



Renewing the Australian Animal Welfare Strategy: discussion paper.

Submission from the
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The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry, research and teaching. Veterinary students are also members of the Association.

Renewing the Australian Animal Welfare Strategy: discussion paper

General Comments

The AVA has been calling for national leadership in animal welfare since the cessation of the former Australian Animal Welfare Strategy (AAWS) over a decade ago. We sincerely welcome the current government's work to reinstate a renewed AAWS, and urge the government to ensure this strategy is appropriately resourced and established in such a way as to be sustainable in the long term, irrespective of changes in government.

Since the former AAWS was cancelled, there has been a stalling in progress in animal welfare policy reform, along with greater polarisation and loss of confidence in the community. The renewal of the AAWS represents a pivotal opportunity to address this and establish a modern animal welfare system that improves the lives of all animals within Australia.

Question 1. Does the AAWS vision statement reflect everything you feel an Australian Animal Welfare Strategy should aim to achieve?

The proposed vision statement is more descriptive than aspirational. It outlines what the AAWS will do in an operational sense, but omits any reference to improvement and protection of animal welfare, which we consider should be the Strategy's key goal.

The previous AAWS vision was better – it spoke to the vision for incremental and sustainable improvements in animal welfare through development and adoption of science-based animal welfare standards and practices.

Question 1a: Is there anything else it should include?

Our members have provided the following aspirational goals which they feel should be captured in a renewed Strategy vision:

- all animals in Australia are recognised for their intrinsic value, sentience, and contribution to the Australian community;
- Australians recognise that all animals are entitled to have a “life worth living”, and actively improve the lives of animals through their choices and actions;
- all Australian governments legislate and enforce appropriate standards for the care, husbandry and use of animals;
- all strategies, policies and legislation pertaining to animals are underpinned by rigorous science and motivated by high ethical standards.



Question 2: Do the proposed Work Streams cover the right priority areas for the strategy?

The work streams are supported and cover the important priority areas; we have mentioned under each subheading below some additional points that we feel are necessary to ensure the work streams are successful.

Question 2a: Are there other priority areas that you think are important and should be added to the strategy?

Leadership and coordination – this stream establishes governance arrangements to oversee strategy implementation and coordination of activities.

- It is important that leadership of the AAWS includes a balanced breadth of representation across the animal care and use sectors. In addition to industry, animal welfare and community representation, it should include expertise in veterinary science, animal welfare science, ethics and law.

Research and development – this stream implements a coordinated approach to animal welfare research and extension activities.

- It is important that there is transparency around the sources of funding of research that is used to underpin Standards & Guidelines, or to inform other AAWS activities;
- It is important that literature reviews performed to inform Standards or other animal welfare decisions are done using a systematic review method – this requires the reviewer to look at all available evidence and be transparent about their inclusion and exclusion criteria from the outset. It helps to prevent cherry-picking of evidence to suit particular arguments.
- The *quality* of evidence used is also critical – where the science is limited or absent, it is important that decisions are based on the precautionary principle in favour of the animals' best interests. A previous example where this process was flawed was the proposed 30 hour time-off-feed for bobby calves in the Land Transport Standards, based on one industry-funded study where there was debateable interpretation of results.

Standards and implementation – this stream implements an overarching framework for standards development that identifies national priorities and streamlines development and adoption by jurisdictions.

- It is important that this stream prioritises the development of standards which give rise to tangible and sustainable improvements in animal welfare outcomes, and don't merely reflect the status quo of current practice. For example, many of the existing standards do not reflect current scientific knowledge nor community expectations with respect to use of analgesia for painful livestock husbandry procedures, and this was the case even when they were drafted and endorsed. Future standards work should seek to make demonstrable improvements in the lives of animals.
- It is also critical that this stream is supported to improve implementation of these standards by the jurisdictions, to ensure national consistency of regulations, and adherence to implementation timelines. Only in this way will a level playing field be achieved for animals and industries.
- Another focus for this stream is ensuring that the Regulatory Impact Statement (RIS) process for standards is done in a manner which appropriately accounts for the animal welfare benefits of proposed improvements or innovations. In the past, RIS cost/benefit



analyses were largely done by economists, with the result that economic costs were given greater weight than potential animal welfare benefits, which were viewed as less tangible or measurable. It is essential that animal welfare scientists are part of this process to ensure the assessment is even-handed.

- Further, harmonisation of standards to ensure national consistency may extend beyond animal welfare standards and legislation, to include domestic animal management Acts and any others that impact the welfare of animals. An issue noted during the former AAWS in the companion animal sector: there is inconsistency between jurisdictions as to which Ministerial portfolio includes companion animal management (this varies across departments of agriculture, local government, and environment). A long-identified deficiency is the lack of a Ministerial Council where agreement can be reached on harmonisation of relevant companion animal management standards.

Education and communication – this stream promotes best-practice to industry and showcases outcomes to domestic audiences and international partners.

