



08 Jan 2024

Georgie Purcell  
Chair  
Legislative Council Economy and Infrastructure Committee  
Parliament House  
Spring Street  
EAST MELBOURNE VIC 3002

By email: [eic.council@parliament.vic.gov.au](mailto:eic.council@parliament.vic.gov.au)

Dear Ms Purcell,

**RE: Inquiry into pig welfare in Victoria**

The JBS Australian Pork Division is pleased to contribute to the Legislative Council Economy and Infrastructure Committee's inquiry into pig welfare in Victoria. JBS Australia is the largest meat and food processor in Australia with more than 15,000 team members and a strong portfolio of leading beef, lamb, pork, salmon, and value-added branded products. JBS globally is the largest animal protein business and one of the largest food companies in the world, with operations in North America, South America, Europe, Australia, and New Zealand.

JBS Australia's Pork Division includes the Rivalea pig breeding and progeny raising enterprise along with pork processing facilities at Rivalea in Corowa, Diamond Valley Pork in Melbourne and Seven Point Pork at Port Wakefield in South Australia. We are a major employer in Victoria, providing approximately 500 secure and rewarding local jobs and career opportunities for our community and are a leader in the Australian pork sector with a strong team and track record of sustainable pork production. We are committed to building on these foundations and creating new opportunities for high welfare, resulting in delicious Australian-grown pork for our consumers.

Our business has a 50-year proud history of being part of the Riverina area and Victoria, and to ensure we continue to be a part of these communities for years to come we are investing a considerable amount of money, time and effort across the Pork Division sites over the next five to 10 years.

The investment, which is subject to local government regulatory approvals, includes:

- Upgrading pig housing and processing systems to benefit pig health, welfare and people safety;
- Best practice animal handling systems;
- Upgrading biosecurity systems, to further reduce the risk of disease; and
- Upgrading employee amenity facilities.



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## Response to the Terms of Reference

### **(1) The scope, application, compliance with and enforcement of relevant existing regulatory frameworks and their ability to promote pig welfare outcomes.**

All pigs farmed in Australia fall under the governance of the Australian Model Code of Practice for the Welfare of Animals – Pigs (the Code), approved in April 2007. The Code provides a foundation for the Victorian Standards and Guidelines for the Welfare of Pigs and underpins the Welfare Standards in the Australian Pig Industry's independently audited Quality Assurance Program, APIQ®, which apply to pigs kept under both indoor and outdoor systems. While the Model Code outlines the minimum welfare standards, the APIQ® Welfare Standards exceed the standards set out in the Code and over 90% of commercial Australian pig producers are APIQ® accredited. Accreditation under APIQ® requires an audit by an independent certification body (AUS-MEAT), with six (6) monthly internal audits also mandated. This quality assurance program ensures JBS Australia's pork operations meet legal requirements, industry standards and customer specifications in the areas of animal welfare, environment, food safety, biosecurity and traceability.

Within our pork processing facilities, our business meets and exceeds the requirements as set out in the Export Control Act 2020, the Australian Standard for the Hygienic Production & Transportation of Meat and Meat Products for Human Consumption (AS4696-2023), in particular Part 3 Section 7 – Animal Welfare and the Model Code of Practice for the Welfare of Animals – Livestock at Slaughtering Establishments – SCARM Report 79 (2002). We are accredited under the Australian Livestock Processing Industry Animal Welfare Certification System (AAWCS) which ensures humane processing of livestock at our facilities. We are audited annually by an independent certification body (AUS-MEAT) to ensure these requirements are met.

Animal welfare forms a crucial part of our Quality Management System. Our Quality Assurance teams conduct daily welfare audits of pigs including stockperson handling, vocalisations, slips, sensibility checks of pigs post-stunning, along with training and competency assessments of all operators involved in the humane processing of livestock. All three (3) of our processing facilities are export accredited, which requires regulatory oversight, conducted by the Department of Agriculture, Fisheries and Forestry (DAFF). DAFF have a continuous presence in each of our processing facilities with DAFF On Plant Veterinary Officers responsible for verifying compliance against these standards and certification requirements. Additionally, DAFF Area Technical Managers audit our facilities on a biannual basis.

