



Animal-Free  
Science  
Advocacy

ANIMALFREESCIENCEADVOCACY.ORG.AU

15 May 2024

Dear Australian Government,

**Re: Australian Animal Welfare Strategy Discussion Paper**

I am writing this submission on behalf of Animal-Free Science Advocacy (AFSA), an organisation that is committed to replacing animals in research and teaching. Having been deeply disappointed when the previous Australian Animal Welfare Strategy (AAWS) resourcing came to an end, I am pleased to see that the government is now partly addressing this issue.

**General comments**

Over the past decade, Australia has lacked a clear national direction on animal welfare. The creation of a new Animal Welfare Strategy presents a unique opportunity for us to plan for the future and establish a modern, effective animal welfare system that benefits both people and animals. This is a critical endeavour that needs to be appropriately resourced and oriented towards achieving tangible improvements in animal welfare.


However, I am concerned about the three-year timeline proposed for the renewal of the AAWS. This appears excessively prolonged, and I struggle to understand why the various chapters could not be developed simultaneously. Given the potential for substantial overlap and common issues, it would be more efficient to work on these areas in parallel. I urge the Australian Government to increase the funding for this renewal process so that a new AAWS can be finalised within a more reasonable timeframe.

In regard to the animals used in research and teaching workstream, much of the materials prepared for the previous AAWS strategy are still relevant with some minor updates only required, for example, the Review of Current Practices and Needs to Inform Public Presentation of Animal Usage for Scientific Purposes in Australia. The recommendations from this Review have not been implemented and it still serves as useful background which does not need to be entirely repeated.

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

The current proposed vision does not mention the crucial aspect of improving and protecting animal welfare, which should be a fundamental part of any animal welfare strategy. It is essential that the AAWS vision includes improved animal welfare as a primary outcome. 'Valuing' the welfare of animals is very different from protection the welfare of animals. Additionally, I would like to suggest that a 'harmonised and nationally consistent' animal welfare system should be the vision to aspire to.

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The previous version of the AAWS (2010-14) outlined a series of goals, objectives, outcomes, benefits, and indicators of success that could serve as the foundation for the renewed strategy. Instead of starting from scratch, the renewed AAWS should build upon what was previously established, guided by up-to-date scientific knowledge and societal expectations.

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

I propose that the Research and Development work stream should receive ample government funding, supporting independent research and unencumbered by industry funding. I am not clear what the term 'extension activities' refers to.

The Reporting and Compliance work stream is crucial to the proper functioning of the AAWS, ensuring that states and territories implement nationally agreed standards consistently and promptly. All these work streams are indispensable to the efficient operation of the AAWS.

It is not clear where animal welfare policy fits within the proposed streams.

International engagement- suggest it is not showcasing Australia's national approach more so than learning from other jurisdictions.

**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.**

Long-term shifts in public attitudes, values, and beliefs about animals will impact all animal sectors. The AAWS should incorporate mechanisms for monitoring and tracking these trends, ensuring that Australia's approach to animal welfare remains relevant and aligns with public values and expectations. For example, the funding of a national opinion poll on the use of animals in research and teaching, as the UK Government has committed to funding.


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

The lack of independent governance is the most significant challenge facing Australia's animal welfare system. Currently, the responsibility for overseeing Australia's animal welfare strategy, policy, and standards falls to ministries and departments of agriculture, resulting in a conflict of interest, as these entities primarily serve Australia's agriculture industries. In terms of the animal research industry, there are also potential conflicts of interest with Departments of Agriculture or Environment approving their own research/investigating non-compliance of their own research and serving to support rather than govern animal research.

The absence of independent governance not only adversely affects animal welfare but also undermines democratic principles by obstructing the public's will. Recent research has shown that the majority of Australians believe that all sentient animals should be guaranteed good welfare by

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law and that an independent and impartial authority should decide on animal welfare policy decisions.

There is a significant gap between the community's expectations for animal welfare governance and what the current system offers. Allowing this gap to persist could lead to a loss of public trust and confidence in the system. Countries with more independent governance frameworks, where independent expert advice and decision-making play a formal role, have generally more advanced animal welfare standards.

Finally, a lack of prioritisation placed upon animal welfare is a key challenge and not in line with the community expectations as per the above.

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

The establishment of a national Animal Welfare Commission, as recommended by the Productivity Commission in 2016, would greatly benefit Australia's animal welfare system.


If a national Animal Welfare Commission cannot be established, the AAWS should ensure independence and transparency in its governance arrangements and processes. This could be achieved by creating an independent, expert-based advisory council to oversee the implementation of the strategy and by publicly reporting on activities and implementation progress.


Thank you for the opportunity to make a submission and I can be contacted to discuss any of the above feedback in more details.

Regards,

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