

# Inquiry into pig welfare in Victoria

## Submission

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## **APL Submission**

# **Victorian Parliamentary Inquiry into Pig Welfare**

**January 2024**

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## Our values – we care about our pigs, our people, the environment, and our communities.

Our industry is deeply committed to supporting the welfare of the pigs under our care.

We choose to work in an industry that involves the responsibility of nurturing and caring for pigs. The connection between workers and pigs is not merely professional but rooted in a passion for ensuring the health and wellbeing of the animals.

Our industry is privileged to feed communities high quality, nutritious food and provide exemplary care to animals, across every stage of the supply chain. We stand tall as a producer of Australia's second-largest consumed protein and its crucial role in the nation's domestic food production landscape.

Behind every pork product lies a human story. We are not just producers but individuals with families, aspirations and a profound connection to farming. The industry is not merely about economic transactions; it is a mosaic of personal narratives and a way of life for those dedicated to its success.

Beyond these stories, our industry will use this Inquiry to showcase the industry's importance to the nation, Victoria and regional communities.

We encourage the Committee to understand four key fundamental areas of focus for Australia's pork industry:

**Pigs** - A world leader in animal welfare and health. We are an industry that:

- Continually prioritises animal welfare through significant investment in research, development of training resources and adoption of science based best practice.
- Has invested more than \$23 million in levies into animal welfare research over the last ten years adding to the tens of millions invested by organisations such as the Pork CRC and Australasian Pork Research Institute Ltd (APRIL) and the significant investments by producers on farms.
- Recognises the importance of animal care through the entire supply chain with 85% of pigs processed in export-certified abattoirs having independent on-site veterinarians, and
- Has embraced formal quality assurance with independent annual audits accrediting 91% of commercial pork production.

**People** – Ethically produces high welfare pork in ways that supports both our industry's people and our local communities. Our industry:

- Supports Australia's food security with 90% of the 453,426 metric tonnes of pork produced annually staying in Australia to feed Australian families and all fresh pork being domestically sourced, and

- Is an important contributor towards Victorian food security through provision of locally sourced, nutritious, versatile and affordable lean protein.

**Planet** - A world leader in environmental best practice. Our industry has:

- A low environmental footprint with only 2% of total Australian agricultural emissions attributable to the pork industry,
- Continued to demonstrate its environmental credentials through a 73% reduction in emissions during the past 40 years and achieved an 80% reduction in water use, and
- An ongoing commitment towards a circular economy and having 60% of producers using waste recycling and renewable energy by 2030.

**Prosperity** - A revolutionary contributor to Australia's economy and those who work within the sector. Our industry contributes:

- \$6 billion to the Australian economy with approximately \$1.38 billion entering the Victorian economy annually,
- Farmgate value of \$2.245 billion nationally with a Victorian farmgate value of \$527 million,
- Approximately \$4,500 to the local economy per sow and up to \$6,400 if it includes a local processing facility, and
- Jobs within rural and regional Victoria - for every 1000 sows there are 37 jobs created. In 2022-23, Victorian pig farming activities alone supported 3,000 full time equivalent jobs, which generated \$255.2 million in household incomes for Victorian families.

## Executive Summary

Australian Pork Ltd (APL) is the peak national representative body for Australian pig producers. It is a producer-owned company combining research and innovation, marketing, export development and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry.

The domestic pork industry is a vital part of Australia's food supply chain. Pork is the second most consumed meat in Australia and all fresh pork consumed within the country is domestically sourced.

The Australian pork industry contributes around \$6 billion in gross domestic product to the economy and supports approximately 34,600 full time equivalent jobs. The industry is domestically focused with around 90% of our production providing high quality protein for Australians. The value of the 10% exported in 2022-23 was \$182 million. In 2022-23, the industry produced 453,426 metric tonnes of pork.

Our industry is national, with producers raising pigs at 6,314 sites across Australia (at 1 July 2023). The commercial sow herd is predominantly located in regional areas of Qld, Vic, SA, WA and NSW.

APL holds a number of roles on behalf of the industry:

- The pork Research, Development and Extension organisation leading research in partnership with the Australian governments and research community,
- The marketing arm of the pork industry, managing national campaigns to raise demand and increase awareness of high-quality Australian pork and smallgoods,
- The peak body for the Australian pork industry, representing pork within the National Farmers' Federation (NFF) and other representative frameworks,
- Leading the pork industry's Sustainability Framework and part of the sector-wide collaborative effort to develop an Australian Agricultural Sustainability Framework, coordinated by the NFF on behalf of the Federal Department of Agriculture, Forestry and Fisheries (DAFF), and
- The industry signatory to the Emergency Animal Disease Response Agreement (EADRA).

As the peak body for the Australian pork industry, due to concerns about privacy of their contact information, APL has been requested to provide an avenue for producers and other stakeholders to provide submissions in a safe and confidential manner. These submissions and other letters of support can be found in Appendix B.



## Response to the Terms of Reference

When addressing the terms of reference APL has taken the opportunity to highlight the current practice within the industry. Current practice which considers regulatory requirements and the ongoing evolution of science-based best practice.

### **1. Existing regulatory frameworks: To understand and thoroughly consider the broad range of strong regulations and best practice standards the industry operates under.**

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

Industry and government compliance and enforcement activities are reported within a range of Industry, State and Federal Government mechanisms. The Australian pork industry undertakes significant research, development and extension activities to support supply chain compliance within the complex range of regulatory frameworks.

The regulatory frameworks we operate under include:

- *Prevention of Cruelty to Animals Act 1986* and *Prevention of Cruelty to Animals Regulations 2019* (Victoria),
  - The Animal Welfare Victoria investigation, compliance and enforcement team,
- *Impounding of Livestock Act 1994* and *Impounding of Livestock Regulations 2018*,
  - Police provisions to respond to cruelty complaints, \$ penalty units for non-compliance (250 units = \$48,000),
- *Livestock Management Act 2010* and *Livestock Management Regulations 2021* (Victoria),
  - Victorian Standards and Guidelines for the Welfare of Pigs (Pig Welfare Standards),
- *Meat Industry Act 1993* and *Meat Industry Regulations 2015* (Victoria),
- Australian Standard for the *Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS4696:2023)*,
- *Livestock Disease Control Act 1994* and *Livestock Disease Control Regulations 2017* (Victoria),
- *Veterinary Practice Act 1997* and *Veterinary Practice Regulations 2018* (Victoria),
- Australian Animal Welfare Standards and Guidelines (and the associated review/renewal process),
  - Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP),
  - Australian Animal Welfare Standards and Guidelines for Land Transport of Livestock (Land Transport Standards) and Fit for Intended Journey guide,
- Agricultural and Veterinary Chemicals Acts (Federal and State),
- Australian Pork Industry Quality Assurance Program (APIQ<sup>√</sup>®),
- Codes of Practice for the Welfare of Animals at Saleyards July 2020 (Victoria)

- *Export Control Act 2020* and the Export Control (Meat and Meat Products) Rules 2021 (Federal), and
  - Department of Agriculture, Fisheries and Forestry (DAFF) Approved Arrangements at export-certified abattoirs.

**Recommendation: That the committee recognises the substantial State and Federal regulatory frameworks and industry frameworks which the Victorian pig industry operates within.**

## **2. Pre-slaughter stunning: To understand the science behind the international recognition that CO<sub>2</sub> stunning is best practice.**

Stunning aims to intentionally cause unconsciousness and insensibility without pain and suffering. Animals must remain unconscious until death occurs through loss of blood, if not killed by the stunning method itself (EFSA, 2020). The impact of a stunning system should not be examined in isolation but include the differences of the components of the slaughter process that affect animal welfare.

In Australia, the Model Code of Practice for the Welfare of Animals – Livestock at Slaughtering Establishments, 2001 deems it acceptable for pigs to be stunned using controlled atmosphere carbon dioxide (CO<sub>2</sub>), and two other physical methods, mechanical (e.g., captive bolt) and electrical. However, the most used stunning methods for pigs in commercial abattoirs in Australia are CO<sub>2</sub> and electrical stunning.

The use of CO<sub>2</sub> is considered a humane and acceptable stunning method for pigs in Australia (Model Code of Practice for the Welfare of Animals: Livestock at Slaughtering Establishments, 2001). Furthermore, CO<sub>2</sub> stunning for pigs is the most used stunning method across the European Union, North America, Asia, and Canada, with rigorous scientific research underpinning all methods used (United States (NAMI, 2021), the European Union (Council Regulation (EC) Number 1099/2009) and by the World Organisation for Animal Health (OIE, 2005).

Australia's pork industry implemented CO<sub>2</sub> stunning based on research outcomes and consequent advice from experts. This led to a shift away from systems that routinely employ electrical stunning or captive bolt. Industry has continued funding research, which has led to a significant shift in the adoption of group wise loading systems and handling systems designed to reduce stress on the pigs.

Industry continues to look at ways to enhance pig welfare outcomes with research undertaken that looks at pre-stun handling to ensure effective stunning and minimise animal stress, particularly at end of life. ProHand™ abattoir is an important part of the process, providing free training which can be used to support understanding of how to handle pigs in a way that minimises stress.

Whilst significant research investment has been made to investigate alternatives, CO<sub>2</sub> stunning continues to be considered best practice globally.

**Recommendation: That the committee recognises CO<sub>2</sub> is still considered best practice globally for the pre-slaughter stunning of pigs.**

### **3. Voluntary phase-out: To understand the significant research, training and investment that industry made to implement the voluntary phase out of gestation stalls.**

In 2010, the Australian pork industry made a commitment to voluntarily phase out of the use of gestation stalls from use for a maximum of six weeks to a maximum of five days from last mating. The outcome of this voluntary phase out was a move to housing sows in group or loose housing during the gestation period.

Under the current Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> Edition) (MCOP), the use of a stall during gestation is allowed. A sow must not be confined in a stall for more than six weeks of any gestation period. This is also the law in Victoria.

In response to the Australian Pork Industry's voluntary phase out, the Australian Pork Industry Quality Assurance Program (APIQ✓<sup>®</sup>) developed and included an option (Option A) to verify that sows are kept in loose/group housing from at least five days after mating until one week before farrowing. Some members of industry have responded to additional customer and market specifications and have moved to using stalls for a maximum of 24 hours for mating only. APIQ✓<sup>®</sup> offers verification for this practice under Option B.

- 91% of our industry is APIQ✓<sup>®</sup> accredited.
- 88% of APIQ✓<sup>®</sup> accredited farms are certified, through an annual independent audit, as complying with Option A.
- This equates to 80% of the Australian commercial sow herd being certified as complying with Option A under APIQ✓<sup>®</sup>.

The remaining 20% of the industry are yet to be formally verified under APIQ✓<sup>®</sup> Option A. While we don't have formal data on non-APIQ✓<sup>®</sup> accredited farms, information collected through extension roadshows, producer phone calls and industry feedback indicates a range of reasons why they may not have sought formal accreditation for their status against the voluntary phase out. One being the small size of the farm and a decision not to invest in APIQ✓<sup>®</sup> accreditation.

**Recommendation: That the committee recognises the industry has successfully supported the wide adoption of group housing for sows.**

### **4. Pig housing: To understand the science and constant science-based evolution of pig housing and management.**

Pig housing needs to be considered within the context of the regulatory frameworks that can influence the design and building of pig farms. Local and State Government planning laws cover all aspects of the planning requirements including the placement of sheds, management and access conditions. The planning process is rigorous, and it can take years and hundreds of thousands of dollars for pig producers to successfully obtain development approval for new sheds or additional on-farm infrastructure.

Pig producers choose to use a range of housing designs and practices based on regularly reviewed and updated science. Different forms of confinement are recognised by veterinarians and other animal welfare experts as being crucial options to support the health and wellbeing of

both sows and piglets. Pig housing is designed to provide an environment where the pigs are safe, where protection from the elements can be provided, an appropriate environmental temperature can be maintained and pigs can have access to fresh food and water.

In Australia, pig housing is designed on the basis of protecting the pigs from environmental and biosecurity risks. This is considered an ethical imperative when raising pigs for the production of food. Australian production systems utilise a range of housing types from naturally ventilated sheds, automated climate-controlled side ventilated sheds, tunnel ventilated enclosed shed systems, free-range style outdoor piggeries, eco-shelters and straw based shedding systems. Pig housing also has to consider the size and behavioural characteristics of pigs and provide an environment that also takes the safety of the humans caring for the pigs into consideration.

**Recommendation: That the committee recognises that the industry utilises regularly reviewed and updated science, and the advice of experts, to make recommendations to producers to support them to determine the most appropriate housing and pig management practices for their chosen production system.**

**5. Australian best practice: To understand that international comparisons should be in context and may not be relevant to Australian farming conditions.**

The Australian pig industry is recognised as a global leader in pig welfare and whilst we are aware of the various nonregulated standards (recommendations for industries as they are not legislated) published by the multitude of various international pig industries, there is no one global 'best practice standard'. We must do our own due diligence and invest in Australian research to help ensure any recommendations for best practice in the Australian pig industry are backed by robust science and are fit for purpose in our unique operating environment.

The pig research community in Australia is recognised globally for its innovative approach to all aspects of pig production as well as the integrity of our research outcomes. We have some of the world's most celebrated and revered animal scientists undertaking globally relevant research for the Australian pig industry – and we are extremely proud of this fact.

The Australian pork industry considers 'Best Practice' to be outcome based rather than prescriptive. Australian pig producers are innovative and at times must operate within small margins, so if a desirable outcome can be met even if the operating environment differs between different businesses this is seen as a positive thing for our pigs and our producers.

The industry is also cognisant that there is a misconception some countries have implemented regulatory regimes purported by anti-livestock activists to be of "better practice than Australia". However, closer scrutiny of these regulations and their associated caveats do not necessarily demonstrate better animal welfare outcomes than those achieved (and verified through independent audits) on Australian farms.

**Recommendation: That the committee recognises the risks in comparing international farming and regulatory practices with appropriate best practice under Australian conditions.**

**6. Other issues: To understand and respect the vast majority of Victorians who wish to be able to continue to eat our high quality, locally produced and processed Victorian pork.**

The Australian pork industry is privileged to provide safe, nutritious protein to support the health and wellbeing of Australians. The industry operates under strict regulatory frameworks. Abattoirs are required to meet licensing and other regulations under state-based meat industry legislation that protects the safety and wholesomeness of meat and meat products.

The Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS4696:2023) covers the transport and production of meat and meat products regardless of whether they are for domestic consumption or export. The Australian Standard 4696 is given legal power under the Victorian *Meat Industry Act 1993* and supporting legislation.

Australia is a country of meat lovers and are proud to support and seek out Australian produce. APL conducts a nationally representative survey of 1,500 Australians on a quarterly basis, which reveals 60% of Australians prefer to buy Australian produce over imported, and when asked - over half agree with the standalone statements 'I love meat' and 'meat is important for nutrition'.

This love for meat is reflective in our survey of the Australian community, the vast majority (82%) of those surveyed are not following one of the main plant-based, reduced meat or non-meat diets (i.e. flexitarianism, veganism, vegetarianism and pescatarian). Of those surveyed, only 1% claimed to follow a vegan diet.

**Recommendation: That the committee recognises that pig and livestock farming is heavily regulated and the use of pigs as a livestock sector is an important contributor to a cost effective, nutritious diet which supports the health and wellbeing of Victorians.**

# Background on the pork industry

In 2021 APL launched its first-ever pork industry Sustainability Framework<sup>1</sup>. The Sustainability Framework set goals, targets, and measures to demonstrate the industry's commitments - animal welfare is central to everything in this document.

The Sustainability Framework is built around four priority pillars:

**Pigs** - A world leader in animal welfare and health.

**People** – Ethically produced, high welfare pork in a way that supports our industry's people and our local communities.

**Planet** - A world leader in environmental best practice.

**Prosperity** - A revolutionary contributor to Australia's economy and those who work within the sector.

These pillars and the Framework are further underpinned by APL's ambitious 2020-2025 Strategic Plan<sup>2</sup>. Our industry is proud of our achievements to date, particularly our leadership across sustainable agriculture, biosecurity, welfare, and innovation. Our Strategic Plan and Sustainability Framework set ambitious goals to deliver benefits for our producers and regional economies and communities.

## **Pigs: A world leader in animal care and health**

We have four focus areas under the pig pillar:

1. Pig health and biosecurity
2. Pig welfare and husbandry
3. Pig nutrition
4. Making the most of Australian genetics

Despite its relatively small size, the Australian pork industry prides itself on world leading animal welfare standards and biosecurity.

Care for our pigs is at the heart of everything the Australian pork industry does.

Over the last 10 years, APL has allocated direct project funds totalling \$23,653,793 to animal welfare related projects. In addition to the direct project funds, APL has incurred significant direct salary and corporate costs to evaluate, project manage and extend these projects and project outcomes. Of those direct project funds, 23% has been allocated to animal welfare specific projects and the remaining funds to projects which incorporate animal welfare outcomes to compliment the broader project objectives.

<sup>1</sup> [https://australianpork.com.au/sites/default/files/2022-03/APL%20Sustainability%20Framework\\_Web.pdf](https://australianpork.com.au/sites/default/files/2022-03/APL%20Sustainability%20Framework_Web.pdf)

<sup>2</sup> <https://australianpork.com.au/sites/default/files/2021-06/APL-Strategic-Plan-2020-2025.pdf>

APL currently has nineteen welfare related projects in progress, with a combined value of \$5,711,980. Project outcomes are expected to be incorporated in animal welfare outcomes which compliment broader project objectives of APL's research.

The aspects of animal welfare which APL's research incorporate are:

- Stress reduction
- Health
- Handling
- Pain management
- Enrichment
- Euthanasia
- Reduced confinement housing
- Survival
- Welfare indicators
- Animal behaviour

Additionally, during this time we have also invested significantly in the areas of biosecurity and emergency animal disease responsiveness. This is an area where the pork industry maintains a leadership position by demonstrating continued improvement in practice for the benefit of health and wellbeing of both pigs and the broader livestock industries. To date biosecurity projects worth \$3,756,744 are in addition to the \$23,653,793 welfare project investments.

Best practice pig farming relies on raising animals under high standards of hygiene, air quality, nutrition and management as well as raising animals in ways that reduce the use of antimicrobials.

Good biosecurity is a priority for raising healthy pigs. Biosecurity, the practice of preventing and controlling infectious diseases, is closely intertwined with animal welfare.

Good animal welfare practices directly help prevent diseases and maintain biosecurity. Adequate nutrition, clean housing, and proper management reduce stress in animals, and bolster their immune systems and resilience against diseases. Ethical treatment of pigs aligns with biosecurity by preventing disease transmission from pigs to humans (zoonoses), emphasising the critical importance of maintaining animal welfare standards. Biosecurity measures such as vaccination, quarantine and disease control, also directly affects pig welfare by safeguarding their health.

Thus, an interconnected approach that prioritises animal welfare is essential for effective biosecurity, ensuring the wellbeing of pigs and preventing disease outbreaks that could impact both pigs and human populations.

