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National Pig Code Consultation
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Via email: animal.welfare@dpi.vic.gov.au

1 August 2006

Dear Sirs/Mesdames,

Submission concerning the Proposed '*Model Code of Practice for the Welfare of Animals – Pigs*'

Lawyers for Animals ('LFA') is a Melbourne-based organisation comprised of legal professionals and others with an interest in reducing and eliminating animal suffering. Our objectives include challenging weak animal protection laws and policies and working with industry, government and the community to bring about positive change and law reform for animals.

We hereby tender the following submissions concerning the Proposed '*Model Code of Practice for the Welfare of Animals – Pigs*'; released for public consultation on 1 June 2006.

In summary, our submissions may be classified under three main headings:

1. The economic rationale for 'family pen' and 'free range' pigmeat production in Australia – 'Differentiate or Perish';
2. The political rationale for Federal initiative and implementation of long-term strategies for Australian pigmeat production; and
3. The social and ethical rationale for positive changes in Australian pigmeat production.

However, before addressing each of the aforementioned submissions, we first wish to draw attention to a preliminary issue of utmost importance to the credibility and acceptance of this consultation process.

Inadequate public consultation and presentation of information concerning the Proposed Code

We note with serious concern the general approach adopted in the Consultation Draft of the Regulatory Impact Statement (“the RIS”) regarding the Proposed ‘Model Code of Practice for the Welfare of Animals – Pigs’ (“the Proposed Code”) which was prepared for the Primary Industries Standing Committee by Tim Harding and Associates, and circulated in late-May 2006. We submit that the value of the RIS, and that of the consultation process surrounding it, is thoroughly undermined by its apparent failure to consider the views of the largest number of stakeholders in Australia’s pigmeat production: the Australian people.

Between 1 July 1999 and 30 June 2002, the Australian Commonwealth, is estimated to have expended several million dollars of public revenue to promote the Australian pork industry, including a voluntary exit program for unproductive pig farmers.¹ In 2003-2004, around \$145 million of income tax revenue was forgone by the Australian Commonwealth through income tax concessions to livestock producers (including pigmeat farmers)². In October 2005, the Federal Government confirmed a 26 million dollar commitment (over seven years) to the development of an Adelaide-based ‘Pork Co-operative Research Centre’.³ Through income tax concessions to pigmeat producers and the funding of promotional programs for the pigmeat industry, the Australian people are subsidising pigmeat production to the tune of tens of millions of dollars. In 2003, the OECD estimated that 3.59% of the gross incomes of Australian pigmeat producers, were attributable to the monetary value of transfers from Australian taxpayers.⁴

In addition to their purely financial stake in pigmeat production (outlined above), each member of the Australian population who consumes pigmeat has an additional interest in the product they are consuming: they may be expected to take an interest in the quality, safety (from a health perspective) and ethical provenance of the meat that they buy. A survey conducted by ‘Meat and Livestock Australia’ in 2000 found that the reported importance of “...animal welfare and cruelty to animals...” to Australians had increased from 29% to 54% between 1994 and 2000.⁵ Further, even members of the Australian population who do not consume pigmeat – whether for religious, ethical or other reasons – also have a social and ethical stake in the kinds of pigmeat production utilised in Australia. Just as any Australian

¹ Between 1 July 1999 and 30 June 2002 the ‘National Pork Industry Development Program’ cost Government and industry (collectively) \$11.6 million, while within the same period, the ‘Pork Producer Exit Program’ cost Government and industry (collectively) \$3.1 million, while the ‘Porkbiz Program’ cost Government and industry (collectively) \$1.1 million – from Productivity Commission ‘Australian Pigmeat Industry’ Report No. 35, Melbourne 2005, pp.243, 245 & 246, quoted in Sherman, B. et al ‘From Paddocks to Prisons: Pigs in New South Wales – Current Practices, Future Directions’, Voiceless, December 2005, p.26 (“Voiceless Report”)

² Productivity Commission ‘Australian Pigmeat Industry’ Report No. 35, Melbourne 2005, p.248 quoted in Voiceless Report (n.1 above), pp.26-27 – please note: no separate figures for pigmeat producers appear to be publicly available.

