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Submitted via email: [AnimalWelfarePublicSubmissions@nre.tas.gov.au](mailto:AnimalWelfarePublicSubmissions@nre.tas.gov.au)

### **Re: Animal Welfare Amendment Bill**

Humane Society International (HSI) thanks the Department of Natural Resources and Environment Tasmania (the Department) for the opportunity to comment on the Animal Welfare Amendment Bill 2022 (Tas) (the Bill).

HSI is the world's largest conservation and animal welfare organisation with over 10 million supporters globally. We have more than 25 years' experience in Australia working to achieve an ecologically sustainable and humane world for animals. HSI is also a proud member of the Australian Alliance for Animals, which was recently formed to pursue critical reforms to animal welfare regulatory frameworks.

HSI welcomes many of the positive changes in the Bill, but at this stage of scientific progress and community debate on animal welfare we recommend far greater ambition.

In February 2013, the Tasmanian Animal Welfare Advisory Committee and the Department of Primary Industries, Parks, Water and Environment released a report (the 2013 report) following a review of the *Animal Welfare Act 1993* (Tas) (the Act).<sup>1</sup> The recommendations in the 2013 report were quite promising for their time, but many of them were not immediately implemented. This Bill serves to implement some of those recommendations, but because they are nearly 10 years overdue, the Bill will not sufficiently update the Act to align with today's community expectations and animal welfare science.

Tasmania should have progressed past these reforms to now be legislating against painful practices like the mulesing of lambs, intensive confinement systems like conventional battery cages for layer hens, lethal animal control methods like 1080 poison, and cruel forms of entertainment like duck hunting, rodeos, and greyhound and horse racing.

By now, the Act should outlaw harm to animals more broadly than physical pain or suffering alone, should recognise animal sentience, and should enshrine independent and robust structures and processes for enforcement, administration and the setting of animal welfare standards and guidelines.

We have set out our comments on the Bill in the table below. For ease of reference, we have adopted the wording of the Department's online submission form that summarises each of the changes.

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<sup>1</sup> Department of Primary Industries and Water and the Animal Welfare Advisory Committee, *Animal Welfare Act Review: Report and Recommendations* (Report, February 2013).



### **Amendment to section 3 (*interpretation*)**

The expanded definition of 'dispose' allows for all opportunities to manage animals.

- 1.1 HSI supports the amendment to s 3 to include a definition of 'dispose'. However, this support is subject to our comment below regarding the proposed s 17A, whereby a magistrate should only be able to make an order for euthanasia as a last resort and where in the best interests of the animal.

### **Amendment to section 3A (*care and charge of animals*)**

Statements that a specified person had, or has, custody, control or possession of a specified animal is admissible as evidence.

- 2.1 HSI supports the general intent behind the insertion of sub-s (1A) into s 3A of the Act.
- 2.2 The Department states that the new sub-s (1A) will 'amend the Act to reverse the onus of proof so that an animal is assumed to belong to the person named as the owner in any animal welfare complaint unless proven otherwise.'<sup>2</sup>
- 2.3 However, HSI questions whether the current drafting of sub-s (1A) does in fact achieve the desired result of a rebuttable presumption. A plain reading of the wording '....is admissible as evidence in any legal proceedings as evidence of the matter stated' appears only to make such an allegation admissible in proceedings under the Act, but not necessarily proven in the absence of evidence to the contrary. The current drafting also differs to that of a comparable but more clearly worded provision in South Australia's legislation.<sup>3</sup>
- 2.4 Further, the current drafting of sub-s (1A) is confined to sub-s (1)(b), being proof that a person had 'control, possession or custody of a specified animal'. The 2012 discussion paper that preceded the 2013 report stated that 'It can be difficult to prove *ownership* of an animal beyond reasonable doubt in spite of obtaining credible evidence of ownership'.<sup>4</sup> As such, HSI questions whether there are similar evidentiary issues in proving that someone is the owner of an animal under s 3A(1)(a) in circumstances where, for example, s 3A(1)(b) could not apply because the owner did not have control, possession or custody of the animal at the time of the relevant act or omission (for example, in a case of neglect).

