

**Inquiry into the Animal Care and Protection Amendment Bill 2022**

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<b>Submitted by:</b>	Animal Welfare League Qld
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<b>Submitter Comments:</b>	



HON. MICHAEL KIRBY AC, CMG



ITA BUTTROSE AC, OBE

**AWLQ HEAD OFFICE**

Shelter Road  
COOMBABAH QLD 4216

PO Box 3253  
HELENSVALE TOWN CENTRE QLD 4212  
07 5509 9000  
info@awlqld.com.au

ABN 75 521 498 584

**AWLQ ANIMAL  
REHOMING CENTRES****Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5509 9000  
goldcoastrehomeing@awlqld.com.au

**Beenleigh**

Rossmans Road  
STAPYLTON QLD 4207  
07 3807 3782  
beenleighrehomeing@awlqld.com.au

**Warra**

523 Telegraph Road  
BRACKEN RIDGE QLD 4018  
07 3631 6800  
warra@awlqld.com.au

**Willawong**

501 Gooderham Road  
WILLAWONG QLD 4110  
07 3714 2800  
willawongshelter@awlqld.com.au

**AWLQ COMMUNITY  
VET CLINICS****Brisbane**

6/10 Old Chatswood Road  
DAISY HILL QLD 4127  
07 3808 2892  
brisbanevetclinic@awlqld.com.au

**Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5594 0111  
goldcoastvetclinic@awlqld.com.au

**Ipswich**

42 Tiger Street  
WEST IPSWICH QLD 4305  
07 3812 7533  
ipswichvetclinic@awlqld.com.au



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30<sup>th</sup> May 2022

Dr Chris Whiting MP  
Chair State Development and Regional Industries Committee  
Parliament House  
George St  
Brisbane Qld 4000  
Email: [SDRIC@parliament.qld.gov.au](mailto:SDRIC@parliament.qld.gov.au)

Dear Mr Whiting

**Animal Welfare League Qld**  
**Submission regarding the Animal Care and Protection Amendment Bill 2022**

Thank you for the opportunity to provide this submission.

As the second largest animal welfare organisation in Queensland, Animal Welfare League Qld takes a strong interest in the care and protection of all animals. We directly care for approximately 10 000 stray and abandoned animals each year and are leaders in initiatives to prevent stray and surrendered companion animals and improve their quality of life of all animals. However, our Board, staff and volunteers are committed to improved animal welfare generally across all species of animals.

We therefore firstly wish to express our deep disappointment that the Bill for the updating of the ACPA and the Discussion Paper that preceded the Bill, are not more progressive.

We do not support the narrow and short-sighted confines of the current Bill. While we appreciate strengthening of enforcement powers, prohibiting inhumane practices, monitoring the slaughter of horses, and more oversight of retired horses, the broader recognition of the sentience of animals and its implications for how we use all animals is overdue and should be part of this revision. Many of the changes are minor procedural amendments designed to make uses of animals more convenient, and more profitable for farmers to sell in international markets, and scientists to save on costs and compete internationally, and easier and less troublesome for the government. These changes have nothing to do with improving animal welfare. We find this extremely disappointing.

Please see below the areas we support and our concerns in relation to each section of the Bill:

**Facilitating the ethical use of animals for scientific purposes**

We support some of the practical elements such as:

- Enabling the term of scientific use registration to be a maximum of four rather than three years
- Requiring a registration holder to notify changes etc
- However, allowing persons other than vet surgeons to perform acts of veterinary science on animals used for scientific purposes is a change for convenience and cost-saving – it does not improve the welfare of animals.







HON. MICHAEL KIRBY AC, CMG



ITA BUTTROSE AC, OBE

**AWLQ HEAD OFFICE**

Shelter Road  
COOMBABAH QLD 4216

PO Box 3253  
HELENSVALE TOWN CENTRE QLD 4212  
07 5509 9000  
info@awlqld.com.au

ABN 75 521 498 584

**AWLQ ANIMAL  
REHOMING CENTRES****Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5509 9000  
goldcoastrehoming@awlqld.com.au

**Beenleigh**

Rossmans Road  
STAPYLTON QLD 4207  
07 3807 3782  
beenleighrehoming@awlqld.com.au

