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World Animal Protection Submission to the Draft Climate Change Assessment Requirements and Guide

World Animal Protection welcomes the opportunity to provide feedback on the Draft Climate Change Assessment Requirements and Guide on behalf of ourselves and our supporters, who care deeply about the welfare of Australian animals.

Background

We welcome the inclusion of animal agriculture in the EPA Guide for Large Emitters. The role of food systems, particularly red meat production, in driving climate emissions is a topic of global importance. It is equally clear that there is a need to address animal agriculture wholistically in discussions about climate change.

As an animal welfare organisation, World Animal Protection can provide unique perspectives and insights into animal agriculture production systems, their impact on native wildlife, climate, and farm animal welfare. Because our organisational focus lies primarily with the high-density, industrial farming methods found in cattle feedlots, we have chosen to focus our comments on the feedlot sector with the understanding that the climate implications of pasture-raised beef raise their own significant concerns.

We support the application of this policy to cattle feedlots given the well-documented link between livestock emissions and the generation of methane¹². Conservative estimates indicate that Australia's beef and sheep sectors are responsible for ten percent of national greenhouse gas emissions³. This includes, among other factors, enteric methane production and methane generated by animal waste, which is often stored in uncovered lagoons.

These calculations are complicated by the well-documented uncertainty regarding the number of cattle in the Australian herd as well as the beef industry's role as a primary driver of land clearing and deforestation in Australia. Recent reporting has uncovered that the herd counts for Australian cattle are grossly inaccurate. Initially, it was believed that there could be as many as 10 million more cows on the Australian landscape than previously reported⁴. More recent surveys have

¹ World Resources Institute, "Creating A Sustainable Food Future," 2019

² M. Crippa, E. Solazzo, D. Guizzardi, F. Monforti-Ferrario, F. N. Tubiello and A. Leip, "Food systems are responsible for a third of global anthropogenic GHG emissions," *Nature Food*, vol. 2, pp. 198-209, 2021

³ <https://www.mla.com.au/globalassets/mla-corporate/research-and-development/documents/cn30-information-sheet-final.pdf>

⁴ <https://www.theguardian.com/australia-news/2024/mar/11/how-many-cattle-are-there-in-australia-we-may-be-out-by-10-million>



indicated that the number may be closer to 4 million, representing a 20% increase in the amount of methane previously attributed to the beef industry.⁵

We are submitting these comments with the goal of achieving a higher standard of transparency and accountability regarding the welfare of animals raised for their meat as well as all animals impacted by the worsening effects of climate change.

Climate accountability is of utmost importance as beef producers, investors, the public and governments navigate a complex landscape of emerging climate change mitigation strategies. The climate, environmental and welfare impacts of livestock agriculture, in particular, are being increasingly scrutinised by other stakeholders, both nationally and internationally.

In addition, unlike other sectors, climate mitigation strategies employed by the animal agriculture sector may have unique implications and risks. Cows, sheep, pigs and other animals are not combustion engines; they are living sentient beings whose health and welfare must be incorporated into plans and policies that impact their lives. Climate mitigation strategies that rely on altering an animal's DNA, diet, reproductive rates, and other bodily processes must not violate best practices for animal welfare. Animals are not machines and their welfare should not be compromised as part of any climate change mitigation strategy.

While we applaud the Department for its thorough draft, we have proposed comments and specific recommendations about aspects of this draft, summarised below:

Recommendation 1: Animal welfare considerations and the avoidance of animal harm should be built into requirements for the development of emissions mitigation plans. The adoption of best-practice mitigation strategies should not compromise animal welfare and should be reviewed by animal welfare experts.

Recommendation 2: The department should consider animal welfare implications in the design and implementation of policy and programs.

Recommendation 3: Cattle feedlots with the capacity to feed 11,000 cattle or above should be considered large emitters.

Recommendation 4: The Greenhouse Gas Mitigation Plans for Large Emitters should be made public in line with other environmental assessment and mitigation plans.

⁵ <https://www.theguardian.com/australia-news/article/2024/jun/17/australia-cattle-undercounted-methane-gas-reporting-abs#:~:text=A%20comparison%20using%20the%20previously,higher%20than%20previous%20ABS%20estimates.>



Best Practice and Animal Welfare

Unlike other large emitters, the majority of scope 1 and 2 emissions from the agriculture sector are produced by enteric methane emissions and biological waste from sentient living animals. Many industry proposed mitigation strategies for these emissions require technologies that modify the biological functioning of these living animals. These may include selective breeding and diets for accelerated growth, early weaning and breeding and increased fecundity of breeding females^{6,7}. Selecting for multiparous births has even been proposed as a means to increase the efficiency of cows raised for meat⁸.

There is evidence to support the fact that breeding and feeding cattle for higher liveweights can have negative animal welfare implications that are difficult to manage and are generally considered unacceptable to the public. These include: susceptibility to heat stress⁹, lameness¹⁰ and liver abscess¹¹. There is also a lack of longitudinal data regarding the welfare impact of feed additives intended to reduce enteric methane emissions on the health of cattle.

