



SUBMISSION ON THE AGRICULTURAL COMPETITIVENESS WHITE PAPER

7 April 2014

Voiceless Limited

ACN 108 494 631
2 Paddington Street
Paddington NSW 2021

P +61 2 9357 0703

F +61 2 9357 0711

Disclaimer: Voiceless Limited ACN 108 494 631 ('Voiceless') is a company limited by guarantee. Voiceless is not a legal practice and does not give legal advice to individuals or organisations. While Voiceless makes every effort to ensure the accuracy of information presented on its behalf, Voiceless does not guarantee the accuracy or completeness of that information. Information is provided by Voiceless as general information only and any use of or reliance on it should only be undertaken on a strictly voluntary basis after an independent review by a qualified legal practitioner (or other expert). Voiceless is not responsible for, and disclaims all liability for, any loss or damage arising out of the use of or reliance on information it provides. To learn more about Voiceless, please visit <http://www.voiceless.org.au>

ABOUT VOICELESS

As an innovator, capacity builder and ideas-generator, Voiceless plays a leading role in the development of a cutting edge social justice movement, animal protection.

With a highly professional and well-educated team, Voiceless brings together like-minded compassionate Australians from the legal, academic, non-profit and education sectors to form strong and effective networks.

Voiceless believes in the provision of quality information, analysis and resources to inspire debate and discussion and to empower individuals and organisations to generate positive social change.

Voiceless is a non-profit Australian organisation established in May 2004 by father and daughter team Brian and Ondine Sherman.

To build and fortify the animal protection movement, Voiceless:

- gives grants to key projects which create the groundswell for social change;
- cultivates the animal law community through the provision of leadership, educational opportunities and resources; and
- raises awareness of animal protection issues within the education system in order to strengthen democratic skills, promote critical thinking and encourage advocacy amongst students.

PATRONS

J.M. COETZEE, Nobel Prize for Literature Winner 2003, author of 'Lives of Animals' and 'Elizabeth Costello'

BRIAN SHERMAN AM, businessman and philanthropist

DR JANE GOODALL, world-renowned primatologist and animal advocate

THE HON MICHAEL KIRBY AC CMG, former judge of the High Court of Australia

AMBASSADORS

HUGO WEAVING, Actor: Oranges and Sunshine, Last Ride, Little Fish, Lord of the Rings Trilogy, Matrix Trilogy, The Adventures of Priscilla Queen of the Desert

EMILY BARCLAY, Actor: Prime Mover, Piece of my Heart, Suburban Mayhem, In My Father's Den

ABBIE CORNISH, Actor: w.e., Suckerpunch, Limitless, Bright Star, Stop Loss, Elizabeth: The Golden Age, A Good Year, Somersault, Candy

For further information visit <http://www.voiceless.org.au>

All correspondence in relation to this submission should be directed to:

Mr Emmanuel Giuffre
Voiceless
2 Paddington Street
Paddington NSW 2021 AUSTRALIA
T: + 612 9357 0713
F: + 612 9357 0711
Email: emmanuel@voiceless.org.au

© 7 April 2014

1. Introduction

- 1.1 This submission addresses the Agricultural Competitiveness White Paper (the **White Paper**) and the White Paper Issues Paper and Terms of Reference.
- 1.2 Voiceless commends Senator Barnaby Joyce, the Minister for Agriculture, for inviting submissions from the public on the White Paper. The Paper will be a blueprint for the future direction of the Australian agriculture industry, and provides the opportunity for stakeholders to shape that direction.
- 1.3 While Voiceless recognises the White Paper's potential for progressing the Australian agriculture industry, Voiceless is concerned that the Issues Paper and Terms of Reference do not consider the welfare needs of animals used in the Australian agriculture industry. It is Voiceless's position that the Department of Agriculture has sought to maximise the competitiveness of Australian primary industries to the complete exclusion of animal welfare, and as such, the Terms of Reference must be amended to acknowledge the importance of this consideration.
- 1.4 Our agricultural industry should not seek to compete with international competitors simply by increasing output, minimising production costs or intensifying production systems. High animal welfare standards are increasingly perceived as advantageous in the pursuit and widening of global trade relations, and are attractive to consumers in both domestic and international markets. Animal welfare is not only seen as important in itself, but are also seen as a marker of food quality and safety. Those countries with the highest animal welfare standards are leaders in international markets, and Australia cannot afford to omit animal welfare when developing a strategy for competition.
- 1.5 The submission below addresses Voiceless's concerns and emphasises the reasons why the White Paper must address animal protection. Voiceless agrees with the sentiments of Senator Joyce that the White Paper is an opportunity for stakeholders to consider the Australian agriculture industry as a 'blank slate' – to build a vision for, and shape the direction of, Australian agriculture for in 21st Century. For Voiceless, our vision is of an Australian agriculture industry where all animals are treated with respect and compassion and it is this vision that can, and should, be shared by both industry and government alike.

2. Summary of key recommendations

- 2.1 The following is a summary of Voiceless's key recommendations. Voiceless respectfully submits that these considerations should be reflected in the Terms of Reference, and accordingly, the White Paper:
 - 2.1.1 While Voiceless acknowledges that competitiveness is an important consideration for the Australian agriculture industry, it should not be sought to the exclusion of other important factors such as animal protection. The White Paper must focus on developing a sustainable agricultural industry for the

future, which includes considerations about animal protection as well as food safety and the environment.

- 2.1.2 Voiceless acknowledges the government's emphasis on innovation and the need for industry to invest in research, development and extension (RD&E). However, Voiceless submits that this investment should also extend to improving industry knowledge about the importance of animal welfare and developing practices and procedures to improve animal welfare.
- 2.1.3 Voiceless is firmly opposed to all forms of intensive factory farming. Until all Australian state and territory laws expressly prohibit intensive factory farming, millions of animals will continue to be subjected to cruel, inhumane and degrading practises and continue to experience lives of immense pain and suffering.
- 2.1.4 Voiceless notes the focus on profitability, productivity and efficiency to promote competitiveness. However, we submit that there is a clear relationship between increased productivity and declining levels of animal welfare. This is particularly the case with intensive factory farming practices. Government and industry must acknowledge and further explore this relationship through RD&E, and introduce stronger legislative safeguards to guarantee minimum standards of animal welfare. This includes, without limitation, the immediate prohibition on intensive factory farming practices.
- 2.1.5 Studies show that, to a certain extent, optimising animal welfare can have a positive effect on productivity. Of course, this is limited by the fact that there will always be a point where increased productivity will have a deleterious effect on animal welfare. Voiceless submits that investment in RD&E is needed to further highlight the benefits that optimising animal welfare can have on productivity. Industry and government must invest in disseminating this information to farmers and assist businesses in transitioning to more animal friendly practices.
- 2.1.6 While it is Voiceless's position that animal welfare is a public good, and should be protected and promoted by government and industry in its own right, there are incentives for Australian business to transition towards more animal friendly farming practices. There is a growing market for ethically derived produce and Australian farmers are well placed to meet this ever growing market demand. Accordingly, Voiceless submits that government and industry should invest in and promote these potential business opportunities and assist Australian businesses in transitioning to meet this demand.
- 2.1.7 To ensure the success of a market-based transition towards higher welfare farming, Voiceless recommends that nationally consistent truth-in-labelling legislation is needed to allow consumers to differentiate ethical products and in order to make more informed, animal friendly decisions. This should coincide with the development of industry and government based accreditation

schemes which have clear standards and guidelines on the welfare standards of animal produce.