**Warra**

523 Telegraph Road  
BRACKEN RIDGE QLD 4018  
07 3631 6800  
warrashelter@awlqld.com.au

**Willawong**

501 Gooderham Road  
WILLAWONG QLD 4110  
07 3714 2800  
willawongshelter@awlqld.com.au

**AWLQ COMMUNITY  
VET CLINICS****Brisbane**

6/10 Old Chatswood Road  
DAISY HILL QLD 4127  
07 3808 2892  
brisbanevetclinic@awlqld.com.au

**Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5594 0111  
goldcoastvetclinic@awlqld.com.au

**Ipswich**

42 Tiger Street  
WEST IPSWICH QLD 4305  
07 3812 7533  
ipswichvetclinic@awlqld.com.au

- To improve the welfare of animals used for scientific purposes, we want the Act to require each institution which has animal use registration holders to be required to increase the development and use of replacement technology and reduce animal use with fewer numbers each year by all animal registration holders. This aligns with the supposed intention of the legislation to Reduce Replace and Refine, rather than have an overall increase in the use of animals. European countries are phasing out animal use and a modern ACPA based on science and community expectation should be doing the same.

**Strengthening enforcement powers****We agree with:**

- Inclusion of a breach of duty of care through gross neglect i.e. omission to feed, provide water or treat an animal in their care.
- Allowing an inspector to enter a property to provide relief to an animal from adverse weather or another animal that is aggressive
- Allowing alignment with interstate law
- Enabling an inspector to give a direction to someone under a compulsory code
- Requiring a vet certificate for people who acquire an animal with a docked tail
- Making it illegal to not restrain your dog in a vehicle.

**We believe there needs to be greater clarification of unreasonable abandonment, particularly in relation to the care of domestic cats whether they be owned, semi-owned or unowned.**

This requires two changes to the ACPA, as follows:

- Domestic cats (whether owned, semi-owned or unowned) need to be defined separately from feral cats in the ACPA, the Animal Management (Cats and Dogs) Act 2008 and the Biosecurity Act 2014, as they can and should be managed differently, for effectiveness in preventing breeding and predation, and on animal welfare grounds. The definitions we support are stated in the G2Z Australian Cat Action Plan, aligned with those in RSPCA Australia's Best Practice in Domestic Cat Management and largely aligned with the Federal Government's Threat Abatement Plan i.e.:
  - Domestic cats: cats with some dependence (direct or indirect) on humans. There are three sub-categories of domestic cats - owned, semi-owned, or unowned community cats:
    - Owned cats:** cats identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable although sociability varies depending on parenting, previous experience, current owners' interaction and environment. They include:
      - Responsibly owned cats:** cats who have a close relationship with humans, are identified with a microchip, registration tag and/or collar and address tag, kept safely confined in a house or yard, and have physical and mental health needs addressed. They are desexed unless kept for breeding.



## AWLQ PATRONS



HON. MICHAEL KIRBY AC, CMG



ITA BUTTROSE AC, OBE

## AWLQ HEAD OFFICE

Shelter Road  
COOMBABAH QLD 4216

PO Box 3253  
HELENSVALE TOWN CENTRE QLD 4212  
07 5509 9000  
info@awlqld.com.au

ABN 75 521 498 584

AWLQ ANIMAL  
REHOMING CENTRES

## Gold Coast

Shelter Road  
COOMBABAH QLD 4216  
07 5509 9000  
goldcoastrehomeing@awlqld.com.au

## Beenleigh

Rossmans Road  
STAPYLTON QLD 4207  
07 3807 3782  
beenleighrehomeing@awlqld.com.au

## Warra

523 Telegraph Road  
BRACKEN RIDGE QLD 4018  
07 3631 6800  
warrashelter@awlqld.com.au

## Willawong

501 Gooderham Road  
WILLAWONG QLD 4110  
07 3714 2800  
willawongshelter@awlqld.com.au

AWLQ COMMUNITY  
VET CLINICS

## Brisbane

6/10 Old Chatswood Road  
DAISY HILL QLD 4127  
07 3808 2892  
brisbanevetclinic@awlqld.com.au

## Gold Coast

Shelter Road  
COOMBABAH QLD 4216  
07 5594 0111  
goldcoastvetclinic@awlqld.com.au

## Ipswich

42 Tiger Street  
WEST IPSWICH QLD 4305  
07 3812 7533  
ipswichvetclinic@awlqld.com.au

AWLQLD.COM.AU



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- **Casually owned cats:** cats whose carers consider the cat their own, but who may not be desexed, identified or kept confined to the owner's yard, due to such factors as owners' personal beliefs, lifestyle, organisational skills, financial circumstances or lack of knowledge.
- **Semi-owned cats:** cats fed or provided with other care by people who do not consider they own them. They are of varying sociability with many socialised to humans.  
  
