



WA State Support Plan Animal Welfare in Emergencies

Submission of the
Australian Veterinary Association Ltd

August 2024

The Australian Veterinary Association

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.

AVA Statement of principles with respect to Animal Welfare

Animals are sentient beings that are conscious, feel pain, and experience emotions. Animals and people have established relationships for mutual benefit for thousands of years.

Humans have a duty of care to protect animals. Where a person does not meet his or her obligations to animals in his or her care, animals may suffer. When this happens, the law must be able to adequately intervene to enforce compliance and prevent suffering.

Animals have intrinsic value and should be treated humanely by the people who benefit from them. Owned animals should be safe from physical and psychological harm. They need access to water and species-appropriate food and shelter and should be able to fulfil their important behavioural and social needs. They must receive prompt veterinary care when required and have as painless and stress-free a death as possible.

Animals can be used to benefit humans if they are humanely treated, but the benefit to people should be balanced against the cost to the animal. They should not be used in direct combat or for purposes where suffering, injury or distress is likely to be caused.

Humans should strive to provide positive experiences to promote a life worth living for the animals in their care. We should strive for continuous and incremental improvement in the treatment and welfare of animals.

Humans have a responsibility to care for the natural environment of free-living native animals. People should take steps to preserve endangered species and protect native animals from disease where possible.



Response to questions

Suitability of Arrangements

6. Are the arrangements in the proposed State Support Plan suitable for supporting animal welfare in emergencies?

Introduction **No**

Preparedness **No**

Response **No**

Recovery **No**

7. If any arrangements are marked as unsuitable, please describe how the arrangements could be amended to become suitable.

1.0 Introduction

It is important to note that the owner or person responsible for caring for an animal (the carer) is primarily responsible for the welfare of that animal.

1.4 Roles and Responsibilities

The owner or carer of an animal is responsible for the welfare of that animal and should include planning for its welfare in preparedness for, response to and recovery from an emergency.

AVA Response:

It is recognised that wildlife is under the ownership of government, therefore government would be primarily responsible for the welfare of wildlife in emergencies (as outlined in 1.0 of the State Support Plan).

The expectation of the veterinary profession being obligated for emergency response treatment of disaster impacted animals without appointment or payment for animals either privately owned or owned by government (which includes wildlife and strays or displaced animals) puts unreasonable expectation and financial burden on the profession. The financial impacts affect the viability of veterinary businesses and on-flows to the remuneration and working conditions of veterinarians and staff.

Appropriate payment must be made to individual veterinarians and their team members for their time, and compensation made for the financial impact to veterinary businesses, when providing veterinary services in emergencies to attend to the welfare of animals owned by government or privately owned. A mechanism for how veterinary services are engaged, how the payment is calculated and received must also be included in the emergency response arrangements. For example, in NSW the Department of Primary Industries Agriculture and Animal Services Functional Area (AASFA) provides funding via task request numbers to private veterinarians to facilitate emergency animal assessment and treatments for conditions that are a direct result from the disaster event.

The aspect of Veterinary Indemnity Insurance for veterinarians involved in emergency response care of animals has been addressed by the CAWE in 2024. Correspondence from DPIRD (dated



20/12/24, ref FA1003513) confirmed “that during an animal welfare response under the coordination and command of DPIRD and following the activation of the State Support Plan for Animal Welfare in Emergencies, all veterinary professionals undertaking duties prescribed by this incident command will be covered for professional indemnity protection under DPIRD’s insurance policy. This removes the need for Volunteers to be employed by DPIRD to access cover during a formal response”. (Sonya Broughton, Executive Director Biosecurity). The AVA requests that this be included in the State Support Plan document.

2.1 Responsibility for Preparedness

2.1.1 *Maintain a contemporary database of stakeholders to assist with animal welfare in emergencies.*

AVA Response:

The AVA would like more information provided on how this database is compiled and maintained, with regard to veterinary personnel included in the database and engagement of their support. Furthermore, clarification is needed of any expectations of the AVA around communications and possible inclusion with this database.