- 2.1.8 Voiceless believes that it is inappropriate for government to place the responsibility for the protection of animal welfare on consumers. Given that price will continue to be priority for consumers, government and industry must recognise the importance of animal welfare and develop initiatives to assist businesses to convert to more ethical farming practices. A commitment to transition towards more ethical farming practices could, for example, be a condition precedent to producers being eligible for government funding or loan support.
- 2.1.9 Live animal exports is a cruel and inhumane trade and serves only to benefit a relatively small portion of the Australian agriculture industry. The trade is widely unpopular amongst members of the Australian public and across the agriculture sector. The regulatory regime in place to ensure animal welfare is maintained has failed and will continue to fail. Accordingly, Voiceless submits that the only solution is for the Australian government to bring this trade to an end.

3. Animal welfare and concerns with the further intensification of Australian farming

- 3.1 Voiceless is concerned that the Issues Paper and Terms of Reference do not consider the welfare needs of animals used in the Australian agriculture industry. It is Voiceless's position that the Department of Agriculture has sought to maximise the competitiveness of Australian primary industries to the complete exclusion of animal welfare.
- 3.2 One example of this is the proposal in the Issues Paper that the Australian agriculture industry will need to transition to more intensive production systems.ⁱ In Voiceless's view, such a transition would significantly compromise animal welfare.ⁱⁱ One of our core focus areas is on alleviating the suffering of animals exploited in intensive factory farms. The only way to avoid such suffering is to prohibit or gradually phase out all intensive factory farming practices.
- 3.3 The below section demonstrates how cheaper produce has resulted in adverse welfare outcomes for animals used in the Australian agriculture industry. It is by no means a comprehensive assessment of the welfare concerns associated with Australian agriculture practices.

Chickens

- 3.3.1 Hundreds of thousands of Australian layer hens suffer in caged egg production systems or 'battery cages' each year. In these systems, layer hens are subjected to cruel, inhumane and degrading animal husbandry practices like debeakingⁱⁱⁱ

and forced molting,^{iv} processes that continue to be permitted without pain relief, even under some free range accreditation schemes.^v

- 3.3.2 The fate of meat chickens (or broilers) is no better, the vast majority of which are forced to live in close confinement with tens of thousands of other chickens in stocking densities of about 20 birds per square metre.^{vi} This leaves each fully grown chicken with personal space approximately the size of an A4 page.^{vii} Chickens are subjected to artificial lighting for hours on end to increase feeding time and productivity, and to control the aggression which results from high stocking density.^{viii} In these intensive systems, broiler chickens are deprived of a meaningful quality of life.

Ducks

- 3.3.3 The vast majority of farmed ducks in Australia are raised intensively on factory farms, where they are denied access to natural light or to outside space.^{ix} This prevents ducks from exhibiting natural behaviours like roaming and socialising.^x Poor ventilation within sheds can result in ducks developing ammonia-related health problems, such as respiratory disease and blindness.^{xi} Ducks can also have their webbed feet or wings painfully caught in wire mesh flooring, resulting in trapped ducks dying from thirst or starvation.^{xii}
- 3.3.4 Deprivation of water is arguably the biggest welfare concern in the factory farming of ducks. Ducks are naturally aquatic animals who require access to water in order to clean themselves, to regulate their body temperature and to take the pressure off their naturally weak leg and thigh joints.^{xiii} Intensive housing systems are not required by law to provide ducks with a water source to engage in these behaviours.^{xiv} Accordingly, most Australian ducks must hold their entire body weight on their legs for up to seven weeks.^{xv} As a result, ducks can suffer from lameness, dislocated joints, broken bones and splay legs.^{xvi} Without a water source to use for cleaning and bathing, they can also suffer from heat stress and eye infections.^{xvii}

Pigs

- 3.3.5 Most pregnant pigs in Australia are confined to lives of chronic suffering in sow stalls.^{xviii} These are small metal and concrete cages that are barely larger than the mother pig's body. Sow stalls cause physical and psychological harm to mother pigs,^{xix} preventing natural behaviours like exploring and socialising with other pigs^{xx} and inflicting skin abrasions when sows press up against the metal bars.^{xxi} Sow stalls often lead to serious health problems, including reduced bone strength and muscle weight,^{xxii} impaired locomotion and severe lameness.^{xxiii}
- 3.3.6 Piglets in factory farms are taken away from their mothers prematurely; a stressful experience that causes a high incidence of clinical disease and diarrhea.^{xxiv} Male piglets are routinely castrated without pain relief, a practice

so painful that it can provoke trembling and vomiting.^{xxv} Piglets' teeth are often clipped without anaesthetic and this can cause up to 15 days of extreme pain.^{xxvi}

Failure of the Australian animal protection legislative framework

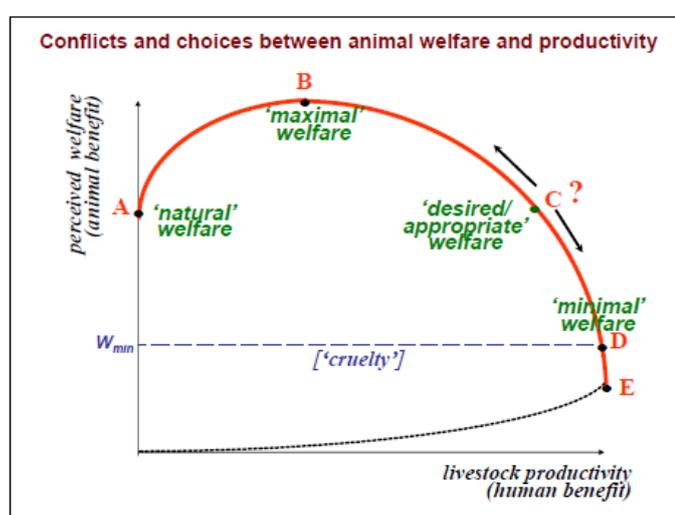
- 3.4 The current Australian legislative framework protecting animal welfare is evidently inadequate. As illustrated, the law permits producers to inflict immense suffering on factory farmed animals.
- 3.5 There has been some positive developments in Australia. The ACT government passed the *Animal Welfare (Factory Farming) Amendment Bill*, effectively banning the use of some of farming's cruelest practices from occurring in the ACT – namely, the use of battery cages,^{xxvii} sow stalls, farrowing crates^{xxviii} and debeaking.^{xxix} Tasmania introduced similar legislation in 2013, banning new battery farms from commencing operation (it does not affect the three existing battery farm operators in Tasmania)^{xxx} and introducing a partial ban on sow stalls to be phased in.
- 3.6 Despite these developments, Australia is sadly lagging behind international jurisdictions. The European Union (EU) banned the use of gestation crates for pigs and the use of battery cages for layer hens in 2013, and introduced additional stringent regulations on the slaughter and transport of animals. Further, the United Kingdom banned the use of veal crates in veal production over a decade ago, while Sweden, Germany, Finland and Austria have all independently outlawed battery cages.^{xxxi}

