

# **The Parliamentary Inquiry into pig welfare in Victoria: A joint submission on behalf of the Department of Energy, Environment and Climate Action and PrimeSafe Victoria.**

We acknowledge and respect Victorian Traditional Owners as the original custodians of Victoria's land and waters, their unique ability to care for Country and deep spiritual connection to it.

We honour Elders past and present whose knowledge and wisdom has ensured the continuation of culture and traditional practices.

DEECA is committed to genuinely partnering with Victorian Traditional Owners and Victoria's Aboriginal community to progress their aspirations.



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# Glossary

Unless indicated, the definitions in the glossary are adapted from the *Pig Welfare Standards (Revision 1, 2012)*

<b>Boar</b>	An uncastrated male pig over 9 months of age.
<b>Crate</b>	Crates are used as independent pieces of equipment and are purpose-designed for confining pigs for a number of husbandry procedures, including weighing, handling for veterinary interventions, farrowing and assisting with other reproductive processes.
<b>Deep litter</b>	A type of group housing system where pigs are kept on a deep layer of bedding material, usually straw or sawdust.
<b>Dry sow</b>	A female pig that has been mated and has yet not farrowed (given birth).
<b>Dry sow stall (or gestation sow)</b>	An enclosure where gilts and sows are individually kept. Stalls are normally joined together in rows and may be used for total confinement or allow the pig free choice of access. In addition, the period of confinement may vary from part of the pregnancy to the entire pregnancy. The period of confinement is limited in Victoria to a maximum of 6 weeks.
<b>Elective husbandry procedures</b>	This includes castration, tail docking, clipping of the needle teeth, nose ringing, identification, back fat measurement, pregnancy diagnosis and tusk trimming.
<b>Farrowing</b>	Giving birth to piglets.
<b>Farrowing crate</b>	An enclosure closely related to the sow's body size where sows are individually kept during and after farrowing.
<b>Gestation</b>	The period when a sow is pregnant.
<b>Gilt</b>	A young female pig selected for reproductive purposes, before she has been mated.
<b>Husbandry</b>	Care and management practices in pig keeping.
<b>Lactating sow</b>	A sow that has given birth and is producing milk to feed her piglets.
<b>Lairage</b>	The part of a slaughterhouse or abattoir used for the admission or confinement of animals.
<b>Pen</b>	An enclosure for confining pigs which provides sufficient space for them to turn around, which may be used for housing pigs in groups, housing boars individually, management purposes such as mating or farrowing, or for individually confining pigs.
<b>Piglet</b>	A pig up to the time it is weaned from the sow.
<b>Sow</b>	An adult female pig that has given birth to at least one litter. This includes a mated gilt that is confirmed pregnant but yet to give birth.
<b>Stall</b>	An enclosure closely related to the pig's body size where gilts, sows and boars are individually kept. Stalls are normally joined together in rows and may be used for total confinement or allow the pig free choice of access.
<b>Sticking</b>	The severing of the large blood vessels to induce effective bleeding. <sup>1</sup>
<b>Stock person</b>	A person who undertakes the day-to-day husbandry tasks associated with looking after pigs.
<b>Weaning</b>	The act of permanently separating piglets from the sow.

<sup>1</sup> Australian Standard for the hygienic production and transportation of meat and meat products for human consumption FRSC Technical Report No.3 AS4696:2007, Part 1, 1.3

# 1. Introduction

This joint submission has been prepared by Agriculture Victoria and PrimeSafe, as the Victorian regulators primarily responsible for the oversight of pig welfare and food safety in Victoria.

## 1.1 Agriculture Victoria, DEECA

Agriculture Victoria sits within the Department of Energy, Environment and Climate Action (DEECA) and works in partnership with farmers, industries, communities and other government agencies to grow and secure agriculture in Victoria.

Agriculture Victoria has a range of regulatory responsibilities and strives to be a consistent, responsive and trusted regulator that acts appropriately and proportionally. It works with regulated parties, regulating partners, industry and the community.

Where appropriate, Agriculture Victoria adopts non-regulatory approaches, with the aim of ensuring that regulation supports and encourages business rather than hinders innovation and growth.

In relation to the welfare of pigs, Agriculture Victoria is responsible for administering and enforcing the *Prevention of Cruelty to Animals Act 1986* (POCTA Act) and the *Livestock Management Act 2010* (Livestock Management Act). Agriculture Victoria also administers the *Meat Industry Act 1993* (Meat Industry Act).

Agriculture Victoria regulates to:<sup>2</sup>

- Protect and improve animal welfare.
- Minimise food safety risks.
- Protect plant, animal and human health and Victoria's environment from harm, such as biosecurity threats, emergencies, risks associated with chemical usage and reduction in biodiversity.
- Support jobs and the long-term success of industries and businesses, promote productivity and trade and leverage Victoria's competitive strengths.
- Support community, consumer, and global trading partner confidence in Victorian agriculture and animal welfare standards.
- Fulfil the State's legislative obligations.

In administering the POCTA and the Livestock Management Acts, Agriculture Victoria regulates all livestock industries for welfare purposes, including for commercial, hobby, lifestyle and pet purposes. This includes pigs that are kept as pets, in small hobby farms or kept for other purposes such as exhibition.

Agriculture Victoria is part of extensive local, national and international standards that share the responsibility of ensuring a safe, secure, and thriving Victorian agricultural sector that protects animal welfare and promotes biosecurity. Coordination of regulatory bodies is critical to minimising duplication within the regulatory network, ensuring adequate regulatory oversight in line with public expectations, and maintaining confidence in food produced in Victoria.

Other organisations that also have a regulatory role in relation to the welfare and management of pigs are the Royal Society for the Prevention of Cruelty to Animals (RSPCA) Victoria and PrimeSafe.

## 1.2 RSPCA Victoria

RSPCA Victoria provides regulatory services on behalf of the Victorian Government and is empowered under the POCTA Act and parts of the *Domestic Animals Act 1994* to investigate animal welfare reports. These arrangements are covered by a Memorandum of Understanding (MOU) which sets out RSPCA Victoria and

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<sup>2</sup> [Agriculture Victoria Regulatory Approach 2022-2027](#)

DEECA's agreement on a range of matters, including the type of animal welfare cases that RSPCA is responsible for investigating.<sup>3</sup>

In relation to the welfare of pigs, RSPCA Victoria is responsible for investigating complaints that involve 10 or less pigs. RSPCA Victoria is expected to submit a separate submission to the inquiry and therefore RSPCA investigations have not been included in this submission.

## 1.3 PrimeSafe

PrimeSafe is the Victorian statutory authority responsible for regulating the processing of meat, poultry and seafood in Victoria. Established under the *Meat Industry Act 1993*, PrimeSafe's functions include:<sup>4</sup>

- 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 businesses.
- Approving quality assurance programs and monitoring the implementation of those programs.

In exercising its licensing functions, PrimeSafe requires those who operate meat processing facilities to comply with conditions directed at ensuring the safety of food. PrimeSafe regulates animal welfare in facilities, but only so far as a licensee is required to meet animal welfare standards as a condition of licence.

Licensees are typically required to comply with any Australian Standard relevant to the conduct of their business, and those standards may in turn make provision for the handling or treatment of animals at meat processing facilities, including animal welfare requirements.

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

The Commonwealth, through the Department of Agriculture, Fisheries and Forestry (DAFF), supervises the processing of pigs in export abattoirs. A memorandum of understanding (MOU) between DAFF and Primesafe describes this on-plant supervisory role.

## 1.4 Terms of reference

This submission provides information relating to the six (6) Terms of Reference the Victorian Legislative Council Economy and Infrastructure Committee will examine during the Inquiry:

- (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.
- (6) Any other relevant matter.

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<sup>3</sup> MOU between the RSPCA Victorian and DEECA – 1 July 2019

<sup>4</sup> *Meat Industry Act 1995 s1*

## 2. Victoria's pig industry

### 2.1 Non-commercial pig keeping

Pigs are kept in Victoria for a variety of reasons, including as pets or in mobile petting farms across the State. The POCTA Act applies to the welfare of all pigs, regardless of why they are kept.

While it is difficult to provide the exact number of pigs kept as pets or in mobile petting farms in Victoria, the number of properties holding pigs can be estimated using Agriculture Victoria's Property Identification Code database in conjunctions with the National Livestock Identification System database that houses pig movements data.

All pig owners, regardless of the intend use of the pigs, must comply with the National Livestock Identification System (Pigs). The NLIS (Pigs) was developed to manage food safety and biosecurity risks associated with the movement of pigs between properties and venues.<sup>5</sup> The *NLIS (Pigs) Standards – 2022 edition* specifies the standards for the operation of the NLIS Pigs in Victoria. The Standards apply to:

- all domesticated pigs including pigs kept as pets and whole carcasses of dead pigs,
- their movements between properties where one or both locations are in Victoria; and
- persons responsible for their management, husbandry and/or their dispatch to, receipt at and transportation from properties, including Victorian farms, residential properties, saleyards, transit depots, assembly points, artificial breeding centres, veterinary practices, export depots, knackeries, abattoirs and agricultural show venues.<sup>6</sup>

The NLIS Pigs require all pig owners and keepers to have a Property Identification Code (PIC), which identifies the property where pigs are kept, and a pig tattoo brand registered to the PIC. Pigs are physically identified as part of the NLIS (Pigs) using a tattooed slap brand or accredited NLIS (Pigs) ear tag. For welfare reasons, tattoo brands are only permitted to be applied to pigs that are heavier than 25 kg, while tags are used for pigs under 25 kg.<sup>7</sup>

In December 2023, Victoria's PIC register estimated a total of 3000 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.

The commercial pig industry in Victoria is detailed in Section 2.2 (below).

### 2.2 Value and size of the commercial pig industry



The national representative body for Australian pig meat producers, Australian Pork Limited (APL) has estimated that the pig industry contributed \$5.5 billion to the Australian economy in 2022–23.<sup>8</sup> Pig meat is the second-most consumed meat in Australia after chicken, with Australians consuming an average of 26.6 kilograms of fresh pork and processed products each year.<sup>9</sup>

<sup>5</sup> Agriculture Victoria website, [National Livestock Identification System](#), accessed on 18 December 2023

<sup>6</sup> NLIS (Pigs) [Standard](#), 2022 Edition – Agriculture Victoria

<sup>7</sup> Ibid

<sup>8</sup> Australian Pork Limited website, [Industry facts](#), accessed on 11 December 2023

<sup>9</sup> Australian Bureau of Agriculture and Resource Economics and Sciences, [Meat Consumption: Analysis of Global Meat Consumption Trends](#), 2018

Approximately 90% of Australia's pig meat production is consumed locally.<sup>10</sup> The remaining 10% is exported, generating \$173 million for the national economy.<sup>11</sup> All fresh pig meat consumed in Australia is domestically sourced. Australia also imports approximately 200,000 tonnes of pork products from other countries.<sup>12</sup>

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%).<sup>13</sup>

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:<sup>14</sup>

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

Sole proprietors and companies employing fewer than 20 employees now account for almost 97% of industry enterprises. 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.

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.

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

- Approximately 1.2 million pigs were slaughtered in Victoria.<sup>15,16</sup>  
Approximately 30% of the pigs slaughtered in Victoria are sourced from interstate, including southern New South Wales. These pigs are typically transported to export-registered abattoirs, to enable their export overseas.  
Additionally, approximately 25% of Victorian pigs are 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).

Victoria was Australia's second-largest pig meat exporter, generating 25% (\$31 million) of the nation's pig meat exports,<sup>17</sup> 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).<sup>18</sup>

<sup>10</sup> Australian Pork Limited, [Strategic Plan 2020-2025](#), accessed 18 December 2023

<sup>11</sup> Australian Pork Limited, [Biosecurity Amendment \(Advanced Compliance Measures\) Bill 2023 \[Provisions\] Submission 6](#), accessed 18 December 2023

<sup>12</sup> [APL - Import and Export Report, May 2023](#)

<sup>13</sup> Agriculture Victoria, [Fast Facts January 2023](#), accessed 18 December 2023

<sup>14</sup> Agriculture Victoria analysis based on ABS Census of Population and Housing (2021) and Labour Force Survey (2021-22)

<sup>15</sup> Agriculture Victoria, [Victorian Pig Industry Fast Facts January 2023](#), accessed 18 December 2023

<sup>16</sup> No Victorian knackereries are known to receive and slaughter pigs for processing into pet meat.

<sup>17</sup> This is predominantly from one registered export processing facility, Diamond Valley Pork.

