



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Australia

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**SUBMISSION ON THE CRIMINAL CODE
AMENDMENT (AGRICULTURAL PROTECTION)
BILL 2019**

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A. *About PETA Australia*

People for the Ethical Treatment of Animals (PETA) Australia is the local affiliate of the world's largest animal rights organisation, PETA US, which has over 6.5 million members and supporters worldwide. PETA is dedicated to establishing and protecting the rights of all animals, and operates under the simple principle that animals are not ours to eat, wear, experiment on, use for entertainment or abuse in any way.

PETA Australia works through public education, cruelty investigations, research, lobbying, celebrity involvement and protest campaigns to focus international attention on the exploitation and abuse of animals for their flesh, for their skins, as living test tubes in laboratories, and for "entertainment".

B. *General Comments on the scope of PETA's response to the Bill*

1. The Legal and Constitutional Affairs Legislation Committee has invited a submission from PETA and is seeking submissions from the public on the proposed Criminal Code Amendment (Agricultural Protection) Bill 2019. PETA's comments on the Bill are below.
2. PETA's submission is not a comprehensive response regarding all the inadequacies in or concerns with the Bill. In providing comment on the Bill, PETA is taking the opportunity to comment in a general manner on the issues most concerning to it that arise from the Bill. Omission to comment on any particular aspect or proposed clause should not be taken to indicate PETA's satisfaction with or endorsement of that element.
3. PETA does not engage in nor incite unlawful activity, and does not engage in conduct that would form the bases for the criminal offences or penalties ostensibly contemplated by this Bill. However, we do have concerns with its potential chilling effect on the exposure of animal suffering and consumer access to information as well as the intentions, explicit and implicit, apparent from the introduction of this Bill.
4. The Prime Minister told a farmers' summit on 18 July that he expected that this Bill would pass within two weeks.¹ Since the closing date for submissions to this Inquiry is 31 July and the committee's report on the Bill is not due until 6 September, even allowing for some bluster and some fudging of the math, this raises some questions. Did the PM lie to the farmers? Did he cough through the words "the lower house"? Is he not aware that his government's own Bill has been referred to committee? Does he not understand the basics of the journey of a Bill referred to committee for review? Or, he well understands the process but views this inquiry as a placatory sham perhaps? We must proceed on the basis that submissions to this inquiry will be digested and considered in good faith and we have done so.

C. *Comments on the stated objectives of the Bill*

The areas of exposure purported to be addressed by this Bill have been stated throughout the supplementary materials and associated media coverage as: privacy, public health and food safety, biosecurity, and farmers' and farming families' safety. Our thoughts on the likelihood of the Bill providing additional protection in these areas, in addition to whether additional protections are warranted, are as follows:

¹ See Rosemary Bolger, 'Morrison wants trespass laws targeting animal activists passed within two weeks', *SBS News*, 18 July 2019, accessible at <https://www.sbs.com.au/news/morrison-wants-trespass-laws-targeting-animal-activists-passed-within-two-weeks>.

1. *Privacy*

As expressed by the Prime Minister in advocating for these new laws, “Farmers should not be subjected to the illegal invasion of their property and their privacy.”²

No landowner nor business operator enjoys an inherent right to, or to allow those on their property to, engage in illegal activity and expect the protection of privacy law simply because the crimes against animals are being committed on private property. Indeed, as the High Court noted in the seminal *Lenah Game Meats*³ case, landowners do not enjoy an inherent right to engage in *legal* activity on their property and automatically expect the protection of privacy law – as Gleeson CJ explained, activists who had trespassed onto private property to place cameras that recorded the operations of a possum slaughterhouse had not recorded activities that were

relevantly private. Of course, the premises on which those activities took place were private in a proprietorial sense. And, by virtue of its proprietary right to exclusive possession of the premises, the respondent had the capacity (subject to the possibility of trespass or other surveillance) to grant or refuse permission to anyone who wanted to observe, and record, its operations. The same can be said of any landowner, but it does not make everything that the owner does on the land a private act. Nor does an act become private simply because the owner of land would prefer that it were unobserved. The reasons for such preference might be personal, or financial. They might be good or bad. An owner of land does not have to justify refusal of entry to a member of the public, or of the press. The right to choose who may enter, and who will be excluded, is an aspect of ownership. It may mean that a person who enters without permission is a trespasser; but that does not mean that every activity observed by the trespasser is private.⁴

The way the animals raised and killed for their bodies to be turned into food and fibre products is a matter of public concern. Privacy arguments are not a justification for introducing additional bulked-up offences aimed at quashing the flow of information to consumers simply because that information is gathered in animal factories located on private property.