³ The Hon. Peter McGauran MP ‘\$80 million invested for industry innovation’ Press Release, 18 October 2005 quoted in Voiceless Report (n.1 above), p.26

⁴ OECD Report 2004, quoted in Voiceless Report (n.1 above), p.25 n.184

⁵ Meat and Livestock Australia ‘Animal Welfare Issues Survey 2000’, March 2002, quoted in Voiceless Report (n.1 above) p.7

citizen may take an altruistic interest in child protection laws – whether they be a parent or not – so too, non-consumers of pigmeat have a right to contribute their opinions, and constructive ideas, to the debate about pig farming methods.

Yet the public's view on these matters has either not been properly sought by the relevant authorities – most notably, public attention has not been drawn to the consultation process, or to the crucial issues requiring decision, by any Government advertising campaign⁶ – or has effectively been stifled through notional 'publication' of the consultation process on the internet, directing the public to a preferred response questionnaire which, in turn, discourages the expression of opinions by those who are not pigmeat producers, by inferring that their views are irrelevant. Had such a questionnaire been produced in a neutral (or psychologically non-manipulative) manner, then there would be less reason for complaint. For instance, had the questionnaire asked the respondent to list his/her economic, social or ethical interests in pigmeat production, rather than asking for his/her personal employment history in the pigmeat industry; a perception of impartiality might have been maintained (at least, in the questionnaire). However, as it stands, the questionnaire is merely further evidence of an industry-bias within the consultation process, similarly reflected in the failure to recognise the importance of the wider public's opinions, within the RIS.

We submit that by largely ignoring, or effectively excluding, the wider population from consideration, in relation to the Proposed Code, through limited efforts and time given to engaging the public's response on critical issues, the RIS and the consultation process, itself, is fatally flawed. The RIS refers to "...extensive consultation [having] taken place with industry and animal welfare organisations in the development of the proposed national code."⁷ It goes on to state that "The proposed minimum standards of the model code are largely agreed amongst the various stakeholders except for the 'dry sow stalls' issue, which is the only issue having significant on-going cost implications."⁸ We beg to differ.

We refer to the recent public responses by Animal Welfare organisations such as 'Animals Australia' and 'Voiceless' to the Proposed Code⁹, and note that in addition to their strong opposition to the continued use of dry sow stalls (in place of which they promote alternative 'family pen' or 'free range' housing/breeding systems), these organisations are also strongly opposed to the proposed minimum standards relating to:

⁶ We note that the Federal Minister, The Hon. Peter McGauran MP, does not appear to have responded to, let alone met, the challenge recently laid down by Australia's foremost animal ethicist, Professor Peter Singer, that the Minister present images of Australia's intensive pig farms – particularly those depicting farrowing crates and dry sow stalls – to the Australian public for their comment, before such structures are approved for continued long-term use, as they are under the Proposed Code – see: <http://www.saveababe.com/petersinger.html>

⁷ Primary Industries Standing Committee, 'Proposed model code of practice for the welfare of animals – Pigs, Regulatory Impact Statement, Consultation Draft' 2006 ("RIS"), p. iii

⁸ Ibid, p. v

⁹ Animals Australia see: <http://www.animalsaustralia.org/default2.asp?idL1=1269&idL2=1937> & Voiceless see: <http://www.voiceless.org.au/media-section/media-releases/unhappy-as-a-pig-out-of-mud-the-prognosis-under-australias-proposed-new-pig-code-of-practice.html>

- teeth clipping, castration and tail docking without anaesthetic or pain relief;
- the discretionary denial of hay or other bedding and ‘rooting’ (nosing) materials to pigs for the entirety of their lives, including the denial of nesting materials to sows during ‘farrowing’ (birthing) and to piglets, even immediately following their birth; and
- the use of confined ‘farrowing crates’ for sows.

Evidently, the “...extensive consultation... with... animal welfare organisations...” claimed by the authors of the RIS involved their largely ignoring the views of those organisations, when framing the RIS. The statement within the RIS that “The proposed minimum standards of the model code are largely agreed amongst the various stakeholders except for the ‘dry sow stalls’ issue...” is not only highly misleading, but is flatly contradicted by other sections within the report recording the views of the two animal welfare organisations whom the authors did consult: Animals Australia¹⁰ and the RSPCA.¹¹ With such internal contradictions present within the RIS, we submit that the credibility of this draft report is severely compromised.

