

RSPCA Australia
Pre-budget submission

Submission to the Treasury on the 2023-24 Federal Budget

January 2023

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Hon Dr Jim Chalmers MP
Treasurer
By email: PreBudgetSubmissions@treasury.gov.au

Dear Dr Chalmers

RSPCA's pre-budget submission 2023-24FY

The RSPCA appreciates the opportunity to provide this submission. We do so with the intention of assisting the Australian Government in its preparation of the 2023-24 Federal Budget. Animals are vital to Australia – socially, culturally and economically. We commend the government on its commitments to improve animal welfare to date, and trust these will underpin ongoing reforms. As such, this submission aims to assist with the prioritisation of funding to better protect animals and better reflect community expectations on the Federal Government's responsibilities for animal welfare.

Australians are increasingly concerned about animal welfare and expect the government to protect animals through effective public policy. Societal expectations on animal welfare are evolving and the Federal Government is seen as "highly responsible" (Futureye, 2018). Research from Roy Morgan (2022) highlighted that 98% of Australians consider animal welfare important and 80% support more government action to improve animal welfare. In our own recent *Public Perception Report*, 78% of respondents indicated that animal welfare is extremely or very important. We note that this level of importance has increased by 10 percentage points since 2018 (McCrinkle, 2022).

Animal welfare is also an increasingly important factor for industry sustainability, and Australia's international trade and reputation. Australia's animal use industries are broad – spanning aquaculture, agriculture, companion animals, recreation and sport, entertainment, healthcare, research and education, and tourism. They contribute billions of dollars to the economy and employ tens of thousands of Australians. While some industries consider animal welfare via assurance schemes, Australia's lack of federal regulation and standards has resulted in poor ratings in global comparisons of animal welfare protection (World Animal Protection, 2018, 2021). Given Australia's heavy reliance on animal agriculture and increasing community concerns, there is an urgent need for improvement.

Our mission is to prevent animal cruelty by actively promoting animal care and protection. We have more than 150 years' experience in animal welfare, and Australians recognise our organisation as the nation's most trusted animal welfare charity. Operating under a federated structure, the RSPCA comprises of RSPCA Australia and eight state and territory RSPCA member Societies. RSPCA member Societies care for and protect animals across the country through animal shelters, and in most jurisdictions, inspectorate services. Each year in Australia, the RSPCA:

- Receives and cares for more than 94,000 animals.
- Investigates tens of thousands of reports of animal cruelty and neglect.
- Educates Australians on animal welfare, responsible animal care and companion animal guardianship through school, community and online initiatives.
- Advocates for legislative and policy change to improve the lives of all animals.

Contemporary animal welfare science provides the basis for all RSPCA advocacy, education and policies. We engage proactively with a range of stakeholders including governments, government departments, industry and non-government organisations (NGOs) to improve animal welfare across federal and state/territory jurisdictions. The priorities outlined in this submission are consistent with the discussions we have had to date with relevant Ministers, Ministers' offices, federal department personnel, industry stakeholders and NGOs.

The RSPCA calls for the government to invest in two key priority areas in the May 2023 budget. The first is to invest in national leadership initiatives to improve animal welfare and the second is to support the humane and sustainable treatment of animals. We have outlined these priorities and provided nine budget recommendations. We have taken a conservative approach given the complexity of some of the proposed measures and the lack of available data for others. Therefore, our recommendations and the budget estimates provided are a starting point for further discussion and more detailed economic modelling.

