

RSPCA Australia
Submission

Renewing the Australian Animal Welfare Strategy (AAWS)

30 June 2024

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Introduction

About the RSPCA

The RSPCA has been advocating for animals across Australia for 153-years. In that time, we have grown to be one of the nation's most trusted and recognised charities. Our mission is to prevent animal cruelty by actively promoting animal care and protection, and our vision is that all animals have a good life. As an evidence-based organisation we rigorously apply contemporary animal welfare science to inform all our advocacy initiatives, education programs and policies.

The RSPCA operates under a federated structure, comprising RSPCA Australia and eight state and territory RSPCA member Societies. RSPCA member Societies care for and protect animals throughout Australia by operating animal shelters, and inspectorate services in most jurisdictions. In 2023 in Australia, the RSPCA:

- Received and cared for more than 87,465 animals.
- Investigated almost 60,000 reports of animal cruelty and neglect.
- Educated and supported the community on animal welfare, responsible animal care and companion animal guardianship through school, community and online initiatives.
- Advocated for legislative and policy change to improve the lives of all animals across federal and state/territory jurisdictions by engaging with a range of stakeholders including governments, government departments, industry and non-government organisations.

Many RSPCA people from across the country were involved in the former AAWS before it was abandoned in 2013-14. We have drawn on this knowledge to inform this submission, which aim to assist with the development of a renewed strategy that will tangibly improve the lives of animals in Australia.

Good animal welfare

For over a decade now, Australia has lacked national oversight of animal welfare. This has significantly impeded progress in animal welfare policy and in the development and implementation of standards. Therefore, it is imperative that the AAWS promotes good animal welfare and creates an action-oriented pathway to proactively improve animal welfare in Australia. Australia's approach to animal welfare must evolve from merely preventing negative welfare outcomes. The welfare of an animal includes both physical and mental states. Ensuring good animal welfare goes beyond preventing pain, suffering or distress and minimising negative experiences, to ensuring animals can express their natural behaviour in an enriching environment, feel safe, have healthy positive experiences and a good quality of life. Enabling good animal welfare means providing animals with all the necessary elements to ensure their physical and mental health, and a sense of positive individual wellbeing. We discuss this through the lens of the Five Domains Model of Animal Welfare.

Human-animal interdependence

Animals are vital to the lives of all Australians, featuring in families, the environment and across multiple industries. Australia has one of the highest rates of companion animal ownership in the world, with an estimated 28.7 million companion animals sharing the homes of around 69% of domestic households.¹ Australia also produces billions of livestock, operates a significant number of other animal industries, and has some of the world's most diverse and iconic native animals. Therefore, it is imperative that the AAWS recognise the role of humans as a central and critical component to improving animal welfare in Australia. We discuss human-animal interactions in the context of One Health-One Welfare.

Contact

The RSPCA appreciates the opportunity to provide input into the renewed AAWS. We commend the Australian Government for funding the renewal of this much needed national framework and welcome further consultation. Please contact RSPCA's Senior Policy Officer, Joanne Webb, at jwebb@rspca.org.au for further detail or discussion.

¹ Animal Medicines Australia (2022). [Pets in Australia: A national survey of pets and people](#). Accessed online January 2024.

Fundamental inclusions

Over-arching principles

The RSPCA supports the broad scope of the proposed AAWS to address all animals. To guide the approach taken to strategic initiatives, we recommend developing Guiding Principles that underpin the AAWS to inform decision-making and actions related to animal welfare. Guiding Principles would foster cross-sectoral collaboration and communication; steer the development of strategic initiatives from the various AAWS streams and animal groups; and provide a collective source of truth to draw on should contentions, conflicts or counterproductive patterns emerge during stakeholder consultations.

Sentience

Sentience must be central to the AAWS. Recognising and understanding that animals are sentient is necessary to understand how an animal experiences their world, and to assess their welfare in different circumstances. Animal sentience is the capacity of an animal to experience different feelings such as suffering or pleasure². The science of animal sentience underpins animal welfare and is key to achieving positive change in attitudes and actions towards animals³, and meaningful improvements in animal welfare.

The Five Domains

The Five Domains Model of Animal Welfare (the Five Domains) should provide the basis for specific discussions on animal welfare improvements and challenges. The Five Domains is increasingly applied globally when considering the lived experience of animals in human care. It considers both negative and positive experiences that arise from physical and functional factors, which affect the overall mental state and welfare of the individual animal. Over the past 20 years this paradigm has been widely adopted as a tool for assessing the welfare impacts of research procedures, invasive animal control methods, and other interventions in animals' lives. It provides that merely minimising or resolving negative physical or mental states does not necessarily result in positive welfare, but may only provide, at best, a neutral state. Animals need more than a neutral state of welfare to have a good life.