These cats may be owned by someone else, and choose to visit other households, or they may have been lost or abandoned or born to lost or abandoned cats.
- **Unowned cats:** cats who have indirect dependence on humans and/or casual and temporary interactions with humans. They have varying sociability, including some who are unsocialised to humans, and may live in groups.  
  
They may have been owned and abandoned or lost, or may be the progeny of straying owned, semi-owned or unowned cats with little human contact and dependence. They may live in a group of cats in areas in cities/towns where they scavenge food or are fed by community carers e.g. in parks, school/university grounds, factory areas, shopping complexes.
- **Feral cats:** cats who are unowned, unsocialised, have no relationship with or dependence on humans, and live and reproduce in the wild (e.g. in forests, grasslands, deserts)
- **Stray cats:** cats who wander (straying refers to the activity of wandering away, not an ownership status) Stray cats may be responsibly owned and temporarily escape from their yard (e.g. a gate or door left open), casually owned and wander from their yard regularly (e.g. due to inappropriate fencing), and/or semi-owned (e.g. cats making regular visits to one or more households who do not own them, but who may be currently owned, or lost or abandoned). Stray cats may also be born to previously owned cats and live in colonies, directly or indirectly being fed by humans.

Many municipalities around Australia consider cats and dogs to be "stray" once they leave the confines of their owner's property.<sup>4</sup> They may be collected by an animal management officer or member of the public and handed in to a pound or shelter. There is usually a holding period to determine if the cat has been socialised, and to locate the owners and return the cat, or give owners an opportunity to collect the cat. If the owner is not found during the holding period, cats may be desexed, identified and rehomed; or desexed, identified to a shelter, rescue group, or carer and returned to where they were captured, so they may return to their home themselves, but no longer breed. Numerous studies have shown that cats are 10-50 times more likely to be reunited with their owner, if they are NOT impounded.

The Australian Government has already recognised the need to distinguish between domestic (owned and unowned) cats, and feral cats. It recently created a Domestic Cat Management Taskforce to work on separate strategies for addressing



**AWLQ PATRONS****HON. MICHAEL KIRBY AC, CMG****ITA BUTTROSE AC, OBE****AWLQ HEAD OFFICE**

Shelter Road  
COOMBABAH QLD 4216

PO Box 3253  
HELENSVALE TOWN CENTRE QLD 4212  
07 5509 9000  
info@awlqld.com.au

ABN 75 521 498 584

**AWLQ ANIMAL REHOMING CENTRES****Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5509 9000  
goldcoastrehoming@awlqld.com.au

**Beenleigh**

Rossmans Road  
STAPYLTON QLD 4207  
07 3807 3782  
beenleighrehoming@awlqld.com.au

**Warra**

523 Telegraph Road  
BRACKEN RIDGE QLD 4018  
07 3631 6800  
warrashelter@awlqld.com.au

**Willawong**

501 Gooderham Road  
WILLAWONG QLD 4110  
07 3714 2800  
willawongshelter@awlqld.com.au

**AWLQ COMMUNITY VET CLINICS****Brisbane**

6/10 Old Chatswood Road  
DAISY HILL QLD 4127  
07 3808 2892  
brisbanevetclinic@awlqld.com.au

**Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5594 0111  
goldcoastvetclinic@awlqld.com.au

**Ipswich**

42 Tiger Street  
WEST IPSWICH QLD 4305  
07 3812 7533  
ipswichvetclinic@awlqld.com.au

**AWLQLD.COM.AU**

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predation by domestic cats (owner, semi-owned and unowned) in populated areas of cities and towns and rural shires, as distinct from feral animals which have no human dependence and live in remote areas.

