

Inquiry into the Animal Care and Protection Amendment Bill 2022

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June 1st 2022

Dear Minister,

Re: ANIMAL CARE AND PROTECTION AMENDMENT BILL 2022

I am writing on behalf of Beagle Freedom Australia, a not-for profit organisation specialising in the rehabilitation and rehoming of ex-research animals, specifically beagles, other dog breeds and cats.

Beagle Freedom Australia was established in 2005 as Beagle Rescue Victoria. We eventually began rescuing beagles from research facilities across Australia and so launched Beagle Freedom Australia (BFA) in 2013 to cater specifically for this purpose. At BFA we take in any animal that has been used for medical research and find them a family home. We've rehomed hundreds of dogs and cats and we have a 100% success rate; every single animal has been able to be acclimated to a home environment. We provide extensive veterinary care for the animals we take in, we continue to provide this care for the life of each animal, should the adoptive family require the ongoing support, including medical and/or behavioural.

In conjunction with the launch of BFA in 2013, we launched the campaign 'Right to Release' which calls for the mandatory release of research animals at the end of their 'use' in research for the purpose of rehoming.

In 2018 we worked in conjunction with Bio-security at what was then known as DETJR (VIC) to develop a rehoming guideline document that was then published and sent to all the registered AEC's as a 'best practice' guide to follow. It opened some doors, but rehoming remains a voluntary practice in VIC.

Earlier this year, the Victorian Taskforce for Rehoming Pets put forward a report detailing multiple suggestions to improve the lives of pets in Victoria. 2 of those recommendations came directly from our proposal, 1 being the mandatory release of animals from research and teaching, for the purpose of rehoming and 2 being a retirement age for animals used in research and teaching. On May 31st, the Victorian government released their response to this report, supporting both of these suggestions as well as others. We write to you here to discuss these same 2 suggestions in the hopes that common sense will prevail and the QLD government will follow suit.

In our submission we will be addressing one key point which is outlined in the following pages. Our focus is on the work we do every day with dogs and cats used in research and teaching in Australia.

KEY POINT: Facilitating the ethical use of animals for scientific purposes while ensuring that animal welfare is not compromised;

The ethics surrounding the use of animals in medical research is a long argued debate. Dogs and cats have the capacity to experience feelings and emotions, they are sentient, but cannot consent to being the subject of medical research. Therefore it can easily be argued that it is unethical to use them as such.

Breeding of animals for research; The ability to set behaviour patterns and life long habits in dogs, occurs from birth through the first 12 months of age. Without controlled purpose breeding, and adequate time allocated during specific times of development, to ensure animals are set up to cope in a facility environment, the manifestation of many 'undesirable' behaviours in facility animals is often seen as a result. Currently, young animals are not being set up successfully to cope with the demands and routines of facility life.

The level of skill and constant dedication needed to control and avoid potential negative associations being made, and maintain a position of neutral or positive association to life's stimulus is imperative, but does not seem to be occurring. The guidelines and 'checklist exercises' set forth by facilities are not enough to ensure young animals will be successfully set up to cope in these unique environments.

Recommendations: All staff must have high base knowledge, constant up skilling provided by research organisations and be given adequate time and resources to ensure the desired behavioural patterns are set during critical life stages. Prior learning therefore does not become an influencing factor in the manifestation of undesirable behaviour. If this can't be achieved, then the facility must not participate in any internal breeding programs.

Use of animals for research; The minimum standards set out in the current governing codes of practice are not enough and need to be addressed. Below sets out recommendations in some key areas of animal welfare within research and teaching facilities.

Staff to animal ratio - Animal handlers / kennel hands have the key responsibility to exercise and clean up after the cats and dogs as well as provide them with enrichment. There are often not enough staff to sufficiently meet the needs of the number of animals being kept.

Recommendations: The staff to animal ratio needs to be regulated and enforced. We recommend 1 staff to every 15 dogs or cats (pups and kittens 2 =1). Facilities need to hire a greater number of staff and the correctly qualified staff. Staff numbers need to be consistent IE. The same amount of staff on weekends as is on weekdays. If they can't, for whatever reason achieve this, then they must reconsider how many animals they can adequately house at their site.

Enrichment - While a minimum standard exists for animal enrichment, and there are recommendations of what to provide, it is not enforced or regulated and as a consequence, it is not always delivered. When there is a lack of staff, enrichment programs are the first to be cut out or dropped from the daily routines. Staff are performing the recommended 'checklist exercises' but the animals are still not leading an enriched life.