2. *Biosecurity*

More than half the antibiotics imported into Australia are fed to farmed animals⁵ to stave off disease that absent the drugs would thrive in the crowded, filthy living conditions the stressed animals endure. Industry has been taken to task by antimicrobial resistance experts over its lack of transparency about the prevalence of antibiotic use.⁶ Regardless, living in the conceit for a moment that Australian animal factories are in fact pristine, delicately balanced domes of sterility: activists entering such facilities are acutely aware

² See ‘Morrison Government delivers to protect farmers’, Media Release 4 July 2019, accessible at <https://www.attorneygeneral.gov.au/Media/Pages/morrison-government-delivers-to-protect-farmers.aspx>, accessed 12 July 2019.

³ *Australian Broadcasting Corporation v Lenah Game Meats Pty Ltd* [2001] HCA 63; 208 CLR 199

⁴ At [43].

⁵ See eg ABC Science, ‘Antibiotics use in agriculture’, accessible at <https://www.abc.net.au/science/slab/antibiotics/agriculture.htm>, accessed 1 July 2019.

⁶ See eg Melissa Davey, ‘Secrecy surrounding antibiotic use on Australian farms sparks superbug fears’, *The Guardian*, 21 September 2016, accessible at <https://www.theguardian.com/australia-news/2016/sep/21/secrecy-surrounding-antibiotic-use-on-farms-sparks-fears-of-superbugs>, accessed on 1 July 2019.

that if nothing else they will be accused of compromising the animals' health by tracking in outside bacteria. Therefore, participants commonly don full hazmat suits including sterile booties, gloves, and hoods, none of which are reused between areas or facilities.⁷ It's also worth noting that in the context of "farms" such as battery cage sheds surgical masks serve the dual purpose of helping to maintain biosecurity and providing at least some relief against the suffocating levels of ammonia that reportedly make it hard to breathe for a human present for a short amount of time. Spare a thought for the chickens breathing this biosecure air for most of their existence.

3. *Public health and food safety*

- a. In arguing for this Bill on the basis that activists entering onto land used to raise or kill animals may threaten food safety, proponents further perpetuate the mythology of a pure, hazard-free production environment and supply chain. Food safety is inarguably an issue of public safety. But this logically lends itself to an argument against rather than for further restricting consumers' access to information about the realities of what is happening to animals on agricultural land. Consider the example of a facility that continually encourages or allows its workers to beat sick, non-ambulatory cows to force them to stand and proceed to slaughter, a practice documented multiple times over several states in the US which led to the largest meat recall in US history.⁸ The public food supply is threatened in such a situation, but no slaughterhouse owner would or did share such information. The revelations of course came from an animal protection group. Revelations of systemic abuse only ever come to light due to the efforts of activists to expose them – as Mr Porter puts it in his second reading speech, acting to "disclose animal cruelty or mistreatment or other criminal activity where it might exist",⁹ though of course he confines his concession to a fortuitously restricted type of whistleblower. The greyhound racing industry had been merrily live-baiting for years before activists exposed the practice by, yes, trespassing onto private land to gather documentation. We see time and again that those profiting from a practice will simply never choose to expose it.
- b. Further it is not a supportable argument to say that state RSPCAs, state agricultural departments, the police, and in some contexts other equivalently tasked entities are sufficient monitors of the state of animal agricultural practice. Such bodies are by their own admission woefully under-resourced and unable to thoroughly investigate and pursue action regarding all complaints they receive, let alone comprehensively audit the treatment of animals used by animal enterprises. In the 2013/14, 2015/16, and 2017/18 reporting periods, the RSPCA finalised prosecutions on well under 1% of the complaints it investigated,¹⁰ obviously only some of which looked to the more than half a billion farmed animals in Australia. As we know from the constant flow of revelations of farmed

⁷ Personal correspondence with open rescue activist, July 2019.

⁸ See eg Christopher Doering, 'Humane society finds more downer cattle abuse', *Reuters*, 26 June 2008, accessible at <https://www.reuters.com/article/us-usa-cattle-humane-society/humane-society-finds-more-downer-cattle-abuse-idUSN2548579020080625>.

