

Review of the Animal Welfare Standards and Guidelines Development Process

*Department of
Agriculture, Fisheries
and Forestry*

July 2013

Executive summary

PwC was commissioned by the Australian Government Department of Agriculture, Fisheries and Forestry to review the current process for the development of Animal Welfare Standards and Guidelines. This review was conducted during the period from April to June 2013, and involved direct consultation with stakeholders across agricultural industries, government and animal welfare organisations.¹

Our overall finding is that the Animal Welfare Standards and Guidelines development process is not an entirely 'broken' process that needs to be replaced or remodelled. Rather, we conclude that the current process can be retained with some modifications and refinements, primarily focusing on greater clarity around roles and responsibilities, stronger conflict resolution processes and improvements to the use of Regulation Impact Statement processes within Standards development.

This review report provides a description of the key strengths and weaknesses of the current process, and identifies key areas for improvement to the process. It also provides proposed structure and roles, and a summary of key changes proposed.

Strengths of the current Animal Welfare Standards and Guidelines development process

In consultations for this review, we tested with stakeholders what they considered to be key strengths of the process, as well as their views on the effectiveness of stakeholder engagement processes. The following five elements are considered to be the key strengths of the process:

1. *Inclusiveness of the process* – the process is seen as a strongly inclusive process, allowing involvement by a broad set of stakeholders
2. *Effectiveness of the consultative mechanisms for stakeholders* – the process includes appropriate mechanisms and timeframes for consultation with stakeholders
3. *The role of AHA (or an equivalent body) as project manager of the process separate from government* – independent project management of the process is seen as a key strength
4. *The national approach to Standards development* – stakeholders are strongly supportive of the Standards being developed through a national process, which would support consistent Standards across all States and Territories
5. *The inclusion of science in Standards development* – overall, the inclusion of science is seen as a strength, though there is still room for improvement.

Each of these areas is discussed in more detail in Chapter 1 of this report.

¹ Details of the review Terms of Reference and methodology are provided in Appendix B of this report.

Weaknesses of the current Animal Welfare Standards and Guidelines development process

Consultations also tested with stakeholders their views on key weakness of the current process. The following four elements are considered to be the most significant weaknesses of the current process.

1. *Efficiency and time management* – the inclusiveness of the process, while a strength, also leads to the greatest weakness of the process, which is the time taken to develop the Standards (though some stakeholders note that given the difficulty of task, it is reasonable to assume that it will take a long period to develop Standards).
2. *Conflict resolution* – the nature of the issues being discussed, and the inclusiveness of the process has led to conflicts between participants, which have not been well managed within the process.
3. *Barriers to implementation by the states and territories* – there is a concern amongst stakeholders that the Standards may not be implemented in a timely manner by State and Territory governments, in part due to the Standards not being ‘regulation ready’.
4. *Lack of clarity around objectives* – there is a lack of agreement on the overarching objective of the Standards, which is driving conflict within the process. Further, the process lacks full consideration of broader community views and expectation on animal welfare, which need to be balanced with industry and animal welfare organisations views (which do not fully represent community views).

Areas for improvement

We have identified five key areas where the current process can be improved, and 20 recommendations supporting this analysis (provided in full in Chapter 3 of this report).

1. Objective of the Animal Welfare Standards and Guidelines

The Business Plan for the development of Australian Standards and Guidelines for Welfare of Livestock states the objective of the Standards and Guidelines:

... the national livestock welfare standards, with complementary guidelines, provide welfare outcomes that meet community and international expectations and reflect Australia’s position as a leader in modern, sustainable and scientifically-based welfare practice.²

This objective includes a requirement for the Standards and Guidelines to meet community expectations. There is, however, currently a relatively low understanding, or agreement, on what these expectations are. This is a gap in the current analysis and development of the Standards, which has contributed greatly to the problems of conflicts within the process. Without a strong statement of objective, each party involved in the process has their own benchmark of what the Standards should be seeking to achieve – a common complaint from Animal Welfare organisations is that the Standards are not sufficiently ambitious and do not ‘raise the bar’. Conversely, industry supports the establishment of processes

² Australian Animal Welfare Strategy 2009, *Development of Australian Standards and Guidelines for the Welfare of Livestock*. Business Plan. Available at: <http://www.animalwelfarestandards.net.au/files/2011/01/Animal-Welfare-Standards-and-Guidelines-Development-Business-Plan.pdf>

which reflect practicalities of agricultural business. This fundamental difference of opinion of the objective of the Standards drives much of the conflict within the process. What is needed is greater articulation and consideration of the broader community expectations in this area, which are likely to be something of a balance between these two polarised view points.

The identified gap in understanding of community expectations should be addressed through focused social science research. This is a complex research area, and should be conducted by suitably qualified, independent researchers. In particular, the methods for testing community perceptions, views and values need to be sufficiently robust to avoid bias in responses (which can occur where questions are not appropriately phased or ordered). We would recommend that this research support decision making in this field, not that government only be guided by community views. Outcomes from this research should be balanced with industry input and scientific knowledge on animal welfare matters.

Recommendations:

1. Improve understanding of community expectations around animal welfare through research or surveys
2. AWC have a stronger role in representing broader community views within the Standards and Guidelines development process
3. Future Standards development refer to evidence of broader community expectations, to balance other views (within the RIS process)

2. Structure of the Animal Welfare Standards and Guidelines

In consultations for this review stakeholders expressed differing views on the structure of the Standards and Guidelines. Positive views on the current structure focus on the added flexibility that is provided by having the Guidelines within the same document as the Standards (and being developed through the same process). Conversely, criticism of the current structure focuses on the confusion in interpretation of the role of Guidelines, and the extent to which they are enforceable

There is clearly support for the development of Guidelines within the current process. Some stakeholders suggested there is merit to transition the Guidelines out of the Standards document itself to avoid the misconception that Guidelines are potential future Standards even though the intent of the different roles of Standards and Guidelines has been previously made clear (including that guidelines cannot be used as a defence under legislation). However, the balance of evidence suggests that in this case it is practical to keep the Guidelines and Standards together. In some cases the Guidelines help to interpret the Standards and they also provide guidance where there is not enough scientific evidence for a Standard. There was also strong support for maintaining close links in both processes and continuing to make clear the different intent of both Guidelines and Standards. The development process should continue to ensure industry is closely engaged and has greater responsibility to communicate the Guidelines as statements of good practice (reflecting the benefits to industry of being seen to manage its practices against animal welfare objectives).

A further issue to consider in relation to the structure of the Standards and Guidelines is the extent to which they are 'regulation ready'. The view of stakeholders consulted for this review is that the way the Standards are drafted makes it difficult to convert them to regulation. The language within the Standards is not always sufficiently precise for regulations, and therefore requires substantial redrafting in some instances. Separating out the Standards document from the

Guidelines will provide greater clarity for governments in this regard (as noted in Recommendation 4). There are further considerations on the degree of 'regulation readiness' in the following sections on process and roles (see Recommendation 10 which addresses the issue around the drafting of Standards).

Recommendations:

4. Retain Guidelines and Standards within the development framework and continue to publish them as a single document.
5. Industry take a higher level of responsibility for promoting the Guidelines as representative of good industry practice. Government should continue to lead development of the Guidelines with close industry engagement, to ensure that they are consistent with Standards.

3. Process structure and roles within the Standards and Guidelines

The current process, a summary of which is provided in Appendix A of this report, provides for close stakeholder involvement in the processes Standards and Guidelines development (a characteristic which is considered to be a strength of the process). The process is managed by AHA, which provides secretariat support for a large Reference Group and a smaller Writing Group (which has the task of developing the Standards and Guidelines for review by the Reference Group).

