

Renewing the Australian Animal Welfare Strategy 2024

WOOLPRODUCERS
AUSTRALIA

Via email: AAWS@aff.gov.au and online submission.

30 June 2024

To whom it may concern,

On behalf of WoolProducers Australia (WoolProducers), I would like to thank you for the opportunity to present this submission into the renewal of the 'Australian Animal Welfare Strategy' (AAWS).

WoolProducers is the peak representative body for Australian woolgrowers, representing and advocating on behalf of all woolgrowers in the country, rather than just certain sectors. Our mission is to develop, profitable and sustainable outcomes for woolgrowers nationally.

WoolProducers represents the single largest body of woolgrowers through our fee-paying State Farm Organisation membership network and three democratically elected Independent Directors and is the only national organisation that can speak on behalf of the mainstream wool industry and represent the concerns and interests of all Australian woolgrowers. Our representation capacity includes the industry's commercial, superfine, broad wool and stud breeding sectors.

WoolProducers Animal Welfare Policy

One of WoolProducers six strategic priorities¹ is the '*Representation of wool growers in respect to national animal health and welfare priorities*'. To demonstrate our commitment to national grower representation, WoolProducers Australia has established an Animal Health and Welfare Advisory Committee. The membership of this Advisory Committee includes:

- The WoolProducers Executive
- Australian Superfine Wool Growers Association
- MerinoLink
- SRS Genetics Ltd
- Australian Association of Stud Merino Breeders
- Australian Stud Sheep Breeders
- Australian Veterinarian Association – Sheep Vets Special Interest Group (Technical Advisor/Observer)
- Animal Health Australia (Observer)
- Australian Wool Innovation (Observer)

Through this committee, the WoolProducers Board are advised on matters relating to animal health and welfare in order to determine industry relevant policy². WoolProducers animal welfare policy is underpinned by:

- Objective science-based evidence
- Research, Development and Extension (RD&E) of best practice animal welfare
- Collaboration in RD&E in relation to animal welfare best practice amongst stakeholders with a genuine interest in sustainable livestock production
- Acknowledgement of sheep sentience
- Recognition of the Five Domains Animal Welfare Model.

¹ [WoolProducers Australia Ltd Strategic Plan 2023 - 28](#)

² [WoolProducers Australia Policy Document 2023/24](#)

Wool and Sheep Industry animal welfare investment

Further to this WoolProducers, together with Sheep Producers Australia lead the Sheep Sustainability Framework³, with Australian Wool Innovation (AWI) and Meat & Livestock Australia (MLA) providing funding, strategic advice and secretariat support. The Sheep Sustainability Framework monitors and measures industry performance against priorities aligned with the four themes (one of which is “Caring for our sheep⁴”). The framework informs planning, management, and evaluation of activities at an industry level and helps to ensure Australia can demonstrate we are a global leader in sustainable sheep production.

WoolProducers policy development and advocacy process, coupled with the Sheep Sustainability Framework and our industries continual investment in RD&E to improve, inform and implement best practice sheep welfare clearly demonstrated our commitment to ongoing improvement to sheep welfare in the context of sustainable and profitable wool and sheep meat industries.

Australian Animal Welfare Strategy – the need for collaboration and trust

While consultation briefings by officials from the Department of Agriculture, Fisheries and Forestry over the last 12 months have repeated that the objectives and outcomes of AAWS will be informed by science and evidence, it is this very point, and the conduct of the Australian Government in recent months that brings us to the conclusion that the AAWS, as proposed, is not fit for purpose

The recent *Inquiry into Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024*⁵ demonstrated the inability of the Australian Government to fully consider current, unbiased and substantiated evidence in an objective manner. The inquiry committee was very clearly operating to a pre-determined outcome, openly demonstrating what can only be described as a very-near complete disregard to the evidence presented by Australian woolgrowers and sheep meat producers, their respective service providers, supply chain partners, dependant community groups and organisations.

Cherry picking “evidence” to either inform the development of, or justify a policy position, is not a mature approach and, quite frankly, Australian farmers deserve better from the Australian Government, Ministers and Departments. Policy positions of the Albanese Government in recent months, together with the confirmation bias of parliamentary processes and government departments have recently resulted in the National Farmers Federation passing a motion of confidence in the Albanese Government to act in the interests of Australian agriculture⁶.