⁹ Christian Porter MP, Second reading speech, 4 July 2019, accessible at https://www.aph.gov.au/Parliamentary_Business/Hansard/Hansard_Display?bid=chamber/hansardr/ce759aa1-47bf-467d-a58b-3bf640990032/&sid=0078, accessed 12 July 2019.

¹⁰ See RSPCA Australia, 'RSPCA report on animal outcomes from our shelters, care and adoption centres 2013-2014', accessible at http://www.rspca.org.au/sites/default/files/website/The-facts/Statistics/RSPCA_Australia-Report_on_animal_outcomes-2013-2014.pdf, 'RSPCA report on animal outcomes from our shelters, care and adoption centres 2015-2016', accessible at <https://www.rspca.org.au/sites/default/files/RSPCA%20Report%20on%20animal%20outcomes%2015-2016.pdf>, and 'RSPCA report on animal outcomes from our shelters, care and adoption centres 2017-2018' accessible at <https://www.rspca.org.au/sites/default/files/RSPCA%20Report%20on%20Animal%20Outcomes%2017-2018.pdf>, accessed 4 July 2019.

animal abuse, this is not for lack of criminal activity occurring – it is simply because the empowered agencies or departments are hamstrung or inadequately equipped.

We acknowledge that activists exposing and documenting conditions at facilities exploiting animals are sometimes doing so by violating trespass laws. However apart from the fact that criminal offences already exist to address the issue we would also emphasise that animal suffering would continue unabated in many areas without such documentation being created and coming to light. Facilities will for the most part only be scrutinised if evidence of welfare violations is presented to the authorities. Animal activists gathering that evidence are an essential part of the transparency and accountability process. When industry and government makes improvements to the ways animals are treated, it is not born of altruism, but rather public demand. Raising and killing animals in ways that threaten food safety is indeed a public safety issue. Consumers have a right to make choices based on all the information that can be made available to them, and it is repeatedly demonstrated by the nature of disclosures made by activists that risks to public health and food safety are disclosed, not aggravated, by their documentation practices.

- c. The Statement of Compatibility with Human Rights incorporated into the Explanatory Memorandum (EM) argues that this Bill is compatible with the right to health contained in article 12 of the ICESCR which states that “all people have the right to the ‘highest attainable standard of physical and mental health’, and that State Parties should take measures necessary for the ‘improvement of all aspects of environmental and industrial hygiene’”. The EM goes on to note that the UNCESCR has expounded upon the parameters of this right and has observed it extends into the arenas of nutrition, access to potable water, safe and healthy working conditions, and a healthy environment. The Bill claims compatibility with this right on the basis of food safety and preservation of biosecurity. For the reasons above we would challenge such claims. But we would also point out that given that the increased risks to health from the consumption of animal products are well-known, that the environmental damage done by animal agriculture is inarguable, that recalls of various foods because of contaminations caused by animal agriculture are frequent, and that slaughterhouse work has some of the highest rates of physical and mental injury around,¹¹ the compatibility of seeking to “further deter” activists who draw attention to the realities of animal agriculture with this right is questionable.
- d. Finally, we would flag the tension here between the common complaint of agricultural industries that “city dwellers” are becoming increasingly disconnected from their food and clothing sources and that they just don’t understand what happens on the farm, and the apparent desire behind this Bill to limit consumers’ ability to have all the possible information about the realities of farming available to inform their choices. It is a glaring discrepancy between what farmers say they want the public to know about their practices and what they do, when industry wishes public perception of animals’ experiences to be limited to whatever they might glean from marketing materials. Querulousness in the face of increased testing of those claims is telling.

¹¹ See eg Richards et al, ‘A Different Cut? Comparing Attitudes towards Animals and Propensity for Aggression within Two Primary Industry Cohorts – Farmers and Meatworkers’, *Society & Animals* 21:4 (2013), accessible at <https://doi.org/10.1163/15685306-12341284>.