<sup>18</sup> [Victorian Pig Industry Fast Facts – January 2023, Agriculture Victoria](#)



## 2.3 Industry representative bodies

The interests of pig farmers in Victoria are represented through:

- **Victorian Farmers Federation (VFF) Pig Group** – According to the VFF website, the VFF Pig Group represents the majority of the state’s commercial pig farmers (on a membership basis) and ‘provide[s] a means for Victorian pig farmers’ interests and views to be represented on a number of state issues such as planning reforms, Codes and Guidelines, animal welfare and biosecurity’. The VFF Pig Group is also a member of Australian Pork Limited (APL).<sup>19</sup>
- **Australian Pork Limited (APL)** – is a producer-owned services body for Australian pig producers. According to the APL Strategic Plan 2020–2025, APL ‘perform marketing activities to improve the demand for Australian pork, research and development to make the industry more competitive, and representing industry to ensure that government and regulators have all the necessary information for successful policy outcomes readily available’.<sup>20</sup>

The processing sector and small goods producers are represented broadly at the national level by the Australian Meat Industry Council (AMIC). AMIC is the peak body representing retailers, processors and smallgoods manufacturers across Australia.<sup>21</sup>

## 2.4 International context

APL estimates that just under half of all pork products consumed in Australia are derived from imported meat. This figure rises to approximately 80% in the case of ham and bacon<sup>22</sup>. The main source countries are Denmark, Ireland, the Netherlands, Canada and the United States of America (USA).

Table 1 sets out key pig industry facts for these countries. It shows that Australia and Victoria’s pig industry is small compared with these nations. New Zealand is also included, as later chapters of this submission provide an overview of permitted methods of stunning and other arrangements for pig welfare in New Zealand.

	USA	Canada <sup>23</sup>	Netherlands	Denmark	Ireland	New Zealand
Number of pig farms	67,000 <sup>24</sup>	7635	3400	2576	280	93 <sup>25</sup>
Number of pigs	74.3m <sup>26</sup> (09/2023)	14.03 m*	11.4 m	13.21 m	2.0m	632,784 (2022) <sup>27</sup>
Number of pigs slaughtered	128.9m <sup>28</sup>	22 m	16.93m <sup>29</sup> (2022)	18.5 m	3.84 m (2022)	45,256 tonnes <sup>30</sup>
Exports	2.5 m tonnes of pig meat <sup>31</sup> (2022)	6.67 m hogs (worth \$738.1 m)	0.9 tonnes of fresh and frozen pork (2009) <sup>32</sup>	14.2 m live piglets and 436,000 tonnes of live pig meat	294,901 tonnes of pig meat	44,510 tonnes of pig meat

<sup>19</sup> [VFF Pig Group website - 2023](#)

<sup>20</sup> [Australian Pork Limited – Strategic Plan 2020-2025, APL](#)

<sup>21</sup> [AMIC website](#), accessed 4 January 2024

<sup>22</sup> Australian Pork Limited - [Inquiry into Diversifying Australia’s Trade & Investment Profile](#), Submission July 2020

<sup>23</sup> Carlisle Technology, [How Big is the Canadian Pork Industry](#), accessed 18 December 2023

<sup>24</sup> Factory Farming Awareness Coalition, [Pig Farming: Why is it Bad, and Do Pigs Suffer?](#) accessed 18 December 2023

<sup>25</sup> [New Zealand Pork Industry Board Annual Report, 2021](#)

<sup>26</sup> [Quarterly Hogs and Pigs, USDA](#), accessed on 11 December 2023

<sup>27</sup> [New Zealand Pork Industry Board Annual Report, 2022](#)

<sup>28</sup> Statista, [Total number of hogs slaughtered in the U.S. from 2000 to 2022](#), accessed 18 December 2023

<sup>29</sup> Statista, [Animal slaughter in the domestic meat industry in the Netherlands in 2022](#), accessed 18 December 2023

<sup>30</sup> [New Zealand Pork Industry Board Annual Report, 2022](#)

<sup>31</sup> Pork Checkoff, [U.S. Pork Exports](#), accessed 18 December 2023

<sup>32</sup> Feed Navigator, [The Netherlands sees Record Pork Exports](#), accessed 18 December 2023

	USA	Canada <sup>23</sup>	Netherlands	Denmark	Ireland	New Zealand
		1.44 m tons of pork (worth \$4.96 billion)				consumed in NZ (2020) <sup>33</sup>

**Table 1. International pig industry data.**<sup>20</sup> All figures are for 2021 unless specified. \*million

### 3. Regulation of Victoria's pig industry

Every person who owns, or is in charge of, a pig or pigs is required to comply with the POCTA Act and associated regulations as well as any regulated standards. This includes commercial farms, hobby or lifestyle farms, people who own, or are in charge of, pet pigs and pigs kept for other purposes (for example, pigs that are used in mobile petting zoos or in exhibitions). There are also mandatory codes of practice that may apply to pigs and provide guidance on pig welfare and acceptable practices.

RSPCA Victoria is responsible for responding to animal welfare and cruelty complaints involving less than 10 pigs. Agriculture Victoria, DEECA responds to complaints for 10 or more pigs, which includes all commercial farms.

This section focuses on Victoria's commercial pig industries and sets out regulatory requirements and responsibilities as they apply along the commercial pig industry supply chain.

Animal welfare in Victoria's pig industry is regulated by a framework of legislation and mandatory standards that apply at 4 different stages of the supply chain, from pre-production to slaughter and processing (**Error! Reference source not found.**).



**Figure 1: A simplified commercial pig supply chain, as relevant to animal welfare.**

#### Regulatory framework

The regulatory framework (illustrated in Figure 2) that applies to the welfare of all pigs comprises:

- The *Prevention of Cruelty to Animals Act 1986* (POCTA Act) and associated regulations (Vic)  
The POCTA Act and regulations set out to prevent cruelty to animals; encourage considerate treatment of animals and improve level of community awareness about the prevention of cruelty to animals.
- *Livestock Management Act 2010* (Livestock Management Act), regulations and prescribed livestock management standards (Vic), including:
  - Victorian Standards and Guidelines for the Welfare of Pigs (Vic) (Pig Welfare Standards)<sup>34</sup>
  - Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (national, adopted in Vic) (Land Transport S&G)

The Livestock Management Act regulates livestock management in Victoria and describes farming practices that are permissible, based on agreed and scientifically defensible standards. It also has scope to recognise biosecurity and traceability standards along with industry quality assurance programs. The Livestock Management Act provides assurance to customers and the community

<sup>33</sup> [New Zealand Pork Industry Board Annual Report, 2020](#)

<sup>34</sup> The national *Model Code of Practice for the Welfare of Animals: Pigs* has been adopted in Victoria as the Pig Welfare Standards

regarding livestock management practices and assists in maintaining productivity and market access for livestock businesses<sup>35</sup>.

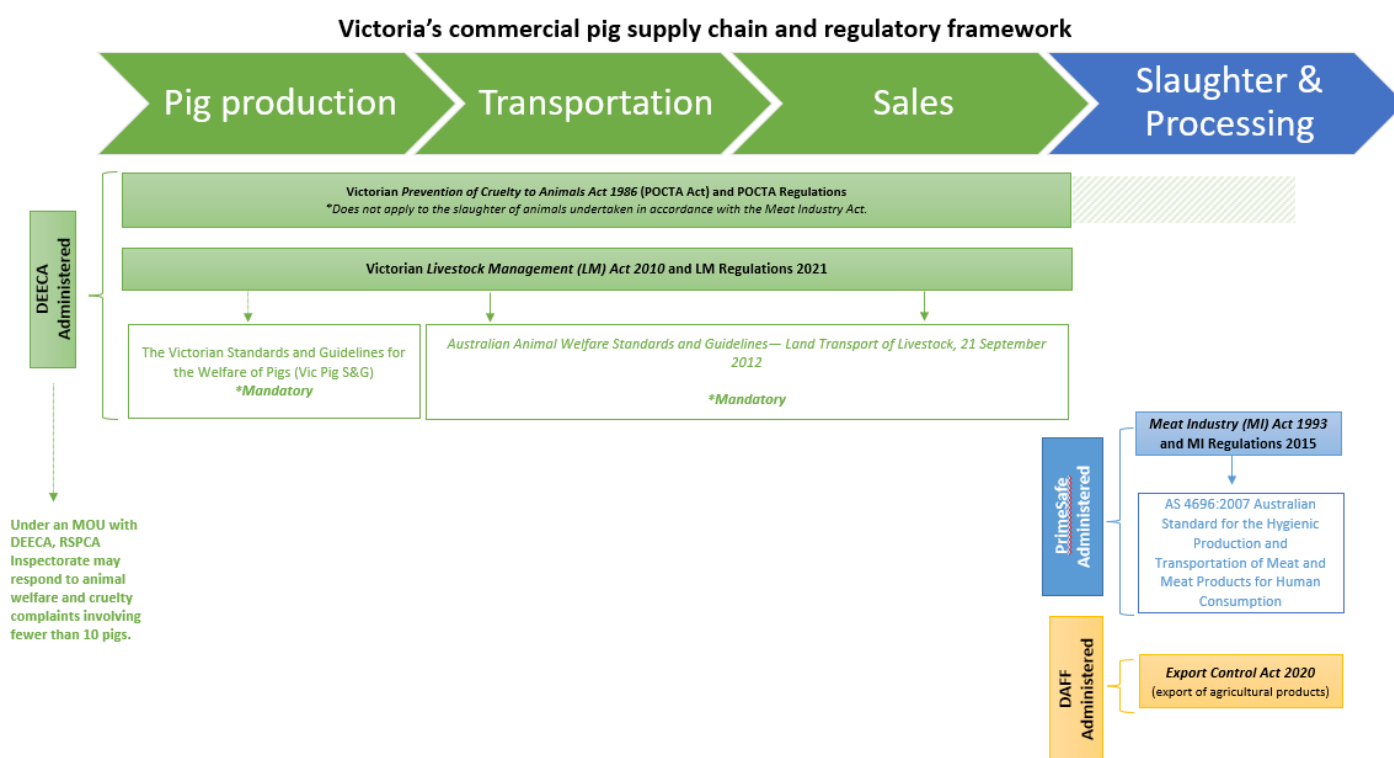
- *Meat Industry Act 1993* (Meat Industry Act) and regulations (Vic)

The Meat Industry Act is a food safety act and was established to: set standards for meat production for human consumption and pet food; set up a licensing and inspection system and a mechanism for adopting and implementing quality assurance programs to ensure that those standards are maintained; and enable the regulation of meat transport vehicles.<sup>36</sup>

The Meat Industry Act does not include any provisions relating to animal welfare, however under PrimeSafe licence conditions abattoirs must comply with the Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS4696:2007). Part 3, Chapter 7 of this standard relates to Animal Welfare and addresses the handling of stock, management of sick and injured stock, slaughtering practices and ritual slaughter<sup>37</sup>. AS4696:2007 is discussed in more detail below.

- Commonwealth *Export Control Act 2020* (Export Control Act) and the Export Control (Meat and Meat Products) Rules 2021 (the Rules).

The Export Control Act sets out the legal framework for the regulation of goods exported from Australia, including food and agriculture products<sup>38</sup>. The Rules, made under the Export Control Act, set out the operational requirements that must be met to export meat and meat products from Australia<sup>39</sup>. These laws 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.<sup>40</sup>



**Figure 2: Regulatory framework, Victorian pig industry.**

<sup>35</sup> Agriculture Victoria website, *About the Livestock Management Act*, accessed 21 December 2023

<sup>36</sup> *Meat Industry Act 1993, Part 1*

<sup>37</sup> Australian standard for the hygienic production and transportation of meat and meat products for human consumption, FRSC Technical Report No. 3 AS 4696:2007

<sup>38</sup> Outline of the Export Control Act, Department of Agriculture, Water and the Environment, March 2021

<sup>39</sup> Outline of the Export Control (Meat and Meat Products) Rules 2021, Department of Agriculture Water and the Environment, March 2021

<sup>40</sup> Department of Agriculture, Fisheries and Forestry website, *Improved agricultural export legislation*, accessed on 21 December 2023

## Regulatory bodies

The regulatory bodies that oversee the welfare of pigs in Victoria are:

### Agriculture Victoria, DEECA

- Agriculture Victoria, DEECA administers and enforces the POCTA Act and its supporting regulations as well as the POCTA Codes of Practice:
- Animal welfare and cruelty complaints involving 10 or more pigs are the responsibility of Agriculture Victoria. RSPCA Victoria has a role in compliance and enforcement activities under the POCTA Act and responds to animal welfare and cruelty complaints involving less than 10 pigs.
- Agriculture Victoria administers and enforces the Livestock Management Act, its supporting regulations and prescribed Livestock Management Standards.
- The Pig Welfare Standards and Land Transport S&G are mandatory codes adopted under the Livestock Management Act.
- Agriculture Victoria administers the Meat Industry Act and its supporting regulations.

### PrimeSafe

- PrimeSafe is responsible for compliance and enforcement activities under the *Meat Industry Act 1993* and regulations made under that Act. The Act provides for a licensing system for abattoirs and facilities where animals may be slaughtered.
- By conditions imposed on licences, licensees must comply with the Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS4696:2007).
- PrimeSafe monitors compliance with the Meat Industry Act and animal welfare requirements in AS4696:2007 at meat processing facilities that handle live animals, via multiple audits and inspections each year. PrimeSafe also respond to complaints relating to their licensees. Section 3.3 provides further information about auditing and enforcement activities.

