemicals and antibiotics used in production drive antimicrobial resistance, which of course can be spread via mobile genetic elements to other strains and species of bacteria, and they can make their way through the food chain.⁴⁰

One of the key issues outlined by Dr O'Brien is the lack of information about which antibiotics are being used in the industry. She told the Committee:

we cannot put the pieces of the puzzle together. You know, we have found these gene variants that confer antimicrobial resistance to last resort antibiotics, but we cannot determine the extent of it and we cannot make any claims that this is due to antibiotic use because we do not know which antibiotics are being used.⁴¹

She explained that the antimicrobial resistance to an unknown antibiotic may be important. She told the Committee that in the study:

We had an antimicrobial resistance gene for beta-lactamases which provide resistance against antibiotics such as penicillins, for example. So, if penicillins are being used in the pig industry, that could be driving the resistance in those particular bacteria, and so the plasmid is being maintained because of the antimicrobial resistance towards perhaps

³⁷ Ibid., p. 61.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ Ibid., p. 62.

⁴¹ Ibid.

the penicillin – not necessarily that last resort antibiotic, because we know colistin is not being used in the pig industry.⁴²

There is evidence that the use of antibiotics is prevalent in the pork industry. Victoria doesn't record antibiotic usage and hasn't publicly released data on antibiotic use since 2010.

It is logical to assume that high density farming, with large numbers of animals kept in confined spaces, raises the risk of infection and therefore is more likely to see the use of antibiotics as a preventative measure against infection.

Dr O'Brien stressed the issue in relation to indoor housing:

Hygiene is a big issue in those indoor environments where animals cannot move around, and obviously that is mitigated by the use of antibiotics in a lot of those systems. But you do get resistance developing towards common detergents and antiseptics by the bacteria in those spaces as well. Lack of space is an issue. We know that even stress that the animals encounter can have a huge impact on our microbiome and make your gut leakier. If you have distress, there is higher inflammation; you get endotoxin, which is a product of Gram-negative bacteria, translocating the gut walls, and therefore it is a welfare issue even down to the gut microbiome level. Air quality as well, if you are looking at trying to limit the transmission of viruses – all of my work has been on bacteria – can be an issue indoors. It is just common sense really. I mean, you would not need the antibiotics if they had a hygienic environment where they had room to separate the areas where they defecated from where they lie. There is increased transmission potential because the pigs are in closer proximity. They are touching each other more; they are walking in their own faeces. When they do get infections they need to be treated by more antibiotics et cetera.⁴³

The issue of the risks posed by the overuse of antimicrobials was also raised by the Australian Food Sovereignty Alliance (AFSA), which represents over 100 small-scale food producers (including pork producers) who are fighting for social and ecological justice for people, animals and ecosystems. In its submission, the AFSA identified zoonotic diseases emerging from intensive livestock production and the use of antimicrobials and the resultant antimicrobial resistance (AMR) as a growing threat to human and other-than-human health and lives.⁴⁴

The AFSA submission stressed that advantage of small scale agroecological systems selling meat in direct supply chains 'reduces the risks of disease emergence and spread'.⁴⁵ The submission stated that:

Long, complicated supply chains and free trade agreements are contributing to the rapid spread of diseases (such as African Swine Fever and Foot and Mouth Disease)⁴⁶

⁴² Ibid.

⁴³ Ibid., p. 68.

⁴⁴ Australian Food Sovereignty Alliance, *Submission 573*, p 11.

⁴⁵ Ibid.

⁴⁶ Ibid.

Antimicrobial resistance is one of the biggest threats to animal and human health globally. Farm hygiene, air quality and stocking density are all contributing factors to high use of antibiotics to prevent infection.

Representatives of the pig industry did not agree that the industry misused antibiotics. Dr Tony Peacock, Chair of the Australasian Pork Research Institute Ltd, told the Committee that antibiotic use and hormone use has changed substantially within the pork industry. He said in a public hearing:

There are many myths about hormones. There are no added hormones used in the Australian pork industry. Antibiotics are used to treat sick pigs. Just like in human medicine, we make efforts to target the right antibiotics for the right diseases in the right amounts. The livestock industries, in my view, are doing much better in our antibiotic changes than the medical industry is for human health.⁴⁷

Dr Chris Richards, Managing Director, of Apiam Animal Health told the Committee that antibiotic use is a huge focus of all veterinary groups, not just in the livestock sector but in companion animals as well. He told the Committee in a public hearing that:

As a veterinary group we actually invested in a diagnostic lab and vaccine company a few years ago, on the basis that we need to really focus on alternatives to antibiotics as well as monitoring the use of the antibiotics that we do have in play.⁴⁸

Veterinary consultant with Apiam, Dr Kate Savage, told the Committee that the indiscriminate use of antibiotics has ‘gone from the industry’, saying in a public hearing that:

I think from a practising vet point of view – I am out on farm regularly – it is as little as possible and as much as necessary. Of course we are not going to leave pigs untreated, that is not a great welfare outcome either, but it is not going to be thrown in their – many, many years ago different industries used them for growth promotion and things like that; that is just completely gone out of our industry now. Antimicrobial stewardship, as it is called, where it is about responsible usage et cetera, is a large part now of our education as vets.⁴⁹

Dr Barneveld told the Committee that:

We have reduced our antimicrobial use by 76 per cent since 2016. We do not use any high-importance antibiotics under the ASTAG classification, and we have data on every antimicrobial application on any pig on any farm on any day.⁵⁰

⁴⁷ Dr Tony Peacock, Chair, Australian Pork Research Institute Ltd, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 39.

⁴⁸ Dr Chris Richards, Managing Director, Apiam Animal Health, public hearing, Melbourne, 26 March 2024, *Transcript of evidence*, p. 48.

⁴⁹ Dr Kate Savage, *Transcript of evidence*, p. 48.

⁵⁰ Dr Robert Barneveld, *Transcript of evidence*, p. 38.

He said:

We do not use growth promoters or hormones in our systems, so we categorically reject claims that we are contributing to human health issues as a result of antimicrobial resistance or other inputs.⁵¹

The Committee has not undertaken detailed research into this issue as it is a related but peripheral element of the terms of reference which focus on specific elements of pig welfare. However, it considers the issue important and that the use of antibiotics within meat-producing industries needs to be monitored and publicly reported. In the Committee's view, even if the individual farms and producers know what their antibiotic use is and consider it to be appropriate, it is not transparent to the public.

FINDING 14: Biodiverse farm systems and genetic diversity reduce disease spread on pig farms.

RECOMMENDATION 18: That the Victorian Government require industry to implement the regular surveillance monitoring and public reporting of antibiotic use on Victorian farms.

**Adopted by the Legislative Council Economy and Infrastructure Committee
55 St Andrews Place, East Melbourne
5 June 2024**

⁵¹ Ibid.

Appendix A

About the Inquiry

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3	Rachel Murray	25	Anna-Lisa Kelly
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5	Kirsty Budding	28	Sheila Donoghue
6	Sarah Fraser	28.1	Sheila Donoghue
7	Diane Kastel	28.2	Sheila Donoghue
7.1	Diane Kastel	29	Jen McGee
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8	Michelle Setaro	32	Natasha Norris
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16	Gwen Ferry	41	Kim Duton
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19	Kasia Arent	45	Helen Rose
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21	Tristan Lavery	48	Tania Krivushenko
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53	Animal Liberation Scotland	90	Deirdre McGovern
54	Elis Niyazieva	91	Georgia Papanastasiou
55	Margaret Watson	92	Anita Georgiades
56	Mark Oliver	93	John Defina
57	Deb Bowen-Saunders	94	Debra Hyslop
58	Aoiffe Kelly	95	Peter Parsons
59	Simone Schmidt	96	Andrew Foster
60	Rosie Adams	97	Deborah Anderson
61	Jan Rose	98	Ellie Rosaia
62	Liz Gay	99	Chris Lehmann
63	Jacinta Pit	100	Sally Arnold
64	Jasmine Alexandra	101	Julia Jones
65	Francine Horne	102	Angela Salta
66	Marilyn Evenson	103	Pamela Rothfield
67	Tayla Jovanovic	104	Cathy Richardson
68	Debbie McMillan	105	Colleen Farrelly
69	Alan and Donna Moore	106	Sam Buckley
70	Sophie Wilcher	107	Jude Sky
71	Philip Anthoness	108	Sandra Rinderhagen
72	Robyn Henriksen	109	Lynn-Maree Milburn
73	Alison Boulton	110	Rosalie Grut
74	Janet Mitchell	111	Marjorie Miller
75	Suzannah Mee	112	Robert McGeary
76	Jeana Harris	113	Inge Cairns
77	Connie Gaeta	114	Sophia Grewal
78	Mirjana Durovic	115	Carole Meade
79	Lessa Thom	116	Name withheld
80	Sarah Barnet	116.1	Name withheld
81	Joan Clarkson	117	Annete Cooper
82	Ronda Conway	118	Brenda Greaves
83	Peta Heywood	119	Karen Jones
84	Tarryn Bunworth	120	Name withheld
85	Hilary Weaver	121	Jennifer Churches
85.1	Hilary Weaver	122	Gavin Fry
86	Shona Scot	123	Shreya Basu

124	Donna Ristitsch	162	Monique March
125	Meg Streiff	163	Anne Arnold
126	Andrea Davey	164	Loreta Bayly
127	Michael Gill	165	Vanessa Schempers
128	Rheusiuin Brown	166	Pat Dufau
129	Aysha Sezmis	167	Mark Osgood
130	Mandy Buzzard	168	Livestock SA
131	Michael Hepworth	169	Jane Siddall
132	Kirsty Owen	170	Boel Stridbeck
133	Judyann Buckler	171	Becky Wood
134	Paul Bevan	172	Kellie Kulinski
135	Karen Holmes	173	Kerry Stelling
136	Jacqueline Farquhar	174	Suzanne Finch
137	Koha Mason	175	Carole Atard
138	Sharon Tewes	175.1	Carole Atard
139	PIC Australia	176	Maggie Walton
140	RickiLee Stickler	177	Maureen Williams
141	Alison Vaubell	178	Tina Seaton
142	JBS Australia	179	Brenda Buzzell
143	Jennifer Mitchell	180	Lance Kammerud
144	Helen Coffey	181	Eric Sherman
145	Margaret Richardson	182	Veronica Leonard
146	Tim and Ro Lavers	183	Pepita Ridgeway
147	Angela Gibbs	184	Anne Martinez
148	Penelope Furphy	185	John and Robbie Wertin
149	Paula Thurston	186	Christine Smith
150	Peanuts Wellbeing Sanctuary	187	Frantzeska Tyrannes
151	Margaret Syrat	188	Karen Morgan
152	Jodie McGill	189	Marilyn Edwards
153	Eril Riley	190	Josephine Biagi
154	Carol Grose	191	Mari Mennel-Bell
155	John Rello	192	Cristina Zois
156	Lynete Shedden	193	Lucus Boudelot
157	Anna Zorzetti	194	Geraldine Marston
158	Lisa Holownia	195	Gail Griffith
159	Patrizia Cusack	196	Leisa Moore
160	Hendrina Korte	197	Debra Talbot
161	Sheila Welch	198	Sharee Fiume

199	Nicole Fiona	238	Julian Westcot
200	Warren McSaveney	239	Doris Clarke
201	Debra Yeomans	240	Michelle James
202	Maryrose Grabi	241	Roslyn Blackwood
203	Geraldine Thornely	242	Johan van Dijk
204	Lee Palumbo	243	Lisa Wood
205	Marlene Johnson	244	Number not used
206	Stephanie Margets	245	Jasmyn Ellis
207	Irene Lopez	246	Alison Webstet
208	Hannah van Maanen	247	Name Withheld
209	Angela Kitsos	248	Pam Massey
210	Rosa Morstyn	249	Name Withheld
211	Heather Godde	250	Number not used
212	Phillip Hawkes	251	Richard Fisher
214	Penny Carruthers	252	Angela Penrose
215	Caroline Melia	253	Kat Murray
216	Louise Wats	254	Georgina Bromwich
217	Shannon Bennet	255	Melissa Murphy
218	Nerissa Demetriou	256	Tracy Musket
219	Berit Lönnvik	257	Robyn Clancy
220	Victoria Madden	258	Michael Podbury
221	Aaron Mylnek	259	Annika Ernefelt
222	Isabel Abreu	260	Halina Garnys
223	Lena Donaker	261	Lucy Thornton
224	JoAnn Ellis	262	Louise Elliot
225	Shelly Paredes	263	Wendy Mason
226	Jane Urbanik	264	Number not used
227	Cecilia Egan	265	Animal Defenders Office
228	Alana Hadfield	266	Dave Cunneen
229	Michelle Ledwith	267	Laetitia Blanc
230	Barbara Whitle	268	Heather Johnson
231	Sophie Townsend	269	Cheryl Scot
232	Animals Australia	270	Blaze Bhence
233	Confidential	271	Lida Djamosi
234	Michael Doyle	272	Benny Piam
235	Roshanak Pilram	273	Peter Slatery
236	Asha Richardson	274	Roopa Mulik
237	Kaye Bignell	275	Karl Berzins

276	Confidential	314	Jackie Dente
277	Debbie Sage	315	Jessica Kong
278	Confidential	316	Name Withheld
279	Kristeen Wheeler	317	Lyndel Arnet
280	Tharun Sonti	318	Paty Mark
281	Leigh Hornsby	319	Linda Smith
282	Anna Travinskaia	320	Annemarie Jonson
283	Lucia Smith	321	Amelia F
284	Nandi van Wyk	322	Name Withheld
285	Natalie Kopas	323	Jan Saunders
286	Daniel Honig	324	Name Withheld
287	Kathryn Curran	325	Felicity Andersen
288	Gail Jameson	326	Judith Smullen
289	Confidential	327	Sienna Watson
290	Jing Fan	328	Hayley Ablot
291	Lauren Thomas	329	Kumudika Gunaratne
292	Brendan Rose	330	Jenny Barnes
293	Gail Sorbian	331	Cathy Trat
294	Manisha Lishman	332	Umida Muminova
295	Number not used	333	Jennifer Williams
296	Miranda Coulson	334	Elizabeth Keith-Ewing
297	Marni Pain	335	Helen Jeges
298	Name Withheld	336	Lesley Annesley
299	Gerald Hallam	337	Jon Roffe
300	Fran Miller	338	Kin Cornish
301	Sue Gorden	339	Name Withheld
302	Eva Mirowska	340	Number not used
303	Peter Jensen	341	Name Withheld
304	Joanne Johnson	342	Christine McCoy
305	Name Withheld	343	John Moore
306	Carole de Fraga	344	Name Withheld
307	Sri Durga Karthik	345	Breanna Sorbian
308	Michael Faltermaier	346	Jill Heydon
309	Kat Oakley	347	Number not used
310	Francesca Bailey	348	Anne Shannon
311	Susan White	349	Laksh S
312	Chelsea Liang	350	Name Withheld
313	Janet Pether	351	Keenan Bass

352	Terence Macleoid	390	Lusi Perry
353	Olga Vanzidler	391	Name withheld
354	Mark Quinlan	392	Ruth Gourley
355	Kerry Vojlay	393	Kate Savage
356	Benjamin Montet	394	Kara Hele
357	Name Withheld	395	Van Arul
358	Name Withheld	396	Bowen Hele
359	Meghan Quinlan	397	Ana Novic
360	Lucy Fox	398	Terry Jefferies
361	Martin Derby	399	Eve Power
362	Name Withheld	400	Name Withheld
363	Elizabeth Ordians-Darby	401	Kirsten Darling
364	Bianca Romero	402	Mark Dekker
365	Apiam Animal Health	403	Joellen Hair
366	Mackenzie Congreve	404	Rhonda Keating
367	Name Withheld	405	Raphael Brous
368	Michelle Crilly	406	Luke Freeman
369	Kate Paterson	407	Emile Sido
370	Name Withheld	408	Bryony Sumner
371	Daniel Lacey	409	Melissa Rubilar
372	Ruth Parramore	410	Wendy Grenfell
373	Number not used	411	Alex Rubilar
374	Name Withheld	412	Denise Lukas
375	Margit Rossi	413	Jennifer Davies
376	Name Withheld	414	Sally Court
377	Graeme Barnet	415	Name Withheld
378	Mary Neighbour	416	David Franks
379	Kerry Richards	417	Jay Triffit
380	Christie Noble	418	Miriam Poter
381	Kristen Nelson	419	Linda Lukas
382	Georgia Blomberg	420	Pam Ison
383	Emmanuel Nulty	421	Fiona Adin-James
384	Tania Krsinich	422	Luca Mancini
385	Puja Srinivas	423	Lisa Japp
386	Amarni Raschilla	424	Animal Justice Party
387	Name Withheld	425	Department of Energy, Environment and Climate Action
388	Name Withheld	426	Helena Kadlec
389	Karina Shircore		

427	Meegan Parry	464	Name Withheld
428	Name Withheld	465	Trevor Monti KC
429	Confidential	466	Katherine Beavis
430	Courtney Foxe	467	Mariko McConnell
431	Number not used	468	Name Withheld
432	Victorian Parliamentary Budget Office	469	Australian Alliance for Animals
433	Evelyn Funk	469.1	Australian Alliance for Animals
434	Tony Ralston	470	SunPork Group
435	Richard Parry	471	Chloe Hartley
436	Angela Blanchard	472	Liz Cameron
437	Cameron H	473	Natasha Slavec
438	Jan Cook	473.1	Natasha Slavec
439	Name Withheld	474	Ashley Carter
440	Finn Starbright	475	Monika Doepgen
441	B Starbright	476	Karen Shugg
442	Stamatia Venetis	477	Martin Gould
443	Tamara van Noort	478	John Young
444	Andrew Verlei	479	Lynete Bright
445	Rahime Mine Aragon	480	Morgan Watkins
446	Heidi Nicholl	481	Number not used
447	Deanne Vines	482	Atholie Harden
448	Name Withheld	483	Rebecca Cameron
449	Name Withheld	484	Glenn James
450	Benjamin Smith	485	Number not used
451	Vera Farr	486	Stephanie Jones
452	Claudia Madison	487	Chris Barker
453	Yvete Pollock	488	Number not used
454	Name Withheld	489	Name Withheld
455	Greg Coleman	490	Joan Bowker
456	Michelle Ryan	491	Confidential
457	Kim McDonald	492	Number not used
458	Lauren Agar	493	Sophia Dowell
459	Nadia Auff	494	Name Withheld
460	Sam Tarver	495	Hilary Hobart
461	Alexandra Paterson	496	Natalie Pelarek
462	Debbie Coassin	497	Josephine Connellan
463	Confidential	498	Katherine Ingwersen
		499	Kirsty Watkins

500	Shan Sun	538	Cassandra Heneghan
501	Name Withheld	539	Diana Cao
502	Michelle Neilson	540	Catherine Pisani
503	Name Withheld	541	Lorna Elisei
504	Bonnie Kuru	542	Ramona Headifen
505	Helen Kardos	543	Australian Pork Limited (APL)
506	Jocelyn Clarke	543.1	Margo Andrae
507	Thomas Russell	543.2	Confidential
508	Jeanete Dodgshun	544	Dylan Kiernan
509	Brad Pedersen	545	Manuela Ferstl
510	Number not used	546	Millie Tizzard
511	Name Withheld	547	Name Withheld
512	Name Withheld	548	Manuela Ferstl
513	Farm Transparency Project	549	Hayley Curtis
514	Michael Dello-Iacovo	550	Franziska Wagenfeld
515	Penelope Hocking	551	Rob Clifton
516	Number not used	552	Warren Smith
517	Patricia Carden	553	Gail Donlan
518	Jasmine Gale	554	Hayley Henderson
519	Edgar's Mission	555	Joy Verrinder
520	Ellie Robertson	556	Jade Panozzo
521	Anna Hall	557	Maddy Mancini
522	Name Withheld	558	Name Withheld
523	Jackie Wallace	559	John Woods
524	Chris Hughes	560	Shahab Khan
525	Carol Wat	561	Number not used
526	Gudrun Gunnarsdottir	562	John McKay
527	Nicole Daley	563	Vanda (aka Wanda) Grabowski
528	Kieren Watkins	564	Natalie Janinski
529	Susan Linley	565	Confidential
530	Samuel Beyer	566	Dale Morison
531	Robin Wright	567	Number not used
532	Diana Palmer	568	Claudia Barnes
533	Name Withheld	569	National Farmers' Federation
534	Eleanor Quibell	570	Terri Beech
535	Janine Bugg	571	Bronwen Mancini
536	Susan Etherington	572	Daniel Cung
537	Casey Morrissey	573	Australian Food Sovereignty Alliance

574	Animal Justice Party Aotearoa NZ	612	Name Withheld
575	Debra McCoy	613	Mark Kingma
576	Cristie Butler	614	Sky Liu
577	Rupert Macgregor	615	Number not used
578	Oscar Delaney	616	Axel Hengmen
579	Lydia Kiternas	617	Arne Christian
580	Wendy Dugmore	618	Kirill Knutson
581	James (Jim) Willis	619	Kane Haugen
582	Heather Barnes	620	Palle Kemper
583	Markus Manns	621	Larson Sven
584	Australian Meat Industry Council	622	Jesper Christian
585	Jo Hobson	623	Kellen Dunn
586	Stephane Mercier	624	Name Withheld
587	Sharon Casagrande	625	Franses Ingram
588	Anne Sherman	626	Name Withheld
589	Confidential	627	Ruth Hodgson
590	Name Withheld	628	Heather Browning
591	Name Withheld	629	Rhondda Field
592	Lisa Magnusson	630	Arrabella Dee
593	David Coorey	631	Maree Daniels
594	Catherine Camplin	632	Alyssa Wormald
595	Marta Bako	633	Suzanne Bowen
596	Gillian Miller	634	Teresa Buss-Carden
597	Alex Popof	635	Colleen Wysser-Martin
598	Lily Carrington	636	Julie Jeffery
599	Josh O'Riordan	637	Ralph Graham
600	Susan Dew	638	Kim Wellspring
601	Rugmini Venkataraman	639	Name Withheld
602	Karthik Venkataraman	640	M Lynch
603	Name Withheld	641	Name Withheld
604	Confidential	642	Ann-Maree McKee
605	Sarah Cunningham	643	John Cheshire
606	Gaetan Selle	644	Elisabeth O'Sullivan
607	Loreta Gasparini	645	Bridget Netley
608	Mylene Bennet	646	Kamilla Borzeta
609	Mary Apostolopoulos	647	Courtney Henry
610	Ruby Hardie	648	Confidential
611	Kim Gambrill	649	Mary Romeo

650	B Johnson	688	Chris Rossi
651	James Rich	689	Elliot Fitzgerald
652	Ian Gordon	690	Tarundeep Dhaliwal
653	Name Withheld	691	June Fitzgerald
654	Name Withheld	692	Capri Walsh
655	Leigh Erwin	693	Mitchell Laughlin
656	Bob Seymour	694	David Cao
657	Mary Ann Gourlay	695	Donald Fitzgerald
658	Paige Gordon	696	Natalie Wojacki
659	Name Withheld	697	Simone Hunter
660	Stacey Anwin	698	Jacek Siemiatkowski
661	Stella Braddick	699	Leah Horsfall
662	Jeremy Tonkin	700	Adrian Ly
663	Chris Romeo	701	Jacob Kovacevic
664	Shayne Cooper	702	Confidential
665	Lipika Basu	703	Maureen Howard
666	Narelle Huxley	704	Mariaelena Nobili
667	Debbi Webby	705	Rohanna Mohr
668	Emma Liana Gonzales	706	Jane Pinchback
669	Tonje Akerholt	707	Yash Misra
670	Jean Tait	708	Fiona Mallia
671	University of Melbourne Vegan Club	709	Name Withheld
672	Gurneek Dhingra	710	Kasuni Punchi
673	Shanae P	711	Elizabeth Atard
674	Elizabeth Johnston	712	Name Withheld
675	Number not used	713	Locky Chong
676	Karrin Hill	714	Name Withheld
677	Christine Peek	715	Wen-Ning Liao
678	Guin Wilson	716	Tamasin Ramsay
679	Katrina Larsen	717	John Landon
680	Joe Erftemeyer	718	Name Withheld
681	Louis Spencely	719	Hollie Kirby
682	Name Withheld	720	Name Withheld
683	Scot Madison	721	Catriona Marshall
684	Suneeti Misra	722	Jason Albury
685	Josef Holownia	723	Daniel Johnson
686	Alok Misra	724	Amelia Natoli
687	Jordan Burnet	725	Catherine Alexander

