

20 June 2024

Department of Agriculture, Fisheries and Forestry
Australian Government
Canberra ACT 2601

Dear Australian Animal Welfare Strategy Renewal Team,

My name is Dr. Tamasin Ramsay, and I am an anthropologist passionate about animal advocacy. My experience spans public health, political advisory work, and animal welfare, including my role as President of the Gariwerd Animal Biodiversity Alliance (GABA). GABA was founded on 21st March 2021 by residents of Western Victoria to protect animals, local ecology, and biodiversity. Our aims include protecting wildlife habitats, educating the public on the importance of native wildlife, and advocating for all animals and biodiversity. Our committee comprises experts in various fields, including animal advocacy, anthropology, law, ecology, and local First Nations culture. I write on behalf of GABA in response to the renewal of the Australian Animal Welfare Strategy (AAWS), expressing concern over current legislative protections and advocating for a more comprehensive, empathetic approach to animal welfare in Australia.

General comments

Over a decade has passed since Australia last held a national conversation on animal welfare. The opportunity to develop a new Animal Welfare Strategy is not just rare, it is pivotal for our future. It presents us with the chance to build a modern, holistic system that truly serves all of us - human and non-human alike. It is our firm belief that this process, which has the potential to significantly improve animal welfare, must be pursued with utmost dedication and adequate resources.

The refreshed AAWS must recognise the sentience of animals and their inherent worth. While safeguarding animal welfare can indeed generate numerous benefits for humans, I urge that the AAWS not be skewed towards these utilitarian benefits alone. We must also underscore the ethical reasons for protecting animal welfare. As the previous version of

the AAWS rightly acknowledged, it is sentience that makes animal welfare so vitally important.

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

We find the proposed vision lacking in its commitment to genuinely enhance and safeguard animal welfare. This, in my view, is the most crucial aspect of a vision for an animal welfare strategy. The AAWS vision must, at the very least, envision improved animal welfare. I strongly believe that the vision articulated in the 2008 AAWS surpasses the one proposed in the current Discussion Paper. It stated: "The welfare of all animals in Australia is promoted and protected by the development and adoption of sound animal welfare standards and practices". This is a vision that GABA can support.

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

We consider each of the proposed work streams to be integral to the effective execution of the AAWS. I anticipate that the Standards and Implementation stream will establish a robust national standard-setting framework, incorporating independent governance and mechanisms to hold jurisdictions accountable for implementation timelines. I also hope that the Research and Development stream will be appropriately funded by the government to promote independent research that is not influenced by industry funding. Lastly, I expect the Education and Communication stream to focus on community and industry outreach to ensure individuals are aware of their legal obligations towards animals and understand how they can enhance welfare outcomes. Furthermore, educating young people about the sentience, social interactions, intelligence, sensitivities and individuality of non-human animals is essential for a sustainable and compassionate future in Australia.

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.

Climate change affects all animals and, indeed, all life on our planet. Strategies that mitigate the direct effects of climate change on animals are crucial, as is the integration of animal welfare considerations into broader societal climate change mitigation and adaptation measures. The role of animals, who are often categorised as livestock, in climate change and the specific measures to manage this issue require careful consideration of the welfare implications for these sentient beings. It is important to recognise that renaming different species can desensitise us to the ways in which we exploit them.

Long-term shifts in public attitudes, values, and beliefs about animals will also impact all animal sectors. The AAWS should facilitate the monitoring of such trends to ensure our

approach to animal welfare remains relevant and aligned with public values and expectations. This will also help animal-based industries plan for future adjustments to practices to ensure their sustainability.

Questions 4 & 5. What do you think are the biggest challenges facing Australia's animal welfare system?

The greatest challenge facing Australia's animal welfare system is its lack of independent governance. Oversight of Australia's animal welfare strategy, policy and standards is currently delegated to ministries and departments of agriculture via the Agriculture Senior Officials Committee and ultimately the Agriculture Ministers Meeting. This poses a problem due to the conflicting priorities of these entities. Their primary function is to support Australia's agriculture industries, often prioritising the increase in gross value of production over animal welfare.