Recommendations

- 3.7 While Voiceless acknowledges that competitiveness is an important consideration for the Australian agriculture industry, it should not be the sole consideration and it cannot be sought to the exclusion of animal protection. The White Paper must focus on developing a sustainable agricultural industry for the future, which includes considerations of animal protection.
- 3.8 Voiceless acknowledges the government's emphasis on innovation and the need for industry to invest in RD&E. However, Voiceless submits that this investment should also extend to improving industry knowledge about the importance of animal welfare and developing standard practices and procedures to improve animal welfare.
- 3.9 Voiceless is firmly opposed to all forms of intensive factory farming. Until all Australian state and territory laws expressly prohibit intensive factory farming, millions of animals will continue to be subjected to cruel, inhumane and degrading practises and continue to experience lives of immense pain and suffering. Accordingly, Voiceless recommends that the Department of Agriculture consider international and domestic developments, by taking into account the need for greater protections of animals used in the Australian agriculture industry.

4. Correlation between high productivity and poor animal welfare outcomes

- 4.1 In 2004, the agricultural economist, John McInerney, proposed that there is a non-linear relationship between welfare and productivity. The assumption is that as humans start to use animals, improvements in welfare and productivity coincide due to certain positive inputs (such as feed, housing, protection from predators, etc.). However, as levels of productivity increase, welfare may show no further improvement and then be increasingly impaired by the higher metabolic demands or environmental constraints placed on the animals.^{xxxii} This non-linear relationship is shown in the diagram below:



- 4.2 The drive for higher productivity and efficiency and accordingly cheaper produce, is largely attributable to competition between producers and between retailers resulting in a 'race to the bottom'. Consumer demand for cheaper produce is generally seen as a secondary contributor to this trend.^{xxxiii} Cheap produce has impacted negatively on a range of issues, including food quality and safety, unreliability of farm incomes, environmental damage and, as illustrated previously, poor animal welfare outcomes.^{xxxiv}

Recommendations

- 4.3 As highlighted above, government and industry must acknowledge and further explore the relationship between productivity and welfare through RD&E, and introduce stronger legislative safeguards to guarantee the welfare of animals. This includes, without limitation, the immediate prohibition on intensive factory farming practices, such as the use of battery cages, sow stalls and farrowing crates (which subject animals to repeated and prolonged stress) and painful mutilation practices like debeaking, dehorning and tail docking (which are known to cause both chronic and acute pain).

5. The correlation between positive animal welfare outcomes and productivity

- 5.1 Improving animal welfare and promoting the productivity, profitability and competitiveness of primary industries are not mutually exclusive objectives. Investing in animal welfare can promote productivity and prove profitable for producers.
- 5.2 Studies have shown a non-linear relationship between improvements in animal welfare and their effect on performance and profitability. This depends on a variety of factors, such as the extent to which improvements influence biological function, the specific needs of the animal in question and the produce sort from the animal (i.e., milk, meat or eggs, etc). This is also limited by the fact that, as highlighted previously, there will always be a point where increased productivity will have a deleterious effect on animal welfare.
- 5.3 In saying that, at the physiological level, animals subjected to repeated or prolonged stress show endocrine changes, which adversely affect many productive processes including synthesis of lean tissue and milk, feed intake and efficiency of feed use, reproductive efficiency in production of eggs or live offspring.^{xxxv}
- 5.4 There have been a number of studies which illustrate that high animal welfare leads to higher growth rates. For example, Ruiterkamp demonstrated that a high amount of pen mate-directed behaviour in the barren rearing environments of intensive farming environments has a negative effect on the productivity of pigs as a consequence of inconsistent feeding patterns. Morgan et al found similar results. Beattie et al compared the treatment of fattening pigs in both intensive farming environments and welfare enriched environments, finding that the environment consistent with positive animal welfare practices produced higher food conversion ratios and pigs with greater body weight.^{xxxvi} It has also been found that providing soft bedding for dairy cattle can significantly increase milk yield.^{xxxvii}
- 5.5 There are also complex interactions between welfare and disease and, accordingly, food quality, safety and security. Stress can impair immune function, making animals more susceptible to disease. Disease is a welfare problem, causing pain and malaise, and a financial loss in terms of reduced performance and increased veterinary and labour costs.^{xxxviii}
- 5.6 There are consequently strong, self-rewarding drivers to improve welfare on farm when considered from the perspective of biological function. This is particularly clear in the case of basic requirements like good health, good nutrition and a suitable thermal environment (the criteria for three of the Five Freedoms), but is also true for freedom from fear and stress. Good stockmanship is also critical to animal welfare, with sympathetic animal handling significantly reducing physiological stress and improving productive output in many farm species.^{xxxix}

Recommendation

- 5.7 As illustrated above, improvements in animal welfare can contribute significantly to the productivity, profitability, and in turn, the competitiveness of Australian agriculture. Voiceless submits that investment in RD&E is needed to further highlight the benefits that optimising animal welfare can have on productivity. In addition, industry and governments must invest in disseminating this information to farmers and assist businesses in transitioning to more animal friendly practices.

6. Market approach to improve farm animal welfare

- 6.1 While many initiatives to improve animal welfare will pay for themselves, there may be others that have a net cost to business, and therefore, require other forms of incentives to motivate their adoption. It is Voiceless's position that animal welfare is a public good, and should be protected and promoted by government and industry in its own right. In saying that, there are incentives for Australian businesses to transition towards more animal friendly farming practices. There is a growing market for animal welfare, which can to some extent compensate business for these additional costs through an increase in retail prices.
- 6.2 This increase in cost to consumers does not need to be large, as studies indicate that increases in production costs can be covered by a much smaller increment in retail price.^{xi} In saying that, it is Voiceless's position that any such market-based approach must also be accompanied by nationally consistent and enforceable legislation to improve animal welfare and provide for truth-in-labelling.