726	Michael Mackie	764	Name Withheld
727	Jake White	765	Name Withheld
728	Rahul Gururaj	766	Terry Breen
729	Eugene Lubarsky	767	Pamela Wren
730	Name Withheld	768	Petra Jones
731	Michael Bouchier	769	Carolyn Walters
732	Chatura Atanayake	770	Abigail Lewis
733	Kai Weinbeck	771	Amanda Pringle
734	Skye Kirby	772	Alwyn Rubie
735	Darren Camilleri	773	Andy Hook
736	Robert Davy	774	Laurel Beck
737	Name Withheld	775	Name Withheld
738	Priyanga Gamage	776	Ellie Herodes
739	Sarah Wade	777	Number not used
740	Vanessa Sarre	778	Dorian Hill
741	Paulete Smythe	779	Margaret Shelton
742	Sarah Qequus	780	Michael Anagno
743	Peter Houston	781	Lucy Williams
744	Susan Bailey	782	Mark Stephen
745	Dimitrios Kailaris	783	Gloria D Mello
746	Dennis Oter	784	Holly Siters
747	Name Withheld	785	Heather Cooke
748	Marcia Simons	786	Rebecca Jenner
749	David McKay	787	Name Withheld
750	Name Withheld	788	Ian Pascarl
751	Clinton Seares	789	Shohre Mansouri Jajae
752	Polly Watkins	790	Angela Rodgers
753	Louisa Vlahos	791	Susan Agar
754	Johanna Straney	792	Michael Rolik
755	Mathew Kelly	793	Janice Haviland
756	Richard Barnes	794	Christopher Ball
757	Sandra Haddad	795	Name Withheld
758	Marco Giannetoni	796	Senem Cabuk
759	Name Withheld	797	Michelle Richardson
760	Marianne Montgomery	798	Name Withheld
761	Janice Conlon	799	Lisa Mackinnon
762	Confidential	800	Name Withheld
763	Maggie Abbot	801	Alex Huerta

802	Rob Batchelor	840	Cathryn Wills
803	Theresa Vanderwyk	841	Justiene Hunter
804	Ruby Stevens	842	Andrew Consolino
805	Jemma Meecham	843	Roshanak Pilram
806	Heather Harris	844	Catherine Gleeson
807	Name Withheld	845	Murray Sharp
808	Oliver Davenport	846	Emma Sandford
809	Number not used	847	Teneil Zerbst
810	Paul Cosgrave	848	Lisa Musgrove
811	Name Withheld	849	Gwyn Beaumont
812	Name Withheld	850	Jemma Meecham
813	Katie Flannigan	851	Aruna Manandhar
814	Lisa Watson	852	Nicole Beasley
815	Name Withheld	853	Jordan von Eitzen
816	Name Withheld	854	Anne Shirley
817	Number not used	855	George Nishihama-Koch
818	Fiona Mariposa	856	Meredith Greer
819	Michael Fuery	857	Sally Allaway
820	Oliver Culshaw	858	Amy Reid
821	Catherine Jackson	859	Patricia Kovacic
822	Sandstone McNamara	860	Australian Veterinary Association
823	Name Withheld	861	Bill Langford
824	Name Withheld	862	Marguerite Cordell
825	Name Withheld	863	Carolyn Malkin
826	Thomas Penney	864	Rebecca Agar
827	Joan Kelly	865	Vicki von Eitzen
828	Name Withheld	866	Scot Pearce
829	Colleen Hall	867	Name Withheld
830	Jennifer Baxter-Johnson	868	Name Withheld
831	Sue Hill	869	Helen Corker
832	Natasha Reus	870	Vicki Steggall
833	Simon Garrod	871	Stephen Crisp
834	Harriet Todd	872	Melissa Dominguez
835	Vanessa Cuesta Da Silva	873	Nerida Fearnley-Gill
836	Siobhan Hedderman	874	Kaye Trainor
837	Jan Michaud	875	Michelle Marler
838	Jeffrey Soar	876	Annelou Jasnen Jansen
839	Anna Metaxas	877	Roslyn Williams

878	C. Egan	916	Natalie James
879	Name Withheld	917	Alexandra Kleanthous
880	Name Withheld	918	Gregory Bilston
881	Vanessa Mignon	919	Courtney Payne
882	Francis Webster	920	Sarah Fitzgerald
883	Ashley Kimber	921	Name Withheld
884	Number not used	922	Sue Paley
885	Tanya Apps	923	Carolyn Raby
886	Nina Manners	924	Miriam Cooper
887	Linda Ashworth	925	Name Withheld
888	Katrina Osgood	926	Name Withheld
889	Scot Ashworth	927	Jacqui Owens
890	Julija Merljak	928	Irene Salad
891	Melina Mura	929	Laura Fullock
892	Number not used	930	Ilana Rudaizky
893	Celeste Manwaring	931	Danielle Tremblay
894	Danielle Augustino	932	Richard Carrington
895	Sarah Cutting	933	Name Withheld
896	Hollie Borden	934	Brenda Westcot
897	Number not used	935	Sue Nightingale
898	Number not used	936	Narelle Lindner
899	Jean-Pierre Maillard	937	Georgia Craigie
900	Wendy Roper	938	Number not used
901	John Muir	939	Trevor Rowntree
902	Tina Clements	940	Kerri Thomson
903	Shirley Mills	941	Emily Rice
904	Emma Madle	942	Rebecca McMullen
905	Najwa Amir	943	Pam Thomson
906	Name Withheld	944	Belinda Oppenheimer
907	Benjamin Hesp	945	Hugh Coton
908	Milva Tamburro	946	Laura Lumachini
909	Joshua Wong	947	Andrew Gunnyon
910	Jade Vigilante	948	Tara Sharma
911	Sania Saeed	949	Tom Marty
912	Jackie Wolf	950	Caroline OBrien
913	Claire Levi	951	Samra Teague
914	Clare Herscovitch	952	Janna Plint
915	Rachel Lamarche	953	Name Withheld

954	Jason Kennedy	992	Carolyn Cooper
955	Ayelen Arantxa Gallardo Cubas	993	Tessa Lynch
956	Tristan Jones	994	Ana Cozmescu
957	Glenn Fraser	995	Benjamin Street
958	Number not used	996	Number not used
959	Kerryn Marlow	997	Victoria Sublete
960	Kathleen Carrington	998	Christina Jarvis
961	Marie Aaltonen	999	Eve Levens
962	Name Withheld	1000	Janet Hall
963	Roslyn Mahon	1001	Mark Cutler
964	Mahsa Khatibi	1002	Trisha Jarvis
965	Stephanie Chamberlain	1003	Karen Hogg
966	Magda Cordingley	1004	Number not used
967	Number not used	1005	Callan Bourne
968	Rachel Young	1006	Name Withheld
969	Stella Heley	1007	Gordon Elkington
970	Jodie Chynoweth	1008	Theresa Bradley
971	Miriam Wallman	1009	Sarah Oterburn
972	Alisha Tampalini	1010	Paula Thurston
973	Nicholas Banham	1011	Jo Taylor
974	Jillian Hunt	1012	Name Withheld
975	Confidential	1013	Peter Bistak
976	Number not used	1014	Merit Tabak
977	Andrew McGlashan	1015	Alison Mitchell
978	Karen Carpenter	1016	Mandy Mckenzie
979	Name Withheld	1017	Joanne Bell
980	Lea McBride	1018	Kathy Blessing
981	Saira Huxtable	1019	Sue Brown
982	Elizabeth Nelson	1020	Rachel Oakley
983	Fiona Bannister	1021	Shoba Nair
984	Lauren Camilleri	1022	Genevieve Davey
985	Number not used	1023	David Haritos
986	Name Withheld	1024	Julie Cartwright
987	Name Withheld	1025	Name Withheld
988	Kerry Tacey	1026	Dianne Macleod
989	Ilona Crabb	1027	Peter Murray
990	Confidential	1028	Harley McDonald-Eckersall
991	Sonja Ristevski	1029	Aeger Kingma

1030	Vegan Australia	1068	David Croft
1031	Anna Clark Doyle	1069	Quentin Dresser
1032	Rebecca Andersen	1070	Corinne Feldmann
1033	Name Withheld	1071	Rebeccah Taylor
1034	Owen Smith	1072	Melanie Ellis
1035	Mary Forbes	1073	Name Withheld
1036	Tiffany Keele	1074	Number not used
1037	Bronwen Seller	1075	Anna Lukaszewicz
1038	Emma Grundy	1076	Grahnia Crisp
1039	Tracey Ross	1077	Keith Smith
1040	Karin Wentworth-Ping	1078	Angela Payne
1041	Jemma Meecham	1079	Nicky Nolan
1042	Roxanne Basto	1080	Marion Ferguson
1043	Jennifer Hole	1081	Number not used
1044	Priscilla Martinez	1082	Sue Wells
1045	Amanda McGovern	1083	Rosemary Moore
1046	Sarah Stewart	1084	Alice Le Huray
1047	Kathleen Watson	1085	Number not used
1048	Sarah Byrnes	1086	Susan Buckland
1049	Jemma Fitock	1087	Angela Phoenix
1050	June Frost	1088	Robyn Reichert
1051	Gerard Bisshop	1089	Name Withheld
1052	Nicholas Swales	1090	Bart Ahluwalia
1053	Cara Artman	1091	Clare Hooson
1054	Allan Pearce	1092	Name Withheld
1055	Luise Pearson-Bernoth	1093	Confidential
1056	Allan McKenzie	1094	Manon Cameron
1057	Deb Gemmell	1095	Number not used
1058	Kylie McLeod	1096	Jacqui Clarke
1059	Sharon Straub	1097	Fee Connolly
1060	Ruby Keogh	1098	Anna Medick
1061	Anne Lewitzka	1099	Lyn Fowler
1062	Mathew Micallef	1100	Christel Medick
1063	Clare Mann	1101	Name Withheld
1064	Julie Barnes	1102	Serena D'Alessandro-Rodger
1065	Laura Pytlik	1103	Name Withheld
1066	Marta Paling	1104	Joni Carnegie
1067	Number not used	1105	Josephine Erlich

1106	Cynthia Smart	1144	Patti Schultze
1107	Name Withheld	1145	Helena Martin
1108	Number not used	1146	Giuliana Belousow
1109	Lisa Tichenor	1147	Karen Wolf
1110	Fiona Clancy	1148	Arna Cortazzo
1111	Number not used	1149	Martin Reifinger
1112	Jane Morgan	1150	Rebecca Varner
1113	Number not used	1151	Marina Tiedemann
1114	Number not used	1152	Number not used
1115	Name Withheld	1153	Number not used
1116	Monique Balaban	1154	Number not used
1117	Tony Paterson	1155	Norma Kinnison
1118	Helen Stevens	1156	Kathy Bradley
1119	Rachel Carapetis	1157	Number not used
1120	Louis Gauci	1158	Angela Stuebben
1121	Jane Thomson	1159	Sarah Meyers
1122	Roxana Anabella Sagona	1160	Sven Sorge
1123	Number not used	1161	Tomoyo Tamatani
1124	Number not used	1162	Jonathan Baliko
1125	Allen Fromowitz	1163	Ellen Stauffer
1126	Christiane Tanner	1164	Bettina D'mello
1127	James Sorrells	1165	Name Withheld
1128	Jana Harker	1166	Stephen Bloomfield
1129	Ronald Lemmert	1167	Name Withheld
1130	Thomas Willis	1168	Ann Cobbold
1131	Heather Decker	1169	Name Withheld
1132	Nerys Lloyd-Pierce	1170	Name Withheld
1133	Theodoros Aslanoglou	1171	Number not used
1134	Janet Wheeler	1172	Name Withheld
1135	Chantal Buslot	1173	Peter Rylander
1136	Maryeta Pinn	1174	Marguerite Broadley
1137	Jane Miller	1175	Christopher Lake
1138	Rhonda Johnson	1176	Brendan Kelly
1139	James Parker	1177	Rosie Jacka
1140	Daniela Fernandes	1178	Barton Grimm
1141	Avo Lill	1179	Sylvana R Arguello
1142	Number not used	1180	Vicky Iafrati
1143	Number not used	1181	Ron Berliner

1182	Eugene Brusin	1220	James Kleszyk
1183	J Bocchino	1221	Christine Brazzell
1184	Pat Lowe	1222	Name Withheld
1185	Sandra Cresci	1223	Paul Grimmond
1186	Monica Sholly	1224	Brian Swayne
1187	Steve Petyerak	1225	Valerie Nordberg
1188	Christopher Tumolo	1226	Number not used
1189	Clare Doran	1227	Francesco Di Tacchio
1190	Number not used	1228	Marian Hussenbux
1191	Vicki Pellegrini	1229	Diana Tomkins
1192	Randy Kravis	1230	Number not used
1193	Name Withheld	1231	Jörg Gaiser
1194	Ayelet Evron	1232	Juliete Claridge
1195	Name Withheld	1233	Giacomina Laura Sheridan
1196	Gordana Janinska	1234	Simone Booth
1197	David Benn	1235	Raymond Kennedy
1198	Trina McMillan	1236	Tamsin Dancer
1199	Carla McCannon	1237	Bridgete Scarff
1200	Glenn Nappi	1238	Name Withheld
1201	Number not used	1239	Confidential
1202	Jonathan Schaap	1240	Karl Hanes
1203	Melvy Connell	1241	Mat Flood
1204	Cheryl Urquhart	1242	Name Withheld
1205	Cheryl Forrest-Smith	1243	Keven Gray
1206	Name Withheld	1244	Elaine Meeklah
1207	Miriam Waldock	1245	Lozz Starseed
1208	Katrina Nelson	1246	Animal's Angels
1209	Name Withheld	1247	Rebekah Wood
1210	Number not used	1248	Iris Paty Yermak
1211	Paul A	1249	Michelle Ryan
1212	Name Withheld	1250	Rick O'Reilly
1213	Sharon Haton	1251	Number not used
1214	Catherine Fulton	1252	Heidi Horvath
1215	Name Withheld	1253	Rupert Veitch
1216	Name Withheld	1254	Neale Blackwood
1217	Number not used	1255	Billy Tobin
1218	Andrea Rohr	1256	Sara Lagonigro
1219	Name Withheld	1257	Number not used

1258	Julie Reid	1296	Jodi Brown
1259	Helen Huszar-Welton	1297	Ajith Bhojani
1260	Boel Stridbeck	1298	Number not used
1261	Stella Col	1299	Jack Strom
1262	Suzi Beaton	1300	Name Withheld
1263	Name Withheld	1301	Name Withheld
1264	Tony Clunies-Ross	1302	Allan Samyia
1265	Number not used	1303	Kylie Richardson
1266	Number not used	1304	Sybil Scholz
1267	Number not used	1305	Number not used
1268	Name Withheld	1306	Kay Peacock
1269	Clea Eykelkamp	1307	Justine Mahoney
1270	Luke Klein	1308	Number not used
1271	Ian Kruger	1309	Taryn Haynes
1272	Michelle Atkinson	1310	Jennifer Kinsela
1273	Name Withheld	1311	Amy Dozier
1274	Number not used	1312	Name Withheld
1275	Cal Cal	1313	Jenna Ong
1276	Gary Reid	1314	Judith Rodda
1277	Gypsy Wulff	1315	Number not used
1278	Jane Coburn	1316	Sarah Davis
1279	Martin Chung	1317	Number not used
1280	Name Withheld	1318	Name Withheld
1281	Christine Hartley	1319	Confidential
1282	Gabi Smalley	1320	Toby Blauwasser
1283	Jennie Rolon	1321	Diddi Laino
1284	Caroline Miller	1322	Number not used
1285	Hilton Solyom	1323	Number not used
1286	Bambi Smyth	1324	Xavia Kaka
1287	Lani Annesley	1325	Aileen Grey
1288	Ornella Ferrari Gigante	1326	Marie Ann Phillips
1289	Number not used	1327	Malcolm Macdougall
1290	Elissa Annesley	1328	Michelle Berkon
1291	Kathryn Gallagher	1329	Name Withheld
1292	Number not used	1330	Judith Dixon
1293	Kirsten Guthmann	1331	Suzanne Vandenberg
1294	Carolynne Marks	1332	Rosanna Mutzabaugh
1295	Sade Rose	1333	Vanessa Schempers

1334	Carolyn Lynn	1372	Ailsa Denton
1335	Terry Ganda	1373	Sheila Welch
1336	Name Withheld	1374	Nick Andrews
1337	Elizabeth Morrison	1375	Juliet Simonis
1338	Robyn Wilkins	1376	Name Withheld
1339	Number not used	1377	Wendy Francis
1340	Krystyna Kappel	1378	Name Withheld
1341	Lynn Friend	1379	Name Withheld
1342	Name Withheld	1380	Fiona Curl
1343	Sandra Bell	1381	Dogan Ozkan
1344	Bernardine Timmins	1382	Name Withheld
1345	Carolyn Wilson	1383	Judith Leslie
1346	Phoebe Cadogan	1384	Name Withheld
1347	Caroline Sévilla	1385	Cathy Blasonato
1348	Jessica Freeman	1386	Name Withheld
1349	Ruth Trimboli	1387	Jacqueline Wickham
1350	Sue Viewing	1388	Number not used
1351	Rona Goold	1389	Sophie Hann
1352	Michael Tutek	1390	Name Withheld
1353	Alexander Ferrara	1391	William Lazaro
1354	Justin Fleming	1392	Number not used
1355	Number not used	1393	Silvia Rocha
1356	Ann-Maree Rochford	1394	Jodie Farrell
1357	Michelle Rocco	1395	Name Withheld
1358	RSPCA Victoria	1396	Mark Weinberger
1359	Number not used	1397	Duncan Macintosh
1360	Geoff Simpson	1398	Joel Newman
1361	Tammy Baten	1399	Kevin Coleman
1362	Lisa Allis	1400	Denise Bryant
1363	Margaret Winsor	1401	Kiralee Derriman
1364	Number not used	1402	Miles Tidmarsh
1365	Trent Scot	1403	Gimasha Botheju
1366	Number not used	1404	Diane Pearce
1367	Iana Araco	1405	Susan Woodbury
1368	Name Withheld	1406	Michelle May
1369	Bev Rae	1407	Helen Johnston
1370	Number not used	1408	Galena Debney
1371	Jackie Wynter	1409	Linda Greer

1410	Francesca Mildie	1448	Melanie Burge
1411	Jamie Sims	1449	Joanne Vanzella
1412	Jane Mari	1450	Name Withheld
1413	Karyn Souder	1451	Name Withheld
1414	Alicia Sutton	1452	Paula Creek
1415	Name Withheld	1453	Sudipta Dasgupta
1416	Maria Beswick	1454	Name Withheld
1417	Nathalie Bergon	1455	Noelle Taylor
1418	Bronwen Evans	1456	Katrina Symes
1419	Petra Muller	1457	Donna Brennan
1420	Bryn Hills	1458	Jess Miton
1421	Ben Hurn	1459	Dianne Scot
1422	Daniel Ryan	1460	Martine Holberton
1423	Graeme Leishman	1461	Dennis Foote
1424	Name Withheld	1462	Jasmine Alexandra
1425	Inara Sturgeon	1463	Confidential
1426	Hannah Chedzey	1464	Stephanie Margets
1427	Ayisha Herculinskyj	1465	Lisa Meadows
1428	Robert Jacket	1466	Heather Harris
1429	David Black	1467	Sue Schofield
1430	Salome Argyropoulos	1468	Mira Thurner
1431	Robert Paterson	1469	Callum Dyer
1432	Naomi Murn	1470	Scot Smith
1433	Vivienne Feather	1471	Verity Pont
1434	Erin Connolly	1472	Robin Searson
1435	Name Withheld	1473	Gareth Caldwell
1436	Name Withheld	1474	Jayne Stickler
1437	Name Withheld	1475	Maddie Kirk
1438	Number not used	1476	Sian Tether
1439	Jeremy Prangnell	1477	Johannah Maher
1440	Jacinta Nicholls	1478	Penelope Frances FitzGerald
1441	Name Withheld	1479	Greg Lees
1442	Number not used	1480	Jan Kendall
1443	Keith Marsh	1481	Charles Davis
1444	Simone Malcolm	1482	Sweta Lal
1445	Michelle Clancy	1483	Western Plains pork
1446	Name Withheld	1484	Number not used
1447	Rafael Fabris	1485	Valerie King

1486	Luna Cameron-Parrish	1524	Jonathan Knot
1487	Wendy Riley	1525	Name Withheld
1488	Number not used	1526	Eva Reda
1489	Joanna Wats	1527	Quinn Romyne
1490	Bonnie Gelman	1528	Connie Voisey-Barlin
1491	Liz Buckley	1529	Susan Sorensen
1492	Number not used	1530	Number not used
1493	Victoria Shroff	1531	Name Withheld
1494	Sarah Poter	1532	Name Withheld
1495	Name Withheld	1533	Dominic Brown
1496	Michelle Hayward Hayward	1534	Jeanete Danos
1497	Name Withheld	1535	Bret Goodrich
1498	Hilary Ilot	1536	Laura Tuckwell
1499	Lachlan Smith	1537	Jan Heald
1500	Stefan Testi	1538	Katrina Fraser
1501	Peter Wells	1539	Erin Saunders
1502	Julia Carpenter	1540	Amanda Dorn
1503	Stuart Perera	1541	Julian Coxall
1504	Jackie Trevillian	1542	Alan McLean
1505	Name Withheld	1543	Elena Enescu
1506	Name Withheld	1544	Pat Horan
1507	Anna Stadnik	1545	Carolyn Gilpin
1508	Name Withheld	1546	Name Withheld
1509	Rosemary Spencer	1547	Delfina Manor
1510	Name Withheld	1548	Fiona Chapman
1511	Name Withheld	1549	Monika Janinski
1512	Name Withheld	1550	Wendy Harrison
1513	Les Sutherland	1551	Name Withheld
1514	Name Withheld	1552	Number not used
1515	Name Withheld	1553	Beth Wallis
1516	Rita Cauchi	1554	Lorraine Penfold
1517	Terri Morris	1555	Jodi Vermaas
1518	Bradley Tjandra	1556	Carmel Barry
1519	Catherine Stern	1557	Name Withheld
1520	Lois Watson	1558	Sue Forrester
1521	Rallou Lubitz	1559	Jessica Cosgriff
1522	Lara Drew	1560	Calvin Tromp
1523	Peter Thornton	1561	Jenny McKay

1562	Danielle Margaret	1600	Marian Lorrison
1563	Cooper Ehlers	1601	Zoe Rosenberg
1564	Marie Stumhoefer	1602	Desiree Macdonald
1565	Jennifer Churches	1603	Name Withheld
1566	Name Withheld	1604	Anne Shackman
1567	Name Withheld	1605	Robert Bender
1568	Number not used	1606	Dianne Luc
1569	Franklin Hynes	1607	Leonora Davidson
1570	Linda Steeth	1608	Siobhan Foster
1571	Name Withheld	1609	Jantine Kiewiet
1572	Name Withheld	1610	Kate Harris
1573	April Jarret	1611	Name Withheld
1574	Name Withheld	1612	Belinda Hatzievangelou
1575	Name Withheld	1613	John Strieker
1576	Chris Chapman	1614	Christine Guthry
1577	Jasmine Brazilek	1615	Janice Morgan
1578	Greg Sadler	1616	Gregory Schroeder
1579	Confidential	1617	Name Withheld
1580	Krystal Ha	1618	Elizabeth Gillam
1581	Don Stokes	1619	Bevin McLaren
1582	Yolete De Zilwa	1620	Vera Sissons
1583	Name Withheld	1621	Mariam Sabbo
1584	Denise Dickinson	1622	Clare Reddaway
1585	Annabel Luketic	1623	Erin Morrison
1586	Tracey Healand	1624	Tracey Carroll
1587	Bety and Wilfried Seelig	1625	Jo Mansutti
1588	Gonzalo Arellano	1626	Bryan McGrath
1589	Oznur Mezgil	1627	Gary Radler
1590	Glenys Fraser	1628	Ishani Gunasekara
1591	Stephen Seelig	1629	Kerry Mould
1592	Sheila Neville	1630	Michele Layet
1593	Maria Beswick	1631	Jennifer Moxham
1594	Jill Redwood	1632	Mary Valpied
1595	Michael Keary	1633	Dale Prescot
1596	Angie Tonks	1634	Madeleine Randall
1597	Name Withheld	1635	Nola Petet
1598	Heather-Maree Thompson	1636	Margot Dunne
1599	Kevin Tealby	1637	Amy Johnson

1638	Name Withheld	1676	Felicity Crombach
1639	Angela Osborne	1677	Trish Schultz
1640	Ray Harding	1678	Sue and Rob Taylor
1641	Caroline Toomey	1679	Chloe-Nicole Bignoux
1642	Name Withheld	1680	Ella O'Sullivan
1643	Alycce Kruse	1681	Name Withheld
1644	Aisha Slater	1682	Marie Aaltonen
1645	Elaine Pullum	1683	Terence Welsh
1646	Leigh Saward	1684	Bridget Block
1647	Justine Curatolo	1685	Name Withheld
1648	Lauren Williams	1686	Jennifer Edward
1649	Name Withheld	1687	Jacqueline King
1650	Amelia Beckley	1688	Anne Otaway
1651	Name Withheld	1689	Tanya Loos
1652	Brian Barnes	1690	Diana Hoopmann
1653	Susan Meagher	1691	David Thomas
1654	Brenda Smith	1692	Julie Christie
1655	Name Withheld	1693	Eadmund Izzard
1656	Kary Straton	1694	Name Withheld
1657	Catherina Badger	1695	Michele McCulloch
1658	Gillian Devine	1696	Gabriella Barret
1659	Jill Bough	1697	Bridget Kelly
1660	Yvonne Elderhurst	1698	Name Withheld
1661	Robyn Walton	1699	Faye Demmler
1662	Maxine Jacona	1700	Felicia Loh
1663	Andrew Napier	1701	Maggie Browne
1664	Name Withheld	1702	Jason Oates
1665	Pier Jessel	1703	Donna Devlin
1666	Geoffrey Bricknell	1704	Sally-Anne Hains
1667	Vikram Jaggi	1705	Sarah Davenport
1668	Confidential	1706	Lynda Blakely
1669	Sonya Skok	1707	Jann Millickan
1670	Felicity Van Rysbergen	1708	Jill Ryan
1671	Amanda Gordon-Lee	1709	Libby Prince
1672	James Wang	1710	Christine Archer
1673	Sue Mason	1711	Lisa Keddie
1674	Joanne Gibbs	1712	Jenny Macfarlane
1675	Jason Dodson	1713	Name Withheld