In many facilities there are no enrichment programs. A lack of enrichment for dogs leads to behavioural issues such as pica, spinning / circling, chewing bars, barking, fighting and withdrawn behaviour, just to name a few. Similarly to the institutionalised dogs seen in intensive breeding farms.

Recommendations: Facilities must employ a minimum of 2 enrichment officers with a qualification in animal behaviour. It should be the job of the AEC to overlook the enrichment programs and ensure they are being implemented. Regular reports should be made and the AEC held accountable. Yearly enrichment education must be provided to the research facilities and their staff. Again, all staff must have a high base knowledge, constant up skilling needs to be provided by the research organisations. Animal welfare is an evolving space and the staff skills should be reflective of this.

Housing - Many facilities have large colonies of both dogs and cats. They are housed in a variety group pens, individual pens, cat cages/containers etc. In our experience, a large portion of medical issues we see in dogs released from research facilities comes from the way they are housed. Issues include pressure sores, fight wounds, persistent ear infections, straining or tearing of ligaments.

Dogs often get nothing soft to sit on and so pressure sores develop quickly and can be a source of ongoing discomfort and infection.

Recommendations: Fresh, soft bedding to be supplied for dogs and cats within their pens and runs. Adequate staff ratios would ensure that medications are administered promptly and persistent issues such as ear infections/mites can be brought under control.

Retirement age - A retirement age does not exist in any code of practice or guideline to our knowledge. A beagle's average lifespan is approx 12-15 years. On average the dogs we have taken in from medical research have been aged 10 and older, with the oldest being just over 14 years of age. We are also seeing geriatric animals used for breeding up to 11 years of age. Whilst it's great that we are able to provide an amazing end of life care for these dogs, its exactly that - end of life care. Not a second chance at a quality life after research.

Rehoming opportunities for older dogs can sometimes be limited, at BFA we cover the costs of ongoing medical treatments for some of our older animals - for life. Their rehoming opportunities are then broadened as we take away some of the financial burden of medical costs for the new families.

Age also plays a part in how quickly a dog or cat can be rehabilitated and adapt to a new environment. Whilst they can all adapt regardless of age, the time it takes is generally faster, the younger the animal is.

Recommendations: For both breeding animals and animals used for research, a mandatory retirement age of 6 years or 5 whelping cycles (for breeding animals) needs to be implemented. This gives the average dog roughly 6 years life expectancy once released for rehoming. It gives them at least half their life left to live as a family member (longer for cats). It will mean they can adapt to their new life faster, it will also give them more rehoming opportunities.

Rehoming policies;

Internal rehoming: We are often contacted by members of the public seeking our help and support after having adopted an ex-research animal through a work friend or family member. They are usually unprepared for the animal they've received and have had nowhere else to turn for help - Our dog is terrified of my husband, my cat is hiding and won't come out - and so on. These animals are at high risk of being surrendered to pounds and shelters, they get passed around, offered for free online, or they simply get put to sleep for being 'too difficult'.

We have also had dealings with facilities who seek our advice for rehoming. While our preference is that the animals are released into our care so that we can use our many years of experience to safely rehome them, to maintain relationships with facilities, we have provided advice on what to look for in a new home should they want to do the rehoming themselves.

External rehoming - There are four documents that we are aware of that refer to and are relevant to animals used for research and teaching in QLD:

- Veterinary Surgeons Act 1936 - No mention of rehoming.
- Animal Care and Protection Act 2001 - No mention of rehoming.
- The Australian Code of Practice for the Care and Use of Animals for Scientific Purposes 2013 addresses the rehoming of animals at point 3.4.2.

Opportunities to rehome animals should be considered wherever possible, especially when the impact of the project or activity on the wellbeing of the animal has been minimal and their physiological condition and behavioural attributes indicate that they can be introduced to a new environment with minimal, transient impact on their wellbeing.

Currently, the sensitive nature of each release we at BFA secure, is imperative to future releases taking place. These relationships can take many years of negotiations to build. Trust and a good working relationship with a facility is the only way to get animals released. If that confidence were to be broken in any way, it would shut down further releases and risk the safety of other animals still housed at the facilities.

Recommendations: The first step we would like to see is a provision made the Amendment Bill to make the rehoming of animals used in research and teaching mandatory. Regardless of age, illness or disability. Taking away the need for negotiations that can take months and even years to establish. Securing the safe release of thousands of animals.

