

NATIONAL AQUACULTURE COUNCIL INC.



Committee Secretary
Senate Rural and Regional Affairs and Transport Committee
Department of the Senate
Parliament House
Canberra ACT 2600

Dear Sir/Madam

The National Aquaculture Council is the peak body representing the aquaculture industry across Australia. It appreciates the opportunity to provide comments on the provisions of the National Animal Welfare Bill 2005.

The Aquaculture industry has a recently developed and adopted an Animal Welfare Code of Practice supported by the Federal Government and many of its agencies.

The industry has always been cognizant of its responsibilities towards best practices and husbandry relating to animal welfare.

The aquaculture industry has not been consulted in the development of this Bill and has only recently been afforded the opportunity to provide comment. This submission is made in the context of not providing our constituents with sufficient time to provide comments that reflect their concerns on the proposed Bill.

The NAC will be advising Government to defer any further consideration of the Bill until adequate consultation and appropriate changes have been considered.

The NAC is closely cooperating in the implementation of the Australian Animal Welfare Strategy (AAWS) and is keen to see how this approach relates to the proposed Bill. At present there appears to be no relationship between either.

Authority and Inspectors

The NAC questions the need for the establishment of a Statutory Authority for Animal Welfare and in particular the power of such an Authority to appoint inspectors, most of which would have little experience or understanding of aquatic animal physiology and husbandry.

The NAC believes that the AAWS must play a role in considering the implications of the proposed Bill. The area of aquatic animal science in regard to animal welfare issues is very complex and any policy development requires considered opinion from those experienced in world best practice and an understanding of the science that relates to aquatic animal welfare.

Regulating Codes of Practice

It is impractical to regulate Codes of Practice. They are constantly changing to ensure they are in line or in with world best practice. This additional layer of proposed regulation flies in the face of the Government's proposal through the Action Agenda to lessen the regulatory burden on industry. There is a need for justifying the shift of the current arrangements to that of a highly regulated and expensive process. Industry would certainly not support what appears to be an expensive proposal to regulate the industry

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Live Export of Animals

This section could have serious implications for sectors of the seafood industry and careful consideration needs to be given to ensuring that provisions under existing legislation (e.g. AQIS Export provisions) are not encroached upon.

In essence the proposed Bill seems extremely cost inefficient and ineffective and very bureaucratic in its approach with increased regulation and costs being the major imposts on industry. It is likely that a number of industries could seriously suffer from the impracticality and unworkability of this Bill. The NAC and the industry it represents do not support the Bill.

If you require further information please contact the undersigned on 0262810383.

Yours faithfully



Simon Bennison

CC: Senator Ian Macdonald