

4th October 2022

Department of Jobs, Precincts and Regions (DJPR)

RE: Reforming Victoria’s Biosecurity Legislation Discussion Paper, August 2022

Animal Care Australia (ACA) is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

As a nationally recognised animal welfare organisation the majority of the reforms outlined within the discussion paper remain outside of our purview, however, we provide the following feedback.

1. ACA supports the objectives of the Biosecurity Legislation Reform in Victoria.
Consolidating multiple Acts into one will simplify and clarify expectations of community and industry to meet biosecurity standards.
2. ACA supports the amendments to Victoria’s Livestock Management Act 2010 to counter the biosecurity risks of animal rights activism on Victorian agriculture, petting farms and equestrian facilities.
3. ACA notes the absence of Animal Welfare throughout the discussion paper.
ACA acknowledges that Animal Welfare is outside of the scope of this reform, but the lack of recognition of the importance of ensuring good animal welfare standards are met while complying with biosecurity legislation is concerning to us.

While preventing or addressing a biosecurity emergency, animal welfare must and can be maintained. This must be recognised in the reforms, and the new standards and regulations must ensure good animal welfare at all times, not least when animals must be quarantined or destroyed.

4. The preface of “**Reform is an opportunity to:**” (page 3) point number 10 states:

“Better meet business and community expectations regarding transparency, decision-making, and human and animal rights”.

ACA recommends this point should have stated:

“Better meet business and community expectations regarding transparency, decision-making, human rights and animal welfare.”

Animal Rights is not Animal Welfare, has no relationship to Animal Welfare Science nor Animal Ethics, and as such, has no place in legislation.

Animal Rights is an extreme philosophical position held by less than 1% of the Australian population and is clearly not a ‘business or community expectation’. Animal Welfare is objective measurable standards to ensure the proper care and handling of animals in life and in death. Good Animal Welfare absolutely IS an expectation of almost every Australian, and supported by all responsible animal owners, whether commercially or domestically. Ensuring Animal Welfare is maintained during all aspects of a Biosecurity emergency and prevention measures is of high priority to ACA and particularly our Horse & Livestock members.

We feel that Animal Welfare should be acknowledged and high standards legislated within the Biosecurity Act, irrespective of the regulations and compliance potentially remaining outside of this reform.

We thank you for the opportunity to provide feedback. Please do not hesitate to make contact if we can assist further.

Kind regards,



Michael Donnelly
President
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