Having, perhaps conveniently, eliminated so many other issues from contemplation, the authors of the RIS go on to focus almost the entirety of their report on the issue of dry sow stalls. In doing so, they effectively fail to see the forest for the trees: by relying on dubious¹² numerical estimates of the compliance costs of phasing out the use of sow stalls over ten years, and comparing those estimates with figures (plucked out of the air?) purported to represent the net benefits to animal welfare of the various alternative housing systems. In fairness to the authors of the RIS, they do acknowledge “...the inherent inability to quantify benefits to animal welfare.”¹³ However, having said that, they go on to conduct a ‘weighted criteria decision analysis’ seemingly regardless of the glaring flaw within the numerical data upon which they rely for the analysis. We submit that the authors of the RIS should not have attempted to compare apples with oranges, but ought to have examined the bigger picture, including the potential marketing advantages of more ethical pigmeat production, both within local and export markets.

¹⁰ Opcit RIS at pp.9-10

¹¹ Opcit RIS at pp. 11-12

¹² In particular, we query the productivity figures relating to reduced numbers of pigs weaned per sow per annum under systems not utilising sow stalls (see Table A6.3C, opcit RIS, p.80). This and other productivity figures are stated to derive from “a survey conducted for APL [Australian Pork Limited] January/February 2006” (opcit RIS p.79) which is, in turn, attributed to Pearson, A. ‘Additional information for Pig Code RIS (2)’ personal communication. We query the impartiality and accuracy of this information and note that it is directly contradicted by a three-year German study by Spitschak, K. & Franke, W. ‘Outdoor keeping of sows and piglets – more than only an alternative’ *Archiv für Tierzucht* 1997 Vol.40 p.35-40, quoted in opcit Voiceless Report, p.22, which concluded that the reproductive performance of outdoor sows was equal to that of indoor sows. A similar study in Australia found that “... where management and stockmanship are good, the productivity of alternate housing systems can compete with and exceed that of conventional confinement housing for sows without compromising sow welfare.” Frey, B. ‘Sow performance in different housing systems’ Paper presented to the 9th Biennial Conference of the Australasian Pig Science Association, Fremantle, Australia, quoted in Voiceless Report (n.1 above), pp.22

¹³ Opcit RIS (n.7 above), p.32

The setting of a two-month limit on public consultation, after around three months delay in the publication of the Proposed Code and the RIS, is extremely disappointing and, once more, indicative of a possible intention to stifle public discussion and debate around the issues of pigmeat production in Australia. We submit that the time for public response to the Proposed Code ought be extended by at least three months to allow adequate debate and publication of the various issues.

We reiterate our objection to a flawed consultation process and submit that such a process ought be immediately revised, to allow further time for public consultation and broader publication of the real issues involved in pigmeat production, so as to inform the public about what has been kept quiet for many years, as pigs were herded from the paddocks to the factories. Indeed, we argue that such publication is likely to benefit local pigmeat producers in the longer-term, by raising awareness of the potential humane differences that Australian pigmeat producers could implement, to distinguish their product from increasing North American imports.

The economic rationale for 'family pen', 'hooped roof' and 'free range' systems of pigmeat production: 'Differentiate or Perish'

As noted above, the North American export of pigmeat products to Australia and to our traditional export markets (in Asia) is potentially the greatest threat facing our local producers in the next decade. With Australia's acceptance of the Australia-United States Free Trade Agreement which took effect from 1 January 2005, and a recent High Court ruling that has cleared the way for further international pigmeat imports¹⁴, the economies of scale represented by the USA (and, to a lesser extent, Canada) mean that Australia cannot now expect to compete on a level playing field – or to beat the Americans at their own game. The large-scale efficiency of grain production and meat processing in North America, which has a combined population of around 330 million, means significantly lower production costs for pigmeat producers there.¹⁵ In addition, the recent breakdown of talks between the G6 nations over global trade, conducted in Doha, India, make it more likely that the higher subsidies paid to Canada and Denmark¹⁶ will continue indefinitely. Canada and Denmark are currently the main suppliers of imported pigmeat products in Australia, with Australia being the 11th largest pigmeat importer during 2004.¹⁷ The breakdown of trade talks in Doha may also signify a continuation of high tariffs protecting Japanese and Taiwanese producers against Australian pigmeat exports.¹⁸ Thus, if Australian pigmeat producers are to survive and prosper in a world where they experience minimal tariff and subsidy protection relative to many of their competitors, they will need to differentiate their product. They will need to be smarter.

