***[enter your first name]***

***[enter your suburb, postcode and state]***

Legislative Reform Team
Department of Jobs, Skills, Industry and Regions
1 Spring St, Melbourne
Victoria 3000

By online submission: <https://engage.vic.gov.au/project/new-animal-welfare-act-victoria/page/make-a-submission-on-the-draft-bill>

**Submission on the draft Victorian Animal Care and Protection Bill**

Dear Legislative Reform Team,

I am writing to provide feedback on the draft Animal Care and Protection Bill.

Firstly, I commend you on recognising that all animals are sentient as part of this new Bill.

**Feedback on the wording of the draft Bill**

1. The words ‘approved industry arrangements’ and ‘exceptions’ will exclude millions of farmed animals, animals used in entertainment, ‘sport’, animals used in scientific research, and our state’s wildlife, from receiving protections from cruelty under this Bill. It exposes them all to cruel acts and practices and undermines the principles of the new Bill.
* I request you remove these terms and any other language that allows animals to be treated differently or exempts them from protections based on human or industry use

Industry certified and accredited schemes, as well as co-regulation, often lack effective monitoring by responsible authorities, leaving countless animals vulnerable to suffering.

* To safeguard animals from cruel practices permitted by industry certification and co-regulation, it is imperative to eliminate blanket exceptions for ‘industry approved arrangements’ from this Bill.
* Instead, the focus should be on establishing legally binding regulations that prioritise animals’ interests over industry interests.

Exceptions for animals to be killed via the administration of substances i.e., poisons (*Part 5, Division 4, number 75*) effectively permits the violent death of thousands of native animals, including quolls and the dingo, by 1080 poison. 1080 poison should be prohibited in Victoria and exceptions for ‘controlling pest animals’ and carrying out activities under the ‘Catchment and Land Protection Act 1994’, must be removed.

**Feedback on the Act, Standards and Guidelines, and Codes of Practice.**

I commend you for making some aspects of the Codes of Practice mandatory. This is a welcome intention.

But the following standards and guidelines, and codes of practice, need significant updates to give animals improved protection from cruelty. Through the Act, Codes of Practice and/or Regulations, I urge you to:

1. Improve the welfare of pigs, **prohibit the use of sow stalls and farrowing crates for mother pigs** *(Pig Welfare Standards and Guidelines).*
2. **Phase out the cruel procedure of mulesing sheep**. While Victoria is the only state to regulate pain relief for mulesing, it is a procedure that causes suffering long after the pain relief has worn off and must be prohibited. *(Code of Accepted Farming Practice for the Welfare of Sheep (Victoria) (Revision Number 3).*
3. Tail docking is an unjustifiable and painful mutilation that should never be performed on *any* animal.  **Please prohibit the cutting of tails of piglets, and cattle**. *(Pig Welfare Standards and Guidelines*,*) and Code of Accepted Farming Practice for the Welfare of Cattle).*
4. **Stop the practice of teeth cutting or ‘clipping’ piglets**. These are unnecessary and painful procedures, done without pain relief. *(Pig Welfare Standards and Guidelines).*
5. Please stop the following practices from being permitted in the Code of Accepted Farming Practice for the Welfare of Poultry:
	1. **Day-old male chick killing.**
	2. **Beak trimming of turkeys and layer hens.**
	3. **Battery cages for layer hens.**
6. Please **prohibit killing sick or injured piglets by blunt force trauma** from the Pig Welfare Standards and Guidelines.
7. **Mandate pain relief for any invasive procedure** including:
	1. **Dehorning cattle**
	2. **Castration of calves under 8 months old** without a veterinarian and pain relief. Both **must** be mandated
	3. **Branding (by burning, freezing or caustic chemical) of horses and cows without pain relief.** These are unnecessary and archaic methods that cause pain and suffering. Instead, mandate less painful alternatives. If alternatives are not available, these procedures must not be performed without pain relief.
8. **Prohibit** the following unnecessary, cruel, and unjust practices:
	1. **Use of electronic shock devices on any animals**
	2. **All types of snares and traps**
	3. **Immediately cease the forced swim test, and the forced inhalation test** for mice and rats, and **remove any other scientific testing of animals, where a non-animal alternative exists.**
	4. **Stop the use of flank straps, electric prods and any other methods** used to place horses and cattle used in rodeos into a state of fear, panic and pain, so they ‘buck’.
9. I commend the introduction of an Animal Welfare Fund. However, it is important that obvious conflicts of Interest that see industry interests put ahead of improving animal welfare are avoided.

I want to see the establishment of an **Independent Victorian Animal Welfare Authority** to be solely responsible for animal care and protection issues, making decisions that are first and foremost in the interests of all animals.

Thank you for considering my feedback.

Yours sincerely,

***[your name].***