

30 June 2024

Animal Welfare Strategy Renewal Team  
Department of Agriculture, Fisheries and Forestry

*Submitted via DAFF's Have Your Say portal*

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Dear Team Members

**RE: RENEWING THE AUSTRALIAN ANIMAL WELFARE STRATEGY**

Australian Dairy Farmers (ADF) welcomes this opportunity to provide its position on the renewal of the Australian Animal Welfare Strategy (AAWS).

As the national representative body for dairy farmers across the six dairying States, ADF's mission is to improve the productivity and sustainability of dairy farmers in Australia. Part of its responsibility therefore rests with overseeing the implementation of, and compliance associated with, sound animal-welfare practices across all animals in dairy farmers' care.

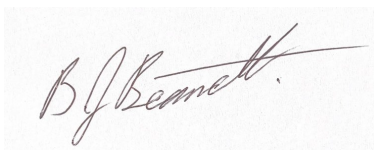
The peak representative body for dairy processors, Australian Dairy Products Federation, has been consulted to ensure ADF's submission reflects whole-of-industry responsibility for animal welfare.

Individually and through its membership of the National Farmers Federation, ADF has been a consistent supporter of the AAWS since its inception in 2004 and has maintained its call for the AAWS to be reinstated since its demise under the Abbott Government in 2013.

ADF therefore welcomed the Government's recent commitment of approximately \$5m over three years to have the AAWS renewed. Having said this, ADF believes three years to be excessive and that more money may be required in the long run to see the new AAWS fully developed and an associated implementation plan agreed and enacted.

Please find attached ADF's detailed submission in response to the Discussion Paper released by the Department for feedback.

Yours sincerely



Ben Bennett  
**President**

Att: ADF Submission

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## Submission to the Department of Agriculture, Fisheries and Forestry

### Renewing the Australian Animal Welfare Strategy

30 June 2024

#### OPENING COMMENTS

In its role as the peak national body representing dairy farmers across Australia, Australian Dairy Farmers (ADF) supports the renewal of the Australian Animal Welfare Strategy (AAWS).

ADF was an active participant in the AAWS process since its inception in 2004 and was disappointed when the Federal Government withdrew its support for, and custodianship of, the AAWS in 2013, allowing the AAWS to lapse in 2014.

In a letter dated 31 October 2018 to the then Minister, The Hon Joel Fitzgibbon MP, the NFF — with support from ADF — indicated the importance for the 'leadership and co-ordination void' to be filled:

*The devolution of the Australian Animal Welfare Strategy [in 2013] largely removed the Australian Government's presence in national agricultural animal welfare policy matters. The Australian Government must re-establish its presence in national agricultural animal welfare in a partnership with industry that sees industry playing a strong role.*

In supporting the renewal process, ADF strongly urges genuine acknowledgement that animal welfare is a shared responsibility. That is, those whose wellbeing is dependent on the health and welfare of animals must be included as equals throughout, thus ensuring maximisation of ownership and adoption of the final Strategy and associated governance structure.

On the issue of a National Statement on Animal Welfare (noting this as separate from the Vision Statement), ADF has detected from DAFF a preference for having this dealt with as a matter of priority. If this is so, ADF disagrees. Such a Statement will need to be developed with care and widespread ownership/buy-in, which might prove difficult in the current environment of disquiet, particularly around the political decision to ban the live-sheep trade.

When drafting the National Statement, ADF believes it must be:

- succinct;
  - acceptable to all groups involved in the proposed AAWS chapters; and
  - reflective of existing animal-welfare statements devised and held by groups (including the National Farmers Federation) involved in the AAWS renewal process.
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## RESPONSE TO QUESTIONS IN THE DISCUSSION PAPER