Changing consumer demand and community expectations

- 6.3 Over the last decade, Australian consumers have increasingly embraced the global ethical food movement.^{xii} This coincides with the increasing public interest in animal protection issues in the Australia community.
- 6.4 In a 2014 national survey of 1,041 adult Australians aged 18 and over commissioned by Voiceless revealed that:
- 6.4.1 54.5% of respondents felt that the wellbeing of animals used for food production was 'very important' to them and 34.4% felt it was 'somewhat important';
 - 6.4.2 61% of respondents have bought 'free range' or 'humanely' derived animal products on animal welfare grounds; and
 - 6.4.3 74.9% of respondents support a law requiring that farm animals including pigs, cows, and chickens are provided with enough space to exhibit their natural behaviours.
- 6.5 In April 2012, consumer protection group CHOICE conducted a survey of 900 of their members about free range food and labelling.^{xiii} The survey found:

- 6.5.1 60% of respondents felt it was 'essential' that the eggs they buy are free range, while a further 25% say it's 'important';
 - 6.5.2 85% of free range buyers noted animal welfare considerations among the reasons for their choice; and
 - 6.5.3 52% of respondents said they were willing to pay \$3-\$5 more per dozen for free range rather than caged eggs.
- 6.6 In 2011 Voiceless commissioned a national survey of 1,006 adult Australians over 18 years of age. The survey found: 80% of individuals believed battery cages should be banned; 82% of individuals felt that sow stalls should be banned, and 66.6% of respondents considered animal welfare to be an important factor when purchasing food at the supermarket.
- 6.7 In a 2006 national survey, participants identified factory farming practices and treatment of livestock as amongst the most prominent issues in Australian animal welfare.^{xliii}
- 6.8 Moreover, research suggests that consumers strongly associate improved farm animal welfare with food quality, safety, taste, nutrition and environmental impacts.^{xliv}

Meeting the demand for ethically derived foods

- 6.9 There have been significant moves from retailers and producers to capitalise on this change in consumer and community sentiment:
- 6.9.1 A number of voluntary standards and third party certification or accreditation schemes have emerged, enabling producers to differentiate their products on animal welfare grounds.^{xlv}
 - 6.9.2 Coles announced that it would cease to sell Coles brand caged eggs by 2013 and to phase out the use of sow stall pork, bacon and ham in their Coles brand products.^{xlvi}
 - 6.9.3 Woolworths announced that it will phase out caged eggs from sale and the use of caged eggs in the ingredients of their own brand products by December 2018. Woolworths also announced that its fresh pork range is partially sow stall free.^{xlvii}
 - 6.9.4 The Australian pork industry has committed to voluntarily phasing out sow stalls by 2017. Specifically, the industry is aiming to ensure that sows are kept in loose housing from five days after mating, until one week before they are ready to give birth. This period would typically take around 105 days.^{xlviii}
- 6.10 The Australian Consumer and Competition Commission (ACCC) is cracking down on misleading and deceptive animal welfare claims (or 'credence claims') made by producers seeking to wrongfully capitalise on this consumer demand.^{xlix} The Federal Court has found in favour of the ACCC and handed down substantial penalties on

Australian chicken meat, egg and duck meat producers for misleading and deceptive conduct in their marketing and product labelling.ⁱ

6.11 Moreover, a rapidly growing number of Australian corporations are recognising the importance of animal welfare and incorporating these considerations into their corporate social responsibility strategies.ⁱⁱ

6.12 The above reflects an appreciation from producers, retailers, the ACCC and the Australian Federal Court that animal welfare is a growing concern for the Australian community, and that consumers are willing to pay more for cruelty-free produce.

The need for legislative reform

6.13 While there has been a clear change in consumer and community expectations, this does not necessarily translate into consumer action at the point of purchase.ⁱⁱⁱ Consumers care about animal welfare, as well as such factors as food quality and safety, sustainability and geographical provenance; however, studies indicate that food prices remain the highest concern for consumers.^{liii}

6.14 Accordingly, and as is the case with responsibility for environmental protection, it is Voiceless's position that it is inappropriate for governments to put the responsibility for protection of animals on customers at point of sale when they are driven by other priorities.^{liv} Evidence suggests that many consumers prefer to transfer the responsibility of ensuring welfare, as well as other ethical considerations, to the retailer or to other decision-makers in the supply chain rather than being required to make choices at the time of purchase.^{lv} This is consistent with studies that have indicated consumers are largely in favour of legislation to improve animal welfare in food production.

6.15 Moreover, it is important to note that consumer knowledge and education is vitally important for a market-based approach to be successful. There have been certain successes driven by consumer demand, namely in the free range egg movement. Using the European free range egg market as an example, the willingness of consumers to pay a premium for higher animal welfare seems to rely on a number of factors, including the distinctiveness of the production systems (cage versus free range) and compulsory truth in labelling according to a clear and agreed system of definitions.^{lvi}

Recommendation

6.16 While it is Voiceless's position that animal welfare is a public good, and should be protected and promoted by government and industry in its own right, there are incentives for Australian business to transition towards more animal friendly farming practices. Voiceless's position is that the Australian agriculture industry can be profitable, productive and remain internationally competitive by meeting the demand for ethically farmed produce. Accordingly, farmers need to be more aware of, and responsive to, market opportunities in relation to animal welfare and government should promote business opportunities to develop this market.

- 6.17 Australia should seek to compete in the market for high-quality animal-friendly produce, and not attempt to compete with international markets such as Asia by maximising output and reducing costs. This will inevitably lead to a 'race to the bottom' - not only in animal welfare standards, but in other areas such as food safety and security and environmental.
- 6.18 Given that price continues to be a priority for consumers, Voiceless submits that government and industry initiatives must be developed to subsidise ethically produced food. Initiatives must also be developed to assist farmers in converting to more ethical farming practices. A commitment to transition towards more ethical farming practices could, for example, be a condition precedent to producers being eligible for government funding or loan support.
- 6.19 As previously noted, Australia's animal welfare standards need to be raised so that our produce can compete in this market. In addition, consumer knowledge and education is vitally important for a market-based approach to be successful. Accordingly, Voiceless advocates the introduction of nationally consistent truth-in-labelling legislation to appropriately differentiate ethical products and to allow consumers to make informed, animal friendly decisions. This would involve:
- 6.19.1 a mandatory labelling regime for all animal products clearly indicating the farm production method;
 - 6.19.2 a uniform set of defined terms of farm production methods that are linked to uniform animal protection standards;
 - 6.19.3 a regulatory monitoring and enforcement system (through consumer protection legislation) that ensures compliance with labelling laws;
 - 6.19.4 an extensive public education campaign to assist consumers in understanding the various production standards and systems and the descriptions on the labels;
 - 6.19.5 a 'traffic light' labelling system that differentiates between low, medium and high levels of animal welfare, also linked to the animal protection standards; and
 - 6.19.6 the placement of photos or images of animals on the products that reflect the animal production system used.
- 6.20 Truth-in-labelling legislation should be implemented in conjunction with both government and independently certified accreditation schemes that prescribe enforceable animal welfare standards on production systems.
- 6.21 Voiceless submits that animal welfare law reform is vitally important. While a market based response will assist in transitioning the Australian agriculture industry to more animal friendly husbandry practises, the government must acknowledge the importance and intrinsic worth of promoting animal protection in its own right as a public good – not simply for its economic benefits. Accordingly, and as outlined above,

the Australian government must look to reform Australia's animal protection legal landscape to improve farm animal welfare standards, particularly to outlaw factory farming practices.