2. There is a need for clarification that caring for the welfare of domestic unowned cats who are directly or indirectly, dependent on humans for food and care, by desexing them and returning them to where they live, is not abandonment. Most urban and suburban domestic cats survive very well and are healthy. However, they breed quickly and so if numbers are to be contained and reduced, desexing is the most welfare-oriented solution as it enables cats to live and experience well-being, and prevents further breeding. Under the Biosecurity Act, domestic cats that are directly or indirectly dependent on humans for food, should be able to be returned to where they live, provided they are living in areas where they are not causing permanent harm/damage to native wildlife populations. Some suggestions of how this could be done are below:

**First option:**

- section 19 is amended to provide that abandonment does not include desexing and return of domestic cats to where they live, provided they are healthy and directly or indirectly dependent on humans for food, and are monitored to ensure they are not impacting negatively on native animal populations.

Trapping existing undesexed cats living directly or indirectly with humans, and returning them, is not abandonment, if they were living independent healthy lives in the first place. They are being desexed to enable them to live out their days without further breeding to prevent reduction in numbers over time, and permanent prevention of nuisance and wildlife predation. This protects the welfare of cats whilst also preventing an increase in impacts of cats on people and wildlife.

**Second option:**

- section 19 is amended to provide that desexing and returning cats to where they live with direct or indirect support from humans is a 'reasonable excuse'

"Reasonable excuse" can be argued on both management and welfare grounds:

There are currently many cats in cities and towns, who have escaped, got lost, have been abandoned or are the progeny of a cat that has escaped, been lost, or abandoned, or of a wandering owned undesexed cat.

Doing nothing (a common strategy due to the extent of the problem and the cost of management) means that the numbers of cats living in cities and towns will continue to expand which will be more detrimental to the welfare of people, cats and wildlife.

Trapping and killing has been a typical response by some local governments, which has been unsuccessful as it lacks long term impacts and is not aligned with compassion. Because it is embedded in the brain structure of normal people to





HON. MICHAEL KIRBY AC, CMG



ITA BUTTROSE AC, OBE

**AWLQ HEAD OFFICE**

Shelter Road  
COOMBABAH QLD 4216

PO Box 3253  
HELENSVALE TOWN CENTRE QLD 4212  
07 5509 9000  
info@awlqld.com.au

ABN 75 521 498 584

**AWLQ ANIMAL  
REHOMING CENTRES****Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5509 9000  
goldcoastrehomeing@awlqld.com.au

**Beenleigh**

Rossmans Road  
STAPYLTON QLD 4207  
07 3807 3782  
beenleighrehomeing@awlqld.com.au

**Warra**

523 Telegraph Road  
BRACKEN RIDGE QLD 4018  
07 3631 6800  
warrashelter@awlqld.com.au

**Willawong**

501 Gooderham Road  
WILLAWONG QLD 4110  
07 3714 2800  
willawongshelter@awlqld.com.au

**AWLQ COMMUNITY  
VET CLINICS****Brisbane**

6/10 Old Chatswood Road  
DAISY HILL QLD 4127  
07 3808 2892  
brisbanevetclinic@awlqld.com.au

**Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5594 0111  
goldcoastvetclinic@awlqld.com.au

**Ipswich**

42 Tiger Street  
WEST IPSWICH QLD 4305  
07 3812 7533  
ipswichvetclinic@awlqld.com.au



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want to survive and show empathy for other's survival, by avoiding harm to other life, and protecting it where possible, compassionate people will work to find ways to protect cats and wildlife. Trapping and killing cats, many of whom may be wandering pets or progeny of pets who wandered or were lost, is a traumatic experience for the cat and causes harm (Even though the ACPA doesn't recognise death as a harm, ethically it is a harm as cats seek survival, fear death and if killed, never experience the fulfillment and pleasure of their lives. It cannot be considered reasonable to deliberately take a healthy cat from its environment and kill it, when cats are part of our families and their presence living in an unowned state is a failure of human behaviour. Cats were introduced to control introduced species that impact negatively on humans. Humans are the greatest nuisance/threat to native species through their daily living, breeding and excessive use of resources – clearing habitat, polluting water, poisoning and depleting soil, etc. so stopping the decline of native species is multi-faceted and requires sacrifices by humans as well as managing cats as compassionately as possible whilst preventing further breeding.

