

# Review of the *Animal Welfare Act 2002*



Copyright © Western Australia Agriculture Authority 2020.

## Summary Report on the Public Consultation

June 2020

## CONTENTS

<b>Executive Summary</b> .....	<b>2</b>
Box 1: Themes Raised by Multiple Respondents.....	3
<b>Introduction</b> .....	<b>4</b>
<b>Background and Methods</b> .....	<b>4</b>
Background to the Public Consultation .....	4
Method of Review of Submissions .....	5
<b>Results of the Consultation</b> .....	<b>5</b>
Number of submissions received .....	5
How the submissions were made .....	6
The people and organisations that made submissions.....	7
General Comments on the operational effectiveness of the Act.....	8
Comments Related to the Review Process and Overall Legislative Framework.....	8
Key Themes Raised in Submissions.....	8
<b>Conclusion</b> .....	<b>12</b>
<b>Appendix 1 – Web form</b> .....	<b>13</b>
<b>Appendix 2 – Terms of Reference of the Review</b> .....	<b>14</b>
<b>Appendix 3 – Pro-Forma Letters</b> .....	<b>15</b>
<b>Appendix 4 – List of Respondents</b> .....	<b>22</b>

## EXECUTIVE SUMMARY

In the period 14 October to 16 December 2019, the independent Panel (Panel) responsible for the Review of the *Animal Welfare Act 2002* (WA) (Act) invited submissions from stakeholders on matters of importance to the operation and effectiveness of the Act.

The Panel greatly appreciated stakeholders' submissions, all of which will be considered in the Review.

This report provides an overview of comments submitted to the Panel. The Panel received 342 written submissions, from a wide variety of stakeholders, including members of the public; parliamentarians; animal welfare advocates, operators of animal shelters; livestock producers and associations; universities, and the veterinary sector. Submissions were provided by e-mail and web-based form, and varied greatly in their format, length and detail. Many stakeholders used one of four 'pro-forma' letters. Themes raised by multiple respondents ('common themes') are listed in [Box 1](#).

Given the fact that the consultation process was not designed for quantitative or statistical analysis, no attempt was made to assign significance to topics based on the number of respondents that mentioned an issue, or the use / non-use of a pro-forma letter. The fact that a respondent raised a theme is simply recorded; no attempt is made to classify a given theme as more, or less, significant.

This report provides some context in relation to the common themes. However, to keep the report to a readable length, extensive and detailed text was reduced to summary points. Every effort was made to respect the intent of the respondents but some inaccuracies may have resulted from the process of summarising major submissions.

The submissions reflect a broad range of opinions from diverse stakeholders. Animal welfare raises complex questions of public policy. There are challenges with considering impacts on animals, economic and practical realities, scientific findings, ethical aspects and public concern about the treatment of animals.

Livestock industry stakeholders, while acknowledging the need for animal welfare regulation, are more supportive of the status quo and are concerned about proposals to introduce a stricter regulatory framework without good cause.

The submissions show that Western Australians are generally interested in animal welfare. There is evidence of concern about the treatment of animals and recognition of the need to strengthen the protection of animals under the Act.

## Box 1: Themes Raised by Multiple Respondents



The current animal welfare regulatory framework does not meet stakeholders' expectations of animal welfare regulation in one or more respects.

Concerns were expressed about the review process, e.g. the Terms of Reference (TOR) are too broad, the review is premature, a more coordinated, whole of government review of the complete regulatory framework is needed

The definition of 'animal' under the Act should be reviewed, e.g. fish and some invertebrates should be included in the definition.

The Act should be modified from the current model based on the prohibition of cruelty to one that promotes good animal welfare and positive life experiences for animals.

Consistent with the previous point, the definition of 'harm' should be revised.

The Act should recognise that animals are sentient and/or should reference the principles in the 'Five Domains' model.

There is a need to resolve inconsistencies in requirements for the use of animals in science: as these currently apply to university researchers and non-university researchers in WA, and researchers working at universities in other jurisdictions.

The definition of 'use for scientific purposes' should be clarified, and efforts made to harmonise requirements with those in legislation of other jurisdictions and clarification of the application of relevant codes of practice.

Submissions that addressed 'defences' under the Act varied:

- Defences for normal husbandry procedures and codes of practice should be retained.
- Current defences result in inadequate protection for pest animals and greyhounds.
- Defences should be reviewed to reduce ambiguity and ensure that all animals in all industries and sectors are afforded appropriate protection.

Requirements for killing animals humanely should be more clearly stated.

The Act should prohibit the killing of an animal maliciously or without apparent purpose, regardless of the method used to kill it.

Submissions that addressed the powers of animal welfare inspectors varied:

- Inspectors should have the power to address urgent animal welfare issues and monitor compliance with court orders/direction notices.
- Inspectors should have the power to enter commercial premises to carry out unannounced inspections, and to issue infringements.
- Inspectors should not have increased powers of entry due to a lack of evidence that inspectors' powers are inadequate and concerns about biosecurity and occupational health and safety issues.



The Royal Society for the Prevention of Cruelty to Animals (RSPCA) should not have the power to enforce the Act in a particular sector, due to concern that the RSPCA has an inherent conflict of interest and that RSPCA inspectors lack knowledge about livestock management practices.

The Act should put the onus on owners to reclaim an animal that has been abandoned and seized by the RSPCA.

There was support for the establishment of an independent office for animal welfare.

Adequate resourcing and training of animal welfare inspectors were recognised as key to achieving acceptable animal welfare outcomes.

## INTRODUCTION

This report summarises the written submissions provided by stakeholders to the Panel during public consultation on the review of the *Animal Welfare Act 2002* (WA) (Act).

The first section outlines the consultation process; provides summary information about those who made submissions; and summarises the key themes, concerns, and suggested amendments to the Act presented in the submissions.

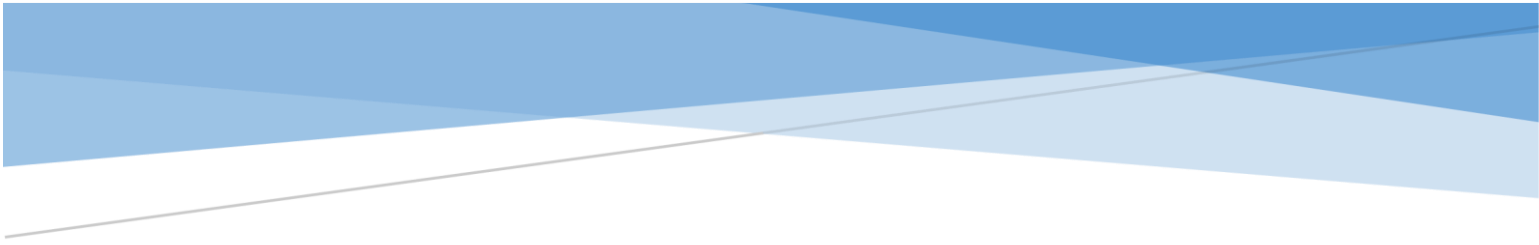
The written submissions received by the Panel presented a diverse range of viewpoints and stakeholders. It is beyond the scope of this report to discuss all issues contained in the written submissions. Rather, the report highlights themes that were raised in several submissions or by several stakeholder groups. Some of these themes are directly relevant to the Act, while others address topics that are more relevant to the subsidiary legislation (i.e. regulations), policies or standards.