1714	Confidential	1752	Michaela Rutherford
1715	Alivia Lester	1753	Wendy Pitman
1716	Sherrill Carta	1754	Name Withheld
1717	Name Withheld	1755	Name Withheld
1718	Glenys Hazelman	1756	Anna Weatherlake
1719	Name Withheld	1757	Caroline Ashworth
1720	Patricia Loughran	1758	Vanessa Sadler
1721	Lila Carlton-Doney	1759	Denise Duckworth
1722	Samantha Hadnut	1760	Name Withheld
1723	Deirdre McGovern	1761	Name Withheld
1724	Name Withheld	1762	Helen Carmody
1725	Russel Baader	1763	Name Withheld
1726	Lauren Luitingh	1764	Name Withheld
1727	Sharon Watkins	1765	Jamie Overend
1728	Pork SA	1766	Name Withheld
1729	Gail Canning	1767	Name Withheld
1730	Name Withheld	1768	Jacinta Smith
1731	Kerry Baker	1769	Jane de Vries
1732	Judy Hungerford	1770	Melissa Manning
1733	Christine Cappello	1771	Lucy Jones
1734	Roz Germov	1772	Kerin Fogarty
1735	Name Withheld	1773	Lizzy Taylor
1736	Margaret Knot	1774	Name Withheld
1737	Marie ashworth	1775	Name Withheld
1738	Marianne Luise Persson	1776	Meredith Sorensen
1739	Lisa-Jane Lohning	1777	Krista Malloch
1740	Name Withheld	1778	Karen Gray
1741	Vivien D'Aquino	1779	Tony Brook
1742	Karen Davit	1780	Joanna Vautier
1743	Mark Coupe	1781	Andrew Robertson
1744	Melissa Browne	1782	Name Withheld
1745	Paula Polson	1783	Name Withheld
1746	Victoria Barnes	1784	Helen Holliday
1747	Rosalie Wallen	1785	Name Withheld
1748	Martin Breier	1786	Andrew Sherman
1749	Olaf Scot	1787	Andy Pointon
1750	Number not used	1788	Name Withheld
1751	Jessica Shepherd	1789	Suzanna See

1790	Ayarnee O'Neill	1828	Haydn Spurrell
1791	Tessa Dentry	1829	Karissa Spindler
1792	Bridget Brooklyn	1830	Jamie Amodeo
1793	Max Tandy	1831	Name Withheld
1794	Kochava Lilit	1832	Rosemary Lavin
1795	Steven Merriel	1833	Jeanete Newton
1796	Lyndi Chapman	1834	Zoe Butler
1797	Michelle De Jong	1835	Pamela Twinning
1798	Lucas Lewit-Mendes	1836	Kenji Kwan Tat
1799	Myra McRae	1837	Paul Crump
1800	Jennifer Edwards	1838	Tayla Jovanovic
1801	John Muir	1839	Clair Knobloch
1802	Confidential	1840	Mikhaila Crosbie
1803	Sharon Herodes	1841	Charlotte Camer
1804	Linda Pereboeff	1842	Cara Artman
1805	Meg Barber	1843	Rae Le Serve
1806	Shana Stewart	1844	Dorothy Johnston
1807	Name Withheld	1845	Name Withheld
1808	Name Withheld	1846	Frances Flores
1809	Leni Carrion	1847	Lucas Lovis
1810	Sharon Scull	1848	Lynne Bertram
1811	Rob Scull	1849	Name Withheld
1812	Adam Dalzoto	1850	Stockyard Industries
1813	Jason Glasson	1851	Wendy Morrison
1814	Vanessa Hollowell	1852	Inti Ferrero Harris
1815	Mia Davies	1853	Name Withheld
1816	Maria Soria	1854	Name Withheld
1817	Dion Carroll	1855	Name Withheld
1818	Rebecca Dickinson	1856	Ayanthi De Silva
1819	Lisa Ackermann	1857	Savannah McCall
1820	Gail Bell	1858	Michelle Jane
1821	Name Withheld	1859	Name Withheld
1822	Kim De Bruis	1860	Lena Bodin
1823	Carolyn Kightley	1861	Hudson Kerry
1824	Emily Bakker	1862	Trinity Hooper
1825	Sarah Hunter	1863	Marcus Ten Low
1826	Sophie Wilcher	1864	Russell Williams
1827	Navec Lorkin	1865	Edward Strong

1866	Ellen Blackman	1904	Auspork Limited
1867	Number not used	1905	Ateeq Ur Rehman Zafar
1868	Monika Merkes	1906	Donna Diamond
1869	Name Withheld	1907	Number not used
1870	Elizabeth Hardcastle	1908	Curran Joon
1871	Number not used	1909	Name Withheld
1872	Name Withheld	1910	Virginia Amorebieta
1873	Rebecca Cornish	1911	Georgina Johanson
1874	Number not used	1912	Number not used
1875	Peter Kelly	1913	Soo Balbi
1876	Rosie Adamson	1914	Avalon Todaro
1877	Name Withheld	1915	Chantal Buslot
1878	Viktoria Vazorka	1916	Name Withheld
1879	Aditya Dave	1917	Name Withheld
1880	Robyn MacDonald	1918	Number not used
1881	Beth Cox	1919	Number not used
1882	David MacDonald	1920	Renuka Coelho
1883	D. Bowen- Saunders	1921	Name Withheld
1884	Karl Augustine	1922	Alana Lowe
1885	Anita Faloon	1923	Number not used
1886	Robyn Astby	1924	Ruth Weston
1887	Elena Schaller	1925	Trase Brown
1888	Jeremy Thipthorp	1926	Mat Stellino
1889	Name Withheld	1927	Name Withheld
1890	Name Withheld	1928	Name Withheld
1891	Jacqueline Tsimbinos	1929	Confidential
1892	Caroline Turner	1930	Faye Leister
1893	Juliet Green	1931	Gayle Williams
1894	Number not used	1932	Gimasha Botheju
1895	Maria Jiménez	1933	Laura Herndon
1896	Candace Chidiac	1934	Denise Quinn
1897	Name Withheld	1935	Echo Chen
1898	Name Withheld	1936	Number not used
1899	Name Withheld	1937	Josephine Dieni
1900	Name Withheld	1938	Gabi Smalley
1901	Pam Treeby	1939	Hamish Greenall
1902	Nicole Ferrara	1940	John Anderson
1903	Steven Atkinson	1941	Number not used

1942	Number not used	1980	Diane Glenane
1943	Peter Wood	1981	Mariaelena Nobili
1944	Quentin Dresser	1982	Darren Camilleri
1945	Diane Roberts	1983	Lachlan Burnside
1946	Mathew O'Meagher	1984	Louise Mitchell
1947	Confidential	1985	Tara Clark
1948	Katherine Ohanian	1986	Josie Hills
1949	Aditi Basu	1987	Andrew Clark
1950	Sue Litchfield	1988	Diane Paku
1951	Name Withheld	1989	Katherine O'Grady
1952	Asha Persson	1990	Leanne Hurley
1953	Christine Whalan	1991	Kay Myles
1954	Number not used	1992	Leonie Schween
1955	Name Withheld	1993	Fiona Sampson
1956	Number not used	1994	Name withheld
1957	Jessica Constantine	1995	Eliza Fabro
1958	Jeremy King	1996	Stella Braddick
1959	Jacki Jacka	1997	Jo Tibbits
1960	Tania Barat	1998	Samantha Esposito
1961	Lachlan Butson	1999	Leigh Erwin
1962	Andrea Lewis	2000	Peri Ransley
1963	Emma Hakansson	2001	Number not used
1964	Bernadete Shingles	2002	Nischal Bhat
1965	Name Withheld	2003	Shona Macdonald
1966	Stacey Schomburgk	2004	Christine Blakers
1967	Name Withheld	2005	Moi Dunn
1968	Number not used	2006	Tristan Thomas
1969	Name Withheld	2007	Nicolas Duonn
1970	Number not used	2008	Bethany Hook
1971	Julie Smith	2009	Anna Seares and Serena Lera
1972	Fran Grellis	2010	Confidential
1973	Vera Bowen	2011	Number not used
1974	Shaun Hale	2012	Helen Oakley
1975	Rowan and Judith Fowler	2013	Janice Main-Brown
1976	Lee O'Mahoney	2014	Fardin Pelarek
1977	John Bourke	2015	Sherry Macias
1978	Alwyn Rubie	2016	Steve Flounders
1979	Eugene Leden	2017	Himadri Basu

2018	Bernard Gleeson	2062	Raymond Farr
2019	Shannon Whitelaw	2063	Hannah Darnell
2020	Narelle Harbright	2064	Parris Alexander
2021	Gloria Tommy	2065	Kayla Alexander
2022	Karina Leung	2066	Nicholas Ditri
2023	Diane Jones	2067	Maggie Lucas
2024	Julie Taylor	2068	Cara Alexander
2025	Lynn Simpson	2069	Timo Silva
2026	South Aussies for Animals	2070	Daisie Reynolds
2027	David Gillard	2071	Bob Bowden
2028	Sentient The Veterinary Institute for Animal Ethics	2072	Caroline Highfield
2029	Anne Makhijani	2073	Balin Jennings
2030	Janet Dynon	2074	Frank Burke
2031	KT & Associates	2075	Julie Flynn
2032	Pauline Caterall	2076	Ted Howard
2033	Helena Kadlec	2077	Barbara Murphy
2034	Ross Cutler	2078	Julie Guido
2042	Ally Roberts	2079	Lena Bodin
2043	Anthony Bruno	2080	Joshua Jacobz
2044	Name withheld	2081	Harry Miller
2045	Juliete Toyle	2082	Jennifer Hole
2046	Name withheld	2083	Name withheld
2047	Name withheld	2084	Dom Burbidge
2048	Number not used	2085	Jennifer Burns
2049	Name withheld	2086	Cherie Steele
2050	Name withheld	2087	Joanne Tarbuck
2051	Tania Daykin	2088	Steven Phelan
2052	Name withheld	2089	Bronwen Evans
2053	Rey Berkelmans	2090	Jennifer Valentine
2054	Nyssa Hakaraia	2091	Robin Thompson
2055	Willuna Sanctuary	2092	Holi-May Thomas
2056	Sascha Hawkins	2093	Sam Carter
2057	Aruna Manandhar	2094	Kathleen McCaughtrie
2058	Eben Rojter	2095	Justine Iesu
2059	Dilan Fernando	2096	Louise Chambers
2060	Name Withheld	2097	Lucy Weynton
2061	Omri Hussain	2098	Annie Kendall
		2099	Laura Lumachini

2100	Kim McDonald	2139	Ben Williams
2101	Susan Sorensen	2140	Angela Barnes
2102	Traudy Glasencnik	2141	Maureen Grant
2103	Karen Bradley	2142	Erin Visser
2104	Name withheld	2143	Lesley Adamson
2105	Ann Stevens	2144	Wendy Mason
2106	Brenton Powell	2145	Halina Garnys
2107	James Aspey	2146	Sharon Ramsay-Luck
2108	Daniel Jovanovic	2147	Ana Bernedo
2109	Christine Usher	2148	Elke Seeck
2110	Susan Strodl	2149	Jason Caracassis
2111	Name withheld	2150	Susie Hearder
2112	Carolyn Cooper	2151	Patricia Rizzo
2113	Jade Hibberd	2152	Vicki Fairfax
2114	Sue Skelsey	2153	Sharon Bondy
2115	Rebecca Chugg	2154	Susan Metcalfe
2116	Johnathan Rodriguez	2155	NSW Farmers
2117	Gerald Hallead	2156	Celia Smith
2118	Arlie Raffaut	2157	Victorian Farmers Federation
2119	Name withheld	2158	Number not used
2120	Number not used	2159	Cameron Roberts
2121	Name withheld	2160	Zach Mortyn
2122	Mitchell Watso	2161	Chris Anderson
2123	McIntyre Kurt	2162	Jillian McDonnell
2124	Karen Boothey	2163	Michael Van Der Zee
2125	Number not used	2164	Terence Warburton
2126	Number not used	2165	Kristin Hateley
2127	Number not used	2166	Wendy Wolter
2128	Heather Ginges	2167	Cathy Kennedy
2129	Jeff McInnis	2168	Leanne Schilling
2130	Julia Holzknacht	2169	Zeina Jordan
2131	Craig Kleber	2170	Jeff Westbrook
2132	Rheusuin Brown	2171	Sam Kealy
2134	Michael Timmins	2172	Daniel Wills
2135	Reece Mosch	2173	Mathew Bennet
2136	Sabrina Ruscat	2174	Kathy Munn
2137	Laura Podlich	2175	Stacey Dubois
2138	Dimitrios Kailaris	2176	Carol Curran

2177	Chris Spence	2215	Stanley Young
2178	Helen Mulraney-Roll	2216	John Tischler
2179	Sharon Brown	2217	Mel Scot
2180	Diane Janetzki	2218	Anthony Klooster
2181	Judy Giles	2219	Sherry Earl
2182	Peter Hirth	2220	Janelle Petering
2183	Ollie Gladwell	2221	Terrence Hewet
2184	Martin Reither	2222	Caro Hort
2185	Chris Hynes	2223	Debbie Wakefield
2186	Margaret Osborne	2224	Beverly Sharp
2187	Ian Pit	2225	Brad Westhead
2188	Robyn Pike	2226	Leeann Barber
2189	Andrea Castine	2227	Bryce Smith
2190	Nathan Prosser	2228	Mareeta Cox
2191	Sallyann Ison	2229	Marie Furze
2192	Shane Podolski	2230	Heather Butler
2193	Danielle Newberry	2231	Allan Studd
2194	Patrick Thomson	2232	Peter Gitsham
2195	Denise Taverner	2233	Grant Harrower
2196	Ann Dyer	2234	Dianne Bet
2197	Lisa Florence	2235	Monique Argentino
2198	Helen Crafter	2236	Kim Ferrier
2199	Barry Ladd	2237	Margaret Donohue
2200	Lidwina Van Dyk	2238	Sandy Shaw
2201	Wayne Myers	2239	Susan Shaw
2202	Joel Darrington	2240	Peter Brit
2203	Robert Bromley	2241	William Jenkins
2204	Alana Roisseter	2242	Patricia Hill
2205	Peter Wright	2243	Fiona Baxter
2206	Gareth Clark	2244	Michelle Ellis
2207	Angela Wait	2245	Peter Scilini
2208	Angela Matheson	2246	Sarah Ross-Edwards
2209	David Ward	2247	Bridget Bird
2210	Margaret Warren	2248	Thomas Shepherd
2211	Denise McLellan	2249	Rom Konieczny
2212	Susie Malcolm	2250	Alexander Scot
2213	Crag Grinter	2251	Michael Hollman
2214	Robin Ellis	2252	Abbie Wilson

2253	Elaine Forrest	2291	Joan Laity
2254	Doug Gilham	2292	Thea Lenane
2255	Andrew Steed	2293	Mick Ward
2256	Nathan Kirby	2294	Jeffrey Sambell
2257	Ray Clarke	2295	Michael Whiteside
2258	Greg Dunn	2296	Kathleen Thomson
2259	Laurel Cook	2297	Ros Kleinitz
2260	Lisa Tilburg	2298	Peter Vandenberg
2261	Chris Greenwood	2299	Jennifer Neilson
2262	David Crane	2300	John Mckenney
2263	Linda Richardson	2301	Mark Lindsay
2264	Lynda Behan	2302	Martin Tesar
2265	Mathew Stephenson	2303	Craig MacDonald
2266	Michael Davasher	2304	Duncan Grant
2267	Michael Pardew	2305	Heather Ivers
2268	Robyn Pearson	2306	Zoe Crescenzo
2269	Dale Sumner	2307	Nick Brazzale
2270	Jane Griffin	2308	Mick Ouellete
2271	Napier Linda	2309	Sue Ross
2272	Jason Taylor	2310	Bill Wright
2273	Sonya Hanraty	2311	Rick Beeby
2274	Wynne Hobson	2312	Beverly Whitley
2275	Carol Hobson	2313	Tanya Gibson
2276	Deanna Savage	2314	Russell Goodwin
2277	Pauline Harris	2315	Moise Cornea
2278	Robert Puyenbroek	2316	James Arnold
2279	Craig Guthrie	2317	John Arnot
2280	Rosemary Simpson	2318	Shane McBryde
2281	David Mace	2319	Arnold Naylor
2282	Robert Dean	2320	Greg Smith
2283	Elizabeth Bull	2321	Michelle O'Connor-Price
2284	Donna Johnston	2322	Peter Gray
2285	Carl Thomas	2323	Kaye Nothard
2286	Cynthia Phillips	2324	Daniel Corby
2287	Greg Holahan	2325	Daniel Gardner
2288	Carol Johnson	2326	Justin Cook
2289	Trevor Rudge	2327	Philip Small
2290	Lee Bruse	2328	Benjamin Rogers

2329	Mathew Atard	2367	David Charles
2330	Doug Tomkins	2368	Alex Jolly
2331	Jack Speirs	2369	Ian Gougl
2332	Allen Wilkins	2370	Justin Slater
2333	Lorenzo Guizzo	2371	Charles Beale
2334	Travis Smith	2372	Neil Wills
2335	Tom Challis	2373	David Smeaton
2336	Pam Maskell	2374	Paul Knox
2337	Greg Martin	2375	Damien Taylor
2338	Darren Evans	2376	John Fleming
2339	Ben Dew	2377	Brad O'Brien
2340	Rod Prat	2378	Paul Sly
2341	Basset Glover	2379	Peter Taylor
2342	Adam Leeworthy	2380	Andrew Topp
2343	Ian Byrne	2381	James Collins
2344	Michael Monro	2382	Shayne Ringin
2345	Trevor Studham	2383	Dave Weston
2346	John Hyndman	2384	Lewis Bets
2347	Terry Masterson	2385	Kevin Akers
2348	Merv Williamson	2386	Patrick O'Hehir
2349	Audrey Watelet	2387	Peter McKenzie
2350	Dominic Marozzi	2388	Mark Litle
2351	Gary Howard	2389	Mark Grundy
2352	Carlo Zuglian	2390	Jon Williamson
2353	Sebastien Watelet	2391	Michael Deane
2354	Ronald McInnes	2392	Trevor Hobbs
2355	Tony Champion	2393	Paul Mc Donald
2356	Jim Hargreaves	2394	David Murgatroyd
2357	Adam Butler	2395	Julie Smith
2358	Dean Warner	2396	Abby Smith
2359	Joseph Maw	2397	Richard Cimbaro
2360	Adam Cachia	2398	Bradley O'Brien
2361	Lindsay Wright	2399	Maureen Harvey
2362	Tony Noviello	2400	Eileen Purchase
2363	Domenico Bombardieri	2401	Karen Ludlow
2364	Peter Newit	2402	Terry Duff
2365	Derek Postlethwaite	2403	Robert Strybosch
2366	Donald Haywood	2404	Ross Jackson

2405	Michael Wade	2443	Brian Bohan
2406	Geoff Toughill	2444	Kurt Manuals
2407	Harry Kassianou	2445	Melissa Pruden
2408	Jason Sharp	2446	Corrie Avery
2409	Reuel Santos	2447	Chris Barber
2410	Jeanete Rudman	2448	Peter Cashman
2411	Tom Carpenter	2449	Russell Pruden
2412	Mark White	2450	Brendan Myers
2413	Sam Calabrese	2451	Daniel Herchenroder
2414	Gary Jessup	2452	Deborah Phillips
2415	James Wood	2453	Warren Stuart
2416	Grant Thacker	2454	Glen Wat
2417	Michael Wedding	2455	Shirley Kenny
2418	John Desmond	2456	Steve Vojtek
2419	Tony Palmer	2457	Jacques Doucas
2420	Robert Matuch	2458	Michael Gibbs
2421	Graeme Clark	2459	Robert Dewys
2422	Tanya Gibson	2460	Graham Eames
2423	Mark Prascevic	2461	David Evans
2424	Jozsef Toth	2462	Dino Costa
2425	Philip Walter	2463	Roger Ritchie
2426	Mark Wright	2464	Kevin Yates
2427	Chris Gauld	2465	Frank Gaylard
2428	Tania Clissold	2466	Lynete Grant
2429	Ron Crozier	2467	Wayne Hobson
2430	Jody Wallace	2468	Greg Munn
2431	John Dimasi	2469	Ian Vickery
2432	Danielle Lopes	2470	Peter Eilers
2433	Peter Phillips	2471	Graeme Forbes
2434	Rod Berger	2472	Robert Glenn
2435	Martin Bluml	2473	Jenny Stokes
2436	Gary Kealy	2474	Mary Gaul
2437	Giorgio Crevatin	2475	Basil Wagg
2438	Peter Stuart	2476	Jan O'Loughlin
2439	Diane Bets	2477	Daryl Irwin
2440	Paul Micallef	2478	Roger Barbetti
2441	Robert Cuddy	2479	Noel O'Connor
2442	Adam Scot	2480	Eric Taylor

2481	Wayne Lawrance	2518	Glen Renkin
2482	Ross Condello	2519	Bryan Ryan
2483	Brian Harmer	2520	James Empey
2484	Kevin Beadle	2521	Mark Bilney
2485	Joanne Talarico	2522	Darrell Douglas
2486	John Chambers	2523	Kenneth Alford
2487	Gary Andison	2524	Mark Allen
2488	Carmel Natale	2525	David Merry
2489	Rosemary Tidboald	2526	Julie Kelly
2490	Anne Bryce	2527	Todd Murfet
2491	Rob Watkiss	2528	Mark Brumby
2492	Geoffrey Brown	2529	Carole Perkins
2492	Renato Maddalena	2530	Phillip Partington
2493	Nick Ranner	2531	Judy Brown
2494	Adam Jealous	2532	Jonathon Hatfield
2495	Gary Burt	2533	Al Dawson
2496	Sue Mullins	2534	Grant Stoeckel
2497	Wayne Gibbons	2535	Chris Bosco
2498	Paul Lot	2536	Piero Cocco
2499	Darryn Worthy	2537	Shannon McKenzie
2500	Clinton Bodilly	2538	Adam Carson
2501	Rabel Marqus	2539	Jim Leach
2502	Ivan Howes	2540	Jamie Tippet
2503	Laura Conway	2541	Glenn Gribble
2504	Sue Wesney	2542	Sam Brady
2505	Gail Robertson	2543	Geoff Sandman
2506	Melissa Thomas	2544	Lawrence Rees
2507	Merryn Van Bremen	2545	Bernadete Gray
2508	Donald Lomas	2546	Justyne Roscoe
2509	Glenn Falla	2547	Andrew Weklak
2510	Patricia Benham	2548	Andreas Tofari
2511	Russell Bimblecombe	2549	Josie Gallace
2512	Donna O'Shannassy	2550	Dave Townsend
2513	Nando Sari	2551	Steve Clarke
2514	Sean Haslem	2552	Stan Luxford
2515	Geoff Smith	2553	Robert Chapman
2516	Bradley Marriot	2554	Wallace Westman
2517	Peter Anderson	2555	Jeremy Venables