The most effective action aligned with welfare, is to desex the cats to prevent further breeding, and for their welfare and the welfare of those who care about animals, rehome them whenever possible. However, some cats are terrified and suffer both physical and mental trauma by even short confinement, and to gradually socialise them, means they face the stress of lengthy confinement, neither of which is acceptable under the ACPA i.e. regarded as cruel). Some unsocialised cats, if kept in confinement to be socialised, may be permanently confined and may never get a home, as there are still too many other socialised cats needing homes. For their welfare, some healthy unsocialised cats, are best put back to where they live. As these cats are fed directly or indirectly by humans in urbanized areas, predation on native wildlife is limited and is more likely to be on introduced species. Identification and prohibition of cat return in areas where threatened wildlife species will not survive and oversight by local governments can ensure that these areas are protected.

Desexing and rehoming where possible or returning these cats with monitoring and support in locations where native species are not likely to be heavily impacted, has been shown to produce long-term reductions in cat numbers, whilst maintaining animal welfare. Research has shown that the majority of people do not want cats killed, so are reluctant to contact local government if this outcome is likely. By allowing desexing and returning with support, people are willing to cooperate with government authorities, and provide support with desexing, feeding and monitoring of cats. While the cats are supported in their original territory, they are preventing an influx from nearby cat colonies and even more breeding due to the vacuum left where there is a food supply and no other cats.

**Third option:**

- Amend the Act and Regulation:
- section 19 of the Act is amended to provide that the Regulations may prescribe circumstances which do not constitute abandonment, or which constitute a reasonable excuse, and
- the Regulation is amended to set out one of the options noted above.







HON. MICHAEL KIRBY AC, CMG



ITA BUTTROSE AC, OBE

**AWLQ HEAD OFFICE**

Shelter Road  
COOMBABAH QLD 4216

PO Box 3253  
HELENSVALE TOWN CENTRE QLD 4212  
07 5509 9000  
info@awlqld.com.au

ABN 75 521 498 584

**AWLQ ANIMAL  
REHOMING CENTRES****Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5509 9000  
goldcoastrehomeing@awlqld.com.au

**Beenleigh**

Rossmans Road  
STAPYLTON QLD 4207  
07 3807 3782  
beenleighrehomeing@awlqld.com.au

**Warra**

523 Telegraph Road  
BRACKEN RIDGE QLD 4018  
07 3631 6800  
warrashelter@awlqld.com.au

**Willawong**

501 Gooderham Road  
WILLAWONG QLD 4110  
07 3714 2800  
willawongshelter@awlqld.com.au

**AWLQ COMMUNITY  
VET CLINICS****Brisbane**

6/10 Old Chatswood Road  
DAISY HILL QLD 4127  
07 3808 2892  
brisbanevetclinic@awlqld.com.au

**Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5594 0111  
goldcoastvetclinic@awlqld.com.au

**Ipswich**

42 Tiger Street  
WEST IPSWICH QLD 4305  
07 3812 7533  
ipswichvetclinic@awlqld.com.au

Any of the above three options would ensure cat management could be aligned with better welfare for all involved and community expectations for best treatment of both cats and wildlife.

**Prohibiting Inhumane practices**

- We support prohibiting inhumane practices, such as the firing or blistering of the legs of dogs or horses, the use of prong collars, prohibited netting, and the use of CSSP pig poison on pest animals. However other poisons should also be banned e.g. 1080 and the uptake of less harmful preventative strategies to protect domestic animals be encouraged and supported by government.

**Approved cattle procedures accreditation scheme**

- We do not agree that amending the ACPA to allow the chief executive to approve cattle procedures accreditation schemes will necessarily improve animal welfare. Once again this is a change for practicality and cost-saving rather than animal care and protection.