Our business places a high priority on training and comprehensive training programs are mandated under the Welfare Standards in APIQ® and AAWCS. These programs ensure a culture of continuous improvement and ethical pig handling where pig welfare is a priority. Furthermore, we have rolled out ProHand® training across our farming and meat processing sites which has improved the quality of human-animal interactions, animal performance, welfare and stockperson work motivation, performance and job



JBS Australia has an uncompromising commitment to animal welfare and is committed to caring for every animal under our care, every day. Leading animal welfare standards are ingrained in our culture. The globally recognised 'Five Domains' framework guides our animal welfare policies and practices, to ensure the needs of all animals under our care are met.

The Five Domains are:

1. Nutrition
2. Environment
3. Health
4. Behavioural Interactions and
5. Mental state/experiences.

The Group adheres to its commitment to animal welfare by:

- complying with its legal obligations, the relevant Australian animal welfare standards and where applicable, accreditation programs;
- the guidance of our team of highly qualified specialists including Veterinarians, Nutritionists, Animal Scientists and Animal Health / Welfare Officers;
- having systems that deliver high standards of animal welfare, maintaining the needs of animals at all times;
- providing Team Members with animal welfare training that enhances positive interactions towards animals;
- regularly reviewing and updating the animal welfare training material;
- fostering an environment where Team Members are encouraged to show empathy towards animals;
- daily monitoring of animals and supervision of Team Members working with live animals;
- implementing systems and living environments that offer the animals greater opportunity to experience appropriate normal behaviour and enhanced welfare; and
- regular internal maintenance reviews of facilities and equipment used in the handling of animals.

The needs of animals include providing for the following:

- good health and nutrition;
- access to clean water;
- shelter and protection from extreme weather conditions and predators;
- adequate space, light/photoperiod, air/water quality in the living environment;
- hygienic and safe living environment;
- positive social contact with other animals; and
- humane handling.

We take any reports of animal welfare issues very seriously and have a zero-tolerance approach to any animal welfare breaches. JBS will investigate any reported matters thoroughly and take appropriate action.





satisfaction. Daily visual and remote CCTV monitoring of our animal handling performance is conducted.

**(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.**

The JBS Pork Division endorses and uses best practice CO<sub>2</sub> stunning as it aligns with the welfare guidelines of the World Organisation for Animal Health (WOAH), the global authority on this matter. According to WOAH guidelines, animals must be unconscious during the slaughtering process to minimise undue pain during bleeding, deeming CO<sub>2</sub> stunning a safe and welfare-effective protocol for pigs.

Worldwide, a variety of stunning methods are approved for use, however CO<sub>2</sub> and electrical stunning are the two most widely used methods by far. With electrical stunning, pigs must be handled individually, leading to greater fear amongst those animals being separated from the cohort of pigs. With CO<sub>2</sub> stunning, human contact is minimised and there is no need to separate the pig being stunned from the group, as they are stunned together, which reduces fear for the pigs. Other gases have been investigated as an alternative to CO<sub>2</sub> for stunning, but for many reasons (including, gas rarity, stability, human safety, effect on meat quality) none have been allowed for stunning of pigs at slaughter in the EU. Currently CO<sub>2</sub> stunning is the only gas stunning permitted globally; no other gas has been approved for stunning in pig processing.

By June 2024, all our three meat processing plants will have international best practice group CO<sub>2</sub> stunning systems, which has required an \$8M investment from our business. This investment has assured our community and customers that we are here for the future producing high quality, humanely produced pork, and providing secure employment for people in our communities.

**(3) The outcomes of the 2017 industry-led phase out on the use of sow stalls**

The JBS Australia Pork Division was proud to lead the Australian pig industry on the journey to voluntarily phase out of sow stalls (i.e., gestation stalls). We made the commitment in 2007 and all gestation stalls were removed by 2014. This required a significant capital investment which has resulted in improved performance of our pigs and enhanced welfare for our sows.