¹⁴ Australian Pork Ltd. v Director of Animal and Plant Quarantine & Others, High Court of Australia, 18 November 2005 – special leave to appeal from an earlier judgement by the Federal Court of Australia [2005] FCA 671 was refused by the High Court.

¹⁵ OpCit Productivity Commission 'Australian Pigmeat Industry' Report No. 35, Melbourne 2005, p.41 quoted in Voiceless Report (n.1 above), pp.25

¹⁶ Ibid, 'Australian Pigmeat Industry' Report p.xxiv, quoted in Voiceless Report (n.1 above), pp.25 n.184

¹⁷ Ibid, 'Australian Pigmeat Industry' Report pp. 24 & 26, quoted in Voiceless Report (n.1 above), pp.24

¹⁸ Ibid, 'Australian Pigmeat Industry' Report pp.xxxviii & xxix, quoted in Voiceless Report (n.1 above), pp.25 n.183

With various studies reporting equivalent productivity but potentially lower capital costs for the creation of free-range pig farms as opposed to intensive farms¹⁹, the potential economic benefits of more humane pigmeat production ought soon become obvious. A degree of inertia may be expected from some of the larger, intensive pigmeat producers, who have invested heavily in woefully confined indoor stall and crate systems, due to Government inaction. The largest producer, QAF Meats Pty. Ltd. which accounts for 20% of Australia's total pigmeat production (and is wholly foreign owned)²⁰ has virtually acknowledged the necessity for reform, recently noting the improved body condition, reduced leg and feet problems and higher immunity of gestating sows in deep-litter, group housing systems.²¹

Several reports now confirm the comparable productivity of family pen and free-range pig farms, in terms of the numbers of healthy piglets produced per sow – in contrast to information contained within the RIS that was sourced solely from Australia's peak pigmeat production body.²² Further, Australia has an abundance of relatively flat, well-drained land with ideal climatic conditions for pig-farming.²³ Indeed, the present wine glut may yet see vast swathes of shady vineyards uprooted, if alternative uses cannot be found. Hence, it is our submission that the costs of phasing in alternative systems including family pens (to allow redesign of existing indoor farms), and free-range, hooped-roof pen production systems ought not be nearly so great as the draft RIS presently states.

Local and international examples of pigmeat and other livestock products that have been successfully differentiated on the basis of more humane and healthy production methods, abound. The organic meat sector leads the trend toward healthier meat consumption²⁴, and with growing public concern about the antibiotic treatments applied to intensively farmed/battery animals²⁵, the organic industry seems set to expand. In the United Kingdom, where sow stalls have been banned since 1999²⁶ (except during the first

¹⁹ See n. 12 above (2 reports) and also Wechsler, B. 'Rearing pigs in species-specific family groups', *Animal Welfare* 1996 Vol.5 pp.25-35 – quoted in *Voiceless Report* (n.1 above), p.20

²⁰ QAF Meat Industries 'Welcome' company website, 11 July 2005 – quoted in *Voiceless Report* (n.1 above), pp.29

²¹ Morrison R.S. & Johnston L.J. 'Deep-litter, group-housing systems for gestating sows', QAF Meat Industries, unpublished report presented at the 2005 Conference of the Australian Association of Pig Veterinarians, Gold Coast, Australia – quoted in *Voiceless Report* (n.1 above), pp.21

²² See n. 19 above (3 reports)

²³ According to *Voiceless Report* (n.1 above), pp.21: "Soil should be light and free draining to avoid becoming water-logged. A low rainfall is desirable. The land should not contain steep slopes which can erode. Pigs must have protection from extreme weather and heat stress so shelters and tree-belts are important. On good land, 15-20 sows may be kept per hectare." At a productivity rate of 21.4 piglets per sow (opcit Wechsler n.21 above), that allows for up to 428 piglets to be produced, per annum on a single hectare of suitable land.

