



Tasmanian Animal Welfare Amendment Bill 2022

Submission of the Tasmanian Division of the
Australian Veterinary Association Ltd
20 July 2022

About the Australian Veterinary Association (AVA)

The Australian Veterinary Association appreciates the ability to contribute to the Tasmanian Animal Welfare Amendment Bill 2022 intended to support and further strengthen the provisions under the Animal Welfare Act 1993 (the Act) for the enforcement and prosecution of animal welfare offences in Tasmania.

Registered veterinarians by virtue of their training, skill and knowledge promote animal welfare at all levels of activity and interactions with humans or animals.

The Australian Veterinary Association is the national organisation representing veterinarians in Australia. The AVA consists of over 8500 members who come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

The Tasmanian Division of the Australian Veterinary Association represents veterinarians in Tasmania.

Background

Veterinarians have skills and professional responsibility to ensure that animals owned by and/or controlled by people receive adequate care. This responsibility should be exercised in all the human – animal relationships, from animals in the wild making brief contact with humans to farmed, flock and herd animals, companion animals, and animals used in sport, entertainment, education, and research.

The AVA recognises the responsibilities of animal owners and Australian society to provide modern standards of animal welfare legislation with collaboration across the animal health sector including registered veterinary professionals.

Animals and people have established relationships for mutual benefit for thousands of years. The importance of modern standards of animal welfare legislation has implications for the welfare of individual animals which have intrinsic value and should be treated humanely by the people who benefit from them.

There are also broad impacts on society as the development of welfare standards and guidelines underpins access to overseas and domestic markets. Australia risks losing consumer confidence and significant national and international markets if legislation does not evolve.



Contents

About the Australian Veterinary Association (AVA)	2
Background.....	2
Contents	3
Safeguarding Animal Welfare.....	4
Animal Sentience	4
Inclusion of Sentience	4
Inclusion of the concept of “Duty of Care”	4
Discussion on key amendments of the <i>Animal Welfare Act 1993</i> (the Act)	6
Section 3 amended (interpretation)	6
Section 3 A (Care or charge of animals).....	6
Section 4 amended (non-application of Act).....	7
Section 27 amended (Animal research)	8
Section 8 amended	9
Cruelty to animals	9
Ban on pronged collars.....	9
Section 9 amended (Aggravated cruelty).....	10
Section 16 amended (expanded power to enter, search and inspect premises).....	11
Section 17 amended (expanded power to take possession of animals).....	11
Section 17A inserted - Court may order seizure or disposal of animals	12
Section 24 amended (power to kill animals) – Carcase disposal reduced from 7 days to 48 hours.	12
Section 26 amended (expanded power to require information from interstate residents).....	13
Section 45 amended (early costs and expenses recovery, including by the Crown)	13
Section 41B inserted	14
Conclusion	15
Contact:.....	15
References and relevant AVA policies:	16



Safeguarding Animal Welfare

Animal Sentience

Proposed amendment

The Department is aware that there is public interest in the inclusion of the concept of ‘sentience’ for animal welfare. This term can be defined as ‘the ability to feel, or perceive, or be conscious, or have subjective experiences as distinct from the ability to reason, and that these qualities can be attributed to many animals.

Inclusion of ‘sentience’ in New Zealand and the ACT in the title or the objects of their animal welfare acts is largely symbolic and not enforceable. Tasmania intends to include the concept in the animal welfare guidelines.¹

Recommendation

Inclusion of Sentience

Animals are sentient beings that are conscious, feel pain, and experience emotions.

Animals that are known to be both conscious and sentient include all the vertebrates, and some classes of invertebrates such as cephalopods and some crustacea. Ongoing research may lead to inclusion of additional groups within this definition.

Sentience is the capacity to experience emotions: pain, suffering, negative and positive affective states.

AVA respectfully agrees that it is important for the new legislation to acknowledge this.

