

4th September 2025

Tara Cheyne MLA
Minister for City & Government services
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Concerns with the ACT Animal Welfare Advisory Committee and Codes of Practice for animal welfare in the ACT

Animal Care Australia 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 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, companion animals, animals used for educational or entertainment purposes or kept for conservation.

As the Minister is aware Animal Care Australia has continually raised concerns relating to the lack of appropriate consultation for amendments to animal welfare legislation and related Codes of Practice. We would like to take this opportunity to thank Minister Cheyne for responding to our request to be included as a key stakeholder for all animal related consultations.

It is a shame that the previous requests sent to Minister Steel were not followed through either by the respective department or by the Animal Welfare Advisory Committee (AWAC).

Animal Care Australia has major concerns with the level of animal rights ideology that has infiltrated the ACT's animal welfare Act and Codes of Practice.

In October 2024, Animal Care Australia reviewed documents provided to us via a Freedom of Information (FOI) request (Freedom of Information Request - Reference 24-114). Requested were copies of Minutes from AWAC meeting extending between 1st January 2022 and 1st August 2024, including copies of all submissions provided to any consultation completed during the updating of the following Codes of Practice:

- 1) Animal Welfare (Welfare of Horses in the ACT) Mandatory Code of Practice 2024.
- 2) Animal Welfare (Keeping and Breeding of Ferrets in the ACT) Mandatory Code of Practice 2024.
- 3) Animal Welfare (Keeping and Breeding of Guinea Pigs in the ACT) Mandatory Code of Practice 2024
- 4) Animal Welfare (Keeping and Breeding of Rabbits in the ACT) Mandatory Code of Practice 2024
- 5) Animal Welfare (Keeping and Breeding of Rats and Mice in the ACT) Mandatory Code of Practice 2024

Briefly, the Minutes highlight a constant occurrence of ideological and biased opinions wanting to be implemented into the Reviews of all of the above Codes of Practice, in particular the Code relating to the Welfare of Horses.

Animal Care Australia is in the process of developing a full response to each of the above Codes and will send that through to you once completed.

Another concern is that members of the AWAC are tasked to provide reviews of the Codes, rather than the method used in other States whereby a consultation of the 'existing' code is completed by key and relevant stakeholders. This is then assessed by the department, and a public consultation is then sought, with AWAC's providing input before and after the public consultations. The fact the ACT AWAC is reviewing, drafting, then reviewing and finalising any Code of Practice is not only questionable but is equally apparent when assessing the finalised versions of the drafts.

Animal Care Australia notes the continued preference of the AWAC ACT to only permit veterinarians to complete a procedure or provide treatment/care over other qualified professionals is repeated throughout all of the Codes and is strongly prevalent in the latest Code of Practice for the Welfare Dogs.

AWAC Structure mid 2024

Ms Genevieve Butler - Chair and Chairperson of the International Air Services Commission

Ms Michelle Robertson – CEO RSPCA ACT

Dr Melanie Latter - Australian Veterinary Association

Mr John Starr - ACT Rural Lessees Association (farming representative)

Ms Margaret Peachey – ACT Wildlife

Ms Judith Woolley – DOGS Australia

Mr Wayne Slattery - equestrian and competition show jumper, farrier, and horse trainer.

Dr Stephanie Pulsford – Ecologist at Environment, Planning & Sustainable Development Directorate (an ACT Govt Department)

Dr Serrin Rutledge-Prior - PhD of Philosophy. Theses: how to better include nonhuman animals within the scope of legal justice. Animal Defenders Office.

Dr Kyeelee Driver – a veterinarian – Acting Chief Veterinary Officer

9 Committee members (excl Chair). 2 veterinarians, 1 RSPCA, 1 farmer, 1 wildlife, 1 companion animals and 1 horse, 1 philosopher and 1 Govt employee.

Note: RSPCA is governed by animal rights ideology policies developed by RSPCA Aust. Australian Veterinary Association is also led by animal rights policy – are all of the vets seated on this AWAC members of the AVA? Animal Defenders Office defends the rights of animals.

Animal Care Australia also notes Ms Judith Wooley the representative from DOGS Australia was replaced by Dr Hayden Montgomery – yet another veterinarian. This occurred in March 2025, at a time when the draft Code of Practice for the Welfare of Dogs was being finalised.

It is not lost on Animal Care Australia that a replacement from the same organisation or similar representation ie a dog or cat member association was not appointed, especially at a time when a relevant Code of Practice is to be reviewed and assented.

