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## **Submission to the Public Consultation on the Australian Standards for the Export of Livestock**

Vegan Australia is pleased to have the opportunity to provide input to the Review of the Australian Standards for the Export of Livestock. We hope this submission assists in the preparation of the final document.

Vegan Australia is a national organisation that informs the public about animal rights and veganism and also presents a strong voice for veganism to government, institutions, corporations and the media. Vegan Australia envisions a world where all animals live free from human use and ownership. The foundation of Vegan Australia is justice and compassion, for animals as well as for people and the planet. The first step each of us should take to put this compassion into action is to become vegan and to encourage others to do the same. Veganism is a rejection of the exploitation involved in commodifying and using sentient beings.

This public consultation is an opportunity for the community to reflect on the use of livestock in the agriculture industry. Every year over half a billion animals are bred, raised and killed in Australia for food, including millions exported live overseas. This consultation is an opportunity to consider alternative ways we can obtain food, including for export, which do not involve the suffering and killing of these animals.

It is important to emphasise that farmed animals suffer pain and their lives extinguished at a young age to produce products that are not necessary for human wellbeing. All these products can be replaced by plant-based alternatives.

### **Introduction**

Live animal export is horrific and must end. However, animals exported overseas make up less than 1% of all animals bred, raised and killed in Australia for food. We must help these animals as well. Vegan Australia is calling for a ban on live export of animals as part of a broader plan to phase out all animal use for food, clothing or any other purpose.

Animals are not ours to use. This includes livestock used in the live animal export industries. They value their own life and body and have an interest in continuing their existence and avoiding suffering. They should be treated with respect and justice and should not to be treated merely as commodities. Further, production of animal products necessarily results in their suffering and death.

In addition, humans have no need for any animal products and in particular are able to live healthily on a vegan diet. In fact, many people who adopt a nutritious vegan diet

will enjoy significant health improvements by reducing the risk of major killers such as heart disease, stroke, cancer and diabetes and reducing the health care burden from these chronic diseases.

In this submission, Vegan Australia attempts to show two things. First, that any agricultural system that uses animals (including including live animal export) will cause suffering to those animals. And second, that humans do not need to consume any animal products, as has been shown by extensive research in nutritional science.

We also propose significant changes to the agricultural system (including live export) in Australia. We believe that these proposals are in the best interests of the individual animals and support the primary objective of the standards, which is the health and welfare of animals who are to be exported live.

We note that the 2017 Victorian Animal Welfare Action Plan acknowledges that animals are sentient. There is a growing body of evidence that all animals, including mammals, birds and fish are sentient. This means they experience the world and have the ability to perceive and to feel pleasure, pain and a variety of emotions, both positive and negative.

We also note that the 2016 Regulation of Australian Agriculture Report by the Productivity Commission acknowledges that "there are some Australians who do not consider it appropriate to use animals for commercial purposes."

## **The goal of the live export standards**

One of the objectives of the standards is to maximise the health and welfare of livestock being exported.

In the interests of best protecting individual animals being exported (including cattle, sheep, goats, buffalo, deer and camelids), we propose that the goal of the standards should be the abolition of the breeding, raising, killing, exporting or any other use of farmed animals, whether for food, clothing or any other purpose. Every day over one million animals are slaughtered for food in Australia. This needs to stop.

The end goal of any animal welfare regulation should be to end all animal use by humans, in particular ending animal agriculture. This should be specified in these standards, which should also set out steps for the complete phasing out of live animal export. It should also specify a time scale for this process. We propose that a ten year phase out period be set for the end of animal agriculture and an immediate end to live animal export.

Recognition of the sentience of animals should be explicitly included and acted on in the standards, in a similar way to the New Zealand Animal Welfare Act which stipulates that it is necessary to 'recognise animals as sentient'. In other words, to recognise that animals can experience both positive and negative emotions, including pain and distress.

Ending live animal export will have the greatest benefit to the welfare of the individual animals involved. Anything less will mean their continued use, suffering and death. Our proposal is based on science and ethics as we discuss below.