While the process, in principle, includes the appropriate elements for effective development of Standards and Guidelines, there is a need for greater clarity, and demarcation of the role of each party within the process. This would address identified problems around the roles of the Reference Group and Writing Group, and the role of AHA as project manager rather than a mediator of conflict.

The following six Recommendations have been developed. In relation to Recommendation 9, the purpose of this recommendation is not necessarily to limit the scope of input to the Standards drafting, but rather to have clear boundaries between the Reference Group and the Writing Group which should avoid the 'circulation' of issues that currently occurs between these two groups.

Recommendations:

6. Clearly articulate roles within the process, identifying the following roles:
 - a) Project management and facilitation
 - b) Standards development and drafting
 - c) Representative advice and comment
 - d) Decision making
7. The current Reference Group should be confirmed as a body for representative advice and comment, not decision making
8. The Reference Group size should be limited by reducing the scope for multiple representations at meetings.
9. Standards development and drafting should be conducted by an individual or small group with expertise in Standards development. They would seek input on technical matters as needed, and would be supported by the project manager. This function should not be tasked to a representative group.

10. Increased support for legal drafting within the Writing Group, which may be from an external provider or through the States and Territories, to improve the drafting of the Standards to be 'regulation ready'.
11. Regulation Impact Statements should be used earlier in the Standards development process as a means of seeking input from a broad range of stakeholders.

4. Conflict resolution

As discussed in Chapter 2 of this report, conflict between participants of the Standards and Guidelines development process has been a major impediment to progressing and getting Standards agreed. Stakeholders observed that AHA, with best intentions, has sought to mediate between participants in the process, in an effort to keep the process on track. There is a strong view that it is not the role of AHA, as project managers, to also step in and resolve conflict.

Recommendations 12 to 14 provide our recommendations on how the current process could be improved to better manage conflicts, and to reduce the impact that conflict has on the effectiveness and efficiency of the process. It is important to note that there are potentially significant benefits from improving facilitation and the earlier and increased application of the RIS process. However, many disputes related to animal welfare standards stem from diverse values and philosophies that are deeply held with consensus unlikely to be reached in some cases and/or there is insufficient scientific evidence to achieve a clear resolution. In these cases, Government should have the role of resolving any dispute and/or making a final decision.

Recommendations:

12. Meetings should be facilitated by independent individuals with specific facilitation skills, rather than technical expertise.
13. The RIS process should be used more clearly as a mechanism to consider a range of options and reflect on the evidence basis for particular arguments.
14. The process should include referral of disputes that have stalled the development process to the AWC in the first instance. The AWC could choose to elevate the resolution of a dispute to PISC and SCOPI.

5. Evidence-based decision making

Standards need to reflect best available evidence, based on both scientific and economic research. In consultations, stakeholders were generally supportive of the use of scientific research within the Standards and Guidelines development process, though not all agreed that there is sufficient scientific research being conducted to support the decisions that need to be made in the Standards development process. In relation to relevant economic analysis, there are significant gaps in knowledge around current practices, and costs of alternatives, which would support the impact analysis within the RIS analysis. Without an understanding of the nature and extent of application of current practices it is difficult for government to understand the extent of the 'problem' that the Standards are seeking to address (a key element of the RIS process).

Recommendations:

15. Small research tasks should be conducted to support the RIS process and ensure decisions are evidence based.
16. Emphasis should be on engagement of research for Standards development, independent of other interested parties.
17. Future RIS development should be properly resourced to develop estimates around current practice and the extent of the 'problem'. Without this the economic analysis is weakened.

Learning from other models

We considered a range of other models, both from overseas and within policy areas in Australia, with a view to identifying particular solutions to the identified weaknesses of the process under review.

We found that improved application of the RIS process (which is already partially incorporated within the Standards development process) would address many of the identified problems.

Recommendations:

18. There should be earlier engagement with stakeholders during the Consultation RIS stage
19. There should be stronger emphasis on using the RIS process to analyse areas of conflict through scientific and/or economic research
20. Governments should ensure that the RIS includes objective methods for measuring community views and expectations

Summary of proposals for change

Figures 1 and 2 below provide a summary of the proposed revisions to the current process, as well as the proposed changes to the roles within the process.

Figure 1: Summary of proposed revisions to Animal Welfare Standards and Guidelines development process

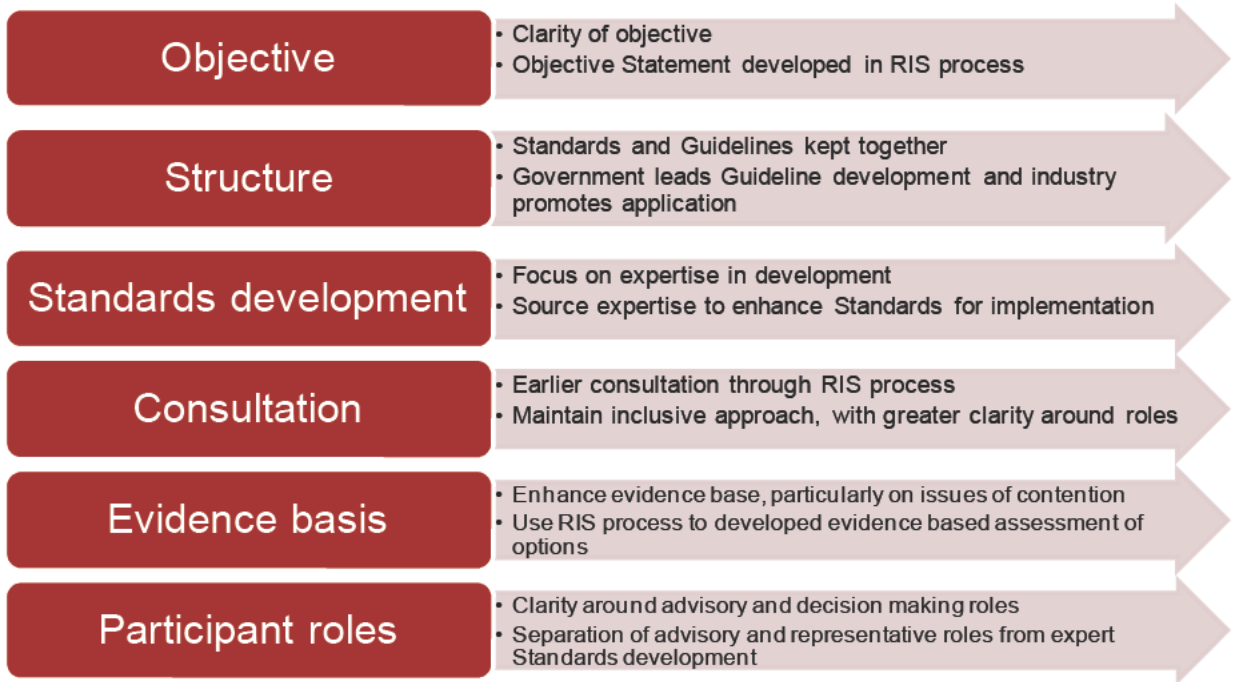
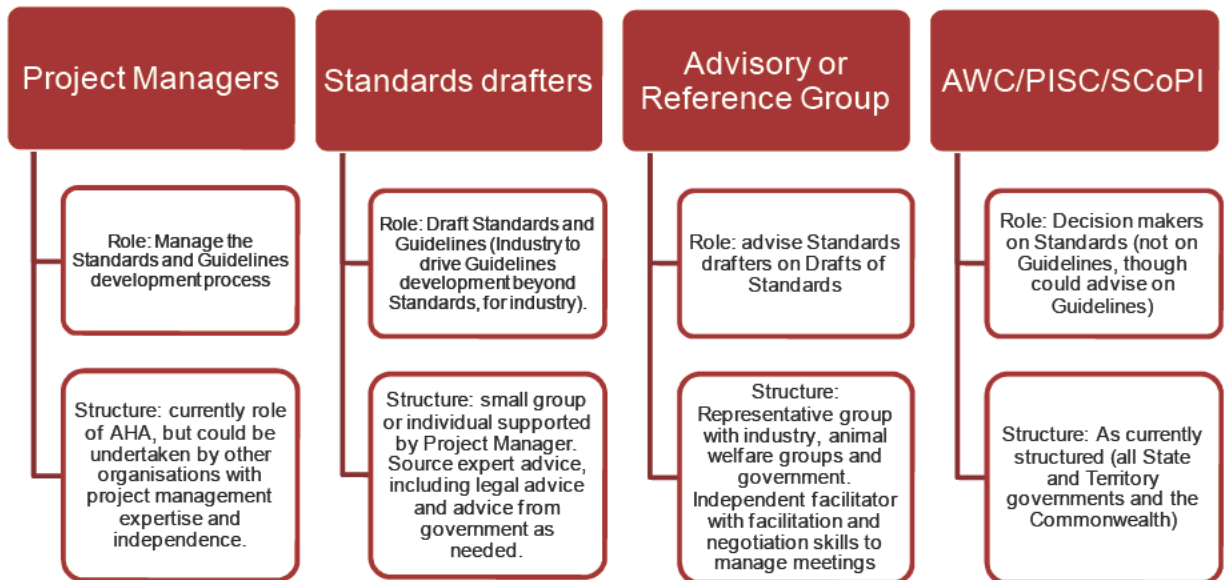