7. A national ban on live export

7.1 The Issues Paper recommends a boost in the export market, which would extend to the live animal export trade.^{lvii} Critically, neither the Issues Paper or the Terms of Reference acknowledge:

- 7.1.1 the inherent and unavoidable animal cruelty associated with live animal exports;
- 7.1.2 the inability of the Australian government to regulate live animal exports, or to guarantee the welfare of Australian animals exported live;
- 7.1.3 the lack of support for live animal exports among both industry participants and the broader Australian public;
- 7.1.4 the fact that most Australian farmers do not rely on live exports, and that it is a small and declining industry; and
- 7.1.5 the live export trade does not contribute significantly to Australia's economy.

Animal welfare implications of live animal exports

7.2 The animal welfare concerns associated with live animal exports is well established. Professor Clive Phillips, Director of the Centre for Animal Welfare and Ethics at the University of Queensland, explains the incredible length and trials of the live export journey:

"It begins with the mustering of the stock, often on remote properties, and it ends with animal slaughter in the country of destination. In between, the stock will be handled at least a further five or six times and the whole process is likely to last between one and two months. Little is known about the cumulative effects of these combined stresses on the welfare of the animals but it is possible that multiple stressors could make the animals anxious, depressed or enter a phase of learned helplessness."^{lviii}

7.3 Animals shipped live from Australia can be confined on vessels for up to three weeks – amounting to 504 consecutive hours.^{lix}

- 7.3.1 High temperatures and poor ventilation can contribute to fatal heat stroke in cattle, particularly in those breeds whose physiology is ill-suited to hot climates.^{lx}
- 7.3.2 Sheep are transferred from a pasture-based diet to concentrated pellets – a change which some animals reject. Failure to eat can lead to salmonellosis and even death, with around half of sheep mortalities occurring this way.^{lxi}

- 7.3.3 Animal waste generates ammonia gas which, in high concentrations on board ships, can irritate the animals' eyes, nasal cavities and respiratory tracts, resulting in lacrimation (crying), coughing and nasal discharge.^{lxii} Sheep have shown a clear aversion to ammonia^{lxiii} and tests have shown that it adversely affects the welfare of steers.^{lxiv}
- 7.4 Tens of thousands of animals die every year in transit, yet the live export industry argues that it is achieving good welfare outcomes because these animal deaths are a small proportion of the total shipped. The fact remains that as many as 20,000 sentient animals die at sea from disease or injury each year. Their deaths are no less tragic or unethical because their peers survived. Furthermore, these mortality rates do not reflect morbidity. Many more animals are likely to suffer the diseases and poor states of welfare described above without dying and 'becoming a statistic'.^{lxv}

Inability to protect Australian animals overseas

- 7.5 In an attempt to regulate the welfare of Australian animals in destination markets, the Australian government implemented the Exporter Supply Chain Assurance System (ESCAS).^{lxvi} Requirements include transport, handling and slaughter which comply with the World Organisation for Animal Health (OIE) welfare standards, control and traceability through the supply chain and independent auditing.^{lxvii} However, there are a number of concerns with this regulatory regime:
- 7.5.1 ESCAS is largely reactionary, as its focus is on detecting and responding to cruelty, as opposed to preventing it occurring in the first place.
- 7.5.2 ESCAS requires exporters and foreign animal production facilities to comply with internationally agreed standards for animal welfare established by the OIE. However, these standards fall well short of the animal welfare standards expected in Australia. For example, the OIE standards permit the slaughter of animals without pre-stunning.^{lxviii}
- 7.5.3 ESCAS does not apply to breeder animals, which includes a large number of dairy cattle exported live. Accordingly, these animals are exempt from additional exporter controls or welfare protection beyond the point of disembarkation.
- 7.5.4 Exporters are not required to disclose important matters of welfare such as the health of animals at loading and unloading or the conditions and method of slaughter.
- 7.5.5 Australia has no jurisdiction to impose regulatory obligations in destination countries. Similarly, the Australian government has not committed the resources or the personnel to monitor and enforce compliance with ESCAS in destination countries.
- 7.5.6 According to the RSPCA, accountability mechanisms, effected through the various reporting obligations under the ASEL and ESCAS, lack independence.

Both AQIS accredited veterinarians under the ASEL and the independent auditors under the ESCAS are engaged and compensated directly by exporters.^{lxxix}

- 7.6 Since its inception, there have been 29 complaints raised alleging exporter non-compliances with ESCAS.^{lxxx} Of these, not one was detected or reported by the Department of Agriculture. Critically, while these complaints have uncovered horrendous cases of animal cruelty in destination countries and flagrant breaches of the live export regulations by Australian exporters, the Australian government has failed to impose any penalties or the restrict/cancel the licences of any infringing Australian exporter.^{lxxxi}

An unpopular trade

- 7.7 A 2012 survey found that 78% of Australians believed live exports were cruel, a majority consistent with another poll from 2011. Further, 74% were more likely to vote for a political candidate who promised to end live animal export.^{lxxxii} Live animal exports is also unpopular amongst industry stakeholders, with the Australasian Meat Industry Employees Union backing an export ban, believing such a move would create thousands of jobs in regional Australia.^{lxxxiii}

Contribution of live exports to the economy

- 7.8 A phase out of the live export trade will not cripple the agriculture industry. In fact, economists argue that the transition away from live export would create more jobs and contribute more to domestic agriculture.^{lxxxiv} The reality is that live export is not necessary to the Australian economy:^{lxxxv}

- 7.8.1 Most Australian farmers do not live export. In 2012, only 7% of cattle and 10% of sheep farmed in Australia were exported.
- 7.8.2 Live export is a small and declining industry, accounting for only 0.3% of all Australian exports.
- 7.8.3 Live export accounts for a small portion of the Australian cattle and sheep industry. The industry is worth \$16 billion annually, compared with the live export industry which is worth only \$783 million.
- 7.8.4 Live export is a risky investment for Australian businesses. Given its unpopularity, the trade has an uncertain future and subject to temporary or permanent closure due to political or trade disputes, rejections, incidents at sea or animal cruelty exposés.