### Australian Government Department of Agriculture, Fisheries and Forestry (DAFF)

- DAFF administers the Export Control Act 2020 (Export Control Act) and the Export (Meat and Meat Products Rules 2021) (the Rules), which set out the legal framework for regulating food and agriculture products exported from Australia.
- All export abattoirs and processing facilities in Victoria must comply with these export laws (including animal welfare standard operating procedures) and the Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS4696).
- Processing facilities in Victoria that export are regulated by both PrimeSafe and DAFF. By arrangement with DAFF, and for the purpose of minimising duplication, DAFF undertakes inspections and monitors compliance of all facilities that are licensed to export meat.

## 3.1 Pig production, transportation and sales

Figure 3 shows Agriculture Victoria's role in regulating pig welfare across pig production, transportation and sale supply chain stages.

The regulatory framework for pig production, transportation and sales in Victoria comprises:

- The POCTA Act and regulations
- POCTA advisory Codes of Practice
- Livestock Management Act
- Pig Welfare Standards
- Land Transport S&G.

There is only one POCTA advisory code of practice that has relevance to the pig industry. The Code of Practice for the Welfare of Animals at Saleyards provides a guidance on the management of animals at saleyards. Due to the operation of the industry, pigs are not commonly sold through saleyards in Victoria.



**Figure 3: Agriculture Victoria's regulatory role in pig production, transportation, sales and slaughter/processing.**

## The POCTA Act and regulations

The POCTA Act is Victoria's principal animal welfare act. The POCTA Act includes cruelty and aggravated cruelty offences. Act of cruelty includes any act or omission that causes unreasonable pain or suffering to an animal or where there has been a failure to provide proper and sufficient food, water, shelter, attention or veterinary treatment to an animal.

Cruelty also covers behaviours like wounding, torturing, overworking, overcrowding, beating, crowding or confining, abandoning or poisoning an animal.<sup>41</sup> Aggravated cruelty offences include an act or acts of cruelty on an animal that result in their death or serious disablement.<sup>42</sup>

The POCTA Act applies to all pigs, whether they are kept as domestic pets, used for primary production or for other purposes such as exhibitions.

The POCTA Regulations 2019 include requirements relating to transport as well as the use of electronic equipment such as electronic stunning devices, electronic ejaculators and electric prodders.<sup>43</sup>

In the commercial pig meat industry supply chain, the POCTA Act and its regulations apply across the supply chain from pig production, transportation and sales to aspects of processing, such as lairage.

The POCTA Act includes a non-application provision<sup>44</sup>, which means the Act does not apply to slaughter if it is done in accordance with the Meat Industry Act or any Commonwealth Act. The POCTA Act also does not apply to the slaughter of a farm animal on a farm, if done in accordance with specified requirements including slaughter in a humane manner.<sup>45</sup>

However, if slaughter is undertaken in a manner that contravenes the Meat Industry Act or any Commonwealth Act, the cruelty offences of the POCTA Act may apply.

More information on the POCTA Act is provided in [Appendix A](#).

<sup>41</sup> Prevention of Cruelty to Animals Act 1986 s 9(1)

<sup>42</sup> Prevention of Cruelty to Animals Act 1986 s 10(1)

<sup>43</sup> POCTA Regulations 2019, Sec 6, 7, 18, 19, 20

<sup>44</sup> Prevention of Cruelty to Animals Act 1986 s 6(1)(a)

<sup>45</sup> Prevention of Cruelty to Animals Act 1986 s 6(1)(f)

## Reform of the POCTA legislation

Work is underway to replace the POCTA Act, POCTA Regulations and the POCTA Codes of Practice with a new Animal Care and Protection Act and supporting regulations.

The draft Animal Care and Protection Bill (draft Bill) was released for public comment on [engage.vic.gov.au](https://engage.vic.gov.au) in December 2023. Consultation is open until March 2023. Feedback received will inform the finalisation of the draft Bill.

The draft Bill does not specifically reference the *Meat Industry Act 1993* or any Commonwealth Act.

The draft Bill will allow for any requirements set by the new Australian Animal Welfare Standards and Guidelines for Livestock at Processing Establishments, to be incorporated into regulations supporting the new Act in Victoria. Any activity involving killing or wounding an animal (including slaughter) could be regulated within the provisions of the new laws, under the **specified conduct** framework (Part 5 of the draft Bill).

If passed by the Parliament, the new Animal Care and Protection Act would provide for a principles-based legislative framework. The Act would set out high-level care requirements and offences and cruelty offences, with supporting regulations providing more detailed requirements for different species and activities involving animals, with attached offences and penalties.

The regulations would set out requirements and related offences for the care and protection of animals kept in intensive environments, as well as activities such as husbandry procedures, the transport of animals, and the slaughter of production animals.

The current POCTA Regulations, the POCTA Codes of Practice as well as endorsed Australian Animal Welfare Standards and Guidelines would provide the basis for the new regulations.

## Australian Animal Welfare Standards and Guidelines

All Australian jurisdictions have agreed to work together to develop and implement nationally consistent standards and guidelines for farm animal welfare. Australian Animal Welfare Standards and Guidelines (S&G) update and replace existing Model Codes of Practice for the Welfare of Animals for major livestock industries. The standards are designed to be implemented in state and territory legislation and are accompanied by voluntary guidelines that set out recommended practice for the care and husbandry of animals.

The Victorian Government is a member of the national Animal Welfare Task Group (AWTG), which oversees the development and review of S&G, and actively participates in the development process. Participation in this work supports improved animal welfare practices and sustainable Victorian livestock industries. Information on current S&G projects is available on the [AWTG webpage](#).

The S&G development process includes an extensive stakeholder and public consultative process and a Regulation Impact Analysis. Once developed, it is up to each state and territory government to implement the standards, as appropriate for their jurisdiction.

It is intended that all endorsed S&G will be adopted into regulations under the proposed new Animal Care and Protection Act. This will ensure that all welfare requirements are regulated under a single Act, regulatory burden is reduced by having a single point of reference for welfare standards and will support a consistent enforcement approach.

## Livestock Management Act

Victoria's [Livestock Management Act 2010](#) provides a framework to administer nationally-consistent animal welfare, biosecurity and traceability standards. It provides assurance to customers and the community about livestock management practices and assists in maintaining productivity and market access for livestock businesses.

## Pig Welfare Standards

The Australian Model Code of Practice for the Welfare of Animals – Pigs (3rd edition) has been adopted in Victoria as the Pig Welfare Standards, these are prescribed under section 6 of the Livestock Management Act as a mandatory livestock management standard.<sup>46</sup> The Pig Welfare Standards recognise that the basic requirement for the welfare of pigs is a good husbandry system, managed by trained and skilled stock-people and cover food and water, accommodation, husbandry and methods for humane destruction.

The Pig Welfare Standards set out specific requirements for pigs:

- Readily accessible, appropriate and sufficient food and water.
- Adequate shelter to protect from climatic extremes.
- Opportunity to display appropriate patterns of behaviour.
- Physical handling that minimises likelihood of unreasonable or unnecessary pain or distress.
- Protection from and/or rapid diagnosis and correct treatment of injury or disease.
- Freedom for necessary movement including to stand, stretch and lie down.
- Visual and social contact with other pigs.<sup>47</sup>

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.

## The Australian Animal Welfare Standards and Guidelines for Land Transport of Livestock (Land Transport S&G)

The Land Transport S&G have been adopted into Victorian legislation under section 6 of the Livestock Management Act.<sup>48</sup>

The Land Transport S&G cover requirements for the transport of livestock by road, rail and by livestock transport vehicle aboard a ship under limited conditions and cover facilities, pre-transport livestock selection, livestock loading, transporting and unloading and humane destruction. The Land Transport Standards includes additional species-specific welfare considerations during transport including pigs.<sup>49</sup> Compliance with a prescribed livestock management standard, including the Land Transport S&G under the Livestock Management Act provides a defence to an offence under the POCTA Act.<sup>50</sup>

The Land Transport S&G and Pig Welfare Standards will be transitioned from the LMA and into regulations under the proposed new Animal Care and Protection Act.

## 3.2 Slaughter and processing

PrimeSafe regulates the slaughter and processing components of Victoria's pig industry supply chain. When pig meat is processed for the export market, DAFF also has a role.

Figure 4 shows PrimeSafe's role in regulating pig welfare during slaughter and processing.

The regulatory framework for the slaughter and processing of pigs in Victoria comprises:

- Meat Industry Act
- Licences provided for under that Act

<sup>46</sup> *Livestock Management Act 2010* s 6

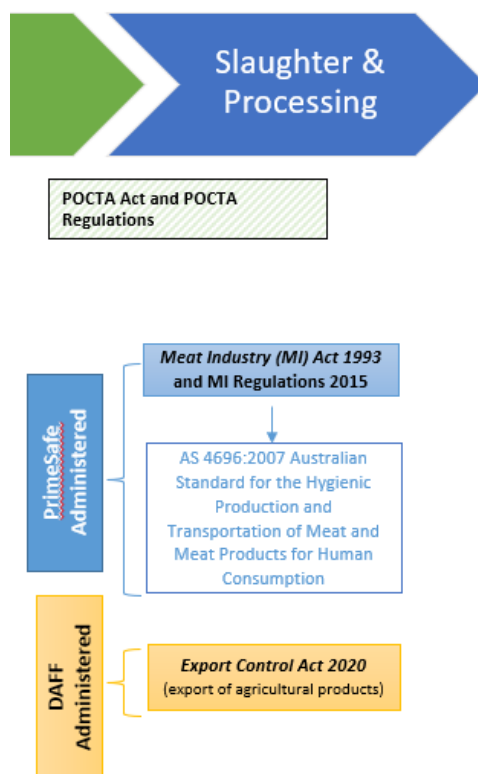
<sup>47</sup> Victorian Standards and Guidelines for the Welfare of Pigs 2012, pp 1

<sup>48</sup> *Livestock Management Act 2010* s 6

<sup>49</sup> Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock 2012, pp 89

<sup>50</sup> *Livestock Management Act 2010* s 4(3)

- Australian Standard (AS) AS4696:2007<sup>51</sup>
- *Export Control Act 2020* (Cth) (for export businesses)



**Figure 4: PrimeSafe regulatory role in pig slaughtering and processing.**

## Meat Industry Act

Victoria's [Meat Industry Act 1993](#) establishes a licensing and inspection system, and mechanism for adopting and implementing quality assurance programs to ensure that appropriate food safety standards are maintained. The Act also enables the regulation of meat transport vehicles.

The Meat Industry Act permits small scale and lifestyle pig producers to slaughter pigs on-farm for home consumption.

## Meat Industry Act, licences and AS4696:2007

Licences to operate a meat processing facility are administered by PrimeSafe under Victoria's Meat Industry Act (section 13(1)). This includes abattoirs, knackerries and facilities where animals may be slaughtered. More information on the Meat Industry Act is provided in [Appendix A](#).

The primary means by which PrimeSafe imposes standards relating to the conduct of meat processing facilities is through the licence conditions requiring compliance with relevant Australian Standards. A licensee who does not comply with a relevant Australian Standard commits an offence under section 41 of the Meat Industry Act. For example, it is a condition of all licences authorising the holder to operate an abattoir that the

<sup>51</sup> a new Australian Meat Standard (AS 4696:2023) has been introduced for export registered meat establishments, following amendment of the definition for the Australian Meat Standard in the Export Control (Meat and Meat Products) Rules 2021. This new standard will be introduced in Victoria when current licences expire.



licensee comply with the *Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption AS4696:2007* (AS4696).<sup>52</sup>

PrimeSafe monitors compliance at meat processing facilities handling live animals via audits and inspections. This includes an ongoing Animal Welfare Surveillance Program where meat processing facilities are subject to two (2) unannounced animal welfare inspections each year. Inspections involve an assessment of the restraint, stunning and sticking equipment and review of procedures under quality assurance programs.

Cruelty offences under the POCTA Act may apply where slaughter is not carried out in accordance with the requirements of the Meat Industry Act or where the animal at the facility is not in the process of being slaughtered.

Agriculture Victoria and PrimeSafe have an agreement on collaboration for animal welfare investigations. It sets out their shared commitment to a cooperative approach in responding to animal welfare complaints and reports from the public relating to meat processing facilities.

PrimeSafe may require meat processing facilities to operate in accordance with an approved quality assurance program, with regular compliance monitoring.<sup>53</sup> The Meat Industry Act allows PrimeSafe to approve a third-party to provide inspection services for the animals and meat at licensed meat processing facilities.<sup>54</sup> Third-party auditors are subject to regular monitoring of performance, capability, constancy and review of complaints by PrimeSafe<sup>55</sup>.