2556	Anthony Thompson	2593.1	Carol Hobson
2557	Russell Griffin	2594	Craig Barden
2558	Chris Niewand	2595	Rosemary Simpson
2559	Andrew Paterson	2596	Paul Roach
2560	Geraldine Sinclair	2597	Mel Elliot
2561	Anthony Moore	2598	Colin Johnson
2562	Desmond Stoddart	2599	Trevor Rudge
2563	Jason Cornish	2600	Michael Whiteside
2564	Mathew Rigby	2601	Fairlie Buterfield
2565	John Taylor	2602	Nick Brazzale
2566	George Karavias	2603	Rick Beeby
2567	Glen Sutcliffe	2604	Lynnete Hammet
2568	Andrew Nunan	2605	Benjamin Rogers
2569	Colin Wake	2606	Jack Speirs
2570	Albert Krohnje	2607	Frank Vella
2571	Ben Horstman	2608	Tony Noviello
2572	Alan Halket	2609	Justin Slater
2573	John Martin	2610	Neville Stewart
2574	Lauren Grassby	2611	Peter McKenzie
2575	Helen Mulraney-Roll	2612	Peter Andrews
2576	Jane Moore	2613	Karen Ludlow
2577	Helen Crafter	2614	Ivy Pahlke
2578	Adrian Jaeschke	2615	Tom Carpenter
2579	David Allwood	2616	Fred Wright
2580	Claire Wetenhall	2617	Klaus Mueller
2581	Grant Harrower	2618	Graham Eames
2582	Michael Harrington	2619	Daniele Skrokov
2583	Kim Ferrier	2620	Daryl Irwin
2584	Sandy Shaw	2621	Paul Tidboald
2585	James Mele	2622	Paul Lot
2586	Wendy Russell	2623	Keryn Gibbs
2587	Robert Forrest	2624	Jim Leach
2588	Nathan Kirby	2625	Sam Brady
2589	Rhonda Grist	2626	Andrew Weklak
2590	Linda Richardson	2627	Geraldine Sinclair
2591	Patricia Trinder	2628	Colin Wake
2592	Sonya Hanraty	2629	Tessa McClure
2593	Carol Hobson		

A.2 Public hearings

Tuesday, 12 March 2024

Davui Room, 55 Saint Andrews Place, East Melbourne, 3002

Name	Title	Organisation
Dr Bidda Jones	Co-Founder and Director, Strategy	Australian Alliance for Animals
Dr Jed Goodfellow	Co-Founder and Director, Policy and Government Relations	Australian Alliance for Animals
Chris Delforce	Founder and Executive Director	Farm Transparency Project
Harley McDonald-Eckersall	Strategy and Campaigns Director	Farm Transparency Project
Paul Bevan	Founder and Chief Executive Officer	Magic Valley
Pam Ahern	Founder and Director	Edgar's Mission
Glenys Oogjes	Chief Executive Officer	Animals Australia
Shatha Hamade	Legal Counsel	Animals Australia
Dr Stephanie Hing	Research Lead	Animals Australia
Lisa Ryan	Regional Campaigns Manager	Animal Liberation NSW

Wednesday, 13 March 2024

Davui Room, 55 Saint Andrews Place, East Melbourne, 3002

Name	Title	Organisation
Margo Andrae	Chief Executive Officer	Australian Pork Limited
Dr Rebecca Athorn	Manager Production Innovation	Australian Pork Limited
Dawson Bradford	Producer Director	Australian Pork Limited
Tanya Pittard	General Manager, Policy and Industry Relations	Australian Pork Limited
Tim Ryan	General Manager, Industry Affairs	Australian Meat Industry Council
David Wright	-	Pork Producer
Tim Kingma	-	Pork Producer
Edison Alvares	Chief Operating Officer, Pork Division	JBS Australia Foods/Rivalea
Dr Rebecca Morrison	Research, Innovation and Animal Welfare Manager	JBS Australia Foods/Rivalea
Dr Cherie Collins	General Manager, Pig Operations	JBS Australia Foods/Rivalea
Olga Alexandratos	Director-Corporate Communications	JBS Australia Foods/Rivalea
John Berry	-	JBS Australia Foods/Rivalea
Dr Robert van Barneveld	Chief Executive Officer and Managing Director	SunPork Group

Name	Title	Organisation
Dr Darryl D'Souza	Executive General Manager, Technical Services	SunPork Group
Kenton Shaw	Executive General Manager	SunPork Group
Dr Kirsty Richards	Manager, Industry and Government Liaison	SunPork Group
Dr Kate Plush	Science Technology and Adoption Manager	SunPork Group
Judy Croagh	Chief Executive Officer	Western Plains Pork
Martin Clark	-	Murnong Farming
Emma Germano	President	Victorian Farmers Federation
Charles Everist	General Manager	Victorian Farmers Federation
Brendan Tatham	Chief Executive Officer	Victorian Farmers Federation

Tuesday, 26 March 2024

Davui Room, 55 Saint Andrews Place, East Melbourne, 3002

Name	Title	Organisation
Dougal Purcell	Acting Chief Executive	Agriculture Victoria
Katherine Clift	Executive Director, Biosecurity Victoria	Agriculture Victoria
Trevor Pisciotta	Executive Director, Animal Welfare Victoria and Agricultural Regulatory Policy	Agriculture Victoria
Michael Coffey	Chief Executive Officer	PrimeSafe
Alison Stone	Chair	PrimeSafe
Rebecca Cook	Head of Prevention	RSPCA Victoria
Mhairi Roberts	Policy and Advocacy Manager	RSPCA Victoria
Dr Yvette Pollock	Past President of the AVA Pig Veterinarians Special Interest Group	Australian Veterinary Association
Dr Kate Savage	-	Australian Veterinary Association
Dr Andrew Morris	President of the AVA Pig Veterinarians Special Interest Group	Australian Veterinary Association
Dr Melanie Latter	National Manager, Policy and Veterinary Science	Australian Veterinary Association
Dr Chris Richards	Managing Director	APIAM Animal Health
Dr Kate Savage	Veterinary Consultant	APIAM Animal Health
Dr Tony Peacock	Chair	Australasian Pork Research Institute Ltd.
Dr John Pluske	Chief Executive Officer and Chief Scientist	Australasian Pork Research Institute Ltd.

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Name	Title	Organisation
Professor Paul Hemsworth	-	Animal Welfare Science Centre, University of Melbourne
Tammi Jonas	-	-
Dr Claire O'Brien	-	University of Canberra

Extracts of proceedings

Chapter 1

Ms Broad moved, that in section 1.2.2, the text:

This would indicate that even amongst people who approve of the killing of animals for food, they are concerned about any suffering by the animals and would be prepared to pay more if they could be assured that the suffering of the animals is minimised

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.2, the following text be inserted:

The Committee acknowledges that CO2 represents the world's best practice and that no other viable alternatives currently exist. Nevertheless, the pork industry remains committed to continue conducting industry-funded research into this area.

Insert quote directly after from Margo Andrae, CEO of Australian Pork Limited:

Over the last decades APL has invested more than \$23 million of producer money into animal welfare research alone, adding to the tens of millions invested by organisations such as Pork CRC and the Australasian Pork Research Institute. We seek out new science and new ways of working to continually improve the way we look after our people and our pigs. Through rigorous research, ongoing education and the implementation of best practice, we aim to ensure the humane treatment of pigs at every stage of their journey from farm to table.

Ms Terpstra moved an amendment to the amendment, that only the quote from Margo Andrae be inserted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Terpstra	Ms Purcell
Mr McIntosh	Ms Copsey
Mr Berger	Ms Crozier
	Mr Welch
	Ms Broad
	Ms Deeming

The question was negatived.

The question was put on the original motion.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.2, the text:

More than 80% of respondents said they were aware of, or had witnessed footage or images of stunning methods on pigs prior to slaughter and a substantial majority (74.74%) said they did not believe that the practice reduced the pain and suffering and distress of the animals. These figures include those that do not support the killing of animals for food for humans. It is unknown whether footage shown on 7.30 on the ABC had any influence on these views or on the high percentage of people who knew of the practice.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.2, the text:

On the issue of the confinement practices within the pork industry, results were again 106 unequivocal. More than 90% of respondents indicated that they were aware of, or had witnessed footage or images of the confinement methods used on pigs in Victoria. The vast majority of respondents did not consider that the current confinement methods promote positive welfare outcomes for pigs.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.2 , the words:

Because of the self-selecting nature of respondents the Committee does not ascribe the views expressed to the wider population and makes no findings in relation to the survey.

be deleted and replaced by the words:

The largest volume of survey responses was from metropolitan Melbourne where there is limited interaction with agriculture, almost half of the responses were from outside Victoria who are outside the scope of the inquiry. Additionally, there was a higher rate of responses from vegans and vegetarians which resulted in a bias in the final survey results.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
Ms Crozier	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the words “as can be seen by the survey results” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the following text be inserted at the beginning of the sentence: “for these groups, therefore...”

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the words “ultimately death” deleted and a full stop be added after “lives”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the words:

The comprehensive list of actions that constitute cruelty can be found in the Act. However, the list does not apply to farmed animals as they are exempted by a later section of the Act. These issues are discussed in detail in Chapter 3, which examines the legislative and regulatory framework which underpins welfare issues for animals. Suffice to say that POCTA is considered by a number of contributors to this inquiry as of little value in protecting the welfare of farmed animals.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the word “issues” be deleted and replaced with “definitions” and the words “Suffice to say that POCTA is considered by a number of contributors to this inquiry as of little value in protecting the welfare of farmed animals” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the words:

Suffice to say that POCTA is considered by a number of contributors to this inquiry as of little value in protecting the welfare of farmed animals. While definitions of cruelty can vary according to these very different perspectives, it is reasonable to assert that no submitters or witnesses to this inquiry overtly or explicitly supported cruelty to animals

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the words:

Some of the pig farmers the Committee heard from see the care for their pigs as a business decision but that does not mean they do not care about the animals

be deleted and replaced by the words:

All pig farmers the Committee heard from prioritise the welfare of the animals on their farms, adhering to current legislation, guidelines, and APIQ accreditation to ensure the best animal welfare outcomes

and that the following words be inserted:

Victorian Pig Farmer, Tim Kingma said during a public hearing:

Having farmed animals since childhood, the first consideration we have is for the health and welfare of our animals.

Judy Croagh, from Western Plains Pork during a public hearing said:

... I do know that every pig farmer I have ever met cares deeply about their pigs and is dedicated to what they do.

Judy Croagh also said:

Every day I come to the farm to work alongside some amazing people who care deeply about the pigs, the environment and the community we work with (page 50 of transcript).

Edison Alvares, CEO of JBS Australian Pork Division said:

We take animal welfare very seriously. We are focused on the sustainable production of pork, which includes an uncompromising commitment to animal welfare for every animal under our care every day.

Ms Terpstra moved an amendment to the amendment to the effect that there be no deletion of text but that the quotes be included.

The question was put.

The Committee divided on the amendment.

Ayes	Noes
Ms Terpstra	Ms Broad
Mr Berger	Ms Crozier
Mr McIntosh	Mr Welch
	Ms Purcell
	Ms Deeming
	Ms Copsey

The question was negatived.

The original question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the words:

However, while it is clearly in his businesses interests for the pigs to be cared for, he outlined for the Committee some of the practices that he adopts on his farm. He said:

We rely on the nutritionist. Our vet is there every two months. Any issues, they are there within a day. Pigs are much like us as humans. They get a cold, they get viruses, all that sort of stuff, so it is utmost that we look after the health of them. I heard earlier about nipping teeth and tails. We do not do any of that. Our pigs are bred free range. They are out in the mud. We take them at 21 days, 22 days old into a straw-based ecoshelter where they are fed and looked after, and from there when they get to about 10 weeks of age we then take them up to a bigger grow-out at Bridgewater where they have got more space.

be deleted and replaced by the words:

Victorian pig farmer, Tim Kingma outlined some animal welfare practices on his farm:

I have been working on our family farm for 20 years. I think the relationships we have are some of the biggest changes. You know, with your farm vet, you are not seeing them once a year, which happened 20 years ago, you are talking to them weekly. Your key staff will ring straight directly to the farm vet. I would imagine as farms get bigger they employ their own veterinarians as well. We are only a family farm, so we are not that big. So it is those relationships, but then it is relationships in all other aspects as well of the business. For me, my parents bought the farm in the 90s, which was actually a bankrupt piggery, from the bank, and we just continually invest in new technologies. We see what is going on in the rest of the world and try and adapt it back here. We have climate control. I have just come off four days of virtually high 30s every day, and the sows in our farrowing sheds sat at 28. I think 28.7 degrees was the hottest they got to. That is why I say for what we are doing animal welfare is number one, and we invest and keep reinvesting, knowing animal welfare is our number one, because if you do not do it, you are not successful.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.2.4, the words:

Notwithstanding for some welfare groups the killing and eating of animals in itself is cruelty, this is not a universally held position. It is largely the process is involved in the slaughter of animals for food that has been the focus of much of the evidence given to the committee

be deleted and replaced by the words:

Most animal welfare groups that gave evidence believe the pig industry should be shut down entirely

and insert the following quotes:

Chris Delforce from Farm Transparency Project when asked by a committee member if he wanted to end meat and livestock production for human consumption stated:

Absolutely (page 18 of transcript).

Chris Delforce then went on to say:

Ultimately, we do not believe that pigs should be bred, raised and killed for food. We do not believe it is necessary... (page 13 of transcript)

Chris Delforce when asked if his view was whether the chicken, beef, lamb and fish industries should also be ended he said:

Yes, it is. From what I have seen in the more than a decade that I have been investigating all these industries, they are all inherently cruel and I think not in alignment with most Australians' values.

When asked what would stop Mr Delforce from illegally trespassing on farms, his response was:

It would be at the phasing out of the industry. I mean, we have said that CO2 is not the only bad way to do things, it is all bad. If CO2 is phased out, we will focus more on how bad the alternatives are. (Transcript, page 22).

Lisa Ryan from Animal Liberation when asked if she wanted to see pig farming banned responded:

Yes. Animal Liberation is an animal rights organisation, as I outlined in our statement. It does promote a vegan lifestyle.

Pam AHERN from Edgar's Mission also said:

... My dad used to say to me, 'You know, Itsy, what if everyone stops eating meat overnight – what are you going to do with all the animals?' This was probably 40 years ago, and I said to my dad, 'Well, it's not going to happen.' But now we are actually having conversations where potentially it could happen, but we have phase-out periods. We have governments that can support these people. I mentioned the Farms Transition Project to help farmers to transition out of animal-based agriculture into plant-based agriculture. So it is not going to happen overnight, as

much as I wish it would, but I think the writing is on the wall that these things are starting to happen.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsy

The question was negatived.

Ms Broad moved, that in section 1.2.4, the words:

In a response about perspective differences between vegetarians and meat eaters and if 170 views about animals suffering are tied to a belief that we should not eat meat , Ms Shatha Hamade of Animals Australia said:

That is not true. That is really not true, because what you are effectively saying is that if you eat meat you agree that piglets should have their tails cut off and their teeth removed without anaesthetic. These things are not mutually exclusive. People that eat meat care about animals. What they do not accept is what you are seeing happening in current husbandry and killing practices in the pig industry. It is not right, and that is offensive to people that eat meat. We looked at the submissions that came through – countless submissions – by meat eaters who are not accepting of what is going on and who are demanding change and evolution. It is not an us and them.

Mr Jed Goodfellow of Australian Alliance for Animals, an animal welfare charity which 181 was established in 2022 to bring together six of Australia’s leading animal protection 182 organisations, told the Committee that:

it is the routine and legal practices that cause the greatest quantum of suffering to animals. These include extreme confinement systems which prevent these intelligent, inquisitive and sentient animals from even be able to turn around let alone engage in any kind of normal behaviours and the various bodily mutilations such as tail docking, castration, teeth clipping and ear notching undertaken without any form of pain relief.

Mr Goodfellow suggested that these concerns were in no way restricted to the 189 vegetarian/vegan population but that:

Australians care about animal welfare, and they do not agree with practices that cause distress and suffering to animals. Poll after poll, survey after survey, has shown that Australians oppose such practices, so there is clearly an evident gap here between what the law permits on the one hand and what the community expects on the other.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.3.1, the words:

Issues raised in the 2020 inquiry into the impact of animal rights activism on Victorian agriculture

The Inquiry into the Impact of Animal Rights Activism on Victorian Agriculture tabled its final report in February 2020.

This inquiry focused on the effectiveness of legislation and other measures to prevent and deter activities by unauthorised persons on agricultural and associated industries, most commonly trespass by animal activists on farms to film and publicise what they saw as cruel practices. The Committee's report considered the three main methods animal rights activists use to search for evidence of animal cruelty and publicise what they find, including:

- 'Open rescue'
- Covert actions
- Overt actions.

It also undertook an analysis of the motivations that drive the activists to trespass on farms and other animal processing facilities. The report considered whether the actions of activists should be considered a form of civil disobedience, what impact the actions of the activists had on farms and other businesses, what was the nature of the divide in attitudes to animal production methods between urban and rural communities and how effective is the legislation and enforcement regimes in relation to animal activists actions and animal welfare issues. The report also covered in some detail the issue of biosecurity risks posed by the illegal trespass on farms and made a number of findings and recommendations regarding this issue.

The Animal Activism report made 15 recommendations and 12 Findings. Recommendations included that the Victorian Government consider the implementation of closed-circuit television cameras (CCTV) in Victorian abattoirs, and that it conduct an examination of alternative practices around the use of blunt force trauma on pigs. The report also made recommendations concerning the general standards in animal welfare, which would address a range of issues of concern in this report, including tail docking and teeth clipping without pain relief.

The inquiry was thorough and involved more than 500 submissions and hearings were held over several months, in both Melbourne and across regional Victoria. The report can be accessed at: <https://www.parliament.vic.gov.au/49498f/contentassets/184245b7cfef487b9e24cfd01302f172/inquiry-into-the-impact-of-animal-activism-on-victorian-agriculture.pdf>.

While this Pig Welfare report touches on some of the same issues as the Animal Activism inquiry, it is more focused on specific areas of pig welfare and it is not the Committee’s intention to re-prosecute the previous inquiry. There may be some repetition but the issues of pig welfare specifically are the main concerns of the Committee in this inquiry.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.3.1 on page 9, the words:

However, the Committee considers that steps should be taken to make them unnecessary to ensure transparency in the industry. In the Committee’s view, mandatory should be placed in all processing and farming facilities and the footage should be audited to ensure compliance with animal welfare requirements. The issue of mandatory CCTV is considered in greater detail in Chapter 3.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 1.3.2, the words:

FINDING 1: Whilst trespass remains a biosecurity risk there are no recorded incidents within Victoria where animal activists have harmed agricultural biosecurity.

The Committee understands that the illegal trespass on farms and meat processing facilities does represent a biosecurity risk. However, as this issue was covered in detail in the previous inquiry and is not within the terms of reference of this inquiry, it does not make any findings or recommendations here. The issue is instead addressed indirectly later in the report in discussions about transparency within the industry. It is the Committee's view, and one that is supported by the activists who undertake the illegal trespass activities, that the use of CCTV in farms and abattoirs, and the appropriate access to the footage from that CCTV, would obviate any need for trespass and would resolve the issue of biosecurity risks from illegal trespass.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that all of Section 1.4 be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, that in section 1.4 in Recommendation 1, the following text be inserted:

After the word Government, omit “commit funding to support” and include the word “recognises”. Delete the words “the development and implementation of” and insert words: “the development of the”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Ms Terpstra	Ms Crozier
Mr McIntosh	Mr Welch
Mr Berger	Ms Deeming
Ms Copsey	

The question was agreed.

Chapter 2

Ms Broad moved, that in section 2.1, the words:

Such an analysis is relevant to this inquiry for two reasons. First, accounting for such changes helps account for the of Victorian consumers and Victorian farmers implicated by the animal welfare issues examined in this report. ‘Second, increasing pork consumption and production have been accompanied by significant changes in farming, husbandry and slaughter practices with the shift from small scale and free-range pig farming to large scale intensive, indoor farming. The Committee received considerable evidence – detailed in later chapters – highlighting the relationship between changes in farming size, husbandry practices and animal welfare.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 2.2.1, the words “which is high volume and low value transaction” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 2.5.1, the words “Intensive production systems expose pigs to various stress factors, preventing many from experiencing higher standards of welfare” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 2.5.1, the words:

Historically, pigs were farmed as an additional source of income in the dairy and grain 730 industries, but pig farming has since evolved into its own industry including intensive 731 farming methods. The shift towards intensification, industrialisation, and specialisation 732 has had a large impact on the industry, changing the way society views farming and the 733 relationship we have with farmed animals

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 2.5.2, the words:

We also do not really have much choice in terms of our access to our abattoirs in Victoria and the other states also. The consolidation of the industry has meant less and less options for small-scale farmers to choose where we conduct slaughter, so our pigs are stunned with CO2 and we do not like that method. I have worked in the abattoir because of doing my meat inspection training, and I have seen distressed pigs in that setting

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that the section entitled “Small holders v broadacre” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.**Chapter 3**

Ms Broad moved, that in section 3.2.1, the words:

In evidence to the Committee, the Farm Transparency Project made the point that the 818 POCTA does not protect farmed animals. In a public hearing, Mr Chris Delforce told the Committee that:

The POCTA itself I think essentially forbids cruelty. The issue is that we have these codes of practice that then say, 'Okay, here's all the kinds of cruelty you can legally do.' The other thing is that POCTA does not cover slaughter. That is the Meat Industry Act, which relates to AS 4696, the federal standard, which basically also says that all animals must be slaughtered with no unnecessary pain, suffering et cetera, and arguably gas chambers are not in line with that standard

be deleted and replaced by the words:

Dougal Purcell, Acting Chief Executive for Agriculture Victoria stated during a public hearing:

... in the regulatory framework that covers Victoria's pig industry, a core Act is the Prevention of Cruelty to Animals Act and its supporting regulations. This code sets out the main laws for the protection of all animals from cruelty in Victoria. Importantly, for the sake of this inquiry, the Act applies to all stages of production up to the point of slaughter. The actual act of slaughter is exempt from the Prevention of Cruelty to Animals Act if the requirements of the Meat Industry Act or other relevant Commonwealth Acts in export facilities, such as the Export Control Act, are complied with. More detailed standards for the care and treatment of pigs are set out under the Victorian Standards and Guidelines for the Welfare of Pigs.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.2.5, the words “However, in practice, this is carried out by Agriculture Victoria” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that the entire section entitled “Section 3.3 Self-regulation of the Victorian pork industry” up until 3.3.1 be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.3.1, the words:

Industry’s role in the development of legally enforceable standards

Many stakeholders described Victoria’s animal welfare laws as simply giving force to standards, guidelines and codes of practice designed by the pig industry. Sonja Ristevski, for example, contended that because “[n]either state nor federal legislation specifically defines “best practice”” in relation to the welfare of pigs:

This ... permits the methods used to confine and slaughter pigs to be decided by the same industry that profits from killing them as efficiently as possible. There is no oversight nor input from independent experts whose primary focus is the welfare of the pigs. How does this not indicate an unjust conflict-of-interest?

Federal/ State Agricultural authorities are simply ‘ticking off’ the current methods used to farm and slaughter pigs. The same Departments are promoting the high productivity and profit by the pig industry. Again, a clear conflict of interest

be deleted and replaced by the words:

Dougal Purcell, Acting Chief Executive for Agriculture Victoria reinforced during a public hearing that the pig industry is not self-regulated, and it operates under a number of mandatory regulations:

I highlight these various regulatory instruments to emphasise that Victoria’s pig industry is not self-regulated; there are a number of mandatory regulations that this industry aligns with.

Australian Pork Limited’s submission also states:

The industry is highly regulated with numerous checks and balances in place to ensure all aspects of the industry meets high standards. In addition to animal welfare, this encapsulates legislation relating to biosecurity, workplace safety and planning and the environment. In addition to the compliance and enforcement regime undertaken by State and Federal Government, the Victorian pork industry has implemented voluntary industry standards to support its strategic goal of being a leader in the care and welfare of pigs

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.3.1, the words:

Despite this consultation process, Animals Australia explained that, during the development of the Model Code:

most issues were not even adequately discussed and the draft Model Code was finalised by the Animal Welfare Working Group ... not the Code Review Reference Group (including Animals Australia and RSPCA Australia). As we formally stated to the Co-ordinator of the Code Review at the time, Animals Australia did not 'sign off' on the current Model Code because it allowed cruel practices (e.g., sow stalls, farrowing crates, and invasive procedures without anaesthesia or analgesia) to continue.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.3.1, the words:

Although the Standard was issued in draft form for comment, during which time it engaged expert individuals, it does not purport to have engaged animal welfare organisations. This reflects the fact that the Standard's primary objective is ensure the safety and wholesomeness of meat products, as opposed to animal welfare

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.3.1, the words:

Likewise, the creation of the Australian Meat Standard involved the engagement of expert individuals. Notwithstanding this engagement, the Committee notes that these processes also appear to have involved significant contributions from the pig industry itself—i.e., the industry for which these documents set standards and guidelines. Because of this, the Victorian pig industry has an undue influence on these practices. The pig industry’s involvement in the enforcement of these and other standards is considered in Section 3.4 below.

FINDING 3: The pig industry plays a significant role in the development of legally enforceable animal welfare standards, giving rise to the perception that it is self-regulated.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4, the following text be inserted after “veterinarians”:

91% of commercial Australian pig farmers are accredited through the Australian Pork Industry Quality Assurance Program (APIQ).

This accreditation requires independent annual audits by third party auditors, AUS-MEAT, and mandates six-monthly internal audits. (page 56 of transcript).

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4.1, the words:

Conflict of interest

According to the Department of Energy, Environment and Climate Action’s most recent annual report, Agriculture Victoria supports the ‘agriculture, food and fibre sector’, for example by ‘working with community and industry to enhance productivity’ and ‘improve animal welfare’.

The Committee heard from many stakeholders that, despite being one of the principal regulators for pig welfare in Victoria, Agriculture Victoria’s responsibility to enhance productivity conflicts with its responsibility to improve animal welfare.