To ensure that AAWS is fit for purpose and fosters genuine collaboration, WoolProducers is recommending a minor, yet critical amendment. We recommend that all references to “science and evidence” be amended to “science-based evidence”. The requirement for science-based evidence will assist with mitigating some of the risk of politicising AAWS through minimising the confirmation bias that has been displayed in recent times.

Enclosed to this letter are discussion points and responses to the questions presented in the *Renewing the Australian Animal Welfare Strategy: discussion paper*. Our responses relate to AAWS overall, and

³ [Sheep Sustainability - Home | Sheep Sustainability \(sheepsustainabilityframework.com.au\)](https://sheepsustainabilityframework.com.au)

⁴ [Caring for our sheep | Sheep Sustainability \(sheepsustainabilityframework.com.au\)](https://sheepsustainabilityframework.com.au)

⁵ [Inquiry into Export Control Amendment \(Ending Live Sheep Exports by Sea\) Bill 2024 – Parliament of Australia \(aph.gov.au\)](https://aph.gov.au)

⁶ [Australian agriculture passes vote of no confidence in the Albanese Government - National Farmers' Federation \(nff.org.au\)](https://nff.org.au)

specifically the following proposed chapters, which align directly to the interests of Australian woolgrowers:

- livestock and production animals
- animals in the wild (native, introduced and feral animals)
- animals used for work, sport and recreation.

Should you wish to discuss our submission further, please contact me on 0455 442 776, or via email (gm@woolproducers.com.au).

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Dawes', written in a cursive style.

Adam Dawes
General Manager
WoolProducers Australia

Enc. WoolProducers responses to *Renewing the Australian Animal Welfare Strategy: discussion paper*

WoolProducers responses to Renewing the Australian Animal Welfare Strategy: discussion paper

Vision

To establish an Australian animal welfare system that brings stakeholders together, identifies national priorities with actions and outcomes, and demonstrates to the public and international partners that Australia values the welfare of all animals.

The vision must underpin the ability to ensure that the Australian animal welfare system is fit for purpose and serves the unique needs of Australian farming systems. The vision must ensure that the Australian animal welfare system is informed by science-based evidence. The system must support governments and industries to advocate for the excellence of the Australian animal welfare system when engaging with their respective stakeholders.

We suggest the inclusion of “relevant” when referring to stakeholders. The national prioritisation process and work undertaken within projects and programmes that align with AAWS must only be informed by those with a genuine interest in the long-term sustainability of livestock production. AAWS must consider, but not be influenced by, fringe human ethical and ideologically based opinions. Further to this, any groups that suggest the consideration of alternatives to animal products on the grounds of kindness or animal welfare must be excluded from being acknowledged as a contributing stakeholder of AAWS. The intent of such groups is to see the end of livestock production in all its forms, as such it is not possible for these groups to contribute to initiatives (such as AAWS) in a way that will improve the welfare outcomes of animals while maintaining a sustainable and profitable livestock sector.

Australia’s animal welfare system must empower Australian governments (federal and state) and industry groups to advocate for the world leading production systems and animal welfare practices adopted in Australia that have evolved over many years to be relevant to Australian production systems and our unique environment. The vision needs to empower Australia to advocate for the acceptance of improved animal welfare outcomes (rather than prescriptive practices) that are relevant to available resources and production systems and ensure a sustainable livestock production sector.

Work streams

All of the work of AAWS must be informed by science-based evidence that improves animal wellbeing. Where gaps exist in science-based evidence, they should be addressed via the national prioritisation process (see Vision). In recent years there have been too many occasions where the concept of loss of “social license” has been mis-used to obtain credibility for arguments or opinions for which there is no credible science-based supporting evidence.

Across the work streams there must be an allocation of responsibilities to relevant industry / government stakeholders. Where national prioritisation increases the responsibilities of certain relevant stakeholder groups, there must be sufficient resourcing available to ensure that these obligations can be fulfilled.