Figure 1 – The Five Domains of Animal Welfare⁴



Integrating the Five Domains will help inform what Australia's future state on animal welfare should be. It will facilitate greater understanding of animal welfare across stakeholder groups and support the implementation of targeted measures that progress toward optimal conditions for animals.

² Broom DM (2014) Sentience and Animal Welfare. CAB International, Oxford.

³ Proctor H. Animal Sentience: Where Are We and Where Are We Heading? *Animals*. 2012; 2(4):628-639.

⁴ Mellor DJ, Beausoleil NJ, Littlewood KE et al (2020) The 2020 Five Domains Model: Including Human-Animal Interactions in Assessments of Animal Welfare. *Animals* 10(10):1870.

One Health – One Welfare

Animal welfare is interdependent on human health and environmental sustainability. This is reflected and broadly accepted in the global concepts of One Health and One Welfare. One Health is defined as an “integrated, unifying approach that aims to sustainably balance and optimise the health of humans, animals, plants and ecosystems. It recognises the health of humans, domestic and wild animals, plants and the wider environment (including ecosystems) are closely linked and interdependent.”⁵ One Welfare extends, and overlaps, with the One Health approach. One Welfare promotes the direct and indirect links between animal welfare to human wellbeing and the physical and social environment.⁶ As an extension of One Health, One Welfare considers mental health as well as physical health. It applies to zoonotic diseases and food safety, plus multiple other areas spanning animal-human interactions, such as animal cruelty reporting, farmer and animal professional mental welfare programs, biodiversity conservation and wildlife management programs, animal emergency protocols, and climate change.

The One Health – One Welfare concepts provide holistic, contemporary, and overarching themes which should inform the AAWS. Given the necessity for the development of an Australian Implementation Plan for One Health, and Australia’s progress with One Health initiatives such as the National Antimicrobial Resistance Strategy⁷, the AAWS should provide clear links to One Health with a focus on animal welfare. It should also specifically integrate the One Welfare approach to address the interdependence between animal welfare, human health and the environment - the One Welfare Framework would provide a useful model to apply to the strategy as it considers:

- the connections between animal and human abuse and neglect
- the social implications of improved animal welfare
- animal health and welfare, human wellbeing, food security and sustainability
- assisted interventions involving animals, humans and the environment
- sustainability: connections between biodiversity, the environment, animal welfare and human wellbeing.⁸

Timely and tangible outcomes

We acknowledge the complexities of developing a strategy to encompass the welfare of all animals and understand this will take time. However, allocating three years to develop the strategy alone, without delivering any outcomes that will have tangible improvements on at least some animals in that timeframe is not reasonable. The AAWS must drive action and deliver outcomes. Enabling an AAWS that provides a clear and cohesive roadmap for continuous improvement in animal welfare while fostering multiple early and meaningful wins for implementation will demonstrate the value of the strategy.

Failure to develop a dynamic, action-oriented strategy would generate several risks. Animal welfare in Australia already lags behind many countries within the Organisation for Economic Cooperation and Development (OECD) and is of increasing community concern, both domestically and internationally. Embedding tangible outcomes in the AAWS will signal leadership, as opposed to being purely symbolic. Demonstrating outcomes early will reinforce the value of the AAWS and mitigate the risk of it being retired under future governments. Not doing so will continue to risk:

- unacceptable animal welfare outcomes
- loss of trust in government regulation to adequately protect animals
- erosion of the social licence to operate for multiple animal industries
- decline in consumer trust for animal industries in general
- reputational damage to Australia as a sustainable producer of high-quality animals and animal products
- reputational damage to Australia as a responsible steward of iconic native animals.

⁵ One Health High-Level Expert Panel (OHHLEP), Adisasmito WB, Almuhairei S, Behravesh CB, Bilivogui P, Bukachi SA, et al. (2022) One Health: A new definition for a sustainable and healthy future. *PLoS Pathog* 18(6): e1010537. <https://doi.org/10.1371/journal.ppat.1010537>

⁶ CIC One Welfare website “About welfare” page. Accessed April 2024.

⁷ Australian Government (2019) – Department of Health and Department of Agriculture, Water and the Environment. *Australia’s National Antimicrobial Resistance Strategy – 2020 and Beyond*. Canberra, Australia.

⁸ *One Welfare Framework*, accessed online April 2024.