**Clarify and remove any redundant provisions**

- We agree that Codes of Practice are to be based on scientific knowledge. There is overwhelming evidence that animals are sentient, and humans should be responsible for providing environments where all animals can express normal behaviours ie. room to move, play, socialise in appropriately sized groups to enable well-being. We therefore believe there should be recognition of sentience in the Bill. The Victorian review of its equivalent Act has been supported by the community to recognise sentience, as well as other countries such as New Zealand.
- Recognising sentience of all animals means that the Bill should address inconsistencies in the Act between the treatment of animals that are considered companions and the treatment of animals used for farming, scientific research, and entertainment and in wildlife management. i.e. requiring phasing out of intensive farming practices (similar and equally as important as transitioning from polluting industries by helping coal workers to move into new clean energy industries); requiring evidence from all universities and institutions using animals in research of development and use of replacement techniques and phasing out use of animals in research; and requiring phasing out of poisons and replacement with management methods such as guardian dogs, dingoes and fencing to protect crops and domestic animals from wild animals. Government incentive funding should be used to guide and support these transitions.
- We agree with the inclusion of all Cephalopoda in the Act under the definition of animals. However, we would like to see inclusion of some Malacostraca such as crabs, crayfish, lobsters, and prawns, in line with modern animal welfare science.
- The Bill should prohibit rodeos, as rodeo activities are currently based on rough handling. The scientific evidence is clear, and on government websites, that all animals should be treated with calm handling.
- As a minimum, calf roping must be prohibited, as it involves rough handling of young vulnerable animals. The removal of the section on animals not being





HON. MICHAEL KIRBY AC, CMG



ITA BUTTROSE AC, OBE

**AWLQ HEAD OFFICE**

Shelter Road  
COOMBABAH QLD 4216

PO Box 3253  
HELENSVALE TOWN CENTRE QLD 4212  
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info@awlqld.com.au

ABN 75 521 498 584

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REHOMING CENTRES****Gold Coast**

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COOMBABAH QLD 4216  
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goldcoastrehoming@awlqld.com.au

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STAPYLTON QLD 4207  
07 3807 3782  
beenleighrehoming@awlqld.com.au

**Warra**

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BRACKEN RIDGE QLD 4018  
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warrashelter@awlqld.com.au

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07 3714 2800  
willawongshelter@awlqld.com.au

**AWLQ COMMUNITY  
VET CLINICS****Brisbane**

6/10 Old Chatswood Road  
DAISY HILL QLD 4127  
07 3808 2892  
brisbanevetclinic@awlqld.com.au

**Gold Coast**

Shelter Road  
COOMBABAH QLD 4216  
07 5594 0111  
goldcoastvetclinic@awlqld.com.au

**Ipswich**

42 Tiger Street  
WEST IPSWICH QLD 4305  
07 3812 7533  
ipswichvetclinic@awlqld.com.au

able to be thrown when clearly this is what is happening to calves in rodeos at every rodeo event is hypocritical and lacks integrity.

- We agree with providing an offence exemption for vets to euthanize severely sick or injured animals if owners cannot be notified

**Martin Inquiry recommendations**

- While the requirement for closed circuit television equipment, inspectors' power of entry to abattoirs, and advance notification of horse killing may be helpful to improve slaughtering practices of horses, this should not be limited to abattoirs that are killing horses, but extended to all abattoirs to monitor care of all animal slaughter to deter mistreatment. Once again as other animals are also sentient, it is not a scientific approach to only monitor the slaughter of horses.
- We agree with the QRIC checking on the welfare of retired racehorses, and imposing reporting obligations on suppliers to and owners of livestock slaughter facilities. However, suppliers should have to report the origin of the horses they supply to slaughter facilities, and racehorse owners and breeders should be required to provide whole of life tracking of horses from breeding to death, to the QRIC with transparency to the public through QRIC reports. The current lack of transparency in whole of life tracing also needs to be addressed in greyhound racing.

**Queensland Audit Office Recommendations**

- An independent oversight of recommendations from inspectors is required, separate from the chief executive, as the chief executive is also responsible for DAF's goals to "create value for Queensland by connecting industries, the community and government to grow the economy". It is evident that some government officers may overlook animal welfare issues in order to support industry e.g. Federal Government officers ignored veterinary advice regarding cruel conditions on live export ships and fired the vet when the facts were inadvertently revealed. An Independent Office for Animal Care and Protection separate from the Department of Agriculture and Fisheries would achieve this.

We look forward to the opportunity for further input into the Committee's deliberations.

Kind regards

Dr Joy Verrinder PhD BA DipT MBA MA(Professional Ethics and Governance)

Strategic Director

Animal Welfare League of Qld (AWLQ)

[jverrinder@awlqld.com.au](mailto:jverrinder@awlqld.com.au)

[www.awlqld.com.au](http://www.awlqld.com.au) [www.ndn.com.au](http://www.ndn.com.au) [www.g2z.org.au](http://www.g2z.org.au)