19th November, 2026

The AAWS project team
Department of Agriculture, Fisheries & Forestry
E: aaws@aff.gov.au

Lodged via online portal

Re: Working Draft – Australian Animal Welfare Strategy

Have Your Say consultation draft

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.

Animal Care Australia supports the development of a national Animal Welfare Strategy but is disappointed by the lack of ambition, clear direction and meaningful reform in the current draft. Instead, this Strategy largely describes existing arrangements without addressing their shortcomings. With no requirement for States and Territories to adopt it, Animal Care Australia questions its capacity to deliver meaningful improvements.

Animal Care Australia believes improving animal welfare norms throughout the population is the most effective way to achieve lasting improvements. This requires sustained investment in practical, evidence-based education and compliance actions delivered through a broad range of channels. Current initiatives are limited in scope and reach. Education should promote responsible animal care, informed decision-making and the prevention of avoidable welfare problems.

It is time for governments to take responsibility for animal welfare policy, administration and enforcement rather than relying on charitable organisations. Decisions must be informed by independent science and the practical expertise of those who study, work with, breed and keep animals. Animal Care Australia advocates for an independent Animal Welfare Commission in each State and Territory to provide oversight and accountability.

Ultimately, Animal Care Australia considers this Strategy a significant missed opportunity - there is little for States and Territories to implement. Animal Care Australia fears the Strategy will become little more than a polished policy document, with limited impact on animal welfare outcomes across Australia.

Clarification:

Before providing feedback on this Final Strategy, Animal Care Australia would like to highlight that we have found this entire consultation process to be discombobulated.

At the beginning, we were informed that stakeholders that had relevance in each of the different Chapters would be consulted on each step of the process – that did not happen.

At the announcement of this consultation, the online Have Your Say webpage clearly stated there was a 1500 word limit to responses – and yet when we pressed and questioned this, we were informed that was not the case and that submissions were not going to be word count checked.

It is clear to us, that well-meaning intentions to avoid rambling contributions has been inaccurately perpetrated, and this has led to private stakeholder holding their own meetings, and stakeholders finding it necessary to reach out for further clarification.

To be assured that our feedback is received and reviewed in its entirety, Animal Care Australia will be submitting this to Project Team (via the online portal) and publishing all consultation submissions publicly on our website.

Feedback to the Working Draft Strategy:

Please refer to the submission below this cover letter.

Should you require further details please do not hesitate to reach out as we would be happy to meet with you, and further discuss this matter.

Kind regards,



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An Animal Care Australia submission

Working Draft – Australian Animal Welfare Strategy Have Your Say consultation draft

Animal Care Australia (ACA) is a national incorporated association and registered charity representing the interests of animal keepers, carers, and breeders across a broad range of species.

Animal Care Australia 's purpose is to prevent and relieve animal suffering through education and advocacy, promoting responsible animal care and improved welfare outcomes. Established by experienced animal advocates, Animal Care Australia provides a trusted, evidence-based voice to government and the community.

Animal Care Australia brings together practical experience, species-specific knowledge and contemporary animal welfare principles. We advocate for evidence-based proportionate policies that focus on achieving genuine welfare outcomes for animals. We seek to ensure that the voices and experiences of responsible animal carers are considered in the development of effective animal welfare policy.

Animal Care Australia unites hobbyists, pet owners, and major animal groups to promote high standards of husbandry and safeguard the human-animal bond.

True animal welfare is best driven by education and practical expertise rather than restrictive regulation.

Our guiding principle is simple: ***animal welfare is animal care***

Submission approved: September 2026

This submission has been developed in consultation with a range of members of Animal Care Australia.

This submission provides a broad perspective across all species of pets and companion animals. Animal Care Australia supports the species specific submissions of our member organisations.

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Opening statement

Animal Care Australia will attempt to provide feedback that aligns with the questions from the built-in survey; however, it is impossible and would be irresponsible of us as an animal welfare organisation to be restricted to responding only to those questions without drawing your attention to other notable aspects.

Response to the Working Draft Strategy

Which part of the strategy do you think is the most important?

- Executive summary
- Vision and purpose
- Why animals matter to Australians
- Australia's animal welfare system
- Priority areas, goals, and objectives
- Animal group chapters

Animal Care Australia is astounded at this question. The entire Strategy is supposed to represent the nation's position on Animal Welfare and its strategic future – therefore it is all important. One section has no real context without the others.

Having priority areas, goals and objectives is pointless without having the Animal Group Chapters to apply them to or a Vision and Purpose for that application.

Given that States and Territories are not required to adopt the Strategy, and that the current draft is vague and lacks ambition, how can it be expected to deliver meaningful improvements in animal welfare? We suspect it won't. Animal Care Australia favours a more ambitious and aspirational Strategy. Wouldn't such an approach have had a better chance of encouraging adoption by States and Territories?.

Executive Summary

Animal Care Australia supports the overarching intent of the Australian Animal Welfare Strategy and the Executive Summary and recognises the importance of establishing a nationally coordinated approach to improving animal welfare outcomes, despite there being no requirement for it to be followed or considered.