Lucy Thornton, for example, contended that there is an:

obvious structural problem when the government entity that oversees the interests of animal farming industries is also tasked with oversight of animal welfare. This is a clear conflict of interest, and the rights of animals will always lose out. Animals have little to no voice in this current framework, as the government is not able to effectively monitor or enforce the standards.

Arguing that ‘[t]he current regulatory framework is failing pigs and their welfare’, Leigh Hornsby likewise claimed that:

There is such a massive conflict of interest when the authority responsible for the pigs welfare is also the same authority that is promoting productivity and profits.

This concern about the Departments’ conflicting interests was echoed in numerous other submissions, and accompanied by calls for an independent body to monitor compliance with animal welfare laws and standards. This is considered in greater detail in Section 3.7.2.

Be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4.2, the words:

It recommended, in light of this, that the Committee recognise ‘the substantial the substantial State and Federal regulatory frameworks and industry frameworks which the Victorian pig industry operates within’

be deleted and replaced by the words:

The committee acknowledges the comprehensive state and federal regulatory frameworks, as well as the industry frameworks, that govern the Victorian pig industry, and recognises their success in ensuring good animal welfare outcomes.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4.2, the words:

As with APIQ[✓], the Committee received evidence from stakeholders that questioned the efficacy of programs like the AAWCS.

Ellie Rodes suggested that ‘[t]he reliance on schemes like the [AAWCS] supported by industry groups may compromise the objectivity and effectiveness of enforcement,’ and called for the Government to:

Discontinue reliance on industry-backed certification schemes, such as the Australian Livestock Processing Industry Animal Welfare Certification System (AAWCS), and establish a robust, independent oversight mechanism. This will mitigate conflicts of interest and provide an impartial assessment of compliance.

Noting ‘the apparent breaches of standards exposed by the Farm Transparency Project’, Fiona Bannister contended that ‘[t]he outsourcing of enforcement to industry-backed certifications, such as [AAWCS] needs thorough reconsideration’.

Arguing that ‘enforcement often relies on industry self-monitoring and certification schemes like the AAWCS, supported by the pork and meat industry bodies’, Adid Basu questioned ‘the effectiveness of such self-regulation, particularly in light of past promises like the industry-led sow-stall phase-out that have faced criticism for incomplete implementation’

Be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4.2, the words:

The Australian Veterinary Association's Melanie Latter recommended the use of dedicated veterinarians or animal welfare officers on domestic abattoirs:

We have observed that having a veterinarian at an export abattoir or a dedicated animal welfare officer we feel does tend to raise the standards of animal welfare oversight, and we recommend that that is also in place at domestic abattoirs.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4.2, the words:

Conclusion

As outlined in the next Section, there are numerous issues with industry self-regulation when it comes to the enforcement and promotion of animal welfare standards. The Committee recognises the dangers of relying on the industry to regulate itself and emphasises the need for Victorian legislation to mandate higher welfare standards.

Be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4.3, the words:

Increasing transparency in the audit process

Despite the work of Victoria’s regulatory bodies—and despite Victorian pig industry’s efforts to self-regulate beyond the minimum standards prescribed by law—there are numerous issues with the state’s regulatory and auditing processes, particularly in relation to transparency.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4.3, the words:

Permitting unannounced, ad hoc inspections of facilities

Animals Australia’s Glenys Oogjes told the Committee that ‘regulators ... are not well resourced these days’, and that ‘the industry’s own [quality assurance] programs are there ... but again, they are only based on the current codes, which are, as we have indicated, inadequate standards’.

The other issue is of course that they are being audited, and the audit results, if you like, are with APIQ. It is not transparent. It is not a publicly available test, if you like. It

is also a real concern with APIQ, for example, where there is no notice given of audits. I understand this is something that happens of course, but I have sadly learned from whistleblowers what happens before an audit – when everything is fixed up, when they know that they are coming on a certain day. So it does not give us confidence, and that takes us back to the very discussion we had very early on. The public, the community and I cannot have a lot of confidence in what is happening when you cannot see what is happening.

Jed Goodfellow, Co-Founder of the Australian Alliance for Animals, told the Committee that there is no transparency around Victorians' enforcement scheme, and called for POCTA Inspectors to be able to perform unannounced inspections:

We do not know who is conducting inspections, how often those inspections are conducted or what the results of those inspections are. There is limited to no transparency around that compliance monitoring system. My understanding is that in Victoria, under the current Prevention of Cruelty to Animals Act, there is no power for engaging in unannounced inspections to conduct audits of facilities, whereas that power does exist in other states and territories. That would be certainly something we would encourage committee members to consider, to create a more robust arrangement for on-the-spot inspections, but also for whatever the relevant department is – Agriculture Victoria – to be more transparent about providing information relating to those compliance monitoring activities on their website so that people can see that there is actually a system in place that is being operationalised and enforced.

Farm Transparency Project's Chris Delforce also recommended that regulatory bodies be given the power to perform 'unannounced inspections', as well as 'the ability to seize footage immediately and review it'.

The Committee understands that PrimeSafe conducts unannounced, ad hoc inspections of livestock processing facilities. However, the same does not appear to be true for Agriculture Victoria under the Prevention of Cruelty to Animals Act.

FINDING 4: In light of concerns around the transparency of Victoria's regulation and audit processes, inspectors under the Prevention of Cruelty to Animal Act and Livestock Management Act should be given the power to instigate unannounced and ad-hoc inspections.

RECOMMENDATION 2: That the Victorian Government grant welfare inspectors the power to instigate unannounced and ad-hoc inspections of facilities.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.4.3, all words from “Mandating closed-circuit television” to the words “independent biannual audits” before the heading “3.5 The Chimera of ‘best practice’”

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, in Recommendation 3 delete the word “external” and include the word: “regulatory”. After the word independent, delete the word “biannual”. Amend the word “audit” to now read “audit(s)”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Terpstra	Ms Broad
Ms Purcell	Ms Crozier
Mr McIntosh	Mr Welch
Mr Berger	Ms Deeming
Ms Copsey	

The question was agreed.

Ms Broad moved, that in section 3.5, the words “The Chimera of” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.5, the words from “Regarding whether Victoria’s” to “confinement are pretty much universal” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.5, the word “slaughter” be deleted and replaced by the word “processing”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.6.1, the words from “The Committee heard from animal welfare groups” to “Welfare Standards and Guidelines process.” at the end of line 1957 be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.7, the words “Acknowledging that the Government intends” to the words “applying the same national standard.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.7.1, the words:

Opportunities for the new Act

The Committee received a considerable number of submissions praising the Bill’s acknowledgement of animal sentience and calling for the Pig Welfare Standards to do the same. However, it also received evidence for how the Act could be improved upon.

Be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.7.1, the words from “Reinstating decision-making principles” to “standards and guidelines in Victoria” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 3.7.1, the words “Empowering an Independent Office of Animal Protection” to the words “animal welfare conditions within Victoria.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Ms Crozier	Ms Terpstra
Mr Welch	Mr McIntosh
Ms Deeming	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, in Recommendation 6, after the word “Government” include the words “consider the”. Amend the word “establish” to now read “establishment”. Include the word “of” after “establishment”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Terpstra	Ms Broad
Ms Purcell	Ms Crozier
Mr McIntosh	Mr Welch
Mr Berger	Ms Deeming
Ms Copsey	

The question was agreed.

Chapter 4

Ms Broad moved, that in section 4.1, the word “gassing” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.1, the words:

Stunning and bleeding

The process of stunning the pig is followed by a bleeding process known as sticking which is to ensure death prior to the slaughter process and to ensure blood loss to maximise meat quality and must be residual free so it is suitable for human consumption. After unconsciousness has been confirmed following stunning, pigs are bled out by having the major blood vessels in their neck severed using a knife’ be deleted and replaced by the words ‘The process of stunning the pig is followed by sticking which is to ensure death prior to the slaughter process and maximises meat quality.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.1, the words “Pig producers consistently framed welfare issues related to stunning – primarily the stress of human handling – as also having important commercial imperatives.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2, the words “which despite its preference among producers and veterinarians, does involve significant aversive impacts for pigs.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.1, the words:

pigs are not rendered unconscious immediately. As they inhale the gas, their blood-carbon dioxide levels gradually increase and blood-oxygen levels decrease, eventually causing unconsciousness due to loss of brain function.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.1, the words:

The RSPCA report that decreased brain activity following exposure to high concentrations of carbon dioxide range from around 30-75 seconds, however the response time can differ depending on pig genetics, age, reactivity, and stress levels prior to stunning.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.1, the words “The side-loader system is an older design which has been replaced with the improved back-loader system.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.1, the words:

RECOMMENDATION 7: The use of side-loader (single file) carbon dioxide stunning systems must be phased out to minimise pre-slaughter stress in pigs

be deleted and replaced by the words:

The review process of the Model Code of Practice for the Welfare of Animals - Pigs should include an evaluation of side-loader carbon dioxide stunning systems

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.1, the words:

CO2 stunning is considered by the industry to have both welfare and commercial advantages over other pre-slaughter stunning methods. CO2 systems were first introduced in the 1990s as an alternative to electric stunning (see section 4.3), as a less stressful technique for both staff and pigs and providing a higher quality meat

be deleted and replaced by the words:

CO2 stunning is widely acknowledged by experts and scientists to offer significant welfare benefits compared to alternative pre-slaughter stunning methods.'

Edison Alvares, the Chief Operating Officer for JBS Pork Division/Rivalea said during his opening statement at a public hearing that:

This brings me to CO2 stunning, which is a proven method of stunning, best practice worldwide and endorsed by the World Organisation for Animal Health, the global authority on this matter. Although it is not perfect, CO2 stunning is the best and most balanced available method to humanely stun a pig...

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.1, all words from “Aversive impacts of CO2 stunning” to “of pigs having the reaction” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.2, the heading be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.2, the words “This view was supplemented by a large number of submissions (including many pro-forma submissions) received by the Committee” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.2, the words:

Animals Australia told the Committee industry preference for CO2 stunning was primarily a commercial rather than welfare decision, a calculation of “necessary suffering”:

Necessary suffering was ‘Well, how many pigs can I kill in an hour? Can I maximise that?’ for whatever reason, economic reasons et cetera. So what they discovered was that the pig-gassing machines could allow, in the current day, abattoirs that are killing up to 5000 pigs a day through the gassing system. The average is about 3500 a day through the gassing system. This is about economies of scale. Animal welfare plays no part in any of this; this is really just codified cruelty to push out the economies of scale in these intensified industries

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.2, the words:

Mitigation: industry groups

In contrast to animal welfare groups, pig industry representatives and leaders responded that “although it is not perfect, CO2 stunning is the best and most balanced available method to humanely stun a pig

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.2, the words:

This included recommendation that domestic abattoirs to be brought up to the same standard as export abattoirs, with a responsible person overseeing welfare at the site, whether that is a welfare officer or an on-plant vet

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.2, the words:

FINDING 9: Co2 gassing as a method of stunning is aversive to pigs who experience high levels of pain and stress.

be deleted and replaced by the words:

CO2 stunning is currently recognised as best practice and the most viable option, based on extensive scientific evidence. Continuous research funded by the pig industry aims to explore emerging alternatives, ensuring the adoption of any superior techniques in the future.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.3, the words “Given the known aversive responses pigs show to CO2 gassing as pre-slaughter method, research continues to be conducted on alternative gases to conduct controlled atmospheric stunning” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.3, the following text be inserted after “atmospheric stunning”:

Over the past two decades, there have been numerous research projects conducted to find alternative gases to CO2 stunning, but no alternative gases are yet available commercially that provides animal welfare benefits over CO2.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.3, the words:

The aim of this research is to find gases or gas mixtures that induce faster and longer stun times, and less aversive physiological reactions than CO2.

Replacing or mixing CO2 with inert gases (including helium, xenon, argon, nitrogen) is thought to induce a more “gentle loss of consciousness without panic and air hunger”. This is because when inert gases rise in the bloodstream it replaces oxygen, inducing consciousness without CO2 levels rising and avoiding the sensations of air hunger and breathlessness

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.3, the words:

As with CO2 stunning, the pig industry makes both animal welfare and commercial considerations in assessing the viability of alternative gases.

The seriousness with which the industry approaches alternatives to stunning was questioned by some animal welfare advocates. Ms Harley McDonald-Eckersall of the ATP told the Committee in a hearing that

Right now millions of dollars of government funding – taxpayers money – is going to Australian Pork Limited. Despite that, there has not been any sign that they have been putting any of that into investing in alternatives to CO2 stunning, in alternatives for sow stalls and farrowing crates. The industry has remained unchanged for 20 years.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.2.4, the words:

The EU ‘PigStun’ project is an encouraging initiative which seeks to provide non-aversive alternatives to CO2. These include use of alternative gas combinations (e.g. helium and nitrogen), and retrofitting existing stunning systems to allow for inert gases. The benefit of inert gases is that they do not cause breathlessness and air hunger, so the loss of consciousness is less aversive than with CO2.

The project is also looking at ways to improve electrical stunning to reduce pre-stunning handling. Issues such as human safety, availability of gases, affordability of alternate gases and the retrofitting of facilities will need to be addressed for the ultimate research findings to be applied in Australia.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.3, the words “to induce an epileptic seizure” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.3, the words: “As noted at the beginning of the chapter, such handling has significant animal welfare implications, because the handling of pigs by humans causes substantial stress to the animal.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.3, the words “but does not dictate” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.4, the words:

Penetrative captive bolt devices cause irreversible unconsciousness by striking the forehead that extensively damages both the skull and brain of pigs. Pigs are individual handled and restrained as the captive bolt is applied, causing stress for the animal

be deleted and replaced by the words:

Captive bolt guns are considered a non-reversible stunning method that discharge a bolt through the skull of an animal causing immediate unconsciousness

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.4, the words:

Penetrative captive bolt devices cause irreversible unconsciousness by striking the forehead that extensively damages both the skull and brain of pigs. Pigs are individual handled and restrained as the captive bolt is applied, causing stress for the animal

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.5, the following text be inserted: “captive bolts are only used in extremely limited circumstances”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.6, the words:

4.6 Conclusion

The committee understands the reasoning behind the stunning of pigs prior to slaughter. However, the committee also recognises that the process is currently in use highly aversive for pigs. It is clear that current methods of stunning, in particular CO₂ gassing, causes substantial suffering for the pigs prior to their ultimate death.

While it is clear that stunning methods are used that will allow for large numbers of pigs to be processed in a short period of time, thus maximising the economic benefits, it is the committee’s view that alternative methods of stunning must be found. While acknowledging the evidence given to the committee that there is substantial research being undertaken, more needs to be done to fast track alternative approaches to the stunning of pigs. Therefore, the committee considers it is essential that the Victorian government provide funding for further research into alternative methods.

be deleted and replaced by the words:

Approved methods for slaughtering livestock in Australia are grounded in scientific research. There are no current alternatives to carbon dioxide stunning in pigs which

can provide on balance the most humane stunning of animals in most settings. This is due to its ability to effectively manage pig herds, requiring minimal human intervention and thereby reducing stress levels. CO2 stunning is widely regarded as the best practice globally and is extensively employed in Europe, the United States, and Canada. Contrary to calls for its phase-out, submissions from the RSPCA did not advocate for discontinuing CO2 gondola systems. Furthermore, a recent literature review conducted by the New South Wales DPI affirmed CO2 stunning as one of the preferred methods for pig stunning, a sentiment reiterated by the World Organisation for Animal Health. The endorsement of CO2 stunning extends beyond industry voices, with third-party organisations also lending support to its efficacy.’

In its submission, Australian Pork Limited contended that:

Over the past two decades, there have been numerous research projects conducted to find alternative gases to CO2 stunning, but no alternative gases are yet available commercially that provides animal welfare benefits over CO2. The issues reported with alternative gases and mixtures include longer stunning times, shorter stun-to-stick intervals, conflicting results regarding aversion signs, higher cost of gases, difficulty in handling lighter gases than air, and the negative impact on meat quality and the environment.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.6, the following text be inserted after “government provide funding”:

to Australian Pork Limited to assist with the organisations ongoing research into alternative methods.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 4.6, Recommendation 8 be amended in the following terms:

That the Victorian Government allocate funding to Australian Pork Limited to support its ongoing research and development of commercially viable alternatives to the use of CO2 in stunning pigs prior to slaughter, with a requirement to report on these alternatives no later than May 2026.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, that in section 4.6, in Recommendation 8, after the word “Government”, include the words: “work with industry to innovate”. Delete the words: “commit funding into researching and developing”. Include the words: “research and development opportunities to” before the words “commercially”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Terpstra	Ms Broad
Ms Purcell	Ms Crozier
Mr McIntosh	Mr Welch
Mr Berger	Ms Deeming
Ms Copsey	

The question was agreed.

Chapter 5

Ms Broad moved, that in section 5.1.1, the words:

There were a number of contributors to the inquiry who objected to the practices employed in artificial insemination of pigs in the industry. A number of submissions objected to the practice, both on the grounds that it means that sows are pregnant for the majority of their lives and, in some cases, it has been equated to sexual assault of the animals and therefore considered to be bestiality. It is acknowledged that artificial insemination is widespread within the agricultural sector as it increases ‘production’ of animals and therefore the product of the industry. Despite its widespread acceptance within the industry, a number of contributors saw it as ‘invasive and degrading’.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negated.

Ms Broad moved, that in section 5.1.1, the words:

The Committee recognises that artificial insemination is standard practice within the agricultural sector as it increases production levels. However, on animal welfare grounds it is important that all practises in the husbandry of animals within the agricultural sector are proven to be humane and minimise stress to the animals. Such evidence was not provided to the Committee.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.1.1, the following text be inserted:

After “individual farms” insert the following after a comma: “although these health records are routinely maintained and audited as part of the APIQ accreditation process.”

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.1.1, the words “In the Committee’s view, transparency requires these practises to be monitored and reported.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.1.1, Recommendation 9 be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.1.2, the words:

The RSPCA suggested in its submission that a ban on sow stalls would be an expectation in the development of any new standards and guidelines for pigs. In the Committee’s view, the Victorian pig industry should aim to phase out all remaining sow stalls in favour of group housing systems for gestating sows.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2, the words:

There was some doubt expressed by some animal welfare groups about the commitment of the industry to change.

The last data that we have seen published from them was their 2021 annual report, and it was about a four-fifths uptake of the voluntary phase-out. We investigated a number of piggeries in Victoria a couple of years ago. We found six. Pretty much every place that we visited still had sow stalls. At Midland Bacon they have this massive shed full of hundreds of sow stalls, one of the largest that I have seen, and that is still operating today. I believe maybe one or two of the other six have since

stopped using sow stalls, but it is still quite widespread. It seems like the industry has kind of given up on that phase-out, because they have stopped publishing that data.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2, the words from “the industry” to “lactation period” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2, after “indicate that”, remove “a little” and replace with “almost 90 per cent of pork producers have phased out sow stalls”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2, the words “While this is clearly a positive move, it leaves a significant number of stalls still in operation and the committee is very concerned about the welfare implications of this.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2, the words: “Throughout the inquiry, industry representatives have been keen to emphasise the success of this phase out.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2, the words:

On the other hand, animal welfare groups asserted that the phase out was not voluntary or science-led, but forced by pressure from activists and retailers. Glenys Oogjes of Animals Australia told the Committee that

They were forced to do this, and when I say that, they were forced through Animals Australia's campaigns and exposés way back then – that is, in the early 2000s. And it was also because Coles first – and then other supermarkets followed – decided that they would take up that issue. Essentially, if your primary buyers – Coles and Woolies, for example – are moving away from wanting to sell pork that has been produced, if you like, or at least the mothers of the pigs that become the meat were kept in sow stalls, then that is going to shift the dial, and it did. But it was on a voluntary basis, as I say; it had to be forced. They only did it reluctantly.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2, the Finding 10 be deleted and replaced by the words “The Victorian pork industry should be commended for achieving such a high rate of almost 90 per cent of its voluntary phaseout of sow stalls, demonstrating a strong commitment to animal welfare.”

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2, the words from “Regarding the 20 per cent” to “confine sows in sow stalls” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

Ms Broad moved, that in section 5.2, the Finding 11 and Recommendation 10 be deleted and replaced by the following text:

Trevor Pisciotta from Agriculture Victoria said:

The Victorian standards and guidelines for pig welfare set out minimum space requirements for pigs, including those housed in stalls as well as in other accommodation used for different purposes. Specifically, sow stalls can be used in the early stages of pregnancy to reduce risk of miscarriage in the industry from fighting between pregnant sows, and there has progressively been advancement in industry around different methods for managing those risks and therefore reducing the periods of confinement in sow stalls. The Victorian standards and guidelines for pig welfare set out the maximum amount of time that sows can be kept in sow stalls, but my understanding is that common industry practice, as I said, is moving to keep sows in stalls for much shorter periods of time.

FINDING: The use of sow stalls significantly reduces the risk of miscarriage and protects the welfare of the sow in the early stages of pregnancy as they are highly aggressive towards each other.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Ms Terpstra
Ms Deeming	Mr McIntosh
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, that in section 5.2, in Recommendation 10 after the word “stalls”, delete the words: “by 2026.”

The question was put.

The Committee divided.

Ayes	Noes
Ms Terpstra	Ms Broad
Ms Purcell	Ms Crozier
Mr McIntosh	Mr Welch
Mr Berger	Ms Deeming
Ms Copsey	

The question was agreed.

Ms Broad moved, that in section 5.2.2, the words:

According to Animals Australia, existing Codes, Standards and regulations permit confinement in farrowing crates for up to six weeks per reproductive cycle. The Model Code permits minimum farrowing crate dimensions of 0.5 x 2m and a total farrowing crate and creep area of 3.2m². Animal Australia says that the use of farrowing crates is “equivalent of keeping a large (up to 250kg), heavily pregnant (then lactating) animal in a footprint similar to that of a standard bathtub for a month and a half. She can stand up or lie down, but cannot turn around, nor even properly interact with her piglets.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2.2, the words:

Animals Australia estimates it is likely more than 85 per cent of Australia’s 265,000 breeding sows are confined to farrowing crates for between four and six weeks per reproductive cycle – usually a few days or up to a week prior to farrowing, and then three to four weeks before the piglets are weaned. Sows in commercial piggeries are typically bred twice a year for approximately two years (there is an average of

4.8 litters per sow). If bred for twice a year for two years, sows will spend approximately six months – or a quarter of their lifetime – confined in farrowing crates.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived

Ms Broad moved, that in section 5.2.2, the word “while” at the beginning of the paragraph be deleted and amend the sentence to read:

APL and industry experts have a more positive view of the short-term use of farrowing crates as they allow a sow to stand up, lie down, and stretch out, while keeping her piglets safe in a separate section. The crate still allows the sow to nurse her piglets.

Professor Paul Hemsworth from the Animal Welfare Science Centre, University of Melbourne said:

Well, I think sows have got bigger over time, but there has been quite a lot of work done comparing firstly sows in farrowing crates versus unrestrained in pens, with or without enrichment, as well as the effects of those two housing systems. They can vary a lot. The farrowing crates will vary in size, flooring type et cetera, and the farrowing pens will vary in terms of total space and whether or not there is enrichment et cetera.

Professor Paul Hemsworth also stated:

I mean, the issue is that piglet mortality in farrowing pens is generally higher. Farrowing crates have some disadvantages too, but the beauty of farrowing crates is that they reduce live-born piglet mortality generally – that is, piglets dying in the first few days after birth. The farrowing crate in very early lactation probably does not create a great challenge, based on what we have seen in the literature and what we have seen as well, because the sow, normally, in the early part of lactation is fairly immobile. She remains in her nest with the young. It is after three, four, five days that she starts to move out, so that confinement early on is probably not a substantial issue for the sow.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2.2, the words:

Adversive impacts

The RSPCA, Animals Australia and other animal welfare groups report that key animal welfare concerns for sows associated with the use of farrowing crates include:

- severe movement restriction leading to insufficient rest, muscle weakness, and injuries
- increased levels of stress and increased pain during farrowing
- inability to fulfil behavioural needs, such as foraging, nest seeking, and nest building before farrowing
- inability to perform maternal behaviours and initiate social interaction with their piglets.
- lack of agency and ability to choose to move away from the nest and piglets when they need
- increased levels of stress and displays of aggressive behaviours in piglets during weaning.
- malnutrition, due to restricted feeding and chronic hunger due to limited if any roughage
- negative affective states such as boredom, loneliness, helplessness, frustration and depression, and absence of positive affective states such as contentment.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2.2, the words:

Several animal welfare groups presented evidence to the contrary.

Farrowing stalls are justified by industry to reduce piglet mortality, predominantly from squashing. Yet the industry reports an 11.5 per cent pre-weaning mortality rate on average amongst intensively-raised pigs, whereas several of AFSA's members who raise pigs outdoors on pasture report an average of just 10 per cent, belying the need to confine sows in the first place.