²⁴ See for example: Lewis, P. 'Old-fashioned pigmeat tantalises taste buds', *Landline*, 3 April 2005 quoted in *Voiceless Report* (n.1 above), pp.28 n.204 and also note the 1000% increase in revenue to Australia's organic industry (from \$28m to \$300m) from 1995 to 2005 - quoted in *Voiceless Report* (n.1 above), pp.7

²⁵ *Voiceless Report* (n.1 above), p.24 n.173

²⁶ *The Welfare of Livestock Regulations 1994 & The Welfare of Farmed Animals (England) Regulations 2000* quoted in *Voiceless Report* (n.1 above), pp.10 n.46

4 weeks of a sow's pregnancy), 'Berkshire Pork' has found a developing luxury market in Japan, despite the high tariffs.²⁷

Since Australia already trades on its 'clean, green' reputation (attained prior to the factory farm revolution of recent years) and our disease-free status in international fresh-produce markets,²⁸ a marketing campaign to sell genuinely 'clean' pigmeat to Asia is likely to confirm and build upon Australia's status as a major pigmeat exporter. That is unless we lag far behind the trend to humane farming already set by the European Union²⁹ and by our progressive neighbour, New Zealand.³⁰ The Proposed Code, in its current form, would cause Australia to undertake a Soviet Union-style freeze on production standards³¹, with similar dire economic and social consequences flowing. We submit that Australia ought not miss this opportunity to modernise and upgrade our pigmeat production methods to meet the demands of the 21st Century.

The political rationale for Federal initiative and implementation of long-term planning

We are aware that some noted animal welfare organisations have argued for State-initiated legal change in relation to pigmeat production, to ensure the enforceability of minimum standards of care.³² Their reasons for doing so are pragmatic: under Australia's Constitution, the States have taken responsibility for the enforcement of general animal welfare laws, and there is pre-existing State Prevention of Cruelty to Animals ("POCTA") legislation, which, in some States (including NSW – Australia's largest pigmeat producer) currently invites Federal jurisdiction by referring to the Federal Model Code relating to pigs.³³

However, we urge the Federal Government to initiate this urgently needed reform of Australia's pigmeat production methods, and to actively encourage all States and Territories to incorporate a revised Model Code within their own POCTA, to ensure that Australia's international reputation as a 'clean, green' producer of livestock is not undermined by the action or inaction of a single, recalcitrant State or Territory. We submit that a federal approach is required to ensure uniformity in the treatment of animals as well as the treatment of pigmeat producers across Australia. We submit that uniform production

²⁷ Associated Press 'Hog farmers eye breeds for tastier pork' Forbes.com 16 May 2005 quoted in Voiceless Report (n.1 above), pp.28 n.203

²⁸ Voiceless Report (n.1 above), p.24

²⁹ The European Union's Council Directive 91/630/EEC (as amended by Council Directive 2001/88/EC and by Commission Directive 2001/93/EC) has seen a ban on new sow stalls since 1 January 2003, with a phase out of existing stalls by 1 January 2013 – with the exception that sows may be kept in stalls during the first four weeks of pregnancy, only – from Voiceless Report (n.1 above), p. 10 incl. n. 39

³⁰ New Zealand has followed the EU's example, after a four-year review process culminating in the enactment of the New Zealand Animal Welfare (Pigs) Code of Welfare 2005 – sow stalls are to be phased out by 2013, except in relation to sows in their first four weeks of pregnancy – from Voiceless Report (n.1 above), p. 10 incl. n. 51

³¹ The Soviet Union, and other Eastern European nations that fell under Soviet control, are widely acknowledged to have fallen far behind their Western economic counterparts during the majority of the 20th Century in terms of their industrial innovation and production standards – see, for example: Encyclopaedia of the Nations - <http://www.country-data.com/cgi-bin/query/r-12814.html>

³² See for example: Voiceless Report (n.1 above), pp.11-13

³³ Voiceless Report (n.1 above), pp.5 & 11

standards will benefit the Australian economy and avoid opportunistic competition between States for markets which all of Australia might otherwise compete for fairly.

Moreover, we note that in the absence of Federal action on this crucial issue, State action to initiate productivity and welfare reforms in piggeries within their boundaries, may prove inevitable. This could render the Federal Government's Code irrelevant, even in those States which currently choose to incorporate the Code within their POCTA. One recent instance where a State Government took decisive action in the face of Federal Government inertia, was that of Victoria, where the Bracks Labor Government recently announced renewable energy targets in a desperate bid to prevent the loss of renewable energy technologies from Australia (and from Victoria, in particular).³⁴ We submit that reform of the production standards relating to pigs in Australia is inevitable, both for economic and ethical reasons, and that unless the Federal Government immediately demonstrates adequate leadership in this field, several States are likely to disengage from their existing acceptance of the Federal Model Code. This, in turn, could prove highly detrimental to Australia's long-term economic interests, in terms of promoting our international reputation for uniform, high standards of production.