Animal Care Australia supports:

- ✓ the recognition of animal welfare as a shared responsibility – but with caveats

- ✓ the importance of science and evidence-based decision-making – where the supporting evidence can be verified and is recognised by respected scientists across the world and not simply 'evidence formulated by a small, closed group of scientists;
- ✓ continuous improvement, education, collaboration and,
- ✓ the development of certain consistent national directions.

However, the fourth paragraph states:

> *"The AAWS builds upon existing trusted relationships and animal welfare arrangements in Australia..."*

This is probably the most problematic statement from Animal Care Australia's perspective.

Animal Care Australia has repeatedly identified significant shortcomings in Australia's existing animal welfare governance arrangements.

These include:

- Fragmented animal welfare responsibilities across government departments.
- Inconsistent approaches between jurisdictions.
- Insufficient accountability for animal welfare administration.
- Conflicting departmental responsibilities and priorities.
- A lack of independent oversight.
- Insufficient coordination of animal welfare policy, education, and enforcement.

Animal Care Australia's campaign for an Animal Welfare Commission is fundamentally based on the recognition that existing arrangements are not delivering the coordinated, accountable, and consistent framework that animals deserve. Describing existing arrangements as ***trusted*** suggests that the current system is functioning satisfactorily and simply needs further development.

The Executive Summary repeatedly refers to animal welfare as a shared responsibility and while Animal Care Australia supports this in principle, shared responsibility must not become an excuse for governments to distribute responsibility so widely that nobody is ultimately accountable. The AAWS should explicitly recognise the responsibility of governments to provide effective governance, transparent administration, appropriate resourcing, and independent oversight.

Question: The purpose of the strategy is clear

The Strategy is broadly identifiable, but not sufficiently clear or definitive. Animal Care Australia cannot fully support a national vision without it clearly establishing what the Strategy is actually intended to do, how it will achieve that purpose, and what outcomes it expects to deliver.

The vision is:

> *"Australia achieves good animal welfare outcomes through the development and adoption of animal welfare practices and standards that are underpinned by science and evidence."*

This is a reasonable vision.

However, the Strategy does not clearly establish what constitutes successful implementation.

Although reporting and compliance are identified as a priority area, there is insufficient clarity about:

- Measurable national animal welfare outcomes.
- Baseline assessments against which improvements can be measured.
- Performance indicators.
- Reporting timeframes.
- Responsibility for monitoring and evaluating progress.

While your document stating what feedback will be accepted states 'actions' will not be accepted as you have '*already received feedback on that'* - that feedback is absent within this proposed Summary, Purpose, and Vision. Without these, it becomes difficult to determine whether the Strategy is actually delivering improvements for animals –

We suspect (with regret) that this Strategy will become little more than a glossy document whose vision will have little practical impact on animal welfare outcomes due to its lack of ambition and clear direction. In its current form, the Strategy offers States and Territories little in the way of concrete measures to implement. Animal Care Australia believes the purpose of a national animal welfare strategy should extend beyond documenting existing arrangements and identifying opportunities for collaboration. It should provide a clear and coordinated direction for addressing deficiencies, strengthening animal welfare protections, improving consistency, and achieving demonstrable improvements in the lives of animals.

Recommendation:

The Summary, Purpose and Vision should be strengthened to clearly articulate that the AAWS is intended to provide a nationally coordinated framework for driving, monitoring, and evaluating continuous improvements in animal welfare outcomes, supported by defined responsibilities, measurable objectives, and transparent accountability arrangements.

Question: Do you support the 'Why Animals Matter' statement?

Animal Care Australia would broadly support this section, as it is generally consistent with Animal Care Australia's animal welfare philosophy, published policies, and objectives.

However, there are some important nuances, particularly around animal sentience, the way animal welfare is described, and the reference to the Five Domains Model that are a little more concerning.

Recognition of animal sentience

The opening sentence states:

> *"The AAWS recognises that sentient animals can feel and perceive the world around them."*

While Animal Care Australia acknowledges that animals are sentient, there is an important distinction concerning how sentience is used in animal welfare legislation.

Animal Care Australia has previously expressed concerns about incorporating particular interpretations of sentience into legislation, especially where subjective assessments of an animal's experiences could create uncertainty or unintended regulatory consequences. Animal welfare legislation exists BECAUSE animals are sentient. It is not necessary to continually separate these two aspects. This distinction is important.

Recommendation:

The AAWS should ensure that recognition of sentience is grounded in animal welfare science and does not automatically translate into poorly defined or impractical legislative obligations – especially where obligations are blurred by emotional ethics borne from a need to anthropomorphise animal welfare legislation.

Recognition of the Five Domains Model

The final paragraph states:

> *"Increasingly, animal welfare policy and practices are informed by animal welfare frameworks including the Five Domains Model, which is recognised by WOAH."*

Animal Care Australia supports the reference to the Five Domains Model. However, I would question the precise wording that it is *recognised by WOAH*. WOAH material acknowledges the Five Domains as an internationally recognised framework and has published explanatory material prepared by its Animal Welfare Collaborating Centres. However, this should not necessarily be interpreted as formal adoption of the model as WOAH's overarching animal welfare framework.[1]

Recommendation:

Change the wording to:

> **"The Five Domains Model is an internationally recognised, science-based framework for assessing animal welfare and considering both positive and negative experiences."**

This is more precise and avoids overstating WOAH's formal endorsement.

