

6th October 2023

Racing Regulations Consultation
Department of Natural Resources and Environment Tasmania
E: RacingRegulationsConsultation@nre.tas.gov.au

RE: Public Submission on draft Racing Regulation and Integrity Bill

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.

Animal Care Australia strives to educate and clarify the differences between animal welfare and animal rights. The latter has no place in legislation or policy management with the keeping of pets, companion animals, animals used for educational/entertainment purposes or kept for conservation.

Animal Care Australia commends the government on its review of the racing regulations Act 2004, and the use of an independent expert in this process.

In relation to the recommendations put forward by Mr Montheith:

1. **Animal Care Australia agrees with creating a Tasmanian Racing Integrity Commissioner role which would bring Tasmanian Racing into alignment with other states such as Victoria and New South Wales.**
2. **Animal Care Australia agrees with the enhancement of Integrity Governance and the responsibility of the codes of racing as well as race management and daily animal welfare falling under this enhancement.**
3. **Animal Care Australia strongly supports the inclusion of a welfare position on the Integrity and Animal Welfare Advisory Committee, we strongly oppose the RSPCA TAS holding this position.**

Animal Care Australia notes there are separate proposed points of this Bill that exceed the scope of animal welfare and accordingly we are only responding to the relevant animal welfare sections – those being Division 6 – Integrity and Animal Welfare Standards and PART 3 – Integrity and Animal Welfare Advisory Committee.

In response to ‘**How will Animal Welfare Be Improved**’¹

- *The new Tasmanian Racing Integrity Commissioner will be able to set industry-specific Standards around animal welfare and monitor their implementation.*

Animal Care Australia strongly recommends any review or implementation of Standards MUST be consulted with key stakeholders in order to ensure current methodology and recommendations requirements are founded in animal welfare science and not based on ideological views.

- *RSPCA Tasmania is proposed to have a new advisory role, as a permanent member of a committee advising the Tasmanian Racing Integrity Commissioner on animal welfare matters.*

Animal Care Australia STRONGLY OPPOSES this proposal. The RSPCA do not fit the criteria for what is required of this position. The RSPCA are not an animal welfare organisation – they are an enforcement and shelter organisation. This position should be filled by an individual or organisation that has in-depth knowledge and experience of animal welfare requirements of the species within the racing industry, such as a representative/s from the veterinary industry. Animal Care Australia also highlights the campaigns currently perpetrated by RSPCA bodies in other states calling for and supporting the banning of greyhound racing and as such we feel the RSPCA’s presence on the Committee is a conflict of interest. The RSPCA’s relationship with racing in Tasmania should be in

¹ [How Will Animal Welfare Be Improved](#)

line with other states where the RSPCA are used as external stakeholders who are consulted as required for investigative purposes, but do not have input into decision-making processes.

- *No operational aspects of RSPCA Tasmania activities will change. They will continue to have the power to conduct independent investigations of animal welfare matters (for any species of animal, including those involved in racing) under the Animal Welfare Act 1993.*

While Animal Care Australia does support this recommendation we request the Tasmanian Government also establishes a regular Parliamentary Inquiry into the effectiveness of the RSPCA as an enforcement agency and the ethics of a charitable organisation carrying out an enforcement role for the government. Similar Inquiries have been established in other states in order to ensure accountability and transparency of the charitable organisation.

- *Tasracing will be responsible for implementing, monitoring and coordinating compliance with standards, including training of people to those Standards.*

Animal Care Australia supports this proposal, and recommends a greater emphasis on the rehabilitation and re-training of greyhounds for the purpose of re-homing is incorporated within the training of animal owners within the industry. Additionally, Animal Care Australia would like to see improvements to the training of assessors, owners and all training programs as these are necessary to remove outdated and inappropriate methods.

- *The Office of the Tasmanian Racing Integrity Commissioner will have staff who have animal welfare and regulatory experience.*

Animal Care Australia supports this proposal – again with the same caveat as above – that an appropriate individual or organisation with the skillset and acute knowledge of animal welfare science is employed to his position. We re-iterate, this is not a representative from the RSPCA.

Our position is supported by the testimony provided by Mr Steve Coleman – CEO RSPCA NSW at the Parliamentary Inquiry into Animal Cruelty Laws in NSW, in February 2020 - while responding to a question regarding the ability of the RSPCA to remain independent. He stated:

“ ... I think I have ventilated this in different quarters over the years. There is an argument that we should receive no funding from government in order to be completely independent.”²

Please do not hesitate to make contact if we can assist you further in the development of this important Bill.

Kind regards,



Michael Donnelly
President
0400 323 843

² [Testimony Transcript](#)

About Animal Care Australia

As a nationally recognised animal welfare organisation, ACA encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

ACA was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare. We estimate our foundation ACA clubs currently represent well over 150,000 members and that is just in NSW alone!

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- lobbying government for stronger welfare outcomes
- lobbying government to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights