

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

From:
Dede River, Trish Roberts
Queensland Group for Animal Rights (QGAR)
PO Box 1115
Paradise Pt, QLD 4216

RE: Provisions of the National Animal Welfare Bill 2003 and related matters

The Queensland Group for Animal Rights (QGAR) thanks you for the opportunity to comment on Sen Bartlett's private member bill, the National Animal Welfare Bill, 2005. We appreciate the intent and content of this Bill.

As an organisation, the basic position of QGAR is that animals are living beings, independent. They possess inherent worth which is ethically more important than their material utility for human purposes. They are intelligent, sensate, feel pain. We object to their use in any manner that compromises the quality of their lives, or which shortens their lives as a result of human actions or inaction.

We believe that those who continue to use members of sensate animal species as "property", or who abuse and kill animals in more natural environments, should be forbidden to do so. Until that happens, those allowed to own or kill animals should only be allowed to do so on the conditions of minimisation of any suffering that is imposed. Harm to animals as entertainment or sport should be strictly forbidden. Those who use animals for other purposes must be subject to the most stringent sort of "duty of care" regarding the animals they use.

Animal Industries

- In that regard, there should be codes of practice for animal industries.
- These codes should be ratified, and should be legally enforceable, rather than voluntary codes.
- Industry members should be inspected by independent examiners, regularly enough to ensure compliance.
- The establishment of these codes should include representatives of:
 - industry;
 - veterinary specialists;
 - animal welfare advocates;
 - community members; and
 - ethical specialists.
- The codes should be under continual refinement to ensure best practice in terms of the minimisation of animal suffering.
- The codes should govern all aspects of the animal life-cycle.

- The codes should work from the principle that optimal natural ecological conditions for the species should govern what is "least harmful" in terms of space, environment, social grouping, and so on.
- The fact that some animals are social, should not be used to justify overcrowding. "Natural" group sizes should be deemed "least harmful" in terms of social grouping in captivity.
- The fact that some animals are naturally solitary should not justify confinement or isolation in impression-poor environments.
- The use of intensive farming practices should be phased out. They are not consistent with the needs of animals.
- The use of feedlots should be reduced, because:
 - living in feedlots make animals more vulnerable to disease; and
 - feedlots are an inefficient use of food, which is unconscionable as long as there is hunger on the planet.
- Efforts should be made to ensure animals live under conditions healthy enough that they do not require administering antibiotics as a general practice to maintain health. Trace levels of antibiotics in meat from animals where antibiotics are routinely included in food or fluids causes major problems of resistance in humans, as well as in animals.
- The production of animal products other than meat should be restricted to by-products of the meat industry. Industries based on fur or byproducts from animals which are not eaten is unnecessary, and should be prevented.
- The import and export of live commercial animals should be highly regulated, because of the problems of disease transfer. Similar considerations apply to meat which may contain viable diseases, infections or parasites which may affect either humans or animals in Australia. In some cases, this may require restricting meat imports to meat that has been cooked, or treated in some manner.

Companion Animals

- Companion animals should be seen as exactly that. Confinement of any animal in ways that do not create the mutual pleasure and the interactions of companions should be considered imprisonment.
- While companion animals may need to be confined to the home or property of their human companion, the test of "companionship" should be that the animal chooses to associate with the person, when given the choice.
- Companion animals should be non-fertile. No commercial sale of fertile animals, to other than a registered breeder, should be allowed.
- Companion animals should be identifiable, in case of loss, and to trace abandoned animals. In the case of larger animals, this should be through a means like microchipping.
- Identification should be by standardised codes.
- The development of aggression in animals such as dogs, in order to use these animals for attack or security purposes, should be forbidden.

Animals used in Research

- No animals should ever be used in trivial testing. This includes testing of anything other than medication or treatment for serious diseases.
 - No testing of beauty products
 - No testing of food additives
 - No psychological or behavioural experimentation.

- No testing of OTC medications for problems like acne, hay fever, and other conditions that are transitory, not life-threatening or permanently debilitating.
- LD50 and similar tests should be avoided. They are often unnecessary.
- If necessary, potentially hazardous medication tested on animals should be used at levels similar to those used by humans, on a weight/dose basis. No testing extreme amounts.
- "Best practice" in terms of reduction of impacts of testing should be used: e.g. the use of tissue or cell culture rather than testing on animals.
- Where drugs are seen to have negative impacts on a subject animal, the dosage should be noticed, and the test stopped, rather than continuing while impacts worsen.
- Animals should be treated and/or rehabilitated after experiments and allowed to live out their lives without further experimentation.
- Labeling laws should include requirements for labels in relation to animal testing on any product which may test on animals. Information included should include whether testing was done (or caused to be done) and a rating of the impact of that testing on the animal (disability, death, etc).

Animals and Entertainment

- Killing for "sport", including sport hunting and fishing, should be forbidden.
- Use of animals as entertainment, or in entertainment, should be prohibited aside from use in films, books or graphics.
- Animals filmed or photographed should be protected from harm or abuse.
- No depiction of animals should be allowed where harm to the animal resulted from the act of depiction. An exception is where such depiction is for training or education purposes, and in that case, animals should not be harmed specifically for such purposes.

Specific points

- S 16 (1) states inspectors must have an understanding of animal husbandry. This could be seen as a requirement to have prior involvement in the animal production industry, and this may prove inappropriate.
- S 63 Duty of care, needs explicit provision for exercise and socialisation.
- S 65 Strays - only 20 penalty units

Thank you for the opportunity to respond to this Bill.

Regards
Dede River
Queensland Group for Animal Rights