Question: The roles and responsibilities for animal welfare outcomes in Australia are well defined by 'Australia's animal welfare system'

Animal Care Australia does not agree with this statement as it is currently written**.**

The statement is **overly positive and somewhat misleading**, particularly given the realities of Australia's fragmented animal welfare regulatory system.

The section describes the various roles and responsibilities of governments, industry, animal welfare organisations, veterinarians, and the community. However, describing these roles ***does not necessarily demonstrate that they are well defined.***

There are several concerns.

Fragmented responsibilities across jurisdictions

The AAWS itself acknowledges that animal welfare responsibilities are spread across three tiers of government, with state and territory governments having primary responsibility for animal welfare regulation. This creates significant inconsistencies in legislation, regulatory approaches, enforcement powers, and accountability across Australia.

[1] WOAH Statement

Overlapping and unclear responsibilities

Again, the section identifies numerous government agencies, industry organisations, non-government organisations, and other stakeholders involved in animal welfare. However, it does not adequately explain where responsibilities begin and end, or how overlapping responsibilities should be managed, or who ultimately takes responsibility when animal welfare outcomes fail.

Gaps in accountability

While responsibilities are attributed to various stakeholders, there is little explanation of the mechanisms that ensure those responsibilities are fulfilled. There is a distinction between identifying who has a role in animal welfare and establishing who is accountable for delivering measurable animal welfare outcomes.

Lack of consistent leadership and coordination

The document refers to shared responsibility and joint leadership, but this does not necessarily translate into effective national coordination. Australian states & territories lack a single, independent national animal welfare authority with overarching responsibility for ensuring consistency, coordination, and accountability across jurisdictions.

Companion animal welfare considerations

The section gives considerable attention to agricultural industries and their associated structures. While companion animal carers, animal welfare organisations and veterinarians are acknowledged, the practical challenges associated with fragmented companion animal regulation, breeding, sales, rehoming, and enforcement are not adequately explored.

Recommendation:

Having roles allocated does not mean the system is clearly defined, coordinated or effective.

Australia's animal welfare system remains fragmented across three tiers of government, with significant differences in legislative frameworks, regulatory approaches, enforcement capabilities, and accountability between jurisdictions. There are also overlapping responsibilities and gaps in national leadership and coordination.

While animal welfare is described as a shared responsibility, there is insufficient clarity around who holds ultimate responsibility and accountability for ensuring consistent and measurable animal welfare outcomes.

Animal Care Australia considers that a genuinely effective national animal welfare system requires clearly defined responsibilities, stronger coordination, transparent accountability, and consistent approaches to animal welfare across all jurisdictions and animal sectors.

Therefore, the statement requires editing to reflect these points rather than remaining overly positive and generally misleading.

Question: Which of the priority areas is most important for animal welfare in Australia?

- Leadership and coordination
- Standards and implementation
- Reporting and compliance
- Research and development
- Education and communication
- International engagement

Again, Animal Care Australia is unsure about the purpose and direction of this question. If a majority response points to one of the six, does that then lessen the inclusion or importance of the rest? All of these individual areas make up the whole. They are all inter-connected. That said, had the question been framed as 'which of these areas is most important for **improving** animal welfare in Australia?' then our answer would be **Education and Communication** in partnership with **Leadership and Coordination**

Education and Communication is essential to improving animal welfare because it equips animal owners, carers, industry and the wider community with the knowledge, skills and understanding needed to make informed, responsible decisions. Accessible, evidence-based information and education help promote best practice, challenge misconceptions and build a shared understanding of what good animal welfare looks like, translating awareness into better outcomes for animals.

Improving animal welfare norms throughout the population is the best way to improve national animal welfare outcomes. This requires a dedication to focused education via as many channels as possible. Currently educational initiatives are limited in scope and reach.

Effective *Leadership and Coordination*, clear responsibilities, independent expertise, transparent decision-making, and appropriate accountability are essential foundations

for a functioning animal welfare system. Without these foundations, the remaining priority areas risk operating in isolation, resulting in inconsistent approaches, duplication, gaps in responsibility and ultimately, variable animal welfare outcomes across jurisdictions.

Currently, in most jurisdictions, we have charitable organisations, often with conflicting ideologies to the State, leading and also advising government. This is no longer acceptable. It is time for government to lead based on expert advice from those who study, work, breed and keep animals.

Australia needs stronger coordination, clearer governance arrangements, and genuine accountability for delivering animal welfare outcomes. This includes ensuring that animal welfare policy and decision-making are informed by independent scientific expertise, practical experience, and meaningful stakeholder engagement. This must then be supported by evidence-based standards, consistent implementation, effective compliance, and transparent reporting to ensure that commitments translate into tangible improvements in animal welfare.

