

Submission in Response to Victorian State Government's Draft Action Plan 2016-2021 "Improving the Welfare of Animals in Victoria"

Introduction

I thank the Victorian State Government for the opportunity to comment on its Draft Action Plan 2016-2021 "Improving the Welfare of Animals in Victoria".

The key problems addressed by this submission are firstly, that current livestock sector practices run counter to government aspirations as expressed in the plan; and secondly, that the community in general may be unaware of the routine cruelty that is an inherent aspect of livestock production.

If the government is truly concerned about animals, it must meaningfully address both issues, as referred to in more detail below.

Responses to some key points from the Draft Action Plan

1. Protecting animals from cruelty

Lizzie Blandthorn's foreword declares that we must protect animals, including those on farms, from cruelty.

If we do as Ms Blandthorn insists, then we must remove exemptions to the Prevention of Cruelty to Animals (POCTA) Act that permit routine acts of extreme cruelty by the livestock sector.

A major concern is the fact that government statements do not reflect the reality of cruelty to animals used for food production and other purposes.

On its website's POCTA page, Agriculture Victoria states as follows regarding exemptions under the Act in favour of the livestock sector (with my underline):

"There are a number of exemptions built into the POCTA Act for activities undertaken in accordance with other legislation, codes of practice made under this Act, and the Livestock Management Act Standards. However this does not permit cruelty to occur."

I fail to understand how the practices permitted under various statutes, codes and standards could not be considered cruel.

Here are examples:

Model Code of Practice for the Welfare of Animals: Pigs (3rd Edition)

The code permits the following practices, most of which apply routinely to the vast majority of pigs used for food:

- life-long confinement indoors;
- confinement in a sow stall, with insufficient room to turn around, for up to 16.5 weeks, day and night;

- confinement in a farrowing crate, with insufficient room to turn around or interact with piglets, for up to 6 weeks, day and night;
- tail docking without anaesthetic;
- ear notching without anaesthetic;
- teeth clipping without anaesthetic;
- castration without anaesthetic.

The Australian industry's so-called voluntary ban on sow stalls, scheduled to commence in 2017, will allow them to be used for up to eleven days per pregnancy, and will not be binding on individual producers. In any event, the ability to monitor compliance must be questionable.

The industry has not indicated any action in respect of farrowing crates.

Model Code of Practice for the Welfare of Animals: Domestic Poultry (4th Edition)

The code permits:

- life-long confinement indoors, including cages;
- beak trimming of chickens without anaesthetic;
- removing the snood of turkeys (the skin drooping from the forehead) without anaesthetic;
- removing terminal segment of males' inward pointing toes without anaesthetic;
- killing of "surplus" chicks (mainly male) in the egg industry through gassing with CO2 or by "quick maceration". (The Oxford defines "macerate" as "*soften or become softened by soaking in a liquid*". In the case of chicks, there is no soaking in liquid. They are sent along a conveyor belt to an industrial grinder while still alive.)

Australian Animal Welfare Standards and Guidelines for Cattle

The standards permit:

- castration without anaesthetic if under six months old or, under certain circumstances, at an older age;
- dehorning without anaesthetic if under six months old or, under certain circumstances, at an older age;
- disbudding (prior to horns growing) without anaesthetic. Caustic chemicals may be used for that process under certain circumstances, including an age of less than fourteen days;
- hot iron branding without anaesthetic.

In the dairy industry, cows are continually impregnated in order to produce milk. However, the milk is intended for humans, so the cow and calf are separated almost immediately after birth, with the calves either going back into the dairy industry, to veal production or almost immediate slaughter. This process is an inherent component of dairy production and seems almost unimaginably cruel to the cow and calf.



Although not legislated, relevant industries have established a national standard whereby they can avoid feeding calves aged 5 to 30 days, who are being transported without their mothers, for up to 30 hours at a time.

National Animal Welfare Standards for Livestock Processing Establishments

- The standards allow stunning prior to slaughter by: pneumatic captive bolt guns; controlled atmosphere (CO₂) stunning; and electrical stunning
- They state that CO₂ concentration should be greater or equal to 90% by volume, and no less than 80% when gaseous mixtures are used. (Variations are allowed following a monitoring and verification procedure that demonstrates effective stunning.)

The great majority of pigs in Australia are stunned using the CO₂ method.

Many people may wrongly believe that the process is free of pain and stress for animals.

