

31<sup>st</sup> October 2019

Animal Welfare  
NSW Department of Primary Industries | Biosecurity and Food Safety

Dear Kim

**RE: Draft Research Animal Rehoming Guidelines**

Animal Care Australia (ACA) is a national incorporated association representing the interests of all animal hobbyists, keepers and breeders, 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 how effective the Guidelines will be in supporting research establishments, individuals and rehoming facilities to rehome animals after their use in research, ACA believes the draft guidelines will be effective in supporting establishments, individuals, as well as re-homing facilities to re-home animals after their use in research.

We recommend researchers consider rehoming during the planning stages so that animal husbandry throughout the research project prepares animals in advance.

When rehoming is a likely option then rehoming organisations such as animal keepers associations should be forewarned so they can prepare.

Animals used for exhibition and display play a pivotal role in education and creating awareness.

It is acknowledged that some animals cannot be rehomed as pets however these animals may be better suited to be homed in an exhibition or display environment where they can live and be cared for ethically as well as providing an ongoing educational benefit. The EAPA (Exhibited Animals Protection Act) provides the appropriate regulations to ensure their ongoing welfare needs are met.

The draft guidelines are easy to follow however we recommend the 'definitions' be placed at the beginning of the document. This makes it easier for cross-referencing and allows users to obtain a general understanding of the terminologies prior to commencing the document.

The numbering system used requires attention to simplify future referencing. It would be better to fully number individual points within the document, for example Part 3 4. Health 2) (a) numbered as 3.4.2(a).

ACA notes there are potential issues in being able to meet these Guidelines. We would like to see requirements implemented to ensure the behaviour assessments are completed by individuals skilled with the understanding of and knowledge of the particular individual species of animal which are being assessed. Assurances need to be provided that the assessors have an intimate knowledge of the criteria used as part of the assessment process. This should include expert knowledge of individual species natural behaviour in all aspects, including breed specific behavioural traits of each species.

Behaviour assessments that have been left to some rescue organisations, have to date utilised unrealistic "behaviour testing" methods which in themselves may cause psychological trauma ultimately resulting in the animals requiring to be euthanased.

ACA has several recommendations to improve the Draft guidelines.

1. As stated above – the Definitions section should appear at the beginning of the document and the numbering system should be revised to improve future referencing.

2. Ensuring appropriate mechanisms to ensure a blanket rehabilitation and behaviour assessment method for all re-homing organisations involved is introduced and assessed by the Department of Primary Industries.
3. Assessment methods that do not inflict psychological harm on the animals and the animals are evaluated according to their species and breed specific behaviour traits are a necessary requirement – which is NOT currently being met by all rescue organisations.
4. In reference to Part 2, 1. Responsibilities 8) and 3.2 1. a definition of ‘habituation’ and ‘training’ is necessary. Those terms need to be clearly defined rather than simply stated as the definition of each word means different things to different people.

Alternatively those topics could be rephrased to include: ‘The use of positive reinforcement for fear free habituation and training is recommended’.

(Resources can be found here: <https://fearfreepets.com/>)

5. Some specific edits...
  - Part 2 1(12) p9 – replace “rehome native animals following advice from” with the words “rehome licensed native species following advice from....”. This edit better reflects the requirements of the Biodiversity Conservation Act 2016.
  - Part 2 3.2 p12 – insert the following as 1) “There should be a presumption that animals will be rehomed therefore socialisation, habituation and training should occur, where possible, in parallel with research activities.”
  - Part 2 3.4 1) (a) p12 – append “or animal keeper association.”
  - Part 3 1.p13 – insert point 3) as follows “Research Establishment staff should consider animals likely to be rehomed at the research planning stage. Husbandry throughout the research project should aim to prepare animals for rehoming.
  - Part 3 2 p14 – insert point 6) as follows “Contact rehoming or animal keeper associations well in advance of the animals becoming available for rehoming.”
  - Part 3 6) (e) – append “unless DPI approval can be negotiated with the rehoming recipient.” Note that for birds the prohibited list is species not known to be present in Australia, therefore relisting and then rehoming can realistically occur.
  - Insert “animal keeper association” into each occurrence of possible rehoming organisations within the following sections – Part 4 1 1), 3), 6) and Part 4 5 2).
  - Part 3 5 4) – Replace the word “address” with the word “consider”. A number of the listed points do not apply or are impractical for many animal species.

We look forward to further contribution and consultation.

Kind regards,



Michael Donnelly  
President.



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

### **Mission Statement**

Animal Care Australia (ACA) is the Peak Animal Welfare Body representing the keepers and breeders of animals in Australia as pets and companions.

### **Objects**

- To represent Animal Care Groups as the peak animal welfare body
- To engage and advise Government and legislators on welfare issues relating to pets and companion animals.
- To protect the rights of ethical hobbyists & animal keepers to breed and keep pets and companion animals.
- To clarify the difference between animal rights and animal welfare
- To promote higher Animal welfare outcomes