Question: 'The objectives outline the areas where animal welfare can be improved across all animal groups in Australia.'

Animal Care Australia somewhat agrees with the objectives. There are caveats that require to be included before our organisation would fully agree with the objectives. These include:

Objective 1: The objective refers to greater clarity and understanding of existing roles and responsibilities. Animal Care Australia highlights that the problem is not simply a lack of understanding but a lack of effective coordination, independent oversight, and accountability. There is an opportunity to strengthen this objective by explicitly recognising the need for independent governance structures that can provide leadership, oversight, and accountability beyond individual government departments.

Recommended emphasis: Australia needs a more cohesive, transparent, and accountable animal welfare governance system, with clearly established responsibilities and independent oversight.

Objective 2: Animal Care Australia's key concerns:

1. National or State standards must establish an appropriate minimum level of animal welfare protection, not simply accommodate existing practices.
2. Consultation must be genuine and representative, rather than dominated by

government agencies, large industry bodies, or selected animal welfare organisations.

3. Standards must be practical, proportionate, and achievable, without compromising the welfare outcomes they are intended to deliver.
4. There must be mechanisms for reviewing standards when new evidence or better practices emerge.

The AAWS and therefore governments must be mindful that the reference to community expectations should not allow emotionally driven or unsubstantiated public opinion to override sound animal welfare science.

Recommended emphasis: National and State standards must be evidence-based, transparent, practical, and consistently implemented, with a commitment to continuous improvement in animal welfare outcomes.

Objective 3: This objective's sections focus is considerably on monitoring, reporting, data collection, and efficiency.

However, they do not sufficiently articulate the importance of:

- Effective enforcement of animal welfare legislation.
- Consistent penalties and consequences for serious or repeated non-compliance.
- Independent oversight of compliance and enforcement activities.
- Public transparency around animal welfare outcomes and enforcement performance.
- Adequate resourcing of regulatory and investigative functions.
- Measuring actual animal welfare outcomes, rather than simply measuring compliance with administrative processes.

It is vital that this Objective and therefore the AAWS does not confuse the existence of compliance systems with the achievement of good animal welfare. An organisation or individual can be technically compliant with a standard without necessarily achieving the best possible welfare outcomes. The opposite is also true, in that compliance and subsequent enforcement does not necessarily achieve an improvement in animal welfare outcomes.

Recommended emphasis: Reporting and compliance must demonstrate measurable improvements in animal welfare, supported by transparent monitoring, consistent

enforcement, and meaningful accountability.

Objective 4: Animal Care Australia recognises the importance of ongoing research, scientific advancement, and evidence-based decision-making in improving animal welfare. This objective area provides an important opportunity to address knowledge gaps, improve animal husbandry practices and ensure standards remain relevant.

There are two areas of concern:

1. **Research priorities must be inclusive.**

The objective refers to governments, Research and Development Corporations and peak bodies drawing on AAWS priorities through their existing funding processes. There is no real recognition that companion animals and other non-commercial animal sectors will not be overlooked simply because they do not have the same established research funding structures as agricultural industries. Research should address animal welfare across all sectors.

2. **Research must translate into practical outcomes.**

Research should not simply generate reports and academic publications. There needs to be a pathway for findings to inform policy, legislation, standards, education, and improvements in animal care.

Recommended emphasis: Research investment must be balanced across all animal sectors, with findings translated into practical, measurable improvements in animal welfare.

Objective 5: This overall objective is the most lacking of the 6 Priorities and Objectives.

Animal Care Australia strongly recommends this objective is strengthened in several ways.

1. **Education must be proactive.** It should not be limited to responding to welfare problems after they occur. Education should help prevent problems before they arise.
2. **Education must be accessible.** Information should be available to animal owners, breeders, exhibitors, rescue organisations, industry participants, and the broader community.
3. **Education must be practical and species-specific.** Generic animal welfare messaging is not sufficient. People need information relevant to the animals they own, manage, or interact with.
4. **Education should be a priority for governments.** There needs to be appropriate

investment in public education, outreach, and awareness programs.

5. **Communication must be balanced and evidence based.** Public messaging should promote responsible animal ownership and good animal care rather than perpetuate misinformation, fear, or unnecessary division.

This Priority must emphasise the relationship between education and compliance. Education can improve voluntary compliance, reduce preventable welfare issues, and support better outcomes without relying solely on punitive approaches.

Recommended emphasis: Education and communication are fundamental to improving animal welfare outcomes nationwide. This requires a sustained commitment to targeted education, delivered through a broad range of channels to overcome the limited scope and reach of current initiatives, improve community animal welfare norms, promote responsible animal care and informed decision-making, and prevent avoidable welfare problems..

Objective 6: Animal Care Australia 's key concerns:

The overarching goal specifically refers to building Australia's sustainable trade credentials and maintaining and securing future market access.

While Animal Care Australia recognises the importance of international trade, it should be clear that animal welfare must not become subordinate to commercial interests.