According to Animals Australia, the European Food Safety Authority (EFSA) Panel on Animal Health and Welfare has reviewed all relevant information and concluded that comparable piglet survival rates could be achieved with temporary confinement (as few as 3 days) in larger spaces (4.3-6.3 m²) with enrichment (additions to create a more stimulating environment). The majority (80%) of crushing deaths occur within the first 72 hours, and removing confinement on day 3, 4 or 7 can improve sow welfare and manage piglet deaths while maintaining commercial viability.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2.2, the words:

Not everyone in the industry supports the use of farrowing crates. Tammi Jonas, a smaller scale pork producer from Central Victoria, told the Committee that the stalls should be phased out entirely. She said that the stalls don't allow the pigs to turn around, and so they lie down and they stand up and they often carry sores on their back from rubbing up and down those bars. She said in a hearing

We think it is totally inhumane, and we do not think there is any argument for it – especially as, as I said, the pre-weaning mortality in a well-run pastured system is also relatively low. You will always lose some piglets – not in every litter, but across the herd over time – but there is no argument, we think, for confining sows like that as a measure. We think the whole production model needs to change.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2.5, the words:

According to the RSPCA's submission, some of the benefits of outdoor systems include:

- shorter and easier farrowing for sows;
- lower stress levels in sows;
- reduced teat and skin lesions on sows;
- increased expression of maternal behaviours from sows;
- lower stress levels and aggressive behaviours in piglets during weaning

The submission suggested that the negative welfare consequences for sows associated with the severe restriction of movement in conventional farrowing crates are inherent. Alternative farrowing systems that provide sows more freedom to move, where managed appropriately, can provide balanced welfare outcomes to both sows and piglets

be deleted and replaced by the words:

Martin Clark, a pork producer with an outdoor piggery said when discussing issues about outdoor systems:

So we have a higher mortality rate because they are out in the open and that is what happens.

He also said during a public hearing that:

Cats are the biggest issue, because they spread disease, and they are the worst. I think last year we trapped 67 black and white cats. That is the trouble.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2.5, the words:

Animal welfare groups seeking bans on farrowing crates have argued that pigs must be provided with sufficient space to allow them ‘to move freely and perform highly motivated behaviours (e.g. foraging and exploring)’. As stated earlier, the RSPCA has identified close confinement, including the use of sow stalls, farrowing crates and boar stalls, as one of the three key animal welfare issues in pig farming.

It is worth noting that several European countries already prohibit the use of conventional farrowing crates, and the European Union has committed to phasing out their use by 2027. The New Zealand Government has also committed to phase out the use of conventional farrowing crates by 2025.

FINDING 1: The close confinement and isolation of sows within farrowing crates leads to stress, discomfort, poor muscle development and prohibits maternalistic behaviours.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2.5, the words:

FINDING 2: Evidence presented to the Committee indicates that mortality rates in piglets that are confined to farrowing crates are similar compared to those that are pasture raised.

be deleted and replaced by the words:

Evidence received by the committee indicates that the use of farrowing crates significantly reduces piglet mortality. This practice provides a controlled environment that minimises the risk of piglets being accidentally crushed by the sow, thereby improving their chances of survival.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.2.5, the words:

RECOMMENDATION 11: That the Victorian Government support farmers to transition to outdoor group housing.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, that in section 5.2.5, in Recommendation 12 the words “by 2026” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Ms Broad moved, that in section 5.3, the words:

A mature boar is an uncastrated male over 9 months of age. Once a boar reaches maturity they may be kept at a ‘Boar Stud’ where their semen is collected and processed to be used in Artificial Insemination programs. Mature boars are also kept in the mating area of the farm to be utilised as ‘teaser’ boars (to detect sows who are on heat (in oestrus)) or for natural matings.

be deleted and replaced by the words:

A mature boar is an adult male pig that has reached sexual maturity, typically over 9 months of age. Boars used for artificial insemination (AI) are typically housed in specialised facilities known as ‘boar studs’. These facilities are designed to provide a controlled environment for semen collection and processing to be used in artificial insemination programs. Mature boars are also kept in the mating area of the farm for natural matings.

Housing systems that provide boars with more freedom of movement than conventional stalls are encouraged for use, provided that such systems are consistent with management of boar hygiene and operator health and safety requirements. It is recommended that aggressive adult boars are housed individually to prevent bullying

and injury to themselves or their pen mates from fighting. It is noted that boars raised together are less likely to fight and for this reason often boars will be housed in compatible pairs or small groups.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.3, the words:

In its submission to the inquiry, the RSPCA suggested that there is quite limited scientific evidence available about the impact on boars in commercial production systems. However, it is likely that confining a boar in such a small space for its entire adult life is very likely to have the same welfare implications as confining a sow.

It stated that there has been research done that indicates boars can find installs, which severely restrict movement and certain behaviours, developed lower bone mineral density and have associated lameness. Somewhat ironically, given their role in pork production, research has also indicated that boars can find installs have shown to have reduced fertility.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.3, the words:

In the Committee's view, all forms of severe constraint of movement and natural behaviours represents a breach of animal welfare principles and would not be supported by the Victorian community

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 5.3, the words:

RECOMMENDATION 13: That the Victorian Government mandate a complete ban on the use of boar crates, mating stalls and any other restrictive confinement by 2026.

be deleted and replaced by the words:

the housing and management of boars should be considered as part of the development of the new national code.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, that in section 5.3, in Recommendation 13 the words "by 2026" be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Ms Broad moved, that in section 5.4.1, add a full stop after “basis” and delete the words “who don’t use sow stalls at all and who’s approach appears to be significantly more welfare focused.”

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negated.

Ms Broad moved, that in section 5.5, the words:

In the Committee’s view, it is not sufficient to simply say ‘we are different and therefore we can do whatever suits us

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negated.

Ms Broad moved, that in section 5.5, the words:

In the Committee's view, Australia should be at the leading edge of animal welfare in agriculture generally and within the pork industry, in particular.

be deleted and replaced by the words:

In the Committee's view, Australia is leading in animal welfare in agriculture generally and within the pork industry, in particular.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that at line 3319 the words "and public expectations" be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Chapter 6

Ms Broad moved, in the first paragraph of Chapter 6, the words:

In the preceding chapters, the Committee has focused on the key welfare concerns of CO2 gassing prior to slaughter and the confinement of sows. However, a number of other welfare issues have been raised during the course of the inquiry. These include the docking of the tails, clipping of teeth and castration of piglets without anaesthetic, as well as the killing of piglets through the use of blunt force trauma.

Again, as with the other welfare issue covered in this report, opinions differ regarding the level of cruelty inherent in these activities. In the case of tail docking and teeth clipping, there is also some disagreement about whether the procedures are even necessary.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.1, the words

but it has been linked to increased stress and barren environments where pigs are unable to satisfy their behavioural needs

be deleted and replaced by the words

Dr Paul Hemsworth from the Animal Welfare Science Centre, University of Melbourne said during a public hearing:

The fact that we see tail biting in complex environments, like environments where enrichment is provided – you cannot explain tail biting based on boredom in that situation. Outdoor pig production – that is probably not a boring environment for the pig, and indoor systems are not necessarily a boring environment either. I mean, the environment changes regularly, with people coming and going. People are an important part of the environment. Pigs are very aware of people in their environment. Change is occurring all the time; the animals are moving and moving from pen to pen. They are being mixed at times. They are having litters.

Ms Terpstra moved that the amendment be amended such that the text not be removed but the proposed inserted text be inserted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Terpstra	Ms Purcell
Mr Berger	Ms Copsey
Mr McIntosh	
Ms Broad	
Mr Welch	

The question was agreed.

The question, as amended, was put.

The Committee divided.

Ayes	Noes
Ms Terpstra	Ms Purcell
Mr Berger	Ms Copsey
Mr McIntosh	
Ms Broad	
Mr Welch	

The question was agreed.

Ms Broad moved, that in section 6.1, the words “Tail docking of piglets involves cutting the end section of the tail with sharp scissors or a scalpel.” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.1, the words:

Throughout the inquiry, concerns have been raised by a large number of individual submitters about the practice on the basis that it was both unnecessary and that it caused the animals pain and distress.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.1, the words:

This issue was also raised by a number of organisations in both submissions and during public hearings.

Animals Australia, in its submission, suggested that tail docking was of concern as far back as 1965, when the ‘Brambell Report’ raised concerns about intensive pig production including close confinement of sows, tail docking, and high stocking densities. They said that

These concerns are as true today as they were then. In 2023, pigs are not even being treated in a way that is consistent with recommendations made in 1965, let alone in line with twenty-first century animal welfare science and community expectations.

Ms Harley McDonald-Eckersall of the Farm Transparency Project suggested that not only were procedures undertaken without anaesthetic, but they were undertaken by people without the necessary training or qualifications to do it safely. She said

In these crates newborn piglets are subjected to a series of painful surgical mutilations without any kind of anaesthetic or pain relief. Their tails are cut with scissors, their teeth are cut back and chunks are cut out of their ears as a method of identification. These unnecessary procedures are performed not by qualified veterinarians but by untrained farmhands.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.1, after “The practice of routinely performing these surgical procedures is not universally supported within the industry”, insert the following text:

Dr Rebecca Morrison from JBS/Rivalea, who has a PhD in animal science and animal welfare stated during a public hearing:

I will jump in there to confirm that Rivalea/JBS do not practice teeth clipping or ear notching as well, and that is under our veterinary direction. Again, we cannot speak for what happens on other farms. They may have a different health situation or have different veterinary guidance that requires them to do it. But our position is no teeth clipping.

Dr Rebecca Morrison also stated:

Just in summary, we are committed to continuous improvement in this space and investigating pain relief where it is effective, it does not cause additional stress and it is also safe for our people to use as well, which is really important. We are an important stakeholder in this whole situation.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.1, the words:

Ms Tammi Jonas, a small scale farmer in Central Victoria, told the Committee that in her view, the reason for tail biting, which is the justification for the procedures being

required, is the way the animals are housed which cause the distress that leads to the behaviour. She said in a public hearing that

I actually would also argue that the tooth clipping and the tail docking should not be required. In a healthy production environment there is no need to be doing those things. We have heard of students being taught in some of the veterinary courses – we have had vet students here, and I will not say what universities – that pigs, even in outdoor systems, must have their teeth clipped and their tails docked, and we do not know a single pasture grower who has ever done those things. We never have incidences of tail biting. So when they talk about it being multifactorial and that they have no idea why tail-biting outbreaks happen, we are like, ‘It’s because they’re confined in sheds; there are too many animals too close together who are bored and stressed.’

Despite the fact that some pork producers eschewed the practices, it was the view of the RSPCA that the practices of tail docking and teeth clipping remain routine within the industry. In a public hearing, Ms Rebecca Cook, Head of Prevention at the RSPCA told the committee that there were ‘several invasive and painful husbandry procedures that are performed routinely on piglets, which include castration, tail docking and teeth clipping.’ She said

Following these painful procedures, piglets show signs consistent with pain and distress. In Australia piglets do not have to be provided with any form of best practice pain relief for routine painful husbandry procedures. We believe that where painful procedures continue, pain relief should be mandated.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.1, the words:

It is the RSPCA’s view that ultimately the best solution is the elimination of the practice of tail docking. It told the Committee that

while continued research efforts for effective pain relief options are important, efforts should also be made to identify suitable alternatives to phase out the need for routine tail docking in Australia.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.1, the words:

The Committee understands that there are differing views on the need for these procedures and that they are the subject of on-going research. However, it is not simply the necessity of the procedures that are of concern. The performing of surgical procedures without any form of pain relief, regardless of the reasons for the procedures, appears to cause understandable distress and unnecessary suffering on the animals.

Tail docking, teeth clipping, and ear notching are highly injurious and painful procedures that are commonly performed without the use of pain relief.

That the Victorian Government mandate pain relief for routine surgical procedures such as teeth clipping, tail docking and ear notching.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.2, the words “such as the runt of a litter” be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.2, the words:

Video aired in the media showed a worker holding a piglet by the hind legs and killing it by smashing its head against the concrete floor. This elicited a strong response from submitters to the inquiry.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.2, the words:

A very large number of submission, particularly individual submissions, identified blunt force trauma on piglets as of significant concern.

In its submission, Animals Australia called for the prohibition of the 'the routine inhumane killing of piglets by smashing them against a hard surface'. (Animals Australia, Submission 232, p 30) The submission suggested that it would not be acceptable to kill babies in this way for any other species. It said

This method [blunt force trauma] should not be promoted over more reliable and repeatable cull methods such as captive bolt...there is a significant potential for animal harm associated with inappropriate practice, lack of accuracy, issues with repeatability and operator fatigue

In its submission to the inquiry, Sentient, which is an independent veterinary animal welfare advocacy association, said the Code and the Victorian Standards and Guidelines which allowed the euthanasia of sick or injured piglets under 3 weeks of age by blunt trauma to the head (such as by a hammer), ‘ is currently being interpreted by the industry as a sanction to smash the heads of conscious piglets against a hard surface’.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.2, the words:

While the Committee accepts the sincerity of the pork producers who suggest that blunt force trauma is the quickest and most effective (and thus most humane) was to euthanise piglets who are too either sick or too small to be viable, it considers there are too many factors that can affect the outcome, such as the skill of the person undertaking the task, the practices adopted within an individual facility, worker fatigue and the like. It is also a traumatising activity for the person doing it that over time could lead to substantial mental stress, whether recognised or not.

In the Committee’s view the practice is not acceptable in today’s animal welfare environment and should be discontinued. Where euthanasia is necessary, then it should be carried out under veterinarian supervision with appropriate veterinary tools.

RECOMMENDATION 15: That the Victorian Government prohibit blunt force trauma as a suitable method of piglet euthanasia

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, that in section 6.2, in Recommendation 15 after the word “Government”, the word “prohibit” be deleted and replaced by the words “work with industry to find an alternative to the use of”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Ms Broad moved, that in section 6.3, the words:

The evidence heard during the inquiry strongly suggests that not only is enrichment important for intelligent animals such as pigs in order to maintain their mental well-being, it is essential to limit aversive behaviour such as tail biting. All witnesses and submissions that addressed the issue acknowledged the role that lack of enrichment played in such behaviours.

It is therefore, essential that genuine pig welfare requires that all pig farming facilities provides forms of enrichment appropriate for the animals they keep.

- The provision of enrichment in intensive systems reduces the frequency of tail biting and other aversive behaviour.
- Pasture raised pigs raised in lower stocking densities experience natural enrichment and lower levels of boredom leading to fewer instances of litter mate aggression including tail biting.

RECOMMENDATION 16: That the Victorian Government mandate straw bedding substrate to stimulate natural pig behaviours to prevent injury and abrasion.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.3, the words:

RECOMMENDATION 17: That the Victorian Government investigate enrichment aids for farmed pigs for inclusion in the Animal Care and Protection bill.

be deleted and replaced by the words:

The adoption of enrichment aids should form part of the review of the Model Code of Practice for the Welfare of Animals - Pigs.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.4, the words:

FINDING 3: Biodiverse farm systems and genetic diversity reduce disease spread on pig farms'

be deleted and replaced by the words:

Reporting of antibiotic use on farms already forms part of the APIQ accreditation process.

Dr Kate Savage, a pig vet for more than a decade who has a vet degree and a masters in international animal welfare, ethics and law said:

If you are going to use any kind of medication, whether that is antibiotic or pain relief et cetera, the product has to go through rigorous testing to demonstrate how long it takes to be removed by the pig from the pig's body. That then gives us what is called a withholding period, so we know that after treating an animal with that medication it takes this amount of time before it is out of the pig's body and then it is safe for human consumption. We have pretty strict testing requirements to establish the withholding period of the medications that were used, and that is part of the concern the Australian pig vets were talking about earlier, that it is difficult to get products to market. We have to go through a lot of testing in order to use them in Australia.

Tony Peacock, Chairman of the Australasian Pork Research Institute (APRIL) said:

Antibiotic use and hormone use has changed substantially. There are many myths about hormones. There are no added hormones used in the Australian pork industry. Antibiotics are used to treat sick pigs. Just like in human medicine, we make efforts to target the right antibiotics for the right diseases in the right amounts. The livestock industries, in my view, are doing much better in our antibiotic changes than the medical industry is for human health. So I think it is disingenuous to say the industry has not changed. These were changes initiated by the industry itself, not imposed on it. The truth is most people eat and enjoy pork.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Broad moved, that in section 6.4, the words

RECOMMENDATION 18: That the Victorian Government implement regular surveillance monitoring and reporting of antibiotic use on Victorian farms.

be deleted.

The question was put.

The Committee divided.

Ayes	Noes
Ms Broad	Ms Purcell
Mr Welch	Mr McIntosh
Ms Deeming	Ms Terpstra
	Mr Berger
	Ms Copsey

The question was negatived.

Ms Terpstra moved, that in section 6.4, in Recommendation 18 the following text be inserted after the word “implement”: “require industry to implement the” and after the word “and”, include the word “public”.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Adoption of the Report

Ms Terpstra moved, That Chapter 1 (as amended) be adopted and stand part of the Report.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Mr Berger moved, That Chapter 2 (as amended) be adopted and stand part of the Report.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Mr McIntosh moved, That Chapter 3 (as amended) be adopted and stand part of the Report.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Ms Copsey moved, That Chapter 4 (as amended) be adopted and stand part of the Report.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Ms Terpstra moved, That Chapter 5 (as amended) be adopted and stand part of the Report.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Mr McIntosh moved, That Chapter 6 (as amended) be adopted and stand part of the Report.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Ms Terpstra moved, That the Draft Report (Chapters 1 to 6, including Findings and Recommendations, together with Appendix A), be adopted as the Report of the Committee, and that it be Tabled on 20 June, 2024.

The question was put.

The Committee divided.

Ayes	Noes
Ms Purcell	Ms Broad
Mr McIntosh	Mr Welch
Ms Terpstra	Ms Deeming
Mr Berger	
Ms Copsey	

The question was agreed.

Minority report



INQUIRY INTO PIG WELFARE IN VICTORIA: MINORITY REPORT

LIBERAL AND NATIONALS

June 2024



Renee Heath
Liberal Party



Gaelle Broad
The Nationals



Bev McArthur
Liberal Party

Foreword by the Liberal and Nationals

This report by the Liberal and Nationals members on the Legislative Council Economy and Infrastructure Committee Inquiry into pig welfare in Victoria is a response to biased and ideologically motivated findings and recommendations in the final Committee Report by the Animal Justice Party Chair and Labor Members on the Committee.

This bias stems from the inquiry being self-referenced by the Animal Justice Party Committee Chair, who is on record opposing the pig industry entirely and advocates for its complete shutdown.

The Committee Report demonstrates a lack of impartiality, fairness, and scientific evidence. The deliberate use of emotive language by the Chair, supported by the Labor Party, is a deliberate attempt to discredit a highly regulated industry known for its excellent compliance. The overwhelming bias towards testimonies from animal extremists who are advocating for the complete shutdown of the pig industry undermines the report's credibility, failing to present a balanced and objective assessment of this vital industry.

To address these concerns, the Liberal and Nationals have ensured that each finding and recommendation in our report is firmly grounded in scientific evidence, supported by highly educated experts in the field, many of whom hold PhDs, and backed by factual data.

Contrary to the sensationalist claims and politically motivated attacks by the Animal Justice Party Committee Chair, the pig industry in Victoria stands as a beacon of excellence and accountability. Governed by stringent regulations and subject to rigorous oversight, including regular independent audits, Victoria's pig farming sector prioritises the welfare of its animals while maintaining impeccable production standards.

The Victorian domestic pork industry plays a crucial role in Australia's food supply chain. In Victoria, and in fact, Australia, pork products rank as the second most-consumed protein following chicken. Approximately 253 commercial pig businesses operate within Victoria, sustaining an estimated 3,360 jobs encompassing pig farming, further processing of cured meats, smallgoods production, and manufacturing¹. According to insights provided by the national representative body for Australian pig meat, Australian Pork Limited, the pig industry made a substantial contribution of around \$6 billion to the Australian economy during the 2022–23 financial year, with approximately \$1.3 billion entering the Victorian economy².

Amid a cost-of-living crisis where affordability is crucial and pork is the second most consumed protein in Australia, with its popularity increasing, it is vital to prioritise consumer choice in food consumption. We must counter the influence of extreme animal rights viewpoints wanting to close the pork industry down entirely and uphold consumer choice.

Victoria's pig industry is characterised by innovation and continuous improvement. Producers embrace new technologies and best practices to enhance efficiency and minimise environmental impact. From advanced waste management systems to sustainable feed

¹ Department of Energy, Environment and Climate Action

² Margo Andrae from Australian Pork Limited, 13 March 2024, *Transcript of evidence*, page 4.

practices, the industry is committed to excellent animal welfare outcomes, reducing its ecological footprint while meeting the growing demand for high-quality pork products that provide an affordable source of protein.

The dedication of Victoria's pig farmers to upholding the highest standards of animal welfare sets a benchmark for the industry not only nationwide, but globally. Through collaboration with regulatory bodies, research institutions, animal welfare groups and industry stakeholders, Victoria's pig sector remains at the forefront of responsible and sustainable farming practices, upholding the highest standards of pig welfare.

Recommendations

- 1. The Victorian Government recognise the significant contribution of the Victorian pork industry. A sector that produces world class products, bolsters food security, provides career opportunities, and leads the world in animal welfare outcomes through research and innovation.**
- 2. That the Victorian Government recognise that the Australian pork industry is one of the most rigorous independently audited and regulated sectors in the country and should be commended for its high level of compliance. With APIQ servicing as the primary quality assurance (QA) program, it has been voluntarily adopted by 91% of pig producers nationwide.**
- 3. Any proposal that impacts pig welfare and husbandry practices including the housing and management of boars and mating stalls, side loader carbon dioxide stunning systems and enrichment aids, should be considered as part of the development of the new national code to ensure consistency between states.**
- 4. That the Victorian Government participate and contribute to updating and replacing the 2008 Model Code of Practice for the Welfare of Animals: Pigs through the Australian Animal Welfare Standards and Guidelines process.**
- 5: That the Victorian Government allocate funding to Australian Pork Limited to support ongoing research and development of commercially viable alternatives to the use of CO₂ in stunning pigs prior to slaughter, with a requirement to report on these alternatives no later than May 2026.**
- 6. All forthcoming regulations under the new Animal Care and Protection Act should align with the Australian Model Code of Practice for the Welfare of Animals: Pigs.**
- 7. The upcoming Animal Care and Protection Bill must incorporate restrictions on third-party litigation against pig farmers and processors, as well as measures to curb vexatious and frivolous legal action by serial litigants.**
- 8. The Victorian Government should establish laws imposing tougher penalties for illegal trespassing by activists on farms, mandating the enforcement of minimum penalties.**
- 9. The use of closed circuit television (CCTV) to be formalised as part of the review of the National Code.**

Introduction

The minority report presents a clear rebuttal to the recommendations outlined in the Committee's Final Report. Many of the committee report's bias and ideologically motivated recommendations are redundant, as they are already addressed by existing legislation or will be covered by forthcoming updates to the Model Code of Practice for the Welfare of Animals: Pigs. Some of the recommendations are deemed unnecessary because they overlap with provisions in the current Prevention of Cruelty to Animals Act (POCTA) legislation and the anticipated updates to the Model Code of Practice. For example, calling for mandatory straw bedding should not be accepted, as the choice of piggery type should remain at the discretion of individual businesses as long as they comply with national standards. Many piggery systems are designed to handle liquid manure, and the addition of straw can create physical barriers that obstructs the flow and clogs up the manure handling systems.

We do, however support recommendation 14 that the Victorian Government support a national standards framework including enforceable welfare guidelines.

Executive Summary:

- This parliamentary inquiry into pig welfare was a political stunt led by the Animal Justice Party to close the pig industry, supported by Labor and the Greens
- The Chair abused parliamentary processes and failed to act with impartiality during the inquiry.
- Pork is the second most consumed meat in Australia and the Victorian pork industry is a vital part of Australia's food supply chain.
- Victoria's pig industry is the most highly regulated animal industry in Australia.
- Australia's pork industry is a world leader in research and training methods such as ProHand.
- Victoria's pork industry has demonstrated an ongoing commitment to improving animal welfare standards.
- Animal extremists intent on closing the meat industry should be held accountable for illegally trespassing on farms.
- For consistency between states, any changes to Victoria's animal welfare standards should align with the national review of the Animal Welfare Standards and Guidelines process.
- Further regulation and restriction of farming practices threatens to close Victoria's pig industry, making it harder for people to work in the industry, driving up costs and leading to a greater dependence on imported products where there is no oversight of farming practices and welfare standards.

Lack of impartiality

This inquiry was self-referenced by the Chair who was elected with only 1.5% of the public vote to represent the Animal Justice Party in Northern Victoria after doing a deal with ‘preference whisperer’ Glenn Druery under Victoria’s outdated group voting system³.

During the course of the inquiry the Chair showed a gross lack of impartiality referring to ‘my inquiry’ and making reference on social media to the ‘sexual abuse’ of animals being ‘routine’ in Victoria.

The Chair actively promoted and defended the actions of animal extremists illegally trespassing on to private property stating, ‘The Government should do the job of the activists themselves, instead of punishing them more and more heavily.’