We have advised the CAWE (email to Brett Hopley, State Animal Welfare in Emergencies Coordinator, 22/12/23) that for emergency responses coordinated by other stakeholders, the AVA will facilitate communications through our member channels to request the assistance of private veterinarians.

It is the AVA’s understanding that the [AVERT \(Australian Veterinary Emergency Response Team\)](#) program, managed by Vets Beyond Borders (VBB), is a register of veterinarians who may have the capacity to respond during emergency incidents. The AVA encourages veterinarians to register with **AVERT**.

2.3 Community Information and Education

DPIRD maintains publications to assist in community education for animal welfare in emergencies, which are available on the DPIRD website. DPIRD will collaborate with organisations in agreement under this Plan to develop a suite of tools and information to assist in preparing for animal welfare in emergencies.

During periods where there is a very high or extreme likelihood of an emergency occurring, DPIRD will liaise with the relevant controlling agencies or HMAs, and the organisations in agreement under this Plan, to share situational information and promote proactive reparation for animal welfare.

AVA Response:

The AVA highlights the critical role that public awareness plays in ensuring animal welfare during disasters. There is a pressing need for increased government funded public awareness campaigns specifically tailored towards animal disaster preparedness.

Preparedness is the first line of defence against the detrimental effects of disasters. By Governments investing in public awareness campaigns, we can equip livestock and pet owners with the knowledge and tools needed to safeguard their animals' wellbeing.



Such campaigns should focus on educating the public about the importance of creating disaster plans that include their animals, the value of microchipping and tagging for identification, evacuation arrangements, and knowledge what to do if their animal is injured or dies from the disaster. These measures can greatly assist in the event of a disaster and significantly reduce the pressures on emergency and veterinary services.

Moreover, wildlife is often the forgotten victim in disaster situations. A public awareness campaign could help highlight the role citizens can play in protecting local wildlife, including understanding how to respond if they come across an injured wild animal in a disaster response.

The AVA believes well promoted and expanded public awareness campaign will not only enhance the overall readiness of our community in times of disasters but also go a long way towards ensuring the welfare of domestic, commercial and wild animals. For example, the NSW Department of Primary Industries videos [#getreadyanimals](https://www.youtube.com/@NSWDPI_Ag/search?query=getreadyanimals%20)
https://www.youtube.com/@NSWDPI_Ag/search?query=getreadyanimals%20

The AVA urges governments to consider increasing public awareness for animal disaster preparedness and response arrangements as an integral part of any disaster risk reduction strategy.

3.4.7 Treatment DPIRD, or DBCA in relation to animals in Perth Zoo, will liaise with local government and other organisations to:

- determine the local veterinary capacity to meet animal treatment needs
- identify capacity gaps in animal treatment
- coordinate and control actions to address capacity gaps, including:
 - providing additional support for local veterinary practices
 - directing owners and carers to local veterinary practices coordinate with veterinary practices adjoining impacted areas to assist with animal treatment needs
 - facilitating veterinary professionals with the support of CAWE members
 - establishing triage sites for assessment and treatment (including euthanasia) of animals.

Where these actions relate to the welfare of wildlife, DBCA will advise the owner or carer of wildlife and wildlife parks. Where impacted animal treatments are implemented through the activation of the Plan, these will cease as soon as practicable after an emergency and the return of these animals to the owner/carer.

AVA Response:

The AVA believes that the first 2 points in section 3.4.7 should be included in *Part Two: Preparedness*, not *Part Three: Response*.

Determining the local veterinary capacity to meet animal needs and identifying gaps in animal treatment can, and should, be managed prior to an emergency incident. During the incident is not the appropriate time to discover that veterinary capacity and capability is not available, when this may be known prior to the event and measures taken to mitigate.



3.4.8 Euthanasia

Wherever possible, euthanasia activities will take place in consultation with the owner or carer. Where it is not possible to identify or contact the owner or carer of an animal and euthanasia is required, the owner or carer should be contacted as soon as is practical afterwards. Western Australia legislation provides powers for officers to euthanase an animal.