Figure 2: Proposed roles and structure



Contents

Executive summary	i
1 Strengths of the current process	1
2 Weaknesses of the current process	4
3 Areas for improvement in the current process	7
4 Summary of proposed changes	17
Appendix A Summary of the current process for development of Animal Welfare Standards and Guidelines	19
Appendix B Review scope and methodology	22

1 Strengths of the current process

In consultations for this review, we tested with stakeholders what they considered to be the key strengths of the process, as well as their views on the effectiveness of stakeholder engagement processes. What emerged from interviews and survey responses was a number of consistent views across the stakeholder group on the process's key strengths:

- Inclusiveness of the process
- Effectiveness of the consultative mechanisms for stakeholders
- The role of AHA (or an equivalent body) as project manager of the process separate from government
- The national approach to Standards development
- The inclusion of science in Standards development

Each of these identified strengths are discussed in the following sections.

1.1 Inclusiveness

The majority of stakeholders consulted for this review stated that the process is inclusive and takes in the views of a broad range of participants. Stakeholders value the 'bringing together of industry, governments and community groups' to discuss the setting of Standards and Guidelines. In consultations, it was often emphasised that all three stakeholder groups (industry, animal welfare groups and government) had a very valuable role to play in the process. The degree of inclusiveness of the process was the most commonly identified strength of the process mentioned by stakeholders to this review.

The reported value of an inclusive process is that it facilitates the development of Standards and Guidelines that:

- are clear and applicable for farmers and industry members that will work according to regulation; and
- have community support, and the buy in from animal welfare groups.

In consultations, government representatives mentioned the importance of the involvement of industry and community groups, while the response from industry stakeholders was more mixed. Some, but not all, industry stakeholders recognised that animal welfare groups needed to be 'around the table' in order to ensure community buy in, in the long run. Others were less keen, noting that it is industry that will be tasked with implementing the Standards.

While inclusiveness is clearly an area of strength, some stakeholders did note that the process does not always reach beyond Peak industry bodies (for instance, to State and Territory-based industry groups). While it is recognised that this is the role of the peak bodies, this was not always being done effectively. Suggestions for improving this element focused on earlier public consultations on the Standards, to balance out the involvement of those on the Reference Group and those not on the

Survey response on strengths of the process:
"The support of industry through participation in the writing group and membership of the Standards Reference Group. After all, it is industry that will be subject to the regulations and needs to fully support the process".

Reference Group. Overall, the principles of inclusiveness embodied within the process are highly valued, and considered to be a better approach than government imposing Standards without buy in by industry.

1.2 Consultative processes

Many stakeholders reported the consultative nature of the process as one of its key strengths. Industry representatives, in particular, found the timeframes given to review documents, seek feedback from their members and to undertake research, sufficient. Some suggested that shorter periods between reference group meetings and shorter public consultation times could speed up the process in total, which they would see as beneficial.

Survey response on strengths of the process
“Structured, consultative process with scientific input.”

Most stakeholders interviewed believe their inputs were valued. Some industry representatives mentioned that even if the end result did not entirely reflect what they had proposed, they felt their views were taken into account throughout the process.

One stakeholder suggested that the consultative nature of the process leads to ‘ownership’ of the standards by all parties involved. Another participant found the consultative nature of the process key to ‘finding common ground’, whereas previously codes of practice were developed in isolation.

A number of stakeholders also highlighted the importance of the public consultation phase, which is seen to be essential for ensuring that the Australian public have been consulted and consequently support the outcomes.

1.3 Role of Animal Health Australia as a project manager independent of government

Survey response on strengths of the process
“Very competent management of process by AHA, with independent chair of writing groups and standards reference groups.”

There is a strong view from stakeholders across industry, government and community groups suggesting it was important for an independent body, such as Animal Health Australia (AHA), to lead the process, rather than government taking a lead role. Further, the overall impression from stakeholders is that AHA has done a reasonable job, in the very challenging role of managing the development of Standards to date.

While this role is considered to be a strength of the process, there is some concern from animal welfare groups, and some government representatives, that AHA, as an organisation is more closely aligned with industry positions, and therefore may not be sufficiently independent in the process. Conversely, industry strongly supports AHA in the project management role, because it believes that it has a stronger understanding of the sector than government (which they see as essential for the project manager role). These potential issues of bias may be driven, in part, by the attempts of AHA to act as a mediator in particular situations where there has been conflict between parties in the process. These issues are addressed in Chapter 3 of this report.

1.4 National approach to Standards development and implementation

Development of nationally consistent standards, as opposed to codes of practice that vary across jurisdictions, was mentioned as one of the key strengths by stakeholders across industry, government and animal welfare groups.

Consistency is particularly important for industry stakeholders operating across different states and territories, as variation between states impacts on business

practices of farmers and other industry participants who operate in more than one jurisdiction.

Some industry representatives mentioned that national standards will provide industries a clear indication of what they have to comply with, which is vital for market access and consumer confidence.

1.5 Science based approach to Standards development

Many stakeholders considered it a strength that the Standards and Guidelines development process takes into account science based literature.

Most stakeholders across government and industry stated that scientific literature available was reviewed and used as a baseline for the standards; however participants also agreed that there were large gaps in the scientific literature on the topic of animal welfare. Resources need to be invested in further research and development in many areas of animal welfare.

However, responses differed greatly on whether the appropriate science was used in the development of standards and guidelines. Animal welfare groups especially considered there to be a greater need for research and the inclusion of science based standards.

