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AAWS Strategy Advisory Group  
Department of Agriculture, Fisheries and Forestry  
Canberra, ACT 2600

Submission via website: [Renewing the Australian Animal Welfare Strategy - Agriculture hub](#)

Dear Strategy Advisory Group (SAG) members,

**Re: Renewing the Australian Animal Welfare Strategy**

Thank you for the opportunity to provide comments on Renewing the Australian Animal Welfare Strategy (AAWS).

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. They are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's \$34 billion livestock industry and the \$33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

Veterinary medicines play a critical role in preserving and protecting both animal health and animal welfare. Animal health products are essential tools used by pet owners, farmers and veterinarians to treat, protect and prevent a broad range of diseases and conditions, as well as medicines that enable good health and wellbeing. Healthy animals are much less susceptible to disease and infection, and good animal health is an essential precondition to beneficial animal welfare outcomes.

AMA supports the renewal of the AAWS and considers that a renewed national strategy will provide foundational guidance and direction for all industries involved with animals and their care. An AAWS should promote national consistency in the development and application of animal welfare frameworks, regulations and minimum standards that are based on scientific evidence and risk assessment.

The new AAWS should clearly acknowledge the importance of appropriate, timely, responsible, and judicious use of veterinary medicines as essential tools to enable positive animal health, welfare, food safety and human health outcomes.

Animal welfare regulations, guidelines, policies and practices must be based on science and evidence and adhere to the government's principles for best practice regulation.<sup>1</sup> These should be underpinned by consultation with stakeholders to ensure the desired outcomes are both appropriate and achievable.

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<sup>1</sup> [Home | The Office of Impact Analysis \(pmc.gov.au\)](#)

The new AAWS should recognise the existing work done by various animal industries to develop sector-specific welfare guidelines, codes of best practice, and the inclusion of welfare indicators in quality assurance and sustainability frameworks. These industry programmes deliver positive welfare outcomes that are appropriate and realistic for the particular animals and environments.

It is desirable for a national strategy to prioritise national consistency in regulations and standards across jurisdictions wherever possible. Individual states and territories may choose to supplement the national strategy with their own animal welfare policies and programs, but these should be clearly aligned with the national strategy and priorities. Coordinated and collaborative approaches to animal welfare will maximise efficiencies and benefits, enable resources to be allocated most effectively, and reduce duplication of reporting and administrative requirements of regulators and other authorities.

Meaningful engagement with stakeholders is essential to ensure the appropriateness, feasibility and effectiveness of any proposed actions. The unintended consequences of poorly designed legislation was made clear in NSW recently:

The *Animal Research Amendment (Right to Release) Bill 2022*<sup>2</sup> restricts the length of time a particular animal can be used in research establishments before it is required to be rehomed. This legislation will necessitate the breeding of additional companion animals (approx. 3- to 5-fold) to meet the legislative requirements of the Australian Pesticides and Veterinary Medicines Authority (APVMA) to register an animal health product in Australia. The subsequent implementation guidelines for the Right to Release Act extend well beyond the requirements as worded in the legislation and will further increase the number of companion animals required to be bred, used and rehomed by up to 40- to 50-fold.

Longer-term, the impact of this legislation could mean that the conduction of local animal health trials may no longer be feasible. The APVMA often requires locally run trials for product registration. Without the ability to conduct these local trials, pet owners in Australia will be negatively affected due to the lack of product registration and availability for use for their pets. Treatment options will be limited and important new medicines will not be available to benefit Australian pets. This legislation will not deliver better animal welfare outcomes.

AMA supports the engagement of Australian governments in the development of internationally-recognised welfare measures and standards through global organisations like the World Organisation for Animal Health (WOAH). Animal welfare is becoming increasingly important in international trade agreements and treaties, and given Australia's economic dependence on the export of high-value agricultural commodities such as meat, milk and wool derived from animals, it is vital for Australia to remain actively engaged in these global conversations.

We encourage the SAG to include forward planning activities in the development of the new AAWS in order to secure ongoing support for implementation of the final Strategy.

We trust that these comments are of assistance and look forward to further consultation over the next three years as the Strategy is developed. AMA member companies provide animal medicines used in all 6 of the identified animal groups that will have a dedicated chapter in the Strategy.

Please let me know if we can provide any further information to assist at this time.

Yours sincerely,

Dr Charmian Bennett  
Director Science and Policy

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<sup>2</sup> Parliament of NSW. Animal Research Amendment (Right to Release) Bill 2022; available at <https://www.parliament.nsw.gov.au/bills/Pages/bill-details.aspx?pk=3969>