## BACKGROUND AND METHODS

### Background to the Public Consultation

In May 2019, the Hon Alannah MacTiernan MLC, Minister for Regional Development, Agriculture and Food, appointed an independent Animal Welfare Review Panel (Panel) to review the Act. The Panel was asked to consider the operation and effectiveness of the Act, including whether it promotes contemporary best practice and is 'fit for purpose' to effectively safeguard the welfare of animals in Western Australia (WA). The Panel will report to Government by August 2020 on its findings, including any recommendations for legislative amendments to the Act. Reflecting the need to incorporate a variety of views, the Panel made arrangements for broad public consultation, including a call for written submissions and public forums in regional and metropolitan locations. The forums are the subject of a separate report.

In the period 14 October to 16 December 2019, the public was invited to complete a written submission on the key issues affecting animal welfare in WA. The consultation period was extended in response to stakeholders' requests and some key stakeholders were asked to provide their submissions by 24 January 2020. Submissions received after this date were read by the Panel but are not covered in this report.



The public consultation was published via a media release<sup>1</sup>, the DPIRD webpage<sup>2</sup>, several social media posts and an e-mail to the list of stakeholders registered for interest in the review. Submissions were accepted through an online feedback form (see [Appendix 1](#)) available on the DPIRD webpage or by e-mail to a designated inbox<sup>3</sup>. Whether by e-mail or using the web-based form, the public was asked to provide comment on or highlight any issues considered relevant to the Panel's TOR (see [Appendix 2](#)). The submission process allowed for free-text commentary in any format and respondents were asked to provide submissions of no more than 5 pages or 2500 words. Four 'pro-forma' letters were used by many respondents ([Appendix 3](#)). Substantive submissions will be posted on the DPIRD website, except when the person or organisation making the submission has requested confidentiality.

## Method of Review of Submissions

All written submissions were read in their entirety. Some submissions included attachments, such as copies of letters, submissions to other relevant consultations, newspaper articles or copies of legislation. All this information was considered. Where an individual stated that the submission represented a group or organisation, that group or organisation was taken to be the submitter. Otherwise, the submission was attributed to the person who sent the submission to the Panel.

This report is based on an analysis of keywords representing themes. The number of submissions containing each keyword was counted to identify 'common themes'. It was not intended (nor necessary) to make a quantitative analysis of the feedback provided by respondents. In common with some other consultative processes conducted by governments, a number of factors confound a statistically based analysis. These include: the broad terms of reference of the review; the large number of pro-forma responses; the allowance of 'free-text' comments, and the presence of common and overlapping themes in submissions. The feedback provided by an organisation (such as an industry body or professional association) represents the views of an unknown number of people. For all these reasons, it is difficult to assign relative importance to submissions.

Quotes from some submissions are included to illustrate common themes.

## RESULTS OF THE CONSULTATION

### Number of submissions received

In total, 351 submissions were received. Some stakeholders made more than one submission, including duplicated submissions; submissions that are distinct but contain similar sentiments; and submissions that provide supplementary information to a previous submission. Excluding multiple submissions, a total of 342 submissions were received.

---

<sup>1</sup> <https://www.mediastatements.wa.gov.au/Pages/McGowan/2019/10/Public-submissions-open-as-part-of-animal-welfare-review.aspx>.

<sup>2</sup> <https://www.agric.wa.gov.au/animalwelfare/review-animal-welfare-act-2002>

<sup>3</sup> [AWA.reviewpanel@dpiird.wa.gov.au](mailto:AWA.reviewpanel@dpiird.wa.gov.au)

## How the submissions were made

Responses were submitted using the web-based form and via e-mail.

Two hundred and twenty-eight submissions used a pro-forma response. This included submissions that copied a pro-forma word-for-word, or submissions that did not differ significantly from the pro-forma. The proportion of submissions by type are illustrated in Figure 1.

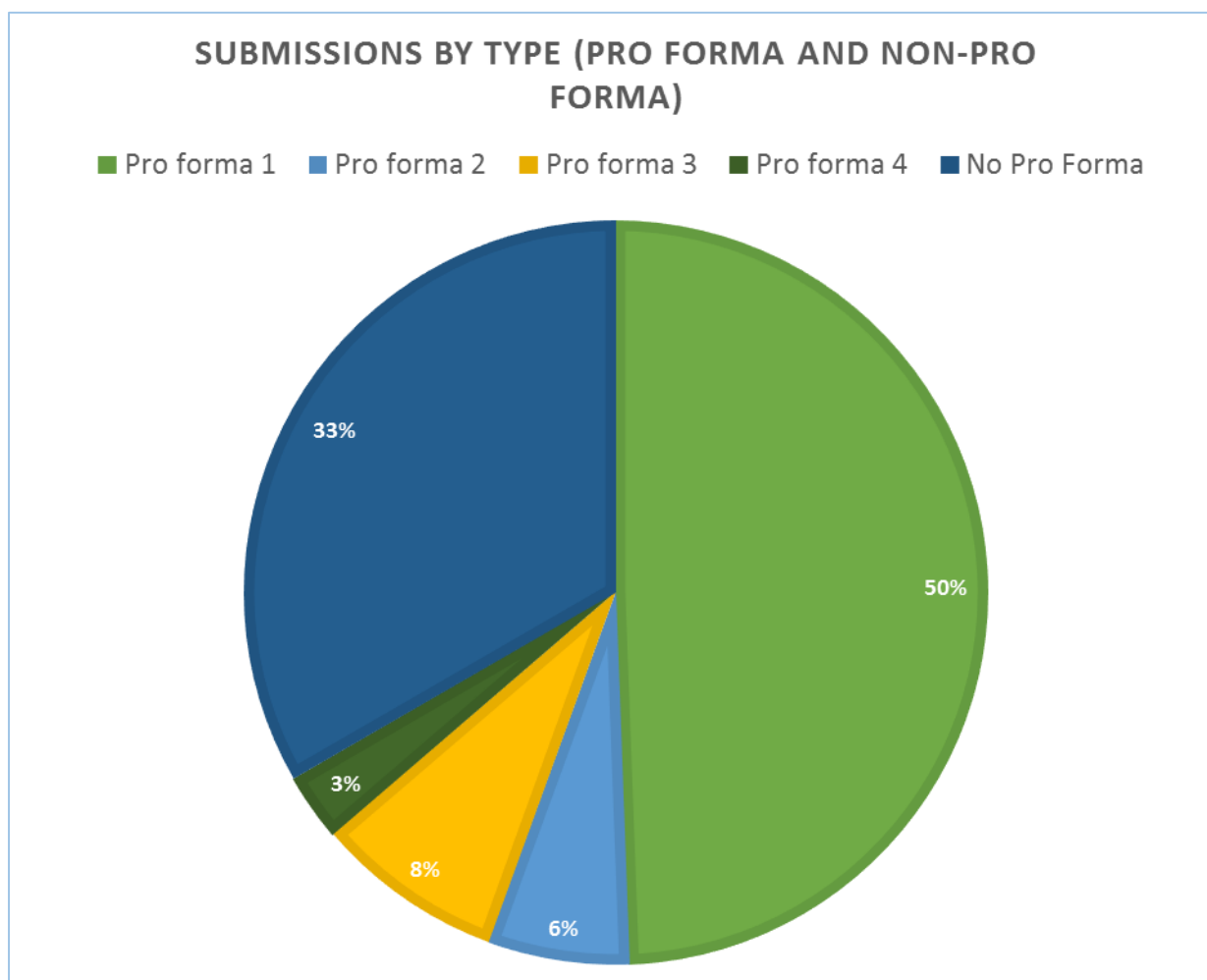


Figure 1: Pie chart showing the proportion of submissions by type of submission

## The people and organisations that made submissions

The submissions represented a diverse range of viewpoints and styles.