AVA Response:

The AVA was invited by DPIRD in 2023 to discuss matters relating to a veterinarian's legal authority to euthanase animals on welfare grounds. This was primarily related to where the person responsible for the animal is not able to be contacted to provide permission for euthanasia, which is a circumstance that can be expected in emergency situations.

The *Animal Welfare Act 2002 (AW Act)* is not clear on this ability for veterinarians, and the AVA has requested that the authority and wording be amended (as was included in the AVA's submission for the 2019-2020 review of the AW Act) to include a veterinarian's ability to euthanase animals on animal welfare grounds without the owner's consent. We have recommended that wording similar to that found in NSW legislation be adopted, which also covers where the cost incurred by the veterinarian in performing euthanasia procedures is able to be recovered.

While this area remains unresolved in legislation reform, we request that this ability is made clear in the State Support Plan.

3.5 Funding Arrangements for Emergency Response

Following the activation of this plan, DPIRD will provide the required animal welfare services at their own cost unless otherwise agreed prior to the provision of those services.

Additional information about funding in emergencies can be found in State Emergency Management Policy section 5.12.

The owner or carer is responsible for the costs associated with the welfare of his/her animal. Activities undertaken for the welfare of an animal should wherever possible, take place in consultation with the owner or carer. During an emergency, it may not be possible to identify or contact the owner or carer and an Authorised Officer may be required to undertake activities for the welfare of animal without prior consultation. Section 56 of the *Animal Welfare Act 2002* provides for a person who has incurred costs under certain sections of the Act to apply for the recovery of costs from the owner or carer.

AVA Response:

While it is the responsibility of pet and livestock owners to ensure the welfare of their animals during disasters, assistance is frequently required, often beyond the owner's financial capacity. A critical gap exists in the WA emergency response and recovery provisions, as it fails to include emergency veterinary care for disaster affected animals as an eligible provision.

As outlined in comments made to 1.0 and 1.4 of the State Support Plan, appropriate payment must be made to individual veterinarians and their team members for their time, and compensation made for the financial impact to veterinary businesses, when providing veterinary services in emergencies to attend to the welfare of animals privately owned or owned by government. A mechanism for how veterinary services are engaged, how this payment is calculated and received must also be included in the emergency response and recovery arrangements.



Furthermore, where the capacity to cover costs of veterinary services that have been provided to meet animal welfare legislation cannot be met by the owner/carer/responsible person of an animal, these costs must be met by government. It should not be the responsibility of private veterinary business to “apply for the recovery of costs from the owner or carer” to recoup expenses incurred while delivering public good services in emergency response situations.

A mechanism must be in place for private veterinarians to apply to government for the recovery of costs for those animals owned by the government (wildlife, displaced or stray) or where costs can't be met by an identified owner.

Additional input is provided here around the aspect of the National Disaster Recovery Funding Arrangements (DRFA)

The AVA recognises the significant importance of the current National Disaster Recovery Funding Arrangements (DRFA), a cost-sharing initiative between the Australian Government and State/Territory Governments. This arrangement provides much-needed financial aid to individuals, businesses, and communities affected by disasters. However, a critical gap exists in the DRFA provisions, as it fails to include emergency veterinary care for disaster affected animals as an eligible relief and recovery measure.

While it is the responsibility of pet and livestock owners to ensure the welfare of their animals during disasters, assistance is frequently required, often beyond the owner's financial capacity.

The absence of clear provisions for disaster impacted animals in the DRFA has led to a patchwork of government support for animal welfare in disaster situations, with support varying greatly across jurisdictions and often being inadequate or non-existent.

This inconsistency has created confusion among veterinarians, pet owners, farmers, wildlife rescue organisations, the general public, and emergency management personnel leading to uncertainty in crisis times when clear information is critically needed. The lack of clear and accessible information regarding the DRFA's coverage for animal welfare in disasters exacerbates this issue in States and Territories.

