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Dr Emily Orchard-Mills
A/g Director
Australian Animal Welfare Strategy
Animal Welfare and Regulatory Stewardship Branch
Department of Agriculture, Fisheries and Forestry

E-mail: aaws@aff.gov.au

Submission via HaveYourSay website: Renewing the Australian Animal Welfare Strategy - Department of Agriculture, Fisheries and Forestry

Dear Dr Orchard-Mills,

RE: draft Australian Animal Welfare Strategy

Thank you for the opportunity to provide comment on the draft 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. AMA members are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products to Australia's livestock industries, veterinarians and pet owners. AMA members represent approximately 80 per cent of registered veterinary medicine sales in Australia.

AMA supports the development of a renewed national animal welfare strategy and welcomes the Australian Government's commitment to maintaining modern, sustainable, science- and evidence-based approaches to animal welfare. The final Strategy should not be used to treat community or political sentiment, or advocacy as a substitute for scientific evidence, but instead provide a common language for difficult conversations and support transparent, constructive progress.

The draft Strategy highlights the importance of national consistency, collaboration, stakeholder engagement and continuous improvement in animal welfare outcomes. AMA supports the Strategy's stated purpose of setting out goals and objectives towards continuous improvement in animal welfare, and providing a framework for national dialogue and progress. It should not be used to predetermine the future of Australia's lawful animal industries or to justify any potential policy reform.

AMA was pleased to see that a number of recommendations previously provided in relation to the companion animals chapter have been reflected in the consultation draft, including references to the integration of animal health and welfare into support services for vulnerable people, improved access to preventative veterinary care, workforce capability, and emphasising the role of technology and artificial intelligence as support tools rather than replacements for good animal husbandry and regular veterinary care. Noting the emphasis on the importance of stakeholder engagement and collaboration, however, AMA is disappointed not to have been included in consultation relating to other chapters, notably the *Animals involved in research and teaching* and the *Livestock and production animals* chapters.

AMA welcomes the opportunity to provide the following comments on the draft Australian Animal Welfare Strategy for consideration by the Department.

In summary, AMA recommends:

- that the Strategy explicitly recognises that good animal health is a precondition for good animal welfare, and that timely access to animal health innovation is key to improving welfare outcomes across all animal sectors,
- that the *Animals involved in research and teaching* chapter recognise the contribution of the animal health sector to improving animal welfare outcomes through innovation and research, and promotes harmonisation with existing local regulatory requirements and global regulatory harmonisation initiatives,
- that the *Livestock and production animals* chapter include opportunities to stocktake existing industry activities, standards and guidelines to inform future prioritisation and coordination efforts, and
- that robust, inclusive consultation with affected stakeholders is prioritised as future initiatives are developed.

Animal health is a prerequisite for animal welfare

While AMA welcomes the Strategy, we are disappointed that it does not more clearly recognise the fundamental relationship between animal health and animal welfare.

Good animal health is a precondition for good animal welfare. Animals cannot experience positive welfare outcomes if preventable disease, injury or illness are not appropriately prevented, managed or treated. Access to veterinary care, preventative healthcare, vaccines and veterinary medicines are therefore essential enablers of good animal welfare outcomes.

Although the Strategy acknowledges the importance of animal health in several sections and references the role of veterinarians, these references are not consistently reflected throughout the document and the critical role of access to veterinary medicines and animal health products is largely absent. The World Organisation for Animal Health definition cited in the Strategy itself recognises that good animal welfare requires disease prevention and appropriate veterinary care.

AMA **recommends** that the Strategy more explicitly recognise:

- that good animal health is a prerequisite for good animal welfare;
- the importance of timely access to veterinary care, vaccines and veterinary medicines;
- the role of robust, science-based regulatory systems in supporting animal welfare outcomes; and
- the contribution of animal health innovation to improving welfare outcomes across all animal sectors.

In particular, AMA considers that references to animal health should be strengthened in the sections addressing Australia's animal welfare system and the livestock and production animal chapter, where animal health, disease prevention, biosecurity and access to veterinary medicines are intrinsically linked to welfare outcomes. The Strategy already acknowledges the role of veterinarians in safeguarding animal health and welfare and the importance of animal husbandry and health outcomes; however, these concepts should be more consistently integrated throughout the document.