## Export Control Act 2020

The Australian Department of Agriculture, Fisheries and Forestry (DAFF) has responsibility under the Export Control Act and subordinate legislation for regulating businesses who export pig meat products.

Export abattoirs in Victoria must comply with their approved arrangement (including animal welfare standard operating procedures) under these laws and the Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS4696).

Further detail of how DAFF manages the animal welfare requirements of animal arrival, handling and slaughtering at export-registered abattoirs is provided in the DAFF Export Meat Operational Guideline (*1.1 Animal welfare – from arrival to completion of slaughter*).<sup>56</sup>

As outlined above, processing facilities in Victoria that export pig meat are regulated by both PrimeSafe and DAFF. By arrangement between DAFF and PrimeSafe, DAFF undertakes inspections and monitors compliance of all facilities that are licensed to export meat.

## Australian Animal Welfare Standards and Guidelines for Livestock at Processing Establishments

The AWTG 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

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<sup>52</sup> On 1 July 2023, the *Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption 2023* was implemented to replace the AS4696:2007 in export registered meat establishments. However, the AS4696:2007 will continue to apply as part of license condition in Victoria until the current licenses expire in 2024. The Australian *Model Code of Practice for the Welfare of Animals – Livestock at Slaughtering Establishments 2002* is not a feature of PrimeSafe licensing but is used as a common reference point.

<sup>53</sup> *Meat Industry Act 1993* ss 10, 12

<sup>54</sup> *Meat Industry Act 1993* s 7(1)

<sup>55</sup> PrimeSafe Annual Report 2022-23

<sup>56</sup> [Export Meat Operational Guideline 1.1 Animal welfare - from arrival to completion of slaughter \(agriculture.gov.au\)](#), March 2023

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.

### 3.3 Compliance, enforcement and prosecutions

#### Agriculture Victoria

Agriculture Victoria is responsible for investigating animal welfare complaints that involve 10 or more pigs. All complaints received by Agriculture Victoria are assessed, triaged and investigated in accordance with departmental procedures. Investigations include activities such as visiting properties, assessing/inspecting livestock, and speaking with owners, persons in charge and witnesses. Complaints involving less than 10 pigs are referred to RSPCA Victoria to complete the investigation.

If a breach of animal welfare legislation is confirmed, a case is considered to be substantiated and compliance tools and regulatory outcomes may be applied. Not all animal welfare complaints are resolved with a regulatory outcome. An Inspector may determine that no contravention of law has occurred, that there is insufficient evidence to determine whether an offence has occurred; and/or the complaint may be substantiated but due to other factors the Inspector may use their discretion to determine that it is inappropriate to issue a regulatory outcome.

Under DEECA's Compliance Policy, the use of compliance tools and regulatory outcomes should be proportionate to the level of risk of harm and to case specific circumstances. The regulatory outcome applied depends on several considerations, including seriousness of offending, risk and harm, prior history, potential for continued offending and other case specific factors. Inspectors can apply discretion in determining the regulatory outcome, considering risk and potential harm. Education about relevant laws and regulation can be a regulatory outcome.

Inspectors' decision making is guided and supported by Enforcement Guidelines. In the majority of cases, early intervention and other prevention methods mitigate the animal welfare issue, making lower-level regulatory outcomes effective to achieve voluntary compliance. Prevention of cruelty occurring or the likelihood of cruelty occurring is the ultimate aim.

Currently, under the POCTAA regulatory tools available to Inspectors are:

**Advisory letter** - low level action, a letter to a person likely to contravene the law, with the aim of reminding them of their obligations under the Act, Regulations and/or Code of Practice or Standards. Advisory letters are utilised for conduct that is compliant with legislation but of poor standard. Relevant educational/extension material is included with the letter.

**Warning letter** - mid-level action for non-infringeable offence (such as section 9 or 10 of the POCTA Act), a letter to a person alleged to have contravened the law with the aim of reminding them of their obligations under the Act and/or Regulations. Relevant educational/extension material is included with the letter.

**Notice to comply** - requires the owner or person in charge to take action as instructed by the Inspector. It is an offence not to comply with the Notice to Comply.

**Seizure (including Notices of Intent to seize):** seize the animals if an Inspector believes that the animals are currently or in immediate danger of suffering harm and there are grounds under the POCTA Act. This can be done in tandem with other regulatory outcomes.

**Infringement notices** – only available for a limited number of offences, such as (in the case of pigs) inappropriate use of certain electronic devices and transporting of animals including time off water, unfit to load or putting an animal in the boot of vehicle.

**Official warning** – available under the Infringements Act as an alternative to an infringement notice for an infringeable offence, an official warning for an infringeable offence is the equivalent of a warning letter for a non-infringeable offence.

**Prosecution** - high level action, taken when the offending is of high risk/harm to an animal/s and warrants prosecution consistent with prosecutorial discretion and policy.

During 2018 – 2023, Agriculture Victoria received 179 animal welfare complaints involving pigs, 23% were substantiated. Most pig welfare complaints were received directly from members of the public (31%) or referred from RSPCA (38%), local government (12%) or vets at export registered abattoirs (11%). Most

substantiated cases referred to alleged incidents occurring on farms (83%) or at abattoirs/processing plants (15%). Considering all complaints that involved pigs, failure to provide sufficient feed, drink or shelter was the most common allegation (57%), followed by failure to provide treatment for sick and injured animals (34%) and causing unreasonable pain and suffering by an act or omission (37%).

Investigations into substantiated cases resulted in 17 notices to comply, 32 advisory letters and 6 warning letters (refer to [6.3 Appendix B](#) for a more detailed breakdown of these complaints). Over the same period, Agriculture Victoria received 8432 animal welfare complaints in total, of which 3102 (37%) were substantiated.

One case, involving 80 pigs, was prosecuted. The accused pleaded guilty to cruelty and aggravated cruelty charges relating to failure to provide feed, water and veterinary treatment, including for a broken leg. A fine of \$3000 was imposed without conviction and the defendant was disqualified from owning or being in charge of pigs for 2 years.

Data on reports relating to fewer than 10 pigs is not included in this submission as those reports are investigated by RSPCA Victoria.

## PrimeSafe

PrimeSafe investigates matters relating to:

- Compliance of licensees with the Act, the regulations, Codes of Practice, quality assurance programs and conditions of the licences issued by PrimeSafe
- Alleged food safety or animal welfare issues or alleged non-compliance with the applicable standards at a licensed meat processing facility or with respect to a meat transport vehicle
- The operation of unlicensed meat processing facilities or meat transport vehicles
- PrimeSafe's service delivery
- The performance of accredited third-party auditing bodies or individual auditors.

PrimeSafe does not investigate complaints relating to:

- Customer service grievances
- Product that is fit for consumption but considered to be of poor quality
- Trade practices that fall outside the scope of PrimeSafe's statutory remit.

Between 2018 and 2023, animal welfare complaints were a small percentage of total complaints (2.8% of total complaints). On average, 10.2 animal welfare complaints are received each year, with an average of 2.8 of these complaints being substantiated. It is important to note that the number of complaints related to animal welfare is not specific to pigs. More information on animal welfare enquiries, audits and surveillance by PrimeSafe is provided under [Appendix C](#).

## Recent pig welfare investigations conducted by PrimeSafe.

In late March 2023, the Australian Broadcasting Corporation published video footage purportedly depicting gas stunning at 3 Victorian pig processing abattoirs. After the story airing, PrimeSafe received written complaints alleging mistreatment of pigs at 2 meat processing facilities. The complaints were accompanied by additional video footage. PrimeSafe commenced an investigation into these matters to determine whether any person had failed to comply with a condition of a PrimeSafe licence. PrimeSafe has now concluded its investigations and:

- on 4 August 2023, varied the licence of one operator to make provision for improved monitoring of stunning and animal handling; and
- on 31 October 2023, charged another entity with contraventions of the *Meat Industry Act 1993* by breaching conditions on its licence. That matter is now before the courts.

## 4. Stunning of pigs before slaughter

The process of stunning induces unconsciousness to avoid exposing animals to pain associated with the slaughter process.

Several Australian Standards make provision for animal welfare. For example, the Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption AS4696 requires that:

Animals are handled at meat premises in a way that minimises the risk of injury, pain and suffering and causes the least practicable disturbance to them and to other animals at the premises.<sup>57</sup>

Before sticking commences, animals are stunned in a way that ensures the animals are unconscious and insensible to pain and do not regain consciousness or sensibility before dying.<sup>58</sup>

There are 3 types of stunning methods permitted in the Australian and international pig industries:<sup>59</sup>

- **Mechanical** – this involves applying a physical blow to the head of an animal to render it unconscious. Mechanical stunning methods may use a penetrating or non-penetrating captive bolt.
- **Electrical** – electrical stunning is achieved via passage of electric current through the brain that leads to an epileptic seizure causing loss of consciousness. The 2 methods used in commercial abattoirs include electrical head only stunning and electrical head to body stunning.
- **Gas (controlled atmosphere)** – controlled atmosphere stunning involves exposing the animals to carbon-dioxide (CO<sub>2</sub> – an odorless gas) or a mixture of CO<sub>2</sub> and an inert gas such as argon or nitrogen. This causes the pH of the cerebrospinal fluid to fall inducing brain activity depression that leads to loss of consciousness.<sup>60</sup> CO<sub>2</sub> gas stunning enables abattoirs to handle and stun small groups of pigs. Individual handling and restraint are required for electrical or captive bolt stunning.

Table 2 below outlines advantages and disadvantages of each.

Stunning method	Optimal welfare outcomes	Advantage	Disadvantage
Mechanical <sup>61</sup> (Penetrating and non-penetrating captive bolt)	Method causes immediate loss of consciousness without animal regaining consciousness  Depends upon type of device and match of equipment to size and age of the animal to achieve optimal outcome.	Immediate loss of consciousness prior to slaughter occurring (must be immediately followed by bleeding out).  Commercially available and cost per pig is fairly inexpensive.	Animals need to be individually handled and restrained which can be stressful.  Effectiveness can be impacted by the age of the animal, thickness of skull, accuracy of method, skill of person and areas of brain that are damaged.  Not ideal for large numbers of animals as very labour intensive.  Method can be unpleasant for stock people to perform.

<sup>57</sup> AS4696:2023 Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption 2007, Chapter 7 (7.2)

<sup>58</sup> AS4696:2023 Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption 2007, Chapter 7 (7.10)

<sup>59</sup> Australian Pork Limited 2018, Review of the scientific literature and the international pig welfare codes and standards to underpin the future Standards and Guidelines for Pigs, pp 89 – 97.

<sup>60</sup> Queensland Department of Agriculture and Fisheries 2022, An independent scientific review of processing establishment practices for livestock welfare, pp 25 – 28

<sup>61</sup> Queensland Department of Agriculture and Fisheries 2022, An independent scientific review of processing establishment practices for livestock welfare, pp 60

Stunning method	Optimal welfare outcomes	Advantage	Disadvantage
Electrical <sup>62</sup>	Method causes immediate loss of consciousness without animal regaining consciousness	Immediate loss of consciousness prior to slaughter (must be immediately followed by bleeding out).	Animals need to be individually handled and restrained which can be stressful. Requires equipment that ensures electrodes are appropriate fit for size of the animal. Regular maintenance and calibration to ensure correct electrical parameters are being used.
Gas (controlled atmosphere) <sup>63</sup>	Following exposure to gas, unconsciousness should occur rapidly for all pigs stunned in a group with animals not regaining consciousness. Carbon dioxide's effectiveness and aversive impacts are dependent on concentration levels and exposure times and may differ depending on pigs age and stress levels.	Pigs can be handled and stunned in small groups rather than separated and restrained individually which has been shown to result in lower stress and improved movement through the system.	The onset of unconsciousness is not immediate and there is a period of time during which animals perform behavioural responses indicative of aversion and distress. If animals are not killed by the gas, there is a risk of return to consciousness if bleeding is not performed promptly and accurately.

**Table 2. Advantages and disadvantages of different stunning methods**

A total of 1,202,060 pigs were slaughtered in Victoria in abattoirs in the 2022-23 licence year<sup>64</sup>. Approximately 93% of these pigs were subject to gas stunning.

## 4.1 Current stunning methods in Australia and Victoria

### Australia

While 75 abattoirs process pigs in Australia, APL estimates that around 85% of pigs are processed at 7 export-registered abattoirs. These 7 abattoirs are licensed to process pigs for domestic markets as well as for export to international markets and use CO<sub>2</sub> stunning methods.<sup>65</sup> The remaining 15% of pigs in Australia are slaughtered and processed at smaller abattoirs that process pigs for domestic markets only.<sup>66</sup>

### Victoria

Victoria has 6 abattoirs that slaughter and process pigs. 3 use electrical stunning methods, 2 use CO<sub>2</sub> 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.

