

**VICTORIAN PIG
WELFARE INQUIRY:
SUBMISSION TEMPLATE**





STRUCTURING YOUR SUBMISSION:

Not sure where to start with your submission?

The following template lays out some key information which supports a call to ban gas chambers and the caging of mother pigs, as well as information regarding alternatives to the confinement and slaughter of pigs in Australia.

There are no formal requirements for how you make your submission. The amount of detail and time you put into it is totally up to you. However, the more information you provide, the more likely that your submission will add value to the inquiry and help influence the outcome.

While you can simply copy and paste the information we provide, taking some time to personalise your submission helps to show that there are a variety of people from all walks of life calling for the same thing. It also helps avoid your submission being overlooked as it looks too similar to others that have been made.

Note: Farm Transparency is ultimately calling for a complete end to the commercial farming and slaughter of animals in Australia. We therefore won't be offering suggestions regarding higher welfare alternatives to current industry practices, such as larger cages or alternative stunning methods. We do however stand in solidarity with animal protection groups who are making these calls, as we know that their work plays an important part in our shared goal of building a kinder world for all animals. If you don't want to call for a total end to confinement and slaughter, please see the bottom of this document for the recommendations we would prefer groups and individuals to make.

The following guidelines have been written by the Parliament of Victoria:

How should I format my submission?

There is no set format for submissions. Your contribution can take the form of a letter, paper or report. When writing your submission, please:

Make your submission brief and clear. If your submission is long, it is helpful to include a summary of your key points on the first page. Please number the pages in your submission.

Make sure your submission is readable. Committees prefer submissions to be A4-size and submitted electronically as a Word or PDF file.

Include additional material if appropriate. You may support your submission with additional material, such as articles or letters. If you wish to give or lend the committee other material such as DVDs, photographs or books, please contact the committee's office.

Make it clear who the submission is from. If you are making a submission on behalf of an organisation, please indicate your position in the organisation and the level at which the submission has been authorised.

Sign your submission. Please sign your submission. If you are sending your submission electronically, please provide your name and contact details (such as address or phone number).

Be relevant and appropriate. A committee may not accept a submission that is not relevant to the terms of reference, is frivolous or contains offensive language or remarks.

What should I put in my submission?

Each inquiry has terms of reference which set out the issues the committee will consider. Your submission should address one or more parts of the terms of reference, which can be found on the committee's website or obtained from the committee's office.

Your submissions may include facts, opinions, recommendations or suggested solutions to the issues the committee is considering.

TERMS OF REFERENCE & KEY INFORMATION:

Now, we'll go over the terms of reference for the pig welfare inquiry and lay out some key pieces of information which you can use to support your submission.

The Committee will investigate the welfare of farmed pigs in Victoria, including:

In brief:

- existing regulatory frameworks and their promotion of pig welfare outcomes;
- methods used to stun pigs before slaughter;
- outcomes of the 2017 industry-led phase out of sow stalls;
- current pig breeding and housing practices; and
- international industry best practice standards.

In full:

- the scope, application, compliance with and enforcement of relevant existing **regulatory frameworks** and their ability to promote **pig welfare outcomes**;
- the ability of the most common methods used to **stun pigs before slaughter** (including electrical stunning and exposure to high concentrations of carbon dioxide gas) in Victorian slaughterhouses to **minimise pain, suffering and distress and prevent injury, and available alternatives**;
- the **outcomes** of the 2017 industry-led phase out on the use of sow stalls;
- current industry **breeding and housing** practices particularly the use of different forms of **confinement**;
- **international comparisons** to determine industry adherence to best practice standards; and
- any other relevant matter.



EXISTING REGULATORY FRAMEWORKS:

Current Victorian animal welfare regulation contains exemptions for farmed animals, meaning that acts and practices that would be considered animal cruelty are allowed when covered by an industry code of practice. For pigs, this includes practices such as intensive confinement, mutilation without pain relief, transport and confinement without access to food, water and shelter and painful methods used to paralyse pigs before slaughter.