Yours sincerely



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SUMMARY OF RECOMMENDATIONS – BUDGET PRIORITIES FOR 2023-24

Priority area	Action needed	Budget recommendations
Provision of national leadership in animal welfare	Increase funding for the Australian Animal Welfare Strategy	<ol style="list-style-type: none"> 1. Increase funding for the Animal Welfare Strategy from \$5 million to \$8 million over four years. 2. Front-load investment in the Animal Welfare Strategy with an initial \$3 million of funding in 2023-24 financial year.
	Prioritise the development of Animal Welfare Standards & Guidelines	<ol style="list-style-type: none"> 3. Employ additional departmental staff or consultants to enable concurrent progress on priority Animal Welfare Standards & Guidelines.
	Adequately fund the Inspector-General of Animal Welfare and Live Exports	<ol style="list-style-type: none"> 4. Adequately fund the office of the Inspector General of Animal Welfare and Live Export to enable: <ul style="list-style-type: none"> - employment of individuals with animal welfare experience - scrutiny of all federal regulations that involve animals.
	Fund the establishment of an independent statutory agency for animal welfare	<ol style="list-style-type: none"> 5. Provide \$20 million per annum to fund the establishment of an independent statutory agency of animal welfare.
	Dedicate adequate departmental resources to embed animal welfare in Australian trade agreements	<ol style="list-style-type: none"> 6. Prioritise animal welfare in Australian trade by investing in the development of a core set of animal welfare standards that can be advanced through trade negotiations.
Support the humane and sustainable treatment of animals	Prioritise independent collection and oversight of animal welfare data and reporting	<ol style="list-style-type: none"> 7. Fund the expansion and independent collection of data by the Australian Bureau of Statistics on animal welfare outcomes.
	Support Australia's transition towards higher animal welfare standards	<ol style="list-style-type: none"> 8. Design structural adjustment packages for Australian farmers to transition out of live sheep exports and end the use of barren battery cage systems.
	Prioritise veterinary workforce sustainability	<ol style="list-style-type: none"> 9. Prioritise veterinary workforce sustainability and ensure veterinary demand is matched by supply.

NATIONAL LEADERSHIP IN ANIMAL WELFARE

Improving animal welfare within a federated system of government requires national leadership and coordination. Yet Australia currently lacks a national framework to support animal welfare improvements. While we recognise and appreciate the Federal Government's commitment to provide national leadership, budget allocations are needed to achieve meaningful outcomes. Therefore, the RSPCA seeks federal investment across several national initiatives to enable actual improvements in animal welfare. The required actions are outlined below and underpinned with our specific budget recommendations.

INCREASE FUNDING FOR THE AUSTRALIAN ANIMAL WELFARE STRATEGY

The RSPCA commends the Federal Labor Government for committing \$5 million to renew Australia's Animal Welfare Strategy (AWS) over four years. Investment in a revised AWS would be a positive step.

Federal funding for Australia's animal welfare strategy was rescinded in 2013. A decade on, the results of that withdrawal of funding have had grave consequences for the welfare of Australian animals and the country's international reputation. The development of national animal welfare standards has been stilted and industry progress towards higher animal welfare outcomes has stagnated, positioning Australia as a global laggard in animal welfare. This has caused significant public concern for Australians as well as international communities and trading partners.

We are concerned that \$5 million will be insufficient to renew the AWS to overcome the degree of Australia's stagnation on animal welfare improvements. Therefore, request funding of \$8 million for the AWS over the next four years. We suggest that the increase in funding should be provided partly by the Federal Government, and augmented by industry and state/territory government funding. This combined funded model was adopted for the past AWS, and we note that this request is conservative - based on the forecasted expenditure documented for the 2010-14 Australian Animal Welfare Strategy which exceeded \$8 million (Department of Agriculture, Fisheries and Forestry, 2011). Moreover, we recommend front-loading investment in the AWS with an initial \$3 million of funding in 2023-24FY. This initial injection would fund three key deliverables which would lay the foundations for a robust and effective long-ranging AWS:

- a. Animal Welfare Benchmark research and report
- b. Stakeholder consultation roundtables by industry
- c. Strategy design

Initial funding in 2023-24FY would ideally be followed by further funding in subsequent years to total \$8 million. That is, 2023-24FY invest \$3m; 2024-25FY invest \$3m; and 2025-26FY invest \$2m respectively with a review in advance of the 2025-2026 FY to assess success and future investment needs to continue to advance animal welfare in Australia.

Recommendation 1: Increase funding for the Animal Welfare Strategy from \$5 million to \$8 million over four years.

Recommendation 2: Front-load investment in the Animal Welfare Strategy with an initial \$3 million of funding in the 2023-24 financial year.

PRIORITISE THE DEVELOPMENT OF AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES

Australia's lack of national focus and resourcing for animal welfare improvements has resulted in inconsistent laws across state and territory jurisdictions. It has also resulted in complex, ineffective and ad-hoc development processes for animal welfare standards. All Australian states and territories agreed in 2005 that voluntary Model Codes of Practice for animal welfare should be updated and transitioned to nationally consistent Animal Welfare Standards and Guidelines (Animal Health Australia, 2022). Yet since that time only six Model Codes have been updated into Standards and Guidelines, and implementation in states/territory legislation has been inconsistent.