Most responses did not give the submitter's location. From information provided, it appears that submissions were received from the Perth metropolitan area; Peel; Kimberley; Wheatbelt; South West; Great Southern; and Goldfields-Esperance and interstate.

Respondents were not asked to provide details as to the 'type' of stakeholder, but this was inferred from the submission, where possible, and assigned to the category that appeared to be most relevant.

A list of respondents is provided in [Appendix 4](#).

The breakdown of submissions by stakeholder type is as follows:

Stakeholder Type	Number of submissions	%
Member of the public/non-identified <sup>1</sup>	290	85%
Not-for-profit organisation <sup>2</sup>	15	4%
Livestock industry association	10	3%
Livestock industry – individual <sup>3</sup>	5	1%
Veterinary sector <sup>4</sup>	4	1%
Parliamentarian	4	1%
University	3	1%
State government department	2	1%
Other	9	3%
<b>TOTAL</b>	<b>342</b>	<b>100%</b>

*Table 1: Submissions by stakeholder type*

<sup>1</sup> This category includes members of the public or those participants for which a category was not able to be identified.

<sup>2</sup> This category includes animal shelters, rescue and rehoming organisations, animal advocacy groups.

<sup>3</sup> These represent individual livestock producers, transporters or managers.

<sup>4</sup> This includes veterinarians and veterinary nurses.



## General Comments on the operational effectiveness of the Act

Respondents generally mentioned the importance of animal welfare and approximately 97% of submissions called for specific changes to the Act or subsidiary legislation, or made comments suggesting that the current framework in WA does not achieve a standard of animal welfare that meets the submitter's or the community's expectations.



*Submission #332: "We believe it is clear that the objects of the current Act do not reflect and promote contemporary best practice in animal welfare".*

Less than 10 submissions did not support a change to the Act. These respondents referred to an existing high standard of animal welfare across the livestock industry; a lack of evidence of historic failures in the Act to provide for the welfare of livestock; concerns that increasing regulatory burden is making farming unprofitable; and that the focus of any enhancements in animal welfare in WA be made through the national standards and guidelines process, or through measures other than legislation, for example, education and training.



*Submission #88: "...supports the existing Act as it currently operates...It needs to be recognised that no amount of regulation will stop the ill-informed or deliberate offender. As well as prosecution, failures to comply must be addressed with education and through peer group leadership, which the PGA believes the industry is doing well."*

## Comments Related to the Review Process and Overall Legislative Framework

Five submissions expressed criticism of the review itself. These included comments that the terms of reference were too broad or unclear; the review should not precede the endorsement of the national standards and guidelines for a particular industry; there is a need to develop an overarching animal welfare strategy prior to considering amendments to the Act; and the consultation was inadequate for all stakeholders to be able to provide meaningful and coordinated input. There was also commentary to the effect that the current animal welfare legislative framework is fragmented, and that a more coordinated, whole of government approach should be taken in the review of the Act and related legislation, standards and policies.

## Key Themes Raised in Submissions

### Definition of 'Animal' in the Act

Thirty three submissions called for an extension of the species of animals covered by the Act. Nearly all (32 submissions) of these submissions called for the Act to cover fish, and there was also support for the inclusion of invertebrates (16 submissions), cephalopods (22 submissions), decapods (18 submissions) and crustaceans (7 submissions) in the Act. Several submissions noted that the Act and subsidiary legislation must recognise that these species are sentient and feel pain, and therefore should be rendered insensible before being killed.



*Submission #27: “Not extending the Act to cover fish (fish, molluscs, crustaceans and most other aquatic organisms) as defined by the Fish Resources Management Act 1994 ignores contemporary scientific findings that provide evidence for fish and invertebrates having sentience and being able to feel pain”*

Nine respondents commented that fish should be included in the definition of ‘animal’ under the Act to harmonise with other states’ legislation, and to ensure consistency in the requirements for the use of fish for research and teaching purposes between the Act and other legislation, such as the *Veterinary Surgeons Act 1960* and the *Australian Code for the Care and Use of Animals for Scientific Purposes*.

One submission explicitly requested that fish not be included in the Act, stating that fish could not be compared with livestock species, and the sufficiency of existing codes of conduct for recreational fishing.

#### *Distinct Approaches to Regulating the Welfare of Livestock and Companion Animals*

Five submissions argued for formal separation in the Act of livestock / commercial animals and companion / sporting / recreation animals, with an associated definition of a ‘commercial animal’ and, potentially, designated livestock inspectors. It was proposed that the RSPCA should not enforce the Act in relation to livestock animals, because this is in conflict with the RSPCA’s role as an animal welfare advocate and particularly its opposition to live export. Industry associations called for inspectors enforcing the Act to have adequate knowledge of livestock industries and normal husbandry practices.



*Submission #346: “There is a clear cut case for a separation of the Act itself in relation to livestock production versus companion animals and as a result removing RSPCA WA from having any role in relation to livestock production compliance, inspection and/or prosecution”.*

#### *The Concept of ‘Good Animal Welfare’ and Definitions of ‘Harm’*


There was a clear theme throughout the submissions that animal welfare regulation in WA should be founded not only in the prevention of cruelty but also in the promotion of ‘good animal welfare’ and positive life experiences for animals. One hundred and ninety seven submissions stated that the Act should provide for people in charge of animals to have a duty of care to provide for their basic needs.

Twenty nine submissions considered that the legislation should formally recognise animal sentience.

Thirty one submissions called for the legislation to reflect the principles set out in the ‘Five domains’ model. The definition of ‘harm’ was discussed in 23 submissions, with support for the removal of the word ‘severe’ from the current definition of harm in the Act.



*Submission #338: “Animals are sentient beings that are conscious, feel pain and experience emotions...Humans should strive to provide positive experiences to promote a life worth living for the animals in their care.”*



Some respondents raised concerns about current livestock transport practices (22 submissions), livestock housing (16 submissions), 'puppy farming' (10 submissions) and 'pig-dogging' (hunting pigs with dogs; 16 submissions). While these submissions did not necessarily specify changes to the Act, the concern was that some current practices either should be banned or modified as they cause an unacceptable level of harm. This lends support to the need to review the definition of harm in the Act, and potentially consider a more inclusive definition that promotes animal welfare rather than just focusing on the prevention of cruelty.