Providing treatment to sick pigs is essential for animal welfare. In some cases, the use of antimicrobials are crucial for alleviating suffering and controlling infections in sick pigs, thereby supporting animal welfare by providing essential medical care.

In Australia, the importance of antimicrobials is determined by the Australian Strategic and Technical Advisory Group on AMR (ASTAG). The use of third-generation cephalosporins can only be use in individual pigs when other antimicrobials does not work. The use of fluoroquinolones and colistin has never been permitted in food-producing animals in Australia. Good regulation and residue monitoring and the widespread use of biosecurity and vaccination—Australia's levels

of AMR, particularly within domestic animal populations, are relatively low. The low levels of fluoroquinolone resistance in the Australian human population compared to other countries could also be a result of the well-regulated use of this class of antibiotics in people and domestic animals in Australia since the early 1990s.

The pork industry is the first industry to have developed antimicrobial prescribing guidelines for veterinarians.

Prescribing guidelines significantly aid veterinarians in their prescribing decisions, maintaining the balance between animal welfare and antimicrobial stewardship. These guidelines ensure the judicious use of antimicrobials, which includes prescribing them only when necessary, at the right dosage, and for the appropriate duration. By following these guidelines, pigs are treated effectively while minimising the risk of antimicrobial resistance and preserving animal welfare, ensuring antimicrobials are used responsibly for the benefit of both pigs and public health.

APL also encourages the Committee to undertake Our Virtual Tour, an interactive experience that explores locations throughout the pork supply chain. It includes two of the types of pig farming systems - indoor and free range; an abattoir and a supermarket.

The Virtual Tour, a link to which can be found at Appendix A, showcases the animal welfare, technology, sustainability, and food safety and quality measures that go into producing pork.

The Virtual Tour provides transparent information about the practices used to care for the animals along the entire supply chain while recognising that pigs become a nutritious and affordable source of protein for Victorian families.

To protect our industry from the impact of animal diseases, the entire Australian pork supply chain maintains robust hygiene and biosecurity practices. Currently, 91% of sows and their progeny are on farms certified as Australian Pork Industry Quality Assurance Scheme (APIQ<sup>√</sup><sup>®</sup>) accredited. APIQ<sup>√</sup><sup>®</sup> conducts compulsory annual audits and the industry-focussed approach has helped lift the profile of the pork industry.

APIQ<sup>√</sup><sup>®</sup> is an industry program for on-farm quality assurance, it supports producers to assure their customers they can produce a safe, quality and ethically produced product.

APL manages the program on the industry's behalf through APIQ Management (APIQM). A wide range of stakeholders have provided technical and policy input to the program, including producers, scientists, quality assurance and audit experts, retailers and customer organisations, government and supply chain members.

APIQ<sup>√</sup><sup>®</sup> covers 7 core modules (Management Standards, Food Safety Standards, Animal Welfare Standards, Biosecurity Standards, Traceability Standards, Environmental Standards, Transport Standards) and 3 optional standards (Gestation Stall Free, Customer Specifications for Supply to Coles Supermarkets and Voluntary Enhanced Biosecurity Standards for African Swine Fever).

The industry is also working to further improve biosecurity and pig health, including investing in new diagnostics, new vaccines (such as for Japanese Encephalitis Virus) and progressing antimicrobial stewardship. We will continue to invest in world class research to improve the welfare of pigs, with projects investigating nutrition, enrichment and husbandry practices to improve outcomes for both sows and their progeny.



## People: Capability

The Sustainability Framework's People Pillar reflects the industry's ongoing commitment to raise pigs and produce pork - a nutritious, affordable protein - in ways that support our industry's people and our local communities.

Key focus areas under this Pillar include food safety and quality, human nutrition and cooking with pork, rural communities and employment and work, health and safety. Animal care and welfare is again central to this industry sustainability Pillar.

Approximately 34,600 full time equivalent jobs are supported by the industry nationally, predominantly in regional Australia, underpinning economic and social prosperity of communities and the wellbeing of individuals. The industry's workforce is skilled, specialised and generally engaged on a permanent basis.

There continues to be ongoing investment and focus in the industry on upskilling, and developing and delivering training to meet current and future demand and capability needs.

Ensuring a level of formal and/or closely supervised, quality on the job training is ingrained in the industry, reflecting the Victorian Pig Welfare Standards and Guidelines and acknowledgement of the importance of skilled stock people to pig welfare.

A rich depth and breadth of animal husbandry knowledge and skill exists within the industry and support services. This continues to be developed via industry research and development and through under-graduate and post-graduate animal science, agriculture and veterinarian university qualifications. This is complemented by accredited training, which includes the Certificate III<sup>3</sup> and IV in Pork Production, Pork Industry Stockperson Skillset<sup>4</sup> and VET qualifications in Agriculture delivered by a number of Registered Training Organisations (RTOs) nationally. These courses are conducted by highly qualified and specialised trainers (including veterinarians), using contextualised content based on the latest research. Enrolment and completions of the Certificate III in Pork Production have risen over the last five years<sup>5</sup>. Training includes essential units of competency for pig care, welfare and safe handling.

Additional, on-farm training occurs on an ongoing basis which also reinforces pig care and welfare best practice. Producers draw on industry research and development and APL extension and training (including ProHand™), to support their workplace structured training.

A continued focus on workforce development is important, as labour and skills shortages can hinder the industry's ability to innovate. Allied professions including veterinarians, veterinary medicine suppliers, nutritionists, agronomists and other technicians are essential to maintaining high standards of management and pig welfare. Shortages of these skills have a flow on effect for the industry and its ability to provide pork as a regular protein source for Australians.

Like many rural industries, the pork industry is impacted by staff shortages. The industry can and is able to support more than 36,000 jobs nationwide and has the opportunity for growth up to 38,000, as Australian pork replaces imported pork in the domestic production of smallgoods.

<sup>3</sup> <https://training.gov.au/Training/Details/AHC30422>

<sup>4</sup> <https://training.gov.au/Training/Details/AHCSS00151>

<sup>5</sup> National Centre for Vocational Education Research, 2023

The pork industry has a lot to celebrate in how it is innovating to attract and retain its people.

As reflected in the 2021 ABS Census and APL's 2022 Producer Survey, Aboriginal or Torres Strait islander peoples, younger and older people, women, people with disabilities and people from a range of cultural backgrounds are represented in the on-farm pig industry workforce.

APL and individual businesses continue to proactively deliver high-quality education and workforce development programs. Those that APL and the industry support include:

- Nationally accredited training in pork production and meat processing, APL's online learning platform and ProHand™ (ProHand) training course<sup>6</sup>. Prohand was developed by the Animal Welfare Science Centre and aims to improve animal welfare and minimise handling stress.
- School and universities engagement, industry scholarships and placements and post graduate scholarships for PhD and Masters students.
- Leadership programs supporting the development of emerging leaders.
- Active participation in the Primary Industries Education Foundation of Australia.
- APL's Virtual Tour.
- APL's Career Portal.<sup>7</sup>
- Individual businesses provide graduate and leadership programs, traineeships, apprenticeships, gap year programs and flexible work options.
- Businesses support diverse and inclusive workplaces via a number of initiatives, e.g. the Autism and Agriculture program, an initiative of SunPork Farms and the Autism CRC<sup>8</sup>.

### **People: Provider of nutritious affordable protein**

Household use of pork has maintained its market share with an average consumption of around 10.8 kg per person per capita of fresh Australian pork. Campaigns such as 'get some pork on your fork' and 'bring sustainable on the table' have successfully raised consumer awareness and demand about the versatility and value for money pork offers as a protein source within a healthy diet.

Australia is a country of meat lovers and are proud to support and seek out Australian produce. APL conducts a nationally representative survey of 1,500 Australians on a quarterly basis, which reveals 60% of Australians prefer to buy Australian produce over imported, and when asked - over half agree with the standalone statements 'I love meat' and 'meat is important for nutrition'.

This love for meat is reflective in our survey of the Australian community, with the vast majority (82%) of those surveyed not following any of the reduced meat, non-meat diets or plant based diets (i.e. flexitarianism, veganism, vegetarianism and pescatarian). Of those surveyed, only 1% claimed to follow a vegan diet.

<sup>6</sup> <https://www.australianpork.com.au/training-and-development/online-training>

<sup>7</sup> <https://australianpork.com.au/career-pathways>

<sup>8</sup> <https://sunporkfreshfoods.com.au/autism-and-agriculture/> and project report: <https://www.autismcrc.com.au/our-programs/adulthood/autism-and-agriculture>

When asked about the Australian pork industry, 70% of Australians surveyed have heard positive things about our contribution to the Australian economy, and 42% have heard positive things about our impact on people and rural communities. In addition to this more than half of Australians agree that our industry makes a valuable contribution to Australian food security.

### **Planet:**

In the planet pillar we have three focus areas:

1. Carbon cycling and nutrient accounting
2. Farm biodiversity and natural resource stewardship
3. Closing the loop to reduce waste

In the carbon space, pork is already a low emissions protein. Our 2020 Life Cycle Assessment results confirmed the industry achieved 3.3kg of greenhouse gas emission per kilo of liveweight produced. The industry is making further gains through strong investment in decarbonisation such as through renewable energy technologies and better use of waste.

Agriculture must be provided with opportunities to demonstrate the contribution agriculture can make to meeting climate change targets. The pork industry has been actively mitigating climate change risks for decades. Climate change is expected to impact the pork industry in a number of ways:

- Increased biosecurity threats: Animal health experts are predicting that increased temperatures due to climate change, combined with biodiversity and species migratory changes, will lead to an increased risk of zoonotic diseases. The pork industry has responded to a range of animal disease threats (Swine influenza 2009, Japanese encephalitis virus [JEV] 2022) while keeping a watchful eye on the potential threats from near neighbouring countries (Foot and mouth disease [FMD] and African swine fever [ASF]).
- Availability of stock feed: The grains industry will be particularly susceptible to the impacts of climate change. The quality and quantity of Australian grain produced and available as stock feed is expected to be impacted by:
  - Changes to the length of growing seasons impacting the varieties able to be successfully grown,
  - Erratic weather impacting the sowing or harvest periods,
  - Weather damage reducing the quality of the grain,
  - Greater potential for flood or heavy rainfall events to cause soil and crop damage, and
  - Increased frequency of droughts or below average rainfall.

### **Prosperity:**

Pig care is not only the right thing to do, it is good business. It is just another reason why Australia's pork industry has such a focus on animal welfare through the value chain, delivering economic as well as welfare and social benefits.

The prosperity pillar we have four focus areas:

1. Reduced cost of production and profitable through-chain

2. Value for money
3. Diversified markets
4. Innovative farming

While not always the main focus of our research and development projects, prosperity is vital to the implementation of research and development on farm. Making sure the industry is financially sustainable supports producers to invest in all aspects of their farms.

Profitability is recognised internationally as a core component of a successful sustainability framework. Producers must be able to remain financially viable in order to make the investments in enhanced animal welfare, biosecurity and environmental management, profitability is key for sustainability success. Prosperity is therefore considered as part of our industry sustainability framework. A prosperous, thriving industry is able to advance, innovate and support the many small local businesses in regional and rural areas so vital to the local economies.

The Australian pork industry is recognised for its high standards and 10% of our export products heads to premium markets such as Singapore, Hong Kong and Vietnam. The industry's independently audited biosecurity, animal welfare and environmental standards support our ability to consistently supply products to these important international markets. While only a small proportion of our pork is exported, the exports markets are a vital component of our supply chain.

# APL response to the Terms of Reference

Within these chapters is the detailed response to the terms of reference.

## 1 Regulatory Environment

### **Term of reference One: The scope, application, compliance with and enforcement of relevant existing regulatory frameworks and their ability to promote pig welfare outcomes.**

Note: Best practice Regulatory Frameworks are those written to be outcomes-based standards able to be incorporated into a regulatory regime. Best practice agricultural regulation is recognised as flexible, practical and fit for purpose with outcomes focused frameworks. This creates an environment supportive of investment in research, development and extension to in turn support on-farm adoption of ever evolving best practice.

- The Victorian pork industry complies with Federal, State and Local Government regulatory frameworks as well as a broad range of industry and market requirements.
- These frameworks are aimed at promoting best practice pig welfare while also considering biosecurity, staff workplace health and safety and environmental management requirements.
- In addition to animal welfare inspectors, the industry complies with the enforcement regimes required under a range of voluntary industry best practice codes.

Pig production in Australia is regulated by Local, State and Federal laws. These legislative requirements are complemented by industry standards and the adoption of science based best practice. Many of the Australian voluntary industry standards have been incorporated as modules and are independently audited annually through APIQ✓<sup>®</sup> which currently covers 91% of commercial sows.

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

Pig welfare cannot be considered in isolation from biosecurity, environmental, human health and safety requirements. A holistic approach is needed to ensure the health and welfare of the pigs and therefore the pork supply chain, an important part to supply nutritious food to Victorian families.

Our producers are proudly committed to ensuring the highest welfare for the pigs within their care. To support this, Australian Pork Limited (APL) and the pork industry have and continues to invest in projects that support animal welfare. Projects which:

- Inform new technologies and practices to improve pig health and welfare,

- Form the basis of education and training of our stock-people to improve pig handling, care, health and welfare,
- Inform the recognition of an ever evolving and improving industry best practice, and ultimately
- Are used to improve the science that underpins regulated minimum standards.

The regulated science-based animal welfare minimum requirements for pigs are defined in the Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP), a critical tool for ensuring nationally harmonised welfare regulation.

This document has been slated for review and replacement by the Australian Animal Welfare Standards and Guidelines: Pigs (Pig S&Gs). In preparation for a formal review process to commence, the industry has invested in research, development, extension and staff training.

The Australian pork industry audits the standards within the MCOP through the pig industry's voluntary Quality Assurance Program, APIQ<sup>✓</sup><sup>®</sup>, which currently covers 91% of commercial sows. To maintain their APIQ<sup>✓</sup><sup>®</sup> certification producers are audited annually by independent auditors and any breach of MCOP is considered a Critical Corrective Action Required (CAR) which necessitates immediate corrective action and potential loss of accreditation.

## **1.1 Regulatory Frameworks - background**

The current regulatory environment for the pork industry covers every aspect of the supply chain from farm design, production, transport to plate. The industry is highly regulated with numerous checks and balances in place to ensure all aspects of the industry meets high standards. In addition to animal welfare, this encapsulates legislation relating to biosecurity, workplace safety and planning and the environment.

In addition to the compliance and enforcement regime undertaken by State and Federal Government, the Victorian pork industry has implemented voluntary industry standards to support its strategic goal of being a leader in the care and welfare of pigs.

The below section presents an overview of key regulations from paddock to plate.

## **1.2 On Farm**

There is a significant number of local, State and Federal Government laws, codes and guidelines as well as industry standards and considerations which impact every decision a pig producer is able to make on-farm. From the initial planning and design of the farm through to the day-to-day management of staff, pig production requires a highly skilled team.

### **1.2.1 Planning**

Local and State Government planning laws cover all aspects of the planning requirements including the placement of sheds, management and access conditions. The planning process is rigorous, and it can take years and hundreds of thousands of dollars to successfully obtain development approval for new sheds or additional on-farm infrastructure.

The industry, through their levy funds, has invested in the development of the National Environmental Guidelines for Indoor Piggeries (NEGIP) and the National Environmental Guidelines for Rotational Outdoor Piggeries (NEGROP) to provide science-based assistance in the planning of piggeries.

### 1.2.2 Veterinary laws

Victorian Government Acts and Regulations which relate to veterinary practice include, but are not limited to, the *Veterinary Practice Act 1997*, *Veterinary Practice Regulations 2018*, *Agricultural and Veterinary Chemical (Control of Use) Act 1992* and *Agricultural and Veterinary Chemicals (Control of Use) Regulations 2017*.

### 1.2.3 Animal welfare and management

In addition to veterinary laws there are animal welfare regulations.

State and Territory governments are generally responsible for animal production and welfare laws and their enforcement. The States and Territories set and enforce animal welfare standards through administration of legislation for animal welfare and the prevention of animal cruelty. These laws cover all aspects of animal husbandry, transport, and abattoir operations that occur within their respective jurisdictions.

Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP) sets out the minimum standards of care required for the welfare of pigs. Standards within the MCOP are given legal power when implemented into State and Territory welfare legislation.

In Victoria the MCOP has been adopted in full as the Victorian Standards and Guidelines for the Welfare of Pigs (Pig Welfare Standards). The current enabling legislation is the:

- *Livestock Management Act 2010* and *Livestock Management Regulations 2021*

With provisions within the:

- *Prevention of Cruelty to Animals Act 1986* and *Prevention of Cruelty to Animals Regulations 2019*

### 1.2.4 The Model Code of Practice for the Welfare of Animals: Pigs

Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP) is intended as a guide for all people responsible for the welfare of pigs under intensive, deep litter and outdoor systems. The MCOP is written in language which facilitates both producer and regulatory clarity and is designed as a minimum standard able to be implemented nationally within legislative frameworks while recognising the need for flexibility to support the use of slightly different production systems in different regions of Australia.

The MCOP recognises that the basic requirement for the welfare of pigs is a husbandry system, managed by trained and skilled stock-people to meet the basic needs of pigs, which are:

- readily accessible, appropriate and sufficient food and water,
- adequate shelter to protect them from climatic extremes,
- opportunity to display appropriate patterns of behaviour,
- physical handling in a manner that minimises the likelihood of unreasonable or unnecessary pain or distress,
- protection from or rapid diagnosis and correct treatment of injury or disease,
- freedom for necessary movement, including to stand, stretch, and lie down, and

- visual and social contact with other pigs.

The MCOP was based on the knowledge and technology available at the time of publication and was designed to be updated as knowledge and technology evolved. Whilst it outlines important aspects to be considered in ensuring the welfare of pigs, the need for experience and competency in the care of pigs is also emphasised.

The standards in the MCOP form the basis for an assessment of compliance with good welfare. They may be used as a reference for auditors and inspectors who are trained and competent to examine and judge the welfare of pigs. Information provided under the headings of 'Recommended Practice' and 'Guidelines' is advisory only.

## **1.3 Workplace safety considerations**

### **1.3.1 Overarching workplace health and safety legislation**

It is a fundamental priority as well as a legal obligation for employers and employees to ensure a safe workplace. This is a primary consideration whilst implementing animal welfare requirements and regulatory frameworks.

Workplace health and safety regulations in Australia require employers to ensure a safe workplace and eliminate risks to health so far as is reasonably practicable. Under the *Occupational Health and Safety Act 2004* and accompanying Regulations and Codes of Practice in Victoria, employers (or persons conducting a business or undertaking) have a duty to manage safety overall and animal handling risks. Both employees and management need to continuously work together to uphold safety standards and reduce risks from hazards.

Businesses involved in raising pigs must ensure:

- They provide a safe working environment without risks to the health of employees.
- Activities don't expose anyone to safety risks, including visitors and contractors.
- People can enter and leave the premises safely, and without risk to their health.