Neither Victorian or federal legislation specifically mentions practices considered 'best practice' by the Australian pork industry, including the use of carbon dioxide gas chambers. This means that the methods used to confine and slaughter pigs are being determined by the same industry that profits from slaughtering them as quickly and efficiently as possible, rather than by independent experts whose primary concern is the welfare of the pigs.

Enforcement of Victorian and federal legislation is largely outsourced to the industry itself, allowing for self-regulation (such as the industry promised sow-stall phase-out) and industry backed certification through schemes such as the The Australian Livestock Processing Industry Animal Welfare Certification System (AAWCS), which is supported by the Australian Pork industry and the Australian Meat Industry Council (AMIC).

Victorian legislation has adopted the federal standards laid out in the Hygienic production and transportation of meat and meat products for human consumption (AS4696). These include standards that animals should be handled, stunned and slaughtered in such a way as to minimise their pain, fear and suffering. Yet, investigations by Farm Transparency Project over 2022-2023 found multiple breaches of these standards and a failure of Victorian regulators to apply these standards. Please see the below for the standards most applicable to this inquiry.

Section 7: Slaughter

7.1 Premises and equipment are:

- (a) Used in a way;
- (b) Are maintained in a condition; that minimises risk of injury, pain and suffering to animals and causes them the least practicable disturbance.

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

7.9 Animals are slaughtered in a way that prevents unnecessary injury, pain and suffering to them and causes them the least practicable disturbance.

7.10 Before sticking commences, animals are stunned in a way that ensures the animals are unconscious and insensible to pain before sticking occurs and do not regain consciousness or sensibility before dying

7.11 Before stunning commences, animals are restrained in a way that ensures stunning is effective

In the footage that we have provided at www.farmtransparency.org/pigs-victoria you can find multiple examples of these standards being repeatedly violated.

METHODS USED TO STUN PIGS BEFORE SLAUGHTER

- Most Australian slaughterhouses now use carbon dioxide (CO2) gas chambers to render pigs unconscious prior to slitting their throats. Referred to by the industry as "controlled atmosphere stunning" this process involves lowering pigs into a chamber which is pumped full of deadly CO2 gas. The pigs are exposed to the gas for 2-4 minutes depending on the chamber. In most cases, this is long enough that they are functionally dead, unable to be woken up - making gas chambers a form of killing, rather than purely a stunning method.
- Between 85%-90% of Australian pigs are paralysed using CO2 gas. Footage captured by activists from five Australian gas chambers from between January and July 2023 showed that, at all of the slaughterhouses investigated, pigs were seen screaming, thrashing, gasping and trying to escape from inside the gondola, sometimes for minutes as they slowly suffocated.
- Hidden cameras also captured pigs being kicked, and forced into the chamber, as well as horrific injuries caused by the machinery, such as a pig's testicles being ripped off, and a pig severed pig trotter observed at the bottom of the chamber.
- While the industry claims that gas chambers are the most humane method of stunning when dealing with a large number of pigs, numerous investigations show how pigs frantically fight to escape the chamber, gasping for air and screaming in agony. In 2023, investigators exposed themselves to CO2 gas inside one of the industry's gas chambers to experience what the pigs would be feeling. Even after a short time with low concentrations of gas, they experienced burning eyes and lungs, panic and light-headedness. In reality, gassing pigs only has one benefit to the industry - it's the most efficient method of immobilising pigs for slaughter, meaning that they are able to kill more pigs at a faster rate.
- While investigating gas chambers in 2023, a Farm Transparency Project investigator hid himself inside of these chambers to reveal exactly what happens to pigs in their final moments. While inside one of these chambers filming, he witnessed many occasions where pigs would become stuck inside the gondola, unable to be tipped out. Other pigs would then be forced over the dead one, showing visible distress as they stopped to sniff her face before being kicked from behind and shoved deeper into the gondola. Once, a worker was witnessed climbing on top of the gondola to try and dislodge a pig, an act that demonstrates that, as well as being torturous for pigs, they are also dangerous to those operating them. In some chambers the only access point is a maintenance door at the top and a precarious ladder meaning that if a human or a pig were to fall inside, retrieving them would be incredibly dangerous and difficult.