There is a risk that international engagement could be viewed primarily through the lens of protecting Australia's trading reputation rather than genuinely improving animal welfare.

Recommended emphasis: International engagement should position Australia as a leader in improving animal welfare globally, with trade and market access benefits being a consequence of genuine leadership rather than the primary motivation.

Chapters

Animal Care Australia has provided feedback on more than just the ‘snapshot.’ Asking for feedback focussed only on the snapshot is in our opinion misleading and could be detrimental to the overall Chapter.

Animals in the wild

The section provides a reasonable overview of the different levels of government, regulatory instruments and stakeholders involved in managing wild animals. However, from Animal Care Australia’s perspective, there are several important shortcomings.

Fragmented responsibilities and accountability

The statement acknowledges differences between jurisdictions but does not adequately examine the consequences of fragmented responsibilities. It identifies that implementation, application and review of regulatory instruments differ between jurisdictions, but does not directly address how these inconsistencies can result in variable animal welfare protections and outcomes.

Simply acknowledging these differences is insufficient. There needs to be a stronger focus on nationally consistent animal welfare expectations, accountability, and implementation.

Animal welfare versus environmental management

One of the more significant concerns is the recognition that animal welfare can conflict with environmental, agricultural, and population-management objectives. The statement acknowledges this complexity but does not establish how animal welfare should be prioritised when competing objectives arise.

Therefore, the statement needs to ensure that animals are not treated merely as environmental management considerations or population-management tools.

Animal welfare must remain a central consideration in all decisions involving the management, handling, control, rehabilitation, and destruction of animals. Which leads us to the next shortcoming.

Humane lethal control

The statement recognises humane lethal control as an established management practice and acknowledges the development of national Model Codes of Practice and Standard Operating Procedures.

However, it does not sufficiently address:

- Consistent application and enforcement of humane control standards.
- Independent oversight of lethal control activities.
- Monitoring and reporting of animal welfare outcomes.
- Accountability where approved methods are not followed.
- The importance of continually reviewing the humaneness and effectiveness of control methods.

There must be greater emphasis on ensuring that humane control is genuinely humane in practice, rather than simply having guidelines available.

Wildlife rehabilitation and rescue

The statement appropriately recognises the significant contribution of wildlife rehabilitators (carers), volunteers, veterinarians, and wildlife organisations.

However, it must go further in recognising the importance of:

- Consistent regulatory standards and training for wildlife carers.
- Appropriate resourcing and support for volunteer networks.
- Consistent licensing and permit requirements.
- Access to veterinary services and facilities.
- Clearer coordination between government and wildlife rescue organisations.

Chapter assessment: Animal Care Australia acknowledges that this section identifies many of the legislative, regulatory, and supporting instruments that influence animal welfare outcomes for animals in the wild.

However, while it provides an overview of the existing frameworks, it does not adequately address the fragmentation of responsibilities, inconsistencies in implementation, or the varying levels of protection and accountability across Australian jurisdictions. The distinction between animal welfare legislation, environmental management frameworks, Codes of Practice and Standard Operating Procedures also requires greater clarity, particularly regarding their legal enforceability and practical application.

Animal Care Australia strongly reiterates that animal welfare must remain a central consideration in all activities involving wild animals, including conservation, population management, invasive species control, wildlife rehabilitation, and research. Environmental or population-management objectives should not diminish the importance of individual animal welfare or the obligation to minimise suffering.

The Strategy should place greater emphasis on nationally consistent animal welfare standards, effective oversight, transparent accountability, and the practical implementation of existing frameworks to ensure that animal welfare protections translate into measurable outcomes.

Animals involved in research and teaching

The Chapter provides a reasonable description of Australia's existing regulatory arrangements, but it is largely an explanation of the administrative and regulatory framework rather than an assessment of whether those arrangements deliver good

animal welfare outcomes. It also has shortcomings:

I would identify six areas requiring further consideration.

Independence and accountability of Animal Ethics Committees

The statement identifies Animal Ethics Committees as an important mechanism for institutional oversight. However, it does not adequately address the need to ensure their inclusion of appropriately qualified animal welfare expertise.

Lifetime welfare considerations

Paragraph 12 acknowledges concerns about the management of animals at the conclusion of research. This is an important issue that deserves greater emphasis. Animal welfare obligations should extend throughout an animal's entire life, including:

- Breeding and supply.
- Housing and husbandry.
- Transport.
- Research and teaching procedures.
- Rehabilitation and rehoming where appropriate.
- End-of-life management.

Transparency and public accountability

The statement recognises the absence of national animal-use data. Animal Care Australia would like to see the need for stronger national reporting arrangements emphasised more. Additionally, there is little incentive within this chapter for government to encourage the uptake of effective replacement methodologies.

Animal welfare versus research outcomes

The statement discusses balancing potential animal welfare impacts against potential benefits to humans, animals, and the environment; however, it fails to emphasise scientific advancement should not, in itself, be sufficient justification for compromising animal welfare.

Species-specific expertise

The statement also fails to ensure decisions about animal use, housing, care, and management are informed by appropriate species-specific knowledge and expertise.