This requires that:

- The work area is designed to allow animals to be handled safely.
- The condition of the workplace is free of risks to health and safety.
- Safe plant is provided and maintained, along with safe systems of work.
- Safe use, handling, storage or transport of plant or substances is ensured.
- Suitable facilities for the welfare of employees at any workplaces are provided.
- Employees have the necessary information, instruction, training or supervision to enable them to do their work in a way that is safe and without risks.

These requirements are taken seriously in the industry and are a key consideration in all decision-making and day-to-day operations.

Employees must also take reasonable care for their health and safety in the workplace as well as that of others who may be affected by what they do or don't do. In addition, they must not intentionally or recklessly interfere with or misuse anything at the workplace (WorkSafe Victoria).



### 1.3.2 The MCOP and Pig Welfare Standards

Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP) and Victorian Pig Welfare Standards reinforce the need to ensure operator safety along with animal welfare needs e.g. in relation to housing (which “should meet animal welfare, environmental and operator health and safety requirements”<sup>9</sup>) and use of husbandry procedures to ensure procedures can be done safely, cleanly and quickly<sup>10</sup>.

The MCOP requires that pigs be cared for personnel who are skilled in pig husbandry and competent to maintain the health and welfare of the animals in accordance with the standards, or are under direct supervision of such personnel<sup>11</sup>. In Victoria, as per the Pig Welfare Standards, this means a person who is a veterinary practitioner, or who holds minimum relevant qualifications or equivalent, or has worked for at least 12 months caring for pigs in a commercial pig establishment and can demonstrate competency in key skillsets<sup>12</sup>.

A core unit of competency in specified qualifications is “contribute to workplace health and safety processes.”

In summary, the vital role of the stockperson, their interactions with pigs and ability to undertake their job safely whilst ensuring animal welfare has long been - and remains - a core focus of all producers, APL and key industry stakeholders. This is reflected in:

1. MCOP and Companion Handbook to the Model Code of Practice for the Welfare of Pigs<sup>13</sup>.
2. Victorian Pig Welfare Standards and Guidelines.
3. APIQ✓<sup>®</sup>, which highlights personal safety risk management considerations as part of ensuring animal welfare.
4. Industry training both nationally accredited and non-accredited, including ProHand.
5. Training materials and resources provided by APL to industry, based on research.
6. The policies and operating procedures of individual businesses.
7. Ongoing research by industry and individual businesses to underpin continuous improvement in training.

Accredited training includes the Certificate III<sup>14</sup> and IV in Pork Production, Pork Industry Stockperson Skillset<sup>15</sup> and VET qualifications in Agriculture delivered by Registered Training Organisations (RTOs) nationally. Courses are conducted by highly qualified and specialised trainers (including veterinarians), using contextualised content based on the latest research. Enrolment and completions of the Certificate III in Pork Production have risen over the last five years<sup>16</sup>. Training includes essential units of competency for pig care, welfare and safe handling.

ProHand™ (ProHand) online training was developed by the Animal Welfare Science Centre at the University of Melbourne with funding from APL and Australian Meat Processor Corporation. Its development involved leading animal welfare experts including Professor Paul Hemsworth and Jeremy Skuse and psychologist Professor Grahame Coleman. Dr Temple Grandin was also

<sup>9</sup> Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> Edition), Section 4 Accommodation.

<sup>10</sup> Companion Handbook to the Model Code of Practice for the Welfare of Pigs (3<sup>rd</sup> ed.) Section 5 Husbandry.

<sup>11</sup> Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> Edition), Section 2 Competence of the stock-person

<sup>12</sup> Victorian Pig Welfare Standards, Section 1 Definitions and Section 2 Competence of the stock-person

<sup>13</sup> <https://www.australianpork.com.au/sites/default/files/2021-07/Companion-to-the-Model-Code.pdf>

<sup>14</sup> <https://training.gov.au/Training/Details/AHC30422>

<sup>15</sup> <https://training.gov.au/Training/Details/AHCSS00151>

<sup>16</sup> National Centre for Vocational Education Research, 2023

integral in the endorsement of ProHand. It aims to improve animal welfare and minimise handling stress and is offered as “ProHand Pigs” (on-farm) and “ProHand Abattoir”. Planning for development of ProHand for transporters underway.

People are essential to ensuring good pig welfare, and they must be able to interact with pigs and perform work functions safely, effectively and efficiently.

Those working with pigs must understand pig behaviours and the risks involved in pig handling, in order to keep themselves and others safe given pigs can cause injury if not handled properly.

A highly developed understanding of pig behaviour and pig-human interactions exists within the industry, underpinned by extensive and ongoing research, much of which has involved the Animal Welfare Science Centre at the University of Melbourne.

Improvements in pig welfare will continue to (increasingly) require a strong focus on trained and skilled personnel and management to uphold people safety and animal welfare needs.

## 1.4 Transport

The *Australian Animal Welfare Standards and Guidelines — Land Transport of Livestock* (Land Transport Standards) cover the process of land transport of livestock by road, rail and vehicle onboard a ship, and commences at the time that animals are first deprived of feed and water before loading, to the time that livestock have access to water after the journey (destination). It includes:

- mustering and assembly,
- handling and waiting periods before loading,
- loading, journey duration, travel conditions, spelling periods,
- unloading and holding time.

The Land Transport Standards are regulated by State and Territory governments via animal welfare legislation. They apply to all people responsible for the care and management of livestock that are transported throughout the entire process including agents, transport operators and people on farms, at depots, sale yards, feedlots and processing plants. There is a chain of responsibility for the welfare of livestock that begins with the owner or their agent and extends to the final receiver of the livestock.

Livestock must be assessed as fit for the intended journey at every loading and the consignor must only supply livestock that have been assessed as fit for the intended journey.

APL developed a national guideline and training package (“Is it fit for the intended journey” or known in industry as “Fit to load”) to help pig producers and transporters meet the *Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock*, and to determine whether an animal is fit to be loaded for transport and for the entire journey by road, to any destination within Australia.

Key transporter enterprises are represented as part of APL’s extension and capability programs and are engaged in communication of best practice to the transport industry, and work alongside producers to ensure best animal welfare outcomes.

“TruckSafe Animal Welfare”, (formally TruckCare), is an audited quality assurance program for livestock transport. It covers animal welfare, food safety and traceability. It is fully auditable and is built around the quality assurance principles contained in international standards and also uses hazard analysis of critical control points.

In addition, the Australian Livestock and Rural Transport Association (ALRTA) maintain a National Animal Welfare Policy.

## 1.5 Regulatory Frameworks for abattoirs

### 1.5.1 Domestic abattoir regulation

State and Territory governments are responsible for animal production and welfare laws and their enforcement. The States and Territories set and enforce animal welfare standards through administration of legislation for animal welfare and the prevention of animal cruelty. These laws cover all aspects of animal husbandry, transport and abattoir operations that occur within their respective jurisdictions.

Abattoirs are required to meet licensing and other regulations under state-based meat industry legislation that protects the safety and wholesomeness of meat and meat products.

The Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS4696) covers the transport and production of meat and meat products regardless of whether they are for domestic consumption or export. The Australian Standard 4696 is given legal power under the Victorian *Meat Industry Act 1993* and supporting legislation.

- The Australian Standard 4696 includes statements recognising elements of the slaughter of animals such as *"animals are slaughtered in a way that prevents unnecessary injury, pain and suffering to them and causes the least practicable disturbance."*
- The Model Code of Practice for the Welfare of Animals Livestock in Slaughtering Establishments (2001) is intended as a standard to all people including truck drivers, stock-people, slaughtering staff, inspectors, veterinarians and abattoir management and the employees involved in the management of animals of various species at slaughtering establishments (abattoirs, slaughterhouses, and knackeries). It includes aspects of unloading, pre-slaughter handling and the slaughter process. It aims to encourage the efficient, considerate treatment of animals so that stress is minimised. It includes a section about emergency slaughter of sick, crippled and 'downer' animals. Techniques for the humane destruction of animals are also described in the Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP). The Animal Welfare Standards and Guidelines for Livestock at Processing Facilities and Establishments is currently under development and will supersede the Model Code of Practice for the Welfare of Animals Livestock in Slaughtering Establishments (2001).
- The Industry Animal Welfare Standards – Livestock Processing Establishments Preparing Meat for Human Consumption is a voluntary industry standard that covers the welfare of animals from receipt to slaughter. It provides an approach to animal welfare at slaughtering establishments and helps industry demonstrate compliant animal welfare outcomes.

## 1.5.2 Export-certified abattoir regulation

Export-certified abattoirs must meet the same regulations as domestic abattoirs (as set out above), however they must also meet additional regulations, such as:

- The Australian government regulates the operations at export registered abattoirs, under the *Export Control Act 2020* (the Act), and the Export Control (Meat and Meat Products) Rules 2021 (the Rules).
- Compliance with the regulations is ensured by the Department of Agriculture Fisheries and Forestry through their Approved Arrangements, which are audited and, where necessary, requires corrective actions to be undertaken, including action to vary, suspend or revoke the operations of meat export establishments.
- The department verifies compliance with these requirements on export establishments is through on-plant veterinarians (OPV).
- OPVs are appointed as authorised officers under the Act and are also Australian Public Service employees. OPVs conduct daily ante-mortem inspections whereby animals are physically examined for suitability for slaughter for human consumption and verify the welfare of the animals on arrival and/or through processing.

## 1.6 Australian Pig Industry Quality Assurance (APIQ√®) and annual audits

APIQ√® is the most widely adopted quality assurance (QA) program for pig producers in Australia, with 91% of Australian production voluntarily adopting the program nationally.

### 1.6.1 What is APIQ√® certified pork?

APIQ√® certification provides customers with assurance that high standards are in place. This applies to on-farm management, food safety, animal welfare, biosecurity, and traceability. This enables producers to deliver pigs of consistent quality and open the door to domestic and export markets. Through APIQ√®, the pork industry also provides assurance to major retailers of the welfare standards met by producers.

APIQ√® Management within APL handle the administration activities of the APIQ√® program. The APIQ√® Standards are outcome-focused and supported by performance indicators, with annual independent certification providing assurance that high standards are in place.

APIQ√® standards are reviewed regularly by a range of industry, quality assurance and auditing experts and government stakeholders to ensure the program is able to meet their expectations. Having one program so widely adopted across the industry helps to avoid the costs and inconsistency that would be caused by different markets requiring different quality assurance programs. For example, APIQ√® offers the opportunity to be certified against Customer Specifications Coles (Option B) verification within the same audit process.

- APL has worked with Coles to research appropriate information and extension materials and create resources to support implementation of Option B requirements by producers.
- These resources are available to all pig producers.

On-farm compliance set in the APIQ<sup>√</sup>® Standards is verified through an independent third-party auditor. This ensures the credibility of the APIQ<sup>√</sup>® program. AUS-MEAT Ltd is the contracted third-party auditing organisation who conducts independent third-party annual compliance audits of all certified producers.

### **1.6.2 Certification Policy 10 of APIQ<sup>√</sup>®**

APIQ<sup>√</sup>® is subject to ongoing review of the quality of its policies, processes, and operations and seeks to achieve continuous improvements. The following activities are routinely completed.

**a. Systems Audit:** An independent Certifying Body (CB) is engaged annually to evaluate the policies, strategies, and processes of the system against the objectives of the system itself.

- The CB will conduct an annual review of changes made to the system.

**b. Witness Audit:**

- If audit scheduling and management is contracted to a Third Party Audit Organisation (TPAO) the TPAO will be required to implement a program for the calibration and training of auditors that is acceptable to APIQM.
- Annual witness audits of each auditor must be included in the TPAO's auditor improvement program.
- Outcomes of individual witness audits must be available to APIQM.
- The TPAO provides a summary of training and witness audit outcomes to the Reference Group annually.

**c. Annual Review:**

- APIQM conducts a minor and general review of APIQ<sup>√</sup>® Standards policies and manuals each year to address feedback received and any program issues raised by auditors, producers, and other stakeholders.
- Any changes to customer specification modules must be agreed and approved in consultation with the specific customer who is the partner to the module.
- Where required, legal advice is sought for relevance and applicability.
- The TPAO will be advised in writing of amendments to Standards, Performance Indicators and Policies at a time agreed in consultation with APIQM.

**d. Major Review:**

- APIQM, assisted by a working group, conducts a major review of Standards, policies and manuals approximately every four (4) years.
- Customers with specification modules included in APIQ<sup>√</sup>® will be included in working groups.
- Where required, legal advice is sought for relevance and applicability.

**e. Reporting:**

- The CB, through APL, will report annually to the APL Industry Integrity Committee on both the system and witness audits.
- The Executive Summaries are presented to the Panel for their information.

**f. Approval of Amendments:**

- Any revisions and amendments made that change the intent of Policies and/or Standards must be endorsed by the APL Industry Integrity Committee and approved by the APL Board prior to publication.

**1.6.3 Independent audits**

APL contracts AUS-MEAT Ltd to conduct all external compliance audits for the industry. AUS-MEAT Ltd is an independent Third-Party Audit Organisation (TPAO).

Piggeries seeking or maintaining APIQ<sup>✓</sup><sup>®</sup> certification must successfully pass an external annual compliance audit. A total of 344 APIQ<sup>✓</sup><sup>®</sup> annual compliance audits were conducted between 1<sup>st</sup> May 2022 and 30<sup>th</sup> April 2023.

Auditors must be independent of the organisation being audited. Specifically, this requires that:

- The auditor has not been responsible for the creation, development or implementation of the on-farm QA system in any way, including facilitation.
- The auditor does not have an ongoing role in the day-to-day management or hold an advisory role in the farm's operation.
- The auditor is not related to the producer; and
- The auditor does not have a business or financial interest in the ownership, management, or operation of the business.

An auditor cannot be assigned to audit a site for more than three consecutive years. Every fourth year a different auditor must audit the site; in the fifth year, the previous auditor may be assigned to undertake the site audit with future audits meeting the rotation policy.

The TPAO is required to ensure all auditors are suitably qualified, trained and capable of conducting APIQ<sup>✓</sup><sup>®</sup> audits.

Suitably qualified auditors are considered to possess the following skills, training and qualifications:

- Trained auditor and preferably a lead auditor qualification.
- Approved by Exemplar Global as a Food Safety Auditor or equivalent.
- Livestock experience, preferably in the pig industry.
- Desirable but not required would be other form of professional training in related fields i.e.: Degree, Diploma, Certificates in Agriculture or Animal Husbandry or any equivalent.
- Further supporting training if available i.e.: Hazard Analysis Critical Control Point (HACCP), Voluntary Incidental Trace Allergen Labelling (VITAL), microbiology, etc.
- Attended formal APIQ<sup>✓</sup><sup>®</sup> training.

The performance of AUS-MEAT against the Service Agreement is formally reviewed twice yearly by the Third-Party Audit Organisation Reference Group (TPAORG). Any complaints received by APIQ<sup>✓</sup><sup>®</sup> Management or AUS-MEAT are managed in accordance with APIQ<sup>✓</sup><sup>®</sup> Certification Policies as they are received.

## 2 Pre-slaughter stunning

**Terms of Reference Two: The ability of the most common methods used to stun pigs before slaughter (including electrical stunning and the use of carbon dioxide gas) in Victorian abattoirs to minimise pain, suffering and distress and prevent injury, and available alternatives.**

Note: The pork industry uses the term livestock processing facilities or abattoir, as referenced in regulations and standards. Pre-slaughter stunning is recognised as a humane inclusion in the process of killing an animal for the purpose of producing food.

### 2.1 Function of stunning

Stunning aims to intentionally cause unconsciousness and insensibility without pain and suffering. Animals must remain unconscious until death occurs through loss of blood, if not killed by the stunning method itself (EFSA, 2020). The impact of a stunning system should not be examined in isolation but include the differences of the components of the slaughter process that affect animal welfare.

It is a legal requirement in many countries to stun animals prior to slaughter and remain unconscious until death (EFSA, 2020; Model Code of Practice for the Welfare of Animals: Livestock at Slaughtering Establishments, 2001). While stunning renders an animal unconscious, it may or may not kill an animal outright, depending on the method of stunning used. Some methods may only induce unconsciousness for a short time before the animal fully recovers, while others may result in a long duration of unconsciousness or even death in some or all animals.

Regardless of the stunning method, stunning is followed by sticking (bleeding) to ensure death prior to the slaughter process and to ensure blood loss to maximise meat quality and must be residual free so it is suitable for human consumption. While animal welfare is of utmost importance, the safety of the human operators and economics and environmental impacts also need to be considered (Steiner et al., 2019).

### 2.2 Current practice and animal handling

Positive handling experience has also been found to provide benefits in terms of ease of handling and meat quality (Geverink et al., 1998, Hambrecht et al., 2005). Consequently, stock people behaviours impact both the immediate behaviour of the animal, as well as the subsequent behavioural responses of the animal to humans. Thus, understanding the animal's behavioural characteristics and sensory and cognitive capabilities is important for effective handling, as well as ensuring high animal welfare and productivity in all stages of livestock production. Optimisation of lairage and slaughter conditions (particularly facility layout, ambient control and handling) is important in order to allow pigs to recover from the stress of handling and transport and to ensure optimal and uniform carcass and meat quality (Faucitano & Velarde, 2021).

The Australian pork industry continues to invest in research and development to enhance the welfare and care of our pigs. This includes the design of modern infrastructures and low-stress animal handling systems. Our research has driven continuous improvement and significant investment across the industry, with 85% of Australia's commercial pig production being processed in export-certified abattoirs that have adopted world-leading infrastructures enhanced by the application of leading animal handling techniques and supervised by independently employed on-site veterinarians.

The industry will continue to use methods that are backed by peer-reviewed, Australian and global scientific research into animal welfare ensuring the humane outcomes for our animals during processing. APL is committed to supporting our industry by prioritising continuous improvement in animal welfare of pigs under our care. ProHand™ (ProHand) was developed in recognition of the vital role stock-people have in the overall productivity, welfare and health of the pigs in their care and control. The free, online training program specifically targets those key attitudes and behaviours of livestock handlers that have been shown to have a direct impact on pigs.

### **2.2.1 ProHand**

ProHand™ (ProHand) was developed by the Animal Welfare Science Centre at The University of Melbourne with funding from the APL and Australian Meat Processor Corporation. ProHand is a world-leading, proven training program designed and tested on stock-people at commercial farms around the world. It builds on extensive scientific research regarding factors that affect the productivity and welfare of farm animals. Its development involved leading animal welfare experts including Professor Paul Hemsworth and Jeremy Skuse and psychologist Professor Grahame Coleman. Dr Temple Grandin was also integral in the endorsement of ProHand.

In Australia, it is offered as "ProHand Pigs" for on-farm application, and "ProHand Abattoir" for abattoir application. Planning for the development of ProHand for the transporter is also underway.

ProHand builds on the extensive scientific research on factors that affect the productivity and welfare of farm animals. It is a proven training program designed and tested on stock-people at commercial farms around the world.