- In a paper funded by Australian Pork Limited, Dr Ellen Jongman studied the responses of pigs to CO2 in five Australian abattoirs that use it. In response to questions from ABCs 7.30 regarding whether she thinks carbon dioxide gassing should be phased out, Jongman said:

"If we had a better alternative? Absolutely. But I think at this stage, there's still a lot of work that can be done to make CO2 better."

"At this stage, I can't see anything that's even close to being commercially available."

- The alternatives to carbon dioxide stunning are electric stunning, captive bolt stunning and stunning using a rifle. Each have significant issues, which you can read more about here: <https://www.farmtransparency.org/kb/food/pigs/pigs-as-animal>



CURRENT PIG BREEDING AND HOUSING PRACTICES:

90% of pigs bred for their flesh in Australia are raised in factory farms. Pigs in factory farms lead miserable lives in horrific conditions, which have been well documented in Australia.

Artificial Insemination

Boar semen collection is used widely in the agriculture sector. Boars used for semen collection are generally kept in small stalls with minimal room to move around. To collect semen, a 'dummy' or oestrus sow is used for the boar to mount.

It is outlined by the Queensland Department of Agriculture and Fisheries that:

- Dummy sows are placed in the pen of the boar; it is advised that the smell of another boar's semen, saliva, and sow urine, smeared on the dummy, will stimulate the boar to mount and thrust.
 - If the boar does not mount the dummy sow, a real sow is used so that the farmer can collect the boar's semen from her to smear on the dummy, attracting him to it.
 - When the boar is mounted on the dummy sow, the farmer grips the boar's penis allowing the boar to thrust, then applying pressure on his penis, imitating a sow's cervix, causing the boar to ejaculate.

Boars are forced to repeat this exploitative cycle up to 3 times every week. The legally accepted space requirement for boars confined in stalls is 0.7 metres by 2.4 metres long.

Sows are artificially inseminated using boar semen. They are confined to mating stalls for the process, which can take as long as 10 minutes.

It is outlined by the Queensland Department of Agriculture and Fisheries that:

- Boars are used to arouse the sow, while the farmer applies pressure to her back and hind legs, and rubs her vulva and udder, inducing the mating stance.
- The farmer separates the lips of the sow's vulva and forces a catheter into her vagina to find the cervix.
- A bottle containing boar semen is attached to the catheter and deposited inside the sow.

The same process is used in Victoria.

Bestiality is a criminal offence under the Crimes Act 1958; however, for the purpose of agriculture and scientific testing, these laws do not apply.

Sow stalls

A sow stall (gestation stall) is a metal pen where pregnant sows are forced to live during pregnancy. The stalls are not much larger than the sows, only allowing approximately 1 step forward or backward and no room to move from side to side at all or turn around.

The minimum legally required space for a sow kept in a sow stall is floor space of 0.6m wide and 2.2m long.

Farrowing Crates

When a sow is close to giving birth, it is standard industry practice to move her from group/loose housing into a farrowing crate. A farrowing crate is a small metal cage in which sows are confined while they give birth and nurse their piglets until they are moved to 'weaner' pens. A farrowing crate affords little room to do anything; generally they can take one step forward or backward or lay on the concrete floor so their piglets can nurse from them, but they can't turn around.

The legally accepted amount of space for sows in farrowing crates is 0.5 metres wide x 2 metres long. Sows will be kept here for approximately 6 weeks until her piglets are weaned, at which point the sow is re-impregnated..

Evidence gathered by activists shows farrowing sheds full of injured, sickly, dying, or dead piglets (often in their crates next to their mothers) and injured mother pigs. Piglets have been found crushed underneath their mothers, despite the industry stating that farrowing crates are used to prevent this from happening. The sows have a lot of trouble standing up or lying down due to injuries and the weakness of their muscles, so even when they lie down on top of one of their young, they are often unable to get back up, and they're unable to move away from their piglets to find a safe place to lie down

Group Housing

Sow stalls have largely been replaced by 'loose' or 'group' housing. Individual pens are still permitted to be used in loose housing systems. This system allows female pigs to move in and out of the sow stalls and into a small area with other females, still within a confined space in large sheds. In other examples, group housing does not involve individual stalls, and instead confines multiple pregnant sows to one pen, until they are ready to give birth, at which point they are moved to a farrowing crate. This method has been known to lead to more fighting between sows and pens, which are often dirty and overcrowded.