The social and ethical rationale for positive changes in Australian pork production

We submit that several of the minimum standards set within the Proposed Code would not only prove highly detrimental to Australia's economy, in the middle to longer term, but would also impart great shame upon our people, for perpetuating the gross cruelty that our political representatives presently allow to exist.

Even as this submission is read, around 260,000 mature breeding sows in Australia will either be held in, or awaiting confinement (during part or all of their 4 month pregnancy) in pens that measure about 50-60 centimetres wide and 2 metres long (far too narrow to turn and too short to allow more than a single step in either direction), with concrete or metal slatted floors, and no environmental enrichment (such as hay, straw or bracken) to allow their natural behaviours to be expressed and their boredom to be alleviated.³⁵ Around 90% of those sows who are presently housed in either sow stalls or farrowing crates (which are 10 cm narrower than stalls) are likely to engage in repetitive, pointless behaviours (known as 'stereotypies') around 50% of the time that they are so confined (which is usually around five and half months – 22 weeks – at a time) commencing twice a year.³⁶ These 'stereotypies' – ordinarily viewed as signs of madness in humans – include such self-destructive behaviours as bar-biting, endlessly nosing the feed trough or the concrete floor (often causing lesions to develop on the snout), as well as less

³⁴ See: medial release 17 July 2005
http://www.dpc.vic.gov.au/domino/Web_Notes/newmedia.nsf/8fc6e140ef55837cca256c8c00183cdc/2716fe821cdeeb84ca2571af00030fb3!OpenDocument

³⁵ From: <http://www.savebabe.com/petersinger.html> and Voiceless Report (n.1 above), p.16

³⁶ Voiceless Report (n.1 above), pp.14-17

destructive behaviours such as tongue rolling, head swaying, chewing air and pressing the drinker with their snouts.³⁷ These purposeless behaviours rarely develop in free-range animals and usually take some weeks to develop and then increase in intensity during the period of confinement. They do not ease with time.³⁸ In view of the fact that pigs may be considered to be socially and intellectually comparable to dogs (or even to apes in relation to their complex problem-solving capabilities), confinement of such duration and intensity has profound effects on their mental stability and wellbeing.³⁹

In stark contrast to the sow stall system of production, free-range piggeries such as the Great Southern Outdoor Pig Company in Albany, Western Australia (which houses some 3000 sows on just 1500 acres); prove that pig farming need not be unnecessarily cruel to be productive and successful.⁴⁰ We urge the Federal authorities to amend the Proposed Code to adopt the phasing out of existence of sow stalls in favour of family pens, free-range and hooped roof structures, by 2013 (in line with European Union and New Zealand transition plans). We ask that the authors of the RIS review their findings concerning the productivity and adjustment costs of such a transition to humane farming, to ensure that false information does not impede the future development of the Australian economy or improvements to animal welfare.

In addition to the major issue of sow stalls, we strongly recommend that the following minimum standards replace those contemplated in the Proposed Code:

- that teeth clipping, castration and tail docking only be conducted under adequate anaesthetic with pain relieving medication to be administered immediately following any such procedures and continued until pain is no longer evident in the animal concerned;
- that hay, straw or other bedding and 'rooting' (nosing) materials be regularly supplied to sows, boars and piglets throughout the entirety of their lives, in such quantities as would allow each individual animal to construct a nest at any particular time;
- that 'farrowing crates' be phased out of existence by 2013 in favour of natural birthing and 'mothering' by unconfined sows; and
- that all pigs be provided with sufficient bulky or high fibre feed to satisfy their natural appetite.

We hope that by 2020, all Australians may look back on this period in our history with a sense incredulity and shame, and experience the pride of knowing that we have recovered our international reputation for our 'clean, green and humane' production practices. We note that it makes strong economic sense, as well as ethical sense, to undertake this reform now, before we fall too far behind other progressive nations.

³⁷ Voiceless Report (n.1 above), pp.15-16

³⁸ Voiceless Report (n.1 above), pp.16

³⁹ Voiceless Report (n.1 above), pp.8-9 & 15-17

⁴⁰ See case study reported in Voiceless Report (n.1 above), pp.23

Should the Consultative body responsible for reviewing this submission have any queries or require any further information, please do not hesitate to contact Nichola Donovan of LFA, via telephone during business hours: 03 9483 1141. We look forward to any response that the Consultative body may provide.

Yours faithfully,

Lawyers for Animals Inc.