The current system whereby a state/territory lead is required to trigger the development or review of animal welfare Codes or Standards is ineffective. Leadership on animal welfare standards must be federal to ensure timely progress and harmonisation across jurisdictions. Furthermore, there is no standard review and development process - each review has been linear, as opposed to concurrent. The timelines for review and development have been extensive. For example, Australia's poultry standards were in review for more than seven years and are yet to be endorsed by state/territory governments. The pig standards' literature review was conducted in 2018 with no further progress to date. Similarly, the cattle, sheep and saleyard standards have seen delays in implementation across all states and territories (see Appendix 1 for more detail). This has resulted in antiquated Model Codes and Standards and Guidelines that are out-of-step with contemporary animal welfare science, industry innovation, global standards and public expectations.

The RSPCA is dedicated to participating in the swift development of Australia's animal welfare standards and remains committed to facilitating the implementation and enforcement of animal welfare legislation in state/territory jurisdictions where relevant. However, without federal leadership and funding, Australia's Animal Welfare Standards & Guidelines will continue to be inconsistent across jurisdictions and fall short of contemporary animal welfare science, industry innovation and international trends.

Therefore, we call on the government to provide national leadership on mandatory, nationally consistent animal welfare legislation, regulations and standards by providing dedicated funding to fix the systemic failures described. Additional resources are needed to increase the capacity of the Federal Department of Agriculture, Fisheries and Forestry, and ensure that standards and guidelines are addressed as a priority— this could be by employing additional staff or commissioning an Independent Panel to conduct literature reviews, gap analyses, stakeholder advisory group consultations, and draft standards. The RSPCA favours the involvement of an Independent Panel to ensure impartiality and relevant expertise required across the broad range of animal species that the codes and standards should cover.

Recommendation 3: Employ additional departmental staff or consultants to enable concurrent progress on priority Animal Welfare Standards & Guidelines.

ADEQUATELY FUND THE INSPECTOR-GENERAL OF ANIMAL WELFARE AND LIVE EXPORTS

The RSPCA is pleased that the government is investing in Australia's Inspector-General function for animal welfare. We understand that the government aims to expand the funding and function of the current Inspector General of Live Animal Exports to an Inspector-General of Animal Welfare and Live Exports. However, we are concerned that the remit of this role will not be broad enough.

The scope of the Inspector-General of Animal Welfare and Live Exports office should include all federal regulatory matters that relate to animals. It is important that the government improve Australia's regulatory framework in relation to all animal welfare issues under federal jurisdiction. These include:

- Welfare of kangaroos killed for commercial purposes
- Introduced animal management
- Wild animal management
- Research on Australian Government land
- Import and export of animal products – trade expectations
- Live export of all animals from Australia, including horses, companion animals etc

Each requires greater scrutiny, regulatory control, transparency and accountability to enable improvements.

Furthermore, it is vital that the office of the Inspector-General of Animal Welfare and Live Exports include individuals with animal welfare experience and credentials. Therefore, we would like to see adequate funding allocated to the Inspector-General of Animal Welfare and Live Exports function.

Recommendation 4: Adequately fund the office of the Inspector-General of Animal Welfare and Live Export to enable:

- **employment of individuals with animal welfare experience**
- **scrutiny of all federal regulations that involve animals.**

FUND THE ESTABLISHMENT OF AN INDEPENDENT STATUTORY AGENCY FOR ANIMAL WELFARE

Federal government agencies currently responsible for the productivity and efficiency of animal production industries are also responsible for animal welfare. There are inherent conflicts of interest for government departments expected to promote animal use industries while overseeing animal welfare. The Moss Review (2018) found that the 2013 cuts to animal welfare services contributed to a culture that neglected animal welfare responsibilities and that the Department of Agriculture struggled to balance its competing roles of promoting industry and protecting animal welfare.

The RSPCA recognises that the Federal Department of Agriculture has implemented the majority of the recommendations provided in the Moss Review. However, a federal independent statutory agency for animal welfare is required to enable consistency, expertise, accountability and impartiality in:

- Developing, coordinating and improving Australia's animal welfare standards.
- Harmonising state and territory animal welfare frameworks.
- Overseeing the development and implementation of national animal welfare initiatives.
- Providing independent and evidence-based advice to multiple areas of government on animal welfare.