*Submission #24: "The Act should include in its definition of harm the causing of mental or emotional anguish to an animal, including fear, anxiety or misery due to the threat/expectation of harm or disregard for the need to express natural behaviours. The Act should also make clear that it is an offence not only to cause harm to an animal through deliberate action or inaction, but also through negligence or reckless disregard for the risk of harmful consequences."*

### Use of Animals for Scientific Purposes

Sixteen submissions called for a ban on the use of animals in scientific experimentation, with some mentioning that the Act should explicitly encourage alternatives to testing on animals. Two submissions from university stakeholders called for clarification of the definition of 'scientific purposes' and questioned whether Part 2 of the Act should apply to formal and informal teaching in places such as farms and veterinary practices, where the animals are not specifically kept for scientific purposes. One university stakeholder pointed out that this lack of clarity has led to inconsistencies, with environmental consultants, local governments and citizen science groups undertaking observational studies of animals without a licence as set out in Part 2 of the Act, while the same study conducted by a university required a licence. University stakeholders recommended reconsideration of the term "veterinary skills" when describing the requirement for people involved in an approved project involving animals (*Animal Welfare (Scientific Purposes) Regulations 2003*, Schedule 1, Form 2). These stakeholders stated that many investigators are not veterinarians, nor does the activity they are conducting necessarily constitute veterinary surgery as defined by the *Veterinary Surgeons Act 1960*.

### Defences against a Charge of Cruelty

Submissions that addressed defences under the Act varied. While some called for the retention of defences for normal husbandry procedures and codes of practice, others were concerned that defences allow for practices or activities that generally do not represent acceptable animal welfare.

Some submissions raised specific concerns about one or more defences, as follows:

- The Codes of Practice do not reflect contemporary best practice for the welfare of animals, or a specific species of animal and are not appropriate (12 submissions).
- The defences relating to Codes of Practice and 'normal animal husbandry' do not adequately protect the welfare of racing greyhounds (34 submissions).

- The defence relating to ‘killing pests’ excludes ‘pest animals’ from the provisions of the Act through the terminology ‘generally accepted as usual and reasonable for killing pests’ (17 submissions), which is unacceptable. All animals should be killed humanely. The use of traps to kill pest animals should be prohibited (10 submissions).

Provisions on electric prodders and painful procedures performed on livestock that are currently acceptable through the regulatory framework should be reviewed, and either banned or include a requirement for pain relief for some/all animal classes (10 submissions).

### Humane killing of animals

Sixteen submissions referred to the recent case of the killing of a kookaburra at a WA tavern. Respondents expressed disbelief that the person could not be prosecuted under the Act based on the argument that harm could not be proven. Although these submissions did not specifically suggest an amendment to the Act, it is evident that members of the community consider that it should be unlawful to maliciously kill an animal, no matter what method is used. This opinion was also reflected in responses using pro-forma 2 (21 submissions): ‘it should be unlawful to kill an animal as an act of violence, retribution, entertainment and/or amusement’. Several submissions alluded to the need for methods of humane killing to be prescribed, or conversely for inappropriate methods to be banned under the Act. The Veterinary Surgeons’ Board of WA recommended that veterinary surgeons be permitted under the Act to euthanase animals without permission from the owner or inspector if required to immediately alleviate suffering.

### Inspectors’ Powers – polarised views

Two hundred and sixty four submissions called for strengthening the powers of inspectors under the Act. Relevant themes included:

- Inspectors should have sufficient powers of entry to ensure people are complying with direction notices and court orders under the Act and to immediately assist distressed animals.
- Inspectors should have the power to enter commercial/business properties unannounced for ‘on the spot’ inspections or audits.
- Inspectors, particularly RSPCA inspectors must be given the power to issue infringement notices for minor offences.

Submissions that opposed increasing inspectors’ powers of entry cited insufficient evidence that the current powers are inadequate to monitor animal welfare, and indicated that current powers are equivalent to powers of other public inspectors. There was also concern that unannounced inspections could present risks to biosecurity and occupational health and safety.

### Penalties

Twenty submissions discussed penalties. There was a diverse range of opinions. Many felt that the penalties should generally be increased, including calls to increase the penalties for offences against police animals, for aggravated offences, repeat offenders and offences committed by corporate entities.



*Submission #261: “In cases of abject (sic) abuse and cruelty, and repeat offenders, harsher penalties need to be applied including more custodial terms. This is in line with expectations of the community.”*

Two submissions explicitly supported maintaining existing penalties.



*Submission #30: “The majority of penalties provide a minimum fine of \$2,000 and maximum of \$50,000 and maximum sentence of 5 years. This seems to reflect community expectation that a penalty should apply for those who inflict cruelty on animals.”*

Lifetime bans on ownership of animals was recommended in seven submissions, as well as the creation of a centralised ‘offenders list’ to support the enforcement of the lifetime ban.

### Dealing with Seized Animals

One hundred and ninety two submissions considered that the onus should be on the owner of an animal to reclaim an animal that has been abandoned by the owner and seized by the RSPCA.

### Independent Office for Animal Welfare

Concerns about regulatory capture were expressed in 64 submissions, including respondents who used pro-forma 3 or 4. These submissions raised concerns about conflict of interest on the part of the RSPCA and/or DPIRD and called for the creation of an independent government body to administer the Act.



*Submission #26: “Science and research evidence both support the requirement for animal welfare law and policy to be administered by a body that is free from vested interests and ‘regulatory capture’ to clear the path for proper enforcement of laws. For example, the creation of an Office of Independent Animal Welfare.”*

### The Provision of Adequate Resources and Training to Enforce the Act

Fourteen submissions noted the importance of resourcing and training inspectors for the Act to be enforced in a sound manner. Submissions noted a need for sufficient inspectors to enforce the Act, and for inspectors to receive adequate training, which could include setting minimum training standards relevant to the sector or industry that they are regulating.

## CONCLUSION

The submissions show that Western Australians are generally interested in animal welfare. There is evidence of concern about the treatment of animals and recognition of the need to strengthen the protection of animals under the Act.



## APPENDIX 1 – WEB FORM

### Animal Welfare Act review - public consultation

The independent Animal Welfare Act Review Panel is interested in hearing from you regarding the operation and effectiveness of the *Animal Welfare Act 2002* (the Act).

The Panel appreciates short and succinct submissions that address issues that are relevant to you. Submissions must be no longer than five pages or 2500 words. The Panel will invite you to provide further information if required.

Please provide any comments that you wish to make to the Panel relating to the Panel's terms of reference.

Please advise if you object to your submission being made public.

The initial closing date for the consultation was 5pm on 25 November 2019. The closing date has now been extended to **5pm on 16 December 2019**.

The Panel's terms of reference are as follows:

1. Determine whether the objects of the Act reflect and promote contemporary best practice in animal welfare such as recognition of the ability of animals to express innate behaviours, and if necessary recommend appropriate legislative amendments.
2. Identify any impediments to the effective enforcement of the Act and any related regulations, with specific attention to the powers of inspectors and the prosecution of offenders.
3. Consider amendments to policies, standards and legislation to achieve contemporary best practice in animal welfare regulation, including a compliance regime based on standards prescribed by regulation, and if necessary recommend appropriate legislative amendments.
4. Make recommendations on how compliance with the Act can be promoted, including consideration of the prosecutorial framework, and if necessary recommend appropriate legislative amendments.
5. Advise the Minister on any other matters relevant to the operation and effectiveness of the Act.