For veterinarians, this ambiguity around government support arrangements poses significant financial and operational challenges, often obliging them to shoulder the financial weight of disaster response for treating both owned, displaced and wildlife animals. This obligation and public good is not only imposed by community and government expectations, legislative regulations but is also rooted in their veterinary professional ethics and codes of conduct. Funding of these expectations is currently inadequate, such that veterinary care is often provided by veterinarians out of their own pocket or at reduced cost. This situation leads to a financial strain on private veterinary practices which in the short term can delay essential care for animals, potentially resulting in prolonged suffering. For animal owners, the confusion can exacerbate the stress and anxiety already associated with disaster events. In the longer term the inability to recoup costs associated with delivering public good threaten the viability of veterinary profession, a profession that is almost exclusively privately funded. Operationally this means an overall reduction of veterinary services available to the community.

To address these challenges, the AVA strongly advocates for a revision of the DRFA to explicitly include provisions for emergency veterinary care for disaster impacted animals. This inclusion is crucial for ensuring the provision of necessary veterinary services in disaster-stricken regions, safeguarding



animal welfare and reducing the financial strain on private veterinary businesses, farmers, wildlife organisations, and pet owners.

The AVA also emphasises the need for clear, concise, and accessible information regarding these provisions to be made available to the public and relevant professionals. This would help in standardising the interpretation and application of the DRFA across all jurisdictions, eliminate confusion, ensure consistency in animal welfare support, and ultimately better protect the welfare of animals during times of disaster.

In summary, the AVA appreciates the intent behind the DRFA but stresses the need for its expansion to include emergency veterinary care for disaster impacted animals, alongside the dissemination of clear information about these provisions, to enhance national resilience and animal welfare in the face of natural disasters.

Part 4 : Recovery

AVA Response:

Animal Disaster Impact Reporting

The SSP does not include the collection of data and reporting of the impact of emergencies on animals. The AVA recommends this should be included in the SSP and suggests all disaster impact reporting should include data on animal injuries and deaths. Such animal welfare information would provide a more accurate reflection of the disaster's impacts, thereby prompting a more suitable response from government, veterinarians and the public.

Current disaster reporting frequently fails to account for the wide-ranging and devastating effects on animals, including livestock, companion animals, and wildlife, by omitting comprehensive statistics on animal injuries and fatalities.

This oversight in disaster reporting contributes to a systemic underestimation of the impacts on animals, leading to a lack of government and public awareness, and consequently, insufficient support. While occasional disaster assessments do acknowledge the effects on animals, these instances are sporadic and lack a standardised approach. For instance:

- In the 2021 Western Australia Wooroloo Bushfire, over 100 veterinarians and nurses dedicated six days to identify, assess, and care for affected animals alongside search and rescue officers.
- The loss of 11,000 farm animals in the 2009 Victorian Black Saturday fires.
- During the 2019-20 bushfires, thousands of New South Wales farms endured significant livestock losses, with over 11,000 animals sheltered at evacuation centres and animal safe places. The widespread devastation of these fires led to nearly 3 billion native animals being impacted across Australia.
- The 2022 New South Wales Northern Rivers Floods resulted in 3,403 calls to the NSW Agriculture and Animal Services hotline, with 2,011 requests for assistance.

The above examples demonstrate the profound effect disasters can have on animal populations, yet such figures are not consistently included in official disaster impact reports. This lack of recognition hinders our collective understanding of the full scope of disaster impacts and the associated support requirements.



Confirmation of Roles and Responsibilities

8. Are the roles and responsibilities listed in the plan suitable, accurate and reflect your agency's roles and responsibilities in relation to animal welfare in emergencies?

If your agency or organisation does not have any roles or responsibilities that should be outlined within this plan, please select 'Not Applicable'.

No

9. Do you require any additional amendments to your agency's roles and responsibilities as outlined in State Support Plan?

Yes

AVA Response:

The AVA requests that its role be more clearly outlined in the State Support Plan. The following information has been provided to the CAWE.

The AVA's role in Emergency responses

The AVA plays an instrumental role in championing and empowering the veterinary profession to thrive by providing a voice, education, community and support. The AVA also advocates strongly for animal welfare and the work that veterinarians do to support and enhance animal welfare in every aspect of their professional lives. Veterinarians aiding the government's response in emergency (disaster) situations is essential for animal, and human, welfare.

For emergency responses that are coordinated by other stakeholders, the AVA will facilitate communications through our member channels to request the assistance of private veterinarians.