- 2.5 For completeness, HSI submits that s 3A(1A) could be amended as follows:

*For the purposes of subsections (1)(a) or (1)(b), an allegation contained in a complaint for an offence under this Act that states that a specified person had, or has, ownership, control, possession or custody of a specified animal will be accepted as proved in the absence of proof to the contrary.*

### **Amendment to section 4 (*non-application of Act*)**

Clarification that certain activities do not apply to any animal research carried out in a licensed institution if that research is carried out with the approval of the Animal Experimentation Ethics Committee

- 3.1 HSI is strongly opposed to the proposed amendment to s 4(3). The amendment will serve to render the offences of baiting and shooting (s 10) and the use of animals to train other

<sup>2</sup> Biosecurity Tasmania, 'Draft Animal Welfare Act Amendment Bill' (Web page) <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>.

<sup>3</sup> Section 42(2) of the *Animal Welfare Act 1985* (SA) provides: 'An allegation in a complaint or an information that— (a) an animal was an animal of a specified species; or (b) a person was the owner of a specified animal, will be accepted as proved in the absence of proof to the contrary'.

<sup>4</sup> Department of Primary Industries and Water and the Animal Welfare Advisory Committee, *Animal Welfare Act Review: Discussion Paper* (August 2012) 19 (emphasis added) <https://nla.gov.au/nla.obj-1837903383/view>.

animals (s 11) inapplicable to conduct that occurs in the context of animal research.

3.2 The offences of baiting, shooting and using an animal to train another animal carry the same maximum financial penalties as that of *aggravated* cruelty (s 9). Conduct, therefore, that would otherwise be capable of contravening ss 10 or 11 cannot be tolerated in any context.

3.3 This proposed amendment contradicts the Minister's statement that the Tasmanian Government 'takes animal welfare very seriously' and that the Bill is 'further strengthening' the Act.<sup>5</sup> It should be removed from the Bill.

#### **Amendment to section 8 (*cruelty to animals*)**

Inclusion of the omitted word 'may', removal of redundant reference to the pest register and the ban of use of a pronged collar.

4.1 HSI supports the proposed amendments to s 8, particularly in relation to the ban of pronged collars.

4.2 However, s 8 should be further amended to prohibit the use of electric shock collars, such as anti-bark collars, remote training collars, and confinement collars. The 2013 report recommended that the use and possession of electronic shock collars be regulated,<sup>6</sup> which has not occurred to date. HSI contends that the inherent negative welfare implications of electronic shock collars cannot be regulated away, and that their use must be outlawed in Tasmania consistent with other Australian jurisdictions.<sup>7</sup>

4.3 The 2012 discussion paper also stated that pronged collars 'can inflict considerable discomfort, pain and even injury. Justification of their use is questionable given the range of effective alternatives available that have less potential to cause pain and discomfort.'<sup>8</sup>

4.4 This statement is equally, if not more, applicable to the practice of mulesing Tasmanian lambs.

4.5 **Mulesing** is an unnecessarily painful way to manage flystrike. It involves mutilation of the breech area, causing acute pain for at least two to three days, with pain/discomfort lasting up to several weeks.<sup>9</sup> The wound itself takes 5-7 weeks to heal,<sup>10</sup> during which time there are other negative implications such as weight loss, reduced socialisation, fear and human avoidance behaviours.<sup>11</sup> Even when mulesing is performed with pain relief, the most commonly used form, Tri-Solfen, is only applied post-cut. HSI considers it does not adequately cover the full duration of pain.

4.6 There is a humane alternative to mulesing all together, being the selective breeding of plain bodied sheep that have a low susceptibility to flystrike. This genetic solution is commercially viable and has been adopted by many Tasmanian producers.<sup>12</sup>

<sup>5</sup> Jo Palmer, 'Next step in providing greater protection for animals' (Media Release, 20 June 2022).

<sup>6</sup> Department of Primary Industries and Water and the Animal Welfare Advisory Committee, *Animal Welfare Act Review: Report and Recommendations* (Report, February 2013) 30 [12].

<sup>7</sup> See, for example, *Animal Welfare Act 1985* (SA) s 15; *Animal Welfare Regulations 2012* (SA) reg 8.