2 Weaknesses of the current process

Throughout the consultations we tested with stakeholders what they considered to be the key weaknesses of the process, as well as their views on the effectiveness of stakeholder engagement processes. A number of consistent views emerged from interviews and survey responses across the stakeholder group on the process's key weaknesses:

- Efficiency and time management
- Conflict resolution
- Barriers to implementation by the states and territories
- Lack of clarity around objectives

Each of these identified weaknesses is discussed in the following sections.

2.1 Efficiency and time management

Most people interviewed suggested that the outcomes of the process were crucial to their organisation, and thus they saw it as necessary to invest sufficient time and resources. However, nearly all stakeholders and survey respondents found that the process is time consuming and slow in achieving outcomes.

Almost all stakeholders mentioned that this process was among the most time consuming of comparable processes they had been involved in to date.

Stakeholders across all groups – industry, government and animal welfare - pointed out the frequent revisiting of items as a major contributor to this issue.

One of the causes of this was seen to be high staff turnover, both of government representatives and industry representatives. Not having the same people at meetings meant previous discussions and rationales for decisions often had to be summarised and repeated at later meetings. Some participants noted that the long periods of time between meetings exacerbate this problem because of staff turnover within the representative agencies.

Industry participants, in particular, suggested there was often more than sufficient time between meetings to communicate developments to their members and seek feedback from the members. Conversely, animal welfare groups did not believe there was enough time given ahead of meetings to review the documents, research existing literature and science and prepare appropriately for Reference Group meetings.

Some stakeholders mentioned that not having the decision makers at the table during the meetings was another contributor to having to revisit items. Representatives from government and industry do not have the authority to make decisions, thus have to refer back to their organisations or board to confirm their view on an issue.

Another contributing factor to the process being drawn out was topics being discussed both in the Reference Group and the Writing Group. Some industry stakeholders highlighted a lack of understanding of elements of the process, such

Survey response on weaknesses of the process *“This process seems to have been underway since before 2006 and in 2013 there still isn't a National Policy (standards/guidelines) on Animal Welfare.”*

as the definition of the role of each group. One industry stakeholder mentioned, that the roles were explained in detail during the first ever Reference Group meeting, and it was assumed that participants were aware of the roles thereafter.

Duplication was especially an issue for stakeholders involved in the land transport standards development. Some stakeholders mentioned that while they appreciated the inclusiveness of the process, the large number of participants involved added complexity, and slowed down the process considerably.

2.2 Conflict resolution

Conflict between parties occurs regularly during the process. While the large number and variety of participants ensures the process is inclusive, it also leads to groups, who have very different views and motivations, having to discuss and define animal welfare Standards and Guidelines that everyone can agree with.

Our discussions with stakeholders in interviews, and the online survey responses highlight the range of strongly held, but often opposing views on certain aspects of animal welfare. While this is to be expected, the process does not currently have any specific mechanisms to manage conflicts between parties, in particular when conflict escalates to the point where the process cannot proceed (such as when parties refuse to attend meetings).

Across stakeholders there were also inconsistent views on who should resolve conflicts between stakeholders. There was some agreement among stakeholders, that ultimately conflict resolution was not the role of AHA, but should be dealt with 'higher up'.

Another matter that many stakeholders disagree on is how the Reference Group and Writing Group Chair should and does manage conflicts. Responses from stakeholders were often centred on the personality, or the perceived views of the Chair, rather than the role of the chair *per se*. Animal welfare groups openly state that it is their belief the Chair is biased towards industry.

Survey response on weaknesses of the process *"Difficulty resolving conflicts between parties, in particular when parties walk away from the process."*

Another issue raised was, that often -but not exclusively- conflict arose where there was a lack of science based literature to support claims. Some stakeholders suggested that more resources need to be invested in animal welfare related research and development, in order to develop appropriate standards and guidelines. Most stakeholders stated that there was a need for more research, and some pointed out that where there has been engagement with scientific organisations such as the CSIRO, this has worked well. Some industry representatives mentioned the contribution of 'independent experts' was valuable.

Where there was inconclusive scientific literature, some stakeholders suggested that there may be the need for an independent research advisory panel to resolve conflict to determine which scientific literature is most applicable. While this was identified by several stakeholders from government, industry and animal welfare groups, none were sure who this independent body should be. Timelines, or how this would add an extra layer of process, were not discussed.

Overall, the majority of stakeholders were satisfied with the way AHA manages the process, however, some stakeholders mentioned that AHA is taking on too much of the responsibility, and other bodies, such as the AWC, that are not as directly involved, should be called in to resolve conflicts, where appropriate.

2.3 Barriers to implementation by the States and Territories

Having nationally consistent standards was deemed to be important by the majority of stakeholders involved in the review process. However, most

stakeholders consulted were not confident that the states and territories could implement the standards consistently.

The importance of nationally consistent standards was particularly highlighted by industry stakeholders in particular, who are strong supporters of nationally consistent Standards. They noted that having significantly different standards across jurisdictions meant that businesses have to refer to multiple pieces of regulation to ensure they are complying with legal requirements. Some noted that having a national Standard could change the way people operate on the ground, whether they are in Victoria or NSW, which defeats the purpose of having national standards. One stakeholder suggested there is need for legal support on the Writing Group, in order to achieve 'regulation ready' standards.

Representatives of the state governments outlined that standards should be more 'regulation ready' and easier to implement, which will reduce state government resources needed and will reduce the need for redrafting by states. (This may lead to improvements in implementation).

Some government stakeholders pointed out that resources will vary. For example DPI Victoria has its own inspectors, while NSW and WA rely on the RSPCA to report animal welfare issues.

2.4 Lack of clarity around objectives

Many stakeholders mentioned that having both standards and guidelines is an asset to the process. However, it was also raised that there was a lack of clarity around the objectives of the Standards. When asked about the definition of Standards, stakeholders gave different answers, ranging from 'the lowest common denominator' to 'industry best practice'. Some participants suggested during the interview process, that it was not clear to them, how exactly Standards and Guidelines are defined.

Industry stakeholders especially expressed differing opinions on the role of guidelines. Some saw guidelines as the 'how to' guide to implement the standards. Others saw standards as the lowest common denominator for animal welfare, and the guidelines as something that goes above and beyond.

One industry representative, on the other hand, suggested that the Standards set levels of practice which are too high, and now exceed the expectations of the Australian community. Several stakeholders expressed that there is a lack of understanding of what community expectations actually are, in relation to animal welfare practices.

Some stakeholders suggested that guidelines should not be part of this process, as they will not be regulated. For example, they should be developed by industry, or Standards Australia. Other stakeholders liked the fact that they had the opportunity to 'park' particular issues as part of the guidelines, where parties agreed that the issue was important but could not agree on enough detail to turn them into standards.

Animal welfare groups and some government stakeholders thought that the standards do not go far enough, and that they are merely enforcing what is already happening in industry, rather than stretching industry to deliver best practice standards.

Overall, the underlying issue is that much of the debate around standards centres on moral, ethical and values-based issues.

Survey response on weaknesses of the process "Weak justification for conducting the process in the first place (What's broken?)"

3 Areas for improvement in the current process

Drawing on the identified key strengths and weaknesses of the current process, we have developed a set of five themes for areas where there is potential for improvement. These improvements have the potential to raise the current level of effectiveness and efficiency of the standards and guidelines development process. These themes are:

1. Objective of the Animal Welfare Standards and Guidelines
2. Structure of the Animal Welfare Standards and Guidelines
3. Process structure and roles within the Standards and Guidelines development process
4. Conflict resolution
5. Evidence base for decision making

This chapter provides an analysis of each of these themes, including key findings from our consultations and research, and recommendations for consideration by the AWC.