We recommend that the release of facility animals is done only to reputable, experienced, well established rescue groups that are also registered with the ACNC. The rehoming of dogs and cats for a successful and permanent placement is a complex and ongoing responsibility. While there are many willing and capable homes and families out there, not everyone is suited to a dog or cat that has come from a research background. Rescue groups are experienced at finding homes and know exactly how to best find the most suitable home for each individual animal in their care. They provide ongoing support should there be any training or behaviour difficulties for the life of the animal. However, as per any industry, there are experienced groups and not so experienced groups. A database of reputable groups could be made available to assist research facilities, via the AECs.

Currently BFA are one of the few groups rehoming animals from research. BFA would be interested in helping to build a list of reputable groups or develop a code of standards to help groups become qualified to be considered for the rehoming of research animals. Animals from research should not be released to a pound or shelter. While they do great work, they don't run the checks or provide the support that a rescue group or community foster care network (CFCN) can provide. These last for the lifetime of the animal. Pounds and shelters also use a temperament testing system that is outdated and many institutionalised animals would fail it resulting in their deaths at the pound/shelter.

We recommend that temperament testing within facilities should be conducted by the rescue group that is taking the animal on and not by the facility staff. Currently they often use the same systems as the pounds and shelters which, mentioned above, are outdated and they often do not pass and are culled. Facility staff are not trained or experienced with the rehoming of animals, temperaments can and do change in different situations, the best qualified people are the ones doing the rehoming.

Emphasis should be put on pairing with a reputable rescue group for rehoming purposes.

The adequacy of the current regulatory regime regarding the use of animals in medical research, particularly in relation to transparency;

We would like to see transparency around the reporting of statistics of animals used in research and teaching in QLD, including breakdowns of observational only studies and the fate of animals at the end of their use. There is currently a lack of transparency in the reported numbers coming from QLD.

Overseas developments regarding the rehoming of animals in medical research;

The rehoming of animals from medical research. It is taking place all over the world right now. The release of animals is already mandatory in India and parts of the USA including Minnesota, California, Connecticut, Delaware, Illinois, Maryland, Nevada, New York, Rhode Island, Washington, and Oregon.

Releases are also taking place with the help of reputable rescue groups in the below countries where it is not mandatory, but better supported by the industry and governments. Rescue organisations listed below beside each country;

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| India: facebook.com/FreaglesOfIndia | USA: kindnessranch.org |
| Netherlands: shhh.nl | USA: befreeglefoundation.org |
| Hungary: beagle-fajtamentes.hu | USA: bfp.org |
| South Korea: beaglerescuenetwork.org | NZ: shorturl.at/jlszV |
| UK: runfreealliance.com | |

Recommendations: Australia ranks fourth in the world when it comes to the number of animals used for medical research. We are falling behind in the area of rehoming. While BFA are successful in our endeavors, our biggest hurdle is in the negotiation stages. It can take years to convince a facility to work with us. Meanwhile the animals they house are aging, becoming more withdrawn and even dying. Release MUST be made mandatory.

Animal Ethics Committees;

Currently there are AECs spread around QLD who are not conducive to the utmost care and understanding of the animals and their welfare. There are members sitting on AECs who have an outdated philosophy and lack current training and understanding on animal welfare practices, philosophies and practicality in animal behaviour.

Recommendations: We ask that the QLD government apply a term of no more than 3 years for members to sit on AEC.

In summary;

We would like to see several improvements made for the welfare of animals used in research and teaching within QLD, including up-skilling for facility staff, enhanced enrichment programs for facility animals, staff to animal ratio regulations implemented, greater transparency around the reporting of animal use statistics and a maximum term of no more than 3 years for members to sit on an Animal Ethics committee. We believe that these improvements will aid in the enhancement of the lives of facility animals, both within the facility and externally in their new homes.

The Australian Code of Practice for the Care and Use of Animals for Scientific Purposes 2013 states at point 1.1 ***Respect for animals must underpin all decisions and actions involving the care and use of animals for scientific purposes.*** We ask that the Minister keep this in mind when amending this bill

BFA is was founded out of Australia's longest running breed specific rescue group. We have set up the first sanctuary of its kind in the country and we have spent years securing the successful release of facility animals around Australia, we are set up to facilitate small or large releases, from one facility or from many at once. We have an incredible network of vets, nurses, trainer/behaviourists, other rescue groups, trained foster careers and adoptive homes all waiting for that perfect family member to join them. We thank you for this opportunity and we would love to meet with you to discuss in more depth these points and more. We would be interested in helping to advise, build and implement new systems and/or codes of practice within the industry.

Yours sincerely,



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President - Beagle Freedom Australia

[Redacted contact information]