There are several ways to expedite tangible outcomes. The first is to increase funding. RSPCA is deeply concerned that the current funding allocated for the renewed AAWS will not enable tangible improvements in the short-to-medium term, and funding for the delivery of the strategy could be at risk with a change of government. Therefore, we strongly recommend bolstering funding to expedite strategy development and implementation and facilitate tangible outcomes before 2027.

Another way to expedite the strategy development and implementation is by reviewing the completed projects delivered under the previous AAWS for relevance. This would expedite outcomes and implementation in the first few tranches, assist to optimise past investments and expertise, and abate the risk of reinventing the wheel. Our experience is that the previous AAWS was effective in bringing key stakeholders together to collaborate on solutions-focused outcomes and that several chapters had delivered high quality outputs. AAWS initiatives that the RSPCA was previously involved in, and that we know were completed before the former AAWS chapters were disbanded, include:

- Agreement on the consistency of jurisdictional welfare legislation which comprised 23 aspects of legislation that should be consistent in Australia – this was highlighted as being the single most important issue in the livestock sector. Reviewing these in the first instance would expedite outcomes in the harmonisation of legislation across jurisdictions.
- Codes of Practice for cat and dog ownership – we believe a significant proportion of these codes remain relevant.
- Crisis Response for Animal Welfare – could be reviewed and applied as part of Australia’s disaster recovery plans.
- Livestock Handling Training Guide – should be reviewed and made available to livestock industries to implement.
- Livestock Biosecurity Network – could be considered in the context of the National Biosecurity Strategy Implementation Plan and updated to be integrated into the ‘Stronger Partnerships’ actions of that strategy as relevant.

Responses to Discussion Paper questions

Vision

Proposed vision statement:

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.

Question 1: Does this vision statement reflect everything you feel an Australian Animal Welfare Strategy should aim to achieve?

No, the statement does not reflect what the AAWS should aim to achieve - it states what the AAWS is intended to do as opposed to what it aims to achieve in the future. It does not reflect the interests of animals, the subject of the strategy, nor the need to improve the welfare of animals. The vision should be outcomes-focused, and the central focus must be to promote, protect and improve animal welfare.

Given Australia's reliance on animal industries, lagging animal welfare standards and lack of a national framework, the AAWS should address these deficiencies and commit to improving and protecting animal welfare in all aspects of society and industry. This goes way beyond a vision of bringing stakeholders together and identifying national priorities. Rather than demonstrating to the public and international partners that Australia values animal welfare, the vision must specifically commit to the implementation of demonstrable outcomes that will effectively improve animal welfare. The vision should be aspirational and articulate the desired future state. This should specifically include the promotion of good animal welfare in Australian society, the adoption of sound animal welfare standards and practices that respect animal sentience and foster positive interactions between humans and animals.

We note that the proposed vision statement is significantly different to the former AAWS vision. The RSPCA would be more comfortable building on the old statement than progressing with the proposed one unless significantly modified:

*The welfare of all animals in Australia is promoted and protected by the development and adoption of sound animal welfare standards and practices.*⁹

Whilst the old vision statement overlooks some important inclusions, such as sentience, it has a clear focus on promoting and protecting the welfare of animals via improved standards and practices. The old vision statement could be augmented to include sentience and acknowledge the role of humans in the provision of good welfare outcomes.

Understanding that buy-in to the vision of the AAWS is crucial for effective stakeholder engagement, it may be necessary to workshop any revised vision statement with key stakeholders early in the process.

Question 1a: Is there anything else it should include?

Yes, the vision should reflect the following elements:

- continuous improvement of animal welfare
- recognition of sentience
- the importance of positive and respectful interactions between humans and animals
- the role of humans in proactively improving animal welfare.

⁹ Department of Agriculture, Fisheries and Forestry (2008). 'The Australian Animal Welfare Strategy, Revised Edition Jun 2008.' Page 7.

Workstreams

Question 2: Do the proposed streams cover the right priority areas for the strategy?

Yes, the proposed streams cover the right priority areas for the AAWS although we have identified two additional workstreams that are important. We have provided comments specific to each stream in the table below. In addition, the RSPCA recommends that the proposed workstream structure should be supported by over-arching principles (as discussed on page 4) and collectively provide a consistent framework that can be applied across the animal chapters to avoid duplication of effort in each chapter. For example, rather than each chapter developing their own outputs on research or on standards, the respective workstreams for research and standards should provide the scaffolding for each chapter to apply in the development of research for that animal group. This would enable a consistent, efficient and equitable approach across animal groups, i.e. research and development, standards and implementation, education and communication, and reporting and compliance for animals with comparatively lower economic or societal value (such as invasive and native animals) are considered to the same degree as animals of higher economic or societal value (such as production and companion animals).