There is a strong body of scientific research that demonstrates the effects of human interactions and farm animal stress responses. Important foundation research by Hemsworth et al, 1994 demonstrated that training involving cognitive-behavioural intervention (via training of stock-people) leads to reduced fear in pigs and improved welfare and productivity.

ProHand improves the interaction between livestock handlers and pigs by minimising handling stress and improving animal welfare, meat quality, staff motivation, performance, and job satisfaction.

APL continues to work with our industry to support ongoing improvements and training in abattoirs to support improved pig welfare. We have been contacting all abattoirs to extend ProHand Abattoir training through the supply chain. Every processor is committed to doing this.

## **2.3 Currently used stunning methods in Australia**

In Australia, the Model Code of Practice for the Welfare of Animals – Livestock at Slaughtering Establishments, 2001 deems it acceptable for pigs to be stunned using controlled atmosphere carbon dioxide, and two other physical methods, mechanical (e.g., captive bolt) and electrical



methods. However, the most used stunning methods for pigs in commercial abattoirs in Australia are CO<sub>2</sub> and electrical stunning.

### **2.3.1 Controlled atmosphere CO<sub>2</sub> stunning**

The use of CO<sub>2</sub> is considered a humane and acceptable method of stunning pigs in Australia (Model Code of Practice for the Welfare of Animals: Livestock at Slaughtering Establishments, 2001), the United States (NAMI, 2021), the European Union (Council Regulation (EC) No 1099/2009) and by the World Organisation for Animal Health (OIE, 2005). CO<sub>2</sub> stunning for pigs is the most used stunning method across the European Union, North America, Asia, and Canada, with rigorous scientific research underpinning all methods used.

Pre-stunning stress, the effectiveness of stunning, and the effect of the stunning method per-se needs to be considered when assessing the effect of stunning on animal welfare and meat quality (Jongman, 2022).

In CO<sub>2</sub> gas stunning, major animal benefits include:

- Pigs can be handled and stunned in small groups, which reduces human-animal contact.
- There is also no need to apply restraint. Previous research has shown this greatly reduces separation anxiety and distress for pigs (Mota-Rojas et al., 2012; Steiner et al., 2019).
- CO<sub>2</sub> gas stunning reliably produces unconsciousness (100%) in a concentration-dependent manner and most pigs do not recover from stunning, so the stun-to-stick interval is not critical.

In addition to animal welfare considerations another reason CO<sub>2</sub> has become the preferred method is that it reduces meat damage such as petechial haemorrhage and blood spots in the pork (Gregory, 2005). CO<sub>2</sub> stunning generally results in better meat quality as compared to electrical stunning. Reduced pre-slaughter stress is likely to be a major factor (Jongman 2022).

Currently, no alternative method is available that offers the proven advantages of CO<sub>2</sub>. This includes electrical stunning and the use of other gas mixtures in combination with CO<sub>2</sub>.

### **2.3.2 Electrical stunning**

Electrical stunning is mainly used in small and medium-sized abattoirs worldwide (Sindhøj et al, 2021). In Australia, the Model Code of Practice (2001) recommends head-to-back electrical stunning of pigs, with a minimum of 400 V, 1.3 amps for 2s.

### **2.3.3 Captive bolt devices**

Captive bolt devices are mostly used for stunning before slaughter of cattle, but may be used in very small abattoirs as the main stunning method for pigs.

## **2.4 Why alternative stunning methods are not a viable option**

### **2.4.1 Other gasses and mixtures**

For over two decades, research has been focussed on alternative gasses, but no alternative is yet available commercially.

### **2.4.1.1 Argon and Argon mixed with CO<sub>2</sub>**

Argon is the most studied alternative gas for stunning. There are conflicting results when the aversion of pigs to argon exposure was measured. Although it is the most common noble gas in the atmosphere it has limited availability and therefore increased cost compared to CO<sub>2</sub>. Considering the scarcity and cost of industrial grade Argon, it is not considered a viable alternative for commercial stunning, and little research into the use of Argon for stunning has been conducted in the last 15 years. Unless a technical solution can be found to recycle Argon as it is being used, this is not likely to change. As reported in different research studies, because of longer stunning times, shorter stun-to-stick intervals, pigs regaining consciousness quickly, conflicting results on aversion signs, and higher cost, the Argon and Argon mixed with CO<sub>2</sub> is not a viable alternative to CO<sub>2</sub> stunning.

### **2.4.1.2 Helium**

There has only been a single study under experimental conditions that evaluated the response to Helium exposure to date. Exposure for 3 minutes resulted reliably in unconsciousness, however the stun-to-stick interval was limited to 15-30s (Machtolf et al., 2013). Helium is lighter than air, and a 98.5% mixture is needed to induce hypoxia (therefore difficult to manage in the stunning system). The cost of Helium, lower density than air and the short stick-to-stun interval for group stunning preclude Helium as an alternative for commercial stunning.

### **2.4.1.3 Xenon**

Xenon is the only 'inert' gas which is an anaesthetic under normobaric conditions (Kennedy et al., 1992). It can be considered an ideal anaesthetic for human medicine; however, the high cost of the gas has prevented its general use for anaesthesia (Baumert, 2009). Therefore, it is not a viable option as a commercial stunning agent within the livestock system.

### **2.4.1.4 N<sub>2</sub> and N<sub>2</sub>/CO<sub>2</sub> mixture**

Nitrogen (N<sub>2</sub>) is widely available as it is present in high concentrations (79%) in atmospheric air. However, N<sub>2</sub> is slightly lighter than air and is, therefore, hard to contain in a stunning pit. The lowest level of O<sub>2</sub> that can be achieved in a pit filled with N<sub>2</sub> is 6% O<sub>2</sub> (Dalmau et al., 2013), which is insufficient to induce unconsciousness in pigs. As inert gasses rely on residual concentrations of O<sub>2</sub> below 2%, N<sub>2</sub> is not suitable as a single gas contained in a pit in current commercial stunning systems.

With N<sub>2</sub>/CO<sub>2</sub> gas mixtures, the time to unconsciousness is increased, and therefore, the total time to an aversive stimulus is increased. Pigs return to consciousness sooner. In addition, there are negative effects on the meat quality of N<sub>2</sub>/CO<sub>2</sub> gas mixtures compared to 90% CO<sub>2</sub>. Therefore, N<sub>2</sub>/CO<sub>2</sub> gas mixtures would have limitations as an alternative gas to high concentrations of CO<sub>2</sub> alone.

### **2.4.1.5 Nitrous oxide (N<sub>2</sub>O)**

N<sub>2</sub>O (Laughing gas) was found to be less aversive to piglets. However, N<sub>2</sub>O is considered a potent greenhouse gas, which limits the possibility of using it on a commercial scale.

### **2.4.1.6 Conclusion comparison of gas alternatives**

Over the past two decades, there have been numerous research projects conducted to find alternative gases to CO<sub>2</sub> stunning, but no alternative gases are yet available commercially that provides animal welfare benefits over CO<sub>2</sub>. The issues reported with alternative gases and mixtures include longer stunning times, shorter stun-to-stick intervals, conflicting results regarding aversion signs, higher cost of gases, difficulty in handling lighter gases than air, and the negative impact on meat quality and the environment.

### **2.4.2 Other stunning methods**

#### **2.4.2.1 Low Atmospheric Pressure Stunning**

Low Atmospheric Pressure Stunning (LAPS) causes loss of consciousness by inducing hypoxia. McKeegan et al. 2020 study on conscious pigs concluded that LAPS was not a viable, humane alternative to CO<sub>2</sub> stunning. LAPS stunning causes the eardrums of the majority of pigs to ruptured, and haemorrhages and congestions were reported in the lungs.

#### **2.4.2.2 Microwave stunning**

Microwave stunning has been proposed as an alternative method for reversible Halal stunning of cattle and has not been studied in pigs. This technology is still experimental and at this stage may not reliably deliver energy levels that result in long-term unconsciousness. A disadvantage of this stunning method is that the head needs to be restraint during the application (Small et al., 2019). This level of restraint would be highly aversive to pigs and cannot be considered a humane alternative for current stunning systems and holds no advantage over electrical stunning.

#### **2.4.2.3 Single Pulse Ultra-High Current**

Single Pulse Ultra-High Current (SPUC) is another potential alternative to head only (Halal) electrical stunning and has been studied in cattle but not pigs. The method requires operators to be in the vicinity of animals and require firm restraint, which is a stressor for pigs and, thus, will result in comparatively labour-intensive activities which can reduce capacity (Sindhøj et al., 2021).

## 3 The industry-led voluntary phase out of gestation stalls

### Term of Reference Three: The outcomes of the 2017 industry-led voluntary phase out of the use of sow stalls.

Note: the phase out of the use of gestation stalls also known as sow stalls was voluntary, so throughout our submission we will refer to it as the industry-led voluntary phase out of gestation stalls.

There are a range of stalls that are used within the pig industry - mating stalls, gestation stalls, boar stalls and farrowing crates. Within this section we will cover the move towards broad adoption of group housing for sows as that was the most significant outcome of the voluntary phase out.

#### Facts

- Under the current Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition), the use of a stall during gestation is allowed, however a sow must not be confined in a stall for more than six weeks of any gestation period. An exception is for individual sows that are under veterinary advice or special care by a competent stock-person.
- In Victoria, standards from the Model Code of Practice for the Welfare of Animals: Pigs, are prescribed into Regulations under the Livestock Management Act. Standard 4.1.5 states that a sow must not be confined in a stall for more than six weeks of any gestation period. This has been the law in Victoria since 20 April 2017.
- Under the Industry-led voluntary phase out sows can only be kept in stalls for a maximum of five days after last mating, after which a sow is moved to loose/group housing.
- Farms can be certified as gestation-stall free under APIQ√<sup>®</sup> Option A: Gestation Stall Free (GSF).
- Under APIQ√<sup>®</sup> Option B: Customer Specifications for Supply to Coles Supermarkets Australia Pty Ltd (Coles) (Csc), sows and gilts are not confined in gestation stalls at any stage of their lives. -Individual mating stations-may be used for a maximum of 24 hours.

91% of our industry is APIQ√<sup>®</sup> accredited.

88% of APIQ√<sup>®</sup> accredited farms are option A verified.

80% of the commercial sow herd is Option A verified.

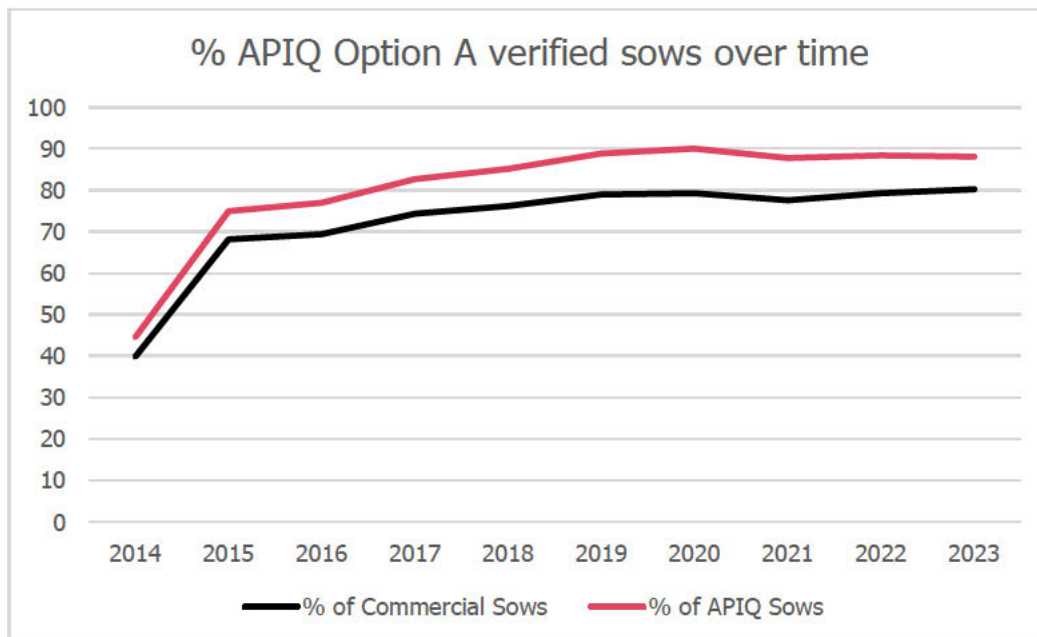


Figure 1. APIQ verified adoption of Option A (voluntary Gestation Stall Free 2014 – 2023)

### Timeline for the phase out

2007 – Model Code of Practice for the Welfare of Animals: Pigs (2<sup>nd</sup> edition) review undertaken.

2007 - Some industry members commit to phasing out the use of gestation stalls.

2008 – Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition released) includes 10-year implementation period for producers to meet the new requirement of 42 days maximum in gestation stalls.

2010 – November announcement of Industry commitment to a voluntary phase out of the use of gestation stalls from six weeks to a maximum of five days from last mating.

2010 – Coles announces full phase out of the use of gestation stalls. Mating stalls allowed for a maximum 24 hours.

2011 – Producers transition to group housing of sows. The voluntary actions were not funded through premiums or any assistance. Impact is 12-18 months production downturn and significant investment in infrastructure, research to support animal management and staff training on how to manage sows safely within group housing.

2013 – APIQ<sup>✓</sup>® Certified Producers are now able to seek Option A verification.

2014 - Producers are able to verify compliance with Coles customer specifications (Option B) within APIQ<sup>✓</sup>®, reducing auditing duplication.

2017 – Review of Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP) was expected to commence in 2017 but did not proceed. The review of the MCOP remains on the waiting list to progress the review. The broader livestock industries have significant concerns regarding the S&G review and development process and would not support the commencement of a review while these concerns remain unaddressed.

2017-2023 - Industry continues to undertake research to support producers to utilise different housing options. Extension activities provide opportunities for producers to become certified against Option A.

## Key points

- The Australian Pork industry, through the Pork CRC, APL levy and matching fund investments and industry led projects invested tens of millions of dollars to support producers in their move towards the use of group/loose housing during the gestation period. The move to house sows in loose or group housing required significant on farm investment in both infrastructure and training to support producers and the staff manage sows in group housing.
- Under Victorian regulations, there is a legal requirement of less than or equal to 42 days (six weeks) in a gestation stall.
- In line with the voluntary phase out commitment 80% of the commercial sow herd is independently verified as Option A compliant. This standard is in line with the terms of the voluntary phase out to move to a maximum of 5 days post mating before being moved into group/loose housing and is significantly better than the current MCOP or Victorian regulatory requirements.
- The commitment to a voluntary phase out came after many years of research into alternative housing methods, animal welfare and behaviour research. The move required knowledge of how to manage sows in group housing and to provide time for the development of training to support staff to safely manage the sows in loose or group housing.

## 3.1 The voluntary phase out of Gestation stalls and move toward group housing

### 3.1.1 Background

Historically commercial production moved away from traditional group housing of sows to individual housing in order to improve sow welfare and ensure sows could receive individual care. Gestation stalls were designed to provide protection for individual pregnant sows, which can prevent both injuries and abortions. Gestation stalls also allow sows to be protected while they were individually fed according to their unique needs, inspected easily for any signs of illness and individually treated.

For the past 30 years the Australian pig industry has undertaken research in sow housing, with increasing emphasis on the welfare of sows in stalls. In 2010 the Australian pork industry, in a landmark decision for an agricultural industry, agreed to an industry-led voluntarily phase out of gestation stalls for sows by 2017.

Gestation-stall free pork production was defined by an expert group of producers and researchers as sows being loose-housed i.e. sows are able to get up and down and turn around from five days after insemination/mating until being moved into the farrowing housing.

Since this stance for voluntary removal of sows stalls post-insemination by the Australian pork industry, there has been added pressure from retailers to further reduce the time spent in sow stalls. Many of the pork producers supplying these retailers have transitioned to group/loose

housing for all sows from weaning, and gestation up until entry to the farrowing facility for the subsequent farrowing and lactation period. However, sows can be kept in a mating station for a maximum of 24 hours to facilitate artificial insemination (AI).

Implementing loose or group housing for sows at any stage post-weaning is challenging, as adequate sow nutrition, optimum welfare, minimal stress and aggression between sows and maintenance of productivity must be ensured.

Sows are usually mixed into groups at weaning or within five days after insemination. When mixed at weaning, housing after weaning is an important period for sow welfare and reproductive performance. Some management issues are similar to those for sows mixed into groups after insemination, such as behaviours which include aggression associated with grouping unfamiliar sows and will be dependent on pen design and other infrastructure such as feeding systems. Other issues may be specific to the weaning or post insemination period, such as the consequences of housing at time of insemination. For example: potential injuries arising from the behaviour of sows on heat. Management considerations include providing: increased floor space and a non-slip floor, and considering the option of individually housing sows during the period in which they display oestrus. Producers consider the options and where necessary seek expert advice to reduce stress and minimise injury to sows through the breeding period.

Mixing sows within a group or loose housing system, about five days after insemination, allows sows to be mixed at a time when they are the least vulnerable to pregnancy loss (prior to embryo implantation at days 11-12 of gestation) and also allows for sows that are mated over a period of a few days to be moved to loose/ group housing all at the same time. Moving sows as a group is important and supports optimal sow welfare. Sows should only be mixed once so that the natural dominance hierarchy within the group can be established early (before the vulnerable period for pregnancy loss at around days 11-12 of gestation) with the grouping then remaining stable throughout the duration of gestation.

A challenge when housing pigs of any age in groups is managing natural pig behaviours and it is well researched that persistent aggression reduces pig welfare, mainly through increased stress and injury and restricted access to feed and preferred lying areas. The challenge is to allow natural behaviours while minimising the time and impact of these aggressive confrontations. Aggression is often reported to peak about two hours after mixing and decreases significantly thereafter as a dominance hierarchy is established. Aggression has been reported to reach lowest levels within one to two days post-mixing. The rate of decline of aggression is supported by producers designing spaces to ensure access to resources such as feed, water and lying areas.

### **3.1.2 APIQ<sup>✓</sup>® standards – Option A: gestation stall free (GSF)**

Standard under which farms are verified. The piggery production system must comply with the APL Definition for Gestation Stall Free (GSF) and APIQ<sup>✓</sup>® Standards and Performance Indicators for GSF production.

*Performance Indicators:*

*A. Sows and gilts are kept in loose housing from at least five (5) days after service until one (1) week before farrowing, where service refers to the last mating.*

– *Sows and gilts kept in loose housing have freedom of movement i.e. they can turn around and extend their limbs freely.*

– *Space allowances for sows and gilts meet the requirements of the Model Code of Practice for the Welfare of Animals – Pigs.*

– *Free access pens and/or electronic sow feeding systems, which contain individual feeders or feeding accommodation, but which allow the individual pig to go in and out at will, can be used.*

*B. Individual pigs can be temporarily confined:*

– *In Hospital or Special Care Stalls to allow sufficient time to provide special care for sickness, injury, medications, and other health treatments under veterinary advice, or under special care by a competent stockperson.*

– *In feeding stalls which can be used for up to three (3) hours in one (1) day for feeding and/or animal husbandry reasons such as vaccination and pregnancy testing.*

*C. Records must be kept for any sow or gilt temporarily confined showing why the pig(s) were/are temporarily confined and duration of confinement.*

– *If temporary confinement is used these practices are described in the piggery SOPs and/or Work Instructions.*

### **3.1.3 APIQ✓<sup>®</sup> standards - APIQ✓<sup>®</sup> Free Range (FR)**

The standard under which farms are verified as Free Range.

*The piggery provides suitable paddocks with feed, water and shelter facilities to meet all pigs' social and physiological requirements when kept in an outdoor environment. Impacts on the environment and stocking rates are managed according to APIQ✓<sup>®</sup> Environmental Standards Performance Indicators:*

*A. All pigs live outdoors with free access to shelter at all times; except where temporary confinement applies. Approved temporary confinement includes, but is not limited to:*

– *keeping piglets in huts or shelters after birth using fenders for up to 14 days for protection;*

– *keeping weaners in weaner areas post weaning until piglets are a maximum of 8 weeks of age, outdoor areas for weaners must be a minimum 150% of the shelter space provided;*

– *holding sows in pens for mating during daylight hours, but not overnight;*

– *holding finishers in pens prior to load out for up to 48 hours. (Note: These practices must be described in the piggery Standard Operating Procedures and/or Work Instructions).*

– *holding pigs in pens for approved veterinary treatments with a record of confinement kept.*

*B. Suitable paddocks with rooting and/or foraging areas are available to pigs at all times:*

– *Wallows are provided where State regulations and the season permits; and/or*



– *Shade (including but not limited to trees, tree lines, hedges, shade stands), sprinklers, or other mechanical means are provided to cool pigs when necessary.*

*C. Sufficient shelter is available to provide protection from the elements to all pigs at all times: – Steps are taken to minimise the risks to pigs from predators.*

– *All pigs are able to move freely in and out of shelter provided.*

– *Bedding is provided in the shelters.*

*D. Shelter for dry sows in groups, lactating sows and boars meets the space allowance guidelines in the Model Code of Practice for the Welfare of Animals – Pigs, Appendix 3, Table 8.*

*E. APIQ✓<sup>®</sup> Environmental Standards for Outdoor Pigs are met.*

*F. Nose ringing, teeth clipping, tusk trimming, tail docking and surgical castration are not permitted.*

## 4 Pig Housing

### Terms of Reference Four: Current industry breeding and housing practices.

Note: Pig producers choose to use a range of housing designs and practices based on regularly reviewed and updated science. Having the option of different types of housing and levels of confinement at different stages of production is recognised by veterinarians and other animal welfare experts as being crucial to support the health and wellbeing of both sows and piglets.

Pig housing is designed to provide an ideal environment where pigs can be protected from the elements, where an appropriate temperature (based on an animal's requirement) is maintained, and where they have appropriate access to food and water. Differing levels of confinement throughout the production stages of a pig's life help to ensure their safety and health by facilitating safe social interaction between pigs, providing protection during stages at which they are vulnerable to injury (or in some cases death) from other pigs, such as in the period after they are born (up to 4 weeks of age) or when sows are coming into heat (oestrus), or during early gestation.

As recognised by the Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP), a measure of good welfare in farmed pigs is that they are able to deal with the environment they are placed in, and a farm can demonstrate growth rates, reproductive performance, disease levels, injuries and death rates within industry standards.

1. Commercial piggeries are designed on the basis of protecting the pigs from environmental and biosecurity risks, this is considered an ethical imperative when raising pigs for the production of food.
2. Pig housing also has to consider the size and behavioural characteristics of pigs and provide an environment that is safe for the humans managing their care.

### 4.1 Background pig housing and the use of confinement

#### 4.1.1 Housing types

##### 4.1.1.1 Mating stall

A mating stall is an enclosure in which a sow is kept for the purposes of mating/ breeding. After a sow's piglets are weaned, a sow will typically come back onto heat (oestrus) within a few days. A sow which is "on heat" can be successfully mated. Sows are typically housed in mating stalls from weaning up until 5 days post mating.

Using mating stalls ensures that sows are protected from other sows that are also on heat during this period. When a sow is on heat, she can display behaviours as mounting and riding of other sows, as well as nosing and chasing behaviours that can be quite aggressive. These behaviours are natural and driven by hormones and only last for a few days. However, they can lead to serious injuries of both the sows displaying the behaviour as well as those that are on the receiving end of the behaviour. The mating stalls are also important for protecting the

stockperson from these sow behaviours as well and facilitating a successful mating (particularly if mating is undertaken via Artificial Insemination (AI)).

Sows are kept in a mating stall for up to five days after they are mated for two reasons:

1. Keeping the sow in a mating stall (and therefore safe from other sows) protects her during the early stages of fertilisation and embryo development, greatly increasing the chances of a successful pregnancy.
2. It lets the sows to be mixed back into their groups all at the same time, when the entire cohort (group) has come off heat. This "early mixing" strategy is a key success factor for group housing. By mixing sows at the same time, this shortens the stressful mixing period. Rather than gradually adding sows to the group after each mating and aggression occurring with each addition over the space of a week, sows are mixed all at once and their natural hierarchy established.

If sows are housed in mating stalls from weaning until 5 days post mating, they will on average spend 10 days in a mating stall before moving to either a gestation stall or group housing.

#### 4.1.1.2 **Gestation stall**

A gestation stall is an enclosure in which a sow is kept during gestation. A sow will be moved from a mating stall into a gestation stall after she has been mated. Gestation and mating stalls are similar in design and both serve to protect the sow and allow for individual care during the most vulnerable time of her breeding cycle. In Australian systems that use gestation stalls, sows will be typically housed in them for the first 28 days of gestation. A sow will cycle every 21 days and will return to heat if pregnancy has not been successful within this 28-day period. Furthermore, sows can reliably be pregnancy checked via ultrasound after 21 days gestation. Those sows that are confirmed pregnant will be moved to group gestation housing at around day 28 of gestation.

As mentioned above in Section 3, the majority of sows in Australia are housed in group or loose housing systems from 5 days post insemination and therefore are not housed in gestation stalls at all. Those that still employ the use of gestation stalls do so according to the standards set out in the Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP).

#### 4.1.1.3 **Farrowing crates**

A farrowing crate is:

- An enclosure in which a sow farrows (gives birth) and then remains with her litter, typically for around 4 weeks.
- Routinely used in the Australian pork industry (and internationally).
- The crate protects piglets from being crushed to death during the piglets' most vulnerable period.
- Allows a sow to stand up, lie down, and stretch out, while keeping her piglets safe in a separate section.

- The crate still allows the sow to nurse her piglets.
- Allows micro-climates in different parts of the crate as the critical temperature thresholds of the sow and the piglets are quite different.
- Farrowing crates also help protect any stockperson caring for the sow and piglets.

#### **4.1.1.4 Boar Housing and Management**

A mature boar is an uncastrated male over 9 months of age. Once a boar reaches maturity they may be kept at a 'Boar Stud' where their semen is collected and processed to be used in Artificial Insemination programs. Mature boars are also kept in the mating area of the farm to be utilised as 'teaser' boars (to detect sows who are on heat (in oestrus)) or for natural matings.

Housing systems that provide boars with more freedom of movement than conventional stalls are encouraged for use, provided that such systems are consistent with management of boar hygiene and operator health and safety requirements. It is recommended that aggressive adult boars are housed individually to prevent bullying and injury to themselves or their pen mates from fighting. It is noted that boars raised together are less likely to fight and for this reason often boars will be housed in compatible pairs or small groups.

#### **4.1.2 Model Code pig housing standards**

The MCOP outlines the following standards for pig accommodation:

*4.1.1 Accommodation for pigs must be designed, constructed and managed in such a way that it protects pigs from adverse weather, injuries or other harm.*

*4.1.2 Accommodation for pigs must provide at least the minimum space requirements identified as Standards in Appendix 3.*

*4.1.3 Sows and boars accommodated individually in stalls must be able to stand, get up and lie down without being obstructed by the bars and fittings of the stall, to lie with limbs extended, to stretch and to be able to freely undertake such movements. Specifically, in the case of sows and boars:*

*(a) They must be able to stand up at rest in a stall without simultaneously touching both sides of the stall;*

*(b) When they lie down in the stall, their snout and hindquarters must not simultaneously be touching the ends of the stall;*

*(c) If the stall has bars along the top these must not touch their backs when standing at rest or when they have their heads down feeding;*

*(d) The placement of drinkers and/or feed/water troughs in the stall must be easily accessible to them, but must not prevent ability to stand, stretch and lie down;*

*(e) When lying down, any contact with their neighbours in stalls on either side must not result in injury.*

4.1.4 Stalls and farrowing crates must be designed and constructed to minimise aggression between pigs and overlying of piglets by sows.

4.1.5 From 10 years after endorsement of the Code a sow must not be confined in a stall for more than six weeks of any gestation period. An exception is for individual sows that are under veterinary advice or special care by a competent stock-person.

4.1.6 Facilities for lactating sows must allow them to:

(a) Stand and lie down without obstruction by the bars or fittings of the crate;

(b) Give birth to piglets without obstruction, and minimise losses of piglets from crushing, trapping or injuries;

(c) Suckle piglets so that both sides of the udder are accessible;

(d) Access feed and water without obstruction.

4.1.7 Sows confined in farrowing crates must not be confined in these for more than six weeks in any one reproductive cycle, except in an emergency, e.g. where a sow is required to foster a second litter after her own piglets are weaned. In such an exceptional situation the stock-person must provide additional care to the sow.

4.1.8 Where boars are kept constantly in stalls they must be released for use for mating or exercised at least twice per week.

4.1.9 Tethers must not be used to restrain pigs.

4.1.10 Boars run in groups must be monitored daily and managed to ensure that subordinate boars are not seriously injured or subjected to persistent aggression by other boars.

Table 6. Minimum space requirements for adult pigs

<i>Class</i>	<i>Minimum space allowance per adult</i>
<i>Gilts in group housing (mated or selected for breeding and &gt;100 kg LW)</i>	<i>1 m<sup>2</sup></i>
<i>Sows in group housing</i>	<i>1.4 m<sup>2</sup></i>
<i>Adult pigs in individual stalls</i>	
<ul style="list-style-type: none"> <li>• <i>All new installations</i></li> </ul>	
<i>Sows</i>	<i>0.6 m x 2.2 m</i>
<i>Boars</i>	<i>0.7 m x 2.4 m</i>
<ul style="list-style-type: none"> <li>• <i>All stalls, including those installed prior to endorsement of this Code</i></li> </ul>	<i>Must provide the outcome-based Standards of Section 4.</i>
<i>Boars in individual pens (living space only)</i>	<i>6.0 m<sup>2</sup></i>

<p><i>Sows in farrowing crates</i></p> <p><i>New farrowing crate installations:</i></p> <ul style="list-style-type: none"> <li>• <i>Crate dimensions</i></li> <li>• <i>Farrowing crate and creep area</i></li> </ul> <p>-----</p> <ul style="list-style-type: none"> <li>• <i>All farrowing crates, including those installed prior to endorsement of this Code</i></li> </ul>	<p><i>0.5 m x 2 m</i></p> <p><i>3.2 m<sup>2</sup></i></p> <ul style="list-style-type: none"> <li>• <i>The minimum length must be 2 metres. This is the internal measurement, inclusive of feed and water facilities and a rear anti-crush rail placed where required.</i></li> <li>• <i>The minimum width of 500 mm is to be taken at not more than 450 mm above the floor level.</i></li> <li>• <i>Where crates installed prior to this Code are smaller than this, they must only be used for smaller sows to achieve the Standards of Section 4.</i></li> </ul> <p>-----</p> <ul style="list-style-type: none"> <li>• <i>Must provide the outcome-based Standards of Section 4.</i></li> </ul>
<p><i>Farrowing pen</i></p>	<p><i>5.6 m<sup>2</sup> per sow</i></p>

## 4.2 Workplace safety

As explained in response to Terms of Reference 1, a safe workplace must be provided for those working with and tending to the welfare of pigs.

The Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP) and Companion Handbook to the Model Code of Practice for the Welfare of Pigs (3<sup>rd</sup> edition) (Companion Handbook) reinforce the need to ensure operator safety along with animal welfare needs. For example:

- "Housing should meet animal welfare, environmental and operator health and safety requirements".<sup>17</sup>
- Use of husbandry procedures to ensure these can be done "safely, cleanly and quickly".<sup>18</sup>

Staff safety and the need to minimise potential for human injury is a key consideration in housing and confinement designs, with reduced confinement requiring higher levels of

<sup>17</sup> Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> Edition), Section 4 Accommodation.

<sup>18</sup> Companion Handbook to the Model Code of Practice for the Welfare of Pigs (3<sup>rd</sup> ed.), Section 5 Husbandry.

interactions with sows and higher skilled labour. Non-confinement involves managing exposure of piglets and stock-people to aggressive sows.

As well as improving piglet survivability, forms of confinement have brought additional staff safety benefits given the risk of stockperson-directed aggression by the sow is higher around farrowing (Marchant 2002).

As outlined in the Companion Handbook, excellent stockmanship is critical for good sow health, and in any housing system, stock-people need to master and confidently manage many elements to ensure all sows receive adequate feed and do not suffer from aggressive interactions. This includes:

- Identifying sows in groups that are unable to compete, or have been injured, so they can be given extra care;
- Quickly taking appropriate actions and
- Undertaking suitable handling techniques for sorting individual animals from a group, to eliminate stress and potential for human injury.

Maintaining safety during procedures such as oestrus and pregnancy checking, as well as during feeding when the interaction and aggression between sows is strongest, requires particular care.

Since the development of the Model Code and Companion Guide, the industry has continued to invest in research to provide science-based data regarding pig welfare, under different systems of production and housing. As outlined in Chapter, 3 the move to group housing required millions of dollars of investment in research to support shed design, options to support retrofitting existing sheds, and staff training in management and safety.

## 5 World leading, Australian focussed best practice

### Terms of Reference Five: International comparisons to determine industry adherence to best practice standards.

Note: In most cases 'best practice' is a recommendation, rather than a standard (legislative requirement). Until a practice is fully researched, developed, extended, adopted and assessed under Australian conditions it cannot be incorporated into either regulatory standards, independently audited industry standards or even voluntary industry guidelines. Therefore the 'adherence' to 'best practice standards' in the Australian context is the adherence to the Standards outlined under the Model Code of Practice for the Welfare of Animals: Pigs (3<sup>rd</sup> edition) (MCOP).

The Australian pig industry is a global leader in pig welfare and whilst we are aware of the various standards (or rather recommendations – i.e. they are not legislated) published by the multitude of various international pig industries (there is no one global 'best practice standard') we must do our own due diligence and invest in Australian research to help ensure that any recommendations for best practice in the Australian pig industry are backed by robust science and a fit for purpose in our unique operating environment. The pig research community in Australia is well recognised globally for its innovative approach to all aspects of pig production as well as the integrity of our research outcomes. We have some of the world's most celebrated and revered animal scientists undertaking globally relevant research for the Australian pig industry – and we are extremely proud of this fact.

The Australian pork industry considers 'Best Practice' to be something that is outcome based rather than being prescriptive. Australian pig producers are innovative and at times must operate within small margins, so if a desirable outcome can be met even if the operating environment differs between different businesses this is seen as a positive thing for our pigs and our producers.

For example, the Australian pig industry is seen as a global leader in the move to loose housed group gestation housing of sows during gestation. Of the producers that have adopted group housing as per the industry voluntary definition, you would be hard pressed to find more than a handful of producers managing their pigs the exact same way, however their outcomes in regard to sow welfare and production would be very similar. The Australian pig industry invested millions of dollars over a number of years to provide producers with the information and tools to move to loose housing of gestating sows. As you can see from the publication "Mixing Sows - how to maximise welfare" (<https://porkcrc.com.au/wp-content/uploads/2014/04/Mixing-Sows-How-to-Maximise-Welfare-Manual.pdf>). There are many considerations (based on research undertaken in Australia), that need to be addressed to successfully manage gestating sows in loose housed systems.



## 5.1 Comparison of Stunning regulations

Jurisdiction	Permitted stunning methods			
	Carbon dioxide	Mechanical	Electrical	Legislation/ Source
<b>Australia</b>	Permitted	Permitted  (Emergency slaughter, or for large sows or boars.) Smaller slaughterhouses may use a captive bolt for stunning all animals.	Permitted, with the head-to-back stunning method recommended	Primary Industries Standing Committee Model Code of Practice for the Welfare of Animals Livestock at Slaughtering Establishments
<b>New Zealand</b>	Not currently utilised	Captive bolt and/or suitable firearm permitted	Permitted	NZ Code of Welfare- Commercial slaughter
<b>United Kingdom</b>	Permitted	Captive bolt and/or concussion permitted	Permitted	The Welfare of Animals (Slaughter or Killing) Regulations 1995
<b>United States</b>	Permitted	Captive bolt and gunshot permitted	Permitted	US Code of Federal Regulations -  Animals and Animal Products
<b>Canada</b>	Permitted	Delivering a blow to the head with a mechanical device permitted	Permitted	Safe Food for Canadians Regulations
<b>Europe</b>	Permitted	Penetrative captive bolt, firearm with free projectile, and percussive blow to the head (piglets up to 5kg only) all permitted	Permitted	Council Regulation (EC) No 1099/2009  of 24 September 2009 on the protection of animals at the time of killing

## 5.2 APIQ✓® and annual audits versus international audit systems and requirements

Looking internationally at other QA programs, most are similar to APIQ✓® in terms on what is covered and the general compliance rate of their country's industry. We also see they have extended their QA from on-farm into other areas of the supply chain and use independent auditing like APIQ✓®.

### Red tractor – UK

Red Tractor Food Assurance is the UK's biggest farm and food assurance scheme covering pork as well as beef, lamb, dairy, poultry, crops, fruit, and vegetables. According to the website Red Tractor has 2,300 pig members in England, Wales, and Northern Ireland, covering 95% of UK pork<sup>19</sup>. Similar to APIQ✓® they develop standards based on science, evidence, best practice and legislation and cover animal welfare, food safety, traceability, and environmental protection.

Like APIQ✓®, Red Tractors pig specific standards cover staff training, pig housing, traceability, nutrition, health, and welfare.

### PigCare – New Zealand<sup>20</sup>

PigCare™, developed by Massey University with input from veterinarians, pig producers, New Zealand Pork, and the Ministry for Primary Industries, provides assurance that certified commercial pig producers meet a high standard of animal welfare.

Producers under the PigCare™ program are audited annually against standards for pig health, behaviour, stockmanship, management, biosecurity and husbandry practices, in addition to the regulations set out in the Code of Welfare for Pigs.

As of 1 October 2023, there were 71 farms certified under the PigCare™ program, representing more than 95% of the commercially produced pork in New Zealand.

Like APIQ✓®, every year the PigCare™ programme is reviewed in light of current scientific research, regulatory requirements and good practice that supports the welfare of pigs. This ensures there is ongoing improvement of the programme.