**(4) Current industry breeding and housing practices particularly the use of different forms of confinement**

The JBS Pork Division adheres to the housing requirements outlines in the Model Code of Practice for pigs. We have two types of housing systems including indoor housing



where pigs are raised in environmentally managed sheds in group housing and deep bedded group housing, where pigs are raised in naturally ventilated sheds in large groups on bedding (% 68 of growing pigs), typically straw or rice hulls. All our commercial pigs are housed in social groups which enables them to move freely and perform natural social behaviours.

During the mating period our sows are housed in groups or in a mating station to enable mating procedures to occur safely. After mating, sows remain in group housing where they are carefully cared for during their pregnancy. During the birth and lactation period, our sows and piglets are housed in specially designed accommodation (farrowing crates) to ensure piglets are protected. Our sows are provided nest building material to enable them to perform important natural maternal behaviours prior to giving birth. Weaning typically occurs between three and four weeks of age and weaned pigs are moved to specialised indoor housing or bedded systems. Any pig identified as requiring extra care according to veterinary guidelines are placed in specialised animal recovery programs.

JBS is committed to continuous improvement in animal welfare and has conducted extensive research and development over the past 15 years, developing systems that reduce confinement, particularly in the areas of sow group housing and group mating systems, commercially viable loose farrowing systems that meet the needs of the three stakeholders: the sow, piglet and stockperson.

#### **(5) International comparisons to determine industry adherence to best practice standards.**

The unique operating environment of Australian agricultural production systems needs to be carefully considered rather than agreeing to mandates based on comparison with other countries agricultural production environments. It is important that any advice provided to the government is grounded in the latest science, with a particular focus on understanding the unique operating environment of Australian agricultural production systems.

The Australian pork industry has and will continue to learn from our international colleagues and where appropriate investigate and adopt international research, following carefully assessing the impact of practices for suitability under Australian conditions.

#### **(6) Any other relevant matter**

Pork is the second most consumed protein in Australia. Our sector contributed \$488 million (value-added) to the Victorian economy in 2021-22 and 2,699 full time jobs. It's not just about the money – Australian pork is recognised as a low-emissions protein, aligning with global efforts to promote sustainable and environmentally friendly food sources.

JBS Australia is proud to lead continuous improvement in welfare in the Australian pork industry. Our proactive leadership was demonstrated in 2011, when we received the



Compassion in World Farming–Good Farm Animal Welfare Award for our commitment to remove gestation stalls from our housing systems. This successful change to sow housing was based on our commitment to continuous improvement and a robust, collaborative research program.

We work closely with our customers, animal welfare groups and the community to identify areas for improvement and develop our welfare program direction. Our leadership is strengthened through our involvement in Australian Pork Limited (APL), the University of Melbourne Animal Welfare Science Centre (AWSC), Australasian Pork Research Institute Ltd (APRIL) and the Victorian and New South Wales Farmers Federation.

We strongly advocate that any alterations to existing legal frameworks are based on robust science. We operate one of the largest private Research and Innovation groups in the Australian pig industry and have made a significant contribution to pig welfare research over the past 30 years. Our business has invested heavily in collaborative Welfare R&D, particularly in the areas of reducing confinement, reducing pain of husbandry procedures, developing best practice guidelines for CO<sub>2</sub> stunning, developing enrichment programs for pigs, and more recently investigating the elimination of pig tail removal, developing smart technologies that are able to monitor the health and welfare of pigs and novel vaccines to improve herd health and welfare. Our impactful, collaborative research program has delivered positive outcomes for our pigs, particularly in areas of sow housing, pig enrichment programs and developing best practice guidelines for CO<sub>2</sub> stunning.

The JBS Pork Division is dedicated to working alongside the Victorian Government to establish fair and sustainable legislation that safeguards the welfare of pigs, Victorian people, our communities, that support a sustainable and commercial Australian Pork Industry. We reaffirm that any consideration of legislative change must also acknowledge the indispensable role of pig farming and processing within the wider Victorian community and ensure that critical stakeholders are involved in these dialogues.

Thank you for the opportunity to provide input during the consultation phase for the inquiry. Please do not hesitate to contact me for any further assistance.



Edison Alvares  
Chief Operating Officer  
JBS Pork Division