

29 November 2005

Ms Roxane le Guen
Committee Secretary, Senate Rural and Regional Affairs and Transport Committee
Parliament House
CANBERRA ACT 2600

Dear Ms le Guen,

Inquiry into the National Animal Welfare Bill 2005

Australian Wool Innovation Limited (AWI) appreciates the opportunity to provide comments on the provisions of the National Animal Welfare Bill 2005.

By way of background, AWI has been a critical participant in the Australian Wool and Sheep Industry Taskforce, which has led the industry's response to the aggressive Australian wool boycott campaign waged by the US-based extremist animal rights group, People for the Ethical Treatment of Animals. The comments that follow reflect not only AWI's position on the Bill but I can confidently say reflect those of the industry at large.

AWI would like to confine its submission to three key facts in this debate.

Fact one AWI represent an industry worth more than \$2.2 billion per annum to the Australian economy and employs around 100,000 Australians – around 7 per cent of our total agricultural output.

Fact two Australia already has a world class system of animal welfare codes and standards at a federal and state level. These include a raft of State and Federal legislation and industry codes of practice. They are science-based and the result of extensive consultation with industry.

Fact three Industry has cooperated fully in the development and implementation of these measures. This collaborative approach has included:

- Working with Government to develop and implement the Australian Animal Welfare Strategy - supported by all governments and industry stakeholders and endorsed by the Primary Industries Ministerial Council in May 2004;
- Cooperating with the recent review of the Australian model codes of practice for the welfare of animals, completed by Geoff Neumann in 2005;
- Industry agreement to target the phase out of mulesing by 2010, along with investment by AWI of up to \$15 million in developing and trialling commercial alternatives.

The result of these measures has been sustained change in the industry and international recognition of our standards. Contrast this approach with the punitive and unworkable approach advocated by this Bill.

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1. The Bill will impose prison sentences of up to 1 year and 300 penalty points for mulesing (See Section 80 of the Bill)

The heavy handed approach advocated by this Bill is clearly unwarranted. It ignores the fact that sheep will die a painful death from the effects of fly strike by the aggressive, flesh eating maggots of *Lucilia cuprina*. The MacKinnon Project at Monash University projects that up to 3 million sheep could die in a bad blowfly year. To allow such a situation would simply be unconscionable from a woolgrower's perspective.

Contrary to the rhetoric of the animal rights movement, the fact is that there is no alternative to mulesing currently available.

The Department of Agriculture Fisheries and Forestry is well aware of industry's difficulties with this matter and bodies such as the Australian Veterinary Association, RSPCA and the Commonwealth's Chief Veterinary Officer all concede that mulesing is currently a necessary husbandry practice.

Industry has already agreed to phase out this practice, and has already allocated some \$15 million to ensure that commercially viable substitutes are available for industry by 2010. This punitive approach will undermine industry partnership with Government and jeopardise the lives of up to 3 million sheep from death from flystrike.

2. The Bill attempts to usher in a product labelling system that would greatly disadvantage Australian industry

This proposal again was the product of no consultation with industry experts. It remains unclear what costs would be passed on to industry from this unworkable proposal.

No rationale is provided, nor any market analysis to assess the impact of this proposal for exporters and the industry. Clear and defined standards are also absent from the proposal.

3. The Bill will see unnecessary and costly regulations imposed on industry

The Bill provides for the establishment of a National Animal Welfare Authority, with limited industry representation. While only two members of this authority would be representatives of industry, five representatives would be from animal welfare/rights groups.

The Authority would also have a punitive impact on the wool industry. Its mission would include:

- Appointing animal welfare inspectors with far reaching powers to enter property undertake random searches, seize live stock and property and issue directions to producers. Warrants for these invasive searches could be obtained from a local Justice of the Peace;
- Granting licences to animal researchers and taking steps to ensure that unlicensed operators are driven out of the market;
- Enforcing, by law, existing industry codes of practice and drafting new codes without further consultation with industry;

The Bill will also further restrict Government funding for research into animals (see section 117) – and will also restrict industry led research into better and more humane treatment of animals in its care.

There has been no attempt by the proponents of the Bill to assess the considerable financial impact of this heavily regulated approach.

It should be noted that the Bill was tabled in Parliament before any real consultation with industry occurred. Unlike industry-led Codes of Practice, this is a bill owned and drafted by opponents of our industry, the animal rights movement.

AWI believes that sustained change in industry standards will only occur through cooperation and consultation – a partnership with government.

Thank you again for this opportunity to contribute to this Inquiry. Should you need further assistance on this matter, please do not hesitate to contact me on (02) 9299 5155.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Len Stephens', with a long horizontal flourish extending to the right.

Dr Len Stephens
Chief Executive Officer