This lack of independent governance is not only detrimental to animal welfare but also undermines democratic principles by hindering the manifestation of the public's will. Recent research by BehaviourWorks Australia revealed that over 86% of Australians believe the law should mandate good welfare for all sentient animals, and over 80% believe that final decisions on animal welfare policy should be made by an independent and impartial authority, rather than Departments of Agriculture. Similar concerns were echoed in research commissioned by the federal Department of Agriculture in 2018 (Futureye, Australia's Shifting Mindset on Farm Animal Welfare, 2018).

The same research highlighted public concerns about perceived conflicting interests when the regulatory body responsible for the promotion of the agricultural industry is also tasked with ensuring animal welfare standards (Futureye, Australia's Shifting Mindset on Farm Animal Welfare, 2018, p.16).

A significant challenge to Australia's animal welfare system is the disconnection between public expectations regarding animal welfare governance and what the current system offers. Continuation of this disconnect will lead to eroding public confidence and growing distrust in the system. It is noteworthy that countries with more independent governance frameworks than Australia, where independent expert advice and decision making play a formal role, have more advanced animal welfare standards.

Questions 6 & 7. What do you think are the biggest opportunities for Australia's animal welfare system?

The most promising opportunity for Australia's animal welfare system lies in the establishment of a national Animal Welfare Commission, as recommended by the Productivity Commission in 2016 (see *Regulation of Australian Agriculture*, Inquiry Report No.79, Ch.5). The need for a new national animal welfare body was also

highlighted in the 2022 *Review of the Independent Poultry Welfare Panel* commissioned by the Department of Agriculture. The Review identified several benefits of such a body, including its:

- · Clear independence from political and stakeholder interests
- · Access to relevant expertise through the appointment of suitably qualified personnel
- Ability to adopt an objective issues prioritisation framework
- Capacity to undertake or commission research to address identified gaps in knowledge
- Responsibility to track and report on state progress regarding standards implementation
- Obligation to publicly report on collective state and territory compliance and enforcement activity
- Potential to assist industry and government in avoiding future costs associated with loss of social licence.

Question 8. Is there anything else you would like to be considered in the development of the strategy?

Working in animal industries, such as abattoirs and research facilities that use animals, is often taxing both emotionally and physically. These industries can lead to high rates of occupational injuries and significant emotional distress among workers. The Australian government is uniquely positioned to support these workers in transitioning to sustainable industries that do not compromise the well-being of animals, the environment, or the workers themselves. By facilitating this transition, the government can promote a future that prioritises ethical treatment of animals, environmental sustainability, and the health and safety of its workforce.

It is crucial to acknowledge that all animals, humans included, are interdependent. Our laws often privilege our own species while failing to extend the same considerations to others, a bias known as speciesism. This discrimination against other species enables a range of harms that would be considered criminal if committed against our own species. It is important to name and tackle this issue of speciesism, much like we have done with racism and sexism, to bring it into our social discourse in a meaningful way.

Another important term to introduce into the conversation is theriocide, which refers to the killing of non-human animals, whether legal or illegal, ethical or unethical. Since first appearing in academic discourse in 2014, the concept of theriocide has become increasingly relevant. Addressing theriocide requires a multifaceted approach that involves legal action, ethical considerations, conservation efforts, and public engagement. It is a critical issue for maintaining ecological balance and ensuring the well-being of all species on Earth. To this end, it would behoove the government to begin

using terms such as theriocide and speciesism if we are to have meaningful and contemporary discussions about animal welfare going forward.

Finally, chthonic First Nations law, which embodies the ancient, inherent relationship between humans, other species and the natural world, offers invaluable insights into sustainable and ethical animal stewardship. Integrating First Nations principles of reciprocity and interconnectedness into Australia's animal welfare strategy can help ensure that policies are not only respectful of animal sentience but also aligned with the ecological wisdom and traditions of the land's original custodians.

We look forward to seeing these considerations reflected in the renewed AAWS. Thank you for this opportunity to contribute to the shaping of Australia's future approach to animal welfare.

Sincerely yours,

Dr Tamasin Ramsay

President

GABA (Gariwerd Animal Biodiversity Alliance)