TOPIC/QUESTION		ADF RESPONSE
<b>Vision</b> ("To establish an Australian animal welfare system that brings stakeholders together, identifies national priorities with actions and outcomes, and demonstrates to the public and international partners that Australia values the welfare of all animals." [Discussion Paper, p. 6])		
1	Does this vision statement reflect everything you feel an AAWS should aim to achieve?	<p>No, this draft vision is too long and is inadequate for several reasons:</p> <ul style="list-style-type: none"> <li>• The focus is on a 'system' ... it should be on the animals.</li> <li>• The tasks of 'bringing stakeholders together', 'identifying priorities' and 'demonstrating Australia values the welfare of animals' are placed upon 'the system' and not the people devising the system.</li> <li>• Indicating the end goal as, "Australia <i>values</i> the welfare of animals" needs strengthening.</li> <li>• It fails to reflect ambition, leadership and best-practice.</li> <li>• It lacks reference to national harmonisation and international alignment.</li> <li>• The Vision as drafted reads more like a Mission, Objective or Process to achieve a Vision.</li> </ul>
1a	Is there anything else it should include?	<ul style="list-style-type: none"> <li>• The Vision of the 2010-14 AAWS presents a better starting point: "All Australians value animals and are committed to improving their welfare." This was well workshopped and widely accepted at the time.</li> </ul>
<b>Workstreams</b> (Leadership and coordination; Research and development; Standards and implementation; Education and communication; Reporting and compliance; International engagement.)		
2	Do the above proposed streams cover the right priority areas for the strategy?	<ul style="list-style-type: none"> <li>• ADF is happy with the proposed streams, noting community, customer and consumer expectations, and mounting reporting requirements, are captured within the workstreams.</li> <li>• When compared with the "four primary areas of work" established under AAWS 2010-14 (i.e., animals, national systems, people and international), the six streams proposed appear more clearly delineated and comprehensive.</li> </ul>
2a	Are there other priority areas that you think are important and should be added to the strategy?	<ul style="list-style-type: none"> <li>• No, see under #2.</li> </ul>
2b	Are there any you feel are not a priority area?	<ul style="list-style-type: none"> <li>• ADF considers all the proposed Workstreams important.</li> <li>• If it were to nominate any of greater importance than others, ADF sees 'Leadership and coordination' and 'International engagement' deserving of early attention. <ul style="list-style-type: none"> <li>○ The absence of leadership and coordination since 2013 has, one could argue, led to a lack of progress with development and implementation of animal-welfare standards around Australia and to a widening chasm between the policy positions of industry organisations and respected animal-welfare organisations.</li> <li>○ Internationally, Australia's reputation as a country that cares for animal welfare was boosted by the existence of the AAWS.</li> </ul> </li> </ul>

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		Although noting the excellent progress on animal-welfare issues by individual producing sectors over the past 10 years, Australia's international reputation declined with the cessation of the AAWS in 2014.
3	Are there any shared factors affecting animal welfare that cut across all, or multiple, animal groups? <i>For example: Climate change, innovation, workforce retention.</i>	<ul style="list-style-type: none"> <li>• AAWS 2010-14 included three 'across-silo' elements: R&amp;D, Communications and Education. By DAFF's folding these into Workstreams for the proposed new AAWS, ADF recognises scope for exploring such concepts in greater detail and in specific reference to each of the proposed chapters individually. ADF therefore supports this approach.</li> <li>• ADF would argue Climate change (as it affects animal welfare) is deserving of its own priority area. If it's important for human health and welfare, it's important for animal health and welfare.</li> </ul>
3a	How can the Australian Animal Welfare Strategy address these in a practical way?	<ul style="list-style-type: none"> <li>• ADF would support this question being put to participants in a workshop or similar called by DAFF to facilitate chapter-by-chapter discussion on principles and details to be included in the drafting of the AAWS. For the Livestock and Production Animal chapter, this engagement should be offered to stakeholders from across the supply chains.</li> </ul>
<b>Challenges</b> (The system aims to strike a balance between the interests of humans and animals, promoting responsible pet ownership, humane treatment of livestock, and the regulation of activities like research, recreation and entertainment.)		
4	What do you think are the biggest challenges facing Australia's animal welfare system?	<ul style="list-style-type: none"> <li>• One significant challenge rests with the often-diametrically opposed policy positions of the agricultural sector and animal-welfare 'interest groups'. The previous AAWS and associated Animal Welfare Advisory Committee (AWAC), which included senior representatives from RSPCA and Animals Australia as members, went a long way in helping bridge the gap. The dissolving of AAWS and AWAC led to a much-diminished interaction between holders of opposing views, with governments since then having to broker or force 'deals' where needed, often after lengthy delays.</li> <li>• Community considerations of farming of animals for food purposes is becoming increasingly driven by anthropomorphic attitudes towards companion animals and a widening gap between agricultural and urban lives.</li> <li>• Finding the appropriate balance will continue to be challenging for policy makers and legislators. The renewed AAWS must be targeted at bringing opposing groups closer together, at least for improved dialogue if not policy development in the first instance.</li> <li>• Other challenges for consideration include sustainable funding, position of extreme activist groups, and national harmonisation.</li> </ul>
5	Are there additional challenges in the animal welfare system that have not been listed above, which the renewed strategy	<ul style="list-style-type: none"> <li>• The federated system is the weakest link and one of the biggest challenges in Australia's animal-welfare system. Under AAWS, much of this weakness was overcome through collaboration, particularly in the development of Standards and Guidelines (S&amp;Gs) for Livestock Transport, Cattle and Sheep; however, weakness again appeared when the time came for applying the Standards consistently across</li> </ul>