4. *Farmers' safety*

- a. Both politicians¹² and industry association heads¹³ have condemned activists' entry onto agricultural properties most vigorously on the basis that owners' homes may also be located on these properties, and that farmers fear home invasion and threats to personal and familial safety. It's certainly a seductive focal point – “[t]he Morrison government is committed to keeping Australian farmers and their families safe”¹⁴ – goodness, who would look askance at efforts to that end?
- b. Firstly, no farmers operating intensive facilities on many hundreds or thousands of acres have their broiler sheds outside the kitchen window or sow stalls set up next to the swing set. One farmer running 5,000 acres noted that “[t]hese are people's homes” but also highlighted the quandary thus: “We are spread over a large area ... how do we know who's entering our property?”¹⁵ It is hard to accept the bona fides of someone expressing apprehension of activists nearing let alone entering a residence in such a context.
- c. Secondly, there is not a single instance on record of such an irruption ever having occurred anywhere in the nation. Cries of “They're coming for your children in their beds!” despite the utter absence of evidence that they ever have or ever will is destructive fearmongering for which government and industry bear responsibility, not activists seeking to expose harm and suffering rather than cause it. The Morrison government is either anticipating an onslaught of nefarious activity with scant precedent or has believed campfire bogeyman tales of physically threatening acts that never in truth transpired.
- d. Or, more cynically, this Bill is politically rather than legally motivated and Coalition pandering at its most ugly – as Labor put it, “a government trying to play themselves into an issue because they think it's a popular thing to do”.¹⁶ Given that the Morrison government knows criminal laws addressing this conduct already exist to protect business owners and deter activists, the intent of introducing these additional offences is arguably to communicate to the public that they have something to fear from those who protest or document animal suffering. The promotion of steps like the introduction of this Bill work to convert an unreasonable fear into a reasonable one by conveying to the public that animal rights activists are a tangible physical threat and that that threat must be met with increased criminal penalties. Since as noted above there is no basis in reality from which to create such an impression, the basis must be manufactured, through means such as the introduction of a Bill like this. Members of public might very well be caused to fear for their safety by an otherwise comparatively innocuous civil disobedience action if they are constantly told, including by their federal government, that they have something to fear.
- e. It is also worth placing this reality in its broader context: not once in the history of animal rights activism anywhere in the world has there been a single incidence of activists physically harming anyone. The harm has certainly flowed the other way – activists, both

¹² See eg the comments of then Federal Minister for Agriculture David Littleproud quoted in Glen Moret and Angus Verley, ‘Ag Minister labels national farm map an “attack list” for animal activists, but not illegal’, *ABC News*, 22 January 2019, accessible at <https://www.abc.net.au/news/2019-01-22/aussie-farms-map-sparks-outrage-from-farmers-and-ag-minister/10736006>, accessed 5 July 2019.

¹³ See eg the comments of National Farmers Federation Fiona Simson quoted in Natalie Peters and Erin Molan, ‘Farmers “relieved” government to impose tougher penalties on vegan activists’, *2GB*, 4 July 2019, accessible at <https://www.2gb.com/farmers-relieved-government-to-impose-tougher-penalties-on-vegan-activists/>, accessed 5 July 2019.

¹⁴ Porter, above n 9.

¹⁵ See Moret and Verley, above n 12.

¹⁶ See Richard Ferguson, ‘Vegan crackdown is just popularity stunt: ALP’, *The Australian*, 23 July 2019, accessible at <https://www.theaustralian.com.au/nation/politics/politicsnow-parliament-turns-to-foreign-fights-bill/news-story/5facbe2aa6ff71efec602c1e38a67dd3>.

adults and children, have been dragged, assaulted and beaten, pepper sprayed, and even in several instances been deliberately killed by animal exploiters who have fatally shot, and dragged, crushed and run over activists with vehicles. All such individuals were harmed or killed during peaceful protesting activities and while trying to save animals. Not one person has ever faced prosecution for murder, manslaughter, nor anything remotely close. Nor indeed has any scheme to introduce aggravated offences to overlay an existing legal landscape that should already protect and seek justice for these activists ever been proposed by any government.

- f. The conduct that activists do engage in on agricultural properties focuses primarily if not exclusively on exposing and documenting the living conditions and treatment of animals found there. Farmers have a basic right to be safe in their homes. They do not have a right to hide behind the mythology of the intimidating animal rights activist as a justification for concealing the mistreatment and suffering of animals in their care from the public.

D. Comments on the offences proposed in the Bill

1. Jurisdiction and scope

The Federal Minister for Agriculture summed up this issue rather tellingly when she noted in relation to this Bill, “We have done what we can at a federal level to capture this behaviour, bearing in mind that trespass laws are a state issue.”¹⁷ Indeed they are. This Bill is in short an attempt to legislatively retrofit a campaigning promise made during a federal election. These areas of criminal law are the remit of state governments and should so remain. Casting about in areas of federal jurisdiction for a wily way to drag conduct appropriately and adequately addressed at the state level into the realm of federal crime is shameful.

