

**Productivity Commission ‘Regulation of Agriculture’ Public Inquiry
Submission by Sentient, The Veterinary Institute for Animal Ethics**

Sentient welcomes the opportunity to submit to the Productivity Commission’s Regulation of Agriculture public inquiry. As an independent organisation of veterinarians and associates dedicated to advancing animal welfare and ethics based on scientific grounds, we strongly support the implementation of a national, independent animal welfare body and the government’s interest in basing animal welfare policy on scientific principles.

Specifically, we support the recommendations outlined in points 5.1 and 5.2 of the Draft Report, and propose that the independent body also be responsible for the enforcement of animal welfare legislation at a state level and as it relates to the live animal export industry.

With domestic and international trade as it stands, it is economically and legislatively appropriate for animal welfare standards to be consistent at a national level. It is also imperative that animal welfare legislative and enforcement responsibilities be separated from government agriculture and industry departments. This removes the inherent conflict of interest that exists when agencies responsible for administering and enforcing animal welfare legislation have, as their core business aims, the promotion and profitability of the industries they are attempting to regulate. For example, there have been numerous instances in the live animal export trade where the national Department of Agriculture has failed to implement penalties, such as loss of export licences, for serious breaches of the Australian Standards for the Export of Livestock (ASEL), and also of the Exporter Supply Chain Assurance System (ESCAS).

The proposed independent body should be governed by a full time staff member reporting directly to the Attorney General. The superior must not be the Minister for Agriculture given the aforementioned conflict of interest that is inherent in this portfolio. Staff members must be employed from an equal mix of agriculture/industry, animal welfare advocacy, and animal welfare and/or veterinary science backgrounds to prevent bias.

Responsibilities of the body should include, in addition to the development of national standards and guidelines:

- The live animal export industry;
- Enforcement of animal welfare legislation a state level;
- The funding of scientific research in animal welfare

Similarly, we are concerned about the proposals to replace some areas of governance with industry quality assurance schemes as this suffers the same risks of inherent bias. The only way to ensure the impartial enforcement of standards is through an independent body.

We are concerned about the reliance on community attitudes to guide decisions about animal welfare standards. Science, unencumbered by funding bias and based on sound statistical

analysis, is by definition the only robust means by obtaining facts. As a nation we pride ourselves on scientifically-rigorous decision-making and this context should be no different. Consumer attitudes are rapidly evolving as a result of social media and an increased connection with international events. There is a risk that cementing legislation on a brief snapshot of consumer trends will not adequately prepare Australia for the future. There are also concerns about accurate ways of gauging consumer interests - polling and qualitative studies based on individual self-reporting are historically unreliable.

We thank you for your consideration.

Dr. Katherine van Ekert

On behalf of Sentient, The Veterinary Institute for Animal Ethics