<sup>8</sup> Department of Primary Industries and Water and the Animal Welfare Advisory Committee, *Animal Welfare Act Review: Discussion Paper* (Report, August 2012) 16 <https://nla.gov.au/nla.obj-1837903383/view>

<sup>9</sup> AH Small, D Marini, T Dyal et al, 'A randomised field study evaluating the effectiveness of buccal meloxicam and topical local anaesthetic formulations undergoing surgical mulesing and hot knife tail docking' (2018) *Research in Veterinary Science* 118, 305-311; LE Edwards, 'Lamb mulesing: impact on welfare and alternatives' (2012) *CAB Reviews: Perspectives in Agriculture, Veterinary Science, Nutrition and Natural Resources* 7, 61.

<sup>10</sup> ML Lephherd, PJ Canfield, GB Hunt et al, 'Wound healing after mulesing and other options for controlling breech flystrike in Merino lambs: Observations on gross and microscopic wound healing' (2011) *Australian Veterinary Journal* 89, 27-37.

<sup>11</sup> LE Edwards, 'Lamb mulesing: impact on welfare and alternatives' (2012) *CAB Reviews: Perspectives in Agriculture, Veterinary Science, Nutrition and Natural Resources* 7, 61.

<sup>12</sup> See BG Economics, *Towards a Non-Mulesed Future* (Report, July 2020), available at [https://hsi.org.au/wp-content/uploads/2021/10/Towards-a-Non-Mulesed-Future\\_BG-Economics\\_July-2020.pdf](https://hsi.org.au/wp-content/uploads/2021/10/Towards-a-Non-Mulesed-Future_BG-Economics_July-2020.pdf).

4.7 In 2008, the Tasmanian wool industry 'proposed that surgical mulesing will be phased out by 2010.'<sup>13</sup> The fact that mulesing continues to occur in 2022 is a case in point that Tasmania needs to legislate a phase-out of mulesing that allows woolgrowers time to transition to a flystrike resistant sheep flock, with pain relief to be mandatory pre and post cut in the interim.<sup>14</sup> This Bill is an opportunity to implement that phase-out in s 8.

4.8 The 2013 report also recommended that s 8 be amended to clarify that 'pain or suffering' includes, but is not limited to, **distress, mental suffering and physical suffering**.<sup>15</sup> This is because, as the 2012 discussion paper highlighted, 'the term 'pain or suffering'... may not adequately capture the range of welfare impacts that the community would consider cruel.'<sup>16</sup> This recommendation was never implemented.

4.9 Community expectations and modern animal welfare science have progressed since 2013. Section 8 should proscribe conduct that leads to adverse outcomes for animals beyond that of 'pain or suffering'. New South Wales, for example, is moving to recognise the **broader concept of 'harm'** in its cruelty offence, which is defined to include distress, pain, physical and psychological suffering.<sup>17</sup>

4.10 As set out in the submission of the Australian Alliance for Animals on this Bill, s 8 should also include statutory criteria to guide the determination of whether harm to an animal was **unnecessary**, such as whether the act or omission was avoidable, or for a legitimate purpose. This change would provide more clarity and consistency in the determination of cruelty cases.

4.11 Moreover, modern animal welfare legislation recognises that animals are **sentient**.<sup>18</sup> We thank the Department for acknowledging the calls for sentience recognition, which the Department correctly defines as 'the ability to feel, or perceive, or be conscious, or have subjective experiences as distinct from the ability to reason, and that these qualities can be attributed to many animals.'<sup>19</sup> We point the Department to the submission of the Australian Alliance for Animals as to why sentience recognition is needed in the primary Act.

#### **Amendment to section 9 (*aggravated cruelty*)**

If a person is charged with but not found guilty of an offence under this section the person may be convicted of a lesser offence under section 8 if the evidence in the proceedings on the charge under section 9 establishes that the person committed an offence under section 8.

5.1 HSI supports the proposed amendment to s 9.

#### **Amendment to section 16 (*expanded power to enter, search and inspect premises*)**

An officer may, without warrant, enter, search and inspect any premises, other than premises or a part of premises being used as a dwelling, if the officer reasonably believes that there is on the premises –

(a) an animal in respect of which an offence under this Act has been, or is being, committed;

<sup>13</sup> *Animal Welfare Guidelines – Sheep* (October 2008) app 1, available at <https://nre.tas.gov.au/Documents/Animal-Welfare-Guidelines---Sheep.pdf>.