INTERNATIONAL INDUSTRY BEST PRACTICES

As previously mentioned, Farm Transparency Project will not be making suggestions on alternatives to industry best practice standards. We will be calling for:

1. A total ban on the use of small cages for mother pigs; including sow stalls and farrowing crates.
2. A total ban on the use of carbon dioxide gas chambers in Victorian slaughterhouses.
3. An end to the provision of public funding to the Australian Pork Industry, and a redirection of funds towards plant-based alternatives and the emergence of cultured meat.
4. A requirement that all packaging for pig meat products contain accurate information regarding confinement and slaughter methods used.
5. Government support for farmers to transition away from pig farming and into sustainable alternatives such as plant-based agriculture and cultured meat production.
6. An end to the farming and slaughter of pigs in Australia

If you do wish to recommend existing alternatives to current practices, our suggestions would be:

- For confinement of mother pigs: group housing with adequate space for sows to be able to lie down, stand up and move around freely, without engaging with other sows. A maximum of three sows per pen.
- For slaughter and stunning: the use of electric stunning, administered with observation from a veterinarian who is independently employed.

Any other relevant matter: we suggest; the intelligence and sentience of pigs.

- Pigs are highly social, curious, and intelligent animals who want to live just as much as we do. Pigs communicate with one another and have more than 20 recognised vocalisations. Pigs are also extremely clean animals; when given sufficient space pigs will take special care not to soil where they eat and sleep.
- Sows are incredibly maternal, building nests from their surrounding environment for their piglets and singing to them while nursing.
- Studies have shown that pigs have intelligence akin to that of a 4-year-old child.
- Feel free to share examples of pigs you have met and known, especially stories from farmed animals sanctuaries.



SUGGESTED SURVEY ANSWERS

Question 1

a) Are you aware of, or have you witnessed footage or images of stunning methods on pigs prior to slaughter in Victoria?

Yes No Not sure

b) Do you believe that the stunning of pigs prior to slaughter reduces their pain, suffering and distress?

Yes No Not sure

c) Do you support the use of carbon dioxide gas as a way of stunning pigs prior to slaughter?

Yes No Not sure

Question 2

Do you believe that animals should be killed to provide food for humans?

Yes No Not sure

Question 3

Do you believe that pig welfare should be balanced against economic factors for the producers (farmers) and processors (abattoirs)?

Yes No Not sure

Question 4

Would you be prepared to pay more for pork products if the industry advanced practices with better welfare outcomes?

Yes No Not sure

Question 5

a) Are you aware of or have you witnessed footage or images of the confinement methods used on pigs in Victoria?

Yes No Not sure

b) Do you believe current confinement methods promote positive welfare outcomes for pigs?

Yes No Not sure

SUGGESTED SUBMISSION STRUCTURE

Opening

Introduce yourself, why you are making a submission (your background and why the issue is relevant to you) and lay out your stance on the issues being investigated by the committee. If you are submitting on behalf of an organisation, make it clear at this point. Clearly state your suggestions and recommendations here then use the rest of the submission to support them. If nothing else, you can submit this opening sentence or paragraph by itself!

Body

Lay out your key points. Make sure to refer to the terms of reference. It can be helpful to use the terms of reference as headers to structure your submission. You can choose to address one or more of the terms of reference. Don't feel like you need to talk about everything!

Conclusion

End with what you would like to see as an outcome of the inquiry. Reaffirm your suggestions and recommendations which you presented in your opening and finish up by signing the submission and including your name (or the name of the organisation you are submitting on behalf of) and contact details.

Supporting information

If you have any information that you refer to or that supports your case, you can include it here. This may be links to footage, references for journal articles or links to online sources such as newspaper articles.



Fill out the
survey or write
a submission.

Watch the footage and learn more at
[FarmTransparency.org/victorian-pig-welfare-inquiry](https://farmtransparency.org/victorian-pig-welfare-inquiry)