Inclusion of the concept of “Duty of Care”

Further, the AVA recommends that modern animal welfare legislation should include the concept of “duty of care” which requires proactive steps to be taken by people to provide a minimum standard of care to all animals; this leads to better welfare outcomes than just preventing cruelty. We recommend that this duty of care be based on the principles of the Five Domains are enshrined in the new legislation. This is critical to clearly distinguish the new Act from dated ‘prevention of cruelty’ focussed legislation.

The Five Domains looks at animals’ needs in five “domains” of potential welfare compromise, and the degree to which those needs are - or are not, met.

The first four physical domains are nutrition, environment, health and behaviour. The fifth “mental” domain describes how those negatives (and positives) in the physical domains combine to affect an animal’s experience. Contemporary animal welfare science aims for a reduction or elimination of the negative experiences, and a predominance of positive states in each domain, so that an animal

¹ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



experiences a “life worth living”. The Queensland Animal Care and Protection Act 2001 (ACPA) includes duty of care provisions, and these have been successfully applied in that state – the AVA suggests that the ACPA duty of care provisions (section 17) are perused and used as a basis for the amendments. As below:

Excerpt from Queensland Animal Care and Protection Act 2001

Chapter 3 General Animal Offences

Part 1 Duty of care Pg. 19

17 Breach of duty of care prohibited:

- 1. A person in charge of an animal owes a duty of care to it.*
- 2. The person must not breach the duty of care.*
- 3. For subsection (2), a person breaches the duty only if the person does not take reasonable steps to—*
 - (a) provide the animal’s needs for the following in a way that is appropriate—*
 - i. food and water;*
 - ii. accommodation or living conditions for the animal;*
 - iii. to display normal patterns of behaviour;*
 - iv. the treatment of disease or injury; or*
 - (b) ensure any handling of the animal by the person, or caused by the person, is appropriate.*
- 4. In deciding what is appropriate, regard must be had to—*
 - i. the species, environment and circumstances of the animal; and*
 - ii. the steps a reasonable person in the circumstances of the person would reasonably be expected to have taken.*

Examples of things that may be a circumstance for subsection

(4)(b)—

- a bushfire or another natural disaster*
- a flood or another climatic condition”*



Discussion on key amendments of the *Animal Welfare Act 1993* (the Act) Section 3 amended (interpretation)

Proposed amendment

Expanded meaning of 'disposal' and consequential amendments

The expanded definition of 'dispose' allows for all opportunities to manage animals.

Amend the Act to clarify the meaning of 'disposal', to include euthanasia, sale or rehoming.

It is useful to include the options available for disposal in the legislation, from euthanasia to sale or transfer of ownership to the RSPCA or the Crown. Equivalent legislation in other jurisdictions (for example, the ACT, Victoria and Queensland) include provisions regarding disposal. Consequential expansion of disposal options under the Section 17 power to take possession of animals will allow a more efficient functioning of the legislation.²

Recommendation

The AVA is concerned that the use of the term 'disposal', which traditionally is used for considering the remains of an animal after death. There may be less confusion to use the commonly used and accepted terms of 'sale' or 'transfer of ownership' and 'euthanasia'.

Section 3 A (Care or charge of animals)

Proposed amendment

Onus of proof of animal ownership facilitated

Statements that a specified person had, or has, custody, control or possession of a specified animal is admissible as evidence.³

Amend the Act to reverse the onus of proof so that an animal is assumed to belong to the person named as the owner in any animal welfare complaint unless proven otherwise.

Currently a person in charge of an animal can simply deny ownership, making investigations and prosecutions difficult. It has been dealt with under section 3A 'Care of Charge of Animals'.⁴

Recommendation

The AVA has no comment.

² <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>

³ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/online-submissions-draft-animal-welfare-amendment-bill>

⁴ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



Section 4 amended (non-application of Act)

Proposed amendment

Animal research clarifications

Clarification that certain activities do not apply to any animal research carried out in a licensed institution if that research is carried out with the approval of the Animal Experimentation Ethics Committee etcetera. There are further proposals on animal research in sections 14 and 15.⁵

Amend the Act to clarify the provisions relating to animal research with respect to which activities require Animal Ethics Committee approval.

