

The Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
CANBERRA ACT 2600

10 March 2009

Dear Secretary

RSPCA Australia supplementary submission to meat marketing inquiry - labelling

RSPCA Australia welcomes the Committee's decision to extend the meat marketing inquiry to include the issue of labelling of meat products and, in particular, appreciates the opportunity to provide the Committee with a supplementary submission on the issue of "the use of labels 'organic' and 'free range' across all meat products".

Lack of consistent definitions

As consumer awareness and demand for more humanely farmed animal-derived food products grows¹, consumers need to be able to make an informed choice about the products they purchase. However, product information on the conditions under which the animal was farmed is either lacking or provided through ambiguous labelling.

Although the Committee's inquiry is seeking input on the use of 'organic' and 'free range' labels for meat products only, the issue of inconsistent labelling extends across all animal-derived food products and needs to be addressed.

Existing definitions

The Committee will be aware of terminology used to denote the production method of eggs, e.g. 'cage', 'battery', 'barn laid', 'free range', 'open range', 'range', and 'grain fed'. Terms to indicate production method of meat products include 'grain fed', 'free range', 'bred free-range', 'organic' and 'biodynamic', to name a few. The open interpretation of these terms and their often arbitrary use on food labels has led to increasing consumer confusion and uncertainty.

The degree to which the term 'free range' or 'organic' is left open to interpretation can be demonstrated by the information provided to pork producers:

- The *Model Code of Practice for the Welfare of Animals: Pigs* describes "outdoor" systems in which pigs are housed "free range in paddocks with shelter such as arks or huts". Space recommendations for housing weaners, growers and finishers range between 0.03m² to 0.74m² per animal ; dry sows kept outdoors: 20-25 sows per hectare; and lactating sows with piglets 9-14 sows per hectare.

¹ Research from the Institute of Grocery Distribution in the United Kingdom shows that concern about animal welfare and knowledge of animal welfare issues rose from 29% in 2006 to 45% in 2008 (IGD, 2009, Shopper Trends 2009: Food Shopping in a Recession, Institute of Grocery Distribution, Watford, United Kingdom).

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- The *Free Range Pork Farmers Association* standards require that pigs “be allowed free movement and access to pasture”. Space requirements for housing small, medium or large pigs range between 1.5-3.0m² per animal. Outdoors, stocking density should not exceed 20 sows per hectare.
- The *National Standard for Organic and Bio-dynamic Produce* standards state that “livestock must be managed to ensure they range freely on pasture.” Space requirements for housing small, medium or large monogastric animals range between 1.5-3.0m² per animal.

What is required are definitions that plainly and unambiguously describe the housing system provided and the range of conditions under which the animals have lived. Definitions should provide clear direction to producers and give consumers the confidence that certain minimum standards have been met.

Achieving nationally consistent definitions

A first step to achieving nationally consistent definitions is to ensure that all terms used to describe specific production methods are incorporated into the relevant Australian standards for the welfare of animals. These standards specify essential requirements that must be met under law to satisfy the animal’s basic welfare needs. Terms to describe production method would need to encompass descriptions of facilities, production processes, and the animals themselves². The Australian standards therefore provide an ideal means to define agreed terms that identify the production method used.

The ACT and Tasmania have taken additional steps to ensure that consumer confidence in these terms is guaranteed. The ACT were the first to enact legislation - *Eggs (Labelling and Sale) Act 2001* - that clearly defines the conditions under which hens are kept. Tasmania followed suit in 2002 with their *Egg Industry Act* which will require producers to meet certain labelling criteria.

Labelling of eggs according to production method is a good example of how terms that describe agreed minimum requirements for production method are helping consumers to choose between the conventional cage egg and higher welfare barn or free-range eggs which now make up 25-30% of the retail market share.

From nationally consistent definitions to accurate labelling of animal-derived food products

Legally defined, nationally consistent definitions describing method of production would form the basis of a food-labelling scheme in which consumers could have the utmost confidence that certain minimum animal welfare standards have been met in the production of that food. Such a labelling scheme could be either voluntary or mandatory.

A voluntary labelling scheme would be effective where a progressive producer, retailer or producer group adopts agreed labelling terms to identify their production method, and where others follow suit. With this approach, products are positively labelled, e.g. ‘free range’, ‘organic’, or ‘bred free-range’, based on these definitions. Consumers will conclude that unlabelled products are from conventional production systems.

A voluntary labelling system needs to be underpinned by a quality assurance scheme that is both robust and credible, and that has auditable animal welfare standards in place from birth to slaughter. Of

² Thompson, P., Harris, C., Holt, D. and Pajor, E.A., 2007, Livestock welfare product claims: The emerging social context, *Journal of Animal Science*, 85(9): 2354-2360.

importance to the consumer is that such standards are publicly available so that they can be reassured that the method of production meets their expectations.

Freedom Food is an example of a successful voluntary labelling scheme monitored by RSPCA UK that offers whole-of-chain certification and approves well-managed free-range, organic and indoor farms. The scheme's logo is clearly recognisable on a wide range of beef, dairy, pork, sheep meat, poultry and fish products. The scheme has over 2200 members who adhere to Freedom Food's strict, yet practical and achievable, animal welfare standards. Freedom Food products are available at all major retailers. RSPCA Australia has a similar accreditation program covering eggs and pork product and will soon be expanding into chicken meat.