Proposed workstream	Comments
Leadership and coordination	<ul style="list-style-type: none"> • This stream should ensure independent governance arrangements are in place to avoid conflicts of interests amongst stakeholders and ensure independent and expert leadership is appointed. • It should develop key documents that underpin the AAWS, such as Guiding Principles and Theory of Change, to foster collaboration and communication between stakeholders, and guide the respective work of each of the Chapters.
Research and development	<ul style="list-style-type: none"> • This stream should include subject matter experts in animal welfare and relevant industries. • Must explore and consider higher welfare alternatives and opportunities to better protect animal welfare through refinement and improvement. • Conflicts of interest must be identified and appropriately managed given the prevalence of industry funded research. • Must have a focus on technology and innovation to support refinements and continuous improvements in animal welfare, rather than maintaining the status quo, i.e. innovations that improve animal welfare, as opposed to innovations that bolster industry productivity or efficiency alone. • Must support higher welfare practices not just focus on industry efficiency and productivity.
Standards and implementation	<ul style="list-style-type: none"> • Should expand the scope of Australia’s current limited suite of animal welfare standards and guidelines to include other animals in addition to production animals. • Should explore and address barriers to consistent and harmonised standards across state/territory jurisdictions. • Must ensure continuous improvements, timely implementation, and monitoring of the implementation of standards and guidelines across jurisdictions.
Education and communication	<ul style="list-style-type: none"> • Must promote best practice animal welfare and support continuous improvements. • Best practice must be defined by experts with reference to the Five Domains, not defined by animals industries alone. • Should consider involving animal welfare subject matter experts to inform stakeholders about the Five Domains. • Could incorporate social science e.g. surveying community and producer views, identifying barriers to behaviour change, identifying best practice (effective) communication and education strategies in animal welfare. • Should consider involving animal welfare subject matter experts to inform stakeholders about the Five Domains.
Reporting and compliance	<ul style="list-style-type: none"> • Must include measures on timeliness, implementation and enforcement of standards and guidelines. • Must address deficiencies in data collection and reporting on animal welfare outcomes.

	<ul style="list-style-type: none"> • Should be based on benchmark data to effectively track and measure +/- changes in animal welfare outcomes over time. • Should lead the development of a national system to track outcomes and monitor compliance. • Should foster consistent data collection across jurisdictions and sectors.
International engagement	<ul style="list-style-type: none"> • Opportunity to improve animal welfare in Australia, report on tangible outcomes and showcase this in a way that provides leadership in our local region and globally. • Should support opportunities for facilitating improved animal welfare in neighbouring countries through shared knowledge and resources. • Could provide a platform for the development of an <i>Animal Welfare Trade Policy</i>.

Question 2a: Are there other priority areas that should be added to the strategy?

Yes, we would recommend an additional stream to address the policy nexus straddling human-animal interactions in society today. This is a complex priority area spanning policy portfolios that are primarily people-based but that increasingly impact animals. Examples include, human services, domestic violence, health, housing and homelessness, trade, workforce issues (shortages and training) etc. While these portfolios may traditionally be beyond the scope of an AAWS, strategic initiatives developed via this stream would assist other government departments and institutions to align policies, programs and funding to better meet the needs of their constituents and account for animal welfare in the context of human-animal interactions defined by the One Health and One Welfare concepts. Suggestions on the title of this stream include ‘One Health – One Welfare’ or ‘Human-animal interactions’.

Question 2b: Are there any you feel are not a priority area?

Given the competing priorities and the limited funding that has been allocated to the renewed AAWS, the strategy should prioritise addressing domestic challenges. The primary focus of the strategy should be to address pressing animal welfare concerns within Australia, such as improving standards in domestic agriculture, companion animal welfare, wildlife conservation and the humane treatment of animals in animal-use industries.

Question 3: Are there any shared factors affecting animal welfare that cut across all, or multiple, animal groups? For example: Climate change, innovation, workforce retention.

Question 3a: How can the AAWS address these in a practical way?