It is intended to add, for consistency, the non-application of section 10 (baiting and shooting) and section 11 (use of animals to train other animals) of the Act to approved animal research activities.⁶

Recommendation

The proposed amendment is not supported.

The AVA understands the purpose of the Animal Ethics Committee (AEC) operating under the requirement of the Australian code for the care and use of animals for scientific purposes, 8th Edition, 2013 (the Code), is to consider proposals to conduct scientific or educational projects that involve animals.

The AVA has concerns regarding the proposed amendment and would appreciate further information on the scope and intent of the proposed amendment. This includes confusion about the relevance of Section 10 (baiting and shooting) and Section 11 (use of animals to train other animals) to scientific or educational projects applicable to the AEC or whether the proposal is seeking to increase the requirements of the AEC to include areas outside of scientific or educational projects.

The AVA is concerned also around the implementation of the amendment such as direct veterinary oversight if it were to include Section 10 (baiting and shooting) and Section 11 (use of animals to train other animals).

AVA supports the following principles:

There must be appropriate legislation and enforcement to ensure that the welfare of animals used in research, field trials and teaching is adequately protected.

The principles in the Australian Code for the Care and Use of Animals for Scientific Purposes as amended from time to time should form the basis of the regulatory control of animal experimentation as a minimum.

⁵ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/online-submissions-draft-animal-welfare-amendment-bill>

⁶ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



There is a requirement to ensure adequate veterinary staffing to directly assess and certify competence of researchers to perform acts of veterinary science, including anaesthesia, analgesia and surgical protocols. There must be ongoing presence of facility veterinarians at a sufficient level to adequately supervise animal interventions and monitor the peri-operative welfare of the animals involved.

Veterinarians are involved in the oversight of use of animals for scientific purposes in two main roles: as serving as a member of an animal ethics committee or as an institutional or facility veterinarian. In either capacity, veterinarians must be registered with an Australian veterinary board. All institutions using animals for research must employ facility veterinarians in sufficient numbers to adequately supervise animal interventions. Facility animal welfare officers (AWOs) should also be veterinarians.

Section 27 amended (Animal research)

Proposed amendment

Exemptions expanded to include disease surveillance and monitoring, of an animal, that is conducted– (i) by a person for the purposes of disease identification or disease management; and (ii) in accordance with recognised methodologies and practices. This is in line with established animal use policy.⁷

It is also proposed that authorised disease surveillance and monitoring programs (using accepted methodologies) be added to the current exemptions from animal research licensing requirements under section 27. The current exemptions are observational studies, normal animal management operations and veterinary treatment administered for the welfare of the animal.⁸

Recommendation

The AVA is concerned with expanding exemptions to include disease surveillance and monitoring for the purposes of disease identification or disease management of an animal, to be conducted by ‘a person’ and not a registered veterinary practitioner.

The welfare of animals and the control of disease, as well as public health and biosecurity, may be compromised where non-veterinarians independently diagnose and treat animals

Under the Veterinary Surgeons Act 1987, a person shall not engage in the practice of veterinary surgery or render a veterinary service unless that person is a registered veterinary surgeon.

This is essential for maintaining animal welfare and public safety.

Only registered veterinary practitioners are trained and regulated for the purposes of diagnosing the physiological or pathological condition of the animal, including testing or imaging for diagnostic purposes in Tasmania.

⁷ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/online-submissions-draft-animal-welfare-amendment-bill>

⁸ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



Currently, there is already provision for a person to conduct normal animal management operations in addition to observational studies and veterinary treatment administered for the welfare of the animal.

There is also currently provision for a person to provide a veterinary service in an emergency, where a registered veterinary surgeon is not reasonably or readily available under the veterinary surgeons Act 1987.

Additionally, ‘recognised and accepted methodologies and practices’, ‘established animal use policy’, ‘authorised disease surveillance and monitoring programs’ and ‘accepted methodologies’ are ambiguous, and AVA accepts that methodologies and practices must be in accordance with an approved code.

