



Department of Agriculture
Fisheries and Forestry
Climate Change Branch

Via consultation portal

13/12/2023

World Animal Protection submission on the Agriculture, Land and emissions discussion paper

World Animal Protection is a global animal welfare organisation with offices in 13 countries and a presence in many more. We work to end cruelty to animals and promote policies that follow the One Health approach that human health, animal health and environmental health are intrinsically linked. We welcome the intent to develop sector decarbonisation plans in Australia and the government's actions to reduce Australia's greenhouse gas emissions. Climate Change is one of the greatest threats to animals and humans globally and we strongly advocate for all governments to ensure temperatures are kept below 1.5 degrees above pre-industrial levels.

Our submission on this discussion paper (the Paper) will address the measures outlined to reduce livestock emissions. The Paper notes that emissions from enteric fermentation by ruminant livestock and livestock waste accounts for approximately 78.5 per cent of total sector emissions, which is approximately 13.2 per cent of total national greenhouse gas emissions. The task of reducing these emissions will be significant.

The Paper positions methane-inhibiting feed supplements for ruminants as the primary means of reducing livestock emissions and provides an overview of work done to date on their development and deployment. We do not have an objection to these technologies being independently and rigorously tested, although we note that early trials have included some where reductions were less than hoped for¹. There is also the question of whether the technology will be ready, and financially viable, in the timeframe

worldanimalprotection.org.au

Level 2, 120 Christie Street St Leonards, NSW 2065

T: +61 (0)2 9902 8000 F: +61 (0)2 9906 1166 E: info@worldanimalprotection.org.au

World Animal Protection limited (formerly WSPA Australia Limited) ABN 19 083 297 027



required. While the sector plan's objective will be achieving net zero emissions by 2050, substantial reductions will need to be made well before then to avoid dangerous climate change. As a potent greenhouse gas, emissions of methane must be reduced substantially in the near future.

Consideration of feed supplements must also acknowledge the possibility of negative animal welfare outcomes from their widespread use. Trials so far have primarily been conducted on feedlots, where supplements are easier to administer. Yet most of Australia's livestock range over large areas without frequent contact with farmers, making it harder to administer such supplements. The Paper notes this: "*Australia's expansive pasture-based production systems present a particular challenge in terms of delivering supplements to grazing livestock.*"

While research is being undertaken into ways of administering supplements to free grazing livestock, it seems likely that the need to provide frequent, reliable doses of feed supplements to cattle could see them spend more time on feedlots. This could be a negative animal welfare outcome, as feedlots can compromise their welfare². Almost half of Australian cattle spend part of their life on a feedlot, and trends show that this percentage is steadily increasing³. Feedlots are barren, often lack shade and offer no engagement with the natural environment or the ability to engage in foraging behaviours and other physical activities that are essential to the physical and emotional wellbeing of cows. The animal agriculture industry both here and overseas is moving to reduce or eliminate confinement of animals in recognition of the animal welfare consequences. An emissions reduction solution that potentially incentivises increased confinement of cattle, and thus compromises their welfare, should be approached with caution and is inconsistent with a One Health approach.

Solutions for administering supplements outside of feedlots may also have potential animal welfare consequences. Suggestions have included providing 'licks' on farms or scattering pellets⁴. The potential for non-ruminant native animals to ingest these substances must be investigated to ensure there are not adverse health consequences.

A heavy reliance on feed supplements would also not address emissions from manure, which the Paper notes are a considerable contribution to the agriculture sector's overall emissions. It would also not address the

worldanimalprotection.org.au

Level 2, 120 Christie Street St Leonards, NSW 2065

T: +61 (0)2 9902 8000 F: +61 (0)2 9906 1166 E: info@worldanimalprotection.org.au

World Animal Protection limited (formerly WSPA Australia Limited) ABN 19 083 297 027



greenhouse gas emissions from ongoing land clearing for animal agriculture. As an animal welfare organisation with a One Health approach, we must also note the impact that this clearing has on native animals, as one of the most impactful threatening processes for native species⁵.

The Paper is silent on the potential for plant-based, cell-based and precision fermented food products to assist in reducing emissions by providing alternatives to animal protein products that would see fewer ruminant animals farmed while also providing jobs and revenue opportunities for the Australian agriculture sector. Given the current uncertainty about the efficacy, timing and cost of feed supplements, a prudent approach would involve consideration of all existing, and emerging, options and technologies.

The market for these products both in Australia and overseas is already significant and will grow in coming decades. The CSIRO's 2022 protein roadmap for Australia, developed with government and industry, identifies a \$13 billion domestic and export market opportunity for Australia. Key to the strategy were ten growth opportunities that included plant-based products and ingredients, precision fermentation and cultivated meat⁶.

These alternative products should not be seen as a threat to the profitability of Australia's agriculture industry or the Australian economy, but a profitable diversification of it. Many existing animal protein companies, or companies who sell animal protein products, already partner with or invest in alternative protein companies or are developing alternative protein products, both in Australia and overseas. As an example, Norco, Australia's oldest dairy cooperative, has partnered with venture capital firm Main Sequence and the CSIRO to back Eden Brew, a start-up that uses precision fermentation to produce alternative dairy products. The investment will provide a new source of revenue for Norco's 326-member dairy farmers⁷.

We urge the Federal Government to examine providing funding and support for companies developing animal protein alternatives as an option to help reduce greenhouse gas emissions from the agriculture sector while maintaining the sector's profitability.

We would be happy to provide additional information or answer questions on any of the issues raised in this submission. Please contact [REDACTED].

worldanimalprotection.org.au

Level 2, 120 Christie Street St Leonards, NSW 2065

T: +61 (0)2 9902 8000 F: +61 (0)2 9906 1166 E: info@worldanimalprotection.org.au

World Animal Protection limited (formerly WSPA Australia Limited) ABN 19 083 297 027



¹ <https://www.mla.com.au/research-and-development/reports/2023/p.psh.1353---effect-of-asparagopsis-extract-in-a-canola-oil-carrier-for-long-fed-wagyu-cattle/>

² <https://kb.rspca.org.au/knowledge-base/what-are-the-animal-welfare-issues-with-feedlots-for-cattle/>

³ https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/trends--analysis/lot-feeding-brief/mla_lot-feeding-brief_november-2023_101123.pdf

⁴ <https://agriculture.vic.gov.au/support-and-resources/newsletters/sheep-notes-newsletter/spring-2022/feed-supplements-to-reduce-methane-emissions>

⁵ Murphy H & van Leeuwen S (2021) *Australia state of the environment 2021: biodiversity*, Commonwealth of Australia, Canberra <https://soe.dcceew.gov.au/sites/default/files/2022-07/soe2021-biodiversity.pdf>

⁶ <https://www.csiro.au/en/work-with-us/services/consultancy-strategic-advice-services/csiro-futures/agriculture-and-food/australias-protein-roadmap>

⁷ <https://www.csiro.au/en/research/production/food/eden-brew>

worldanimalprotection.org.au

Level 2, 120 Christie Street St Leonards, NSW 2065

T: +61 (0)2 9902 8000 F: +61 (0)2 9906 1166 E: info@worldanimalprotection.org.au

World Animal Protection limited (formerly WSPA Australia Limited) ABN 19 083 297 027