DPIRD has confirmed that during an animal welfare response under the coordination and command of DPIRD and following the activation of the [State Support Plan for Animal Welfare in Emergencies](#), all veterinary professionals undertaking duties prescribed by this incident command will be covered for professional indemnity protection under DPIRD's insurance policy. This removes the need for Volunteers to be employed by DPIRD to access cover during a formal response.

The AVA suggests that the WA SSP uses similar wording as found in the [New South Wales State Emergency Management Plan - Agriculture and Animal Services Functional Area Supporting Plan](#), where the role and responsibility of the AVA as a supporting organisation is clearly defined.



Specific Amendments

The comprehensive review of the State Support Plan - Animal Welfare in Emergencies (SSP - AWiE) has led to proposed amendments to the State Emergency Management Plan (State EM Plan) and a proposal to request that DPIRD is assigned as a supporting organisation within the *Emergency Management Regulations 2006*.

Proposed amendments to the State EM Plan include:

- Reference to the State Support Plan - Animal Welfare in Emergencies within the Animals subsection of State EM Plan section 4.6.1 Specific Arrangements.
- A new State EM Plan section 5.3.4 summarising the State Support Plan - Animal Welfare in Emergencies arrangements.
- Inclusion of DPIRD as an Emergency Support Service for the coordination of animal welfare services in emergencies. DPIRD roles and Responsibilities from State Support Plan - Animal Welfare in Emergencies included within Appendix E of the State EM Plan.
- Inclusion of coordinating animal welfare services in emergencies as a new function within Appendix F: Functional Responsibilities. The responsible agency listed as DPIRD.

10. Do you support the proposed amendments to the State EM Plan?

State EM Plan section 4.6.1 Specific Arrangements referencing SSP - AWiE.	Yes/ No -
No response	

New State EM Plan section 5.3.4: Animal Welfare in Emergencies	Yes/ No -
No response	

Appendix E: Inclusion of DPIRD as an Emergency Support Service	Yes/ No -
No response	

Appendix F: Inclusion of coordinating animal welfare services in emergencies	Yes/ No -
No response	

11. Please provide a reason for your answers to the above.

12. Do you support the proposal to request that DPIRD is assigned as a Supporting Organisation within the Emergency Management Regulations?

Yes

No

No response

13. Please provide a reason for your answer.

No response



General Comments

14. – 16. Submit any general comments, feedback or suggestions.

The AVA recommends that the [New South Wales State Emergency Management Plan - Agriculture and Animal Services Functional Area Supporting Plan](#) be used as an exemplar when reviews of the WA SSP are being considered, especially regarding the aspect of engaging and remunerating veterinarians for providing their services to owned animals.

A summary of the points made in the AVA's submission to this consultation is provided.

Financial Compensation and Indemnity Insurance: The AVA stresses the need for appropriate payment and compensation for veterinarians involved in emergency response for animals owned by the government. This includes mechanisms for calculating and receiving payment, and assurance of professional indemnity protection under DPIRD's insurance policy.

Roles and Responsibilities: The AVA advocates for clearer definitions of its role in the plan.

Preparedness and Capacity Assessment: The AVA suggests that certain preparedness activities, such as determining local veterinary capacity and identifying gaps in animal treatment, should be conducted before an emergency incident rather than during the response phase.

Wildlife and Unowned Animals Responsibility: The AVA underscores the importance of not obligating veterinary professionals to perform emergency response work without proper compensation.

Impact Reporting: The SSP does not currently include data on the impact of emergencies on animals, which the AVA recommends be addressed. Comprehensive disaster impact reporting, including animal injury and death statistics, would provide a more accurate reflection of disaster effects, prompting more suitable responses from the government, veterinarians, and the public.

Public Awareness: The AVA emphasises the critical role of public awareness in ensuring animal welfare during disasters and calls for increased government-funded campaigns tailored to animal disaster preparedness. Such initiatives would educate the public on creating disaster plans for animals, microchipping, evacuation arrangements, and wildlife protection, thereby enhancing community readiness and reducing pressure on emergency and veterinary services.

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