While focused on minimising the risk to animal welfare, the standards will also require a broader range of measures and will need to call on a number of government departments, including agriculture, planning, education and treasury, to ensure an orderly transition to a fully plant-based agricultural system. The standards should continue the research begun by Vegan Australia into how a phase out of animal agriculture would affect a number of sectors, including land use, the environment, the economy, employment and human health. An economic impact assessment should be carried out, looking at how to phase out animal agriculture (including live export) with the least impact on the economy and employment. Note that the animal agriculture industry contributes only about 1.2% to the Australian economy. The live export industry makes up only 0.5% of Australia's exports and employment in the industry represents only 0.1% of total Australian employment. Over a ten year phase out period of animal agriculture, any dislocations should be manageable and alternative industries be set up. While much work remains to be done in ensuring a smooth transition to purely plant-based agriculture, doing so would be of benefit to Australia in the medium to long term, and, of course, of benefit to animals in the immediate term. See the research into moving to a vegan agricultural system carried out by Vegan Australia.

Any impact assessment process to be carried out for the standards must include the impact on animals. Merely assessing the impacts on the humans affected would ignore the intended beneficiaries of animal protection legislation.

The draft reports states that it is committed to "the improvement of animal welfare within the context of the continuation of the trade." We believe this a self contradictory statement. The welfare of any animal exported to be used and slaughtered overseas is clearly compromised if the trade continues. The members of the committee have been given an impossible task. The report also mentions community concerns that "the standards do not deliver acceptable animal welfare outcomes for exported livestock within a viable industry." We believe that a "viable" industry and acceptable animal welfare are mutually exclusive.

## **Rationale for phasing out animal agriculture**

The rationale behind the proposal to end the use of animals in agriculture is simply to avoid causing unnecessary suffering as much as possible.

All farmed animals suffer and they suffer in huge numbers. Currently over half a billion animals are bred and killed in Australia each year, with millions of animals exported live to be killed overseas. Some of the suffering endured by animals used for live export includes: lengthy sea voyages, death of thousands of animals at sea, heat stress, especially during summer months, transport through climatic zones of high temperature and humidity, rough seas, transport of pregnant animals, birth at sea, stress caused by land transport of thousands of kilometres, long periods of holding at feedlots and loading areas, crowded conditions on ships, transportation of heavy animals, unable to move freely or access feed and water, infectious bacterial diseases, inanition (inability to eat), high concentrations of ammonia gas.

After a life of suffering, all animals in the live export industry are killed at a young age, drastically cutting short their normal life span. Each animal values their life and doesn't want to die.

Breeding and killing farmed animals is not necessary. Humans don't need animal products to live healthy and fulfilling lives.

## **Wellbeing of farmed animals is not possible**

The wellbeing of animals and their commercial use in agriculture are incompatible.

Farmed animal welfare regulations, including for live export, are currently woefully inadequate and any possible future changes will never be enough to ensure the wellbeing of the animals. Currently, commercially farmed animals are exempted from the overarching anti-cruelty and duty of care standards included in animal welfare legislation. Horrific acts which cause great suffering and which are illegal to perform on domestic pets, are quite legal and standard practice for farmed animals. It is completely illogical that the same suffering can be inflicted on the same animal and yet the legality of the act depends on whether the animal is a family pet or a production unit on a farm. The laws allowing this are, in effect, legalising cruelty.

Current regulations are barely enforced and any 'improvements' would suffer the same fate.

It is clear that the animal production system could not economically survive if the same animal cruelty laws applied as for pets. The financial costs would be too high. And proposed "higher welfare" practices are only a little better than current standard practices and are constantly being degraded by the pressure of competition to make a profit.

Discussion and arguments about welfare improvements for animals in the live export industry are diversions from the real issue. The animal industry will fight and delay at every change. No amount of tweaking regulations will ever be enough. The only ethical solution is to end the use of animals in agriculture.

## **Use of credible scientific evidence about animals**

*Farm animals feel pleasure and sadness, excitement and resentment, depression, fear, and pain. They are far more aware and intelligent than we ever imagined ... they are individuals in their own right. ~ Jane Goodall*

Vegan Australia agrees with the emphasis the standards place on using credible animal welfare research and scientific evidence to determine animal policy. As the draft report states, "the committee is to consider all scientific knowledge submitted by stakeholders", ensure "the standards continue to be supported by the latest scientific research" and "the standards must be evidence-based." We also agree with the community concerns expressed in the draft report: "the standards are not based on the best available scientific evidence." As the draft report mentions, the Productivity Commission states that "standards must be based on credible science."

