

24<sup>th</sup> September 2019

## **Prevention of Cruelty to Animals Draft 2019 – Victoria**

Review conducted by the Department of Jobs, Precincts & Regions of Victoria.

Animal Care Australia is a new national incorporated association representing the interests of all animal hobbyists established to lobby for real animal welfare. ACA brings together representatives from a broad range of pet & companion animal groups, recognising we are the real animal welfare experts - those who keep, care for and breed animals.

In reference to the proposed regulations relating to the 'General requirements' Animal Care Australia (ACA) agrees with the proposals. We find the best interests of animal welfare are set out with a reasonable standard being adopted. ACA supports welfare standards that have the best interests of the animal and are reasonable to achieve by owners. However, Reg 6(2) would be better worded to "ensure the temperature within the vehicle does not exceed a temperature causing the animal heat stress for a prolonged period."

In relation to 'Pain relief for mulesing of sheep' ACA acknowledges there are circumstances where mulesing is required to ensure sound animal welfare outcomes are achieved therefore the animals should receive appropriate pain relief during and following the procedure.

ACA supports the 'Fruit netting' provisions. With the ever increasing problem of land clearing more of our native wildlife is being forced into suburbia and with that finding themselves entangled within fruit-netting. Ensuring the colour of netting making it visible and educating the public on the correct manner in which the netting is installed is also significant. This should reduce the number of species finding themselves caught.

The use of 'Electronic Devices' raises concerns for ACA.

ACA acknowledges our expertise is limited with this subject matter, however we are not comfortable with this being so strongly regulated, it reads as over regulation. There are better ways using education of appropriate use rather than regulation. In addition, while not directly specified within Regulation 18 (d) "regulated pest animals or controlled pest animals, if the use or placement of the electric prodder on those animals has been approved by a veterinary practitioner". ACA would like to see the written exclusion of horses that have been declared as pests. Horses are flight animals, very sensitive to stimulus, and over reactive to sudden surprises resulting in increased danger to workers and other people coming into contact with that animal. Also reduces the likelihood that the individual horse can be safely handled in future, which could result in a poorer welfare outcome for the animal.

ACA would like to see the exclusion of electronic devices, in particular electronic prodders used on 'prey' animals given these devices are traumatising to the animals - which raises welfare concerns.

The proposed regulations relating to 'Traps' again raises some concerns for ACA. The majority of clauses in this Regulation appear to have best interests of animal welfare set out with a

reasonable standard adopted. However, we note the absence of banning traps commonly known as 'opera house' nets. We are seeking an amendment to 46 with the inclusion of: c) prohibiting the use of 'opera house' traps and only using platypus and native aquatic species friendly nets and traps.

With a focus on pets & companion animals ACA does not have a direct interest in the proposed regulations relating to 'Rodeos' or 'Scientific Procedures', however, animal welfare will remain a primary concern. ACA supports welfare standards that have the best interests of the animal and are reasonable to achieve by owners.

On behalf of the Animal Care Australia Committee,

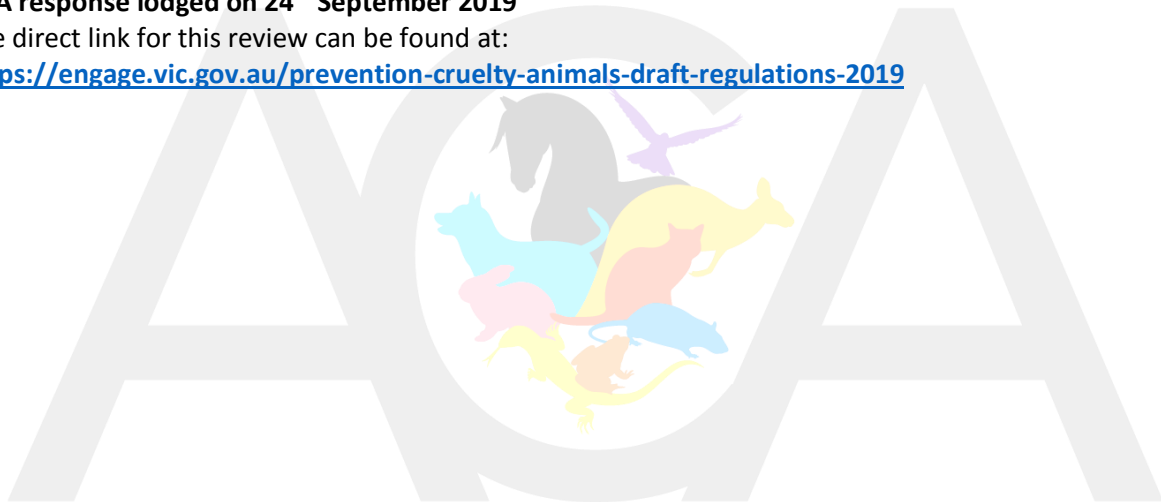


Michael Donnelly  
President,  
Animal Care Australia.

**ACA response lodged on 24<sup>th</sup> September 2019**

The direct link for this review can be found at:

<https://engage.vic.gov.au/prevention-cruelty-animals-draft-regulations-2019>





“Animal welfare by the experts—those who keep, care for and breed animals”

### **Mission Statement**

Animal Care Australia (ACA) is the peak body advocating higher welfare standards for keeping animals in Australia as pets and companions.

ACA provides continued development of animal welfare standards and Codes of Ethics for animal husbandry, breeding, training, sale and sporting exhibitions for a wide range of animal species. This is to promote and encourage high standards in all interactions with animals in our care.

ACA also provides education to our members, the general public and government to encourage responsible pet ownership, and the respectful treatment of all animals in our community.

### **Objects**

- To represent animal groups as the peak animal welfare body.
- To engage Government on all levels of animal welfare issues.
- To provide expert animal welfare advice to legislators.
- To clarify the difference between animal rights and animal welfare.
- To promote higher animal welfare outcomes.
- To support grass roots hobbyists/animal keepers.
- To develop strategies and educate the general public in the best care for all animals.