Recommendations

- 7.9 Economists suggest that a transition from live export to a domestically processed chilled meat trade would likely create more jobs and contribute more to the Australian economy than the present trade.^{lxxxvi} While a transition to domestic processing would

be a step in the right direction from an animal welfare perspective, it is Voiceless's position that any such transition would need to be accompanied by significant improvements in our domestic animal welfare standards before this is an acceptable solution.

- 7.10 Irrespective of these economic considerations, the Australian government must acknowledge the trade is cruel and inhumane. New Zealand, a country comparable to Australia in terms of its distance from foreign trade partners, recognised the inherent cruelty in live animal exports and since 2007 has not exported slaughter or feeder animals alive. Australia should follow New Zealand's lead.
- 7.11 The vast majority of Australians now agree that the trade is indefensible, and like many such trades in human history, the only acceptable option for Prime Minister Abbott and Senator Joyce is to bring it to an immediate end.

Respectfully submitted by Emmanuel Giuffre, Legal Counsel, Voiceless

Endnotes

ⁱ The Commonwealth of Australia, *Agricultural Competitiveness Paper* (2014), 8.

ⁱⁱ Voiceless the animal protection institute, *From Paddocks to Prisons* (2005); Voiceless the animal protection institute, *Science and Sense: the case for abolishing sow stalls* (2013); Voiceless the animal protection institute, *From Nest to Nugget* (2008).

ⁱⁱⁱ The Poultry Code, paras 12.5 and 13.2. Due to the suppression of many of their natural instincts and social interactions, layer hens raised in factory farms often become frustrated. This may trigger pecking, bullying and cannibalism. In an attempt to prevent this behaviour from causing injuries, factory farmers routinely conduct 'de-beaking' on chicks. This involves the practical removal or burning off of the upper and lower beak through the application of an electrically heated blade. Despite the fact that de-beaking is known to cause acute and chronic pain (particularly in older birds) due to tissue damage and nerve injury, nearly all Australian States and Territory permit the practice to be conducted without pain relief. See for example. The ACT is the only Australian jurisdiction which prohibits the de-beaking of chickens.ⁱⁱⁱ

^{iv} Model Code of Practice for the Welfare of Animals- Poultry, (4th Edition) (2002) ('the Poultry Code'), para 5. Molting is a natural process whereby hens lose their feathers once a year and their reproductive system becomes revitalised. Commercial farming adopts the practice of forced molting. Food is withheld from the hen for a period of up to 21 days, causing intense stress and the loss of the hens' feathers. Although their reproductive system essentially shuts down, once molting has been completed, the hens lay larger eggs. All hens within one farm will undergo forced molting simultaneously. This practice although incredibly cruel and unnatural, is still permitted in most Australian states and territories.

^v RangeCare's Code of Practice for Accreditation by FREPA <<http://www.frepa.com.au/>>, accessed on 31 March 2014; Humane Choice True Free Range <<http://www.humanechoice.com.au/>>, accessed on 31 March 2014 and RSPCA Approved Farming Scheme <<http://www.rspca.org.au/what-we-do/working-farming-industry/approved-farming-scheme>>, accessed on 31 March 2014.

^{vi} Space allowance varies based on the weight of the chicken and the State/Territory in which the bird is being raised. The figure cited assumes a slaughter weight of just under 2kg per bird. Modern facilities with 'tunnel ventilation systems' are permitted to keep more chickens per square metre than systems without tunnel or mechanical ventilation systems. See Model Code of Practice for the Welfare of Animals - Poultry, (4th edition) (2002), sections 2, 3 and Appendix 2; Animal Care & Protection Regulation 2002 (Qld) regulation 15; Prevention of Cruelty to Animals Regulation 2000 (SA) regulation 130(b); Victorian Department of Primary Industries, Prevention of Cruelty to Animals (Domestic Fowl) Regulations 2006 (Vic) (January 2009).

^{vii} This statement is based on the assumption of 20 two kilogram birds being kept per square meter, averaging 500 cm² per bird for meat chickens. An A4 page, with sides of 21.0 cm x 29.7 cm, has an area of 623.7 cm².

^{viii} H.A. Olanrewaju, J.P. Thaxton, W.A. Dozier III, J. Purswell, W.B. Roush and S.L. Branton, 'A Review of Lighting Programs for Broiler Production' (2006) 5(4) International Journal of Poultry Sciences, 301-308; Gerry Bolla, 'Lighting of Poultry', Prime Facts (April 2007) NSW Department of Primary Industries <http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0007/212974/Lighting-of-poultry.pdf>.

^{ix} Animal Liberation, 'Like a duck out of water: an expose of the Australian duck industry', (October 2013) page 5 <http://www.aussieducks.com.au/documents/Duck_Report.pdf>, accessed on 29 January 2014.

^x Ibid, 7.

^{xi} Ibid, 17.

^{xii} Ibid, 14.

^{xiii} The Humane Society of the United States, 'An HSUS Report: The Welfare of Animals in the Duck Industry' <<http://www.humanesociety.org/assets/pdfs/farm/hsus-the-welfare-of-animals-in-the-duck-industry.pdf>>, accessed 29 January 2014.

^{xiv} Primary Industries Standing Committee, Model Code of Practice for the Welfare of Animals: Domestic Poultry 4th Edition ('Poultry Code'), Appendix 4.

^{xv} Poultry Cooperative Research Centre, Poultry Hub <<http://www.poultryhub.org/species/commercial-poultry/duck/>>, accessed on 29 January 2014.