Therefore, in reinstating its leadership role in animal welfare, the Australian Government should dedicate resources to a new national framework, which includes the establishment of an independent statutory agency dedicated to animal welfare. This statutory agency would facilitate expert input and advice to government from a broad range of perspectives, harmonise animal welfare standards across

jurisdictions, coordinate research funding to improve animal welfare outcomes, and in the long-term, oversee the AWS.

The RSPCA has long advocated for an independent statutory agency for animal welfare. Based on the expenditure of other similar agencies, we estimate that an annual budget of \$20 million per annum would be required. We see this initiative as a cornerstone of the government's federal leadership initiatives in animal welfare that would provide a solid framework for the other initiatives outlined in this submission. It is crucial to improving animal welfare in Australia.

Recommendation 5: Provide \$20 million per annum to fund the establishment of an independent statutory agency for animal welfare.

DEDICATE ADEQUATE DEPARTMENTAL RESOURCES TO EMBED ANIMAL WELFARE IN AUSTRALIAN TRADE ARRANGEMENTS

Animal welfare is essential to sustainable development with implications for all three pillars of sustainability – economic, social, and environmental. This should be recognised in any trade agreement that Australia is party to. Subordinating animal welfare for regulatory efficiency and export revenue exposes Australia to reputational damage, continued erosion of some of Australia's exporting industries' social license to operate, and a decline in consumer trust amongst national and international communities.

Australia's poor animal welfare status is recognised globally and has impacted the nation's trade relations with potential trading partners that value higher animal welfare standards (such as the United Kingdom and the European Union). If not addressed, this issue will continue to tarnish Australia's international reputation and has the potential to impact long-term future trade opportunities.

Acknowledging that Australia's international trade arrangements have traditionally been economic agreements, and that animal welfare has been recognised as a vital component of sustainable development, it is imperative that the Australian Government build capacity within the Department of Foreign Affairs and Trade (DFAT) or source expert advice from animal welfare subject matter experts to help inform decisions for trade arrangements that involve animals or animal products. This would foster more sustainable development practices, enhance Australia's international reputation, and support animal welfare improvements onshore and overseas with trading partners.

Therefore, the RSPCA requests investment into the provision animal welfare expertise within DFAT. We would specifically like to see investment in the development of a set of core standards on animal welfare that can be advanced through trade negotiations.

Recommendation 6: Prioritise animal welfare in Australian trade by investing in the development of a core set of animal welfare standards that can be advanced through trade negotiations.

HUMANE AND SUSTAINABLE TREATMENT OF ANIMALS

PRIORITISE THE INDEPENDENT COLLECTION AND OVERSIGHT OF ANIMAL WELFARE DATA AND REPORTING

There is a fundamental problem with transparency and access to data across Australia's animal use industries. In most cases, the primary sources of data are peak industry bodies and rural research and development corporations (RRDCs). Greater transparency of data and the methodologies deployed to collect data is needed. Public trust cannot be persuaded without transparency of the results of such research and data collection, and data should be accessible and reported on.

Adding to this problem, we note that the Australian Bureau of Statistics recently announced its intention to stop collecting and reporting on agricultural data. The RSPCA is deeply concerned by this change because it will further increase the existing lack of transparency and impartiality. The government must ensure impartiality, transparency and accountability from animal-use industries given the vital role that animals have in our economy and society, and given increasing public expectations.

Recommendation 7: Fund the expansion and independent collection of data by the Australian Bureau of Statistics on animal welfare outcomes.

SUPPORT AUSTRALIA'S TRANSITION TOWARDS HIGHER ANIMAL WELFARE OUTCOMES

The RSPCA commends the government's commitment to phase out live sheep export. We also acknowledge the government's leadership in publishing the Poultry Standards & Guidelines, which recommend an end to housing layer hens in conventional battery cages by 2036. Delivering on these two initiatives is vital to signpost Australia's transition towards higher animal welfare outcomes. Therefore, we seek the tangible commitment of funds in the 2023-24FY budget to support broad public consultation and the design of structural adjustment packages to enable swift and measurable transitions away from these inhumane and unsustainable practices.