The evidence of animal cognition should be the primary factor in creating the standards. Scientific knowledge supports the common belief that animals are sentient, have emotions and can feel pleasure and pain. Animal welfare laws have existed for almost two centuries, so the fact that animals can suffer is not a new concept. This is supported

by the standards, which use words to describe inner subjective states, such as "extreme discomfort" and "distressed".

Scientific research has discovered that the pain and pleasure mechanisms in animals are very similar in all vertebrates, including humans. The pain-inhibiting mechanisms found in the human body are very similar to those found in other animals.

Professor of Bioethics at Princeton University, Peter Singer, states "it is surely unreasonable to suppose that nervous systems that are virtually identical physiologically, have a common origin and a common evolutionary function, and result in similar forms of behaviour in similar circumstances should actually operate in an entirely different manner on the level of subjective feelings."

Animal behaviorists have found that, given amenable conditions, farmed animals interact in socially complex ways, bonding with family members and developing friendships over time. They have "rich and deeply emotional lives". Raising animals in crowded conditions is very stressful to them because it upsets their social structure.

The Victorian Department of Primary Industries states that "all livestock species (and fish) have the necessary brain structures and nervous system to allow them to feel pain and suffer". In addition "all livestock species are capable of comprehending and desiring pleasurable experiences."

The report of the 2016 inquiry by the Productivity Commission into the regulation of agriculture states that "the welfare of animals is judged on the basis of: how well the animal is performing from a biological functioning perspective; affective states, such as suffering, pain and other feelings or emotions; the expression of normal or 'natural' behaviours." Observation suggests that none of these are met in any commercial agricultural system, especially in live animal export industry.

Both ethical considerations and credible science are important in determining welfare standards. These two concepts are not mutually exclusive. There is no conflict between the ethical consideration that it is wrong to inflict unnecessary suffering on animals and the scientific fact that farmed animals are sentient beings capable of suffering.

See more about animal sentience, emotion and behaviour here:

- Animal sentience, Voiceless (<http://www.voiceless.org.au/the-issues/animal-sentience>)
- The Someone Project, Farm Sanctuary (<http://www.farmsanctuary.org/learn/the-someone-project/>)
- Industrial farming is one of the worst crimes in history, The Guardian (<https://www.theguardian.com/books/2015/sep/25/industrial-farming-one-worst-crimes-history-ethical-question>)

Not only does science support the idea that farmed animals have emotional inner lives, but also they have complex social lives. Many live in stable social groups that demonstrate sophisticated social behaviour.

Vegan Australia suggests the those responsible for preparing the standards visit Edgar's Mission in Victoria and spend a few hours getting to know the stories behind the rescued

farmed animals, especially the many sheep, cattle and other livestock, who live there as valued individuals.

## **Use of nutritional science**

Science can also be used to show that humans have no need for farmed animal food products. In fact, there is a solid body of peer-reviewed scientific evidence to confirm that it actually benefits human health to consume a primarily plant-based diet. Changing to a plant-based diet can help people live a longer, healthier life, and significantly reduce risk of falling victim to many of the serious health threats facing Australians today.

Australia's peak health body, the National Health and Medical Research Council, recognises that a vegan diet is a viable option for all Australians. Australia's top health experts agree with those in other parts of the world that well-planned vegan diets are safe and healthy for all age groups. The Australian Dietary Guidelines state that alternatives to animal foods, such as nuts, seeds, legumes, beans and tofu, can "increase dietary variety and provide a valuable and affordable source of protein and other nutrients found in meats."

According to the US Academy of Nutrition and Dietetics, "Appropriately planned ... vegan diets are healthful, nutritionally adequate, and may provide health benefits for the prevention and treatment of certain diseases. These diets are appropriate for all stages of the life cycle, including pregnancy, lactation, infancy, childhood, adolescence, older adulthood and for athletes."

Not only are animal products unnecessary for optimal health, an increasing number of nutritionists and health professionals are acknowledging animal products are harmful to our health. This is supported by decades of good research. A healthy vegan diet helps reduce the risk of heart disease, stroke, cancer, obesity, and diabetes, some of Australia's top killers.

A recent issue of the Medical Journal of Australia, dedicated to the question "Is a Vegetarian [including vegan] Diet Adequate?", included the following statements. "A varied and balanced plant-based diet can provide all of the nutrients needed for good health." "Most vegans meet the recommended daily intake for protein." "Vegan diets generally contain just as much or more iron than mixed diets containing meat." "BMI and obesity was lowest for vegans."