We note the Bill’s drafters have taken pains to, as expressed by Mr Porter in his second reading speech, extend the purported protections of the Bill not just to those raising and killing animals “but also other agricultural premises such as...tree, fruit, vegetable and crop growers”.¹⁸ Come now. Even the Minister for Agriculture doesn’t pretend to believe that plant farmers are in need of protectionist government overreach, or oddly that they are even farmers – see her recent head-scratcher of a tweet, “Chicken-free chicken is not chicken, it’s reconstituted peas. We need to protect our farmers.”¹⁹ We are unaware of any pea, peach, or pecan activists having trespassed onto properties growing those crops to document the suffering occurring there. We believe it’s safe to say the government would also be pressed to name such an instance. The inclusion of these types of agricultural land appears to be motivated by attempting to maintain a veneer of even-handedness.

2. Inciting another to trespass

- a. Landowners and business operators already enjoy a broad range of legal protections from illegal conduct taking place on their property – criminal offences already exist in relation to acts of trespass, theft, vandalism, property damage and destruction, harassment and intimidation, biosecurity breaches, and unlawful surveillance. As regards incitement, so too may a prosecutor look to established offences contemplating incitement, aiding,

¹⁷ See Mike Foley, ‘Will “new” anti-trespass laws help?’, *The Canberra Times*, 10 July 2019, accessible at <https://www.canberratimes.com.au/story/6267861/will-new-anti-farm-trespass-laws-help/>, accessed 12 July 2019.

¹⁸ Porter, above n 9.

¹⁹ Senator Bridget McKenzie, 20 June 2019 tweet accessible at <https://twitter.com/senbmckenzie/status/1141963953771180033>.

abetting, counselling, or procuring, conspiracy, and the like in scenarios where individuals or entities promote or organise potentially criminal activity. Indeed at the federal level the *Criminal Code Act 1995* (Cth), supported from an enforcement and evidentiary perspective by the *Telecommunications Act 1997* (Cth), already covers the field specifically as regards making use of a carriage service to incite criminal activity.

The proponents of this Bill acknowledge that such offences could already be called into service but have been explicit in stating that their intention is for the proposed offences to function as “greater deterrents”²⁰ than existing laws apparently offer, and that the Bill “sends a strong message that [the anticipated] actions...are simply not acceptable”.²¹ Creating additional offences explicitly intended to create an extra layer of comfort only for a select group of commercial enterprises is political kowtowing that would result in an inequitable and discriminatory legal structure.

- b. As the Bill contemplates, it is irrelevant to the offence that the subject information is already publically available. It is foreseeable that individuals who feel so deeply about the suffering occurring on properties raising and killing farmed animals that they are willing to risk their personal safety and liberty to stage a sit-in or gather audio-visual evidence will not be deterred from their activities simply because of the absence of a centralised information source such as the Aussie Farms map, the explicitly stated target of this Bill.

3. *Inciting another to damage, destroy, or steal property*

- a. As explained by Mr Porter in his second reading speech, if an individual commits “[t]his second offence...[, f]or example if an activist posts on social media intending that other people pull down fences on a farm, or steal livestock from a farm, that activist would be subject to the aggravated offence and its higher penalty.”²² It is here (and further in the example provided regarding attempt offences in the EM)²³ that we find highlighted in one sentence the government attitude to living, feeling animals that causes activists and the public at large such concern. In one breath the Attorney-General bundles wood and sentient beings together when categorising financial loss. It is one thing to lean on the reprehensible state of the law that continues to classify animals as nothing more than products. It is quite another to create and promote a new criminal offence that makes no secret of punishing conduct that causes loss of a live animal the same way and at the same level as causing loss of some posts and wire.
- b. On the flipside, it is obvious from the government’s stance that these new offences if introduced will not be brought to bear against farmers who kill animals illegally, regardless of the fact the elements of the offence may in such a scenario be made out. The offence would apply when a person uses a carriage service to transmit material to incite unlawful damage or destruction of property. A farmer who texts images of calves to be bludgeoned to death with a hammer, as PETA Asia confirmed continues to happen in the Australian dairy industry,²⁴ to his employee with instructions to so kill them tomorrow afternoon would breach this provision if, say, the calves had been born that morning or the property is just using hammers out of laziness, as the applicable standard excuses such a method of killing only if the calves are less than 24 hours old “and only when no other

²⁰ Porter, above n 9.

²¹ Ibid.

²² Ibid.

²³ “...a person who has sent a message on a social media platform to a friend requesting their assistance with stealing chickens from a nearby chicken farm...[has demonstrated] an intention to use a carriage [service] to transmit material to incite another to trespass on agricultural land and steal property...”