<sup>14</sup> Tasmania already mandates pain relief for the sterilisation of pigs, see *Animal Welfare (Pigs) Regulation 2013 (Tas)* reg 14. Pain relief for mulesing is already mandatory in Victoria, see *Prevention of Cruelty to Animals Regulations 2019 (Vic)* reg 8.

<sup>15</sup> Department of Primary Industries and Water and the Animal Welfare Advisory Committee, *Animal Welfare Act Review: Report and Recommendations* (Report, February 2013) 29 [3].

<sup>16</sup> Department of Primary Industries and Water and the Animal Welfare Advisory Committee, *Animal Welfare Act Review: Discussion Paper* (Report, August 2012) 11 <https://nla.gov.au/nla.obj-1837903383/view>.

<sup>17</sup> *Animal Welfare Bill (NSW)* cl 11.

<sup>18</sup> See Humane Society Australia, Submission No 94 to *Inquiry Into Animal Welfare Policy in New South Wales* (28 February 2022) 16, available at <https://www.parliament.nsw.gov.au/lcdocs/submissions/77539/0094%20Humane%20Society%20International%20Australia.pdf>.

<sup>19</sup> Biosecurity Tasmania, 'Draft Animal Welfare Act Amendment Bill' (Web page) <https://nre.tas.gov.au/biosecurity-tasmania/animal-biosecurity/animal-welfare/legislation-standards-guidelines/animal-welfare-act/draft-animal-welfare-act-amendment-bill>.

or

(b) an animal that is suffering or in need of assistance.

6.1 HSI supports the proposed amendment to s 16(1) in principle, as it would permit an officer to enter premises to assist an animal where an offence has not occurred, such as in flood or fire.

6.2 However, it is crucial that s 16 is amended to permit officers to enter, search and inspect dwellings where the urgency of the situation does not allow a warrant to be obtained under s 16(3). This approach has been adopted in the Northern Territory,<sup>20</sup> South Australia,<sup>21</sup> Queensland,<sup>22</sup> New South Wales<sup>23</sup> and the Australian Capital Territory.<sup>24</sup>

6.4 Further, s 16 does not adequately empower officers to monitor the welfare of animals used for breeding purposes, particularly where those animals are kept in dwellings.<sup>25</sup>

6.5 HSI therefore recommends that the Tasmanian government adopts the recommendations of the 2013 report to amend the Act to:

- Allow officers to obtain a warrant to enter, search and inspect a dwelling if they satisfy a magistrate or justice of the peace that they have a reasonably held belief that animals are kept on the premises for commercial purposes;
- Clarify that the phrase 'animals kept for commercial purposes' in s 16(2) includes animals kept for the purpose of breeding; and
- Allow officers to apply for a court order prohibiting a person from conducting breeding operations in certain circumstances.<sup>26</sup>

#### **Amendment to section 17 (*expanded power to take possession of animals*)**

Additionally, an officer may take possession of an animal and detain it in a safe place if the officer is satisfied that –

- (a) an offence under section 7 or 8 has been, is being, or is likely to be committed in respect of the animal; or
- (b) the animal requires medical treatment by a veterinary surgeon.

7.1 HSI supports the intention behind the proposed insertion of sub-s (1A). However, the drafting presents several problems. The section would read:

*(1) An officer may take possession of an animal and detain it in a safe place if the officer is satisfied that –*

- (a) an offence under this Act has been or is being committed in respect of the animal; and*
- (b) unless possession of the animal is taken –*
  - (i) its life will be endangered; or*
  - (ii) any pain or suffering it is undergoing will be unreasonably or unjustifiably prolonged.*

*(1A) In addition to subsection (1), an officer may take possession of an animal and detain it in a safe place if the officer is satisfied that –*

<sup>20</sup> [Animal Welfare Act 1999 \(NT\)](#) s 62(4)(c).

<sup>21</sup> [Animal Welfare Act 1985 \(SA\)](#) s 30.

<sup>22</sup> [Animal Care and Protection Act 2001 \(Qld\)](#) ss 122(1)(e), 122(1)(f). The [Animal Care and Protection Bill 2022 \(Qld\)](#) does not propose any lessening of these powers.

<sup>23</sup> [Prevention of Cruelty to Animals Act 1979 \(NSW\)](#) s 24E(2); [Animal Welfare Bill \(NSW\)](#) cl 67(1)(c).