The China Study by T Colin Campbell is one of the most comprehensive studies on nutrition ever done. Campbell provides compelling evidence linking animal products to disease, including cancer, heart disease, osteoporosis, diabetes, etc.

Every current vegan, by simply being vegan, proves that causing harm to sentient farmed animals is not necessary.

## **Public support for avoiding unnecessary suffering of animals**

Nearly all Australians believe that we should avoid causing unnecessary suffering to sentient beings as much as possible. As the draft standards state "animal welfare is becoming increasingly important to the general public."

The Stage 2 Issues Paper mentions that there is a "high level of community interest in the welfare of exported livestock" and that "the standards do not meet community expectations for the welfare of animals." We note that, according to the 2017 Victorian Animal Welfare Action Plan, there is strong public support for the welfare of animals, stating that 98% of Victorians rate protecting the welfare of animals as important or very important and 75% feel the welfare of animals should be better protected.

In addition, a 2010 survey found that "99% of Australians are against cruelty to animals". The survey also found that 54% of Australians believe that vegan diets can be healthy. It also found that 56% of Australians say there are one or more things that would encourage them to become vegan, including evidence that many farming practices cause stress and pain for millions of animals every year and evidence they can be healthy on a vegan diet. (A Pound of Flesh, Vegan/Vegetarian Society of Queensland)

Other surveys have also shown that most people oppose testing cosmetics on animals. In fact, there is now widespread political support to outlaw the sale of all products tested on animals. The reform will bring Australia into line with Europe and New Zealand. Although in a different arena, this shows that when acceptable alternatives exist most people will choose compassion over cruelty.

The 2016 ban on greyhound racing in NSW is another example where the majority of people actively oppose the unnecessary suffering of animals. One of the major concerns of people is "wastage" - the majority of dogs who are killed because they are no longer fast enough to win. In other words, dogs are bred to be used for the trivial reason of entertainment and then killed. Most people rightly felt outrage when learning of this practice. The parallels with animal farming are clear - farmed animals are bred to be used for the trivial reason of enjoyment of the taste of their flesh or secretions and they die in the process.

We also note the surveys mentioned in the report of the 2016 inquiry by the Productivity Commission into the regulation of agriculture: "A survey of Australians' relationships with animals found that '52 per cent of respondents thought that factory-farming methods of producing meat, eggs, and milk (which are becoming dominant trends) were cruel'" and "30 per cent thought that animals deserve the same rights as people to be free from harm and exploitation".

Most people agree that causing unnecessary suffering and death of any sentient being is wrong and we should not participate in it if we can avoid it. We believe that given the right information about 1) the sentience of animals, 2) the unavoidable suffering of animals in agriculture and 3) the scientific evidence that humans have no need for animal food products, then there will be widespread public support for the complete phasing out of animal agriculture, including the live export industry, in Australia.

## **Community expectations and education**

Vegan Australia agrees with the emphasis of the standards that animal welfare regulations should reflect community values and expectations. As indicated above, the community expects strong protection for animals. We also believe that the community needs to be more effectively educated about the suffering inherent in the live export industry, and about the fact that none of the products of the industry are necessary for

human health. The community must be fully informed in this area so they can make valid conclusions. Planning for this education should be part of the standards.

We propose that the standards include deliverables covering honest community education about animal agriculture and the lack of necessity for humans to consume animal products. The horrific realities of animal agriculture are unknown by many in the community due to the prevalence of miseducation beginning in childhood and continuing into adulthood. Some of this miseducation is perpetuated intentionally by supporters of the animal agriculture industry, however much of it is merely the passing on of falsities by well-meaning people. The situation is the same in the context of the belief that animal products are a necessary component in the human diet, despite this belief contradicting the Australian Dietary Guidelines and other major dietetic organisations globally. Failing to provide education informing Australians of the realities of animal agriculture and the lack of necessity of the consumption of animal products would result in a skewed community perspective.

This education is a prerequisite for gauging community values on animal welfare. Failing to do so would bias the process in favour of cruel and unnecessary practices that are not known about, or understood by, members of the general public.

The content of the education should be guided by the end goal of phasing out animal agriculture within ten years. No part of the education should lengthen this process by suggesting movements to intermediate "higher welfare" systems.

People's views can change rapidly when presented with new information. In the experience of Vegan Australia we have found that it can take as little as reading one book or seeing one video that can completely change people's attitudes to animals as food. Community awareness is growing and we expect it to accelerate.