Animal Care Australia is not surprised by the ideological infiltration into the current Code of Practice (and previous ACT-based Codes of Practice) given the level of empowerment provided to the Animal Welfare Advisory Committee ¹, which is different to how other states and territories utilise their AWAC's.

Animal Care Australia notes of the 11 current committee members (updated since mid-2024) only 1 represent actual animal owners – 1 horse trainer/owner. While there are 4 veterinarians, an animal

¹ [ACT AWAC](#)

law representative and a person representing land/rural leasing. 1 native wildlife rescuer and 1 representing the Nature Conservation Act.

In addition, there is an RSPCA representative, while the 'AWAC Chair' is actually the Chair of the International Air Services Commission – a person as far independent of animal care as you could likely get – therefore in our opinion unable to ascertain what advice or opinions being expressed are in the animals' best interest. As such, is more likely to conclude the RSPCA and AVA opinions are correct or more legitimate over those of 'a horse trainer/owner'. Most importantly it is common knowledge that the RSPCA and Australian Veterinary Association are more ideologically policy driven, meaning at least 5 of the 10 (excl Chair) are ideologically driven. This raises an even greater concern about what occurs in order to achieve a quorum. The numbers are simply in favour of the veterinarians (all registered AVA members?) on Committee.

The Code of Practice continues to state it is based around the 5 domains (1) Nutrition, (2) Environment, (3) Health, (4) Behaviour, and (5) Mental state. While Animal Care Australia supports following the 5 domains for the purpose of ensuring the animal welfare outcomes and needs of the animals are being met, HOWEVER, the very structure of this AWAC defies the ability of assessing how those needs are met and therefore are justified.²

Published studies have specified **the need for diverse and non-scientific backgrounds for panel members**: *“there would be merit in engaging panels or consultative networks with wide expertise and experience”* (Mellor & Beausoleil 2015). Mellor et al. (2020) state that *“Any assumption of the occurrence of negative affects must be supported by directly observed animal-based physical, physiological, clinical and/or behavioural evidence”*. The same authors go on to say, *“This is equally the case for the presence of opportunities for animals to engage in rewarding behaviours.”* Clearly, there must be evidence, usually behavioural, that any such opportunities are actually used before their potential welfare-enhancing impacts could be considered. Only then can inferences be made about any aligned negative or positive effects. Finally, Mellor et al. (2020) posit that *“This emphasises the general point that objective animal-based evidence (Domains 1 to 4) must form the foundations of any inferences about welfare-relevant affects (Domain 5).”*

The assessments generated from the Five Domains model are derived through the use of panels and suffer from the problems inherent to the use of expert opinion or 'eminence' (Hampton et al. 2016b). This is of particular concern for contexts in which there are gaps in scientific understanding, and model outputs may thereby fail to be evidence-based (Baker et al. 2016).

This is true and evident in the flaws and inclusion of ideological concepts included in this draft Code of Practice and previously assented Codes:

- Animal Welfare (Welfare of Horses in the ACT) Mandatory Code of Practice 2024
- Animal Welfare (Keeping and Breeding of Ferrets in the ACT) Mandatory Code of Practice 2024
- Animal Welfare (Keeping and Breeding of Guinea Pigs in the ACT) Mandatory Code of Practice 2024
- Animal Welfare (Keeping and Breeding of Rabbits in the ACT) Mandatory Code of Practice 2024
- Animal Welfare (Keeping and Breeding of Rats and Mice in the ACT) Mandatory Code of Practice 2024

Remembering the Five Domains Model of animal welfare was developed by Professor David Mellor and Dr. Cam Reid, as a framework for assessing animal welfare, building upon the Five Freedoms, that Mellor is included and quoted in all of the studies cited above.

Minister, please refer to our official response to the current Code of Practice for the Welfare of Dogs. Animal Care Australia strongly urges you to NOT progress this Code of Practice without

² [National Library of Medicine](#)

having met with and properly consulted the key stakeholders that this Code will affect.

Most of these stakeholders are members of Animal Care Australia and include, The Professional Dog Trainers of Australia, Master Dog Breeders & Associates, and our Dog Representative is a member of Dogs Australia and is a trainer at the Pet Industry College (a nationally recognised RTO). We can bring all of their knowledge and first-hand experience to any and all consultations including providing direct advice to yourself or your staff.

Animal Care Australia is requesting the opportunity to meet with you and further discuss this important matter.

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive style with a large, stylized 'M' and a long, sweeping underline.

Michael Donnelly
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About Animal Care Australia

As a nationally recognised animal welfare organisation, Animal Care Australia 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.

Animal Care Australia 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.

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:

- advocating for stronger welfare outcomes
- advocating 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