**Name \***

First	Last
-------	------

**Company/Agency/Association (if relevant)**

**Email \***

**Address \***

City	State / Province / Region
------	---------------------------

Postal / Zip Code	Australia ▼
-------------------	-------------

**Phone \***

**Written submission \***

**Document submission (optional)**

Upload or drag files here.

Word and PDF format only.

Submit



## APPENDIX 2 – TERMS OF REFERENCE OF THE REVIEW

1. Determine whether the objects of the Act reflect and promote contemporary best practice in animal welfare, such as recognition of the ability of animals to express innate behaviours and, if necessary, recommend appropriate legislative amendments.
2. Identify any impediments to the effective enforcement of the Act and any related regulations, with specific attention to the powers of inspectors and the prosecution of offenders.
3. Consider amendments to policies, standards and legislation to achieve contemporary best practice in animal welfare regulation, including a compliance regime based on standards prescribed by regulation and, if necessary, recommend appropriate legislative amendments.
4. Make recommendations on how compliance with the Act can be promoted, including consideration of the prosecutorial framework and, if necessary, recommend appropriate legislative amendments.
5. Advise the Minister on any other matters relevant to the operation and effectiveness of the Act.

## APPENDIX 3 – PRO-FORMA LETTERS

### Pro-forma 1

I am writing to give feedback on the *Animal Welfare Act 2002* to help improve the work of RSPCA WA Inspectors, and better protect animals in WA.

1. Put a positive duty of care on people in charge of animals to provide for the animals' fundamental welfare needs, with a breach of this duty constituting an offence.
2. RSPCA WA Inspectors must be given the power to issue infringement notices for minor offences – with offenders ordered to pay a fine without going to court.
3. Improve the powers of entry for Inspectors to make it easier for them to do their job protecting animals. Inspectors must be able to check compliance with direction notices and court-issued prohibition orders; help distressed animals; inspect facilities where animals are kept for commercial purposes at any time; and check compliance with animal welfare regulations.
4. The onus must be placed on owners to reclaim their abandoned animals from RSPCA WA following a seizure.

I look forward to seeing recommendations from the panel that reflect the community's views on animal welfare.

### Pro-forma 2

Please find further points below as to my recommendations for the review.

1. Enable prosecution for the unreasonable killing of an animal.  
It should be unlawful to kill an animal as an act of violence, retribution, entertainment and/or amusement.
2. Impose a duty of care on those in charge of animals  
RSPCA WA would like the Act to put a positive duty on people in charge of animals to provide for the animals' fundamental welfare needs with a breach of this duty possibly constituting an offence. This will ensure the community is aware of what is required for the proper treatment of animals.
3. Give RSPCA WA Inspectors power to issue infringement notices  
The power to issue infringement notices for minor offences increases enforcement options and compliance with the Act. If an infringement notice is issued, the offender would pay a fine without going to court. RSPCA WA Inspectors would still prosecute more serious offences through the court system.
4. Give Inspectors improved powers of entry  
Currently, Inspectors can only enter a property in circumstances relating to a cruelty offence or with notice or consent from the person in charge. Improving powers of entry would make it easier for Inspectors to:
  - Ensure people are complying with direction notices;
  - Ensure people who are prohibited by a court order from being in charge of animals are not breaching that prohibition;
  - Enter a property to assist distressed animals. For example, if a dog is seen caught stuck in the fence or otherwise at risk;

- Inspect facilities where animals are kept or used for commercial purposes at any time as they can under NSW animal welfare laws; and
- Check compliance with animal welfare standards.

5. Make owners responsible for reclaiming their abandoned animals

Currently, when an inspector seizes an animal due to abandonment, the inspector must bring a civil application before the courts to forfeit the animal to the Crown so it can be rehomed (where appropriate). This process takes time and incurs considerable cost. Instead, the onus should be placed on the owner to respond to the inspector within a specific time frame or the animal will be automatically forfeited to the Crown.

### **Pro-forma 3**

My concerns relate to the following aspects of the Act:

1. Incomplete consideration of good animal welfare

The latest research in the area indicates that good animal welfare goes beyond basic survival and means providing animals with a life worth living by minimising negative experiences and maximising positive experiences. The current Act does not reflect this.

This is particularly relevant to the greyhound racing industry and horse racing industry, where socialisation and other mental health considerations have consistently been found lacking.

I suggest the Act be amended to incorporate the principals of the Five Domains model which provide a means of evaluating the welfare of an individual or group of animals in a particular situation, with a strong focus on mental well-being and positive experiences. These domains are:

- Nutrition
- Environment
- Health
- Behaviour
- Mental state

2. Overly generous defences

To be effective, animal welfare laws must be applied equally to all animals. The current Act provides various defences, including if an offence was done “in accordance with a generally accepted animal husbandry practice” and “in accordance with a relevant code of practice”. These defences effectively preclude several classes of animals from many of the provisions of the Act, including greyhounds in the greyhound racing industry.

Animals in the racing industry are frequently subjected to things that would be considered an offence if done by companion owners, such as housing conditions, transport methods and conditions and use in a manner that is likely to cause unnecessary harm. The community's expectations when it comes to animal welfare are evolving and these defences are no longer considered appropriate, particularly when it comes to racing greyhounds.

I suggest these provisions be removed and the Act applies equally to all animals regardless of their status.

### 3. Limited access rights

Random audit/inspections are a vital part of any compliance regime. The current Act only allows for entry into premises for inspection in very limited circumstances, generally where there is a suspicion of noncompliance with the Act. Compliance with any act is directly related to how well it can be enforced - without the ability for random audit/inspection it follows compliance with the act will be impaired.

It was revealed in the Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales that racing industry participants were 'tipped off' when 'random' audits/inspections were to occur by the racing industry and this has often been a concern for the community in WA.

I suggest the Act be amended to allow for random audit/inspections by the organisation responsible for administering it, independent of the industry the animal is in.

### 4. Regulatory Capture

Regulatory capture occurs when the same agency is charged with maximising the profitability of an industry as well as regulatory enforcement and protecting the welfare of animals. It is a situation commonly occurring in animal industries including the greyhound racing industry in WA and with the responsibility of this Act - which sits within the Department of Agriculture which is also responsible for promoting the animal agriculture industry.

When regulatory capture occurs the confidence in the community of the impartial application of the Act is impaired and research also shows that for proper enforcement of any law it must be free from conflicts of interest.

I suggest an independent government office for animal welfare be created which becomes responsible for the administration and compliance with the Act. This office would be responsible for all matters pertaining to animal welfare for all animals in WA.

## **Pro-forma 4**

The Act is clearly outdated and needs to be overhauled rather than amended.

Animals in commercial operations should be afforded the same consideration and rights as domestic animals – to be free from suffering, to have medical procedures performed pain free and to be able to exhibit natural behaviours.

Scientific experimentation on animals should be banned.

There should be an independent office of Animal Protection instituted, rather than relying on a charitable organisation like the RSPCA to regulate animal welfare and enforce fines.

Penalties for animal abuse need to be increased and enforced more regularly to act as a deterrent and ensure compliance.

Increase the powers for inspectors – to be able to deliver on the spot fines for minor breaches. Camera surveillance of commercial operations should be mandatory to ensure compliance.

Unannounced inspections of commercial facilities should be able to occur.

More detail about these and other concerns follows:

### FINES

The act should stipulate clear fines and enforceable penalties for breach of WA AWA regulations in line with other states.