<sup>24</sup> [Animal Welfare Act 1992 \(ACT\)](#) s 81(2)(d).

<sup>25</sup> HSI notes, for example, that an officer's power under s 16(2) to 'enter, search and inspect any premises where animals are sold, presented for sale, assembled or kept for commercial purposes' with Ministerial authorisation does not currently extend to dwellings due to the definition of premises in s 16(7).

<sup>26</sup> Department of Primary Industries and Water and the Animal Welfare Advisory Committee, *Animal Welfare Act Review: Report and Recommendations* (Report, February 2013) 42 [26]-[28].

- (a) an offence under section 7 or 8 has been, is being, or is likely to be committed in respect of the animal; or*
- (b) the animal requires medical treatment by a veterinary surgeon.*

...

7.2 This wording is unnecessarily complex and unclear. It would also not cover some situations, such as where:

- Someone is about to bait or shoot an animal (an offence under s 10) or use an animal to train another animal (an offence under s 11). This is because s 17(1)(a) is only enlivened if an offence has already been committed or is in the process of being committed, and because the pre-emptive wording 'is likely to be committed' in s 17(1A)(a) is limited to conduct that falls within ss 7 and 8.
- An animal is at risk by reason of flood or fire. This is because there is no relevant offence to enliven s 17(1) or s 17(1A)(a) and the animal does not yet require medical treatment to enliven s 17(1A)(b).

7.3 To address these shortcomings, we suggest that the two subsections be condensed as follows:

*(1) An officer may take possession of an animal and detain it in a safe place if the officer is satisfied that –*

- (a) an offence under this Act has been, is being, or is likely to be committed in respect of the animal; or*
- (b) the animal requires medical treatment by a veterinary surgeon; or*
- (c) there is a serious threat of injury or death to the animal.*

#### **New section 17A (*Court may order seizure or disposal of animals*)**

A magistrate may only make an order under subsection (1) in respect of an animal if the magistrate is satisfied that, without the order, the welfare of the animal is at risk. The full range of disposal options is available.

8.1 HSI supports the insertion of s 17A, provided that it is amended to specify that euthanasia may only be ordered as a last resort and where in the best interests of the animal.

8.2 We suggested above that s 16 be amended to allow an officer to apply for a court order prohibiting a person from conducting breeding operations in certain circumstances. We therefore also suggest that s 17A be amended to grant magistrates the power to make such an order.

#### **Amendment to section 24 (*power to kill animals*)**

Carcass disposal reduced from 7 days to 48 hours

9.1 HSI supports the proposal to change the holding period for a carcass from 7 days to 48 hours. The shorter timeframe is particularly important where appropriate storage for a carcass is not available, which may pose risks such as secondary poisoning to other animals.

9.2 HSI suggests that the wording of s 24(3)(a) is substituted with '... is to make the carcass available to the owner for inspection, if the owner makes such a request within 48 hours' and s 24(3)(b) is amended to 'may dispose of the carcass if there is no such request within 48 hours'. This would clarify that an officer need only facilitate an inspection of a carcass, but not hand over possession, where testing is required beyond 48 hours.

9.3 It would also not be appropriate for a person to have an animal's body returned to their possession where they are the subject of proceedings under the Act in respect of that animal. The section should incorporate such an exception.

### **Amendment to section 26 (*expanded power to require information from interstate residents*)**

10.1 HSI supports the proposed amendment to s 26.

### **Amendment to section 27 (*animal research definitions*)**

Exemptions expanded to include disease surveillance and monitoring, of an animal, that is conducted –

- (i) by a person for the purposes of disease identification or disease management; and
- (ii) in accordance with recognised methodologies and practices. This is in line with established animal use policy.

11.1 HSI is opposed to the use of animals in scientific procedures. We promote a methodological shift towards non-animal alternatives through a rigorous application of the 'Three Rs' (Reduce, Refine, Replace) principle.

11.2 Nonetheless, we support the clarification to s 27(1) that a licenced institution may only carry out animal research in accordance with the terms of the licence. However, it's important that a qualification is added to s 27(2)(a) so that an owner of an animal is only exempt in conducting an observational study where it will not lead to an adverse welfare outcome for the animal.