- xvi The Humane Society of the United States, 'An HSUS Report: The Welfare of Animals in the Duck Industry' <<http://www.humanesociety.org/assets/pdfs/farm/hsus-the-welfare-of-animals-in-the-duck-industry.pdf>>, accessed 29 January 2014.
- xvii Ibid.
- xviii Voiceless the animal protection institute, Pigs, <<https://www.voiceless.org.au/the-issues/pigs>>.
- xix Ibid.
- xx 'Eath RB and Turner SP, 'The natural behaviour of the pig' in Jeremy N Marchant Forde (ed), *The Welfare of Pigs* (Springer Science+Business Media, Dordrecht, 2009).
- xxi Anil L et al, 'Comparison of injuries in sows housed in gestation stalls versus group pens with electronic sow feeders' (2003) 223 *J Am Vet Med Ass* 1334-1338; Guillermo A M Karlen et al, 'The welfare of gestating sows in conventional stalls and large groups on deep litter' (2007) 105 *Appl Anim Behav Sci* 87-101.
- xxii J N Marchant and D M Broom, 'Effects of dry sow housing conditions on muscle weight and bone strength' (1996) 62 *Anim Sci* 105-113.
- xxiii Anil L et al, 'Comparison of injuries in sows housed in gestation stalls versus group pens with electronic sow feeders' (2003) 223 *J Am Vet Med Ass* 1334-1338; Guillermo A M Karlen et al, 'The welfare of gestating sows in conventional stalls and large groups on deep litter' (2007) 105 *Appl Anim Behav Sci* 87-101.
- xxiv P Baynes and M Varley, 'Gut health: practical considerations' in Mike A Varley and Julian Wiseman, *The Weaner Pig: Nutrition and Management* (CABI Publishing, 2001) 249.
- xxv F Wemelsfelder and G van Putten, 'Behaviour as a possible indicator for pain in piglets' IVO Report B-260 Research Institute for Animal Production Schoonoord, Schiest, Netherlands quoted in A.F. Fraser and D.M. Broom *Farm Animal Behaviour and Welfare* (CABI Publishing, 1997) 266.
- xxvi M Hay et al, 'Long-term detrimental effects of tooth clipping or grinding in piglets: a histological approach' (2004) 13 *Animal Welfare Journal* 27-32.
- xxvii Section 9A, Animal Welfare Act 1992 (ACT).
- xxviii Section 9B, Animal Welfare Act 1992 (ACT).
- xxix Section 9C, Animal Welfare Act 1992 (ACT).
- xxx Except to cap the number of pens in production, "Tasmania to ban battery hen farming", ABC.net.au (19 May 2012), <<http://www.abc.net.au/news/2012-05-18/tasmania-to-ban-battery-hen-farming/4019200>>, accessed on 31 March 2014.
- xxxi Gaverick Matheny and Cheryl Leahy, 'Farm-Animal Welfare, Legislation, and Trade (2007) 70 *Law and Contemporary Problems*, 325; <<http://jgmatheny.org/matheny%20leahy%202007.pdf>>.
- xxxii John McNerney, 'Animal Welfare, economics and policy - Report on a study undertaken for the Farm & Animal Health Economics Division of Defra' (2004) <<http://archive.defra.gov.uk/evidence/economics/foodfarm/reports/documents/animalwelfare.pdf>>, accessed on 27 March 2014.
- xxxiii See, for example, Michael C. Appleby, et al., 'What price cheap food?' (2003) *Journal of Agricultural and Environmental Ethics* 16, 396.
- xxxiv Ibid, 395.
- xxxv Farm Animal Welfare Committee, 'Economics and Farm Animal Welfare' (December 2011) p 13, <<http://www.defra.gov.uk/fawc/files/Report-on-Economics-and-Farm-Animal-Welfare.pdf>>, accessed on 27 March 2014.
- xxxvi Compassion in World Farming, 'Reviewing the Costs: the economics of moving to higher welfare farming' (2011) 8.

xxvii Farm Animal Welfare Committee, 'Economics and Farm Animal Welfare' (December 2011) p 14, <<http://www.defra.gov.uk/fawc/files/Report-on-Economics-and-Farm-Animal-Welfare.pdf>>, accessed on 27 March 2014.

xxviii Farm Animal Welfare Committee, 'Economics and Farm Animal Welfare' (December 2011) p 13, <<http://www.defra.gov.uk/fawc/files/Report-on-Economics-and-Farm-Animal-Welfare.pdf>>, accessed on 27 March 2014.

xxix Farm Animal Welfare Committee, 'Economics and Farm Animal Welfare' (December 2011) p 14, <<http://www.defra.gov.uk/fawc/files/Report-on-Economics-and-Farm-Animal-Welfare.pdf>>, accessed on 27 March 2014.

xl See, for example, Michael C. Appleby, et al., 'What price cheap food?' (2003) *Journal of Agricultural and Environmental Ethics* 16 p 403.

xli Jed Goodfellow, Melina Tensen and Lynne Bradshaw, 'The future of animal welfare policy and its implication for Australian livestock industries' (forthcoming article due to be published in the *Farm Policy Journal*); Flint Duxfield, 'Ethical food movement continues to grow' *ABC Rural* (3 April 2013) <http://www.abc.net.au/site-archive/rural/news/content/201304/s3728627.htm>, accessed on 6 April 2014; Rachel Clemons and Angela Cartwright, 'Free Range Eggs', CHOICE (updated 26 March 2014) <<http://www.choice.com.au/reviews-and-tests/food-and-health/food-and-drink/organic-and-free-range/free-range-eggs-2012.aspx>>, accessed on 6 April 2014; and TNS Social Research Consultants, *Attitudes Toward Animal Welfare*, July 2006, at 3.2.

xlii Rachel Clemons, 'Free Range Eggs', CHOICE (30 May 2012) <<http://www.choice.com.au/reviews-and-tests/food-and-health/food-and-drink/organic-and-free-range/free-range-eggs-2012.aspx>>, accessed 26 March 2014.

xliii TNS Social Research Consultants, *Attitudes Toward Animal Welfare*, July 2006, 3.2.

xliv Farm Animal Welfare Committee, 'Economics and Farm Animal Welfare' (December 2011) p 18, <<http://www.defra.gov.uk/fawc/files/Report-on-Economics-and-Farm-Animal-Welfare.pdf>>, accessed on 27 March 2014.

xlv Such schemes include Humane Choice, RSPCA Approved Farming and Demeter Bio-dynamic.

xlvi Coles Limited, 'Coles blog', 'Better Animal Welfare at Coles!' <<http://blog.coles.com.au/2013/01/09/better-animal-welfare-at-coles/>>, accessed on 31 March 2014.

xlvii All Woolworths fresh pork meat is sourced from farms that only use stalls for less than 10% of the sows' gestation period: Woolworths Limited, 'Animal Welfare', <[http://www.woolworthslimited.com.au/page/A Trusted Company/Responsible Sourcing/Animal Welfare/](http://www.woolworthslimited.com.au/page/A%20Trusted%20Company/Responsible%20Sourcing/Animal%20Welfare/)>, accessed on 27 March 2014.

xlviii Australian Pork Limited, 'Housing' <<http://australianpork.com.au/industry-focus/animal-welfare/housing/>>, accessed on 27 March 2014.

xlix "ACCC cracks down on egg producers", *News.com.au* (10 December 2013), <<http://www.news.com.au/finance/business/accc-cracks-down-on-egg-producers/story-e6frfkur-1226779888264>>, accessed on 28 March 2014.