The outcomes of AAWS must empower Australian governments (federal and state) and industry groups to advocate for the world leading production systems and animal welfare practices adopted in Australia that have evolved to be relevant to Australian production systems and our unique environment. AAWS should allow Australia to champion animal welfare improvements in a global context, particularly through multilateral forums, such as the World Organisation for Animal Health (WOAH) and the World Food Organisation (FAO).

Challenges and Opportunities

Challenges and opportunities will be discussed collectively whether they remain a challenge or an opportunity will be dependent on the final content of AAWS and the respective chapters, along with the relevant commitment from government and industry stakeholders to deliver on the strategy.

Acknowledge industry investment

There is a need to better acknowledge industry developed self-regulatory and monitoring systems that relate to animal welfare. Initiatives such as the National Wool Declaration (NWD) and the Livestock Production Assurance (LPA) scheme incorporate elements that audit, monitor and certify production practices that relate to positive animal welfare outcomes.

There is a need to better acknowledge and promote the substantial investment that industry already makes to continually improve animal welfare and wellbeing. The utility of initiatives such as the Sheep Sustainability Framework, the Australian Beef Sustainability Framework and the Australian Agriculture Sustainability Framework in the context of improving animal welfare must be acknowledged by all relevant stakeholders of AAWS with an interest in sustainable livestock production.

Outcomes based advocacy

In recent years we have regularly seen circumstances where it has been generally accepted that certain practices undertaken in one country are / are not universally acceptable in terms of animal welfare outcomes. Posturing Australia's animal welfare system and / or practices to optimise market access or community acceptability may (in some circumstances) result in a decline in the lifetime wellbeing of Australian livestock. The vision needs to empower Australia to advocate to domestic and international partners for the acceptance of improved animal welfare outcomes that are relevant to available resources and production systems, while ensuring a sustainable livestock production sector.

Conflicting stakeholder views

In recent years we have seen the increasing threat that activist groups present in relation to livestock production. The anti-livestock production views of these groups are often informed by fringe human ethical and ideological based arguments and obtain false credibility through social media campaigns and exploiting the concept of "social license". Any groups that suggest the consideration of alternatives to animal products on the grounds of kindness or animal welfare must be excluded from being accepted as a stakeholder to AAWS, as they have no genuine interest in improving animal welfare in the context of sustainable livestock production.

In recent years the Royal Society for Prevention of Cruelty to Animals (RSPCA) has undertaken activities that increasingly place it in a position of an untenable conflict of interest. In Australia, animal welfare legislation is enforced by state and territory governments in partnership with the RSPCA and other authorised agencies. Recently the RSPCA has advocated against, and at times for the legislated prohibition of, legally permitted activities, such as mulesing and the live export of sheep. This conflict of interest is a clear conflict of interest and compromises the separation of powers that underpins trust and integrity in Australia's legal system. AAWS must seek to address such risks, as they present a threat to trust and transparency in our animal welfare system.

The need for genuine collaboration and trust

AAWS must facilitate a partnership of collaboration and trust amongst relevant stakeholders with a view to ensuring a sustainable and profitable Australian livestock sector.

The recent Inquiry into Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024 demonstrated the inability of the Australian Government to fully consider current, unbiased and substantiated evidence in an objective manner. The inquiry committee was very clearly operating to a pre-determined outcome, openly demonstrating what can only be described as a very-near complete disregard to the evidence presented by Australian woolgrowers and sheep meat producers,

their respective service providers, supply chain partners, dependant community groups and organisations.

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Demonstrating global leadership

AAWS must enable Australian government and industry stakeholders to champion improvements to animal welfare outcomes in a global sense. The increasing global importance of sustainability, which includes animal welfare, is elevating such issues as important non-tariff trade barriers (NTTB). It is essential that Australian producers (and our animals) are not unfairly disadvantaged, or subject to perverse adverse animal welfare outcomes, in pursuing compliance with these NTTBs to achieve and / or maintain market access.

AAWS should empower Australia to champion animal welfare improvements in a global context, particularly through multilateral fora, such as the World Organisation for Animal Health (WOAH) and the World Food Organisation (FAO).