<sup>62</sup> Queensland Department of Agriculture and Fisheries 2022, An independent scientific review of processing establishment practices for livestock welfare, pp 59

<sup>63</sup> Queensland Department of Agriculture and Fisheries 2022, An independent scientific review of processing establishment practices for livestock welfare, pp 58 - 59

<sup>64</sup> [APL Market Reports](#), accessed on 5 January 2024

<sup>65</sup> Australian Pork Limited website, [About pig farming: stages of pork production](#), accessed on 28-11-2023

<sup>66</sup> Ibid.

## Review of stunning methods in Australia

A review of stunning methods is being completed as part of the process to develop new national Processing S&G. Extensive consultation with stakeholders and a public consultation process has begun and will continue as part of this process. The progress for developing new standards, including an independent scientific literature review, is updated on the [Animal Welfare Task Group website](#). Once the national Processing S&G have been completed, they can be adopted in the Victorian animal welfare regulatory framework.

### 4.2 International comparison of permitted stunning methods

Aside from fresh pork products, most pig meat products consumed in Victoria are imported from North America and European countries which use CO<sub>2</sub> as the main method to stun pigs for slaughter.

Table 3 sets out the requirements for pig stunning in Australia (Victoria), Canada, the United Kingdom (UK), European Union (EU), New Zealand and the United States of America (USA). The table shows that permitted stunning methods in Victoria are broadly consistent with, and in the case of mechanical stunning more stringent than, methods used overseas.

Method / Jurisdiction	Australia	Canada	UK	EU	New Zealand	USA
Gas	Stunning pigs by exposure to mixtures of air and CO <sub>2</sub> are also acceptable. <sup>67</sup>	Exposure to a gas or a gas mixture in a manner that causes rapid loss of consciousness. <sup>68</sup>	Pigs may be killed at a slaughterhouse by exposure to CO <sub>2</sub> gas mixture in a chamber. A CO <sub>2</sub> gas mixture shall mean at least 70% CO <sub>2</sub> by volume in atmospheric air. <sup>69</sup>	Permits carbon dioxide gas at high concentration CO <sub>2</sub> mixture associated with inert gases, inert gas mixture such as Argon or Nitrogen. <sup>70</sup>	Not included as a permitted stunning method <sup>71</sup> .	Permits slaughter of swine with the use of CO <sub>2</sub> gas. <sup>72</sup>
Mechanical	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	Delivering blow to the head with a mechanical device in a manner that causes an immediate loss of consciousness. <sup>74</sup>	Permits any animal to be stunned by captive bolt or concussion. <sup>75</sup>	Permits penetrative captive bolt, percussive blow to the head (piglets up to 5 kg), firearm with free projectile. <sup>76</sup>	Permits captive bolt and free-bullet firearm. <sup>77</sup>	Permits slaughter of swine by using captive bolt stunners and by shooting with firearm. <sup>78</sup>

<sup>67</sup> Australian Model Code of Practice for the Welfare of Animals – [Livestock at Slaughtering Establishments SCARM Report 79 2002, 2.6.2.10](#)

<sup>68</sup> Canada Safe Food Regulations SOR/2018-108, Part 6, SubDivision F, Sec 141(c)

<sup>69</sup> UK The Welfare of Animals (Slaughter or Killing) Regulations 1995 No.731, Schedule 7, Part II, Paragraph 3

<sup>70</sup> EU Council Directive 1009/2009 of 24 September 2009, Annexure 1, Chapter 1, Table 3

<sup>71</sup> NZ Code of Welfare: Commercial Slaughter 2018, Minimum Standard No. 6

<sup>72</sup> US Code of Federal Regulations – Animal and Animal Products, Sec 313.5

<sup>74</sup> Canada Safe Food Regulations SOR/2018-108, Part 6, SubDivision F, Sec 141(a)

<sup>75</sup> UK The Welfare of Animals (Slaughter or Killing) Regulations 1995 No.731, Schedule 5, Part II, Paragraph 4

<sup>76</sup> EU Council Directive 1009/2009 of 24 September 2009, Annexure 1, Chapter 1, Table 1

<sup>77</sup> NZ Code of Welfare: Commercial Slaughter 2018, Schedule II

<sup>78</sup> US Code of Federal Regulations – Animal and Animal Products, Sec 313.15, 313.16

Method / Jurisdiction	Australia	Canada	UK	EU	New Zealand	USA
	the stunning or large sows or boars with a penetrating captive-bolt. <sup>73</sup>					
Electrical	Pigs should be electrically stunned, and head-to-back stunning to induce cardiac arrest is strong recommended (400 volts, 1.3 amps for 2 seconds). <sup>79</sup>	Applying an electrical current in a manner that causes an immediate loss of consciousness. <sup>80</sup>	Permits use of electrodes to stun any animal. <sup>81</sup>	Permits head-only electrical stunning, head-to-body electrical stunning. <sup>82</sup>	Permits head-only electrical stun, head-to-body electrical stun. <sup>83</sup>	Permits slaughter of swine with the use of electric current. <sup>84</sup>

**Table 3. Permitted stunning methods in Australia and overseas**

<sup>73</sup> Australian Model Code of Practice for the Welfare of Animals – Livestock at Slaughtering Establishments SCARM Report 79 2002, 2.6.2.9

<sup>79</sup> Australian Model Code of Practice for the Welfare of Animals – Livestock at Slaughtering Establishments SCARM Report 79 2002, 2.6.2.8

<sup>80</sup> Canada Safe Food Regulations SOR/2018-108, Part 6, SubDivision F, Sec 141(b)

<sup>81</sup> UK The Welfare of Animals (Slaughter or Killing) Regulations 1995 No.731, Schedule 5, Part II, Paragraph 4

<sup>82</sup> EU Council Directive 1009/2009 of 24 September 2009, Annexure 1, Chapter 1, Table 2.

<sup>83</sup> NZ Code of Welfare: Commercial Slaughter 2018, Schedule III

<sup>84</sup> US Code of Federal Regulations – Animal and Animal Products, Sec 313.30

## 5. Breeding and housing practices

Australian Pork Limited (APL) recognises, and certifies, 3 pig housing systems operating in Australia:<sup>85</sup>

**Indoor system farming** – pigs are kept inside for their entire life. An indoor system farming facility uses different sheds to support different life-stages of pigs (mating and pregnancy, birth to weaning, weaners, grower, finisher). These sheds tend to use passive end-to-end ventilation systems, with some featuring crossflow ventilation options.

Housing conditions change for sows depending on their stage of reproduction. Indoor housing for sows includes sow stalls, loose housing, farrowing crates and mating stalls.

Australia's 3 largest pork producers operate indoor housing systems.

Indoor system farming is the default definition of a piggery under the APL Australian Pork Industry Quality Assurance (APIQ) Program. These piggeries do not meet the requirements for certification as a free range or outdoor bred system<sup>86</sup> (as outlined below), but must still comply with Victoria's regulatory framework for the management of pigs and pig welfare (as outlined above), including the Pig Standards.

APL estimates that around 90% of Australian pigs are housed 'indoors' for each stage of the production cycle which allow the use of sow stalls and farrowing crates.<sup>87</sup>

**Free range systems** – pigs are kept outdoors for their entire life, except where temporary confinement is necessary. Free range pork production includes outdoor paddocks (with rooting or foraging areas), wallows, kennels or huts for shelter. The huts also provide additional protection for very young piglets.

In order to gain APL certification as a "free range" farm, producers must comply with specific requirements under the APIQ Program. According to the APIQ Guidelines<sup>88</sup>, free range farms must ensure all pigs live outdoors with free access to shelter at all times, except where temporary confinement applies. Temporary confinement may include keeping piglets in huts or shelters after birth using fenders for up to 14 days for protection, keeper weaners in weaner areas post weaning until piglets are a maximum of 8 weeks of age, holding sows in pens for mating during daylight hours, but not overnight, holding pigs in pens for approved veterinary treatments.

These arrangements must be described in the piggery's Standard Operating Procedures and/or Work Instructions.

Around 5% of Australian sows are certified by the APL as 'free range'.<sup>89</sup>

**Outdoor system farming** – these are described as pigs being 'outdoor bred, raised indoors on straw'. In these systems, pigs live in open spaces, have access to paddocks throughout their adult life and have bedded shelter with adequate feed and water.

According to the APL, piglets are born and raised under these conditions until weaning. Once weaning has occurred, piglets are moved to barns with deep-litter bedding (straw or rice hulls) and remain there until sale.

Similar to free range systems, outdoor system farming piggeries must comply with specific arrangements in the APIQ Guidelines, including that all breeding stock have free access to paddocks at all times and all piglets have free access to paddocks until weaning, except where approved temporary confinement applies. Temporary confinement includes keeping piglets in huts or shelters after birth using fenders for up to 14 days and holding pigs in pens for approved veterinary treatments with a record of confinement kept.<sup>90</sup> Around 4% of Australian sows are certified by the APL as 'outdoor bred, raised indoor on straw'.<sup>91</sup>

<sup>85</sup> Australian Pork Limited, About pig farming, <https://www.australianpork.com.au/about-pig-farming>, accessed on 20-11-2023

<sup>86</sup> Australian Pork Limited website, Certification options, accessed on 22-12-2023

<sup>87</sup> Australian Pork Limited website, [Indoor system farming | Australian Pork](#), accessed on 25-10-2023

<sup>88</sup> Australian Pork Industry Quality Assurance Program, Standards Manual 2022

<sup>89</sup> Australian Pork Limited website, [Free range farming | Australian Pork](#), accessed on 25-10-2023

<sup>90</sup> Australian Pork Industry Quality Assurance Program, Standards Manual 2022

<sup>91</sup> Australian Pork Limited website, [Outdoor system farming | Australian Pork](#), accessed on 25-10-2023



## The industry-led phase out of sow stalls in Australia

Up until recently, sow stalls were widely used in the Australian pork industry and had been for many years. During pregnancy (especially the earlier part of pregnancy), sows can be highly aggressive towards each other.<sup>92</sup>

Sow stalls were used to protect individual pregnant sows from fighting, which can cause both injuries and loss of pregnancy. Sow stalls also allow sows to be protected while they are individually fed, so they will not be pushed away from their feed by a 'bully' sow.<sup>93</sup>

In 2010, APL committed to phasing out sow stalls. The APL Annual Report 2010–2011 stated:

That Australian pork producers commit to pursuing the voluntary phasing out of the use of gestations stalls by 2017 and that Australian pork producers recognise the welfare benefits of gestation stalls, the cost of change and the need for research, investment and off-sets to support the voluntary commitment to change.<sup>94</sup>

The APL Annual Report 2021–2022 noted that 'On behalf of industry, APL has been pursuing codifying the 2010 industry voluntary move to phase out gestation stalls into national guidelines'. APL further noted the process has been reprioritised for 2022–23.<sup>95</sup>

### 5.1 International breeding and housing practices

Table 4 sets out the requirements for the breeding and housing of pigs in Victoria (Pig Welfare Standards), Canada, the United Kingdom (UK), European Union (EU), and the United States of America (USA). The requirements cover accommodation (including sow stalls, farrowing crates, space allowance and provision of enrichment) and husbandry procedures (including elective husbandry procedures).

Jurisdictions legislate the requirements through various instruments including regulations, codes and advisory material. To simplify this, comparisons are drawn about mandatory requirements and recommended guidelines. Text in black font in Table 4 refers to mandatory requirements. Text in blue font refers to recommended guidelines. The requirements in Table 4 are direct extracts from their sources.

New Zealand is not included as, on 3 December 2020, the New Zealand Ministry for Primary Industries released a draft Cabinet paper seeking policy approval to phase out the use of farrowing crate and mating stall systems in its pig industry, via regulations.<sup>96</sup>

On 14 December 2020, the New Zealand Cabinet agreed to new regulations with a phase out period of 5 years until 2025.<sup>97</sup>

It should be noted that pig management in the USA is complex and differs between states. The US Federal Regulations have therefore been used for comparison, where available. The US Federal Regulations have been used and where possible, further information from State-specific arrangements are included. Although animal cruelty is a criminal offence in the USA, there are no national government welfare standards applying to farmed pigs.<sup>98</sup>

The United States Department of Agriculture (USDA) provides non-regulatory scientific guidelines and recommendations for the care and husbandry of swine to influence best practices in swine production, while the US National Pork Board maintains and operates the Pork Quality Assurance (PQA) Plus programs as well as the Common Swine Industry Audit.

Many pork producers elect to sign up to these programs in order to demonstrate their credibility and commitment to animal welfare. Most major food retailers and restaurants have established minimum welfare standards under these 2 programs.

