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Department of Climate Change, Energy, the Environment and Water

Via <https://consult.dcceew.gov.au/australian-crocodile-code-of-practice-review>

Review of the Code of Practice on the Humane Treatment of Wild and Farmed Australian Crocodiles

FOUR PAWS Australia commends the decision to review the **2009 Code of Practice on the Humane Treatment of Wild and Farmed Australian Crocodiles**.

This review presents the opportunity for the Code to create meaningful animal welfare improvements that are in line with or exceed community expectations, and that follow the latest scientific literature on crocodile behaviours and welfare.

This submission will focus our commentary on the management of crocodiles in farming systems, and how the Code can be revised and amended to ensure it meets improved animal welfare standards, acknowledge the sentience of crocodiles, and the ways in which the farming of crocodiles impacts their fundamental physiological and behavioural needs.

FOUR PAWS Australia encourage the review to consider findings which highlight that it is not possible to farm saltwater crocodiles in a manner that is consistent with high animal welfare standards and as such, we recommend a complete phasing out of the industry. FOUR PAWS Australia is opposed to the farming of wild crocodiles altogether, however for the duration of time that this industry does operate, we will advocate for higher animal welfare standards.

What changes to the current Code of Practice would you recommend and why?

The current Code of Practice fails to refer to the General Welfare Aims of the Five Domains Model (welfare assessment tool), nor does the current Code recognise that crocodiles are sentient animals that have the capacity to feel positive and negative emotions, including the capacity to suffer.

As it currently stands, minimum housing standards permit crocodiles to be held in confinement systems that do not meet the most basic Welfare Aims outlined in the Five Domains Model. The Code of Practice must be revised in consideration of these General Welfare Aims, in addition to recognising the sentience of animals and their innate need to engage in natural behaviours.



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By doing so, the Code will acknowledge that minimum animal welfare standards for farmed animals must ensure that pain and suffering is minimised as much as possible and fosters improved welfare that recognises an animal's ability to experience positive emotions.

The Code fails to recognise the need for crocodiles' to freely express their natural behaviours and does not outline standards for enrichment within their captive environment.

Individual pens used within crocodile farming systems have been designed solely for profit as the pens prevent a crocodile's skin from being blemished ahead of slaughter, thus significantly compromising the wellbeing of crocodiles for non-essential luxury fashion products.

The use of such confinement practices is at odds with Australian community expectations of modern animal welfare standards and should not be permitted to continue. We recommend that by changing the minimum standards of housing to reflect the Five Domains Model General Welfare Aims and recognise the sentience of crocodiles, negative welfare outcomes can be significantly reduced for crocodiles.

What should be included in the revised Code of Practice that does not appear in the current Code of Practice and why?

At the bare minimum, the Code must mandate housing that provide more space per animal as appropriate for crocodiles. The current standards are too restrictive to be considered appropriate for this species. It is noted that other farmed animal industries mandate minimum space requirements such as the egg and chicken meat industries as a basic standard.

Further, species-appropriate keeping conditions must be introduced to provide enrichment opportunities for crocodiles to meet their physical, behavioural and social needs and to freely express their natural behaviours.

Given that crocodiles are kept within farming systems for years, with no enrichment opportunities or freedom to express their natural behaviours, this does not reflect community expectations nor meet the General Animal Welfare Aims outlined in the Five Domains Model.

The revised Code of Practice should recognise the sentience of crocodiles and should meet the General Welfare Aims to be consistent with modern animal welfare standards and practices.

What will be required to support implementation of the revised Code of Practice and why?

To ensure compliance with the revised Code of Practice, an independent body should be established to monitor compliance to improved standards, CCTV should be installed in all housing and slaughter facility locations, and footage should be independently reviewed. This will ensure a greater level of transparency within the industry and instil confidence that the updated standards are being adhered to.



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What scientific literature needs to be considered by the review?

The review should consider all relevant scientific literature related to the evidence of reptile sentience, including literature on crocodile suffering, and specific literature related to crocodile behaviour and their physical, social and emotional needs.

The review should use The Five Domains Model as an assessment tool for guiding systematic and thorough assessments of animal welfare states, and the General Welfare Aims should be used to guide revisions to the Code.

Is there anything additional you would like to add?

FOUR PAWS Australia is opposed to the farming of wild crocodiles and supports the submissions made by the RSPCA, Collective Fashion Justice, and World Animal Protection.

We encourage the review to consider findings which highlight that it is not possible to farm crocodiles in a manner that is consistent with high animal welfare standards and as such, recommend phasing out the industry.

An international YouGov poll commissioned by FOUR PAWS in 2021 found that almost three quarters (74%) of survey respondents are concerned about the welfare of animals in the exotic leather industry. Leading fashion brands are responding to this shift and banning the use of exotic leather in their products.

Should the review ignore the latest scientific evidence on the welfare of crocodiles or fail to revise the code in line with the General Welfare Aims outlined in the Five Domains Model, this would not be aligned with community expectations.

About FOUR PAWS:

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them.

Founded in 1988 in Vienna, the organisation advocates for a world where humans treat animals with respect, empathy and understanding. The sustainable campaigns and projects of FOUR PAWS focus on companion animals including stray dogs and cats, animals in fashion, farm animals, and wild animals – such as bears, big cats, and orangutans – kept in inappropriate conditions as well as in disaster and conflict zones.

With offices in Australia, Austria, Belgium, Bulgaria, France, Germany, Kosovo, the Netherlands, Switzerland, South Africa, Thailand, Ukraine, the UK, the USA, and Vietnam as well as sanctuaries for rescued animals in eleven countries, FOUR PAWS provides rapid help and long-term solutions. www.four-paws.org.au