Despite taking a public stance against social media abuse, the Chair neglected her duty of care for committee members, by misleading the public and vilifying committee members on social media who respected parliamentary procedure and objected to the public re-broadcasting of illegally obtained footage which may also be utilised in court proceedings.

The illegal footage aired during the inquiry was obtained by Chris Delforce, a former political candidate for the Animal Justice Party. When asked about the timing of the footage aired on the ABC program 7.30 the night before the public hearings for the pig inquiry, the Chair implied direct involvement stating at the public hearing that ‘we would take deep offence that we would time severe acts of cruelty to a pig around an inquiry.’

The Chair’s personal views as being a self-described ‘Vegan Animal Advocate’ call into question her ability to Chair a balanced inquiry into the pig industry. During the inquiry the Chair also foreshadowed potential recommendations in the media, stating ‘We’re not calling for a ban on intensive pig farming immediately, but we certainly do want to see it phased out.’

The role of a Chair during a parliamentary committee inquiry can be compared to the impartiality of a Speaker or President. In committees, the impartiality should be reflected in the way in which a meeting is chaired, public hearings are conducted and as the spokesperson for the committee’s work.

It is disappointing that Labor members of the Committee failed to hold the Chair to account during the inquiry and made no effort to address the Chair’s public position of closing down the pig industry. This should send a shiver down the spine of all agricultural producers and Victorians who live in rural and regional Victoria.

FINDING ONE: The Chair undermined parliamentary processes and failed to demonstrate impartiality during the pig welfare inquiry with the support of Labor committee members.

³ [AJP 'sting' on preference whisperer Glenn Druery likely to see Georgie Purcell elected | Bendigo Advertiser | Bendigo, VIC](#), November 2018

Animal extremists' intent on closing the meat industry

Reflecting the ideological bias of this inquiry, most animal welfare groups who gave evidence believe the pig industry should be shut down entirely.

Chris Delforce from Farm Transparency Project, who lacks formal qualifications in animal welfare, responded to a committee member's question about whether he aimed to end meat and livestock production for human consumption by stating:

'Absolutely⁴.'

Chris Delforce also stated:

'Ultimately, we do not believe that pigs should be bred, raised and killed for food. We do not believe it is necessary⁵.'

Chris Delforce when asked if his view was whether the chicken, beef, lamb and fish industries should also be ended he said:

'Yes, it is. From what I have seen in the more than a decade that I have been investigating all these industries, they are all inherently cruel and I think not in alignment with most Australian's values⁶.'

When asked what would stop Mr Delforce from illegally trespassing on farms, his response was:

'It would be at the phasing out of the industry. I mean, we have said that CO₂ is not the only bad way to do things, it is all bad. If CO₂ is phased out, we will focus more on how bad the alternatives are⁷.'

Lisa Ryan from Animal Liberation when asked if she wanted to see pig farming banned responded:

'Yes. Animal Liberation is an animal rights organisation, as I outlined in our statement. It does promote a vegan lifestyle⁸.'

Pam AHERN from Edgar's Mission also said:

'... My dad used to say to me, 'You know, ltsy, what if everyone stops eating meat overnight – what are you going to do with all the animals?' This was probably 40 years ago, and I said to my dad, 'Well, it's not going to happen.' But now we are actually having conversations where potentially it could happen, but we have phase-out periods. We have governments that can support these people. I mentioned the Farms Transition Project to help farmers to transition out of animal-based agriculture into plant-based agriculture. So it is not going to happen

⁴ Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, page 18.

⁵ Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, page 13.

⁶ Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, page 20.

⁷ Farm Transparency Project, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, page 22.

⁸ Animal Liberation NSW, public hearing, Melbourne, 12 March 2024, *Transcript of evidence*, page 61.

overnight, as much as I wish it would, but I think the writing is on the wall that these things are starting to happen⁹.

These testimonies underscore the necessity of legislative measures to protect pig farmers and processors from illegal harassment, ensuring they can operate without interference from parties holding opposing ideological perspectives aiming to dismantle the industry entirely.

FINDING TWO: Most animal activist groups who gave evidence believe the pig industry should be shut down entirely.

⁹ Edgars Mission, public hearing, Melbourne, 12 March 2024, *Transcript of Evidence*, page 41.

Restoring the imbalance of this inquiry

At the public hearings, industry representatives pushed back against the animal activists seeking to undermine the pork sector.

Dr Robert van Barneveld, Chief Executive Officer and Managing Director of SunPork, who has a PhD in the nutrition of pigs stated,

'The vast bulk of Australians are voting with their wallets and their feet by eating a significant amount of meat in their diets, so they obviously accept that animals are a fundamental part of the food chain. I like to always take things back to basics. The reason until recently pork was the most consumed meat in the world is because it represented a very valuable store of excess grain or products that could not be eaten by humans, and then that could also be preserved. It is a very effective way of providing nutrition over an extended period of time, and that is why it is such an important part of diets and culture around the world. I suppose the bit that frustrates me immensely is this constant obsession with trying to catch us out with individual animals or adverse events, and to then present an entire industry as being this abhorrent group of monsters is just inconceivable. We are producing food that people want to eat. We do not work with pigs because we do not like them. We work with them because we love them, and we have devoted our careers to that process. To suggest anything otherwise is very frustrating. When you hear about farm raids and some of the stuff that is presented, it is so frustrating because as an industry we do not lower ourselves to that level and we let those mistruths get away too often.'

Edison Alvares, Chief Operating Officer, Pork Division, told the Committee:

'We are very proud to be providing a service to Australians and providing good quality protein to their tables. I think the way it is being portrayed and the way it is being exposed give exactly the opposite of it, which is very detrimental to the whole industry, to the whole families and the whole communities that live and breathe that kind of business. I think if there is one thing, I would like this committee to help to change that perception, because that is so far, again, from the truth that it is not funny.'

At the public hearings, Victorian pork producer Tim Kingma said,

'Today I will be celebrating our industry, and I hope that the majority of this committee will join with me. I am here to shed light on the essential role that pork producers play in animal welfare and our communities, the dedication we bring to our work and the positive impact we have on lives in Victoria. Rural communities are the backbone of Victoria. Pork producers are an integral part of that fabric. Our farms are not just a place of business. They are our homes. Our neighbours are our family. We contribute significantly to the economy of Victoria, creating jobs, supporting businesses and fostering a sense of pride.

I am passionate about rural and regional Victoria, and our agriculture and piggery industry are vital to that. It is important to understand what pig farmers look like. Having farmed animals since childhood, the first consideration we have is for the health and welfare of our animals. Without caring for animals you cannot be successful. We understand social licence to the extent that the industry agreed to self-regulate the phasing-out of gestation stalls. On our

existing farms it meant refurbishing existing sheds to eliminate the gestation stalls. The cost of doing this was completely absorbed by us, as there was no government assistance or price incentive to do so. Here is an opportunity for this inquiry to applaud and celebrate the steps taken by the pig industry to improve animal welfare outcomes. We understand the need for farming standards that are tested. Our farms have been early adopters of the APIQ program, which includes an annual audit by an independent auditor to verify the standards of care within the farm. Once again, this inquiry should use this as an opportunity to applaud and celebrate the industry for developing the APIQ program. I am proud that we continually invest to improve the welfare of our pigs. Our sheds and our climate controls for the pigs are leaving a protected environment from the elements in the temperatures they prefer. I want to reaffirm the dedication of pork producers in Victoria to the wellbeing of our animals, our communities and the people we proudly serve. I hope this committee can celebrate the pork industry and have the courage to back our industry.'

RECOMMENDATION ONE: The Victorian Government recognise the significant contribution of the Victorian pork industry. A sector that produces world class products, bolsters food security, provides career opportunities, and leads the world in animal welfare outcomes through research and innovation.

Regulatory framework

The Australian pork industry stands out as one of the most independently audited and monitored industries nationwide. It operates under a variety of regulatory frameworks (outlined below), ensuring compliance through authorised officer visits, regular independent audits, market requirement audits, meticulous record-keeping, and declarations¹⁰.

- *Prevention of Cruelty to Animals Act 1986* and *Prevention of Cruelty to Animals Regulations 2019* (Victoria),
 - o The Animal Welfare Victoria investigation, compliance and enforcement team
- *Impounding of Livestock Act 1994* and *Impounding of Livestock Regulations 2018*
 - o Police provisions to respond to cruelty complaints, \$ penalty units for non-compliance (250 units = \$48, 000)
- *Livestock Management Act 2010* and *Livestock Management Regulations 2021* (Victoria)
 - o Victorian Standards and Guidelines for the Welfare of Pigs (Pig Welfare Standards)
- *Meat Industry Act 1993* and *Meat Industry Regulations 2015* (Victoria)
- Australian Standard for the *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS4696:2023)*
- *Livestock Disease Control Act 1994* and *Livestock Disease Control Regulations 2017* (Victoria)
- *Veterinary Practice Act 1997* and *Veterinary Practice Regulations 2018* (Victoria),
- Australian Animal Welfare Standards and Guidelines
 - o Model Code of Practice for the Welfare of Animals: Pigs (3rd edition) (MCOP)
 - o Australian Animal Welfare Standards and Guidelines for Land Transport of Livestock (Land Transport Standards) and Fit for Intended Journey guide
- Agricultural and Veterinary Chemicals Acts (Federal and State)
- Australian Pork Industry Quality Assurance Program (APIQ[✓]®)
- Codes of Practice for the Welfare of Animals at Saleyards July 2020 (Victoria)
- *Export Control Act 2020* and the Export Control (Meat and Meat Products) Rules 2021 (Federal)
 - o Department of Agriculture, Fisheries and Forestry (DAFF) Approved Arrangements at export-certified abattoirs.

Dougal Purcell, Acting Chief Executive for Agriculture Victoria stated during a public hearing:

'I highlight these various regulatory instruments to emphasise that Victoria's pig industry is not self-regulated; there are a number of mandatory regulations that this industry aligns with.'

Dougal Purcell, also said:

'...in the regulatory framework that covers Victoria's pig industry, a core Act is the Prevention of Cruelty to Animals Act and its supporting regulations. This code sets out the main laws for the protection of all animals from cruelty in Victoria. Importantly, for the sake of this inquiry, the

¹⁰ Australian Pork Limited submission No. 543.

Act applies to all stages of production up to the point of slaughter. The actual act of slaughter is exempt from the Prevention of Cruelty to Animals Act if the requirements of the Meat Industry Act or other relevant Commonwealth Acts in export facilities, such as the Export Control Act, are complied with. More detailed standards for the care and treatment of pigs are set out under the Victorian Standards and Guidelines for the Welfare of Pigs.'

Australian Pork Limited's submission also states:

'The industry is highly regulated with numerous checks and balances in place to ensure all aspects of the industry meets high standards. In addition to animal welfare, this encapsulates legislation relating to biosecurity, workplace safety and planning and the environment. In addition to the compliance and enforcement regime undertaken by State and Federal Government, the Victorian pork industry has implemented voluntary industry standards to support its strategic goal of being a leader in the care and welfare of pigs.'

Edison Alvares, representing Rivelea, Diamond Valley Pork and Seven Point Pork business that employs 500 people across Victoria within metropolitan and regional communities, told the Committee at a public hearing:

'The pork industry is a heavily regulated industry, as you probably heard from the previous sessions, and these standards and regulations have been set in conjunction with government, industry and animal welfare specialists. Most importantly, they are grounded in the best science available on animal welfare. Our practices are compliant with and accredited by the Australian Pork Industry Quality Assurance program (APIQ), and the Australian Livestock Processing Industry Animal Welfare Certification System (AAWCS).'

APIQ[✓][®] is the leading quality assurance (QA) program for pig producers in Australia, with a voluntary adoption rate of 91% of national production¹¹. On-farm compliance with the APIQ[✓][®] Standards is verified by an independent third-party auditor, ensuring the program's credibility. AUS-MEAT Ltd, the contracted auditing organisation, conducts these independent annual compliance audits for all certified producers.

'While the Model Code outlines minimum welfare standards, APIQ standards exceed these, with 91% of commercial Australian pig farmers APIQ accredited. This accreditation requires independent annual audits by third party auditors, AUS-MEAT, and mandates six-monthly internal audits¹².

Apiam Animal Health said in its submission to the inquiry:

'The APIQ[®] standards compliment and reinforce the existing legislative requirements. Through this program producers are independently audited annually, by a third-party auditing organisation.'

¹¹ Australian Pork Limited submission No. 543.

¹² Victorian Farmers Federation submission No. 215, page 7.

Pork producer Tim Kingma told the public hearing:

'Listening to APL earlier I think they are sitting at over 90 per cent of pigs under APIQ. I do not know how it compares to other industries, but I have to imagine 90 per cent has got to be very strong, because in school terms you are a high distinction. To me, it is continually evolving too, and I think that is the real positive about it. I do get involved in our industry obviously – I am passionate – and I think we continually are trying to update it. We are continually striving to improve it.'

At the public hearings pork producer Martin Clark said:

'Without healthy animals we do not have a business, so it is paramount for us that we are best practice and that they are all humanely treated and looked after the best they can be.'

The Committee was also informed about the role of veterinarians in ensuring compliance with animal welfare standards and guidelines.

Apiam Animal Health contended that:

'Regulatory frameworks are by definition, the minimum standard required. Australian pig veterinarians encourage science-based improvement in animal production and are involved with conducting ethically approved research in pig welfare. An important role of the veterinarian is to make observations pertaining to pig health and welfare, and where issues are observed, to subsequently investigate their causes with the objective of implementing practical interventions to resolve these issues. Veterinarians play a key role in not only developing this welfare science, but also ensuring that the research findings are appropriately assessed in the real world and implemented on farms.'

Reports on industry and government compliance and enforcement efforts are documented through various mechanisms at the Industry, State, and Federal Government levels.

Katherine Cliff, Executive Director of Biosecurity Victoria also spoke about the regulation of the pork industry at the public hearings:

'The welfare of animals in Victoria is protected by the Prevention of Cruelty to Animals Act, as our Acting Chief Executive explained, and that Act applies to all stages of pig production. Underneath that we have the Victorian standards and guidelines for the welfare of pigs. All complaints that are received by the department are taken seriously and investigated in accordance with our departmental procedures. Each investigation will be assessed to determine the most appropriate regulatory outcome, and as I mentioned before, that could include education; warning letters; infringements, where that is provided for; and in some cases, a prosecution – or the animals may be seized. Our role is to use the suite of regulatory tools that we have to promote compliance and achieve enforcement, to educate the industry and community on their responsibilities and obligations and also to work closely with our co-regulators, such as the RSPCA and PrimeSafe. We strongly encourage anyone who has concerns to report those to Agriculture Victoria.'

PrimeSafe

PrimeSafe is the statutory authority responsible for regulating the safety of meat, seafood, and poultry in Victoria¹³. PrimeSafe plays a critical role in ensuring that the production, processing, and distribution of pork products meet stringent safety and hygiene standards. Established under the Meat Industry Act 1993, PrimeSafe's functions include:

- Controlling and keeping under review the standards of meat, poultry meat and game meat produced for consumption or sale within Victoria.
- Carrying out functions conferred on it under the Seafood Safety Act 2003.
- Licensing meat processing facilities and seafood businesses¹⁴.

Comprehensive state and federal regulatory frameworks, as well as the industry frameworks, govern the Victorian pig industry to support good animal welfare outcomes.

FINDING THREE: The Victorian pig industry is one of the most regulated industries in the country. The Australian pork industry demonstrates a high level of compliance and is one of the most independently audited and regulated sectors in the country. With APIQ✓[®] serving as the primary quality assurance (QA) program, it has been voluntarily adopted by 91% of pig producers nationwide¹⁵.

RECOMMENDATION TWO: That the Victorian Government recognise that the Australian pork industry is one of the most rigorous independently audited and regulated sectors in the country and should be commended for its high level of compliance. With APIQ servicing as the primary quality assurance (QA) program, it has been voluntarily adopted by 91% of pig producers nationwide.

¹³ Department of Energy, Environment and Climate Action and Primesafe submission no 425. Page 4.

¹⁴ Department of Energy, Environment and Climate Action and Primesafe submission no 425. Page 4.

¹⁵ Australian Pork Limited submission No. 543.

Pig welfare and husbandry practices

As part of the process of updating the Model Code of Practice for the Welfare of Animals: Pigs, husbandry practices will be reviewed to ensure the continuous improvement of pig welfare and husbandry standards.

A rich depth and breadth of animal husbandry knowledge and skill exists within the industry and support services. This continues to be developed via industry research and development and through under-graduate and post-graduate animal science, agriculture and veterinarian university qualifications. These courses are conducted by highly qualified and specialised trainers (including veterinarians), using contextualised content based on the latest research. Enrolment and completions of the Certificate III in Pork Production have risen over the last five years. Training includes essential units of competency for pig care, welfare and safe handling. Additionally, on-farm training occurs on an ongoing basis which also reinforces pig care and welfare best practice. Producers draw on industry research and development to support their workplace structured training¹⁶.

Victorian pig farmer, Tim Kingma outlined some animal welfare practices on his farm:

'I have been working on our family farm for 20 years. I think the relationships we have are some of the biggest changes. You know, with your farm vet, you are not seeing them once a year, which happened 20 years ago, you are talking to them weekly. Your key staff will ring straight directly to the farm vet. I would imagine as farms get bigger they employ their own veterinarians as well. We are only a family farm, so we are not that big. So it is those relationships, but then it is relationships in all other aspects as well of the business. For me, my parents bought the farm in the 90s, which was actually a bankrupt piggery, from the bank, and we just continually invest in new technologies. We see what is going on in the rest of the world and try and adapt it back here. We have climate control. I have just come off four days of virtually high 30s every day, and the sows in our farrowing sheds set at 28. I think 28.7 degrees was the hottest they got to. That is why I say for what we are doing animal welfare is number one, and we invest and keep reinvesting, knowing animal welfare is our number one, because if you do not do it, you are not successful.'

Edison Alvares, representing Rivelea, Diamond Valley Pork and Seven Point Pork business that employs 500 people across Victoria within metropolitan and regional communities, told the Committee:

'We take animal welfare very seriously. We are focused on the sustainable production of pork, which includes an uncompromising commitment to animal welfare for every animal under our care every day. We ensure the health and wellbeing of our people and provide economic benefits for the communities we operate in. Leading animal welfare standards are ingrained in our culture. The globally recognised five domains framework guides our animal welfare policies and practices. The five domains are nutrition, environment, health, behavioural

¹⁶ Australian Pork Limited submission no. 543, page 15.

interactions and understanding the pig's mental state, with a focus on fostering positive natural behaviours that can result in improved quality of life. These domains inform everything we do in our business, including operational guidance from our team of highly qualified vets, nutritionists, geneticists and animal science and welfare specialists. We regularly train our staff to ensure positive and empathetic interactions towards our animals. We monitor our animals daily for welfare and continually review systems and living environments that offer superior welfare outcomes. We operate stringent processes that comply with all regulatory requirements and animal welfare standards expected of us. We are committed to continuous improvement and take an evidence-based approach towards adopting new measures that enhance welfare outcomes.'

Mr Alvares went on to say:

'We have in our business a zero-tolerance approach to any animal welfare breaches, and we investigate any reported matters thoroughly and take appropriate actions. Our welfare performance is regularly audited by independent bodies, including by the Department of Agriculture, Fisheries and Forestry, who have a continuous presence in our meat-processing facilities to ensure compliance with export certifications, and we have APIQ on farms.'

The Committee also received evidence about the ProHand training program, developed over decades in Australia to improve the interaction between livestock handlers and pig by minimising animal stress and improving animal welfare. ProHand is now being adopted in other countries including Canada to develop the skills of stock hands in the pig industry.

Dr Rebecca Morrison, Research, Innovation and Animal Welfare Manager told the Committee:

'We have rolled out ProHand training across our farms and in our meat processing plants. A fundamental part of that training program is understanding human behaviour and the impact that we as humans have on those pigs, and part of that is an empathy score. We can survey people and determine how empathetic those people are, because people that are empathetic are amazing stock people because they care for pigs. That is the fundamental basis of that stock person training program. And then we go on to explain positive behaviours, your impact on the pig – that has a profound effect on that pig's welfare and how we care for that pig'

Dougal Purcell, currently the Acting Chief Executive for Agriculture Victoria in the regulatory section told the Committee:

'Within the legislative framework in which we operate, there are also national animal welfare standards and guidelines to be considered. The existing model codes of practice for the welfare of animals relating to livestock are progressively being reviewed at the national level and are being replaced with Australian animal welfare standards and guidelines. Developing standards and guidelines involves an extensive stakeholder and public consultation process as well as regulatory impact assessments. Once each standard and guideline is developed at the national level, it is then the role of each state and territory across the Commonwealth to adopt them into their legislation as appropriate.'

Trevor Piscotta from Agriculture Victoria told the Committee that many livestock industries operate across jurisdictional borders, and the benefits of having nationally consistent regulations in relation to the treatment of animals:

‘As you know, there has been an industry phase-out of sow stalls, and I understand that now 88 per cent of pig farms are certified by Australian Pork Limited as sow stall free. So the process from here in terms of any regulatory steps around the further regulation of sow stalls involves the work of the national animal welfare task group, who have committed to developing animal welfare standards and guidelines for pigs, and sow stalls would be considered as part of that process. There has been to date no commencement of that work and there is no date set for the commencement of that work. That is kind of the national process, and I think in general Victoria’s preference has been to engage in national processes, because we appreciate that many of our livestock industries operate across jurisdictional borders and there is a lot of benefit to having nationally consistent regulations in relation to the treatment of animals. So that is always the first port of call.’

RECOMMENDATION THREE: Any proposal that impacts pig welfare and husbandry practices including the housing and management of boars and mating stalls, side loader carbon dioxide stunning systems and enrichment aids, should be considered as part of the development of the new national code to ensure consistency between states.

RECOMMENDATION FOUR: That the Victorian Government participate and contribute to updating and replacing the 2008 Model Code of Practice for the Welfare of Animals: Pigs through the Australian Animal Welfare Standards and Guidelines process.

Outdoor group housing

The Committee report recommended the Victorian Government support farmers to transition to outdoor group housing, however evidence presented to the committee identified that both indoor and outdoor farming methods present their own unique challenges.

Dr Kate Savage, a member of the Australian pig vet association under the AVA, a pig vet of more than 12 years with a vet degree and a masters in international animal welfare, ethics and law told the parliamentary inquiry:

'Free-range production, I guess like any type of business, has its pros and cons. You do require obviously a large expanse of land. It has to be affordable land, as in not too close to people et cetera. It also then has to have the correct soil type so that you can manage nutrient deposition et cetera. It has to be in the right climate for the pigs – obviously they do not like hot weather et cetera. It is not something that we can just set up on every corner in every part of Australia. The sites have to be licensed by the Department of Energy, Environment and Climate Action in Victoria, and then usually there are council regulations and things as well. There have been some recent attempts in Victoria for producers to open free-range farms but they have actually been postponed or delayed at that council level.'

From a producer point of view, they do take a bit of hit at times, because it is a less efficient way of producing the pigs. If you feed the two types of pigs a kilogram of feed, the free-range farm pigs have to put a lot more energy into staying thermally comfortable. They have to put more energy into staying cool or staying warm rather than growing. You have then got the increased losses in the farrowing huts, with overlays and things like that. It is not as productive, which is fine – that is okay – but then the real kicker comes when the producers do not necessarily get paid the premium that they should for producing in that way. We have seen a situation before where it has ended up actually not economically viable to remain as a free-range producer or to enter as a free-range producer, which is a bit of a shame really. They might be some of the pros and cons that we are talking about.

From a vet point of view, free-range production makes biosecurity a little bit more tricky. We were just talking about how important it is for the pigs. In that free-range setting you have got the pigs, the straw, their bedding, their wallows, their feed and their water all sort of exposed to wild birds. Birds can carry things like avian influenza. They can carry salmonella. We have just got that risk that we cannot quite control like we would indoors. Also, it is harder to control the rodents, and they carry swine dysentery. There is a biosecurity risk that comes with that type of production. Obviously, as vets we would work with all types of producers. It is just about getting to the best possible standard with whatever production type they have decided to use. We just do our best in those situations.

Martin Clark, an outdoor pork producer from Murnong Farming, told the committee hearing:

'Judy's and our business and a couple of the other ones, we are free-range pigs. We do not have them in sheds as breeders and we do not use sow stalls, so our pigs are open to the

elements a lot more. We have other risks, like feral animals, foxes. It is nothing more than you turn up in the morning and you have got an agitated sow that has given birth and there are only six piglets, and you wonder where the other five have gone, and there is a mother fox teaching her kits how to grab them as they are born. Then you find the carcasses laying in a gutter with just a mouthful out of them. So we are free-range, and that is one of the things with – you know, it is disappointing, but that is the law of the jungle in that situation. We try to eliminate that. We have pest management systems for fox control and all those sorts of things. We are only a few k's out of town. We have posted back three or four dog collars to owners that think their little pooches sit on the back step all night, but they have come out and had a feed of our lambs and we have caught them, so we put the collars in the envelope Wednesday 13 March 2024 Legislative Council Economy and Infrastructure Committee 54 and post them back after they have been shot. So there are a lot of issues around that and people not understanding to protect their animals.'

