



Inquiry into the Inspector-General of Live Animal Exports Amendment (Animal Welfare) Bill 2023

Brief submission of the
Australian Veterinary Association Ltd

11 August 2023

The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry, research and teaching. Veterinary students are also members of the Association.

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In the AVA's [previous submission](#) (March 2023), we expressed our support for strengthening of the current live animal export regulatory framework, as well as independent oversight of this, given the risks to animal welfare inherent in the trade.

Our key recommendations for the role of the office of the Inspector-General of Animal Welfare and Live Animal Exports (IGAWLAE) were:

- Reporting must move away from a focus on mortality – this is a crude measure that reflects the ‘tip of the iceberg’ – to a focus on measures that reflect the welfare of the animal (morbidity). Notifiable Events should be triggered by a certain level of morbidity, not just mortality;
- There should be standardised and consistent reporting of all morbidity on every voyage, and this must be made available to the parliament and public in a transparent manner. This should include the extent to which monitoring and investigation by the Department results in tangible changes and mitigation of risks for future voyages;
- The office of the IGAWLAE should prioritise high risk issues: e.g. long-haul voyages, journeys into the northern hemisphere summer, mortalities and conditions at destinations, slaughter standards at destinations;
- Staff in the office of the IGAWLAE should be wholly independent and have capabilities in veterinary science, animal welfare science and epidemiology;
- The work of the IGAWLAE office should also include assessing alternatives to live export for high-risk routes and destinations, and the development of effective cold chain facilities to facilitate the chilled and frozen meat export trade.

Please refer to our [previous submission](#) (March 2023) for further detail on the above.

For this brief submission, given the short timeline for input, we wish to expand on our previous comments relating to the restricted scope of the proposed role, and our vision for a broader independent body for national animal welfare coordination and oversight.

The proposed role of IGAWLAE as it currently stands, although slightly expanded, does not appear to extend beyond aspects of live animal export.

We feel this is a missed opportunity for creation of a broader independent office or commission which would provide federal leadership of states and territories, and coordinate national animal



welfare policy reform for all animals, not just those undergoing live export. The AVA has long championed this concept, and supported the 2017 Productivity Commission¹ recommendation for establishment of an 'Australian Commission for Animal Welfare' along these lines.

While we welcome the current government's commitment to reinstating a renewed Australian Animal Welfare Strategy (AAWS), we don't see this as replacing the need for an independent body or office; rather, the development and oversight of an AAWS would be one of many functions of an independent office or commission. Other functions would include oversight of animal welfare regulation and enforcement by the states and territories, with a view to national harmonisation, and leadership in the development of the Australian Animal Welfare Standards and Guidelines, which to date has been problematic.

The AVA has been a participant in the Animal Welfare Standards and Guidelines process since their inception, and strongly supports the development of enforceable standards which bring about sustainable animal welfare improvements. However, we have consistently stated our concerns about: lack of progress, lack of consistent implementation across jurisdictions, and a major flaw in that frequently the science has been overlooked in the development of these standards, in favour of the status quo. There has been an inability to enact change, or incorporate new research and technology, when this will involve costs or practical imposts on industry. This often results in minimal change, and standard setting which represents current practice only, rather than achieving tangible improvements in animal welfare outcomes.

In this way Australia is falling behind other developed countries – we have been slower than many countries in implementing animal welfare reforms (eg exit from conventional layer cages, sow stalls, and approaches to painful husbandry procedures.)

It is important that we have national animal welfare oversight by an impartial body which ensures that the science-base and RIS process used to establish the standards is independent of other interests, so that the standards result in meaningful change.

In summary, the AVA recommends expansion of the functions of the IGAWLAE to a much wider remit, along the lines of the Productivity Commission's recommendation for the establishment of an 'Australian Commission for Animal Welfare' - to coordinate national animal welfare policy and standards development, and to publicly assess the effectiveness of state and territory implementation and enforcement. We feel this is urgently needed to address many of the deficiencies in Australia's current animal welfare framework.

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¹ <https://www.pc.gov.au/inquiries/completed/agriculture/report>