¹ See, for example, *Australian Competition and Consumer Commission v Turi Foods Pty Ltd* (No 4) [2013] FCA 665 where Baiada Poultry Pty Ltd, Bartter Enterprises Pty Ltd and the Australian Chicken and Meat Federation Inc were found to have misled and deceived the public by labelling Baiada and Bartter's chickens as 'free to roam' when the stocking densities of meat chickens in such facilities did not allow for chickens to roam freely; *Australian Competition and Consumer Commission v Pepe's Ducks Ltd* [2013] FCA 570 where Pepe's was found to have misled and deceived the public by claiming that their ducks were "open range" and "grown nature's way" when in fact they were intensively raised; *Australian Competition and Consumer Commission v Luv-a-Duck Pty Ltd* [2013] FCA 1136 where the statements that ducks were "range reared and grain fed" in the "spacious Victorian Wimmera Wheatlands" was found to be false and *Australian Competition and Consumer Commission v C.I. & Co Pty Ltd* [2010] FCA 1511 where the labels "Free Range" and "Fresh Range-Omega 3" for eggs from battery caged hens was found to be misleading and deceptive.

-
- ^{li} See, for example, Nestlé Limited, 'Nestlé Commitment on Farm Animal Welfare' < http://www.nestle.com/asset-library/documents/creating%20shared%20value/rural_development/nestle-commitment-farm-animal-welfare.pdf>, accessed on 31 March 2014.
- ^{lii} Pro Bono Australia, 'Consumer Disconnect on Animal Welfare – Survey' (10 December 2013) <<http://www.probonoaustralia.com.au/news/2013/12/consumer-disconnect-animal-welfare-survey>>, accessed on 2 April 2014.
- ^{liii} Ibid.
- ^{liv} Michael C. Appleby, et al., 'What price cheap food?' (2003) *Journal of Agricultural and Environmental Ethics* 16 p395.
- ^{lv} Farm Animal Welfare Committee, 'Economics and Farm Animal Welfare' (December 2011) p 17, < <http://www.defra.gov.uk/fawc/files/Report-on-Economics-and-Farm-Animal-Welfare.pdf>>, accessed on 27 March 2014.
- ^{lvi} Farm Animal Welfare Committee, 'Economics and Farm Animal Welfare' (December 2011) p 16, < <http://www.defra.gov.uk/fawc/files/Report-on-Economics-and-Farm-Animal-Welfare.pdf>>, accessed on 27 March 2014.
- ^{lvii} The Commonwealth of Australia, *Agricultural Competitiveness Paper* (2014), 30.
- ^{lviii} Clive J. Phillips, 'The Welfare of Livestock During Sea Transport' in Michael C. Appleby et al (eds), *Long Distance Transport and Welfare of Farm Animals* (CABI, 2008) 137, 139-40.
- ^{lix} Livecorp, Frequently Asked Questions, < http://www.livecorp.com.au/Facts_and_Stats/FAQs.aspx#12>.
- ^{lx} R Norris et al., 'Cattle Deaths During Sea Transport From Australia' (2003) 81 *Australian Veterinary Journal* 156-161.
- ^{lxi} Clive J. Phillips, 'The Welfare of Livestock During Sea Transport' in Michael C. Appleby et al (eds), *Long Distance Transport and Welfare of Farm Animals* (CABI, 2008) 137, 144.
- ^{lxii} Drummond, J. Et al., 'Exposure of Lambs to Atmospheric Ammonia' (1976) 42(5) *Journal of Animal Science* 1343; Clive J. Phillips, Matthew K. Pines and Tracy Muller, 'The physiological and behavioral responses of steers to gaseous ammonia in simulated long-distance transport by ship' (2010) 88 *Journal of Animal Science* 3579.
- ^{lxiii} Clive J. Phillips et al, 'The avoidance of ammonia by sheep' (2012) 7 *Journal of Veterinary Behaviour* 48.
- ^{lxiv} Department of Agriculture, Fisheries and Forestry, *Livestock Mortalities for Export by Sea* (12 September 2012) <http://www.daff.gov.au/animal-plant-health/welfare/export-trade/mortalities>.
- ^{lxv} Voiceless the animal protection institute, 'Live Export' < <https://www.voiceless.org.au/the-issues/live-export>>
- ^{lxvi} Ibid.
- ^{lxvii} Department of Agriculture, Fisheries and Forestry, *Exporter Supply Chain Assurance System (ESCAS)* (16 May 2012) <http://www.daff.gov.au/aqis/export/live-animals/livestock/escas>.
- ^{lxviii} World Organisation for Animal Health (OIE), 'Article 7.5.9. – Summary Analysis of Slaughter Methods and the Associated Animal Welfare Issues' in *Terrestrial Animal Health Code: Volume 1* (OIE, 19th ed, 2011) 353.
- ^{lix} For further information on the regulation of live exports, see RSPCA Australia, 'How is the live export trade regulated?' (13 January 2014), < http://kb.rspca.org.au/How-is-the-live-export-trade-regulated_107.html>, accessed on 2 April 2014.
- ^{lxx} Australian Government Department of Agriculture, *Regulatory Compliance Investigations*, <<http://www.daff.gov.au/biosecurity/export/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance>>, accessed 3 April 2014.
- ^{lxxi} Ibid, see outcomes of reports. Also see, for example, Voiceless the animal protection institute, *Animal Law in the Spotlight: Further Live Export Breaches*, < <https://www.voiceless.org.au/content/animal-law-spotlight-further-live-export-breaches>>

^{lxxii} Lonergan Research, WSPA Live Export Study Report (2012) 4-6.

^{lxxiii} Tim Jeanes, 'Animal lobby and meatworkers united against live exports' (21 July 2011), <<http://www.abc.net.au/news/2011-06-03/animal-lobby-and-meatworkers-united-against-live/2744170>>, accessed on 2 April 2014.

^{lxxiv} Five separate economic reports have confirmed that live exports are undermining Australia's meat processing industry — an industry five times more lucrative than live exports. The reports include: ACIL Tasman report, 'The Value of Live Sheep Exports from Western Australia', March 2009, prepared for RSPCA Australia; ACIL Tasman report, 'Australian Live Sheep Exports', September 2009, prepared for WSPA; S. G. Heilbron report, 'The Future of the Queensland Beef Industry and the Impact of Live Cattle Exports', June 2010, prepared for Teys Bros, Swift Australia and Nippon Meat Packers Australia; ACIL Tasman report, 'An economic analysis of the live exportation of cattle from northern Australia', October 2012, prepared for WSPA; and Sapere Research Group report, 'Economic impact of phasing out the live sheep export trade', March 2013, prepared for WSPA.

^{lxxv} See, for example, Ban Live Export, '10 reasons why the world won't end when live export does', <<http://www.banliveexport.com/features/10-reasons-world-wont-end.php>>, accessed on 2 April 2014.

^{lxxvi} Ibid.