Digital technology and artificial intelligence

Digital technology and artificial intelligence (AI) cut across animal groups. These factors impact animal welfare across various contexts, such as animal shelters, homes, farms, research facilities, sanctuaries, national parks, veterinary facilities, and zoos. Given the rapid intensification and proliferation of digital technology and AI, both should be considered a priority within the AAWS to ensure the physical and mental well-being of animals directly impacted, are adequately considered in the design, funding, development, implementation and evaluation of technology. The rapid pace of development and adoption for commercial efficiencies, risks overlooking animal welfare. Without due consideration, digital technology and AI have the propensity to negatively impact animals. Conversely, they can generate meaningful improvements in the lives of animals and support higher welfare outcomes. Research highlights the need for animal-centric technology design to support positive welfare outcomes, and existing challenges in the development of technology, such as the prevalent prioritisation of efficiency, profitability, and human preference over animal welfare improvements.¹⁰

The AAWS could address these challenges in numerous ways. This could include collaborations with Australian Universities that have researched animal welfare and digital technology and AI. It could also include synthesising the body of research available on the matter in Australia, conducting a gap analysis and identifying priorities deliverables that will facilitate

¹⁰ Webber S, Cobb M, & Coe J (2022). *Welfare Through Competence: A Framework for Animal-Centric Technology Design*. *Frontiers in Veterinary Science*, 9.

greater consideration of animal welfare in digital technology and ethically shape AI. The development of a framework for ethical principles to inform digital technological developments that impact animals is also needed and would apply across animal groups.

Biosecurity

Biosecurity and animal welfare are interrelated. Biosecurity threats can have serious consequences for the welfare of a range of animals including production animals, native animals, domestic animals and animals considered invasive. However, Australia's approach to biosecurity measures does not adequately consider animal welfare. Animal welfare must be prioritised alongside the risks to human health, the environment, Australia's food systems and economy, given the interdependencies between animal health and welfare, and human health (as outlined above in our discussion about the One Health – One Welfare approach). The AAWS must recognise this and ensure animal welfare is included in biosecurity measures in Australia in relation to biosecurity planning, funding and emergency responses to incursions. The strategy should help ensure the application of humane practices based on contemporary animal welfare science during biosecurity incursions.

Veterinary workforce shortage

Veterinarians are vital to support animal welfare, yet there is a concerning shortage of them in Australia.¹¹ This issue is negatively impacting the welfare of animals due to the lack of veterinary care and attention for animals especially in regional communities. Due to this shortage, animals are at risk of a lack of adequate and timely veterinary care that will most certainly inhibit good welfare across animal groups. A New South Wales (NSW) Parliamentary Inquiry recently explored this issue and published 34 recommendations for the NSW Government's consideration.¹² However, the matter must be addressed nationally. Therefore, the AAWS should aim to address the supply of veterinary expertise in alignment with Australia's use of animals, and support workforce sustainability nationally.

Climate change

Climate change has a significant impact on the welfare of all animals, whether living in the wild or under human care. Trends associated with climate change include an increased frequency, intensity and duration of extreme events such as heatwaves, droughts and bushfires. These trends are having, and will continue to have, extremely negative effects on animal health and welfare, both directly (e.g. increased risk of heat and cold stress) and indirectly (e.g. reduced availability of suitable habitat, decreased quantity and quality of food and water, changing distribution of infectious disease agents and increased risk of extreme weather events).¹³ Therefore, the AAWS should consider animal welfare in the formation and adoption of national, state and industry climate policy and policies related to drought, fire, flood and other extreme weather events. In particular, consideration and planning are required to address the displacement of humans and animals during climatic disasters. The AAWS should also identify and consider where climate change mitigation strategies may pose animal welfare risks and ensure adequate controls are in place to mitigate these risks.¹⁴

The RSPCA published research in 2020 which summarised observed and projected climate change, the impact on animal welfare and identified opportunities to help address these impacts.¹⁵ We recommend that this report should be used to help inform the AAWS in relation to climate change and animal welfare.

Ethics

Ethics should be recognised and discussed explicitly as part of the strategic process for the AAWS. The inextricable link between animal welfare and ethics is well recognised in animal welfare science. Unlike other scientific concepts, animal welfare involves notions of good or bad, better or worse and more important or less important, for the quality of an

¹¹ Australian Veterinary Association (2024). [Planning an effective veterinary workforce webpage](#). Accessed 28 June 2024.

¹² NSW Legislative Council (2024). [Veterinary workforce shortage in New South Wales](#). Report 58, June 2024.

¹³ Lacetera N (2019) [Impact of climate change on animal health and welfare](#). *Animal Frontiers* 9:26–31.

¹⁴ Shields S & Orme-Evans G (2015) [The Impacts of Climate Change Mitigation Strategies on Animal Welfare](#). *Animals* 5:361–394.