### Pork CheckOff – USA<sup>21</sup>

Pork Checkoff provides comprehensive training programs for different roles and stages in production, ensuring that all caretakers and handlers receive the training needed for their particular duties to ensure a safe, high-quality pork supply; treating animals appropriately is not only the right thing to do, but customers expect it. There are 3 programs under the Pork CheckOff program, these are:

- Transport Quality Assurance (TQA) that trains pig transporters, producers and handlers how to handle, move and transport pigs.

<sup>19</sup> <https://redtractorassurance.org.uk/about-red-tractor/compliance/quarterly-reports/>

<sup>20</sup> <https://www.nzpork.co.nz/farmers/pigcare-tm>

<sup>21</sup> <https://porkcheckoff.org/certification-tools/training-certification/pqa-plus/>

- Youth Quality Assurance Program (YQA) for ages 8 to 21 years old who show or produce pigs.
- Pork Quality Assurance Plus (PQA Plus).

The Pork Quality Assurance Plus program is most comparable to the APIQ program. It is an education and certification program designed to help pig producers and their employees continually improve production practices. It addresses food safety, animal well-being, environmental stewardship, worker safety, public health and community.

There are two components to PQA Plus. First, individuals can become certified through an education program. Second, farms can receive PQA Plus site status through an on-farm site assessment with a PQA Plus Advisor. As of May 2023, 85% of the US pig population has been assessed under PQA<sup>22</sup>.

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<sup>22</sup> <https://porkcheckoff.org/news/flagship-pork-checkoff-programs-receive-iso-compliance/#:~:text=Pork%20Producers%20By%20the%20Numbers%2061%2C600%2B%20PQA%20Certified,PQA%20Plus%20Site%20status%2029%2C000%2B%20TQA%20Certified%20individuals>

## 6 Other matters

### Terms of Reference Six: Any other relevant matter.

#### 6.1 Animal welfare governance

Animal health and welfare is an integral part of sustainable livestock agriculture. To be sustainable an industry must employ a holistic approach to animal health, welfare, biosecurity, environment, people, and prosperity, as they are all intertwined. For example, poor biosecurity practices, could result in a disease outbreak, which would affect the health of the pig, potentially causing poor welfare outcomes. This holistic approach is supported under the current agriculture portfolios of government.

Separating animal welfare from agricultural departments would create a divide in the progress and creation of robust policy and regulation of agricultural industries. Separation could see the loss of valuable expertise as people are split across policy and regulatory areas. This would further segment the process for development of animal welfare regulation and policy, causing delays in progress and innovation of the overall framework governing animal welfare in Australia.

The method of developing robust animal welfare standards must be informed by unbiased, up to date scientific advice and practical, evidence-based industry experience to ensure good animal welfare outcomes. It is key that industry, government, and relevant animal welfare groups, such as the RSCPA are represented during the development and consultation of welfare standards, to ensure balanced welfare outcomes. Industry plays an important role in the setting of animal welfare standards and bears the responsibility for their implementation and management. Consultation with producers and other supply chain stakeholders in their development is critical. The process to develop standards should be informed by those experts in the animals under consideration. In particular industry, animal health, welfare, and production expertise.

Over the past few years, APL has been advocating for the review and refinement of the current national standards and guidelines process. There has been a breakdown in the current process, with transparency and confidentiality lost. This has resulted in a lack of trust in the process by all stakeholders involved in the process. Any future approach to the development of standards and guidelines must provide a single, consistent approach that is transparent, trusted and supported by industry, government, and the broader community.

#### 6.2 Animal husbandry procedures

The Australian Pork industry employs a highly skilled workforce that works closely with veterinarians and other service providers to ensure the best health and welfare of the pigs in their care.

The current balance of husbandry overseen by competent stock-people in combination with specialist advice from veterinarians, where required, provides a practical and achievable way to meet animal welfare and husbandry needs.

APL believe that producers and associated, qualified agricultural professionals (such as AI technicians) should continue to be recognised as competent non-vet practitioners. Pig producers understand what is reasonably necessary for their pigs and meet care requirements inherently, they seek veterinary advice where needed, and align with state regulations, industry quality assurance auditing systems and contracts.

Australia is currently experiencing a national shortage of veterinarians. Jobs and Skills Australia's 2023 Skills Priority List<sup>23</sup> shows that the occupation of veterinarian has experienced a shortage in every state and territory for the past three years. By working together, producers and veterinarians can share the husbandry requirements of the pigs and ensure their health and welfare is maintained.

If all husbandry procedures were required to be undertaken by a veterinarian it is expected there would be delays in care due to availability, travel distances and limitations due to biosecurity, as vets cannot visit more than one farm in a day and many farms require a minimum 48 hours between entering another livestock farm livestock facility and entering a pig farm. Delays in husbandry practices could result in poor welfare outcomes for the pig, resulting in pain and harm.

### **6.3 Surveillance within abattoirs**

The responsibility for animal welfare legislation in Australia lies with the States and Territories, meaning they have jurisdiction to prosecute animal welfare cases. The Federal Government regulates export-certified abattoirs through Department of Agriculture, Fisheries and Forestry (DAFF), which has regulatory safeguards to ensure that animal welfare legislative requirements are maintained in accordance with the relevant State or Territory animal welfare regulatory authorities. Export-certified abattoirs must comply with approved arrangements, including animal welfare standard operating procedures that DAFF veterinarians verify.

In Australia, Export and Domestic abattoirs are supported by standards and guidelines that help these establishments comply with legal requirements. This includes AS 4696:2023 (Australian Standard - Hygienic production and transportation of meat and meat products for human consumption), Land Transport Standards, and fit-to-load guidelines. Regular, continuous verifications and external audits are carried out to guarantee the welfare of animals at facilities and demonstrate that they are continuously in compliance with appropriate animal welfare requirements.

We believe fostering and maintaining a culture that ensures that management and personnel at all processing facilities become fully aware and consistently apply procedures to comply with the required animal welfare standards is the best way to efficiently manage animal welfare. There are research studies that indicate that continual electronic surveillance does not lead to sustained behavioural change, however they support that reinforcement of training and good team leadership/personal reminders are far more effective. The industry has expressed concerns regarding data privacy, cyber security breaches, misuse of video surveillance and additional costs.

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Jobs and Skills Australia's 2023 Skills Priority List, accessed 5 January 2024;  
<https://www.jobsandskills.gov.au/data/skills-priority-list>

Therefore, APL has developed the ProHand™ Pigs and Abattoir program. ProHand was developed in recognition of the vital role stock-people play in the welfare, health, and productivity of livestock under their care. ProHand is a computer-based training program that uses a cognitive behavioural technique to target and change the attitudes of stock-people towards livestock.

ProHand Pigs is a well-regarded training package that teaches or reiterates effective, high-welfare, low-stress handling of pigs by providing stock-people with an understanding of pig behaviour. It also provides the stock-person with an understanding of their own behaviour and how it might affect their interactions with the pigs in their care. ProHand is delivered as a free online training program.

There are different sections covering important topics such as the fear of humans in pigs and how that affects handling, productivity, and welfare. It also covers professional handling guidelines for stock-people managing pigs, and how stock-people can change their attitude and behaviour. To date, APL research has driven continuous improvement and significant investment across the industry, with 80, soon to be 85, per cent of Australia's commercially produced pigs being processed at abattoirs that have adopted world-leading infrastructure, enhanced by the application of scientifically backed animal handling techniques (ProHand™ Pigs and ProHand™ Abattoir).

## **6.4 Food security and local food supply chains**

The importance of agriculture to Australia's economy and in ensuring food security has been highlighted through the COVID-19 pandemic. The domestic pork industry is a vital part of Australia's food supply chain, with pork the second most consumed meat in Australia and all fresh pork consumed in Australia domestically sourced.

Approximately 80 per cent of Australia's small goods products are imported and there is a significant opportunity to build the Australian smallgoods sector and increase food security in this space. Domestic production of small goods builds the flow on effects of diversified market opportunities, provides opportunities for value adding domestically produced pork products and provides a valuable market for larger pigs. This is an opportunity to ensure that local pork can be used in these products, where it is known that it meets Australian welfare standards.

Local food supply chains are critical for the pork industry. This was highlighted in recent times through the extensive flooding in Victoria and the subsequent damage to road infrastructure. This not only can impact on delivery of pigs to market, but also increases the costs and logistics for acquiring farm inputs like feed. Pork is a key part of the local agricultural supply chain, taking products from local grain producers, dairy processors, food manufactures and other rural services. If there is an interruption to the pork supply chain, this can flow on to these other businesses and cause a wider economic impact. The pork industry is also a key local employer and contributor to rural and regional communities and provides access to fresh, locally produced, high quality protein.

## **6.5 Production of environmentally sustainable protein**

Australian pork is already a low emissions protein. However, the Australian pork industry is committed to continued research to support continual improvement into the future and an increased contribution towards the circular economy.

Australian pork producers and farmers are employing innovative methods to recycle food waste into stock feed, utilise manure for energy production, reduce overall waste and minimise the industry's carbon footprint. Some of our achievements include:

- Over the last four decades, greenhouse gas emissions have reduced by 73%
- Over the last four decades, water consumption for the production of pork has reduced by 80%
- Over the last four decades the industry has reduced fossil fuel use by 58%
- 60% of the pork industry aims to use waste recycling and renewable energy by 2030

The pork industry in Australia demonstrates strong environmental credentials with a low emissions footprint of 3.3 kgCO<sub>2</sub> -e/ kg live weight of pork, a reduction of over 73% since the 1980s. Over 20% of production is currently carried out using biodigesters that reduce methane emissions, with 16% of production completely powered off-grid using piggery by-products and renewable energy technologies. While our environmental story is strong, APL continues to work with industry to significantly increase uptake of emissions reduction technology and manure management opportunities. For example, we are collaborating on a current project supported by Sustainability Victoria and lead by Dairy Australia that is identifying feasible locations in Victoria for co-digestion facilities where wastes from numerous industries can be anaerobically digested and turned into electricity, heat and fertiliser to support those producers who may not have a strong enough feasibility to undertake this practice themselves.

Industry research is also investigating opportunities to reduce waste by maximising the value of non-edible food and agricultural waste as pig food or feedstock to optimise performance of digesters. Ongoing water reduction has also been prioritised, with industry achieving an 80% reduction in usage over the past three decades.

We have also extended investment to include dedicated resources to drive adoption of emissions reduction technologies which has seen good engagement and interest from farmers.

Pork production is already a very circular farming system. Producers are able to take in wastes from other industries, such as off-spec dairy and bakery products and crop waste, that would otherwise be sent to trade waste and feed them to pigs to produce quality protein. From the pork production system, there is also very little true waste. On the farm side, all organic waste can be repurposed. Effluent is collected and spread on land to supply organic fertiliser for crops, while sludges are dried out and often composted for a higher value product for horticultural use. Spend bedding is also composted and able to be used to support plant growth. APL is currently investing in a project to quantify plastic waste generated from veterinary consumables such as artificial insemination catheters and seek options to reduce these waste streams and move up the waste hierarchy.

The industry, through their levy funds, has invested in the development of the National Environmental Guidelines for Indoor Piggeries (NEGIP) and the National Environmental Guidelines for Rotational Outdoor Piggeries (NEGROP) to provide science-based assistance in the planning of piggeries. These guidelines and tools such as PigBal, which calculates the amounts

of manure and effluent produced on a farm, ensure that pig farms are minimising our impacts on the environment and promote the uptake of circular economy principles.

## 6.6 Animal Sentience and nesting material/enrichment

Animal sentience is complex and the definition changes depending on the scientific framework being applied. The Australian pork industry focuses on providing the highest welfare standards backed by robust science, which in turn enables the pigs within our care to live a life free of hunger and thirst and provide a consistent living environment to support pig health and wellbeing.

The benefits of environmental enrichment for intensively housed pigs have been widely reported (Plush and Nowland, 2022<sup>24</sup>; van de Weerd and Day, 2009<sup>25</sup>). Provision of enrichment to sows prior to farrowing has been shown to improve farrowing ease, reduce risky posture changes, and increase maternal bonding and colostrum/milk access. In grower and finisher pigs, the provision of enrichment can reduce aggression and stereotypies, and may reduce the incidence of agnostic behaviours such as tail biting.

Whilst the benefit of enrichment is relatively clear, enrichment materials, if not correctly stored or appropriate for the production system, can lead to poor health and welfare for the pigs. They can also be a potential biosecurity risk. Ongoing research is needed to ensure that enrichment not only meets the needs of the animal but also works in the environment in which the animal is housed and is fit for the purpose of improving positive behaviours (Taylor et.al, 2021<sup>26</sup>).

APIQ✓<sup>®</sup> offers the opportunity to be verified as Option B (Customer Specifications Coles (CSC)) compliant which entails:

- From January 2024, producers verified under APIQ✓<sup>®</sup> Option B be required to provide enrichment to breeder pigs (sows, gilts, and boars), for at least a cumulative one third of the gestation cycle (minimum 30 days) for sows and gilts and for boars who have not been walked in the preceding 72 hours.
- APL has worked with Coles to research appropriate enrichment materials and create resources to support implementation of enrichment by producers.
- These resources are extended across industry, not only to Coles suppliers.

On-farm compliance set in the APIQ✓<sup>®</sup> Standards is verified through an independent third-party auditor. This ensures the integrity of the APIQ✓<sup>®</sup> program. AUS-MEAT is the contracted third-party auditing organisation who conduct independent third-party annual compliance audits of all certified producers.

<sup>24</sup> Plush KJ and Nowland TL (2022), Disentangling the behavioural and fibre influences of nesting enrichment for sows on piglet survival, *Animal Production Science*, 62 (10–11), 957–966.

<sup>25</sup> van de Weerd H and Day JEL (2009), A review of environmental enrichment for pigs housed in intensive housing systems, *Applied Animal Behaviour Science*, 116 (1), 1-20

<sup>26</sup> Taylor P and Lee C (2021), A national framework for effective environmental enrichment for Australian livestock industries, Final Report APL Project 2019/0006, [https://www.awstrategy.net/uploads/1/2/3/2/123202832/final\\_report.\\_an\\_effective\\_enrichment\\_framework\\_for\\_the\\_continual\\_improvement\\_of\\_animal\\_welfare\\_of\\_livestock\\_taylor\\_et\\_al.pdf](https://www.awstrategy.net/uploads/1/2/3/2/123202832/final_report._an_effective_enrichment_framework_for_the_continual_improvement_of_animal_welfare_of_livestock_taylor_et_al.pdf)



## 6.7 Artificial Insemination (AI)

### Artificial insemination process

The sow or gilt before mating is heat detected to determine if they are in oestrus, known as a standing heat.

The scent of a boar (nose-to-nose contact is best) results in a sow standing on heat. Applying a small amount of pressure to the back of a sow mimics the mounting of a boar. Sows will vocalise and move away during the heat detection process if not in oestrus.

A mating saddle can be used to apply pressure, simulating the presence of a mating boar – it is also used to hold the AI catheter during the mating process.

The outside of the sow's vulva should be clean to ensure the AI process is hygienic and does not introduce faecal matter to the reproductive tract.

Once the sow is in standing heat, the AI catheter is introduced to the cervix, a semen tube is attached to the catheter and then is placed in the holder of the mating saddle or other breeding aid equipment.

Once the mating is complete the empty semen tube and used catheter are disposed of.

### Collection process

The whole boar ejaculate is collected in order to maintain a high level of seminal plasma.

The semen quality is then evaluated using lab equipment and diagnostics to assess the motility, morphology and count of normal sperm.

A high-quality extender is used to preserve the semen quality throughout the dilution process.

To make sure that each semen dose contains the minimum number of sperm the diluted ejaculate is mixed well during the filling process of the semen tubes to prevent sedimentation.

Semen doses are then prepared to contain a high amount of spermatozoa.

### Post Cervical Artificial Insemination

Post-cervical artificial insemination (PCAI) is the insemination of sows with a semen deposition beyond the cervix directly into the uterine body.

Unlike above, the presence of a boar during PCAI is not required.

A regular AI catheter is first introduced into the cervix. This catheter then acts as a guide for a thinner cannula which is pushed through the regular catheter and beyond through the sow's cervix.

The semen tube is connected to the cannula and the semen is deposited into the uterine body. It takes a few seconds for the semen tube to empty - Once the mating is complete the empty semen tube and used catheter, along with the inner catheter are removed from the sow and disposed of.

A boar can be left to run in the feed alley or walked in front of the sows after the AI. The stimulation by the boar improves the sperm transport in the uterus of the sow.

The procedure normally takes less time than a regular AI and is commonly used across industry.

PCAI's high efficiency means that the number of sperm and the volume of the mating dose can be reduced.

### **Natural mating**

Matings should be conducted under the supervision of a competent stock-person to prevent aggressive behaviours and injury to boars, sows or gilts.

## **6.8 Transport fit to load (guides and extension activities)**

"Fit for the intended journey" (or "Fit to load") is a respected and well used resource throughout industry. Designed to for easy access at loading facilities and in trucks, the guide is commonplace throughout the fleet of many pig transporters.

APL developed an Exoflare transport App in collaboration with the entire supply chain (pork producers, transporters and processors). In these trials, advanced analytical and machine learning techniques are used to identify animal welfare risk factors during the transport of animals from farm to abattoirs. The key outcome of this research is to reduce heat stress during loading, transit and unloading. The study demonstrated whether and how the collaborative use of data and GPS tracking could help the industry in five areas:

1. Identifying and managing biosecurity risks.
2. Supporting animal welfare practices and monitoring.
3. Implementing zoning and compartmentalisation to protect market access and business viability.
4. Identifying and capturing operational efficiencies.
5. Speeding the generation and provision of records to regulators in emergency animal diseases outbreak situations.

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## Appendix A – The Virtual Tour

- <https://australianpork.com.au/virtual-tour>

# **Appendix B – Producer and other stakeholder submissions and letters of support**

**Submission to the Victorian Government Parliamentary Inquiry into welfare of pigs**

11<sup>th</sup> January 2024

[REDACTED]  
[REDACTED] Producer & Co-owner

I write to you to provide you with an insight into the Australian Pork Industry which has been cast into the spotlight by this inquiry.

Animal welfare is a crucial focus for animal farmers. Every day we focus on caring for the needs of our animals to ensure their welfare needs are met. We are in the business of animal farming because many people in Australia and around the globe enjoy eating safe and healthy nutritious meat products.

Our family has been farming pigs for more than 50 years. We are about to become a 3<sup>rd</sup> generation family business which operates in a regional community in South Australia. I have been working within our family business for 30 consecutive years. During this time, we have increased our family farms to employ nearly 30 direct employees, operate our own Feed Manufacturing plant and built new and modern housing for our pigs to improve the environment for our pigs to ensure they remain well cared for and healthy.