TOPIC/QUESTION		ADF RESPONSE
	should consider?	<p>all jurisdictions once the previous AAWS was dissolved in 2014.</p> <ul style="list-style-type: none"> <li>• The renewed AAWS can be used to push the agenda of reform where appropriate. There remain unresolved S&amp;Gs for some animal groups, and existing S&amp;Gs are ready for review, and this at a time when already-developed S&amp;Gs are yet to be enacted by some jurisdictional governments after eight years.</li> <li>• Responsiveness to the pace of technology, innovation, consumer/ customer/ industry expectations should also be enhanced.</li> </ul>
<b>Opportunities</b> (Identifying opportunities for meaningful improvements in Australia's animal welfare system will be an important part of developing actions under a renewed strategy.)		
6	What do you think are the biggest opportunities for Australia's animal welfare system?	<ul style="list-style-type: none"> <li>• In a broad sense, the construction and acceptance of a well-balanced, national framework for the welfare of all animals in Australia would be a win. That is, if the 'system' is to be successful, the 'animals' and their carers must be the beneficiaries.</li> <li>• There will be an opportunity to schedule and implement a review of current S&amp;Gs and developing much-needed S&amp;Gs for sectors still without. Work in this area must reflect latest science and disregard amendments based on emotion alone.</li> <li>• There exists an excellent opportunity to reinstate recognition of Australia as an international leader in the development and implementation of animal-welfare standards. A strength of the previous AAWS was in its broad coverage of all animals in Australia; there appears a genuine commitment for this to be emulated through the renewed AAWS. If this is successful – and it should be if all parties unite – important trading partners and international organisations should be informed, and Australia's reputation improved.</li> <li>• An opportunity will be created for cross-collaboration and learning from across the livestock sectors and their respective supply chains. This would include animal-welfare elements of respective sustainability frameworks that have been developed since the last AAWS.</li> <li>• Above all, there will be an opportunity through the renewed AAWS to reconnect the livestock-farming community with the most respected of the animal-welfare groups, leading at the very minimum to more regular dialogue on contentious issues and greater opportunities for the development and implementation of animal-welfare policies with which all groups can operate.</li> </ul>
7	Are there additional opportunities for improvements in the animal welfare system that have not been listed above, which the renewed strategy should consider?	<ul style="list-style-type: none"> <li>• On a specific matter for the livestock sectors, use of pain relief for painful animal husbandry procedures has improved significantly since the previous AAWS; nevertheless, more can be done in providing access to affordable, approved compounds for such use. Additionally, pain relief should be more widely seen as an interim measure towards the adoption of non-invasive methods for replacing painful animal-husbandry procedures where possible. Coordination of research to this end is essential.</li> </ul>

TOPIC/QUESTION		ADF RESPONSE
		<ul style="list-style-type: none"> <li>• Another specific matter relates to virtual fencing (VF). This is a technology well-suited to the dairy sector; unfortunately, access to VF technology has been hampered for years in some jurisdictions by antiquated laws that have failed to keep pace with best-practice technologies and innovations. VF is indicative of matters that can be handled better under a renewed AAWS. (ADF acknowledges the work currently being done by the Animal Welfare Task Group and individual governments to allow access to VF.)</li> </ul>
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?	<ul style="list-style-type: none"> <li>• In the absence of the AAWS and AWAC, The Animal Welfare Collaborative (TAWC), chaired by Professor Alan Tilbrook from the University of Queensland and comprising a broad membership of industry and academic animal-welfare specialists, was formed to bring like-minded people together for resolving animal-welfare issues in an unbiased manner. TAWC has recently been 'hibernated' (its website is offline but its series of guest-speaker presentations can be found at <a href="#">TAWC Talks</a><sup>1</sup>); however, as a concept for incorporation in the renewed AAWS, it is worth considering.</li> <li>• ADF would support DAFF, as a next step, convening a face-to-face AAWS workshop involving parties interested in animal welfare, with the aim of setting the direction for further development. This could be done initially as a plenary workshop, followed by chapter-by-chapter group workshops. The 2010-14 AAWS should serve as a useful resource for the workshop, acknowledging that much of its content is still relevant. Also of use would be the sharing of advances made in animal welfare as part of individual sectors' sustainability frameworks and other mechanisms.</li> </ul>

<sup>1</sup> [https://www.youtube.com/channel/UCZJ3wbxQzJzv1z\\_3Jj4RniQ](https://www.youtube.com/channel/UCZJ3wbxQzJzv1z_3Jj4RniQ)