

Submission
No 22

**INQUIRY INTO PREVENTION OF CRUELTY TO ANIMALS
AMENDMENT (RESTRICTIONS ON STOCK ANIMAL
PROCEDURES) BILL 2019**

Organisation: Australian Pork Limited

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Australian Pork Limited
ABN 83 092 783 278

PO Box 4746
Kingston ACT 2604

P 02 6285 2200
F 02 6285 2288

www.australianpork.com.au

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The Hon Mark Banasiak MLC
Chair
Portfolio Committee No. 4 – Industry
Legislative Council
Parliament House
Sydney NSW 2000

By email: portfoliocommittee4@parliament.nsw.gov.au

Dear Chair

Inquiry into the Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019

Australian Pork Limited (APL) welcomes the opportunity to provide a submission to the *Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019* (the Bill).

APL is the peak national representative body for Australian pig producers. It is a producer-owned company combining marketing, export development, research and innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry. The Australian pork industry employs more than 36,000 people in Australia and contributes \$5.3 billion in gross domestic product to the Australian economy.

APL does not support the Bill to mandate pain relief for castration, ear tagging or branding/tattooing. Pigs that are raised in a production environment require efficient and effective husbandry procedures to ensure good health and welfare and prevent disease or injury. These procedures include ear tagging or tattooing which supports traceability for biosecurity, or castration to prevent aggression in male pigs.¹ Changes to legislation without any reference or understanding of pig behaviour, animal welfare science or production realities will not achieve long term animal welfare outcomes.

Australian pork producers understand that the provision of good animal welfare results in a contented animal able to adapt to its environment. The industry invests significant funds each year to research new technologies and practices to improve pig welfare and provide valuable education and training to stock people throughout Australia. This research informs industry practices and the regulations that underpin them, including the appropriateness and efficacy of pain relief.

Australian producers approach animal welfare from a long-term perspective, seeking to ensure that a perceived short-term benefit does not compromise long term health and welfare, which this Bill would. To illustrate this point, a UK study on the use of anaesthetic prior to castration caused piglets to have poorer suckling activity in a vital

¹ Rydhmer, L., Lundström, K. & Andersson, K. 2010. Immunocastration reduces aggressive and sexual behaviour in male pigs. *Animal*, 4, 965-972.

stage of their development, causing reduced health and welfare outcomes.² This example clearly shows the danger of applying generic pain relief requirements across the livestock sector, which can result in unintended consequences.

Other husbandry procedures, such as the tattooing or ear tagging of pigs, is undertaken to improve traceability and reduce the spread of disease that negatively impact pig health and welfare. The nature of these procedures makes pain relief both unnecessary and impractical. Firstly, the swift application of both procedures renders pain relief unnecessary, and in the case of tattooing, is not as invasive of an intradermal syringe which would be the basis for delivering any anaesthetic. Secondly, the timing of tattooing and ear tagging is immediately before transport to reduce the risks of ear and flank damage caused through biting of other pigs. Were pain relief to be mandated, food safety regulations would enact a Withholding Period (WHP) and require bringing forward this identification procedure, exposing pigs to potential stress and injury outlined above. This process would also increase the incidents of handling which may impact welfare outcomes.

The Australian pork industry is continuously improving animal welfare outcomes through research and development and applied veterinary medicine. The current regulated animal welfare requirements are informed by the *Model Code of Practice for the Welfare of Animals: Pigs* (Model Code). This document is currently being reviewed, to be replaced by the *Australian Animal Welfare Standards and Guidelines: Pigs* (SnG's). In ensuring that these updates reflect the latest science, APL has invested in a science review that informs drafters of the SnG's of the latest global welfare research available on pigs.³ This review has recommended that industry continue to look at non-invasive pain relief options to avoid excessive handling requirements, which has stress implications for the animals. Industry will be considering these factors in developing the new SnG's.

Whilst the Model Code enshrines the minimum standards, the Australian pork industry often exceeds these minimum requirements. As an example, the Model Code states that pregnant sows must not be housed in a sow stall for more than six weeks of any gestation period. The Australian pork industry is voluntarily phasing out the use of gestation stalls and today around 80 per cent of sows are housed in groups from one day after mating until one week before farrowing.

APL supports the advancement of animal welfare research, including research that seeks viable alternatives to husbandry practices that consider the welfare of pigs throughout their lives. APL further welcomes legislation that codifies and regulates the latest Model Code and SnG's. APL does not, however, support the blanket introduction of laws that prioritise perceived short-term gains of welfare while jeopardising longer term animal welfare, including disease risk, particularly where scientific rigour has not informed changes in the legislation. The proposed Bill seeks to place community attitudes and uninformed welfare positions above scientific and peer-reviewed research.

Australian pork producers are world-leading in their attitude to animal welfare and regularly find ways to improve their systems independently and in advance of any regulatory requirements compelling them to do so. To attempt to use broad legislative change as a mechanism to address perceived animal welfare concerns is unlikely to achieve

² Ison, S.H. et al. 2016. A Review of Pain Assessment in Pigs. *Frontiers in Veterinary Science*, 3, 108.

³ <http://www.animalwelfarestandards.net.au/pigs/>

animal welfare improvements from a whole of production perspective. Moreover, history shows that industry led improvement in this area through an alignment of research, production realities and regulation achieves the best result for pigs, producers and the community.

If you require further information or have any questions, please do not hesitate to contact Alister Oulton on [redacted] or [redacted].

Yours sincerely

Margo Andrae
Chief Executive Officer