We were one of the earliest adopters of implementing a quality assurance programme on our pig farm which later has become known as APIQ as the Pork Industry quality system. The APIQ system is audited annually by an independent auditor, and we report against this. The APIQ system monitors Animal welfare, food safety, environment, management, biosecurity, traceability, and transport. We comply with not only food safety requirements to supply a range of customers including major retailers, local butchers as well as food service and restaurant suppliers. We also adhere to the Model Code of Practice for Pigs and train our staff regarding good animal welfare and monitor this on a regular basis. We have voluntarily engaged a specialist pig animal health veterinarian to visit our farms on a 6 weekly basis to monitor animal welfare, health and production to ensure we continually provide for all the pigs needs.

We provide significant economic impact to our communities and regions and state. This is similar for pig farmers across Australia. When we employ one person at farm level or within our agricultural business there is a downstream employment of a further 10 people. This downstream employment includes tradespeople and service industry, transport, suppliers of products and processing. The economic impact has been calculated to be a factor of 6-7 times for every dollar generated at farmgate this is significant for the national economy. As an end-user of grains and commodities we support many grain farmers within our state and region and offer them another alternative market to sell grains into.

Our family business for decades has provided financial and other support to local schools, churches, and sporting clubs. We have sponsored numerous families on skilled working visas to migrate to Australia and sponsor their children who are involved in local schools and universities and sporting clubs. We are genuinely changing their families lives and providing future generations with opportunities that are amazing!

As a private family business, we have invested large sums of capital to improve our operations for the future with a view towards sustainability. For 50 years we have been using animal manures on our horticultural operations to assist with providing the nutritional requirements to grow other food crops which has included, citrus, olives, grapes, stonefruit, vegetables among others. For over 20 years we have been composting all our spent animal bedding to create a friable, odourless composted fertiliser for use within our own farming systems and re-sale to other farmers for wine grape, citrus, grain, vegetables (including potatoes, onions, pumpkins) and olive production. This is a truly sustainable loop where waste is recycled, and value added. We have also installed a large solar array to directly offset our entire daily pig farm power requirements (during daylight hours). We have invested into infrastructure to reduce water use and we monitor all our inputs, outputs and daily operations using technologies that offer remote control as well as real time control for the environment of the pig. We control the pigs environment within their housing to provide a comfortable environment with warmth during winter and cooling during summer. This allows the pigs to be cared for in a manner that we are truly proud of.

Activism involving trespass is an illegal activity and risks biosecurity, quarantine breaches and is a safety danger to visitors not familiar with farm systems, machinery and activities. The emotional damage and mental health concerns from producers targeted by illegal entry to farms is something that is causing some producers to leave the industry, others to suffer severe mental health issues even contemplating suicide. This issue is serious and the end should not justify the means! Many of my farming colleagues all live on their farms with their children and other families, they should not wake up in the night concerned about trespass from vigilante groups.

The timing of this enquiry is disruptive to farmers who as animal carers look after their animals 365 days per year. We don't close the farm for 2 weeks over Christmas and New-Year like an accounting firm might, we care for and check on our animals multiple times daily and include extra checks during hot weather or storm events.

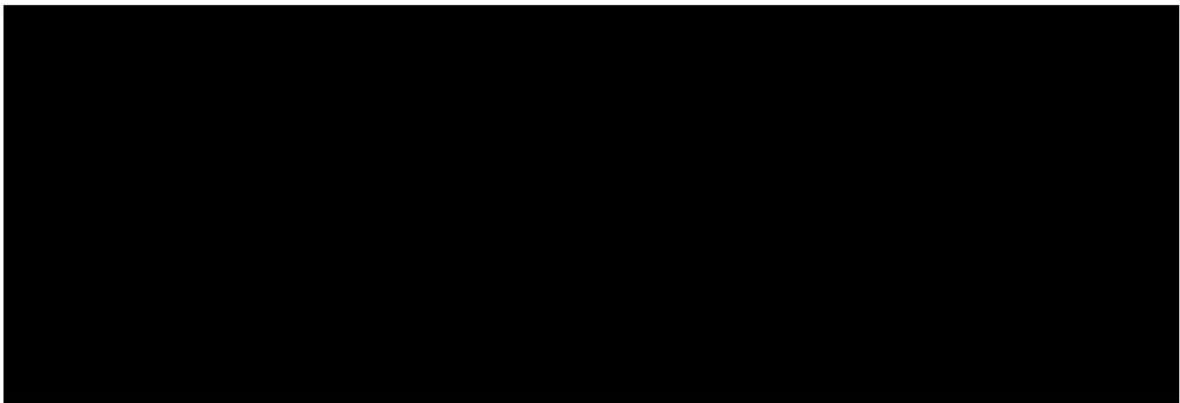
I would welcome a genuine discussion and review around animal welfare that is not driven by protagonists toward animal farming or those who have publicly stated views on closing down farming or animal meat consumption. This is a genuine conflict of interest and should be treated as such. The Australian pork industry has moved away from confinement for gestation voluntarily many years ago and Australian Pork Ltd invests in welfare research to further improve animal welfare outcomes. The changes to gestation accommodation cost industry significantly in terms of capital and productivity for several years without any support from government. This significant effort should not be forgotten or ignored rather applauded and reinforces the pro-active industry that the Australian Pork industry is.

I request that you support an industry that supports animal welfare, supports local communities and supports the Australian economy by providing safe quality Australian pork for consumers.

Yours Truly,







9<sup>th</sup> January 2024

## Victorian Parliament

Dear Committee Members

### **RE: The Economic and Infrastructure Committee Submission to Victorian Parliament Inquiry into Farmed Pig Welfare**

My name is [REDACTED] the Piggery Director of [REDACTED] [REDACTED] and Director of [REDACTED] [REDACTED]. A delegate of [REDACTED] and former committee member and Vice President of the VFF Pig Group.

The [REDACTED] have been residents of the Windermere district since 1921. The original 130 hectares was purchased and named [REDACTED] by my Great Grandparents. Over the next 40 years the farm increased to 323 hectares, running dry sheep and growing barley and oat crops. In 1973, the farming company [REDACTED] [REDACTED] was formed. Five properties including a pig Grow-out has since been purchased, total area presently farmed 1105 hectares.

The [REDACTED] piggery was established 55 years ago with humble beginnings of one sow. The piggery has been remodelled and upgraded at different times in to an efficient 2000 breeding sow, farrow to finish pig unit. Remodelling has included Eco-shelters to assist with All-In and All-Out production systems, Farrowing and Freedom pens with trail work from Melbourne Uni and a Grow-out, Grants purchased for increased production efficiencies and sale weights. We were involved in a pig Vaccine company AusVac in the 1980's for an E.coli vaccine for pigs. It is still produced and sold today by MSD Animal Health, Bendigo. Better Welfare for pigs and staff, Health (including Biosecurity), Nutrition, and Management are the pillars of the company's Ethos.

We have never had gestation sow stalls in the piggery, I figure we were in pigs well before these were invented and believed our open pen system was suffice and it is interesting how the Industry has done a full circle!

The Farm has a computerised feed mill producing over 250 tonnes of feed per week required by the pigs. Annually up to 600 hectares are sown to Winter Barley, Canola and Wheat on Company and leased land. 2500 composite ewes run on the remaining 495 hectares. In the early 1990's a Total Waste Management System was research and developed and has been acknowledged worldwide and has received praise from authorities such as the E.P.A. and Renewable Energy Society. The plant converts effluent from the piggery into electricity, the by-product organic fertilizer is used to promote crop growth and a garden products division a key supplier of premium quality potting mixes and soil conditioners throughout New South Wales, Victoria and Tasmania.

I have spent the last 35 years in the Pork industry and prior doing Agriculture/Pig studies in Australia and the United Kingdom. I have learnt that welfare and pig production go hand in hand. Efficient and productive herds have great Welfare Standards. The staff on our farm are trained in-house and externally – Certificate 3 in Pork Production or Diploma of Ag specialising in pigs, which includes Prohand (a course regarding stockpersons attitudes toward Welfare and the teaching of handling and moving pigs). Everyday we are doing positive actions for the pigs, without even knowing it. Ensuring they have palatable feed, clean drinking water, shelter, fans and misters for Summer, heat lamps and heaters for Winter. Thermostat controlled sheds all year round. Providing saw dust and straw as bedding, chains and containers attached to chains for the pig's amusement. Even a scratch or a pat as you're walking past a pig that is curious enough to get your attention!

Once the progeny leaves the farm it is also good know that we are providing nutritious, affordable high quality protein on the table for Australian families. Meat that shows no signs of stress and a longer shelf life. Pig sales go locally and domestically to Butcher Shops, Supermarkets and exported to Singapore to smaller chain Supermarkets. Australian APIQ standards assisting with the clean green image of Australian pork to create this market in the last 12 months.

In the early 1990's we chose to get Quality Assured. Safe Quality Food (SQF) which mainly looked at food safety. Now days we have the APIQ Industry Program. This includes standards to comply with management practices, biosecurity, transport, welfare, environment and traceability through food safety. Last year our Grants Piggery was accredited for VEBS (an optional Biosecurity measure). Welfare or the model Code of Practice is audited annually by the APIQ auditor and our contracted vet upon every visit 6 weeks apart. Nutritionists' visits at least quarterly, comparing different seasons grain purchased which we test for energy, protein and mycotoxins. Discuss availability of animal and plant proteins, growth rates of stock and reproduction performance. Like welfare, nutrition has a big bearing on performance.

We keep up to date with the latest trends and pig news by Australian and abroad presentations and publications. The Australian Pork newsletters, which comes out weekly is a great reference for staff to reiterate current news. Ben Linn our vet from Vet and Stock Consulting Pty Ltd also keeps us up to date with Industry new findings.

Above all, this is a result of the consistent enthusiasm and loyalty of the 50 staff who make up [REDACTED] I'm proud of the fact that we support 50 families, adding to the Ballarat and surrounds economy not to mention the local businesses we support.

I do not want to see these employees mentally or physically harmed or stressed because of activists breaking in to our private property and their work place endangering their safety. Not to mention the pigs, potentially bringing disease when we work so hard keeping it out.

Pig Welfare is of critical importance to our business both from an ethical and a commercial perspective. As such we have invested in farming our pigs in a humane way which meets industry welfare standards. We are committed to raise our pigs in a humane, welfare-friendly and further interventions by the committee are not necessary.

Should you have any questions or require further information, please don't hesitate to contact me on [REDACTED]

Yours sincerely

[REDACTED]  
[REDACTED]  
Director  
[REDACTED]



Piggery Owner and Manager, Proud Australian Farmer of Pigs and Beef Cows.

I write as a committed pork producer.

As a farmer who loves what I do, I believe it is crucial to share my perspective on animal care in this Inquiry into Pig Welfare. Every day, I work to care for our pigs and our people. I understand the responsibility that comes with caring for and rearing pigs. I'm also proud to put a nutritious, versatile, affordable and high-quality product on the table for Australian families.

Animal care is at the core of my operations. I do everything to embrace the best research and development practices and put them in place on my farm.

I am proud that Australian farming practices are recognised as some of the most advanced and regulated in the world. And internally we believe we are leaders in pig farming within Australia.

I know that Australian Pork Limited has invested \$23 million in over 60 separate projects that focus on animal welfare and care of our pigs over the last decade. I've put in place learnings from these projects on my property – for example, we have completely rebuilt our gestation housing using group housing and state of the art ear tag system which allows the perfect amount of feed to sow at the right time and also notifies us of pigs that aren't eating adequately.

My farm – and the sector as a whole – is one of the most heavily audited and regulated industries in agriculture. I continually go above and beyond the Model Code of Practice for the Welfare of Animals and my farm is regularly independently audited to ensure I hit these standards. I also run an APIQ® accredited farm, meaning I can give my customers assurance of the standards that are in place on my operation. I must adhere to seven core standards across Food Safety, Animal Welfare, Biosecurity, Traceability, Environment, Transport and Management. All our staff must also comply with strict animal handling and pig welfare measures while at work. They have access to best-practice training resources, including ProHand modules.

I also know that raising a healthy pig is not only the right thing to do, but it's good business. It means a higher quality pork for customers.

Beyond pig care, I'm proud to be part of an industry that makes such a positive contribution to Victoria and Australia. The pork industry significantly contributes to the economy and local employment. For instance, my farm supports local community clubs which operate in rural communities with a low number of business support.

Australian pork's recognition as a low emissions protein aligns with global efforts to promote sustainable and environmentally friendly food sources. We consistently adopt new measures to enhance sustainability, emphasising our dedication to innovation and improvement – Recently our own piggery is proud to have invested substantial time and finances into a biogas and power generation system that uses pig effluent to generate twice the power the farm needs. Exports the excess back to the grid. Destroys greenhouse gas which would otherwise be emitted from the

piggery. And also reduces odour from the farm by up to 75%. Since 1980, as a whole the pork industry has reduced its carbon footprint by more than 73 percent and water use by 80 percent.

I want to finish by referencing the mental wellbeing of my family and staff. The challenges we face, including attacks, night time break-ins, and threats, compromise not only the safety of our people but also the wellbeing of our pigs. We respect the right to protest but emphasise the importance of ensuring that such actions do not endanger the safety of individuals or animals.

On our farm. Several previous break-ins have been particularly distressing. With Staff and tenants in houses on the farm suffering considerable anxiety post break-ins.

As a piggery owner I have been forced to consider biosecurity breakdowns during break-ins. Previously our farm has broken with diseases within our herd in the months following break-ins. Which makes me wonder if activists visiting numerous farms in the same week. Could be the cause of pathogens being transferred from another farm into mine.

This current behaviour, deemed illegal and threatening, demands immediate action – it's just got to stop. Lawbreakers must be held accountable for their actions.

I'm proud to be part of an industry that prioritises pig care. I'm proud to work in an industry that contributes \$5.5 billion to the national economy and supports 31,000 jobs. I'm also proud that pork is the second most consumed protein in Australia. It shows we are doing our job well. I hope you will consider our commitment to pig care. I ask for your support, allowing us to get on with providing affordable high-quality pork, produced with animal care at its core.

Sincerely,

[Redacted signature]

[Redacted contact information]

10/1/2024

[REDACTED]

Pork Producer

I am a committed pig farmer. I employ 5 local farmers to help me produce a fantastic Australian product which is sold throughout Australian butchers and supermarkets. I believe it is important that I make a submission making it clear that as an Australian Farmer I support ethically farming pigs for our country and the majority of people who love eating bacon.

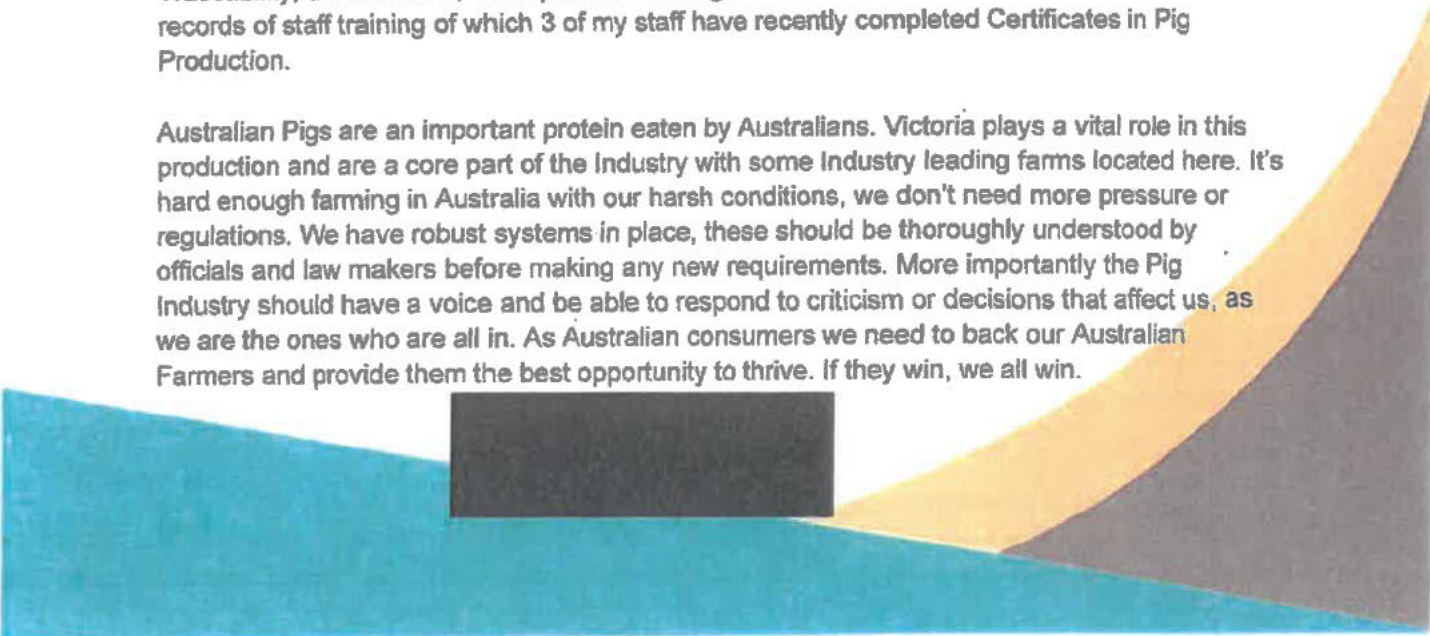
I began this enterprise 3 years ago as a 35-year-old with the help of a few other local farmers. I moved from one side of Australia to the other with my wife and 5 kids to be the Managing Director of a brand-new pig farm that produces around 7000 pigs/year. Having built this farm through covid and weathered the storm of Japanese Encephalitis, I and my pigs have experienced some adversity but I am grateful to have the responsibility of farming them.

I have been farming pigs (on and off) since I was 18 and I love it. I have saved over that 20 years and have put most of my savings into this piggery that I built and part own. I am all in. I love pigs, I love eating them and I love producing them in a way that I can be proud of. To produce a healthy, lean and fast-growing pig you need to give that pig a great environment in order to thrive. I have built a farm that balances that performance with the animal's welfare at the forefront of my decisions. **Activists would still find fault with it but the fact that I farm is the fault, not how I do it.**

Our Industry on the whole provides safeguards to these animals in the form of annual APIQ Audits, Model Codes of conduct and Veterinarian Health checks/inspections. The Pig Industry is a heavily regulated Industry, APIQ certification is a thorough framework which ensures that animals are being farmed in accordance to Industry Code. My farm and every Pig farm I know is APIQ certified, it comes at a cost, time and dedication, but it's a great system. APIQ certification is made up of seven core standards across Food Safety, Animal Welfare, Biosecurity, Traceability, Environment, Transport and Management. Included in the APIQ standards are records of staff training of which 3 of my staff have recently completed Certificates in Pig Production.

Australian Pigs are an important protein eaten by Australians. Victoria plays a vital role in this production and are a core part of the Industry with some Industry leading farms located here. It's hard enough farming in Australia with our harsh conditions, we don't need more pressure or regulations. We have robust systems in place, these should be thoroughly understood by officials and law makers before making any new requirements. More importantly the Pig Industry should have a voice and be able to respond to criticism or decisions that affect us, as we are the ones who are all in. As Australian consumers we need to back our Australian Farmers and provide them the best opportunity to thrive. If they win, we all win.