There must be appropriate legislation and enforcement in all states and territories to ensure that the welfare of animals used in research, field trials and teaching is adequately protected. The principles in the Australian Code for the Care and Use of Animals for Scientific Purposes as amended from time to time should form the basis of the regulatory control of animal experimentation as a minimum.

Section 8 amended

Cruelty to animals

Proposed amendment

Amend the Act to provide for an alternative conviction under section 8 of the Act (cruelty) if a person is not found to have been intentional or reckless in causing suffering under section 9 (aggravated cruelty).

This will allow a person charged with an offence under section 9 (aggravated cruelty) to instead be convicted of the less serious offence under section 8 in cases where the court finds cruelty has occurred but is not satisfied beyond reasonable doubt that it was intentional or reckless. This will remove the current need for duplicitous charging under both section 8 and section 9 of the Act to allow for alternative verdicts.⁹

Recommendation

The AVA is not opposed to the Act providing an alternative conviction or insertion of the word ‘may’, as suggested.

The AVA also suggests that it is more useful to support a duty of care which requires an animal owner to actively provide for animal's needs such may be found in the Queensland Animal Care and Protection Act 2001.

Ban on pronged collars

Proposed amendment

⁹ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



Amend section 8 (2) of the Act to specifically ban the use of pronged collars as defined, on all species. The known use is currently on dogs.¹⁰

Recommendation

AVA policy states that prong collars (also referred to as pinch or constriction collars) must not be used under any circumstances due to their highly aversive nature. There is a prohibition on importation into Australia and they are banned in some jurisdictions such as the state of Victoria. AVA supports that their use should be illegal in all Australian jurisdictions.

Collars designed to inflict pain, discomfort, or fear to achieve behavioural change should not be used on dogs. Other examples include electronic collars, citronella and choke collars. Invisible fence containment collars should not be used unless their use can increase the safety and overall welfare of the animal.

All collars designed to reduce behaviours by using punishment or negative reinforcement, bring with them a risk of long-term negative behavioural effects, such as aggression or compulsive behaviours and poor welfare but not necessarily any long-term behavioural benefit.

Positive reinforcement training of dogs is recommended for modifying the behaviour of dogs and renders the use of such equipment unnecessary.

The psychological dangers and negative welfare implications of using punishment and negative reinforcement are well documented. Additionally, there are physical dangers to an animal when owners use this equipment. Pulling on choker chains can cause soft tissue trauma and increased intraocular pressure. There has been at least one reported case of severe brain damage with consequent euthanasia after the use of a choker chain to punish a dog.

Common behaviours for which owners use these collars include pulling, jumping up at people, lunging at dogs or people, barking and escaping.

Please find here the current [AVA Policy and Guidelines for the Use of behaviour-modifying collars on dogs](#) (Ratification Date 15 July 2022) for assistance with supporting the proposed changes.

Section 9 amended (Aggravated cruelty)

Proposed amendment

If a person is charged with but not found guilty of an offence under this section, the person may be convicted of a lesser offence under section 8 if the evidence in the proceedings on the charge under section 9 establishes that the person committed an offence under section 8.¹¹

¹⁰ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>

¹¹ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



Include a provision for consideration of “reckless behaviour” leading to animal suffering by expanding section 9 (aggravated cruelty) of the Act to include ‘reckless behaviour’ leading to animal suffering. Advice was received that this consideration is already embedded in section 9.¹²

Recommendation

The AVA considers the concept of reckless behaviour be addressed as a breach of duty of care provisions which provides better clarity for the range of potential situations as detailed above.

Section 16 amended (expanded power to enter, search and inspect premises)

Proposed amendment

Amend section 16 of the Act to provide authorised officers with the power to enter premises (other than dwellings) to provide immediate assistance to animals in urgent need.

It is important that officers have the ability to enter a property if they have reasonable grounds to believe an animal is suffering and they can provide assistance or take the animal to a veterinary surgeon. Suffering should not be prolonged or exacerbated because an officer is not able to access an animal until further evidence is presented.¹³

Also amend the Act to allow authorised officers to obtain a warrant to enter dwellings to assist animals in urgent need.