- It is important that animal welfare standards and responsibilities are understood by stakeholders and implemented consistently and appropriately. Education and extension resources are essential to achieving this outcome, thus it is essential that this aspect of the strategy is well funded.
- The previous AAWS produced a number of extremely good extension resources (including videos, web sites, brochures etc) on low-stress handling of livestock, responsible companion animal ownership, and in particular, a range of exceptional resources for the Aquatic sector.

Reporting and compliance – this stream establishes systems to track outcomes and monitor compliance.

- Funding for this stream is also critical, because lack of enforcement has been an ongoing issue with animal welfare legislation and standards within Australia. Funding for government departments and delegated agencies that undertake enforcement activities should be increased substantially in all jurisdictions.
- Welfare monitoring programs which assess compliance against the standards should be a focus of this stream. A good example of this is the *QLD Animal Care and Protection Act 2001*, which includes provisions to make animal welfare monitoring programs for each compulsory code (standards) – see Chapter 5 of the Act. This AAWS work stream should be supported to investigate establishment (and resourcing) of such schemes in all jurisdictions.
- Reporting should be in a transparent manner to provide the community with confidence in the animal welfare legislative framework.

International engagement – this stream contributes to our sustainable trade credentials by showcasing and maturing Australia's national approach to animal welfare.

- A focus of this stream should be ensuring that Australia's animal welfare standards meet those of world's best practice; and ensuring that products from countries with poorer welfare standards are not imported in competition with our own industries.



Question 3. Are there any shared factors affecting animal welfare that cut across all, or multiple, animal groups? For example: Climate change, innovation, workforce retention.

Question 3a: How can the Australian Animal Welfare Strategy address these in a practical way?

Climate change, innovation, and workforce retention are all good examples of factors that have impact in a cross-sectoral manner.

Climate change is a risk to all humans and animals, domestic and wild. The AAWS can assist with communicating the impacts and relevance to the animal care and use sector, raising public awareness, and proposing mitigation strategies.

Workforce retention is currently a critical risk in the veterinary profession, particularly in rural and regional areas. Lack of veterinarians poses significant risks to not only animal welfare, but also biosecurity, as veterinarians provide essential active and passive disease surveillance services. Without these, our nation's favourable animal disease status, public health, food security and export markets are at significant risk. A focus of the AAWS could be researching factors that contribute to workplace shortages in animal use industries and professions, and ways to mitigate these, including engaging experts to guide recruitment and retention in these sectors.

Another problem shared across animal groups and jurisdictions is the issue of inappropriately low penalties for animal welfare offences. We need greater deterrents in place and national consistency of these, in line with society's ever-growing expectations that animals should be treated appropriately.

Question 4: What do you think are the biggest challenges facing Australia's animal welfare system?

All of the listed items in the survey present challenges. We have ranked in order of priority and provided further comment on each:

- *There is a complex relationship between animal welfare regulation, productivity and community expectations.*
 - There is an inherent tension and competing priorities as a result of animal welfare regulation being within departments of agriculture whose key priority is the productivity of animal industries– see our comment below in relation to independent governance and the recommendations of the Productivity Commission in 2017.
- *The national standards development system is complex and not currently meeting all stakeholder needs.*
 - See comments in question 2a regarding Standards and Implementation work stream issues.
- *Animal welfare is primarily a state and territory responsibility providing challenges with a harmonised approach to decision-making.*
 - See comments in question 2a regarding lack of national consistency of standards implementation
- *Community values and expectations about animal welfare issues are constantly changing, while improvements in animal welfare science can take time to develop and implement.*



- As mentioned in response to question 2a, standards should be science-based wherever possible, provided the science is assessed in a robust manner and quality evidence is used; where science is lacking the precautionary principle should be employed in favour of animals' best interests.
- *Developing a fit-for-purpose national strategy that suits all audiences, taking into account that different groups of stakeholders may have different expectations and interests.*
 - While there is a broad spectrum of stakeholders with varying views, the previous AAWS demonstrated that there is a great deal of willingness of groups to work together to mutually accepted outcomes and progressive improvements.

Question 5: Are there additional challenges in the animal welfare system that have not been listed above, which the renewed strategy should consider?

Lack of independent governance:

The AVA has long championed the need for national animal welfare oversight by an impartial body which ensures independent governance and decision-making. A big challenge at the moment is managing the competing interests and priorities of stakeholder groups leading to slow and stalled processes (for example the initial phase of the Poultry Standards and Guidelines development, before an independent process was employed to finalise these).

The AVA participated in the Productivity Commission's Inquiry into Regulation of Australian Agriculture in 2017. In our submission and witness statements we called for the establishment of an independent body or office at the federal level to provide federal leadership of the states and territories in animal welfare reform. This impartial office should include or have oversight by an independent panel with expertise in veterinary science, animal welfare, ethics, law and agriculture. One example we raised at the time was the New Zealand Animal Welfare Advisory Committee (NZAWAC).

In their final report, the Productivity Commission recommended that a mechanism be established to ensure separation between agriculture policy matters and farm animal welfare monitoring and enforcement functions (recommendation 5.2). Independence from the state Departments of Agriculture is desirable to remove real or perceived conflicts of interest and ensure continuing community confidence.