Animals involved in research and teaching

AMA was disappointed not to have been included in targeted consultation regarding the *Animals involved in research and teaching* chapter.

The draft chapter recognises that animals are involved in regulatory testing, product safety assessment, diagnostic validation and certain field trials. These activities are essential to ensuring that veterinary medicines and animal health products can be registered for use in Australia and continue to meet rigorous standards of safety, quality and efficacy.

Animal health companies are subject to comprehensive regulatory requirements administered by the Australian Pesticides and Veterinary Medicines Authority (APVMA). To register a veterinary medicine in Australia, applicants must provide specific scientific data demonstrating the safety, efficacy and quality of the product. In many circumstances, this includes studies involving the target animal species, conducted in accordance with strict animal welfare requirements, ethical oversight arrangements and Good Laboratory Practice standards. Strict animal welfare obligations relating to the use of animals in research, including rehoming are outlined in regulations and via licenses administered by State and Territory governments.

AMA recognises that the Strategy is not intended to establish policy positions. Nevertheless, care should be taken to ensure that opportunities identified under the Strategy support future policy development that remains aligned with existing Commonwealth regulatory frameworks and Australia's international obligations and initiatives, including those administered through the APVMA and internationally harmonised approaches such as the Veterinary International Conference on Harmonisation (VICH).

AMA is concerned that some future policy proposals arising from the Strategy could unintentionally create barriers to the research required to support registration of animal health products, potentially reducing access to important veterinary medicines and animal health technologies. Any future reforms should aim to support the development and registration of innovative animal health products necessary to protect animal health and welfare in Australia, while upholding and promoting high standards of animal welfare.

AMA **recommends** that the chapter:

- recognise the contribution of the animal health sector to improving animal welfare outcomes through innovation and research;
- more clearly acknowledge the role of animals in research that supports the development and registration of veterinary medicines and animal health products;
- ensure identified opportunities are aligned with APVMA and other relevant regulatory requirements; and
- recognise the importance of international regulatory harmonisation initiatives, including VICH, in reducing unnecessary duplication of animal studies while maintaining high standards of animal welfare.

Livestock and production animals

AMA was disappointed not to have been included in targeted consultation regarding the *Livestock and production animals* chapter. The animal health sector provides a range of products that support good health and welfare in livestock, including pharmaceuticals, vaccines, parasiticides, pain relief etc. Preventing, treating and managing animal diseases, parasites and painful conditions is paramount to good animal welfare.

AMA broadly supports the opportunities and focus on improved transparency, collaboration and coordination outlined in the Chapter. However, AMA **recommends** that opportunities to stocktake existing industry activities, standards and guidelines are included in the first two opportunities to inform future prioritisation and coordination efforts.

Stakeholder engagement

AMA strongly supports the Strategy's emphasis on broad stakeholder engagement, transparent decision-making and nationally coordinated approaches. The Strategy appropriately identifies stakeholder engagement as a core element of nationally consistent policy development and standards-setting processes.

Given the diversity of sectors and expertise that contribute to animal welfare outcomes, AMA considers it essential that any individual policies, standards, regulations or initiatives developed under or informed by the Strategy include early, genuine and meaningful consultation with impacted industries and stakeholders.

This is particularly important where proposed measures may affect access to veterinary medicines, animal health innovation, research activities, livestock production systems, companion animal health or veterinary service delivery.

Meaningful stakeholder engagement is critical to ensuring that future policy proposals are practical, evidence- and science-based, proportionate and capable of achieving their intended animal welfare outcomes without creating unintended negative consequences.

In summary

AMA supports the development of a renewed Australian Animal Welfare Strategy and welcomes the opportunity to contribute to its development.

AMA encourages the Department to strengthen recognition of the relationship between animal health and animal welfare throughout the Strategy, ensure the *Animals involved in research and teaching* chapter appropriately reflects the animal health regulatory environment, and maintain strong consultation mechanisms with affected stakeholders as future initiatives are developed.

AMA welcomes continued engagement as the AAWS progresses.

Yours sincerely,

Dr Katie Asplin
Director Animal Health Policy & Engagement

[Unsigned for electronic submission]