Animals involved in work, sport and recreation

The statement acknowledges that regulation is primarily a state and territory responsibility and that approaches differ between jurisdictions. However, the statement is also somewhat generous in its portrayal of the effectiveness of those arrangements.

Different legislation, regulatory approaches, enforcement arrangements, and standards result in inconsistent animal welfare protections depending on where an animal is located or the activity in which it participates. This is a significant weakness of Australia's current animal welfare system and yet it is completely washed over by the statement. Isn't a key role of a national strategy such as this to provide guidance to build national consistency across jurisdictions? An opportunity lost, in this case.

Industry self-regulation and delegated enforcement

Section 8.2 refers to industry standards, organisational policies, accreditation programs, and delegated enforcement arrangements. However, while it is important to recognise the value of industry participation, it is equally important to ensure these arrangements are not considered substitutes for independent regulatory oversight. Industry-led standards and self-regulation must operate alongside appropriate government oversight, transparency, accountability, and enforceable minimum welfare requirements. Which leads us to the next point.

Independent oversight and accountability

One significant omission is the absence of any meaningful discussion about independent animal welfare oversight.

Animal Care Australia has consistently advocated for stronger, independent, and accountable animal welfare governance. Ie Animal Welfare Commission.

The statement discusses the roles of governments, industry and non-government organisations but does not sufficiently address the need for transparent regulatory decision-making, independent oversight, and accountability for animal welfare outcomes.

Animal welfare outcomes versus industry interests

The statement recognises the significant economic, social, and cultural contributions of animals involved in work, sport, and recreation.

While this is appropriate, Animal Care Australia believes this statement must also ensure that economic, commercial, sporting, and recreational interests do not take

precedence over animal welfare. Animal welfare should remain the primary consideration when determining acceptable practices, standards, and regulatory requirements.

Missing from the Chapter:

Animal Care Australia draws your attention to our top three priorities (or objectives as referred to in the AAWS):

1. **Independent oversight:** Greater recognition of the need for independent regulatory oversight and accountability.
2. **Animal welfare science:** A stronger commitment to contemporary animal welfare science, including positive welfare, behavioural needs, and the ability to express natural behaviours.
3. **Transparency and reporting:** Clearer expectations for monitoring, reporting, and publicly demonstrating animal welfare outcomes.

Chapter Assessment:

Animal Care Australia supports the recognition of the multiple regulatory, industry and organisational arrangements that contribute to the welfare of animals involved in work, sport, and recreation. However, the existence of these arrangements does not necessarily demonstrate that an effective or sufficiently protective animal welfare framework is in place.

While industry participation and self-regulatory initiatives can contribute positively to animal welfare, they must not replace effective oversight, independent accountability, and enforceable minimum welfare protections.

Animal welfare frameworks must be underpinned by contemporary animal welfare science, consistent standards, transparent monitoring, and meaningful enforcement. Importantly, animal welfare must remain the primary consideration in all activities involving animals, irrespective of their commercial, sporting, operational or recreational purpose.

There must also be greater recognition of whole-of-life welfare responsibilities, ensuring that animals receive appropriate care and protection before, during and after their involvement in these activities.

Aquatic Animals

Ornamental aquatic animals

The ornamental fish industry receives some attention, particularly concerning transport, retail environments, and biosecurity. This is an opportunity to address the broader welfare responsibilities associated with keeping ornamental aquatic animals.

These include:

- Appropriate aquarium size and environmental conditions.
- Water quality and temperature management.
- Species compatibility and stocking densities.
- Appropriate nutrition and husbandry.
- Transport and acclimatisation.
- Responsible sale and consumer education.

Animal Care Australia would like to see stronger recognition of the responsibilities of retailers, suppliers, and owners in ensuring appropriate lifelong care.

Chapter Assessment:

Animal Care Australia acknowledges that this chapter identifies many of the regulatory, industry and voluntary arrangements that contribute to aquatic animal welfare in Australia. However, the current framework remains fragmented, inconsistent and, in some circumstances, insufficient to ensure appropriate welfare protections for all aquatic animals.

Animal Care Australia is concerned that some aquatic animals and fishing practices fall outside existing animal welfare legislation, creating gaps in legislative protection and accountability. The reliance on voluntary industry guidelines, codes of practice and certification schemes also raise concerns where these are not supported by enforceable minimum welfare standards or independent oversight.

While environmental sustainability, biosecurity and industry viability are important considerations, they must not overshadow the welfare of individual animals. Animal welfare should be recognised as an independent priority, with appropriate consideration given to the prevention of unnecessary suffering throughout an animal's life, including capture, handling, transport, husbandry, display, and slaughter.

Animal Care Australia supports a stronger focus on evidence-based standards, improved education, and greater consistency in legislative protections. Voluntary

industry initiatives should complement, rather than substitute for, appropriate legislative requirements and government oversight.

Australia needs a more cohesive and accountable aquatic animal welfare framework that places the welfare of animals at the forefront, rather than relying on a combination of differing jurisdictional arrangements and voluntary industry commitments.