## INCREASED POWERS AND ACCESS FOR ANIMAL WELFARE INSPECTORS

Inspectors should have more power to routinely inspect abattoirs and farms and issue on the spot fines for minor offences or court proceedings for major offences.

## DUTY OF CARE

The Act must include a statement of duty of care that persons in charge of an animal must be responsible for the basic needs of an animal. A breach of this duty of care must constitute an offence. The duty of care must recognise that animals are sentient beings and deserve to be free from pain, treated for injury or illness and allowed to undertake natural behaviours with minimal confinement.

## EXPAND SPECIES COVERED

The Animal Welfare Act 2002 must expand its application to invertebrates, fish, decapods and cephalopods. For example, the Victorian POCTA 1986 covers fish and some decapods.

The Act or subsidiary legislation must ensure that fish, decapods and cephalopods must be insensible before being killed. For example, the practice of boiling crustaceans alive must be prohibited.

## HARM- SEVERE REACTIONS

An animal's right to be free from harm should be enforced in the regulations and a breach of these rights should be a punishable offence.

- In the Act, harm is defined as follows:

s5 Harm" includes - (a) injury; and (b) pain; and (c) distress evidenced by severe, abnormal physiological or behavioural reactions"

Remove "severe"-In a humane society, we should not have to wait till an issue is severe before taking action.

## TRAINING AND ACCREDITATION

The Act must ensure that methods of killing are restricted to guns or the animal must be stunned prior to killing. Farmers, personnel at aggregation points, transporters, peri-urban and urban property owners with livestock, backyard livestock owners, hunters must be trained and accredited by recognised provider.

## ROUTINE INSPECTION OF ANIMALS INSPECTIONS OF LIVESTOCK

Animals in any farming business must be inspected daily to ensure that animals are not injured or ill. For less intensive operations and larger landholding the time frame should be at least once weekly for cattle and once every two days for sheep.

## TRANSPORT

Under the Act Part 3-Division 3 s19(3); A person is cruel if an animal "is transported in a way that causes, or is likely to cause, it unnecessary harm; "

The Act or its subsidiary legislation must be more CLEARLY DEFINED AND NOT OPEN TO INTERPRETATION and ensure that animals are not transported in the following conditions

- animals unable to independently walk by bearing weight on all legs

- not able to stabilise themselves during transport
- dehydrated, injured or distressed
- who have conditions that are likely to cause increased pain or distress during transport
- who are blind in both eyes
- who are within 4 weeks of parturition or within 7 days of having given birth, or lactating;

The Act or subsidiary legislation must ensure that vehicles involved in transport must have specified ventilation, adverse weather protection including rain, extremes of heat and cold for each species of animal.

The Act or subsidiary legislation must ensure that livestock must be able to stand up or lie down freely when transported.

Legislation must require that all consignments of animals must contain documentation specifying the date, time, and duration livestock loaded last had access to water and risk management including time and place of spells stops to check on animals and contingency plans for emergencies.

#### CONFINEMENT OF ANIMALS:

Animals should be permitted to engage in natural behaviours. 'Free range' standards should be clearly stated and enforced.

Sow stall should be prohibited for pigs.

Maximum density stocking should be stipulated to ensure animals are not starving or without water.

If animals are found to be in poor condition as a result of the above then specific fines should be applied.

#### DAILY PROVISION OF FOOD AND WATER

Under the Act Part 3-Division 3 s19(3)(d):

The cruelty provisions must include that a person must provide water at all times and food must be provided daily, in sufficient quantity and species appropriate quality to meet and maintain physiological and mental health.

#### SHADE AND SHELTER

- Under the Act, Part 3-Division 3 s19(3)(e) A person is cruel if an animal "is not provided with such shelter, shade or other protection from the elements as is reasonably necessary to ensure its welfare, safety and health";
- The community expects that animals will not suffer from sun exposure, wind chill, rain exposure and cold. This must ALSO apply to cattle and sheep on all farms including rangeland systems as well as cattle in feedlots. Shelter, shade and protection from elements during transport of animals must also be prescriptively addressed.

#### REASONABLE STEPS

- In the Act, S19 3(h) states that a person is cruel if an animal "suffers harm which could be alleviated by the taking of reasonable steps" This is open to interpretation.
- The above law must be rewritten to ensure that harm is alleviated by a prescribed method of euthanasia or professional help must be sought for treatment.



## ELECTRIC PRODDERS

The Regulations accompanying the Act allow the use of the electric prod on cattle, sheep, goats and horses, buffalo and camels. The Regulations must be changed to prevent prod use on sheep, goats and horses of any age as well as calves and piglets i.e. animals who are less than 1 year old be prohibited in line with the OIE Terrestrial code which are the minimum animal welfare standards a country should adhere to.

The New Zealand Animal welfare (Care and Procedures) Regulations 2018 have banned the usage of prodders on sheep, goats and horses. It may be only used on cattle and pigs if they are over 150kg.

## PIG DOGGING

The updated Act must prohibit the use of dogs to hunt animals where the dog is used to fight, injure or kill another animal.

Pig dogging is prevented by Victorian, ACT and SA legislation.

## "PESTS"

The Act must prohibit the possession and use of traps for pest animals including glue traps, all jawed traps including leg hold, foot hold soft/padded and metal jawed traps, snare traps, no-kill snare trap, confinement traps, kill traps, lethal traps and net traps.

The use of glue traps for animals are prohibited in the draft Victorian POCTA Regulations 2019. Jawed traps including soft jawed traps are prohibited in the ACT. Fertility control is advocated by RSPCA for control of animals. Even the Humane Matrix developed under the Australian Animal Welfare Strategy (AAWS) classifies trapping as extremely inhumane. The use of poisons and viruses is also classified as significantly inhumane. If fertility control is currently unavailable, ground shooting to the head is recommended as the most humane control method.

The following regulations from the draft Victorian Regulations 2019 must be included in the Act or subsidiary legislation.

## ANIMALS IN VEHICLES

- A person must not place or transport an animal in the boot of a sedan motor vehicle.
- A person must not leave an animal unattended inside a motor vehicle, for more than 10 minutes, when outside temperatures are at or above 28 degrees Celsius.

## MULESING

- A person must not mules a sheep unless the sheep is administered pain relief with a product that has been registered for use on sheep by the Australian Pesticides and Veterinary Medicines Authority.

## OTHER DEVICES

- A person must not use a mouthpiece on a horse if the mouthpiece is of a design that is twisted at the point where the device is in contact with the bar of the horse's mouth.
- A person must not use a pronged collar on any animal.
- A person must not use an Oxy-LPG pest-control device unless the person has made all reasonable efforts to empty the warren of live rabbits using other methods.



## HIGHER STANDARDS

Animal welfare organisations like RSPCA and Animals Australia have pointed out the failure of the current and draft National Standards and Guidelines to meet long overdue community expectation of higher welfare for animals.

In light of the above, the community expects that basic protections like provision of food and water, shelter, prompt treatment and pain relief is available to animals and calls on the Government to legislate higher welfare standards.