At the moment, people's ethical concerns do not always match their consumption decisions. Many people believe it is unacceptable to deny the life and liberty of an animal without good reason but they continue to consume animal products. This behaviour is due to tradition, convenience, widespread promotion by the animal industries, lack of information about the treatment of farmed animals and lack of knowledge of non-animal alternatives. Vegan Australia believes that strong public education campaigns will be effective in rapidly changing people's understanding and behaviour.

## **Food labelling as education**

Consumers want to gain as much information about the products they are buying as possible. One of the aims of food labelling laws is to support consumer decisions about buying food products, including production processes. Misleading labels can result in consumers making choices that do not reflect their preferences.

Vegan Australia proposes that labelling of meat, dairy, eggs and other animal products must include an honest description of the suffering the animal endured during the production process. The current situation, where most labels contain no information about the treatment of the animals used in the production process, is deceptive and likely to mislead potential buyers.



The proposed animal suffering descriptions should be detailed listings.

Another form of this labelling could use the model of cigarette packaging which has a graphic image and a warning in bold such as "Cigarettes kill" or "Quitting will improve your health" and on the side of the pack a more detailed description. This should level the playing field somewhat. We are incessantly bombarded with dishonest marketing to purchase animal products and that should be countered to allow consumers to make informed rational choices.

We also propose that honesty in labelling be extended so that pictures of "happy" animals on animal products, such as "happy hens" on egg cartons, be replaced with a graphic description how the animal suffered and died very young.

## **Market forces as a way to implement welfare improvements**

The Stage 2 Issues Paper, in the section "What is the role for government?", mentions using market forces as a possible way to prevent animal suffering. This discussion is inappropriate. In no other area where the suffering of sentient beings (both human and animals) is in question would it be valid to allow the workings of the market to make choices. Even the Productivity Commission states that "animal welfare and profitability are not complementary because the market is largely unable to provide society with desired states of welfare."

## **No input to animal welfare standards from animal industries**

In order to remove the possibility of conflict of interest, those responsible for preparing the standards should only include those who represent animals and their interests. There should be no place for those who profit from the exploitation of these animals. To give representatives of the animal industries any say in the standards would continue the conflict of interest that occurs in the current ineffective process of setting animal welfare standards.

Currently most members of advisory groups developing standards are representatives of the agriculture industry and departments of primary industries, whose principal objective is promoting the agricultural sector. There is a clear lack of representation of the many Australians who realise that humans have no need to consume any animal products and so we should not be exploiting animals in any way. As the Productivity Commission report states "Animal welfare may be of secondary importance where the primary objective of the agency responsible for livestock welfare is to promote a productive and profitable agricultural sector." The report also mentions "concerns about significant input from bodies whose interests [are] described as 'essentially antagonistic' to those of animals."

## **Criticisms of calling for the end of animal farming**

While Vegan Australia has received good support for submissions such as this, we have received some criticisms, such as: we are unlikely to get everyone to go vegan, we are unlikely to convince the Australian government to ban animal agriculture, it sets us up for failure and not being taken seriously and so we should strive for a more achievable goal.

By "more achievable goal", people usually mean advocating for some sort of better conditions for the animals who are suffering now. We expect there will be a number of excellent submissions to this inquiry on this topic and we in no way want to undermine those. However we would like to point out that there have been animal cruelty laws for about 200 years and yet the conditions most farmed animals suffer under now are worse than ever. Rather than regulating animal use, a better way is to stop using animals in the first place. To advocate for anything less is to sell the animals short.

While Vegan Australia is one of the only organisations currently calling for the phasing out of animal agriculture, we expect to be soon joined by others. By calling for an explicit acknowledgement in animal welfare laws of the end goal of ending all animal farming, we are sending a clear and consistent message to the public that suffering is unavoidable in any agriculture system that uses animals.

## **Summary**

The aims of Vegan Australia are to help bring about a world where all animals live free from human use and ownership. In this submission we propose that the goal of the standards should be the complete phasing out of animal agriculture (including live exports) in Australia.

Animal welfare laws should not suggest "better" ways to force animals on lengthy sea voyages to be killed overseas. They should state that none of this should be necessary. They should give guidance on how to eliminate this industry and replace it with an industry based on compassion for animals, people and the earth.

Greg McFarlane

Vegan Australia