3.1 Objective of the Animal Welfare Standards and Guidelines

The Business Plan for the development of Australian Standards and Guidelines for Welfare of Livestock states the objective of the Standards and Guidelines:

... the national livestock welfare standards, with complementary guidelines, provide welfare outcomes that meet community and international expectations and reflect Australia's position as a leader in modern, sustainable and scientifically-based welfare practice.³

This objective includes a requirement for the Standards and Guidelines to meet community expectations. There is currently relatively low understanding, or agreement, on what these expectations are. This is a gap in the current analysis and development of the Standards. The Guidelines for Regulation Impact analysis require that the potential impact on the community of a particular problem are identified, as well as the impact of any options for change – while the current participants in the process have their own views on what the community expectations are, there are two key weaknesses in the current approach:

*Key Finding 1:
The current process becomes stalled where there are competing views on the objectives that the Standards should be meeting*

³ Australian Animal Welfare Strategy 2009, *Development of Australian Standards and Guidelines for the Welfare of Livestock*. Business Plan. Available at: <http://www.animalwelfarestandards.net.au/files/2011/01/Animal-Welfare-Standards-and-Guidelines-Development-Business-Plan.pdf>

- There is little independent evidence providing clarity around community expectations – often both industry and animal welfare groups will state that they understand community’s views, but each have their own interpretation
- There is no direct representation of a broader community or society view within the process – this ideally is the role of government as ultimate arbiter and decision maker. At the moment, the perception is government is not providing this input into the process.

These factors have contributed greatly to the problems of conflicts within the process. Without a strong statement of objective, each party involved in the process applies their own benchmark of what the Standards should be seeking to achieve. A common complaint from Animal Welfare organisations is that the Standards are not sufficiently ambitious and do not ‘raise the bar’. Conversely, industry supports the establishment of processes which reflect practicalities of agricultural business. This fundamental difference of opinion of the objective of the Standards drives much of the conflict within the process. What is needed is greater articulation and consideration of the broader community expectations in this area, which are likely to be something of a balance between these two polarised view points.

The identified gap in understanding of community expectations should be addressed through focused social science research. This is a complex research area, and should be conducted by suitably qualified, independent researchers. In particular, the methods for testing community perceptions, views and values need to be sufficiently robust to avoid bias in responses (which can occur where questions are not appropriately phased or ordered). We would recommend that this research support decision making in this field, not that government only be guided by community views. Outcomes from this research should be balanced with industry input and scientific knowledge on animal welfare matters.

Recommendations:

1. Improve understanding of community expectations around animal welfare through research or surveys
2. AWC have a stronger role in representing broader community views within the Standards and Guidelines development process
3. Future Standards development refer to evidence of broader community expectations, to balance other views (within the RIS process)

3.2 Structure of the Animal Welfare Standards and Guidelines

The Animal Welfare Standards and Guidelines, both those finalised and in development, are structured to include both Standards and Guidelines, each of which has a specific purpose:

- *Standards* are the requirements which would be established in legislation as legally enforceable practices. They are drafted as ‘must’ statements. Standards are intended to establish the minimum set of requirements for the treatment of animals, and should be focused on those areas where there is the greatest need for government intervention.
- *Guidelines*, in this framework, are a set of practices which establish a level of protection of animal welfare which is agreed good industry practice.

*Key Finding 2:
There is a lack of
understanding of the purpose
of Guidelines as currently
drafted*

Within the framework, guidelines set a higher level of protection than Standards. Non-compliance with Guidelines will not in itself constitute an offence under law.

In consultations for this review there were differing views expressed on the structure of the Standards and Guidelines. Positive views on the current structure focus on the added flexibility that is provided by having the Guidelines within the same document as the Standards (and being developed through the same process). Issues can be included within the Guidelines, where there may not be agreement for their inclusion as a Standard. Further, the inclusion of Guidelines allows for a higher level of industry practice to be articulated as a goal for industry.

Conversely, criticism of the current structure focuses on the confusion in interpretation of the role of Guidelines, and the extent to which they are enforceable (with some industry representatives concerned that the Guidelines reflect potential *future* Standards). Further, the inclusion of Standards and Guidelines within the same document adds a level of complexity for State and Territory governments when they go through the process of translating the Standards into regulations.

There is clearly support for the development of Guidelines within the current process. Some stakeholders suggested there is merit to transition the Guidelines out of the Standards document itself to avoid the misconception that Guidelines are potential future Standards even though the intent of the different roles of Standards and Guidelines has been previously made clear (including that guidelines cannot be used as a defence under legislation). However, the balance of evidence suggests that in this case it is practical to keep the Guidelines and Standards together. In some cases the Guidelines help to interpret the Standards and they also provide guidance where there is not enough scientific evidence for a Standard. There was also strong support for maintaining close links in both processes and continuing to make clear the different intent of both Guidelines and Standards. The development process should continue to ensure industry is closely engaged and has greater responsibility to communicate the Guidelines as statements of good practice (reflecting the benefits to industry of being seen to manage its practices against animal welfare objectives).

A further issue to consider in relation to the structure of the Standards and Guidelines is the extent to which they are 'regulation ready'. As discussed in Chapter 2, there is considerable concern amongst stakeholders about the capacity of State and Territory governments to be able to implement the Standards (as regulations) within reasonable timeframes. This issue places uncertainty around the timeframes for when industry will be required to meet the Standards. A key factor influencing the implementation of Standards by governments is the structure and content of the Standards themselves, and the extent to which they are 'regulation ready' – which relates to how readily they can be developed into regulations (the extent of additional drafting and restructuring that may be required by governments to implement the Standards as regulations).

*Key Finding 3:
The Standards and Guidelines
are not 'regulation ready' for
implementation by States and
Territories*

The view of stakeholders consulted for this review is that the way the Standards are drafted makes it difficult to convert them to regulations. The language within the Standards is not always sufficiently precise for regulations, and therefore requires substantial redrafting in some instances. Differences across jurisdictions mean that the effort required by each jurisdiction to convert the Standards into regulation varies considerably (for instance, depending on how each jurisdiction has structured their legislation and regulations, the changes may require just a referral to the Standards, or it may require a fully drafted new piece of regulation). Therefore, improvements to the Standards themselves would address a proportion of the problem of implementation, and would help to improve implementation timeframes.

There are further considerations on the degree of ‘regulation readiness’ in the following sections on process and roles (see Recommendation 10 which addresses the issue around the drafting of Standards).

Recommendations:

4. Retain Guidelines and Standards within the development framework and continue to publish them as a single document.
5. Industry take a higher level of responsibility for promoting the Guidelines as representative of good industry practice. Government should continue to lead development of the Guidelines with close industry engagement, to ensure that they are consistent with Standards.

3.3 Process structure and roles within the Standards and Guidelines development process

*Key Finding 4:
There is a lack of clarity of roles of each of the parties within the process*

The current process, a summary of which is provided in Appendix A of this report, provides for close stakeholder involvement in the Standards and Guidelines development (a characteristic which is considered to be a strength of the process). The process is managed by AHA, which provides secretariat support for a large Reference Group and a smaller Writing Group (which has the task of developing the Standards and Guidelines for review by the Reference Group).