In fact, the chapter itself identifies several weaknesses that support ACA's longstanding advocacy for more consistent, accountable, and enforceable animal welfare arrangements in Australia.

Companion Animals

First and foremost: The Chapter still continues to refer to pets as EXOTIC. They are not exotic – especially the examples provided – reptiles and birds.

Pets are pets – there should not be a label used to separate other species simply based on the misguided belief that species other than dogs and cats require extraordinary care. ALL pets require care at varying levels. Certain dog breeds require extraordinary care compared to others – does not make them exotic dogs!

All animals kept in captivity as pets in Australia are captive bred, in the vast majority of cases for multiple generations with well-established management of their welfare needs. The term EXOTIC is emotive and no longer appropriate.

This misuse of the word EXOTIC must stop.

While Animal Care Australia broadly agrees that this section provides a useful overview of the companion animal sector and identifies many of the key issues affecting companion animal welfare in Australia, Animal Care Australia does not consider it to be a sufficiently comprehensive or accurate outline of the animal welfare frameworks governing companion animals.

The statement is quite comprehensive in describing the sector, its stakeholders, challenges, and opportunities. However, from Animal Care Australia's perspective, there are several important omissions and areas requiring further development.

Regulatory oversight: There is insufficient examination of who is responsible for overseeing animal welfare, how accountability is maintained and whether existing arrangements are effective.

Enforcement: It acknowledges enforcement challenges but does not sufficiently examine inconsistent enforcement practices and powers, prosecution outcomes, penalties, resourcing, or accountability.

Breeding and sales: Although breeding reforms are mentioned, there is insufficient attention to the inconsistent regulation of pet sellers, particularly online sales.

Species-specific focus: It recognises specialised welfare needs but does not adequately address the importance of appropriate acquisition, breeding, trade, and species-specific regulatory protections.

Animal welfare expertise: There is little consideration of the need for independent animal welfare expertise in policy development, regulatory oversight, and decision-making.

Fragmented governance and accountability

This is perhaps the most significant omission. The statement describes the involvement of multiple government portfolios, agencies, local governments, RSPCA inspectorates, and other enforcement bodies.

However, it does not adequately address the underlying problem: **animal welfare responsibilities are fragmented across multiple agencies and government structures, often without clear accountability for overall animal welfare outcomes.**

Animal Care Australia has consistently advocated for stronger, more independent, and accountable animal welfare governance.

The statement should recognise the importance of:

- Clear responsibility for animal welfare policy and outcomes.
- Independent animal welfare expertise.
- Effective coordination across government agencies.
- Transparent regulatory oversight.
- Adequate funding and resources.
- Accountability for implementation and enforcement.

This is particularly important given that the AAWS is intended to improve Australia's animal welfare system, not simply describe its existing arrangements.

The role of non-government organisations

The statement appropriately acknowledges the significant responsibilities placed on NGOs, particularly regarding enforcement and rescue.

However, it should more clearly distinguish between government responsibilities and the supporting role undertaken by non-government organisations.

Animal welfare enforcement is fundamentally a government responsibility. It is no longer appropriate for non-government authorised organisations to provide enforcement services. Governments cannot continue to be dependent on charitable organisations to deliver essential animal welfare protections.

The importance of responsible animal keeping

The statement discusses responsible ownership but could go further in recognising that responsible animal keeping also requires access to accurate, species-specific information before acquiring an animal.

This is particularly important for **non-traditional companion animals**, where inadequate knowledge of their specific requirements can result in significant welfare compromises.

Animal Care Australia would support the inclusion of stronger education, accessible resources and collaboration with established species-specific associations and responsible animal-keeping organisations. It is these specialised animal-keeping organisations that possess the required animal welfare expertise.

Assessment of the proposed Opportunities

The proposed opportunities are generally worthwhile; however, they are largely focused on collaboration and service delivery. **What is missing is a stronger commitment to improving the regulatory and governance frameworks themselves including:**

1. **Independent governance and accountability:** Strengthen animal welfare governance through clearly defined responsibilities, independent expertise, transparent oversight and appropriate accountability for animal welfare policy and enforcement outcomes.
2. **Effective regulatory enforcement:** Ensure animal welfare enforcement is conducted by a government employed inspectorate with appropriate legislative powers, training, resources, and accountability mechanisms to deliver consistent and effective outcomes.
3. **Responsible breeding and animal sales:** Strengthen regulatory oversight of online sales, traceability, and cross-jurisdictional compliance.
4. **Evidence-based welfare standards:** Ensure species-specific standards and codes of practice are developed through transparent consultation, incorporating animal welfare science, veterinary expertise and practical knowledge from responsible animal-keeping organisations and industry.