<sup>92</sup> Australian Pork Limited website, [Sow stalls | Australian Pork](#), accessed on 14-12-2023

<sup>93</sup> Australian Pork Limited website, [Sow stalls | Australian Pork](#), accessed on 14-12-2023

<sup>94</sup> Australian Pork Limited, Annual Report 2010-2011, p 5

<sup>95</sup> Australian Pork Limited, Annual Report 2021-2022, p 28

<sup>96</sup> <https://www.mpi.govt.nz/dmsdocument/52297/direct>, accessed on 29-11-2023

<sup>97</sup> <https://www.mpi.govt.nz/dmsdocument/52306/direct>, accessed on 29-11-2023

<sup>98</sup> MSD Animal Health Swine - <https://www.msd-animal-health-swine.com/market-trends/pig-welfare-in-the-us/>, accessed on 8 Dec 2023

Additionally, over the past 2 decades, 9 states<sup>99,100</sup> in America have passed animal welfare regulations in hog production that ban the use of gestation crates and stipulate space requirements for animals to stand and turn around.

Two of the states included in this ban, California and Massachusetts, have also passed retail restrictions that prohibit the sale of pork originating from animals kept in gestation crate systems or their direct offspring.

The proportion of the national herd covered by gestation crate bans is small and was estimated at 3%, based on expected production in 2022.<sup>101</sup> Projected coverage is expected to remain below 10% of the national herd by 2026, when the regulations go into full effect in Ohio (the largest hog-producing state to include the ban).<sup>102</sup>

Table 44 demonstrates that Victoria's approach to breeding, housing, enrichment and husbandry are generally consistent with international approaches.

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<sup>99</sup> USDA, [Hog Welfare Laws cover 9 States and 3 percent of the national herd in 2022](#), accessed 18 December 2023

<sup>100</sup> States include Rhode Island, Maine, Massachusetts, Oregon, Florida, California, Arizona, Colorado, Michigan, Ohio

<sup>101</sup> USDA, [Hog Welfare Laws cover 9 States and 3 percent of the national herd in 2022](#), accessed 18 December 2023

<sup>102</sup> [Economic Research Service - US Department of Agriculture, 2022](#)

**Table 4 Pig accommodation requirements, Victoria and international**

Victoria	Canada	UK	EU	USA
<p>A sow must not be confined in a stall for more than 6 weeks of any gestation period. An exception is for individual sows that are under veterinary advice or special care by a competent stock-person.<sup>103</sup></p> <p>Sows must not be confined in farrowing crates for more than 6 weeks in any one reproductive cycle. Exception in emergency or exceptional circumstances including when a sow is required to foster a second litter after her own piglets are weaned.<sup>104</sup></p> <p>Stalls and farrowing crates must be designed, constructed, maintained and operated to minimise aggression between pigs and overlying of piglets by sows.<sup>105</sup></p>	<p>Sows must not be kept in farrowing crates for more than 6 weeks in any one reproductive cycle except in exceptional circumstances (e.g. when a sow is required to foster a second litter).</p> <p>As of 1 July 2024 mated gilts and sows must be housed in groups or in individual pens or in stalls, if they are provided with the opportunity to turn around or exercise periodically, or other means that allow greater freedom of movement.<sup>106</sup></p>	<p>Dry sows and gilts must be kept in groups except during the period between 7 days before the predicted day of farrowing and the day on which weaning of piglets (including any piglets fostered) is complete.</p> <p>Where a farrowing crate system is used, piglets must have sufficient space to suckle without difficulty.<sup>107</sup></p>	<p>Where a farrowing crate system is used, piglets must have sufficient space to suckle without difficulty.<sup>108</sup></p>	<p>Gestation crates are banned in 9 USA states, under hog welfare laws (further details of the ban are outlined above).</p>

<sup>103</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 4, Standard 4.1.5

<sup>104</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 4, Standard 4.1.7

<sup>105</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 4, Standard 4.1.4

<sup>106</sup> Canada Code of Practice for the care and handling of pigs 2014, Section 1, Requirement 1.1

<sup>107</sup> UK Code of Practice for the welfare of pigs 2020, Section 2, pp 40-42

<sup>108</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure I, Chapter II, C2

## Group housed pigs - Space allowance

Victoria	Canada	UK	EU	New Zealand	USA
<p>Minimum space requirement for pigs in group housing:</p> <p>(a) for each sow the floor of the spacing is not less than 1.4 m<sup>2</sup>,</p> <p>(b) for each gilt weighing more than 100 kg the floor of the space is not less than 1 m<sup>2</sup>, and</p> <p>(c) in other case, the floor space of the housing is not less than the number of square metres calculated in accordance with the following formula: <math>0.030 \times (P^{0.67})</math> where P is the average weight in kilograms of all pigs kept in the housing.<sup>109</sup></p>	<p>All grouped housed sows must be able to stand, move about and lie down without interference with each other in a way that compromises welfare and space must be provided for separation of dunging from lying and eating areas.</p> <p>When calculating space allowance for pigs, a formula that relates body weight to body surface area is used. Floor space allowance is expressed using a k-value, which, when multiplied by a pig's body weight(kg)<sup>0.667</sup>, gives the floor surface area in m<sup>2</sup>.</p> <p>Pigs must be housed at a space allowance of <math>k \geq 0.0335</math>.<sup>110</sup></p>	<p>Total unobstructed area available to gilts and sows in groups must be at least 1.64 m<sup>2</sup> and 2.25 m<sup>2</sup> respectively.<sup>111</sup></p>	<p>The unobstructed area available to adult boar in boar pens must be at least 6 m<sup>2</sup>. An unobstructed area behind the sow or gilt must be available for ease of natural or assisted farrowing.<sup>112</sup></p>	<p>All group housed pigs must be able to stand, move about and lie down without undue interference with each other in a space that provides for separation for dunging, lying and eating areas. The minimum unobstructed lying space allowance for grower pigs must be in accordance with the following formula: Area (m<sup>2</sup>) per pig = <math>0.03 \times \text{liveweight}^{0.67}</math> (kg).<sup>113</sup></p>	<p>Hog welfare laws introduced in 9 USA states, require that hogs have sufficient space to enable the animal to turn around, lie down, stand up and extend their limbs.</p> <p>In 2022, California moved to introduce Proposition 12, which, among other animal welfare requirements, requires sows to have space of at least 24 square feet (2.2 square meters).</p> <p>Under Proposition 12, producers can hold pigs in non-compliant enclosures for individual treatment or veterinary purposes — examinations, treatments, testing, or prevention of animal disease, injury, or harm — administered by a licensed veterinarian. However, producers can only do this for 6 hours within a 24-hour period. Producers cannot hold a pig in a non-compliant space for more than 24</p>

<sup>109</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 4, Standard 4.1.2(3)

<sup>110</sup> Canada Code of Practice for the care and handling of pigs 2014, Section 1, Requirement 1.2

<sup>111</sup> UK Code of Practice for the welfare of animals 2020, Section 2, pp 43

<sup>112</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure I, Chapter II, A, B4, C2

<sup>113</sup> NZ Code of Welfare: Pigs 2008, Part 4, Minimum Requirement 6(b), (c)

Victoria	Canada	UK	EU	New Zealand	USA
					<p>hours in a 30-day period<sup>114</sup>.</p> <p>From Jan. 1, 2024, all breeding swine farms will need Prop 12 certification for buyers and pork distributors to sell pork to the California market.</p> <p>According to a 2021 report by Rabobank, the industry standard in the USA, prior to the introduction of California's new rules, is between 14 and 20 square feet (1.3 to 1.9 square meters)<sup>115</sup>.</p>

## Enrichment

Victoria	Canada	UK	EU	New Zealand
<p>Where tail biting is a problem, all aspects of the environment, feeding and management should be investigated to identify the contributing factors so that remedial action can be taken, such as environmental enrichment with straw or other materials that can be manipulated.<sup>116</sup></p>	<p>Pigs must be provided with multiple forms of enrichment that aims to improve the welfare of the animals through the enhancement of their physical and social environments.<sup>117</sup></p>	<p>To enable proper investigation and manipulation activities, all pigs must have permanent access to a sufficient quantity of material that does not adversely affect their health such as straw, hay, wood, sawdust, mushroom compost, peat or a mixture.<sup>118</sup></p>	<p>Pigs must have permanent access to a sufficient quantity of material to enable proper investigation and manipulation activities, such as straw, hay, wood, sawdust, mushroom compost, peat or a mixture of such, which does not compromise the health of the animals.<sup>119</sup></p>	<p>Pigs must be managed in a manner that provides them with sufficient opportunities to express and satisfy their normal behaviours. These include feeding, drinking, sleeping, dunging, urination, vocalisation, thermoregulation, and social contact.<sup>120</sup></p>

<sup>114</sup> [California Officials Explain Prop 12 Requirements.](#) - Successful Farming Magazine, July 14 2023

<sup>115</sup> ['US Pork Supply Chain Locked in Limbo' – Rabobank, February 2021](#)

<sup>116</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Guideline 5.6.9

<sup>117</sup> Canada Code of Practice for the care and handling of pigs 2014, Section 1, Requirement 1.8

<sup>118</sup> UK Code of Practice for the welfare of animals 2020, Section 1, pp23

<sup>119</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure I, Chapter I, General Condition 4

<sup>120</sup> NZ Code of Welfare: Pigs 2008, Part 5, Minimum Standard 9

## Husbandry

Procedure	Victoria	Canada	UK	EU	New Zealand
Castration	<p>Castration on a pig over the age of 21 days old can only be done by a veterinary practitioner with anaesthesia.</p> <p>If surgical castration is considered necessary for pigs under 21 days, it should be performed by a trained and competent operator. It is recommended that piglets be castrated after 2 days of age after they have established their suckling order and before 7 days of age.<sup>121</sup></p>	<p>Castration performed at any age must be done with analgesics to help control post-procedure pain. Castration performed after 10 days of age must be done with anaesthetic and analgesic to control pain.<sup>122</sup></p>	<p>Castration is a mutilation and should be avoided wherever possible. An anaesthetic and additional prolonged analgesia must be administered where the animal is aged 7 days or over.<sup>123</sup></p>	<p>Castration after seventh day of life, must be done under anaesthetic and additional prolonged analgesia by a veterinarian.<sup>124</sup></p>	<p>Castration must be carried out by a veterinarian or a veterinary student under direct supervision of a veterinarian throughout the procedure. The pig must be given pain relief at time of procedure. Surgical castration should not be undertaken.<sup>125</sup></p>
Tail docking	<p>Tail docking should be avoided where possible. Where performed as a preventative measure, it should be carried out before pigs are 7 days of age.<sup>126</sup></p>	<p>Tail docking performed at any age must be done with analgesics to help control post-operative pain. Tail docking of pigs over 7 days of age must be done with pain control.<sup>127</sup></p>	<p>Routine tail docking is not permitted. The method used must involve quick complete severance of the tail. An anaesthetic and additional prolonged analgesia must be administered where the animal is aged 7 days or over.<sup>128</sup></p>	<p>Must not be carried out routinely. If performed after seventh day of life, must be under anaesthetic and additional prolonged analgesic.<sup>129</sup></p>	<p>Tail docking of pigs that are 7 days of age or over must be carried out by a veterinarian or a veterinary student under direct supervision of a veterinarian throughout the procedure. The pig must be given pain relief at time of procedure.</p>

<sup>121</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Guideline 5.6.5,5.6.7

<sup>122</sup> Canada Code of Practice for the care and handling of pigs 2014, Section 4, Requirement 4.5.1

<sup>123</sup> UK Code of Practice for the welfare of animals 2020, Section 1, pp 38

<sup>124</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure I, Chapter I, General Condition 8

<sup>125</sup> NA Code of Welfare: Pigs 2018, Part 6, Minimum Standard 16(bb), Recommended Best Practice b)

<sup>126</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Guideline 5.6.8, 5.6.10

<sup>127</sup> Canada Code of Practice for the care and handling of pigs 2014, Section 4, Requirement 4.5.3

<sup>128</sup> UK Code of Practice for the welfare of animals 2020, Section, pp32

<sup>129</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure I, Chapter I, General Condition 8

Procedure	Victoria	Canada	UK	EU	New Zealand
					Other measures to control tail biting should be considered before tail docking is undertaken. Where tail docking is undertaken as a preventative measure, it should be carried out on the piglets within 72 hours of birth and only one-third of the tail should be removed. <sup>130</sup>
Teeth clipping/grinding	Should not be routinely required. If aggression between littermates or damage to the sow is a problem, this procedure should be carried out within 3 days of birth. <sup>131</sup>	Need for teeth clipping must be evaluated and performed only when deemed necessary. <sup>132</sup>	Routine clipping or grinding of teeth is not permitted. The procedure may only be carried out on an animal that is aged not more than 7 days. <sup>133</sup>	Must not be carried out routinely. A uniform reduction of corner teeth of piglets by grinding or clipping not later than the seventh day of life. <sup>134</sup>	If undertaken, must be carried out on a pig that is 4 days of age or under. Needle teeth should be ground rather than cut. <sup>135</sup>
Nose ringing	Should be avoided. May need to be performed as a last resort to prevent adverse effects to the environment, if pigs are kept on pasture. <sup>136</sup>	Nose rings must not be used. <sup>137</sup>	Nose ringing is a mutilation and should be avoided where possible. Where it is necessary to put nose ring pigs, it should only be carried out by a suitably trained and competent person. <sup>138</sup>	Only when the animals are kept in outdoor husbandry systems. <sup>139</sup>	Nose rings or clips must only be used for animal management purposes. <sup>140</sup>