Recommendation

The AVA supports measures to improve animal welfare by reducing the delay of veterinary treatment.

Section 17 amended (expanded power to take possession of animals)

Proposed amendment

Additionally, an officer may take possession of an animal and detain it in a safe place if the officer is satisfied that –

- a) an offence under section 7 or 8 has been, is being, or is likely to be committed in respect of the animal;*
- or*
- b) the animal requires medical treatment by a veterinary surgeon.¹⁴*

Recommendation

¹² <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>

¹³ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>

¹⁴ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/online-submissions-draft-animal-welfare-amendment-bill>



The AVA supports measures to improve animal welfare by reducing the delay of veterinary treatment.

Section 17A inserted - Court may order seizure or disposal of animals

Proposed amendment

A magistrate may only make an order under subsection (1) in respect of an animal if the magistrate is satisfied that, without the order, the welfare of the animal is at risk. The full range of disposal options is available.¹⁵

Amend section 17 to provide magistrates with the power to order the seizure and immediate disposal (by way of sale, rehoming, euthanasia, etcetera) of any animal at risk of suffering abuse or neglect in accordance with the proposed officer powers above.

There is significant precedent for this in other State's animal welfare legislation where the responsible Department reasonably believes it is necessary to prevent the animal from becoming the subject of an animal welfare offence.¹⁶

Recommendation

The AVA is concerned about the use of the term 'disposal', which traditionally is used for considering the remains of an animal after death. There may be less confusion to use the commonly used and accepted terms of 'sale', 'transfer of ownership' and 'euthanasia'.

Section 24 amended (power to kill animals) – Carcase disposal reduced from 7 days to 48 hours.

Proposed amendment

Amend section 24 to reduce the time for which carcasses of animals euthanised by authorised officers must be kept from 7 days to 48 hours.

Section 24 of the Act provides for officers or vets to kill animals for humane reasons. It also requires that the carcass of an animal killed in this manner is made available to the owner if the owner so requests within 7 days of the animal being killed. The time within which the carcass must be made available to the owner was increased from 24 hours to 7 days by a 2002 amendment to permit the prosecution adequate time to undertake post-mortem laboratory examination and testing.

An unintended consequence of the amendment was that, in the absence of a request for its return, the carcass must be held for 7 days even if no tests are to be performed. This can provide difficulty in cases where appropriate storage may not be available (particularly for large animal carcasses).

¹⁵ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/online-submissions-draft-animal-welfare-amendment-bill>

¹⁶ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



Carcases from animal welfare cases usually have no commercial value and are disposed of by deep burial in a municipal land fill.¹⁷

Recommendation

The AVA supports the change provided it does not encourage additional regulatory burden of veterinarians and unmanageable timeframes.

Section 26 amended (expanded power to require information from interstate residents)

Proposed amendment

It is proposed to modify section 26 to include an express provision for being able to require information from people who are interstate (not in Tasmania). It is further proposed to explicitly state that records or documents held by the person or persons are included in the information that may be required. This will ensure animal welfare compliance investigations are not prevented or impeded by key witnesses and evidence simply leaving Tasmania.¹⁸

Recommendation

AVA has no comment.

Section 45 amended (early costs and expenses recovery, including by the Crown)

Proposed amendment

Amend the Act to provide for early (pre-trial) cost recovery from animal owners for care of seized or treated animals and to remove doubt that this applies to costs incurred by the Crown. This power is particularly important in cases including large numbers of animals and/or protracted periods of care. At present, section 22 of the Act provides for cost recovery by court order, but this follows a final determination of court proceedings which can take years.

It is intended that a court will be able to provide cost orders so that the owner can be required to pay any costs and expenses properly incurred by a person providing care or treatment to an animal under the Act. This will allow a more efficient functioning of the legislation by alleviating financial burdens for animal care.