Recommendation 8: Design structural adjustment packages for Australian farmers to transition out of live sheep exports and end the use of barren battery cage systems.

PRIORITISE VETERINARY WORKFORCE SUSTAINABILITY

Australia is experiencing labour shortages across several workforces that work directly with animals. We are specifically concerned by the workforce shortages in the veterinary profession. This issue will most certainly impact the welfare of animals in the short and long-term, with the probable result being low volume and overall lack of veterinary care and attention for animals.

Therefore, we urge the government to liaise with the Australian Veterinary Association (AVA) to co-develop a workforce recovery plan in 2023-24. The RSPCA supports the AVA's recommendation to prioritise veterinary workforce sustainability and ensure veterinary demand is matched by supply, as outlined in the AVA's 2023-24 pre-budget submission.

Recommendation 9: Prioritise veterinary workforce sustainability and ensure veterinary demand is matched by supply.

APPENDIX

OVERVIEW OF AUSTRALIAN ANIMAL WELFARE MODEL CODES OF PRACTICE AND STANDARDS & GUIDELINES

STANDARDS AND GUIDELINES	STATUS AS AT JANUARY 2023
POULTRY	<ul style="list-style-type: none"> - Eighth year in review, earmarked for discussion at Agriculture Ministers Meeting in Feb/Mar 2023 - High degree of public support to end battery cages - Industry call for completion for commercial predictability - Immediate completion/endorsement required
PIGS	<ul style="list-style-type: none"> - Full review and update of the MCOP needed - Literature review completed in 2018 - High degree of industry readiness and support
SHEEP	<ul style="list-style-type: none"> - Endorsed in 2016; implementation required - Strong potential for partial revision of specific sections (e.g., address key issues such as mandatory pain relief) - High degree of consumer and retailer support for pain relief and mulesing phase out - Potential sponsor exists – VIC has mandated pain relief for mulesing - High degree of industry readiness and support
LAND TRANSPORT OF LIVESTOCK	<ul style="list-style-type: none"> - Already on the Animal Welfare Task Group’s horizon planning - Endorsed in Sep 2012 – standards and guidelines should be subject to full review at least every 10 years
SLAUGHTERING ESTABLISHMENTS	<ul style="list-style-type: none"> - Development process underway, earmarked for completion by mid-2024 - High degree of public awareness of horse welfare at knackeries as well as unacceptable slaughter practices at domestic abattoirs following media exposés - Public consultation required
CATTLE	<ul style="list-style-type: none"> - Endorsed in 2016; implementation required - Strong potential for revision of specific sections (e.g., address key issues such as mandatory pain relief, etc) - High degree of consumer and retailer support for pain relief - Increased industry uptake of pain relief options
LAND TRANSPORT OF HORSES	<ul style="list-style-type: none"> - Process commenced - Stakeholder consultation completed in 2021 - We understand thoroughbred racing support standards to be progressed - Public consultation required
HORSES	<ul style="list-style-type: none"> - Development of full suite of standards for the welfare of horses is needed - High degree of public expectation following media exposés - Relative industry readiness following media exposés - WA recently drafted Standards & Guidelines for horse welfare – potential starting point for national horse welfare standards

FISH (AQUACULTURE)	<ul style="list-style-type: none"> - Development of new standards for the welfare of farmed fish needed - Increasing reputational risk for industry given recognition of aquatic animals as sentient - Potential sponsor exists in TAS given the state’s strong ties in aquaculture
INTENSIVE HUSBANDRY OF RABBITS	<ul style="list-style-type: none"> - MCOP is extremely outdated (1991) and needs review - Farmed rabbits suffer significant welfare issues - Seek sponsorship from state where rabbit farms operate e.g., VIC or WA
GOATS	<ul style="list-style-type: none"> - Standards and guidelines completed in 2015, however they were developed by industry and are voluntary - Review process should commence by 2025 (10-year review schedule)
SALEYARDS AND DEPOTS	<ul style="list-style-type: none"> - Standards and guidelines endorsed in 2018 - Implementation required - Review process should commence by 2028 (10-year review schedule)
EXHIBITED ANIMALS	<ul style="list-style-type: none"> - Review commenced 2014 - Endorsed by Ministers in 2019 - Review process should commence by 2029 (10-year review schedule)

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