Donald Broom, Emeritus Professor in the Department of Veterinary Medicine at Cambridge University, made the following points after viewing a video recording of the process from an Australian abattoir:

- The use of CO₂ stunning represented a major welfare problem, as the gas is very aversive to pigs.
- The extreme reactions were typical for pigs lowered into a high concentration of CO₂.
- The best gas to use in the stunning chamber is argon, or a mixture of argon and up to 20 per cent CO₂. Pigs do not detect argon, so are stunned without being aware of the gas.
- For financial reasons, efforts are generally made to reduce the time taken to unconsciousness, so CO₂ is often used. It is somewhat cheaper than argon.

From Professor Broom's comments, it would appear that there are options available that would cause less stress to pigs than high concentrations of CO₂, and that many in the industry may be avoiding those methods for financial reasons.

Forced breeding

Globally, we currently breed and slaughter around 70 billion land animals annually, compared to a human population of around 7.4 billion. The livestock reproduction rate dwarfs natural levels, and involves abuse and confinement on a massive scale, even for so-called "free range" systems.

2. Informing the community

In the plan's introduction, the authors claim that the community generally supports "*the many roles animals play in our lives*", including food and fibre production.

However, would community members support those "*many roles*" if they knew the animals experienced routine cruelty?

The government's failure to reflect the reality of animal-based food production processes (referred to earlier) may cause the community in general to be unaware of the extent of cruelty involved in their purchasing decisions. It is essential that they be informed, to enable them to take the cruelty into account in those decisions.

The plan refers to knowledge gaps in the community and the need for communications, training and guidance. Those measures are essential in order to inform people of their role in animal cruelty.

Evidence-based public relations and advertising, along with realistic product labelling, are some of the specific approaches that could be adopted.

Other issues

A reduction in animal-based food consumption and production would also provide benefits in terms of the environment (including climate change), human health and social justice.

Environment

Producing animal-based foods affects the environment in dramatic ways. Here are some examples of UN bodies highlighting concerns over many years:

“[Animal food products] place undue demand on land, water, and other resources required for intensive food production, which makes the typical Western diet not only undesirable from the standpoint of health but also environmentally unsustainable.” **The Food and Agriculture Organization of the United Nations (FAO) and World Health Organization (2001)**

“[Livestock production] is one of the major causes of the world’s most pressing environmental problems, including global warming, land degradation, air and water pollution, and loss of biodiversity.” **The Food and Agriculture Organization of the United Nations (FAO, 2006)**

“[A new UNEP report] calls for a significant shift in diets away from animal based proteins towards more vegetable-based foods in order to dramatically reduce pressures on the environment” . . . “. . . substantial reduction of impacts would only be possible with a substantial worldwide diet change, away from animal products.” **United Nations Environment Programme (2010)**

In terms of climate change, livestock production’s impacts arise from many inter-related factors, such as its inherent inefficiency as a food source; the massive scale of the industry; land clearing far beyond what would otherwise be required to satisfy our nutritional requirements; greenhouse gases such as carbon dioxide, methane and nitrous oxide; and other warming agents such as black carbon.

Human health

The detrimental health impacts of animal-based foods have been well documented by organisations such as the World Cancer Research Fund, the World Health Organization, and others.

A recent example was the April 2016 study by researchers from the Oxford Martin School (University of Oxford) reporting on the health and climate change benefits of changing diets, including reduced consumption of animal products.

The researchers estimated that if the global population were to adopt a vegetarian diet, 7.3 million lives per year would be saved by 2050. If a vegan diet were adopted, the figure would be 8.1 million per year.

More than half the avoided deaths would be due to reduced red meat consumption. The results would primarily reflect reductions in the rate of coronary heart disease, stroke, cancer, and type 2 diabetes.

Social Justice

The issue of social justice was highlighted in a 2013 paper from the Institute on the Environment at the University of Minnesota, which stated:

“The world’s croplands could feed 4 billion more people than they do now just by shifting from producing animal feed and biofuels to producing exclusively food for human consumption”.

Animal feed crops represent 90% of that figure (in turn representing 3.6 billion people), and biofuels only 10%.

The FAO estimates that around 795 million people were chronically under-nourished in the period 2014-2016.

The lead author of the University of Minnesota paper, Emily Cassidy, has said:

“We essentially have uncovered an astoundingly abundant supply of food for a hungry world, hidden in plain sight in the farmlands we already cultivate. Depending on the extent to which farmers and consumers are willing to change current practices, existing croplands could feed millions or even billions more people.”

Conclusion

I am hopeful that the Victorian State Government’s latest initiative will contribute to a change in practices whereby animals are no longer exploited, with benefits to the animals themselves and the community in general.

Paul Mahony
Melbourne, Australia
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Images

Branding a calf | © anrodphoto | iStock

Morning mist © Anekoho | Dreamstime.com

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