Section 45(2) of the Act provides a general head of power for a person to recover costs of functions performed under the Act (irrespective of whether the matter related to court proceedings) however there might be some doubt that the section applies to the Crown. The reason for this is section 41 of the Acts Interpretation Act 1931 which excludes the Crown from references in legislation to “a

¹⁷ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>

¹⁸ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



person". The Act will be amended to remove all doubt that the Crown can recover costs in this fashion.¹⁹

Recommendation

The AVA agrees with the proposal.

Section 41B inserted

Proposed amendment

A person must not intimidate, threaten or abuse an inspector (research) to bring this protection in line with that of an animal welfare officer.

Recommendation

The AVA agrees with the proposal.

The AVA also suggests that where veterinary practitioners are required, these protections are extended to them also.

¹⁹ <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>



Conclusion

Thank you for providing the opportunity for the Australian Veterinary Association, as the peak body representing veterinarians, to contribute to the Tasmanian Animal Welfare Amendment Bill 2022.

The modernisation of animal welfare legislation protects the intrinsic value of animals and the relationships animals and humans have valued for thousands of years. It also protects the benefits that humans derive from the uses of animals through maintaining consumer confidence of Australian animal welfare standards.

Modernisation of animal welfare legislation is seeing the inclusion of sentience and duty of care in Australian and international animal welfare legislation, and this provides clear guidance for Australians in addition to protecting the social licence necessary for access to significant national and international markets upon which Australian society depends.

The AVA acknowledges the leadership and direction that the Tasmanian Animal Welfare legislation hopes to provide, and the collaboration across society that is required to protect animal health and welfare.

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References and relevant AVA policies:

The AVA Policy Advisory Council includes a representative (registered veterinarian) from every AVA State Division and special interest group. It develops a range of national policies and position statements after extensive consultation with members. These are approved by the AVA Board before becoming official policies or positions of the Australian Veterinary Association.

Legislation and regulation

1. <https://www.legislation.qld.gov.au/view/pdf/2016-07-01/act-2001-064>
2. <https://www.legislation.tas.gov.au/view/whole/html/inforce/current/act-1987-104>
3. <https://nre.tas.gov.au/Documents/AWA%20Amendment%20Bill%20Consultation%20Copy.pdf>
4. <https://www.ava.com.au/policy-advocacy/policies/professional-practices-for-veterinarians/licensing-of-veterinarians/>

AVA policies and statement of principles

5. <https://www.ava.com.au/policy-advocacy/policies/>
6. <https://www.ava.com.au/policy-advocacy/policies/animal-welfare-principles-and-philosophy/philosophy-on-animal-welfare-and-the-veterinarian/>
7. <https://www.ava.com.au/policy-advocacy/policies/complementary-and-alternative-treatments/diagnosis-and-treatment-of-animals-by-non-veterinarians/>
8. <https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/quarantine-and-risk-assessment/>

Safeguarding animal welfare, Animal Sentience, Duty of care, Cruelty to animals

9. <https://www.ava.com.au/policy-advocacy/policies/animal-welfare-principles-and-philosophy/animal-abuse/>
10. <https://www.ava.com.au/policy-advocacy/policies/companion-animals-dog-behaviour/use-of-behaviour-modifying-collars-on-dogs/>
11. <https://www.ava.com.au/policy-advocacy/policies/australian-animal-welfare-standards-and-guidelines/australian-animal-welfare-standards-and-guidelines/>
12. <https://www.ava.com.au/policy-advocacy/policies/companion-animals-dog-behaviour/the-use-of-punishment-and-negative-reinforcement-in-dog-training/>



13. <https://www.ava.com.au/policy-advocacy/policies/companion-animals-management-and-welfare/the-responsible-ownership-of-dogs-and-cats-and-the-human-animal-bond/>
14. <https://www.ava.com.au/policy-advocacy/policies/hunting-and-fishing/hunting/>
15. <https://www.ava.com.au/policy-advocacy/policies/miscellaneous-welfare-issues-animal-research-teaching/animal-experimentation/>
16. <https://www.ava.com.au/policy-advocacy/policies/other-services-provided-by-veterinarians/role-of-veterinarians-in-the-care-and-use-of-animals-for-scientific-purposes/>

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