

21 December 2020

Ms Kris Duthie
Director of Legislative Reform
Animal Welfare and Regulation Policy
Agriculture Victoria
Department of Job Precincts and Regions

Via email: legislationreform@agriculture.vic.gov.au

RE: A New Animal Welfare Act for Victoria

Dear Ms Duthie,

WoolProducers Australia (WoolProducers) is the peak industry body representing Australian wool growers across a vast range of issues from animal health and welfare, biosecurity, natural resource management, emergency animal disease outbreak preparedness, and industry development -including research and trade. WoolProducers welcomes the opportunity to provide a submission to the proposals offered in '*A New Animal Welfare Act for Victoria Directions Paper*'.

Animal welfare is a key priority for WoolProducers, to this point I draw your attention to the WoolProducers Animal Welfare Statement (Attachment A), as endorsed by the WoolProducers executive in November 2018.

Following consultation with WoolProducers' members I am pleased to offer our broad endorsement of the submission provided to you by the Victorian Farmers Federation (VFF), however I wanted to take this opportunity to raise several areas of key importance or specificity to wool producing farming operations.

Theme 1- Safeguarding Animal Welfare

1.1 Animal Sentience

WoolProducers is not supportive of the inclusion of animal sentience in the draft Bill under any of the three options offered in the directions paper. WoolProducers acknowledges that animals are able to feel and perceive the world around them, and in this sense is supportive of best practice management procedures that achieve positive health and welfare outcomes over the lifetime of an animal.

While not supporting the explicit inclusion of sentience in the draft Bill, WoolProducers considers that an acceptable outcome in regard to this matter can be achieved through a combination of legislation and adherence to industry publications, such as the *Australian Animal Welfare Standards and Guidelines for Sheep (AAWS&Gs)*, as referenced in WoolProducers Animal Welfare Statement.

1.2 Minimum Standards of Care

WoolProducers is supportive of the introduction of requirements in relation to the provision of a minimum standard of care for animals, which are outlined in the AAWS&Gs. Minimum standards should focus on a duty of care to ensure that the Five Domains of Animal Welfare model are adhered to.

WoolProducers is supportive of the VFF submission in which the minimum standard of care is described as a duty of care subject to breach when an individual does not undertake reasonable steps to provide for an animal's primary needs when taking the context of individual situations into account. This approach acknowledges that Australian farmers deal with a range of irregular conditions from extreme cold events to bushfires and their animal management decisions depend on the situation.

1.3 Prohibited Acts

WoolProducers is supportive of the views provided by VFF to this point. WoolProducers is concerned that certain essential animal husbandry procedures, such as mulesing, tail docking and castration may be added to the list of prohibited acts in the future. WoolProducers endorses adherence to best practice, such as that outlined in the AAWS&Gs, where such procedures are required to achieve the best lifetime outcomes for livestock. Until such time as universally acceptable alternatives are available which achieve the same lifetime health and welfare outcomes for animals the Bill (and associated subordinate legislation) must not prohibit, or unduly restrict the performance of such procedures.

1.4 Controlled Procedures

WoolProducers endorses the VFF submission on this point in full.

Theme 2- A simplified and flexible legislative framework

2.1 Consistency of the Framework

WoolProducers endorses the VFF submission with regards to this point. There must be a clear acknowledgement of the differences between companion animals and livestock and between differing production systems; such differentiation can only be achieved under a framework developed under Option 1.

2.2 Clarity of the framework, AND;

2.3 National Codes of Practice, Standards and Guidelines

As outlined previously, WoolProducers is supportive of the adoption of *the AAWS&Gs* as the basis for best practice. Referencing such publications will ensure that the Bill remains contemporary and of relevance to industry.

2.4 The role of co-regulation in the framework

While WoolProducers welcomes industry initiatives that assist in achieving animal welfare outcomes under an assurance and verification framework, we acknowledge that these frameworks are (generally) voluntary and come at some cost to growers. Any co-regulation that is incorporated into the framework would need to be further explored before WoolProducers could offer further comment; however, an underlying principle would be that such an arrangement would not come at a higher financial cost or resource burden for producers than that which is present under existing legislation.