What Animal Care Australia would support:

- **Broad definition of companion animals:** Including traditional and non-traditional species, recognising that animals kept as pets have welfare needs regardless of whether they are domesticated or commonly recognised as pets.
- **Recognition of shared responsibilities:** Acknowledging that animal welfare is not solely the responsibility of owners, but involves governments, industries, veterinary professionals, animal welfare organisations, and the broader community.
- **Recognition of jurisdictional differences:** Acknowledging the inconsistencies between state and territory legislation, regulatory arrangements, and enforcement.
- **Importance of education:** Recognising that informed ownership, appropriate husbandry, species-specific knowledge, and evidence-based behavioural training contribute to positive welfare outcomes.
- **Breeding and traceability:** Identifying concerns around breeding practices of unregistered operators, interstate movement, and inconsistent regulatory arrangements.
- **Shelter and rescue pressures:** Recognising the significant contribution of rescue organisations and the welfare implications of overcrowding, financial pressures, and euthanasia. The need to regulate the shelter and rescue industry in order to provide more accountability, transparency, and traceability of species in their care.
- **Emergency preparedness:** Recognising the importance of including companion animals in emergency planning.

These are all relevant considerations for a national animal welfare strategy.

Chapter Assessment:

Animal Care Australia broadly supports the information presented in this chapter and acknowledges that it provides a useful overview of the companion animal sector, the responsibilities of stakeholders and many of the challenges affecting companion animal welfare in Australia.

However, Animal Care Australia considers that the chapter provides a greater focus on the companion animal sector and responsible ownership than on the actual animal welfare frameworks, governance arrangements and regulatory mechanisms that underpin animal welfare outcomes.

While the chapter acknowledges the fragmented nature of Australia's animal welfare system and the differences between state and territory regulatory arrangements, it does not sufficiently address the consequences of these inconsistencies, particularly regarding legislative protections, regulatory oversight, enforcement, accountability, and the application of minimum welfare standards.

Our member organisations recommend an approach whereby standards are backed by education to promote compliance. Such standards to be developed by independent animal welfare experts including representatives from animal-keeping organisations for each species group.

Animal Care Australia would also emphasise the importance of recognising the contribution of responsible animal-keeping organisations, species-specific associations, and industry representatives in developing practical, evidence-based welfare standards and education initiatives, particularly for non-traditional companion animals.

The Australian Animal Welfare Strategy should provide a stronger commitment to addressing the fragmentation of animal welfare governance and establishing a more consistent, accountable, and effective approach to companion animal welfare.

Animal Care Australia therefore considers that further development is necessary to adequately describe the existing frameworks, identify their shortcomings and establish meaningful opportunities for improving companion animal welfare across Australia.

Livestock and production animals

This Chapter sits outside of Animal Care Australia’s purview when considering the included clarification of where different species might appear within each Chapter. Animal Care Australia does include farm animals – but only when kept as pets or on hobby farms – therefore falling within the Companion Animals Chapter, as well as the Working Animals Chapter in the case of horses.

Chapter Assessment:

The first notable point was the inclusion of slaughter statistics for chickens which in our view seemed well under-estimated/counted. The livestock processing statistics should be checked.

The statement refers to 7.3 million chickens processed in 2023–24. This appears to be substantially incorrect. ABS figures show approximately 182–187 million chickens slaughtered per quarter during 2023–24, equating to approximately 737 million annually.

Relating to the Chapter, there is also a tendency to place considerable emphasis on industry-led initiatives, productivity, trade, and economic sustainability, without giving equal consideration to independent animal welfare oversight and the overall welfare of animals as the primary objective.

Importantly, animal welfare must be recognised as an objective in its own right, rather than being primarily associated with productivity, market access, trade reputation, or economic sustainability.

Closing statement:

Animal Care Australia believes there is an opportunity for the Strategy to move beyond describing existing arrangements and aspirational objectives and establish a stronger vision for meaningful reform of Australia's animal welfare governance system.

This should include consideration of independent animal welfare governance structures capable of providing coordinated leadership, expert advice, consistent policy direction, and accountability for animal welfare outcomes across all jurisdictions

Australia's current animal welfare governance framework remains fragmented across government departments and jurisdictions, with inconsistent approaches, divided responsibilities, and insufficient accountability. The Strategy presents an important opportunity to address these shortcomings through meaningful structural reform.

Animal Care Australia particularly advocates for independent Animal Welfare Commissions in each State and Territory, providing centralised oversight, strategic leadership, coordination and accountability for animal welfare policy, administration, education, and enforcement.

We also believe that shared responsibility must be accompanied by clearly defined government obligations, measurable objectives, transparent reporting, appropriate funding, and effective mechanisms to evaluate whether animal welfare outcomes are genuinely improving.

Animal welfare must remain the primary objective of the Strategy. Decisions must be informed by sound science, veterinary expertise, practical animal-keeping knowledge and meaningful consultation with the communities and organisations that work directly with animals.

Animal Care Australia supports the development of a strong national animal welfare framework. However, its success must ultimately be measured not by the commitments made, but by demonstrable improvements in the welfare and quality of life of animals across Australia.

Animal Care Australia welcomes any questions you may have as you continue to finalise the Strategy.

This submission can be published in full on the website including the signatory's name.

On behalf of the Animal Care Australia Committee,



Michael Donnelly
President
Animal Care Australia

About Animal Care Australia

As a nationally recognised animal welfare organisation and Australian Registered Charity, 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