¹⁵ RSPCA Australia (2020). [Research Report: The impact of climate change on the welfare of animals in Australia](#).

animal's life.¹⁶ The ethical framework that is applied will most certainly shape outcomes¹⁷ and the degree of improvements in animal welfare. In addition, being explicit about ethics and values can also help to identify and characterise divergences in the approaches taken by different stakeholders. When stakeholders understand each other's values and ethical assumptions, this can help progress a decision where compromise is required, even in the face of disagreement. Therefore, ethics should be considered and discussed explicitly across all animal groups, in the development of any Guiding Principles, and through the provision of an ethical framework to support stakeholders to work through complex ethical decisions.

Sustainability

Sustainability is an important factor that cuts across all animal groups. Australia's agricultural heritage, unique biodiversity and traditional reliance on animal industries requires incremental improvements towards higher animal welfare practices to be balanced with economic feasibility. Industry sustainability is reliant on market access opportunities and social licence to operate. There is increasing competitive advantage to prioritising animal welfare as consumer concern continues to increase and trade opportunities with large, lucrative markets have proven contingent on the quality Australia's animal welfare standards. Additionally, the scientific links between animal welfare, human health and environmental sustainability have been tested and magnified by global events such as climate change and pandemics.

By taking a One Health-One Welfare approach as outlined earlier, the AAWS can address sustainability in a holistic manner that aligns with important discussions across Australia. This approach will also promote collaboration with academic institutions and research organisations to fill knowledge gaps, build a strong evidence base and ensure that policies and initiatives balance the needs and interests of animals, humans, and ecosystems.

Challenges

Question 4: What do you think are the biggest challenges facing Australia's animal welfare system?

The RSPCA agrees with the challenges listed in the Discussion Paper. The biggest challenges of those listed are that animal welfare is primarily a state/territory responsibility, and the complexity of the current national animal welfare standards and guidelines system.

Fragmented responsibility for animal welfare

Gaps exist in both federal and state/territory Ministerial responsibilities which currently preclude the adequate protection of, and improvements in, animal welfare. The Discussion Paper acknowledges that one of the biggest challenges is that animal welfare is primarily a state/territory responsibility, which creates challenges to a harmonised approach to decision-making or nationally consistent regulatory framework. While state/territory responsibility for animal welfare is prescribed in the Constitution and would be difficult to modify, the structure of Ministerial portfolios can and should be changed to include a Minister (or Assistant Minister) for Animal Welfare in all jurisdictions. In most Australian jurisdictions, current Ministerial structures limit the responsibility of the welfare of production animals to Ministers of Agriculture or Ministers for Primary Industries. In addition, whilst the welfare of animals is inherent to Environment portfolios in all jurisdictions, conservation is generally the primary focus over and above the welfare of animals that are considered invasive.

Complex animal welfare standards and guidelines system

The RSPCA supports the development of compulsory nationally uniform minimum standards for the welfare of all animal species used, managed or controlled by humans. These should be supplemented where appropriate with best welfare practice guidelines. The Australian Government withdrew funding for animal welfare and devolved its role in animal welfare to state and territory governments in 2013-14. A decade on, the result has been a lack of national focus and resourcing, competing roles of government departments, inconsistent laws across state and territory jurisdictions, and

¹⁶ Fraser, D (1995). *Science, Values and Animal Welfare: Exploring the 'Inextricable connection.'* *Animal Welfare*, 4(2).

¹⁷ Rollin, B (2015). *The Inseparability of Science and Ethics in Animal Welfare.* *Journal of Agricultural and Environmental Ethics*, Vol 28(4).

complex development processes for animal welfare standards. There are significant exemptions in existing standards and guidelines, and there are no standards or adequate codes of practice for several animal groups. Achieving consistency in animal welfare standards within a federated system of government needs national leadership and coordination.

The RSPCA has published a Position Paper on the development of nationally consistent animal welfare standards and guidelines.¹⁸ We recommend the Position Paper be used to help inform the AAWS and it can be [accessed here](#).

Question 5: Are there additional challenges in the animal welfare system that have not been listed above, which the renewed strategy should consider?

Yes, there are several other challenges in addition to those listed, and we outline these below:

Insufficient funding

Whilst we recognise and appreciate the \$5 million that the Australian Government has allocated for the establishment of the AAWS, appropriate resourcing and funding to support implementation and result in tangible welfare improvements will be critical to the success of the AAWS. The RSPCA is concerned that the allocated funding will not be sufficient to effectively overcome Australia's stasis on animal welfare. One year and \$1.2 million into the four-year cycle of the government's commitment to renew the strategy, the remaining \$3.8 million will likely fall short. This is based on the forecasted expenditure documented for the 2010-14 Australian Animal Welfare Strategy which then exceeded \$8 million.¹⁹ We accept that there are several efficiencies that could be gained by the renewed AAWS, such as conducting online meetings as opposed to face-to-face, and drawing on past outputs from the previous strategy instead of starting from scratch. However, it will be a challenge to stretch the current funding to effectively overcome the degree of Australia's stagnation on animal welfare improvements that have occurred since the previous AAWS was withdrawn. Increased funding should be provided via a combined funding model including contribution from the Commonwealth, as well as industry and state/territory government funding.