While the process, in principle, includes the appropriate elements for effective development of Standards and Guidelines, there is a need for greater clarity, and demarcation of the role of each party within the process. Key problems identified include:

*Key Finding 5:
The role of the Reference Group is not clear, with some expectation that the group has advisory and decision making functions within the process*

- The perceived role of the authority of the Reference Groups to make decisions, as opposed to providing comment and advice on the Standards and Guidelines (with the preference being for this group to be clearly an advisory group)
- The role of the Writing Groups, which should be focused on the development of the Standards documents themselves, rather than providing a representative view (that is, offering a view as a representative of a particular organisation). Writing Group membership should be based on expertise and knowledge in Standards development and/or areas of science related to animal welfare. Potentially for future Standards, this role may be undertaken by a skilled individual or two people, rather than a group *per se*.
- The role of the chair of the Reference Group, which should be an individual with experience in group facilitation, rather than someone with particular technical expertise. Ideally, the Chair should be someone who has no direct involvement or previous history in the field, but is a skilled facilitator and negotiator.
- It should be clear to all parties that the ultimate decision maker for the Standards is the SCoPI. While it is valuable to have industry ‘buy in’ to the Standards (which will avoid future compliance costs and legal issues), governments are the ultimate decision makers (and therefore must take

*Key Finding 6:
The role of the Writing Group is currently on clearly defined as being an expert group, rather than a representative group*

responsibility for making decisions on contentious issues where the process may be stalled).

Given these identified issues, the following six Recommendations have been developed. In relation to Recommendation 9, the purpose of this recommendation is not necessarily to limit the scope of input to the Standards drafting, but rather to have clear boundaries between the Reference Group and the Writing Group which should avoid the ‘circulation’ of issues that currently occurs between these two groups.

Recommendations:

6. Clearly articulate roles within the process, identifying the following roles:
 - a) Project management and facilitation
 - b) Standards development and drafting
 - c) Representative advice and comment
 - d) Decision making
7. The current Reference Group should be confirmed as a body for representative advice and comment, not decision making
8. The Reference Group size should be limited by reducing the scope for multiple representation at meetings.
9. Standards development and drafting should be conducted by an individual or small group with expertise in Standards development. They would seek input on technical matters as needed, and would be supported by the project manager. This function should not be tasked to a representative group.
10. Increased support for legal drafting within the Writing Group, which may be from an external provider or through the States and Territories, to improve the drafting of the Standards to be ‘regulation ready’.
11. Regulation Impact Statements should be used earlier in the Standards development process as a means of seeking input from a broad range of stakeholders.

Key Finding 7:

There is currently no mechanism within the process to resolve conflicts which threaten the progress of Standards development

3.4 Conflict resolution

As discussed in Chapter 2 of this report, conflict between participants of the Standards and Guidelines development process has been a major impediment to progress in getting Standards agreed. Stakeholders observed that AHA, with best intentions, has sought to mediate between participants in the process, in an effort to keep the process on track. There is a strong view that it is not the role of AHA, as project manager, to also step in and resolve conflict.

There are a number of factors which have lead to conflict within the process to date:

1. The nature of the issues being considered, and parties participating in the process. In many ways the strength of the process in being inclusive, also drives a weakness – inclusiveness leads to a range of view points being represented ‘around the table’. Further, the nature of the arguments on animal welfare issues are typically moral and values-based, and highly emotive. In such circumstances, conflict is difficult to avoid.

2. The lack of an agreed objective for the Standards at the start of the process, as discussed under section 3.1, leads to differing objectives being debated within the Standards development process. The level of ambition of the Standards – which is essentially what the Standards should be seeking to achieve, is a key area of conflict.
3. The lack of a ‘circuit breaker’ or other process which can address conflicts as they arise. Some stakeholders noted that the recent changes to the AWC have improved the effectiveness of AWC to make decisions on issues of contention. There is no other independent means of considering issues which are stalling the process.
4. The facilitation of the Reference Groups and Writing Groups could benefit from having a Chairperson with specific skills in facilitation and negotiation, rather than technical skills (which can be provided by members of the Reference Group themselves).
5. The current process delays broader public consultation until very late in the Standards development and RIS development stage. The RIS process, if used appropriately, can be a mechanism to seek broader comment on options under consideration. Further, the evidence requirements of the RIS mean that particular areas of contention can be thoroughly considered on the basis of available evidence (including both scientific and economic research).

Recommendations 12 to 14 provide our recommendations on how the current process could be improved to better manage conflicts, and to reduce the impact that conflict has on the effectiveness and efficiency of the process. It is important to note that there are potentially significant benefits from improving facilitation and the earlier and increased application of the RIS process. However, many disputes related to animal welfare standards stem from diverse values and philosophies that are deeply held with consensus unlikely to be reached in some cases. Further, limitations of available science can constrain negotiating an agreed position. In these cases, Government should have the role of resolving any dispute and/or making a final decision.

The process could work by AHA referring an issue to the AWC when it judges the process is stalled. The AWC could then resolve the issue itself or choose to elevate it to the Primary Industries Standing Committee or ultimately to the Standing Council on Primary Industries. Where the issue stems from a moral or philosophical difference, it is appropriate that Government, representing the community should make a final decision.

Having this process would relieve the AHA of the potentially difficult task of mediating within the process they also project manage.

Recommendations:

12. Meetings should be facilitated by independent individuals with specific facilitation skills, rather than technical expertise.
13. The RIS process should be used more clearly as a mechanism to consider a range of options and reflect on the evidence basis for particular arguments.
14. The process should include referral of disputes that have stalled the development process to the AWC in the first instance. The AWC could choose to elevate the resolution of a dispute to PISC and SCOPI.

Key Finding 8:

There are opportunities to use independent scientific and economic research to address particular issues of conflict

3.5 Evidence-based decision making

Animal welfare issues are strongly emotive, with arguments often based on an individual's values, ethics and moral beliefs. As noted above, the nature of these issues drives conflict in Standards development, where participants often have fundamental differences in their view points.

The Standards being developed are tools for government to ensure that animal welfare principles are being met to a level which, as the Standards objective statement notes: 'meet community and international expectations and reflect Australia's position as a leader in modern, sustainable and scientifically-based welfare practice'⁴. In meeting this objective, the Standards need to reflect best available evidence, based on both scientific and economic research. In consultations, stakeholder were generally supportive of the use of scientific research within the Standards and Guidelines development process, though not all agreed that there is sufficient scientific research being conducted to support the decisions that need to be made in the Standards development process.

Research does not necessarily need to be government funded but it is important that it is considered impartial.

Key Finding 9:

Poor level of understanding of current practice makes it difficult for RIS analysis to identify the extent of the 'problem'

In relation to relevant economic analysis, there are significant gaps in knowledge around current practices, and costs of alternatives, which would support the impact analysis within the RIS analysis. Without an understanding of what current practices are occurring, it is difficult for government to understand the extent of the 'problem' that the Standards are seeking to address (a key element of the RIS process).

Recommendations:

15. Small research tasks should be conducted to support the RIS process and ensure decisions are evidence based.
16. Emphasis should be on engagement of research for Standards development, independent of other interested parties.
17. Future RIS development should be properly resourced to develop estimates around current practice and the extent of the 'problem'. Without this the economic analysis is weakened.

3.6 Learning from other models

Alongside reviewing the strengths and weaknesses of the current Animal Welfare Standards and Guidelines development process, we also considered other models for Standards development, with a view to identifying any elements which may be applied to the process under review.

For this task, we sought examples or suggestions from stakeholders in our interviews and online survey. The response from stakeholders was very limited, with many commenting that:

⁴ Australian Animal Welfare Strategy 2009, *Development of Australian Standards and Guidelines for the Welfare of Livestock*. Business Plan. Available at: <http://www.animalwelfarestandards.net.au/files/2011/01/Animal-Welfare-Standards-and-Guidelines-Development-Business-Plan.pdf>

- They had limited experience across different policy areas, so were not in a position to provide a commentary on their appropriateness or effectiveness.
- They believe that international examples would provide limited learnings, given that:
 - Australia is considered to be performing well in this area against international standards
 - Many other countries have similarly complex processes to ours, and are perhaps less stringent in relation to enforcement (such as agreements under the EU)
 - Standards in Australia should be developed within the specific context of Australian industry.