The AVA has previously stated our support of the Commission's recommendation for the establishment of an 'Australian Commission for Animal Welfare' to coordinate national animal welfare policy and standards development, and to publicly assess the effectiveness of state and territory implementation and enforcement.

Lack of resourcing generally:

An ongoing challenge has been insufficient resourcing of animal welfare regulatory bodies (government departments and delegated agencies) in states and territories. This restricts their ability to monitor and enforce animal welfare legislation and standards. Currently most enforcement is dependent on complaints, as agencies do not have capacity to proactively monitor or audit against standards. Such complaints represent only the tip of the iceberg in terms of what welfare compromise may be occurring.



Sufficient funding for animal welfare monitoring programs (see question 2 above) should be available to allow interventions, education, and where necessary, corrective actions to occur – in this way, poor outcomes can be prevented and welfare overall can be improved, which is preferable to the limited reactive approach of a complaints-based system. It also should lead to better transparency and community confidence.

It is also concerning that the current funding for the renewed AAWS covers only the planning phase but not the implementation of the strategy. The AVA recommends that provisions are made for ongoing funding of the AAWS so that it remains sustainable, and its future is assured.

Question 6: What do you think are the biggest opportunities for Australia's animal welfare system?

All of the listed items in the survey present opportunities. We have ranked in order of priority and provided further comment on each:

- *There is a changing social licence, reflecting the intrinsic value of animals and their importance to people.*
 - See comment above in question 1a (AAWS vision) about the importance of recognising intrinsic value and sentience in animals.
- *Animal welfare has become part of national conversations including biosecurity, animal health and productivity.*
 - There is increased community concern about the provenance of their food and an awareness of the need to give animals a “life worth living”; this is coupled with a realisation within the community that their choices and actions will influence this.
- *There is a strong research community, focused on developing and considering contemporary animal welfare science and evidence and coordinating research and data collection across jurisdictions.*
 - This is a flow-on effect of increasing community awareness and interest; it is essential that the research is conducted in an independent and transparent manner and is appropriately funded.
- *Agriculture Ministers are focused on animal welfare and work is underway to improve national standards setting.*
 - The current initiatives (AAWS, Standards and Guidelines review) are strongly supported by the AVA; see further comments above in question 2a regarding the Standards and Implementation work stream.
- *Overseas trading partners are increasingly interested in Australia's animal welfare credentials.*
 - Australia should aspire to have animal welfare standards on par with world's best practice. In line with this, the government should ensure that Australia is not importing products from countries with lower animal welfare standards, which compete with our domestic industries.



- *Animal industry and animal-related industries are increasingly building animal welfare into industry-level sustainability plans and work practices.*
 - Industry animal welfare quality assurance processes are an important way for them to demonstrate compliance with standards in a transparent way and maintain community confidence.

Question 7: Are there additional opportunities for improvements in the animal welfare system that have not been listed above, which the renewed strategy should consider?

National leadership in standards implementation and enforcement.

As outlined in answer to question 5, the establishment of a national Animal Welfare Commission, as recommended by the Productivity Commission in 2017, would significantly improve Australia's animal welfare system. Such a body would have numerous benefits, including clear independence from political and stakeholder interests, relevant expertise, and the ability to track and report on state progress regarding standards implementation. This federal leadership of states and territories and coordination of national animal welfare policy reform is urgently needed, in addition to (and integrated with) the renewed AAWS Strategy.

Sentience

With the renewal of AAWS comes a great opportunity to officially recognise the sentience and intrinsic value of animals, in a nationally-consistent manner. The ACT has already enshrined this in legislation, and other states are considering it currently. This recognition should form the basis of the renewed AAWS strategy and underpin its vision and purpose.

Harmonisation of legislation

Further to the above, there is an opportunity to harmonise all State and Territory legislation that impacts the welfare of animals: this includes the animal welfare Acts of course, but also other pieces of legislation which directly affect the way animals are kept and managed, for example, companion animal management legislation, microchip legislation, conservation, environmental protection and climate change – the list is long.

Again, in the companion animal sector, a long identified deficiency is the lack of a Ministerial Council where the relevant ministers can meet and agree on harmonisation of legislation. Domestic animals are under Agriculture in some jurisdictions, Urban Services in others, so there is real opportunity to address this through a national approach.

Question 8: Is there anything else you would like to be considered in the development of the strategy, within the scope described in this discussion paper.

The previous AAWS had, from our member recollections, around 160 representatives (plus departmental staff and paid consultants). Many represented their organisations as part of their paid work. Others, including many or most AVA representatives, were volunteers whose contribution cost them time and often foregone income. Member organisations like the AVA are unlikely to be able to reimburse all the non-staff representatives to AAWS. There may well be many others, particularly community groups, who will send willing volunteers. Consideration should be given to a stipend of some sort for representatives not paid by the organisations they represent.



Additional comments - Timeline

The proposed timeline for the renewal of the AAWS, stretching to 2027, seems unnecessarily protracted. It is strongly recommended that the different chapters should be developed concurrently, particularly given the likelihood of overlapping and common issues. We urge the Australian Government to allocate additional funding to expedite the process.

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