<sup>130</sup> NZ Code of Welfare: Pigs 2008, Part 6, Minimum Standard 16 (ba), Recommended Best Practice c), d)

<sup>131</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Guideline 5.6.12

<sup>132</sup> Canada Code of Practice for the care and handling of pigs 2014, Section 4, Requirement 4.5.4

<sup>133</sup> UK Code of Practice for the welfare of pigs 2020, Section 1, pp 37

<sup>134</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure I, Chapter I, General Condition 8

<sup>135</sup> NZ Code of Welfare: Pigs 2018, Part 6, Minimum Standard 16 (c), Recommended Best Practice e)

<sup>136</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Guideline 5.6.14

<sup>137</sup> Canada Code of Practice for the care and handling of pigs 2014, Chapter 1, Requirement 1.9

<sup>138</sup> UK Code of Practice for the welfare of animals 2020, Section 2, pp 46

<sup>139</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure 1, Chapter I, General Condition 8

<sup>140</sup> NZ Code of Welfare: Pigs 2018, Part 6, Minimum Standard 16 (h)

Procedure	Victoria	Canada	UK	EU	New Zealand
Identification	Where necessary to mark pigs for permanent identification, the ear may be tattooed, tagged, notched or punched, or the body may be tattooed or a micro-chip implanted. Where ear notching is performed, it should be carried out before the piglets are 7 days of age. <sup>141</sup>	Ear notching must only be performed on piglets when deemed necessary and when piglets are less than 14 days of age. <sup>142</sup>	Permitted identification procedures: ear clipping, ear notching, ear tagging, micro-chipping, tattooing. <sup>143</sup>	–	Where performed, ear notching should be done within 72 hours of birth. <sup>144</sup>
Back-fat measurement and pregnancy diagnosis	The recommended method for pregnancy testing and back-fat measurement is with the use of ultrasonic or other non-invasive equipment. <sup>145</sup>	–	–	–	–
Tusk trimming	The boar should be appropriately restrained and if necessary anaesthetised for restraint. Analgesia is not required as the tusk lacks sensory nerves. <sup>146</sup>	The pulp cavity must be avoided during tusk trimming. <sup>147</sup>	Tusk trimming may only be carried out where there is evidence to show that it is necessary to prevent injury to other animals or for safety reasons. <sup>148</sup>	Boars' tusks may be reduced in length where necessary to prevent injuries to other animals or for safety reasons. <sup>149</sup>	Tusk trimming may be trimmed as a precaution in aggressive boars. <sup>150</sup>

<sup>141</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Guideline 5.6.17, 5.6.18

<sup>142</sup> Canada Code of Practice for the care and handling of pigs 2014, Chapter 4, Requirement 4.5.2

<sup>143</sup> UK Code of Practice for the welfare of animals 2020, Annexure 2, pp 49

<sup>144</sup> NZ Code of Welfare: Pigs 2018, Part 6, Recommended Best Practice f (for Minimum Standard 16)

<sup>145</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Guideline 5.6.19

<sup>146</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Guideline 5.6.22

<sup>147</sup> Canada Code of Practice for the Care and Handling of Pigs 2014, Chapter 4, Requirement 4.5.5

<sup>148</sup> UK Code of Practice for the welfare of animals 2020, Section 2, pp 44

<sup>149</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure 1, Chapter I, General Condition 8

<sup>150</sup> NZ Code of Welfare: Pigs 2018, Part 6, Recommended Best Practice g) (for Minimum Standard 16)



## 6. Other animal welfare considerations

### 6.1 Permitted euthanasia methods in Victoria

The Pig Welfare Standards recognise there may be circumstances when pigs may need to be destroyed for humane reasons, such if they are suffering injury or disease.<sup>151</sup> Table 5 is taken from Appendix V, Page 38 of the Pig Welfare Standards and outlines methods suitable for euthanising pigs, including:

- Description of the method
- Pig welfare outcomes

Suitability – based on the size of the pig.<sup>152</sup>

Method	Human safety risk	Pig welfare	Skill required	Cost	Class of pig
<b>Carbon dioxide (CO<sub>2</sub>)</b>	Moderate. Use in well-ventilated area.	Good. Can cause aversive reactions.  Causes respiratory arrest following anaesthesia.	Moderate.	Moderate. Initial cost of equipment, CO <sub>2</sub> supply.	Pigs less than 30 kg.
<b>Anaesthetic overdose</b>	Low if assistance for restraint is available.	Good. Causes respiratory and cardiac arrest following anaesthesia.	High. Must be performed by a registered veterinary practitioner.	Moderate. Anaesthetic solution.	All classes of pigs.
<b>Gunshot</b>	Moderate to high. Training and gun licence required. Security of firearm.	Good. Correct aim essential.	Moderate to high.	Moderate, initial cost of firearm and ammunition.	Pigs greater than 15 kg.
<b>Penetrating captive bolt</b>	Moderate to high. Training required. Security of captive bolt.	Good. Correct aim essential.	Moderate.	Moderate. Initial cost of captive bolt.	Pigs greater than 15 kg.
<b>Blunt trauma to head</b>	Low.	Good if performed on small pigs with rapid force strong enough for instant death.	Low. Proper training required.	None.	Pigs less than 15 kg.

**Table 5 Methods for humane destruction of pigs (euthanasia), Pig Welfare Standard<sup>153</sup>**

<sup>151</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 7, pp 28

<sup>152</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Appendix V, pp 37 - 40

<sup>153</sup> Pig Welfare Standards, Appendix V, Table 9

## 6.2 Permitted euthanasia methods internationally

Table 6 sets out requirements for the euthanasia of pigs in Victoria (Pig Welfare Standards), Canada, the United Kingdom (UK), European Union (EU), and the United States of America (USA). The Table shows that euthanasia methods in Victoria are broadly consistent with international jurisdictions.

Victoria	Canada	UK	EU	New Zealand	USA
<p>The method of euthanasia must cause a sudden unconsciousness with death occurring when unconscious.</p> <p>Destruction of pigs must be done by a suitably qualified person or person acting under direct supervision of a suitably qualified person. An exception is provided for urgent circumstances where the services of a suitably qualified person are not reasonably available and destruction of the pig is necessary to prevent undue suffering of the pig.</p> <p>The animal should be quietly handled beforehand to ensure it is not unnecessarily distressed or alarmed.<sup>154</sup></p>	<p>Any euthanasia method must result in an immediate loss of sensibility with minimal pain and distress, followed by rapid progression to death.</p> <p>The method used to euthanise pigs must be administered in a manner that is quick and causes the least possible pain and distress. Before euthanasia, animals must not be dragged, prodded, forced to move on broken limbs, or made to move when pain and suffering will occur.<sup>155</sup></p>	<p>Animals must be killed humanely using a method that immediately renders them unconscious until death.<sup>156</sup></p>	<p>Animals shall be spared any avoidable pain, distress or suffering during their killing and related operations. Loss of consciousness and sensibility shall be maintained until the death of the animal.<sup>157</sup></p>	<p>When a pig needs to be killed it must be handled, restrained and killed in such a manner as to minimise unnecessary pain and distress before death. Pigs must be rendered insensible and remain in that state until death.<sup>158</sup></p>	<p>In the case of cattle, calves, horses, mules, sheep, swine and other livestock, all animals are rendered insensible to pain by a single blow or gunshot or an electrical, chemical or other means that is rapid and effective, before being shackled, hoisted, thrown, cast, or cut.<sup>159</sup></p>

**Table 6: Requirements for euthanasia of pigs, Victoria and international.** ■ Standard ■ Recommendations / Guidelines

<sup>154</sup> Victorian Standards and Guidelines – Welfare of Pigs Revision 1 2012, Part 5, Standard 7.1, 7.2, Guideline 7.3

<sup>155</sup> Canada Code of Practice for the care and handling of pigs 2014, Section 6, Requirement 6.3

<sup>156</sup> UK Code of Practice for the welfare of animals 2020, Section 1, pp 18

<sup>157</sup> EU Council Directive 1009/2009 of 24 September 2009, Chapter II, Article 3, General Requirement 1, Article 4, General Requirement 1

<sup>158</sup> NZ Code of Welfare: Pigs 2018, Part 8, Minimum Standard 19 (b), (c)

<sup>159</sup> US The Humane Slaughter Act (7 U.S.C. 1901-1906), Section 1902(a)

## 6.3 Feed and water requirements

### Pig welfare considerations

Table 7 sets out the feed and water requirements for pigs in Victoria, Canada, the United Kingdom (UK), European Union (EU), New Zealand and the United States of America (USA) with international codes of practice and standards.

Feed and water requirements for pigs in Victoria are set out in the Pig Welfare Standards as well as the Australian Animal Welfare Standards and Guidelines for Land Transport of Livestock (Land Transport Standards). Although not an explicit welfare standard, AS4696 is also included as it is a licence condition of PrimeSafe.

The Table shows that feed and water requirements across jurisdictions are generally consistent.

Feed and water	
Pig Welfare Standards	Pigs must be provided with daily access to feed that maintains health and physiological requirements. <sup>160</sup> Drinking water or another wholesome liquid must be easily available at all times other than handling and management procedures to meet physiological water requirements. <sup>161</sup>
Land Transport Standards	A person in charge must ensure time off water does not exceed the term periods given below for each class of pig: Pigs: 24 hours maximum lactating sows and piglets: 12 hours maximum, weaners:12 hours maximum. <sup>162</sup>
Australian Standard AS4696	Animals are provided with feed (where appropriate), water, shade, shelter, space and ventilation that is sufficient to minimise stress to the animals. <sup>163</sup>
Canada	Pigs must be provided with daily access to feed that maintains health and meets physiological requirements. Pigs must be fed a diet which is appropriate to their species, age and production phase. All pigs must have continual access to a supply of palatable water that is not harmful to health and in sufficient quantity to meet the needs of the animals. <sup>164</sup>
UK	All pigs must be fed at least once a day. All pigs over 2 weeks of age must have continuous access to a sufficient quantity of fresh drinking water. <sup>165</sup>
EU	All pigs must be fed at least once a day. All pigs over 2 weeks of age must have permanent access to a sufficient quantity of fresh water. <sup>166</sup>

<sup>160</sup> Victorian Standards and Guidelines – Welfare of pigs Revision 1 2012, Chapter 3, Standard 3.1.1

<sup>161</sup> Victorian Standards and Guidelines – Welfare of pigs Revision 1 2012, Chapter 3, Standard 3.2.1

<sup>162</sup> Australian Animals Welfare Standards and Guidelines – Land Transport of Livestock 2012, Part B, Standard SB9.1

<sup>163</sup> Australian Standard for the hygienic production and transportation of meat and meat products for human consumption 2007, Part 7, Standard 7.4

<sup>164</sup> Canada Code of Practice for the care and handling of pigs 2014, Section 2, Requirements 2.1, 2.3

<sup>165</sup> UK Code of Practice for the welfare of pigs 2020, Section 1, pp 28, 29

<sup>166</sup> EU Council Directive 2008/120/EC of 18 December 2008, Annexure I, Chapter I, General Condition 6, 7

Feed and water	
New Zealand	All pigs must receive adequate quantities of food and nutrients each day to enable each pig to maintain good health, meet physiological demands and avoid metabolic and nutritional disorders. An adequate daily supply of water at a temperature that does not inhibit drinking must be accessible at all times. <sup>167</sup>
USA	<p>Feed and water requirements and/or recommendations vary by State. For example, Ohio – as one of 9 states with pig welfare laws in place – requires that persons in charge of pigs “(a) Adequately protect pigs from direct sunlight and adverse weather conditions; (b) Provide supplemental heat or a regular, ample supply of bedding in cold weather; and, (c) Have water and feed supply systems that function properly and be readily accessible under all weather conditions.</p> <p>The Common Swine Industry Audit, administered by the US National Pork Board requires that: "animals must have access to feed and water according to the site's Standard Operating Procedure. All pigs must have free access to water at least once each day. Various feeding protocols may be used throughout the industry. Adequacy of feeding protocols are evaluated in this audit through body condition scores."<sup>168</sup></p>

**Table 7: Feed and water requirements for pigs, Victoria and international.** ■ Code/Standard ■ Recommendation/Guideline

<sup>167</sup> NZ Code of Welfare: Pigs 2018, Part 3, Minimum Standard 2(a), 4

<sup>168</sup> Common Swine Industry Audit Education Handbook – US National Pork Board 2015

