

7 August 2026

Emily Orchard-Mills
A/g Director - Australian Animal Welfare Strategy
Department of Agriculture, Fisheries and Forestry
70 Northbourne Ave, Canberra ACT 2601

Dear Emily Orchard-Mills

Re: Draft AAWS Overarching Strategy

Thank you for the opportunity to review the Draft AAWS Overarching Strategy.

Overall, the principles, goals and objectives align with expectations for the AAWS Strategy. However, we have some feedback regarding some areas of the document:

1. Strengthening the language in Priority Area 2

For the dairy industry, the absence of Commonwealth leadership in the Australian Animal Welfare Standards and Guidelines process has had significant consequences. It has contributed to delays in updating existing Standards and has affected the efficiency, consistency and perceived legitimacy of new Standards when developed. Harmonisation also remains incomplete, with the Australian Animal Welfare Standards and Guidelines for Cattle still not legislated in Victoria.

We therefore encourage AAWS to adopt stronger and more directive language throughout Priority Area 2 to reflect a clear ambition to support the development of Standards and the nationally consistent implementation and legislation of agreed Standards.

We also recommend including an additional goal under Priority Area 2 focused on strengthening and appropriately resourcing the Standards development process, including clear governance, stakeholder engagement and implementation pathways.

2. The language used in Priority Area 3

The wording of “Priority area 3: reporting and compliance – Establish systems to track outcomes and monitor compliance” on pages 4 and 10 raises concern, as neither the Australian Government nor AAWS has a compliance role in relation to domestic animal welfare. The goal and objectives for this priority area also do not appear to relate directly to compliance. Rather, they seem to focus on benchmarking and tracking change.

To better reflect the role of AAWS and the intended goal and objectives, we suggest revising this to: “Priority area 3: monitoring and reporting – Establish systems to track and benchmark outcomes.”

3. Objective 4a: informed funding of research priorities

In principle, this is an important priority for AAWS, as it could support research funders to work towards shared objectives. In practice, however, without a mechanism to bring funding bodies, research bodies and AAWS together to support prioritisation, collaboration and resource pooling, this objective risks being tokenistic.

To strengthen this objective, AAWS should more clearly demonstrate its role in facilitating these conversations.

We look forward to further correspondence and engagement regarding AAWS, and welcome you to reach out with any further questions.

Yours sincerely

Louise Sundermann
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