The main difference between a voluntary labelling scheme and a mandatory labelling scheme is that the latter would require that not only the terms to define production methods are incorporated into legislation, but that there is additional legislation that requires such terms to be included in animal-derived food product labelling (as has been done in the ACT and Tasmania for eggs, for example). Such a labelling scheme could be progressed through Food Standards Australia New Zealand (FSANZ) and would require changes to three standards: those relating to food identification requirements; meat and meat products; and egg and egg products. Given that the FSANZ Act 1991 has among its objectives "the provision of adequate information relating to food to enable consumers to make informed choices" and "the prevention of misleading or deceptive conduct" it is clear that accurate production system labelling falls well within the mandate of FSANZ.

In the opinion of the European Economic and Social Committee on Animal Welfare labelling:

"Mandatory minimum animal welfare standards should be backed up by voluntary labelling rules that can be used in combination with both general commercial labels and more quality-based labels, not least among them quality schemes.

A market-based system based on objective criteria to quantify animal welfare will be more flexible, effective and future-oriented than politically imposed criteria and will therefore be better suited to future developments in production and marketing."³

Religious slaughter

RSPCA Australia believes that the slaughter of fully conscious animals is inhumane and completely unnecessary. A mandatory labelling scheme is urgently required for meat products that are derived from animals that have not been stunned prior to slaughter. Consumers have the right to be able to choose not to purchase a meat product that does not meet the standard slaughtering practices expected by the Australian community. See Attachment A for a copy of the letter sent to Minister Tony Burke on this important issue.

In summary

Nationally consistent definitions that underpin an agreed labelling scheme, either voluntary or mandatory, will relieve producers and others in the livestock sector of the uncertainty and pressure that comes with uncoordinated and unregulated labelling schemes and production standards.

³ EESC, 2007, Opinion of the European Economic and Social Committee on Animal Welfare - Labelling, NAT/342, European Economic and Social Committee, Brussels, Belgium.

Labelling also allows producers to differentiate their product and attract a growing number of discerning consumers. Products produced to higher welfare standards, and clearly labelled as such, will and do attract a premium over those products that are not.

The result of successful labelling schemes - be they mandatory or voluntary - is increased consumer confidence in the products they purchase and, as demand grows, an increase in the level of animal welfare in the livestock production sectors, the key objective of the RSPCA.

Recommendations

RSPCA Australia recommends that the Committee:

1. initiate a discussion about production method definitions with producers, producer groups, brand owners, retailers, consumer groups and the RSPCA;
2. recommend that the Government ensure that nationally consistent definitions of terms to describe production method are included as standards in the relevant Australian Standards and Guidelines for the Welfare of Animals;
3. investigate the feasibility of implementing either a voluntary or mandatory labelling scheme in the Australian context; and
4. recommend that the Government ensure that meat product derived from animals not stunned prior to slaughter are clearly labelled.

Sincerely



Heather Neil
Chief Executive Officer
RSPCA Australia

Encl: Attachment A: Letter from RSPCA Australia to Minister Tony Burke regarding religious slaughter

ATTACHMENT A

3 March 2009

The Hon Tony Burke MP
Minister for Agriculture, Fisheries and Forestry
Parliament House
CANBERRA ACT 2600

Dear Minister

RSPCA Australia's position on ritual slaughter without prior stunning

In September 2008, RSPCA Australia provided the then General Manager of the Animal Welfare Branch with our comments on the Australian Government's review of animal welfare risks during ritual slaughter. We understand that a recommendation is due to be considered by PIMC at their next meeting in April. Before a decision is made, RSPCA Australia would like to be assured that you are aware of our views.

Our policy on humane killing of animals is unambiguous :

- RSPCA Australia defines humane killing as when an animal is either killed instantly or instantaneously rendered insensible to pain until death supervenes.
- RSPCA Australia is opposed to all inhumane methods of killing notwithstanding religious dogma and ethnic custom.

This policy reflects our primary concern as an animal welfare organisation, which is to prevent cruelty to animals and, in the case of slaughter animals, prevent injury, suffering or distress prior to slaughter. It is important to note that slaughter is the final step in a series of events that are generally considered extremely stressful to animals, namely mustering, loading, transport, unloading, and mixing with unfamiliar animals in unfamiliar environments. It is therefore crucial that the moments immediately prior to slaughter do not cause additional and unnecessary suffering or distress.

With regard to slaughter of a fully conscious animal, our key concerns relate to the potential for pain and/or distress during pre-slaughter handling and restraint; the neck cut; and the time to loss of brain responsiveness. It is our view that the potential risk to the welfare of the animal during each of these stages is such that **slaughter without prior stunning is simply inhumane**.

We recommend that the current exemption under the *Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption*, which allows for animals to be ritually slaughtered under an approved arrangement, be **withdrawn**. We trust that a satisfactory arrangement can be made with religious authorities that will allow the use of stunning prior to slaughter.

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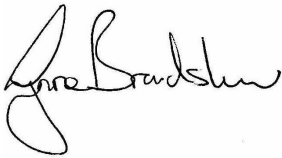


Certainly, we see **no need for the continuation of ritual slaughter for the purpose of satisfying export market requirements and believe this practice should cease immediately.**

Although the numbers of animals slaughtered without prior stunning may be relatively small, there is no official segregation of such meat from meat slaughtered in the conventional manner. This means that it is possible that consumers may inadvertently buy meat slaughtered using a ritual method. RSPCA Australia believes that **all such products should be clearly labelled so that consumers are able to exercise choice** and avoid meat that does not meet standard slaughter practices expected by the Australian community.

RSPCA Australia believes that the slaughter of fully conscious animals is inhumane and completely unnecessary and we trust that you will support our view on the absolute need for pre-stunning for all slaughter animals regardless of purpose.

Sincerely



Lynne Bradshaw
President
RSPCA Australia