*Key Finding 10:
International examples do
not present any significant
improvement over our
current process*

Stakeholders did suggest a further review of Standards development in New Zealand, which is provided in the Box below. This description provides useful context around the process adopted in New Zealand, which is focused on setting minimum standards in codes of welfare. As the description suggests, the mechanisms for developing Standards have two streams, which allow for an organisation to invest in Standards development, or for development to be conducted by a group similar to the Writing Groups within the Australian process. Overall, while an interesting comparison, the New Zealand example does not provide any significant elements which would directly address the areas of weakness within the Australian process.

Mangement of animal welfare in New Zealand

Animal welfare is regulated in New Zealand under the Animal Welfare Act 1999 (the Act). The Act is based on a duty of care philosophy and the definitions of the physical, health and behavioural needs in the Act are based on the Five Freedoms promulgated by the UK Farm Animal Welfare Council.

The Act does not expand on these obligations, for example, it does not detail what constitutes an appropriate amount of food or water for a particular species. The detailed minimum standards are given in the codes of welfare.

These codes are detailed and aim to promote best practice and inform and identify future directions through research and development. Each topic in a code usually covers minimum standards.

The Act provides for the development of codes of animal welfare and gives legal force to the minimum standards that they contain.⁵ The Act provides for codes of animal welfare to be reviewed at least every 10 years.

There are two ways in which the process of writing a welfare code can be initiated:

1. An organisation (or person) may draft a code of welfare and submit it to the NAWAC for consideration. The organisation will bear the costs for development of the draft code.
2. The National Animal Welfare Committee (NAWAC) may appoint a writer or a writing group to prepare a draft code.

⁵ O'Hara P.J. and O'Connor, C.E. 2007. Challenge of developing regulations for production animals that produce the welfare outcomes we want. *Journal of Veterinary Behavior* 2: 205–212.

In line with NZ Animal Welfare Strategy, published in 2012, NZ is aiming to make changes to the Animal Welfare Act 1999.

After extensive public consultation, and receiving over 2000 submissions, the Animal Welfare Amendment Act Bill was introduced by the Minister for Agriculture on 8 May 2013.⁶

The Bill changes the Act to make it more enforceable, clear and transparent and allows for the creation of enforceable regulations that will complement the minimum standards contained within New Zealand's 16 codes of welfare. The regulations will also establish clear rules for live animal exports.

Some stakeholders in interviews did suggest that the process for developing Standards under the Food Standards Code is a good example of a process which is effective and well managed. They indicate the key strengths of this process are:

- The role of FSANZ as independent authority which is sufficiently resourced to manage the process and conduct research (or commission research) on matters relevant to standards development
- Clearly communicated consultative processes, the stages for which are well articulated and understood by stakeholders. There was a strong sense of clarity of process in comments.

These positive elements of the FSANZ process which were highlighted by stakeholders are consistent with those areas identified in our analysis (in particular, clarity around roles and process).

The final process that we considered closely is the Regulation Impact Statement process. While the current process does include RIS development within its process, there are a number of aspects of the process which are not being fully taken advantage of. The RIS process includes a number of key elements which the Standards development process could adopt, which would address many of the current weaknesses. For instance:

- The Consultation phase of a RIS could be used earlier in the Standards development process, to allow for involvement by those groups or individuals not directly involved in the development process. This can be consultation on options for Standards (though some stakeholders cautioned going out with early draft of the Standards which may be interpreted by some in industry as being final Standards).
- The RIS process can be used to clearly state the objective of the Standards and agree to this objective, and the role of government, prior to commencing the process of developing Standards.
- The RIS process is an excellent means through which to assess options against available evidence of costs and benefits. It should be supported by research, in particular economic research around current practice and the extent of the 'problem' as noted in Recommendation 17.

⁶ Ministry for Primary Industries. 2013, *Animal Welfare Amendment Act Bill introduced*. Available at: <http://www.biosecurity.govt.nz/biosec/consult/proposals-for-aw-strategy-and-aw-act>

An enhanced use of the RIS process principles in Standards development would address many of the weaknesses identified in our analysis

Recommendations:

18. There should be earlier engagement with stakeholders during the Consultation RIS stage
19. There should be stronger emphasis on using the RIS process to analyse areas of conflict through scientific and/or economic research
20. Governments should ensure that the RIS includes objective methods for measuring community views and expectations

4 Summary of proposed changes

The discussion in Chapter 3 highlights five areas for improvements to the process, as well as learning from other models. It provides 20 recommendations for government to consider in making refinements to the current process. By way of summarising these proposed changes, we have developed the two figures below, the first which summarise the key areas for change, the second which articulates the proposed changes to roles and structure within the process.

Figure 3: Changes in approach to Standards development – key areas



Figure 4: Proposed roles within the revised process



Appendices

Appendix A Summary of the current process for development of Animal Welfare Standards and Guidelines	19
Appendix B Review scope and methodology	22

Appendix A

Summary of the current process for development of Animal Welfare Standards and Guidelines

Animal Health Australia (AHA) was commissioned under the Australian Animal Welfare Strategy, to facilitate the development of nationally consistent standards and guidelines for livestock. The welfare standards and guidelines aim to streamline animal welfare legislation in Australia, ensuring that it results in improved welfare outcomes and is practical for industry.

The process includes rewriting the current Model Codes of Practice (MCOP) to incorporate both the national welfare standards and industry guidelines for each species or enterprise.

The main outcome will be a standards and guidelines document for each of the key sectors which will comprise of two main parts:

- Standards – the acceptable animal welfare requirements designated in the document. The requirements that must be met under the law for livestock welfare purposes
- Guidelines – The recommended practices to achieve desirable animal welfare outcomes. The guidelines complement the standards. Non-compliance with one or more guidelines will not in itself constitute an offence under law.

The development process for the standards and guidelines aims to be transparent and inclusive. Relevant scientific literature, current practice and community expectations are taken into account to support an evidence based approach.

The process follows a business plan⁷ for the standards and guidelines, which outlines the following phases:

- Development
- Public consultation
- Revision
- Publication

⁷ Australian Animal Welfare Strategy 2009, *Development of Australian Standards and Guidelines for the Welfare of Livestock*. Business Plan. Available at: <http://www.animalwelfarestandards.net.au/files/2011/01/Animal-Welfare-Standards-and-Guidelines-Development-Business-Plan.pdf>

Development

The development phase is the most time and resource intensive phase as it includes the initial stage of scoping and developing the project plan, writing two drafts of the standards and guidelines documents, and getting feedback from Reference Groups (RGs) and the Office of Best Practice Regulation (OBPR).

Initially, during the development stage AHA works in consultation with stakeholders to develop a **project plan**. AHA also convenes a Writing Group and prepares for the Standards Reference Group Meeting 1 (SRG1) including the development of an issues paper and first draft.

Invitations are issued for the SRG with appropriate representation from key stakeholders, including all members of the AWC, RSPCA Australia, Animals Australia and other relevant organisations

The SRG1 endorses WG and SRG membership. It also endorses the project plan and communications strategy. It considers the issues paper and further develops draft standards.