[REDACTED]



**LETTER OF SUPPORT****Name:** [REDACTED]**Role: Ex producer and VET Trainer and Assessor**

As a pork producer and an experienced trainer and assessor I feel quite passionate about the industry, its people and sustainability. I feel it is crucial to share my perspective on animal care in this Inquiry into Pig Welfare and to provide strong support for Victoria's pig farmers.

I, like all in the pig industry, share a dedication and commitment to animal welfare and care. In fact, without this dedication, our pigs would not thrive and our peoples' safety would be at risk. Furthermore, the prosperity of our farms and the pork industry would be affected. We are pork producers with a commitment to produce a quality, nutritious, affordable and high-quality protein product for domestic and export consumers. To achieve this, it is imperative that we provide a high level of care and welfare to our stock.

For 26 years; rain, hail or shine, whether it was a public holidays or special event, we were there to care for the health and welfare of our pigs. It is a commitment we readily accepted as owners of a family run piggery. Everyone in the livestock industry, and even more so in the pig industry, understands the responsibility that comes with caring for and raising their stock.

Being a piggery stockperson requires a range of skills and knowledge and the ability to maintain the health and welfare of our pigs is one of the key skills. I have been a trainer and assessor for 20 years and deliver nationally accredited training to multiple pork producing enterprises in Victoria and NSW with my key focus on the health, safety and welfare of the pigs and people on farm. I find it really important that I liaise with industry and farm management, always remaining current with domestic and international developments so as I can include this information in all my training programs.

Piggery workers require an understanding of the pigs in their care, their needs and the expectations of the piggery enterprise in regards to welfare. All farms have an expectation that staff comply with strict animal handling and animal welfare measures while at work and they must participate in all training opportunities, whether formal or informal to assure that the best welfare practices are met and maintained. I find that industry and all piggery management see the benefit and value of a trained work force.

APL and industry developed the Pork Industry Stockperson Skill Set as the minimum standard of training for piggery staff in 2009 with AHCSS00010 - Pork Industry Stockperson

**LETTER OF SUPPORT**

Skill Set (Release 1) released 2011 by Training.gov. I was privileged to be part of the panel contributing to this skill set.

Although the skill set is the minimum requirement, farm management continually choose to go a step further by enrolling their staff in a Certificate III in Pork Production. In all cases the managers and leaders support their people throughout the training program with the sole purpose of gaining competent and skilled piggery attendants to care for their stock.

Being a livestock farmer in Australia means working in one of the most heavily audited and regulated industries. It also means embracing the best research and development practices and putting them into practice on farms. The pork industry is constantly researching, developing and implementing new techniques and welfare conscious practices.

The farms I train at are actively implementing best practice and industry advancements. They encourage their people to identify ways to contribute and improve on farms practices. These farms can be small or large. Their people live and contribute to their local communities and economies, as do the farming operation. Some communities and schools rely on piggery worker families to stay viable.

There are many challenges that primary producers encounter, often with a feeling of helplessness and mental angst. Across Australia, farmers face ongoing natural disasters, skills shortages and financial burdens. For piggeries there is the added stress due to the worry of, or actual occurrences of farm trespass, harassment and threats. The profound and ongoing impact this has on the mental health and wellbeing of every person who works in and with our industry needs to be recognised.

We are lucky to live in Australia, with the freedom to make our own decisions and life choices. We respect the right to protest and have different ethical beliefs but these should never impact others, mentally or physically, nor endanger the safety of individuals or animals.

We were always proud to be pork producers and I take my role as a trainer and assessor very seriously. I am proud to deliver training to stock-people in an industry that contributes so strongly to the local and national economy. I am even prouder of the care and respect these workers have for the pigs under their care.

I stand alongside Victoria's pig farmers and their dedication to animal care and welfare.

Sincerely,





Name: 

Role in the industry: Owner manager, 42 Years in the industry.

I write as a committed pork producer. As a farmer who loves what I do, I believe it is crucial to share my perspective on animal care in this Inquiry into Pig Welfare.

Every day, I work to care for our pigs and our people. I understand the responsibility that comes with caring for and rearing pigs. I'm also proud to put a nutritious, versatile, affordable and high-quality product on the table for Australian families.

Animal care is at the core of my operations. I do everything to embrace the best research and development practices and put them in place on my farm. I know that Australian Pork Limited has invested \$23 million in over 60 separate projects that focus on animal welfare and care of our pigs over the last decade. I've put in place learnings from these projects on my property – for example, Animal Stress levels with human interaction, Feed Balancing, Effluent worksops, Renewable energy Sources and Sustainability.

My farm – and the sector as a whole – is one of the most heavily audited and regulated industries in agriculture. I continually go above and beyond the Model Code of Practice for the Welfare of Animals and my farm is regularly independently audited to ensure I hit these standards. Not only by Industry but by our marketing group.

Our industry were innovators with Sow Stall Free production which we worked closely with retail to give consumers confidence of our change to better pig welfare. In my time involved in pig production, 42 Years, I have seen a huge change in attitude and practices for better welfare outcomes for Pigs.

I also run an APIQ® and Coles accredited farm, meaning I can give my customers assurance of the standards that are in place on my operation. I must adhere to seven core standards across Food Safety, Animal Welfare, Biosecurity, Traceability, Environment, Transport and Management.

All our staff must also comply with strict animal handling and pig welfare measures while at work. They have access to best practice training resources, including ProHand modules.

I also know that raising a healthy pig is not only the right thing to do, but it's good business. It means a higher quality pork for customers.

Beyond pig care, I'm proud to be part of an Industry that makes such a positive contribution to my Community, Victoria and Australia.



The pork industry significantly contributes to the economy and local employment. For instance, my farm supports Local sport, Health centres and local shops. Australian pork's recognition as a low emissions protein aligns with global efforts to promote sustainable and environmentally friendly food sources.

We consistently adopt new measures to enhance sustainability, emphasising our dedication to innovation and improvement – over the last two years, our farm has implemented renewable energy through solar and Biogas. Since 1980, the pork industry has reduced its carbon footprint by more than 73 percent and water use by 80 percent.

I want to finish by referencing the mental wellbeing of our staff. The challenges we face, including attacks and threats, compromise not only the safety of our people but also the wellbeing of our pigs. We respect the right to protest but emphasise the importance of ensuring that such actions do not endanger the safety of individuals or animals. For my workers, the risk of our high Biosecurity being breached and dealing with the possibility of high mortalities due to introduction of a new disease have been particularly distressing.

This current behaviour, deemed illegal and threatening, demands immediate action – **it's just got to stop**. Lawbreakers must be held accountable for their actions.

I'm proud to be part of an industry that prioritises pig care. I'm proud to work in an industry that contributes \$5.5 billion to the national economy and supports 31,000 jobs. I'm also proud that pork is the second most consumed protein in Australia. It shows we are doing our job well.

I hope you will consider our commitment to pig care. I ask for your support, allowing us to get on with providing affordable high-quality pork, produced with animal care at its core.

Sincerely,

[Redacted signature]

[Redacted contact information]

[Redacted contact information]

To Whom it May Concern,

The first thing I would like to say is the unfairness of the timing of this inquiry, the absolute short notice given of its planned inquiry, and the unqualified people on this inquiry that have been thrown together to try to make decisions that they are not qualified to make both being scientific and plan old commonsense.

We note that this inquiry is taking place against a backdrop of ideological activism and illegal activity that threatens the safety and security of us, our workers and our pigs. All Bio Security is broken with absolutely no thought to the ramifications. Our pigs are terrified, as these cowards always break in at night with no concerns of the welfare of our pigs at all.

It is definitely not acceptable that I am attacked for doing my job. We should never ever feel threatened in any workplace. The multiple times we have had to get Police escorts into the abattoir to protect our truck driver is totally unacceptable, and the biggest waste of Police officers that have been taken away from what the Government employs them for. They are not security guards. The illegal activists are a vocal minority, and yet they have been able to speak directly to policy makers. Please explain?

I could write pages and pages of what we do on a daily basis in our piggery, but I am sure you are not interested in the passion we have for our pigs, and the financial hardships we endure, because like all farming we never get paid fairly for our produce. You would not care that we have massive overdrafts so our workers can pay their mortgages and feed their families.

We are Apiq accredited and stand firmly behind the Model Code of Practice and Apiq. We are audited once a year, and in 24 years we have always passed with flying colours, our Auditors love coming here, and are welcome any day of the week. Our pigs are and always have been an Absolute Top Priority to every person that works here.

I do not need to remind you of the \$5.5 Billion to the National Economy and supports 31,000 jobs, and Pork is the second most consumed protein in Australia, but of course you would already know that wouldn't you.

All I am asking is for a fair go, and a fair playing field, which we are not being given. It is an absolute disgrace to be guided by emotionally driven illegal activists that are trying to stop farming of all description including sheep cattle. Lives have been put at risk, and frankly we are totally sick to death of them. Enough is enough.

Regards



Name

Role:

University of Sydney

Sydney School of Veterinary Science, The University of Sydney

SUBMISSION NO. 543

As an academic in the Sydney School of Veterinary Science who works with production animals, I am keenly aware of the animal welfare challenges that face producers in these fields. I therefore am writing to share my perspective on the situation in animal care, to be considered in the current Inquiry into Pig Welfare.

Throughout my 20+ years working alongside the pig industry, I have been inspired by the commitment and care that the farmers and industry more broadly shows to their animals. It is well recognised across livestock industries that there is a responsibility that comes with caring for and rearing animals, but there is also an economic benefit to raising animals in a high welfare state that adds to the drive for producers to care for their animals.

The pig industry in Australia is highly responsive to research outcomes and promptly adopts best practice to an extent that I have not observed in comparable industries internationally. They have imposed staff training and welfare measures upon workers, creating a high quality training program to ensure knowledge of best practice is disseminated widely. Additionally, the industry funds research into continual improvement of practices in terms of welfare and more broadly.

While I respect the right for community members to hold and air opinions on any topic, it is important that this is done in a way that does not compromise the safety and well being of other people or animals. The consequences of protestors trespassing on biosecure properties has the potential to not only adversely impact staff, but also the animals housed on the property and livestock industries and food security as a whole when biosecurity perimeters are compromised. For these reasons, immediate action must be taken to stop this illegal behaviour and lawbreakers must be held accountable for their actions.

Sincerely,

[Redacted Signature]

[Redacted Contact Information]

Sydney School of Veterinary Science, Faculty of Science, The University of Sydney



## Livestock Environmental and Planning

26<sup>th</sup> December 2023

Re: Victorian Parliamentary Inquiry into Pig Welfare

Name: Robyn Tucker

Role: Pig Farm consultant

As a consultant to the Victorian pork industry, I regularly visit pig farms and speak frequently with many farmers. It is obvious from these communications that the farmers like their animals and are committed to providing the very best care for them. These farmers also understand that providing good care to the pigs is integral to good productivity. Providing sub-optimal welfare outcomes makes no sense. Welfare is not the only area where pig farmers excel. The industry has also made a concerted effort to be environmentally sustainable and is a leader in the GHG emissions space, having reduced emissions by 73% over the past forty years.

Australian Pork Limited (APL) supports farmers in their care of the animals by funding and managing ongoing research into production systems that provides for continual improvement in animal welfare, care and housing. All farmers must operate their farms in accordance with the *Model Code of Practice for the Welfare of Animals – Pigs* and other applicable welfare standards. Many farmers participate in the Australian pig industry quality assurance scheme, APIQ✓®. APIQ✓® includes a whole module on animal welfare that is based on the *Model Code of Practice for the Welfare of Animals – Pigs*. APIQ✓® is independently audited, ensuring that participating farmers always meet or exceed the expected national welfare standards.

Importantly, the Victorian pork industry is a significant part of the Australian industry, with pigs processed in Victoria representing nearly a quarter of national production. The industry also contributes significantly to the Victorian economy adding some \$1.38B, including 527M (value added) from the farm sector, in 2022-23. The pork sector makes this contribution in a welfare-friendly way.

While all citizens have the right to express their views, illegal activities by activists should not be condoned. Across Australia, farmers face ongoing occurrences of farm trespass and harassment. These activities compromise the safety, welfare and biosecurity of the pigs and the mental health of the farmers who care for them. These activist lawbreakers must be held accountable for their actions in a serious way. It is wrong that a vocal minority appears to have the ear of policy makers.

The Victorian Parliamentary Inquiry into Pig Welfare is an unnecessary waste of taxpayer money when Victorian pig farmers are passionate about providing excellent animal welfare outcomes and already operating to a high standard in this regard.

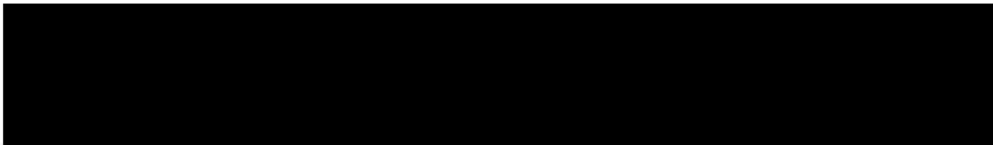
I am proud to be part of an industry that makes animal welfare a priority.

I stand alongside Victoria's pig farmers and their dedication to animal welfare and care.

Kind regards



Robyn Tucker  
Principal Consultant



**Enpro Envirotech Pty Ltd**ABN: 41 611 757 763

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LETTER OF SUPPORT

09.01.2024

**Name: Dr Jayant Keskar****Role: Founding Director and CEO Enpro Envirotech Pty Ltd**

I write as a CEO of Enpro Envirotech Pty Ltd. As a CEO, it is crucial to share my perspective on animal care in this inquiry into Pig Welfare and to provide strong support for Victoria's pig farmers.

I know a few Piggery farmers; they share a dedication and commitment to animal welfare and care. I have worked with these farmers for assessing on how best they can reduce the environmental impacts of their activities on the environment. Everyone in the livestock industry understands the responsibility that comes with caring for and rearing pigs. They are all also proud to help put a nutritious, versatile, affordable and high-quality product on the table for Australian families.

Being a livestock farmer in Australia means working in one of the most heavily audited and regulated industries. It also means embracing the best research and development practices and putting them in place on farms which includes quality control, GHG emission reduction etc. All staff must comply with strict animal handling and animal welfare measures while at work and access to best-practice training resources. They – like everyone in the sector – knows that animal welfare is not only a non-negotiable but makes good business sense as well. More broadly, I'm proud to be part of an industry that makes such a positive contribution to Victoria and Australia.

The pig industry significantly contributes to the economy and local employment. They consistently adopt new measures to enhance sustainability, emphasising our dedication to innovation and improvement for example implementing renewable energy generation, reducing carbon footprint etc.

I want to finish by referencing the mental wellbeing of producers. Across Australia, farmers face ongoing occurrences of farm trespass, harassment and threats. The profound and ongoing impact this has on the mental health and wellbeing of every person who works in and with our industry needs to be recognised. The continued ideological activism and the illegal activity of activists compromise not only the safety of our people but also the wellbeing of our animals. We respect the right to protest but emphasise the importance of ensuring that such actions do not endanger the safety of individuals or animals.

I'm proud to be part of an industry that prioritises animal welfare. I'm proud to work in an industry that contributes so strongly to Australia's economy. I stand alongside Victoria's pig farmers, their dedication to animal care and their work.

Sincerely,



(Dr Jayant Keskar)  
Founding Director and CEO



10 January 2024

Parliament of Victoria  
Economy and Infrastructure Committee  
Parliament House, Spring Street  
East Melbourne VIC 3002

Correspondence via email: [pigwelfareinquiry@parliament.vic.gov.au](mailto:pigwelfareinquiry@parliament.vic.gov.au)

Dear Committee,

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

On behalf of the National Farmers' Federation (NFF), I am writing to provide a letter of support for Australian Pork Limited's (APL) submission to the Victorian Parliament's Economy and Infrastructure Committee's inquiry into pig welfare in Victoria (Inquiry).

The NFF is the voice of Australian farmers. The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and length of the supply chain. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF stands firmly in support of the Australian pork industry and the farming families that live and work within it. The Australian pork industry is a crucial industry not just to regional communities but to the Australian economy, generating nearly \$6 billion in economic value and supporting over 35,000 jobs nationally. The industry is no doubt of similar importance to regional and metropolitan Victoria.

The NFF views the health and well-being of animals as being entrenched in Australian agriculture. Producers across the country have a steadfast commitment to raising animals in accordance with world-leading standards and guidelines, as well as seeking continuous improvements in welfare outcomes by investing hundreds of millions of dollars for projects, systems and research activities related to animal health and welfare.

The Australian pork industry similarly demonstrates this unwavering commitment to welfare outcomes within its industry. Pork producers operate under world-leading production & welfare standards and regulatory frameworks, both on-farm and throughout their value chain. Beyond these minimum standards, the pork industry has proactively developed production assurance programs, set targets and regularly reports on animal welfare outcomes.

Such industry-led efforts are not only important means to support continuous improvement throughout the supply chain, but are critical to demonstrating the sector's commitment to animal welfare outcomes and sustainable production systems in order to maintain the trust of consumers and the wider community.

In conducting its Inquiry, it is critical that the Committee thoroughly considers these world-leading welfare frameworks, standards and regulations that underpin safe and humane production within the pork industry, as well as the ongoing efforts taken by the industry to deliver continuous improvement. To this end, we urge all members of the Committee to consider the APL submission which outlines these matters in further detail.

In providing this letter of support, it would be remiss not to also note the extreme concern felt by producers across the country with respect to the current actions of activists on farms and other agricultural facilities. These acts, too often masquerading as animal welfare activities, are indeed anything but, and constitute intimidating trespass and occupation of private homes and businesses.

In recent times no agricultural industry has more acutely felt the impacts of such behaviour than the Australian pork industry. Not only does the occupation of pork farms and production facilities create genuine safety risks for farmers, their families and staff, it can have direct and significant impact on the welfare of livestock.

We remind the Committee that in some cases the behaviours being lauded by some as welfare 'activity', are in fact in direct contravention of State and Commonwealth law. The Committee should consider the impacts of such behaviour on producers and the welfare of animals, as well the legal and law enforcement remedies available to prevent it, as part of this inquiry.

In concluding, the NFF sees it as incumbent upon the Committee to recognise the world-leading production standards which underpin the welfare outcomes in the Australian pork industry, as well as its unwavering commitment to continuous welfare improvement. To this end, significant weight should be given to the submission made by APL, which is best placed to provide input informed by robust evidence and scientific underpinnings.

Failure to do so risks the Inquiry being misinformed by ideologically-motivated and vexatious claims aimed not to support animal health and welfare outcomes, but to shutter the industry and the families working and living within it.



Should you require further information, please do not hesitate to contact me at cthomas@nff.org.au or at (02) 6269 5666.

Yours sincerely,



**Charles Thomas**  
Acting Chief Executive Officer