The welfare implications of increased pregnancies, early weaning and multiparous births should all be considered through an independent framework of animal welfare before being sanctioned as a climate change mitigation strategy. If a mitigation strategy is found to be at odds with the best practice animal welfare recommendations, it should be noted in the GHG Mitigation Plan as well as the Climate Change Mitigation and Adaptation Plan and discouraged unless all other high-welfare options have been attempted.

We believe this is best achieved by requiring an independent animal welfare assessment as part of the development any GHG Mitigation and Climate Change Mitigation and Adaptation Plan that relates to livestock agriculture. While we understand that the development and application of animal welfare assessments would most likely fall under the authority of the Department of Primary Industries, we urge the Government engage in a process of public comment or targeted consultation with animal welfare stakeholders during the initial establishment of related assessment criteria.

This level of transparency and consideration would align with public expectations. A 2018 Futureeye study found that an overwhelming percentage (95%) of the public is concerned about the treatment of farm animals and considers farm animal welfare in Australia to be an issue to some degree. More than a quarter of the respondents believe it is a serious issue, and a substantial

6 <https://www.csiro.au/en/news/all/articles/2022/august/australian-red-meat-stakes-claim-for-carbon-neutral-future>

7 [https://www.dpi.nsw.gov.au/dpi/climate/Low-emissions-agriculture/carbon-farming-fundamentals/emissions-reduction-pathways/livestock-industries/methane_emissions#:~:text=Higher%20fertility%20means%20that%20fewer,breeding%20season%20\(nutritional%20flushing\).](https://www.dpi.nsw.gov.au/dpi/climate/Low-emissions-agriculture/carbon-farming-fundamentals/emissions-reduction-pathways/livestock-industries/methane_emissions#:~:text=Higher%20fertility%20means%20that%20fewer,breeding%20season%20(nutritional%20flushing).)

8 <https://www.publish.csiro.au/an/pdf/AN23088>

9 <https://link.springer.com/article/10.1007/s00484-011-0433-6>

10 <https://aab.copernicus.org/articles/64/177/2021/>

11 https://brill.com/view/journals/jaee/4/2/article-p151_4.xml?language=en



percentage believe that the agricultural industry is not transparent about its practices and the Australian federal government is not ensuring animal welfare on farms¹².

To mitigate the risk of adverse animal welfare impacts arising from climate mitigation measures and to ensure that the outcomes of this policy remain in line with community expectations, we recommend the following:

- That animal welfare considerations and the avoidance of animal harm should be built into requirements for the development of emissions mitigation plans;
- The adoption of best-practice mitigation strategies should not compromise animal welfare and should be reviewed by animal welfare experts; and
- The department should consider and prioritise animal welfare in the design and applications of any policy intended to mitigate the impact of animal agriculture on climate change.

Proposed Threshold for Consideration

There are differing opinions in the research regarding the threshold at which a feedlot qualifies as a large emitter. According to a 2023 report by the Climate Change Authority, “Livestock emissions from feedlots with a capacity of greater than 11,000 head of cattle could also exceed the facility threshold of 25,000 t CO₂-e.”¹³ This differs from industry research commissioned by MLA Australia, which indicates that feedlots of 14,000 cattle would likely meet the requirements of a large emitter.

¹⁴

Based on the Climate Change Authority’s calculations, we recommend that the EPA consider all feedlots in New South Wales that exceed an 11,000 head capacity to be classified as large emitters. It’s also vital that the assessment applies to the cumulative total of the operations, including existing facilities as well as new construction and expansion plans. This includes calculations of enteric methane emissions as well as methane generated by animal waste and a feedlot’s exposure to deforestation.

¹² 4 Futureye (2018) “Commodity or Sentient Being? Australia’s Shifting Mindset on Farm Animal Welfare”, DAWR, Canberra

¹³ <https://www.climatechangeauthority.gov.au/sites/default/files/documents/2023-12/2023%20NGER%20Review%20-%20for%20publication.pdf>

¹⁴ Chen, D., Bai, M., Denmead, O.T., Griffith, D.W.T., Hill, J., Loh, Z.M., McGinn, S.M., Muir, S., Naylor, T., Phillips, F. and Rowell, D. (2009). Greenhouse gas emissions from Australia beef cattle feedlots, Meat and Livestock Australia, North Sydney, NSW.



Transparency

Increased awareness of, and demand for, ethical products and services by consumers in Australia and other key markets have prompted increased market scrutiny of animal welfare and other ethics-based claims. Internationally, investors are starting to consider businesses' performance on animal welfare when making investment choices. Transparently monitored and reported on standards will become increasingly important for Australian products in premium international markets.

To this end, we recommend the Greenhouse Gas Mitigation Plans for Large Emitters should be made public.