Lack of independence

Federal government agencies responsible for the productivity and efficiency of animal production industries are also responsible for animal welfare. There are inherent competing priorities for federal government departments expected to promote the competitiveness, efficiency and productivity of industries involving animals while considering animal welfare. The Moss Review (2018) found that the 2013-14 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.²⁰ This issue remains a significant challenge today. Therefore, ideally any federal government departments responsible for developing animal welfare policy should be independent of conflicting institutional objectives and adequately resourced with personnel who have animal welfare credentials. The RSPCA has long advocated for an independent statutory agency for animal welfare to enable impartiality and oversee the development and implementation of national animal welfare standards.

There is a risk of regulatory apprehension, where industry interests exert undue influence on policy and regulatory decisions, potentially leading to insufficient enforcement of animal welfare standards or the adoption of industry-friendly regulations that prioritise economic interests over animal welfare. Limited resources and competing priorities may lead to a disproportionate allocation of resources toward promoting agricultural interests at the expense of robust enforcement of animal welfare legislation. This can result in inadequate funding, staffing, and infrastructure for animal welfare enforcement agencies and programs.

¹⁸ RSPCA Australia (2024). [Development of nationally consistent Animal Welfare Standards & Guidelines](#), position paper.

¹⁹ Department of Agriculture, Fisheries and Forestry (2011). [Australian Animal Welfare Strategy \(AAWS\) and National Implementation Plan 2010-14 - DAFF](#).

²⁰ Moss, P. (2018). *Review of the Regulatory Capability and Culture of the Department of Agriculture and Water Resources in the Regulation of Live Animal Exports*, Department of Agriculture and Water Resources. Canberra, Australia.

Lack of animal welfare data

Another challenge is the lack of available animal welfare research that is independent of industry funding. This creates a gap in available research that could be important to improving animal welfare and may have long term commercial benefits (e.g. improved market access) but not immediate productivity outcomes. There is a lack of data collected and reported on regarding animal welfare in Australia. In most cases, the primary sources of data are peak industry bodies and rural research and development corporations. Greater transparency of data and the methodologies deployed to collect data is needed. This lack of impartial and consistent data collection and reporting inhibits effective, evidence-based effective measurement of animal welfare benchmarking and improvements over time.

Opportunities

Question 6: What do you think are the biggest opportunities for Australia's animal welfare system?

The RSPCA agrees with the opportunities listed in the Discussion Paper. The biggest opportunities of those listed are the strong research community focused on developing contemporary animal welfare science; that animal welfare has become part of national conversations; and the changing social licence for industry to operate which reflects the intrinsic value of animals and their importance to people.

Expand current evidence-base

The AAWS provides an opportunity to develop much needed independent research and better apply animal welfare science in the Australian community and across industries. Awareness of and improvements in animal welfare have arguably increased with the proliferation of animal welfare science. The more available evidence to substantiate what constitutes good animal welfare and how to achieve it, the more likely society and animal industries will evolve. Independent research provides the basis for change and continuous improvement. Scientific research is also imperative to counter the risk of sectors framing serious animal welfare problems as issues that need to be reframed, to become more palatable to the community, rather than making meaningful changes that genuinely address the issues.

There is also an opportunity to take a more transdisciplinary and cross-sectoral approach to actively increase the scientific evidence base for animal welfare. This can be achieved by opening-up to research and evidence derived from different modalities such as social science. In practice, the One Welfare approach as described above, calls for veterinarians and related animal services such as trainers, animal guardians, environmental scientists and human psychiatrists to collaborate and share expertise to care for the welfare of both animals and those responsible for animals. Extending the research base beyond traditional veterinary science modalities will enable a broader evidence base on which to improve animal welfare.

Community sentiment

Australians care about animals and are increasingly concerned about animal welfare. Community concern for animal welfare has increased since 2018 and independent research on consumer sentiment shows a very high proportion (98%) of Australians consider animal welfare important.²¹ Establishing a robust independent, democratic, accountable, science-based animal welfare system that reflects the community's values and contemporary science, will provide the opportunity to improve consumer trust and confidence.