## PAINFUL PROCEDURES

- The use of electro-Immobilisers must be banned
- Hot Branding and Caustic Chemicals branding must be banned.
- No castration without pain relief for cattle over 3 months.
- Burdizzo clamps and tension banding must be prohibited.
- Rubber rings must be restricted to calves under 2 weeks of age.
- Disbudding and Dehorning of cattle must be carried out with pain relief,
- Cattle must be dehorned before 6 months of age.
- Use of caustic chemicals to disbud must be banned.
- Pain relief for all spaying/webbing and a ban on flank spaying or webbing.
- Spaying must be carried out by veterinarian or recognised accreditation.
- Mature cattle must passage webbed.
- Tail docking of cattle is prohibited, except where It is the only suitable treatment for injury or disease, as diagnosed by a registered veterinarian, and pain relief is administered;
- Tail docking and castration of sheep must be used with available and registered pain relief at all ages. Tail docking by ring or hot blade must be used unless tail is too large in which case sharp knife may be used.
- Hot blade de-beaking of poultry must be banned.
- Pigs must not be castrated without pain relief.
- Mulesing must not occur without pain relief.
- A person must not perform surgical embryo transfer and laparoscopic insemination of sheep without using pain relief.

## APPENDIX 4 – LIST OF RESPONDENTS

The Panel received written submissions from the following respondents. The Panel may publish submissions or extracts from them, excepting where respondents requested confidentiality.

No.	Submitter Surname	Submitter First Name
001	HIGGS	Christine
002	SMITH	Hunter K
003	MCDONALD	DK & AA
004	WA POLICE UNION	
005	HING	Stephanie
006	GARRETT	Claire
007	HENRY	Noah
008	FISHER	Allan
009	GATH	Peter
010	VOSS	Jennifer
011	DUFFY	Janine
012	LAMB	Stephanie
013	CROSS	Joan
014	PIETSCH	Mary-Anne
015	DREWITT	J
016	LAVELL	-
017	CULVERHOUSE	Glenn
018	NORTHCOTT	Sharon
019	NOBLE	Susan
020	RUBY BENJAMIN ANIMAL FOUNDATION	
021	ING	Teresa
022	KINKEAD	Jeanette
023	DUYSTER	Suzanne
024	GREYHOUND ADOPTIONS WA	
025	MORANDINI	Hugo
026	BAKER	Lisa
027	ANIMAL JUSTICE PARTY	
028	YARNALL	Melanie
029	WEST AUSTRALIAN DINGO ASSOCIATION	
030	EGG FARMERS AUSTRALIA	
031	CONFIDENTIAL	
032	MARDEWI	Yoke
033	ANIMALS' ANGELS	
034	MURDOCH UNIVERSITY ANIMAL ETHICS COMMITTEE	

No.	Submitter Surname	Submitter First Name
035	SINCLAIR-IVEY	Kim
036	COMMERCIAL EGG PRODUCERS ASSOCIATION	
037	WA FARMERS DAIRY COUNCIL	
038	RAKELA	Peta
039	ANDERSON	Martina
040	DOWNES	Lyn
041	HARTRIDGE	Anita
042	COOK	Shirley
043	ROSSI	Lisa
044	KING	Viktoria
045	LOPEZ	Kenneth
046	MEHTA	Ruki
047	CONFIDENTIAL	
048	ERROL	Vanessa
049	EDWARDS	Lana
050	MIRCO	Sue
051	CURTIN UNIVERSITY ANIMAL ETHICS COMMITTEE	
052	HENSON	Debbie
053	-	Kylie
054	BRUCE	Lisa
055	REID	Pamela
056	TREHARNE	Patricia
057	MCCULLOUGH	Rennie
058	HOSKING	Richard
059	BOYLAND	Susan
060	VITALICH	Vanessa
061	WINTERBOTTOM	Jennifer
062	GAUNTLETT	Lynn
063	COUPAR	Kerry
064	PARSONS	Jaclyn
065	WILLIAMS	Jo
066	WALTON	Gay
067	HYNES	Franklin



No.	Submitter Surname	Submitter First Name
068	SCOTT	John
069	JONES	Ron
070	DOOGUE	Shelly
071	WILKINSON	Mel
072	PASS	Wendy
073	GODKIN	Sarah
074	ST QUENTIN	Marian
075	FELIX	Kyley
076	SMITH	Aimee
077	NO NAME PROVIDED	
078	WINTERBOTTOM	Jason
079	HARRISON	Mel
080	ALLEN	Dale
081	LIDBURY	Emma
082	BOULTON	Callum
083	DAGLEISH	Claire
084	HAMBLEY	Mika
085	FITZGERALD	Sasha
086	MARRIOT	Tanya
087	-	Ricky
088	PASTORALISTS AND GRAZERS ASSOCIATION, WESTERN AUSTRALIA	
089	YEEDA	Robin
090	SMITH	Madeline
091	HYNES	Franklin
092	NO NAME PROVIDED	
093	CURCIARELLO	Bruce
094	HOWARD	Garry
095	FLEMING	Pamela
096	COATES	Sarah
097	MANDERSON	Roz
098	LILLEE	Helen
099	KNIGHT	Julie
100	BANCROFT	Judith
101	HARRISON	Marilyn
102	HO	Anne
103	-	Jan
104	GIANCONO	Kaitlin
105	KING	Gillian

No.	Submitter Surname	Submitter First Name
106	ADAMSAU	Linda
107	MULCAHY	Wayne
108	TARRANT	Stephanie
109	WILSON	Jacki
110	AMBROSIUS	Gai
111	EATON	Chris
112	ROBINSON	Roz
113	BIGBIRD	Jan
114	ROSE	Garry
115	WINTERS	Jane
116	HILL	Jennifer
117	LAWTON	Michelle
118	WALLACE	Noel
119	INGHAM	Janet
120	EDWARDS	Lana
121	-	Marlene
122	-	Stephi
123	MULEY	Marlene
124	BROWN	Kellie
125	BEELITZ	Tarryn
126	ERROL	Vanessa
127	DICANDILO	Zhana
128	CONSTABLE	Pippa
129	COMI	Connie
130	ARMSTRONG	James
131	MCKEIVER	Sonia
132	-	Anthony
133	JACKSON	Vicki
134	JACKSON	Vicki (Same submitter as #133)
135	BEST	Julie
136	NO NAME PROVIDED	
137	COOKE	Alexandra
138	ALLEN	Ciara
139	MAJID	Irene
140	HUNTER	Bev
141	REHFELDT	Liz
142	LIM	Laurence
143	KRASENSTEIN	Leon

No.	Submitter Surname	Submitter First Name
144	NO NAME PROVIDED	
145	YOUNG	Paul
146	NO NAME PROVIDED	
147	CATER	Adam
148	HUTTON	Maureen
149	STERGIOU	Matthew
150	ABBONDANZA	Naomi
151	NO NAME PROVIDED	
152	MARTINEZ	Cheyenne
153	HANNELLY	Toni
154	MCDONALD	Lyn
155	-	Paul
156	HART	Iris
157	CARR	Andrew
158	SIMPSON	Jennifer
159	CREDARO	Julie
160	MCLEAN	Caron
161	WATSON	Winella
162	ANDERSON	June
163	BRINKWORTH	Joanne
164	BRONOWICKA	Marta
165	TAN	Lee Jin
166	PEARCE	Wendy
167	MOIR	Alex
168	DAVIES	Robyn
169	MCKENNA	Alison
170	JOWETT	Susan
171	-	Christine
172	KARPINSKI	Andrej
173	COBLE-NEAL	Fiona
174	LUNDY	Judy
175	PAYNE	Kailey
176	JACKSON	Jacqueline
177	MCCALL	Gill
178	PARKIN	Alice
179	HARRIS	Lyn
180	GILLIS	Joan
181	CARDER	Caroline
182	PARKES	Nigel and Alison