Mr Clark also acknowledged the, 'higher mortality rate because they are out in the open and that is what happens', some of the challenges including feral animals, "Cats are the biggest issue, because they spread disease, and they are the worst. I think last year we trapped 67 black and white cats."

Producers also made it clear that the same level of animal care applies to larger farms, Dr Robert van Barneveld, Chief Executive Officer and Managing Director) said,

'We do not get a dispensation for a lower level of care because we have got a larger farm. The obligations are the same. If we get larger, that is a massive challenge that we are up to, but we have to deliver the same level of care to an animal that is on a large farm as we would to an animal that is on a small farm. That is the reality.'

Industry representatives also highlighted improvements to farm practices through investment in the latest technology on farm. Kenton Shaw, Executive General Manager stated:

'The way we manage the farms, we invest in tasks to remove labour-intensive tasks from an historical perspective, such as handfeeding sows, such as long movements of pigs, such as climate control. We invest in new technology to eliminate those tasks to dramatically reduce the hours required, which then allows them basically more time to spend on animal husbandry, which is clearly defined as looking after animal welfare.'

Tim Kingma, pork producer said:

'For me, there is always reinvestment, and that is what you do. To me it is about reinvesting in newer technologies. I also think of our staff – I talk about having 30. Gone are the days 20 years ago where you spent the first 2 hours of the morning just pushing a trolley around feeding animals. Now it is about automation – it is about making it easier for the animals and the staff and considering both, not only animal welfare but human welfare. Things are always changing, and I think where our industry is great is that we are continually doing it. I do not want to say what other industries are doing but I am proud that ours does do that – continually improves and continually reinvests'

Ongoing industry funded research

The Australian pork industry actively engages in extensive research, development, and extension initiatives, often funded by industry, to continually improve animal welfare outcomes.

Margo Andrae, CEO of Australian Pork Limited during a public hearing said:

'Over the last decades APL has invested more than \$23 million of producer money into animal welfare research alone, adding to the tens of millions invested by organisations such as Pork CRC and the Australasian Pork Research Institute. We seek out new science and new ways of working to continually improve the way we look after our people and our pigs. Through rigorous research, ongoing education and the implementation of best practice, we aim to ensure the humane treatment of pigs at every stage of their journey from farm to table.'

Kenton Shaw, Executive General Manager of SunPork Farms said:

'In terms of Australian investment in animal welfare, we are very focused on continuous improvement. As Rob mentioned – as has been mentioned – we focus on the outcomes of the animal. We are quite happy to do research that changes a practice to deliver a better outcome. A clear example is no teeth clipping. Once we have identified that there is a better outcome, we will do the research on it and we will work on it, and then we can bring it into practice on a wide scale. We are not focused on just achieving the minimum standards which exist either in Australia or elsewhere. We are happy to exceed them, but we need to make sure that they are balanced – that the outcome is more positive and the research backs up that outcome¹⁷.'

Tony Peacock, Chairman of the Australasian Pork Research Institute presented at the public hearing and told the Committee:

'I was pretty disappointed listening to one witness that you had here in a previous session who said that you could have gone to sleep in 1980 and woken up now and nothing has changed in this industry. That is not my experience. My career started in the pig industry in the 1980s. During the late 1970s and 1980s the industry stopped castrating pigs. I did not see a pig castrated until I worked in the Canadian industry. Most of the rest of the world still castrates pigs. Australia led the world in stopping castrating, and Improvac, the vaccine now used around the world, was developed by a collaboration between the Victorian Institute of Animal Science and CSL Animal Health. Australia was the first place in the world to register immunocastration, in 1998.

During the 1990s we also introduced the ProHand program that John very briefly mentioned. We actually did so in the face of ridicule from the Sydney shock jock of the day John Laws and the Australian Senate for spending taxpayers money on what they termed a 'pat a pig' project. Some of your earlier witnesses made the case that the industry is slow to respond to public sentiment. In the case of the professional handling of pigs – and Professor Hemsworth will be speaking to you later; he was the principal investigator on that work 30 years ago – we were way ahead of public sentiment.

¹⁷ Kenton Shaw, Sunpork Farms, *Transcript of evidence*, page 46.

I was the research manager at the pig R and D corporation in the 1990s when CO₂ stunning was introduced. The committee has heard several times that the first unit was installed in Corowa in 1991. To my recollection there was actually a research unit at the Victorian Institute of Animal Science earlier.

CO₂ stunning was introduced because it is far preferable to electric stunning. Pigs and staff are far calmer around CO₂ stunning than electrical stunning. Meat quality, which reflects the level of stress of a pig at slaughter, is far better with CO₂ stunning. During the 2000s, dry sow stalls were phased out of the industry. Stalls were originally introduced because they reduced fighting amongst sows, and actually they were introduced here principally because of research in France. So the Europeans are not always ahead of us. It is not a simple or straightforward thing to change the infrastructure of an industry, as the pig vets pointed out.'

CO₂ stunning

CO₂ stunning is widely acknowledged by experts and scientists to offer significant welfare benefits compared to alternative pre-slaughter stunning methods.

Approved methods for slaughtering livestock in Australia are grounded in scientific research. Over the past two decades, there have been numerous research projects conducted to find alternative gases to CO₂ stunning, but no alternative gases are yet available commercially that provides animal welfare benefits over CO₂. This is due to its ability to effectively manage pig droves, requiring minimal human intervention and thereby reducing stress levels. CO₂ stunning is widely regarded as the best practice globally and is extensively employed in Europe, the United States, and Canada. Contrary to calls for its phase-out, submissions from the RSPCA did not advocate for discontinuing CO₂ gondola systems. Furthermore, a recent literature review conducted by the New South Wales Department of Primary Industries affirmed CO₂ stunning as one of the preferred methods for pig stunning, a sentiment reiterated by the World Organisation for Animal Health. The endorsement of CO₂ stunning extends beyond industry voices, with third-party organisations also lending support to its efficacy.

In its submission, Australian Pork Limited contended that:

'Over the past two decades, there have been numerous research projects conducted to find alternative gases to CO₂ stunning, but no alternative gases are yet available commercially that provides animal welfare benefits over CO₂. The issues reported with alternative gases and mixtures include longer stunning times, shorter stun-to-stick intervals, conflicting results regarding aversion signs, higher cost of gases, difficulty in handling lighter gases than air, and the negative impact on meat quality and the environment'¹⁸.

Margo Andrae from Australian Pork Limited also said:

'Pre-slaughter stunning is recognised as a humane part of the end-of-life process by the World Organisation for Animal Health. This is something that our industry cares deeply about. Any stunning system should not be examined in isolation but must consider animal handling and

¹⁸ Australian Pork Limited submission no. 543, page 33.

worker health and safety. While we always review and seek alternatives, carbon dioxide stunning is the best option for animal welfare¹⁹.

Edison Alvares, the Chief Operating Officer for JBS Pork Division/Rivalea said during his opening statement at a hearing that:

'This brings me to CO₂ stunning, which is a proven method of stunning, best practice worldwide and endorsed by the World Organisation for Animal Health, the global authority on this matter. Although it is not perfect, CO₂ stunning is the best and most balanced available method to humanely stun a pig²⁰.

During a public hearing, AMIC said:

'Approved livestock slaughter practices in Australia are based on scientific evidence. There are no current alternatives to carbon dioxide stunning in pigs which can provide on balance the most humane stunning of animals in most settings. Importantly, pigs are herd animals. CO₂ stunning allows for pigs to be handled in groups and requires the least amount of human interaction. This is critical for minimising pig stress. For these reasons CO₂ stunning remains a global best practice and the most commonly used method for stunning pigs around the world, including in Europe, the United States and Canada²¹.'

FINDING FOUR: CO₂ stunning is currently recognised as best practice and the most viable option, based on extensive scientific evidence. Continuous research funded by the pig industry aims to explore emerging alternatives, ensuring the adoption of any superior techniques in the future.

FINDING FIVE: Banning CO₂ stunning would contradict scientific consensus, cause economic damage, and reduce food security in Victoria.

RECOMMENDATION FIVE: That the Victorian Government allocate funding to Australian Pork Limited to support ongoing research and development of commercially viable alternatives to the use of CO₂ in stunning pigs prior to slaughter, with a requirement to report on these alternatives no later than May 2026.

¹⁹ Margo Andrae, Australian Pork Limited, public hearing, 13 March 2024. *Transcript of evidence*, page 2.

²⁰ Edison Alvares, public hearing, 13 March 2024. *Transcript of evidence*, page 37.

²¹ Tim Ryan, Australian Meat Industry Council, public hearing, 13 March 2024, *Transcript of evidence*, page 14.

The Animal Care and Protection Bill

If passed by the Victorian Parliament, the Animal Care and Protection Bill will replace the existing *Prevention of Cruelty to Animals Act 1986 (POCTA Act)*²². All regulations under the new Animal Care and Protection Act should be consistent with the Australian Model Code of Practice for the Welfare of Animals: Pigs. Aligning regulations with a code of practice ensures uniform standards across the industry, providing clear and consistent guidelines for pig welfare. The current code and regulations already offer comprehensive guidelines covering various aspects of pig welfare, including housing, nutrition, health care, and handling practices, with further reviews and subsequent changes pending.

In its joint submission with the Department of Energy, Environment and Climate Action, PrimeSafe explains that it is ‘the Victorian statutory authority for regulating the processing of meat, poultry and seafood in Victoria’²³. In the joint submission, it was stated that:

*The AWTG has committed to the development of Australian Animal Welfare Standards and Guidelines for Pigs (Pig S&G) as part of its workplan, with timings yet to be determined. Once developed, the Pig S&G would replace the current MCOP and Victorian Pig Welfare Standards*²⁴.

All pig farmers the Committee heard from prioritise the welfare of the animals on their farms, adhering to current legislation, guidelines, and APIQ accreditation to ensure the best animal welfare outcomes.

Victorian Pig Farmer, Tim Kingma said during a public hearing:

‘Having farmed animals since childhood, the first consideration we have is for the health and welfare of our animals.’

Judy Croagh, from Western Plains Pork during a public hearing said:

‘... I do know that every pig farmer I have ever met cares deeply about their pigs and is dedicated to what they do.’

Judy Croagh also said:

‘Every day I come to the farm to work alongside some amazing people who care deeply about the pigs, the environment and the community we work with’

Edison Alvares, CEO of JBS Australian Pork Division said:

²² Engage Victoria, *Reforming Victoria’s animal care and protection laws*. [Reforming Victoria’s animal care and protection laws | Engage Victoria](#)

²³ Department of Energy, Environment and Climate Action and Primesafe Victoria submission no. 425, page 4.

²⁴ Department of Energy, Environment and Climate Action and Primesafe Victoria submission no. 425, page, 13.

‘We take animal welfare very seriously. We are focused on the sustainable production of pork, which includes an uncompromising commitment to animal welfare for every animal under our care every day.’

Trevor Pisciotto from Agriculture Victoria told the Committee:

‘The Animal Care and Protection Bill does not propose to have a specific exemption for the Meat Industry Act, which is currently provided for under POCTA. That is because it is anticipated that the regulations under the Animal Care and Protection Act and future PrimeSafe licences will both reference that national standard for livestock processing. So essentially the two schemes, the food safety scheme administered by PrimeSafe under the Meat Industry Act and the animal care and protection legislative scheme administered by Agriculture Victoria in respect to livestock, will be applying the same national standard.’

Key provisions of the bill should focus on restricting third-party litigation, therefore, safeguarding agricultural operations from external parties who may lack direct involvement or legitimate standing in the industry. Additionally, the bill should implement measures to limit vexatious and frivolous legal action, specifically targeting serial litigants who frequently engage in baseless legal proceedings. These changes are intended to provide a more stable and secure environment for pig farmers and processors, allowing them to focus on ethical and sustainable farming practices without the constant threat of unwarranted legal disputes by animal extremists who wish to see the pork industry cease operations entirely.

RECOMMENDATION SIX: All forthcoming regulations under the new Animal Care and Protection Act should align with the Australian Model Code of Practice for the Welfare of Animals: Pigs.

RECOMMENDATION SEVEN: The upcoming Animal Care and Protection Bill must incorporate restrictions on third-party litigation against pig farmers and processors, as well as measures to curb vexatious and frivolous legal action by serial litigants.

Biosecurity

Biosecurity is paramount on pig farms, playing a pivotal role in safeguarding the health and welfare of both animals and humans. By implementing rigorous biosecurity measures, farmers can effectively mitigate the risk of disease outbreaks within their pig populations, preventing poor animal welfare outcomes, devastating economic losses and safeguarding food security. However, amidst the diligent efforts of farmers to uphold biosecurity standards, challenges arise from individuals associated with animal rights extremism.

Chris Delforce, representing the Farm Transparency Project, openly admitted to trespassing onto numerous farms and abattoirs across Australia. Such unauthorised intrusions not only pose a direct threat to biosecurity protocols but also undermine the efforts of farmers to maintain the health and welfare standards of their animals.

In his submission, Chris Delforce from Farm Transparency Project stated:

'I have visited 66 slaughterhouses and 109 pig farms across Australia. Most of these visits have been a result of trespass, without the knowledge or consent of the owners of the facilities.'

In addressing the biosecurity risk posed by animal extremists trespassing on farms, Margo Andrae said:

'Keeping the diseases out of the country is first and foremost, to make sure they do not come in, and then dropping that down to our individual farms and making sure those farms are as protected as they can be – and that is for everything, from who walks on there, what parcels come on. You shower on and shower off for a lot of our farms, so we are incredibly protective around that. That is why some of the illegal activity does actually pose such a threat as well.'

Yvette Pollock from the Australian Veterinary Association stated:

'Biosecurity is really critical. I would say that we are certainly the experts on biosecurity, so we can answer all your questions about how people get in and out of farms. I suppose one of the things is that these are not protocols that you can just guess. You cannot just assume what they are when you arrive at the farm, and there is a process for if you are going to visit a farm. There is a pre-visit questionnaire that people will take you through to work out what your risk level is. That will be around what pig exposure you have had if any. It will be around whether you are vaccinated against influenza. It will be around where your vehicle has been, where your boots have been, whether you have been overseas. All of those things come into this risk assessment. Then if you pass that and you are able to enter the farm, we have high-health farms where you have to shower in and shower out and you are wearing the boots and the clothing for the farm, sometimes down to the underwear, depending on the site²⁵.'

Pig farmer, Martin Clark said:

'Just a little thing – we have changed our farm layout so you do not drive through the piggery to go around the farm. The piggery is isolated in its own area from other people that come to our

²⁵ Yvette Pollock, public hearing, 26 March 2024. *Transcript of evidence*, page 31.

farm. We have got a vehicle designated on farm for taking visitors around, so no-one is allowed to drive around in their own vehicles – and not through the piggery. The rest of the farming enterprises have got their own tracks to keep away²⁶.

Mhairi Roberts from RSPCA Victoria when talking about her visit to Tim Kingma’s farm last year said:

‘They had very strict biosecurity practices. We showered in and showered out of that farm and they made sure that we were provided with clothing to wear as well. So we very much acknowledge the importance of biosecurity and the need for that on-farm and we know that it also has an animal welfare implication as well to have good biosecurity practices²⁷.’

Judy Croagh from Western Plains Pork during a public hearing said:

‘Biosecurity is also of the utmost importance. Because of the way we produce our pigs alongside farms with sheep and cattle we are mindful of protecting not only our pigs but the other animals farmed in the area. When any of us travel overseas, we are not allowed back onsite for five to seven days, with all clothing, footwear and suitcases cleaned with disinfectant, which the company provides. If anyone is coming onto the farm we use a biosecurity app, ExoFlare. ExoFlare was introduced to Western Plains Pork through Australian Pork Limited, or APL. It is a very simple app to use, asking questions to help us decide who can enter the farm and when²⁸.’

Chris Richards, Managing Director and a consultant pig veterinarian for Apiam Animal Health, with 27 years caring for pigs, told the Committee:

‘Producers put in a lot of different systems to prevent animals, feral pigs and other things, coming into farms, whether it is bird netting and things like that as well. There is a lot of expense in putting in biosecurity systems. The impact of a biosecurity breach depends on the pathogen, but it is huge. It is not \$10,000 or \$100,000. I mean, for a significant breach we can be talking millions of dollars, and in the right circumstances it can be enough to bankrupt a farm.’

John Pluske told the Committee:

‘I remember being at a conference in the USA about 10 or 11 years ago, and there was an outbreak of an extremely serious disease called porcine epidemic diarrhea virus, which actually is a coronavirus. The veterinarian that was giving the presentation was basically in tears as he showed pictures of truckloads and trailer loads of dead piglets – mortality could be 100 per cent with PEDV. This was completely unseen; there were cases earlier in Europe in the 1990s and 2000s, but this was an unintended introduction of this virus into the USA. It absolutely devastated the industry for many years. I guess with biosecurity there is that risk of the unknown. Dr Richards gave the example of ASF, but there are other diseases that you just do not know, and hence biosecurity has to be taken extremely seriously.’

²⁶ Martin Clark, public hearing, 13 March 2024. *Transcript of evidence*, page 56.

²⁷ Mhairi Roberts, RSPCA Victoria, public hearing, 26 March 2024. *Transcript of evidence*, page 18.

²⁸ Judy Croagh, Western Plains Pork, *Transcript of evidence*, page 50.

Illegal farm trespassing by animal extremists

Establishing laws that impose tougher penalties for illegal activists trespassing on farms is crucial for the well-being of producers and their livestock. Trespassing incidents not only disrupt farm operations but also cause significant mental anguish for farmers and their staff, who face constant anxiety over potential invasions and the safety of their livelihood. By ensuring the enforcement of minimum penalties, the Victorian Government can deter illegal activities and provide a sense of security to those who work in the agricultural sector. Stronger legal protections will help maintain the integrity of farming operations, allowing farmers and their employees to focus on their work without the fear of harassment or damage caused by animal extremist trespassers.

Tony Peacock, Chairman of the Australian Pork Research Institute Limited told the hearing:

'The Australian government has vastly increased penalties for people bringing pork into Australia – any meat products. We now turn around the odd person and send them home for bringing it, and the fines have gone up really substantially. I think it would be a good recommendation to increase the penalties for biosecurity breaches. There are not that many industries that can actually cease to exist due to a disease or something coming in. It is an existential threat to the industry. They take it incredibly seriously. That is why people react so badly to these farm invasions, because they are being so careful every day. They are telling their employees, 'Be careful.' They are really vigilant about this stuff. And to be invaded and have people just dismiss it as 'Oh, we change overalls' or that sort of thing, for somebody to say 'I broke the law 91 times and I'm going to continue to do it' is incredibly distressing to producers.'

Margo Andrae, CEO of Australian Pork Limited said:

'I think we actually underestimate the toll it is taking. As I said, these are people's homes. It is their families. They care for their animals. Even, dare I say it, people attached to the industry – so it is not just the farmers, it is the vets who have to go out and deal with the fallout of issues like this, and staff. My own staff, as we know, have been heavily bullied and harassed by activists. I think if I am really honest, the toll is getting worse because it is the unknown and it is happening and it is bullying. As I said, just imagine sitting on your farm looking after your piglets, and you have masked people coming up your farm towards you. I mean, that is scary. And this is what our farmers live with.'

At some point we have to protect our farmers, we have to protect our food security and we have to protect people who are living by the law. They are doing the right thing. They are really good people. They are kind hearted people who choose to provide food for Australians. I think if we go to the next step, mental health resources in rural and regional communities, where our farmers are, are not readily available. And I do not even know we fully understand the impact on our young people. It is just horrible. So people should have a right to feel safe in their homes. They should have a right to feel safe at work. I think it is just getting more and more unfair that they are losing that right, and I think it is time we stand up for all of our farmers.'

Victorian pig farmer, Tim Kingma presented at the public hearing and said:

'I respect the right of animal activists to have an opinion that is different, but I object that they want to force their ideology on us while doing it illegally.'

Martin Clark, a pig farmer told the Committee:

'Well, it is hard to say what is probably a fair thing here, but if someone broke into your house and did something to you, what would you like to see the penalty be? In the personal view, it is probably never enough. It needs to be enough (a) to deter them and (b) to make it honest. Now, if they have got a belief, that is fine. They should not force it on to others. That goes on not just in this environment but in everyone else's environment. Whether you are a he, she or whatever, it does not matter, everyone to their own, but you should not be forcing it on to somebody else. Everyone is entitled to their own view. It is a democratic society.'

Pork producer Judy Croagh also told the Committee inquiry:

'Biosecurity, as I said, is of the utmost importance. We share land, or neighbour people, with sheep and cattle running on the same place but in a different area of that particular farm. Yes, I would hate any disease outbreaks to happen because of a breach of biosecurity from anyone coming on site. It is intimidating. We have made all staff aware, or they have watched the 7.30 report. They see what has happened, and that just heightens their awareness and makes them a little bit more anxious. As I said, the people I work with every day – or the people we work with – are extremely passionate about animals, and especially about the pigs. So to think that somebody may be trespassing into their area – it does make them anxious.'

Judy Croagh also told the Committee:

'It would be great to have people accountable for breaking in. It is intimidating if you have got people coming into your backyard, because we all see it as our home. We all spend a lot of time there, and we deeply care about what we do. So yes, I think it would be important that people are made more accountable for their actions.'

Chris Richards, Managing Director and a consultant pig veterinarian for Apiam Animal Health, with 27 years caring for pigs, told the Committee:

'Activists illegally entering farms means that our biosecurity measures are undermined, our systems are breached and the risk of introducing pathogens is uncontrolled. For example, if a person had previously visited a piggery with roundworm and they were to wear the same shoes and then set foot on farm, they risk introducing roundworm to the pigs. Adult roundworms compete with a pig for nutrients and interfere with absorption of nutrients. Eggs of roundworm are very resilient, lasting up to 10 years in the right conditions. So this is not a disease that comes and goes; they have got it for life. Bringing them into a farm means the farm will have to treat their pigs against those worms to prevent illness and loss of condition. It is all preventable if biosecurity protocols are adhered to.'

The presence of illegal visitors also causes acute distress to the pigs at the time of the visit. The routine for most farms first thing in the morning is to feed every sow and check them over to ensure that they are healthy and not showing any signs of disease. When activists enter a

farm in the middle of the night with torches and headlamps, the pigs actually think it is breakfast time, and they get quite distressed with the activists moving around, particularly when they do not feed them. The pigs become agitated and vocalise, which you may have seen in some of the illegal footage.

I also cannot underestimate the impact illegal trespassing has on producers. We see considerable stress on caregivers following an illegal biosecurity breach, and why wouldn't they when they spend so much time caring for their pigs? Illegal trespassing compromises our role in improving the health and welfare of pigs. It needs to stop.'

FINDING SIX: Trespassing by animal extremists on farms has caused significant distress to farmers, workers and their families, and poses a biosecurity risk to pigs and other animals on the premises.

RECOMMENDATION EIGHT: The Victorian Government should establish laws imposing tougher penalties for illegal trespassing by activists on farms, mandating the enforcement of minimum penalties.

CCTV

Supporting voluntary installation of CCTV in abattoirs and pig farms while questioning the necessity of mandatory implementation underscores a balanced approach to improving animal welfare without overburdening the industry. While voluntary CCTV initiatives allow farmers to demonstrate their commitment to transparency and ethical practices, mandating such measures could pose logistical and financial challenges.

Installing mandatory CCTV cameras in abattoirs and pig farms may seem like a proactive step towards improving animal welfare standards and fostering transparency in the industry. However, it's crucial to assess the practicality and effectiveness of such measures. While CCTV may offer a sense of assurance to the public regarding the treatment of animals, it's unreasonable to expect it to significantly enhance welfare outcomes. The agricultural sector already operates under strict regulations, independent audits and high compliance rates, ensuring that animals are treated ethically and humanely.

Mandating CCTV will burden farmers with unnecessary expenses and regulatory complexities without substantially improving the already excellent welfare standards. It's essential to recognise the industry's commitment to ethical practices and support a crucial Victorian industry without imposing impractical burdens on farmers.

Tim Ryan from the Australian Meat Industry Council said:

I do not think the general public want to see it. They understand that an animal has to be processed. They want to be assured that it is done humanely and respectfully. They want to know that the regulator has sufficient oversight, but they do not want to see the process necessarily. That is what we hear from consumer research. I think the groups that do want to see it are the ones that we heard from yesterday. We need to strike the right balance in how we can assure consumers in the community that we are doing enough, that we are meeting all our regulatory responsibilities and that the regulator has oversight. But at the same time we need to respect the workplace, and these are people's lives; they come to work every day, and we need to respect their privacy²⁹.

RECOMMENDATION NINE: The use of closed circuit television (CCTV) to be formalised as part of the review of the National Code.

²⁹ Tim Ryan, Australian Meat Industry Council, public hearing, 13 March, 2024. *Transcript of evidence*, page 19.