The majority of Australians (80%) support more government action to improve the lives of animals, expect the government to protect animals through effective public policy²² and see the Federal Government as "highly responsible" for animal welfare.²³ As such, there may be an opportunity to increase community engagement in the development and implementation of animal welfare policy, and consideration should be given to how community input and feedback on AAWS initiatives, where relevant, will be managed as part of the AAWS.

²¹ McCrindle, 2022. *RSPCA Public Perception Report, 2022*.

²² Roy Morgan Research (2022). *Attitudes to Animal Welfare*.

²³ Futureye (2018). *Commodity or Sentient Being? Australia's Shifting Mindset on Farm Animal Welfare*.

Question 7: Are there additional opportunities for improvements in the animal welfare system that have not been listed above, which the renewed strategy should consider?

Many of our recommendations for further improvement of AAWS are outlined above. Further to these, we add:

Collaboration

An effective AAWS will enable collaboration with key stakeholders in Australia's animal welfare system. In our experience, the previous AAWS was highly effective in fostering collaboration and synthesising expertise to enable the development of practical and effective outputs. Sharing ideas and working together will enable greater efficiency and innovation. The disbandment of the old AAWS has made collaboration more difficult over the past decade.

Improve transparency

There is an opportunity to significantly improve transparency and accountability in animal welfare governance via the AAWS. This can be realised by providing access to information, data, and reports on animal welfare policies and practices to achieve shared goals and meaningful outcomes. This would demonstrate a commitment to openness, integrity, and ethical leadership which is much needed in Australia's animal welfare system.

National Statement of Intent on Animal Welfare

The RSPCA welcomes the collective intention of all Australian Agriculture Ministers to develop and publish a National Statement of Intent on Animal Welfare (the Statement). The statement should be ambitious and demonstrate a commitment to meaningful change that includes the development and timely delivery of the AAWS. It is vital that the Statement provide a foundation for tangible outcomes and meaningful improvements to the lives of animals both in Australia and globally in so far as Australia can influence positive change.

Domestic improvements

Domestically, the National Statement of Intent should:

- Recognise that animals are sentient, have intrinsic value to Australian society and the people in it.
- Recognise that the Australian community expects governments to protect and improve animal welfare through effective public policy.
- Include a commitment to strong leadership and direction on improving animal welfare nationally including an agreement to engage in the planning and delivery of the re-establishment of the AAWS.
- Include a commitment to work collaboratively across all sectors of government to ensure harmonisation of the legal minimum animal welfare standards across the nation, thereby providing clarity to trading partners on the acceptable legal minimum animal welfare standards that are in place nationally.
- Recognise successful improvements made by individual states and territories and that these successes should provide evidence of the ability to deliver significant change and thus provide a framework for change (e.g. mandatory pain relief for mulesing in Victoria, ban of battery cages for layer hens in the ACT).
- Identify key areas for short term, priority review including review of close confinement systems in the pig industry and mandatory use of pain relief during painful husbandry procedures, review of relative humaneness of wild animal control measures and development of horse welfare standards.
- Harness domestic expertise across Australia's network of peak agricultural bodies and research and development organisations, animal welfare organisations, research institutions and government, with agreement to continually improve and refine practices across Australia, with the goal to facilitate a better future for the nation's animals.
- Recognise that animal welfare challenges exist beyond the agricultural sector and that collaboration on welfare matters affecting wildlife, companion animals and other animals is critically important.

Global leadership

More broadly, the National Statement of Intent should:

- Acknowledge animal sentience and the need to protect animals globally.
- Commit to strong leadership on improving animal welfare internationally, including enhancing global animal welfare standards, investing in international programs that support and promote humane interactions with animals, and promoting humane and sustainable agricultural systems.
- Recognise the importance of animals, animal products and animal by-products used in trade and that refinements and improvements in animal welfare are crucial to a sustainable development.
- Support the work of the International Coalition for Animal Welfare to actively pursue programs in developing regions which promote the implementation of WOA standards.
- Collaborate with civil society groups (e.g. RSPCA International, the World Society for the Protection of Animals, Compassion in World Farming, International Fund for Animal Welfare and Humane Society International) to share knowledge and information across countries.
- Commit to the development and implementation of an *Animal Welfare Trade Policy* to guide Australian trade negotiations and partnerships.
- Recognise that Australia is one of the world's leading exporters of quality agricultural products and must thereby provide leadership to contribute to and invest in ethical and contemporary international animal welfare research and development, and the implementation of tangible improvements in practices impacting animal welfare.