²⁴ See exposé documented at <https://www.peta.org.au/action/exposed-babies-bludgeoned-and-mothers-shot-repeatedly-for-australian-dairy/>.

humane killing methods are reasonably available.”²⁵ A farmer who sends a note via Messenger to a worker instructing him to slit the throat of a fully-conscious adult sheep and then try and break her neck by slowly twisting it back while continuing to saw at her throat, a method caught on film in Australia last year by PETA Asia and which resulted in the sheep exhibiting clear signs of extreme pain and distress for nearly a full minute,²⁶ would commit the proposed offence.²⁷ Does the federal government intend to help out already under-resourced state RSPCAs and state agriculture departments by shouldering some of the burden of investigating and prosecuting such crimes at the national level? Our breath shall not be bated here.

E. Concluding remarks

For the above reasons PETA’s stance is that this Bill should be rejected as a whole, in favour of good faith measures that actually work to alleviate rather than conceal animal abuse and suffering.

If animal enterprises truly wish to deter those who care about animals from documenting the living and dying conditions and experiences on agricultural land, they must adopt the measures regularly proposed by various voices in the animal protection field: instead of seeking to further shroud their operations in secrecy, commit to transparency: place CCTV in all commercial animal enterprises including farming operations and slaughterhouses. Address the nation’s over-reliance on private charities that are empowered to investigate and enforce cruelty laws, as such entities are perpetually under-funded and -resourced and subject to a barrage of industry and political pressures. Instead place such powers in the hands of an independent and taxpayer-funded regulatory body. Bolster the laws that such a body may look to to address systemic cruelty.

Instead of implementing such steps that would truly address entrenched animal suffering, this Bill seeks to further criminalise the actions of those that work to expose it. The sole real boon this Bill provides for animals then is laying bare for consumers the depth and breadth of what animal-exploiting industries are desperate to hide from them, thus inevitably driving even more consumers to reject products from operations increasingly hidden from public view.

It is inarguable that the Australian public (more than 10% of whom don’t eat animals)²⁸ persistently and increasingly calls for transparency in production processes related to their food, clothing, and personal care choices. Indeed, the recent report commissioned by the Department of Agriculture itself confirmed that more than 90% of Australians “[view] farm animal welfare with concern, and...want reform to address this”,²⁹ and predicted “outrage...if the community sees the government as not responding to concerns and

²⁵ See Animal Health Australia, *Australian Animal Welfare Standards and Guidelines - Cattle*, 2014, S 11.5, accessible at <http://www.animalwelfarestandards.net.au/files/2016/02/Cattle-Standards-and-Guidelines-Endorsed-Jan-2016-250116.pdf>.

²⁶ See exposé documented at <https://investigations.peta.org/lambs-wool-australia-mulesing/>.

²⁷ See Animal Health Australia, *Australian Animal Welfare Standards and Guidelines - Sheep*, 2014, SS 10.1, 10.2, and 10.6, accessible at <http://www.animalwelfarestandards.net.au/files/2011/01/Sheep-Standards-and-Guidelines-for-Endorsed-Jan-2016-061017.pdf>.

²⁸ See eg ‘More than 10% of Australians are now vegetarian’, *SBS*, 17 August 2016, accessible at <https://www.sbs.com.au/topics/life/health/article/2016/08/17/more-10-australians-are-now-vegetarian>; and ‘More than 2 million Australians are now meat-free’, *delicious.*, 18 February 2018, accessible at <https://www.delicious.com.au/food-files/news-articles/article/plant-power-del-sun-182/suVukilr>

²⁹ Futureye, ‘Commodity or Sentient Being? Australia’s shifting mindset on farm animal welfare’, cited in McGreevy et al, ‘Not just activists, 9 out of 10 people are concerned about animal welfare in Australian farming’, *The Conversation*, 15 May 2019, accessible at <https://theconversation.com/not-just-activists-9-out-of-10-people-are-concerned-about-animal-welfare-in-australian-farming-117077>

expectations”.³⁰ Instead of so responding, the government has put forward a Bill that will serve only to foster suspicion, distrust, and dissatisfaction and communicate unambiguously to the public that accountability and transparency have been roundly rejected by the federal government. PETA will continue to make a wide range of resources aimed at making the transition to a vegan lifestyle easy and enjoyable available to consumers who reach such conclusions.

³⁰ Ibid.