2.5 The role of science in the new framework

WoolProducers is supportive of Option 3. This option would align best with the AAWS&Gs development process.

Theme 3- A better compliance and enforcement model

3.1 Monitoring compliance

While WoolProducers is supportive of more proactive risk-based models to monitor compliance, we hold some concerns. The use of broader powers, particularly in relation to the conduct of routine audits and inspections, with and without prior notice will require further consultation. Such activities may unnecessarily inhibit the ability of producers to undertake their business activities without unreasonable inconvenience. Further such activities would need to consider the likely improvement of animal welfare outcomes compared to alternative use of resources (e.g. extension and training activities).

3.2 Permissions and restrictions

Given the direct reference to restricted activities including the likes of rodeos and scientific research involving animals (as opposed to activities listed under 1.3 and 1.4) WoolProducers has no views on this point.

3.3 Set out clear alternatives for managing seized animals

WoolProducers endorses the VFF submission on this point in full.

Again, I would like to thank you for the opportunity to lodge a submission and would welcome further consultation as the legislative development process commences.

Please do not hesitate to contact me on 0455 442 776 should you wish to discuss any issue raised in this letter.

Yours Sincerely,



Adam Dawes
General Manager
WoolProducers Australia
adawes@woolproducers.com.au

Encl.

- A. **WoolProducers Australia Animal Welfare Statement (November 2018)**
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Attachment A

WoolProducers Australia Animal Welfare Statement (November 2018)

Introduction

Animal welfare is a key priority for WoolProducers Australia, and as the peak national body for the wool industry in Australia, we believe that the industry will benefit from a united approach to animal welfare. Individuals involved in the wool industry and its supply chains must take a proactive approach to ensure that a positive welfare state is achieved for each animal in their care. WoolProducers encourages industry stakeholders to adopt this statement as their own.

Our position

Welfare is a broad term that is not easily defined, but it is a state that exists within every animal and therefore must incorporate the physical and mental well-being of the animal. An animal is in a positive state of welfare when it is healthy, comfortable, well nourished, safe and able to express natural behaviours, indicated by science-based evidence. Good husbandry and veterinary practices and sufficient availability of resources enable a positive welfare status to be achieved.

All husbandry activities should be conducted to the highest possible welfare standards, and only be conducted when the lifelong benefit to the animal outweighs any short-term adverse welfare impacts.

It is the responsibility of every person involved in Australia's wool industry to achieve a high standard of animal welfare so that each animal in their care lives in a positive welfare state. As such, WoolProducers adopts the Five Domains of Animal Welfare Model. The Model provides a foundation to guide welfare management objectives that achieve a positive welfare state for each individual animal. We support unbiased scientific, evidence-based approaches to determine clearly defined and measurable welfare states.

Our commitment

WoolProducers demonstrates our ongoing commitment to the positive welfare states of animals in the wool industry through our policy and advocacy efforts. This is evidenced by WoolProducers' commitment to:

- Supporting the Australian *Animal Welfare Standards and Guidelines for Sheep*;
- Supporting the development of a sheep husbandry best practice guide;
- Endorsing voluntary self-regulatory animal welfare programmes to progress best practice management;
- Supporting required standards of animal management necessary to maintain necessary animal health needs;
- Seeking to achieve sustainable animal welfare improvements by pursuing scientific measurement of minimum standards, at the herd or flock level;
- Achieving animal welfare decision making mechanisms that reflect the credibility of participants;
- Ensuring coordinated animal welfare research efforts;
- Supporting investment in finding an alternative to mulesing and phasing out the practice when a universally accepted alternative is available;
- Promoting the use of pain relief; and,
- Endorsing the IWTO International Wool Specifications.

Implementation

WoolProducers' Executive and Animal Health and Welfare Committee endorse this Welfare Statement. Responsibility to meet the expectations of this statement lie with all who are involved in the Australian wool industry.