No.	Submitter Surname	Submitter First Name
183	MAUDE	Florence
184	NORGAARD-PEDERSEN	Sue
185	-	Heidi and Glen
186	RAWNSLEY	Sandie
187	DYBALL	John and Sharon
188	NO NAME PROVIDED	
189	OGDEN	Lisa
190	KOFFEL	Peter
191	THOMAS	Susannah
192	WEAVER-SAYER	Tracy
193	ALLEN	Jenny
194	MCGILL	Rhona
195	MOYLE	Julie-Anne
196	DIAS	Adam
197	SANDELL	Caroline
198	EGERTON	Charles
199	FORBES	Rowena
200	KENNEDY	Patricia
201	BROWN	Maureen
202	OWEN	Tracy
203	KINGSTON	TK
204	BEATON	Desmond
205	MACDONALD	Jennie
206	WINER	Hugh
207	RAWLINGS	Susan
208	JONES	Sue
209	SLOAN	Michaela
210	FITZMAURICE	Allison
211	BROWN	Janet
212	POTTER	Cherie
213	CLENDENNING	Diane
214	HOLLAND	Shana
215	HUMBLE	Alexander
216	DUVDEVANI	Nili
217	MERA	Sheryl
218	DRAPER	Hollie
219	TERNENT	Katie
220	CONSTANT	Roseanne

No.	Submitter Surname	Submitter First Name
221	JONES	Barbara
222	NO NAME PROVIDED	
223	CRANSWICK	Sally
224	MORLEY	Jan
225		Jarrah
226	HOLLONDS	Angie
227	HAMID	Carol and Sadak
228	DELAVALLE	Elizabeth
229	TURNLEY	Jean
230	LUCAS	Carel
231	FRANKLIN	Susan
232	SHERIDAN	Colleen
233	MELLOR	Julie
234	MOORE	Josie
235	BRENNMAN	Janet
236	FIRTH	Lesley
237	AINSWORTH	Hazel
238	COLE	Tiffany
239	HENDERSON	Lucibel
240	COWBOY	Ronnie
241	WA HORSE COUNCIL	
242	LUO	Emily
243	GREENAWAY	Kallum
244	DEPARTMENT OF EDUCATION SCHOOLS ANIMAL ETHICS COMMITTEE	
245	VETERINARY SURGEONS' BOARD OF WA	
246	HALBERT	Pam
247	STAERKER	Fiona
248	PECK	Kymette
249	WHITFIELD	Leonie
250	TALBOT	Lily
251	MARTIN	Vera
252	RUUL	Wendy
253	JACKSON	Neil and Sandy
254	-	Steve and Tina
255	WALSH	Christina
256	CRASKY	Olwyn
257	FEELY	Geraldine
258	PAVY	Erin

No.	Submitter Surname	Submitter First Name
259	WORNER	Suzanne
260	LAND	Vanessa
261	CAT HAVEN	
262	TORLACH	Sue
263	BRIEDEN	Cornelia
264	BRIEDEN	Katharina
265	BRIEDEN	Thomas
266	BRIEDEN	Thomas (Same submitter as #265)
267	BENAISE	Karen
268	MARKOVICH	David
269	JONES	June
270	CAINE	Cindy
271	-	Cheryl
272	GLANFIELD	Margaret
273	EILS	B
274	ALLAN	Michele
275	OATES	Kara
276	WALKER	Richard
277	MORRIS	Bethani
278	FIRTH	Sophie
279	-	Elly
280	AUSTRALIAN FEDERATION FOR LIVESTOCK WORKING DOGS	
281	SHEARN	Harrison
282	PETIT	Louis
283	SALTMARSH	Leanne
284	ROBERTS	Wendy
285	-	Cal
286	MORRIS	Bethani (Same submitter as #277)
287	SALTMARSH	Leanne (Same submitter as #283)
288	ROBERTS	Wendy (Same submitter as #284)
289	ROBERTS	Wendy (Same submitter as #284)

No.	Submitter Surname	Submitter First Name
290	CRISTIANSEN	Alanna
291	HALL	Pamela
292	BUCKLAND	Karen and Ray
293	WIGUNA	Annette
294	UNIVERSITY OF WESTERN AUSTRALIA	
295	WILSON	Clarissa
296	FARMAN	Sam
297	FITZGERALS	Jason
298	CONFIDENTIAL	
299	ANIMALS' ANGELS	
300	CONFIDENTIAL (SAME SUBMITTER AS #298)	
301	LOCKHART	Deborah
302	HUMANE SOCIETY INTERNATIONAL	
303	KIEFER	Kimberly
304	FREE THE HOUNDS INC	
305	MASS	Nina
306	PRICE STEPHEN MLA	
307	ANIMALS AUSTRALIA	
308	DAVID	Bronwyn
309	CAMPBELL	Linda
310	ROBERTS	Wendy (Same submitter as #284)
311	ADLEY	Isabel
312	SAKLANI	Ruchita
313	ARMSTRONG	Marji
314	RSPCA WA	
315	MADLE	Emma
316	ANIMAL WELFARE COALITION WA	
317	CAINE	Cindy (Same submitter as #270)
318	BOLIVER	Chanelle
319	OSBORNE	Deborah
320	VINES	Deanne
321	BROWN	Gillie
322	GUY	Lisa
323	TALLENTIRE CHRIS MLA	
324	MATTHEWS	Peter

No.	Submitter Surname	Submitter First Name
325	BLACKERS	Christine
326	VANSTEIN	L
327	DIRECT ACTION EVERYWHERE	
328	EHLERS	Cooper
329	RSPCA AUSTRALIA	
330	TUTEN	Simone
331	RICHARDSON	Theresa
332	XAMON ALISON MLC ON BEHALF OF GREENS WA	
333	ISAAC	Rory
334	ANIMAL MANAGEMENT IN RURAL AND REMOTE INDIGENOUS COMMUNITIES	
335	CLARKE	Lisa
336	ROTH	Shelley
337	KITCHING	Pauline
338	AUSTRALIAN VETERINARY ASSOCIATION	
339	KILMINSTER	Marlene
340	REC FISHWEST	
341	ROGERSON	Christine
342	WADDINGTON	Kevin and Katherine
343	DEPARTMENT OF BIODIVERSITY, CONSERVATION AND ATTRACTIONS	
344	PET INDUSTRY ASSOCIATION AUSTRALIA	
345	NATIONAL FARMERS FEDERATION	
346	KIMBERLY PILBARA CATTLEMENS' ASSOCIATION	
347	WA FARMERS FEDERATION	
348	WESTERN AUSTRALIAN PORK PRODUCERS ASSOCIATION INC	
349	LIVESTOCK AND RURAL TRANSPORT ASSOCIATION OF WESTERN AUSTRALIA INC	
350	CONFIDENTIAL	
351	LAY	Belinda