## Appendix A Victorian Acts relevant to the management of pig welfare

**Table A-1 Summary of Victorian Acts relevant to pig welfare**

	POCTA Act <sup>169</sup>	Livestock Management Act <sup>170</sup>	Meat Industry Act <sup>171</sup>
Purposes	<ul style="list-style-type: none"> <li>(a) Prevent cruelty to animals</li> <li>(b) encourage considerate treatment of animals</li> <li>(c) improve level of community awareness about prevention of cruelty to animals.</li> </ul>	To regulate livestock management in Victoria.	<ul style="list-style-type: none"> <li>(a) set standards for meat production for human consumption and pet food</li> <li>(b) establishes a licensing and inspection system and a mechanism for adopting and implementing quality assurance programs to ensure those standards are met.</li> </ul> <p><i>*Note: The Meat Industry Act does not include any provisions for animal welfare and is a food safety law.</i></p>
Application	<p>Does not apply to slaughter of animals in accordance with the Meat Industry Act or any Commonwealth Act.</p> <p>Does not apply to slaughter of a farm animal on a farm if –</p> <ul style="list-style-type: none"> <li>(a) it is slaughtered for consumption on that farm and</li> <li>(b) it is slaughtered in a humane manner and</li> <li>(c) it is not slaughtered for sale and</li> <li>(d) it is not slaughtered for use in the preparation of food for sale and</li> <li>(e) it is not removed from that farm.</li> </ul>	<p>Does not affect the operation of, or anything done or required to be done under the POCTA Act, the Meat Industry Act and other specified Acts.</p> <p>For the purposes of the POCTA Act, it is a defence to an offence under the Act if the person was carrying out a regulated livestock management activity and acting in compliance with a prescribed management standard.</p>	<p>Does not apply to meat from a consumable animal if the meat is in a dwelling or dried meat in a retail shop.</p> <p>Does not apply to slaughter of an animal on a farm if –</p> <ul style="list-style-type: none"> <li>(a) it is slaughtered for consumption on that farm and</li> <li>(b) it is slaughtered in a humane manner and</li> <li>(c) it is not slaughtered for sale and</li> <li>(d) it is not slaughtered for use in the preparation of food for sale and</li> <li>(e) it is not removed from that farm.</li> </ul> <p>Does not apply to meat to which a brand has been applied in accordance with the Australian <i>Export Control Act 1982</i>.</p> <p>Does not apply to meat that is processed, packaged for retail sale in Australia and labelled at places licensed or authorised in accordance with laws of another State or Territory.</p>
Regulator	Agriculture Victoria, DEECA – for 10 or more pigs RSPCA Victoria – less than 10 pigs	Agriculture Victoria, DEECA	PrimeSafe
Regulated	Person in charge of an animal –	Livestock operator –	Meat processing facility – <ul style="list-style-type: none"> <li>(a) a general meat processing facility</li> <li>(b) a pet food processing facility</li> </ul>

<sup>169</sup> All information excerpted from the [POCTA Act Excerpts taken from the POCTA Act](#)

<sup>170</sup> Excerpts taken from the [Livestock Management Act](#)

<sup>171</sup> Excerpts taken from the [Meat Industry Act](#)

POCTA Act <sup>169</sup>	Livestock Management Act <sup>170</sup>	Meat Industry Act <sup>171</sup>
<p>(a) a person who has the animal or thing in the person's possession or custody, or under the person's care, control or supervision</p> <p>(b) any employee or agent of the owner of the animal or thing if a person referred to in paragraph (a) is bound to comply with the directions of that employee or agent in respect of the animal or thing.</p>	<p>(a) a person operating a business that engages in a regulated livestock management activity</p> <p>(b) a person in charge of livestock.</p>	<p>(c) a butcher shop</p> <p>(d) any place or vehicle that is used for the sale of meat for human consumption or the handling, storage or transportation of meat for sale for human consumption but does not include a place or vehicle –</p> <p>(i) where more manufactured meat, or products that contain some or no meat, is sold than unmixed meat or</p> <p>(ii) where meat is sold to be consumed at that place or vehicle.</p> <p>Note: “general meat processing facility” includes an abattoir, which is defined to mean –</p> <p>(a) a place used for slaughter or consumable animals for human consumption or</p> <p>(b) a vehicle used for slaughter of consumable animals for human consumption.</p> <p>Meat transport vehicle.</p>

## Appendix B Regulatory activities and outcomes, 2018 to 2023 – Agriculture Victoria

**Table B-1 Number of complaints**

Year	Mixed-species		Pigs only	
	Complaints	Substantiated	Complaints	Substantiated
2018	19	4	20	9
2019	17	2	10	2
2020	8	0	9	1
2021	10	0	15	8
2022	17	4	26	8
2023	15	1	13	2
<b>Total complaints</b>	<b>179</b>			
<b>Total complaints (pigs only)</b>	<b>93</b>			
<b>Total substantiated complaints</b>	<b>41</b>			

Mixed species – multiple species were identified in the complaint, including pigs.

Pigs only – pigs were the only species referenced in the complaint.

Complaints – complaints may be received from various difference sources. They reflect the opinion of the complainant and visibility of the issue.

Substantiated – indicates that officers have investigated and found that a regulatory outcome needed to be applied. For this analysis, in mixed species complaints, only those where the pig-related issue was substantiated are recorded.

**Table B-2 Source of complaints**

Source	No. complaints
RSPCA Victoria	68 (38%)
Member of the public	55 (31%)
Local government	22 (12%)
Referral from DAWE/DAWR/DAFF (export registered abattoir)	20 (11%)
DPI / DSE / DEPI / DEDJTR / DJPR <sup>172</sup>	6 (3%)

<sup>172</sup> DPI/DSE/DEPI/DEDJTR/DJPR were the previous Victorian Government departments responsible for the management of Agriculture and Animal Welfare in Victoria over the past decade. Agriculture Victoria and Animal Welfare Victoria now sits within the Department of Energy, Environment and Climate Action.

Source	No. complaints
Animal welfare activist/organisation (excluding RSPCA Victoria)	3 (2%)
Veterinary practitioner	2 (1%)
Police	1 (1%)
PrimeSafe	1 (1%)
Self-observed	1 (1%)

**Table B-3 Investigation outcomes (all complaints)**

Investigation outcome	No. complaints
Unsubstantiated	106 (59%)
Substantiated	41 (23%)
Referred to other agency / RSPCA Victoria	22 (12%)
Insufficient information to action complaint	6 (3%)
Managed with phone call / extension material	3 (2%)
Not stated	1 (1%)

**Table B-4 Location at which alleged offence took place**

Location of alleged offence	All complaints	Pigs only complaints	Substantiated
Farm	158 (88%)	74 (80%)	34 (83%)
Abattoir / Processing plant	12 (7%)	12 (13%)	6 (15%)
Transport / Road	6 (3%)	6 (6%)	1 (1%)
Saleyards	1 (1%)	0	0
Other	2 (1%)	1 (1%)	0

**Table B-5 Size of farm at which alleged offence took place**

Location of alleged offence	Substantiated	Av. no. pigs present
Small (<10 pigs)	12 (29%)	4
Medium (10-50 pigs)	11 (27%)	29
Large (>50 pigs)	9 (22%)	223*



Not known	9 (22%)	–
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Indicative figures only, completeness and accuracy of records are questionable for this parameter.

\* largest = 337 pigs

**Table B-6 Nature of alleged offences (all complaints vs. substantiated complaints)**

Investigation outcome	All complaints	Pigs only complaints	Substantiated
Failure to provide sufficient feed, drink or shelter	102 (57%)	37 (40%)	23 (56%)
Failure to provide appropriate treatment for sick or injured animals	60 (34%)	32 (34%)	18 (44%)
Causing unreasonable pain or suffering by an act or omission	66 (37%)	29 (31%)	10 (24%)
Causing unreasonable pain or suffering by loading, crowding or confining an animal	25 (14%)	18 (19%)	7 (17%)
Causing unreasonable pain or suffering by driving, conveying, carrying or packing an animal	6 (3%)	6 (6%)	3 (7%)
Other	32 (18%)	22 (24%)	7 (17%)

Complaints may relate to more than one alleged offence.

In this analysis, for both all complaints and substantiated complaints, the alleged offence refers to the allegation made at the time of the complaint.

**App Table B-7 Regulatory outcomes applied to substantiated cases, 2018–23**

Regulatory outcome	No. outcomes issued
Notice to comply	17
Advisory letter	32
Warning letter	6
Prosecution	1

## Appendix C Regulatory activities and outcomes, 2018 to 2023, PrimeSafe

### Animal welfare enquiries

PrimeSafe provides general advice to licensees and prospective licensees that includes:

General clarification or interpretation of Standards, legislation and guidelines

Responding to general enquiries

Assisting prospective licensees with PrimeSafe licensing requirements and defining appropriate licensing categories

Conducting workshops and forums for licensees to assist them in their understanding of guidelines, licensing and compliance with Australian standards

The publication and provision of general food safety information.

PrimeSafe also responds to requests for information from existing and prospective licensees, consumers, local government, state government agencies and other food regulators. Enquiries related to animal welfare are a small percentage of overall enquiries received by PrimeSafe, details of which are outlined in table C-1 below.

**Table C-1 Enquiries about Animal Welfare received by PrimeSafe**

	2022/23	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16	Total (Average)
Animal welfare enquiries	72	49	103	175	49	41	42	64	595 (74)
Total enquiries	4,123	4,178	3,250	2,371	1,658	2,329	1,956	2,023	21,888 (2,736)
Percentage of total enquiries related to animal welfare	2.0%	1.0%	3.0%	7.0%	3.0%	1.8%	2.1%	3.2%	(2.8%)

\*The number of animal welfare enquiries in the table above is not representative specifically to animal welfare of pigs.

### Animal welfare audit

PrimeSafe requires all meat processing facilities to be subject to independent third-party audits. The frequency of audits for licensees is set by the level of risk inherent in the product processed at the facility. That is, the greater the assessed risk, the greater the number of audits required.

Generally, poultry processing facilities, inedible rendering facilities, domestic abattoirs, game meat processing facilities and pet meat processing facilities are required to submit to audits twice yearly. Where non-conformance is identified at an audit, PrimeSafe may adjust the frequency of audits to ensure that the non-conformance is addressed. When an immediate threat to public health is detected, PrimeSafe may prohibit the operation of the food processing activity and may require that the affected food be recalled. Table C-2 provides animal welfare non-compliance detected at PrimeSafe audits.

**Table C-2 Animal welfare non-compliance detected at PrimeSafe audit**

	2022/23	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16	2014/15	Total (Average)
Animal Welfare CARs	0	0	0	0	1	2	1	0	0	4 (0.4)
Total CARs	170	139	197	186	188	288	194	185	296	1,843 (205)
Percentage of total CARs related to animal welfare non-compliance	0%	0%	0%	0%	0.5%	0.7%	0.5%	0%	0%	(0.22%)

\*The number of animal welfare non-compliance is not specific to pigs.

## Animal welfare surveillance

Unannounced inspections of all licensed abattoirs, pet meat processing facilities that handle live animals, and poultry processing facilities are conducted twice yearly to ensure compliance with the relevant Australian Standard.

These unannounced inspections concentrate on animal welfare and involve an assessment of the restraint, stunning and exsanguination equipment, and related processes, together with a review of the procedures documented in the quality assurance program. Table C-3 below sets out the number of animal welfare issues identified during unscheduled inspections and the number of compliance issues detected overall during those inspections.

**Table C-3 Animal welfare compliance detected at unannounced inspections**

	2022/23	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16	2014/15	Total (Average)
Number of unannounced inspections	70	70	72	77	66	76	84	90	102	707 (78.5)
Animal Welfare non-compliance detected	2	1	2	2	0	3	3	6	1	20 (2.2)
Percentage of non-compliances at unannounced inspections for the year	3%	1%	3%	3%	0%	4%	3.6%	7%	1%	(2.8%)

\*The number of animal welfare non-compliance detected at unannounced inspections is not specific to pigs.

## Animal welfare complaints

**Table C-4 Complaints related to animal welfare relative to all complaints**

	2022/23	2021/22	2020/ 21	2019/ 20	2018/ 19	2017/ 18	2016/ 17	2015/ 16	2014/ 15	Total (Average)
Animal Welfare Complaints received	38	12	13	11	13	13	7	11	7	125 (13.9)
Total complaints received	254	324	369	412	341	381	385	370	334	3170 (352.2)
Animal Welfare Complaints substantiated	4	1	3	1	5	2	3	2	2	23 (2.6)
Total complaints substantiated	49	94	107	119	108	118	123	123	131	972 (108)
Percentage of total substantiated animal welfare complaints of all substantiated complaints	8.2%	1.1%	2.8%	0.8%	4.6%	1.7%	2.4%	1.6%	1.53%	2.4%