During this phase any issues in the project plan and communications strategy are managed by the AHA. Appropriate consultants are appointed to run the public consultation process, manage the Regulation Impact Statement (RIS) and consult with the Office of Best Practice Review (OBPR) about the project as early as possible and seek guidance on the approach for the RIS.

The necessity for a scientific literature review is considered by the Writing Group. If considered necessary, AHA and relevant R&D agencies will undertake a literature review. It is intended for any such investigations not to slow the standards development process.

Under guidance of the Writing Group, an **initial draft** standards and guidelines document is written, incorporating guidance from SRG1.

Then the writing group will use flexible, small group processes to seek solutions to issues by collaboration and consensus as far as possible. With consideration given to reference group comments, the Writing Group and AHA prepare a **second draft** of the standards document for consideration by the SRG.

The meeting will also consider and endorse the public consultation strategy and materials. Documents provided to the SRG are to be provided at least four weeks prior to meetings, in order to give all stakeholders enough time to identify and address any issues.

Public Consultation

AHA and the Writing Group arrange for the preparation of a '**consultation RIS**', based on the second draft developed at SRG2. AHA will seek formal approval of the consultation draft RIS by the OBPR. This RIS together with the draft standards, will then be made available for **90 days** on a public website, for consultation and comment.

Revision

A detailed summary of submissions is prepared by the consultant for the public consultation process. AHA will lead small working groups to coordinate a detailed response (**Public Consultation Response Action Plan**). A draft report will then be provided to the SRG that will incorporate the proposed final draft, and recommendations as to how unresolved issues will be progressed by SRG4.

If SRG5 is not able to reach consensus, the issue will be referred to AWC/PISC/SCoPI for resolution and decision. (It may not be necessary to have a fifth meeting.)

The final draft standards and RIS will be recommended by the SRG to government. The proposed standards and RIS will be submitted through AWC/PISC to SCOPI

for endorsement. Any issues that may arise at this stage will be addressed by the Reference Group.

Publication

After government endorsements the standards and guidelines and approval of the RIS, the standards and guidelines will be published and promoted online. The Australian Welfare Standards will be enforced by the states and territories. They will also be communicated to national industry bodies for incorporation into industry quality assurance, as appropriate.

Implementation and harmonisation is the responsibility of the jurisdictions with overall coordination by DAFF.

Appendix B

Review scope and methodology

1 Review Terms of Reference

The Consultant is to conduct a review of the Animal Welfare Standards and Guidelines development process. The review will investigate, report and make recommendations on:

- the strengths and weaknesses of the existing animal welfare standards and guidelines development process;
- alternative models for developing animal welfare standards and guidelines including the advantages and disadvantages and relative costs of each model;
- the effectiveness of stakeholder consultation in the development of standards and guidelines under the current model and alternative stakeholder engagement options; and
- the design of animal welfare standards to ensure the language is regulation-ready and that there is consistency across all animal welfare standards.

The Consultant is to provide a weekly written report on progress to the Department Contact Officer through email and/or hard copy correspondence.

The Consultant is to attend weekly meetings with the Department Contact Officer to discuss project activity.

The Consultant is to deliver a final written report including recommendations to the Department Contact Officer before the end of the contract period.

2 Review methodology

Stakeholder interviews

The following stakeholders were consulted in person or via teleconference during the review process.

Organisation	Representatives
Government	
NSW Department of Primary Industries	<ul style="list-style-type: none"> Amanda Paul, Veterinary Officer, Animal Welfare Branch
Victorian Department of Primary Industries	<ul style="list-style-type: none"> s. 47F(1) David Champness, Principal Veterinary Officer – Livestock Management Standards Stephen Tate, Director Bureau of Animal Welfare
NT Department of Primary Industry and Fisheries	<ul style="list-style-type: none"> Malcolm Anderson, Chief Veterinary Officer
SA Department of Primary Industries and Regions	<ul style="list-style-type: none"> s. 47F(1)
QLD Department of Agriculture, Fisheries and Forestry	<ul style="list-style-type: none"> Rick Symons
Department of Primary Industries, Parks, Water and the Environment Tasmania	<ul style="list-style-type: none"> Rod Andrewartha, Chief Veterinary Officer
WA Department of Agriculture and Food	<ul style="list-style-type: none"> Bruce Mullan and Richard Norris
ACT Government	<ul style="list-style-type: none"> Fleur Flannery, Director of City Services

Industry	
Meat and Livestock Australia	<ul style="list-style-type: none"> • Jim Rothwell, Program Manager Sustainability R&D
AgForce Queensland	<ul style="list-style-type: none"> • Anna Campbell, Senior Livestock Policy Advisor • Peter Hall, cattle farmer and member of Agforce,
Sheepmeat Council of Australia, and Wool Producers Australia	<ul style="list-style-type: none"> • Ron Cullen, CEO Sheepmeat Council of Australia • Kathleen Ferme, Senior Policy Officer (Animal Health and Welfare), Sheepmeat Council of Australia • s. 47F(1)
National Farmers Federation Cattle Council of Australia	<ul style="list-style-type: none"> • s. 47F(1) • s. 47F(1) • Jedd Matz, CEO of CCA
Australian Meat Industry Council	<ul style="list-style-type: none"> • s. 47F(1)
Australian Livestock Markets Association	<ul style="list-style-type: none"> • s. 47F(1)
Australian Chicken Meat Federation Australian Poultry Industry Association Australian Egg Corporation	<ul style="list-style-type: none"> • Andreas Dubs, Executive Director, ACMF • Vivien Kite, Assistant Executive Director, APIA • James Kellaway, Managing Director, AEC
Tasmanian Farmers and Graziers Association	<ul style="list-style-type: none"> • Jan Davis, CEO • Kim Haywood, Commodities Policy Advisor
Western Australian Farmers Federation	<ul style="list-style-type: none"> • Lucy Radzikowska, Wool Executive Officer • Genevieve Morrow, Meat Executive Officer • s. 47F(1)
NSW Farmers Association	<ul style="list-style-type: none"> • s. 47F(1) • s. 47F(1) • s. 47F(1)
Australian Pork	<ul style="list-style-type: none"> • Kathleen Plowman, General Manager
Dairy Australia Australian Dairy Farmers Limited	<ul style="list-style-type: none"> • Robin Condron, Manager Animal Health and Welfare, DA • Helen Dornom, Manager Sustainability, DA • Kevin Shiell, Consultant to ADF • Terry Toohey, Chair of ADF's Animal Health and Welfare Policy Advisory Group • David Losberg, ADF Policy Manager

Review scope and methodology

Industry	
Livestock Contractors Association	• Sue Jacka, Contractor
Northern Territory Cattlemen's Association	• Luke Bowen, Executive Director
Australian Lot Feeders Association	• Geoff Conford

Animal Welfare	
RSPCA	<ul style="list-style-type: none"> • s. 47F(1) • s. 47F(1)
Animals Australia	<ul style="list-style-type: none"> • Glenys Oogjes, Executive Director • s. 47F(1)
Other	
Animal Health Australia	<ul style="list-style-type: none"> • Kevin de Witte, Executive Manager (Market Access Support) • Michael Bond, CEO
Harding and Associates	<ul style="list-style-type: none"> • Tim Harding, Principal
Australian Veterinary Association	<ul style="list-style-type: none"> • Kevin Doyle, National Veterinary Director

Online survey

An online survey, covering a mixture of open and closed questions was completed by 23 respondents from various industry groups. The questions were consistent with those used in the interview.

The purpose of conducting a survey as well as stakeholder interviews was to gauge the views of other interested groups who may not have been available for interview, or could not be interviewed within the timeframes of the review.