11.3 The drafting of the exemption in s 27(2)(b) is also broader than the recommendation in the 2013 report, which was limited to 'a disease management program approved by the Chief Veterinary Officer (in his or her statutory role under the *Animal Health Act*)'.<sup>27</sup> Given the breadth of the proposed exemption, a similar qualification is needed that conducting a disease surveillance/monitoring of an animal is only exempt where it will not lead to an adverse welfare outcome for the animal.

### **New section 41B (*abuse of animal research inspectors*)**

A person must not intimidate, threaten or abuse an inspector (research) to bring this protection in line with that of an animal welfare officer.

12.1 HSI supports the proposed insertion of s 41B.

### **Amendment to section 45 (*early costs and expenses recovery, including by the Crown*)**

13.1 HSI supports the insertion of sub-ss (1A) and (1B) in s 45.

## **Other comments**

HSI supports the submission of the Australian Alliance for Animals on the Bill, which sets out systemic changes needed to reform Tasmania's animal welfare legal framework. These changes include: establishing an independent Animal Welfare Authority, enshrining specific expertise in the membership of the Animal Welfare Advisory Committee, specifying decision-making criteria that must be followed in the development and adoption of animal welfare standards, guidelines and industry codes, introducing public reporting of compliance monitoring and enforcement activities, and requiring the use of CCTV in all Tasmanian slaughterhouses.

HSI also submits that Tasmania should legislate to:

- **Set an end-date for the use of conventional battery cages in egg production systems.** The *Animal Welfare (Domestic Poultry) Regulations 2013* (TAS) were an important step forward for layer hens in restricting any new caged egg systems. Almost 10 years on,

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<sup>27</sup> Department of Primary Industries and Water and the Animal Welfare Advisory Committee, *Animal Welfare Act Review: Report and Recommendations* (Report, February 2013) 22 [57].

Tasmanian caged egg producers have been afforded adequate time to transition to alternatives. It's time that the Tasmanian government acts on the draft recommendation of the Independent Panel on Poultry Welfare to phase-out conventional battery cages<sup>28</sup> with a legislated end-date.

- **Reinstate the ban on the use of 1080 poison.** The use of 1080 is unacceptable on conservation and animal welfare grounds. Studies have concluded that 1080 cannot be considered a humane poison.<sup>29</sup> There are effective, non-lethal stock protection methods that prevent interactions between wild canids and farm animals. Tasmania has already shown leadership in outlawing the cruel and ineffective lethal control methods of leghold traps, glueboard traps and snares in the primary Act.<sup>30</sup> It's time to extend that to outlawing the cruelty that is 1080 poison.
- **Prohibit cruel forms of entertainment, such as rodeos and horse racing** that exploit animals for profit and expose them to inherent welfare risks. In particular, the government ought to:
  - Act on the calls of thousands of Tasmanians and RSPCA Tasmania who want an **end to the publicly-funded and inherently cruel greyhound racing industry**;<sup>31</sup> and
  - Revise the state's wildlife laws to **prohibit the recreational hunting of native ducks** and other target and non-target species. As highlighted in a report by RSPCA Tasmania,<sup>32</sup> duck hunting presents a raft of unjustifiable welfare issues, particularly the high rate of wounding that leads potentially tens of thousands of ducks to suffer slow and painful deaths. The 'sport' is also untenable on conservation grounds – advice that departmental officers are said to have provided to the Minister in 2020 – as vulnerable populations of waterfowl seek refuge in Tasmania from climatic threats to their habitat on the mainland. Further, duck hunting damages Tasmania's reputation as a state that protects wildlife and pristine environments. Tourism to Tasmania is significantly reliant on that reputation being upheld.

While these issues have traditionally been dealt with in subordinate legislation, there is no legal impediment to their inclusion in the primary Act.

HSI thanks the Department for its consideration of our submission. Please don't hesitate to contact us on [mlappan@hsi.org.au](mailto:mlappan@hsi.org.au) or 02 9973 1728 for further information on any of our recommendations.

Yours sincerely,

  
Martine Lappan

Animal Welfare Law and Policy Campaigner

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<sup>28</sup> Independent Poultry Welfare Panel, *Draft Australian Animal Welfare Standards and Guidelines for Poultry* (March 2021) SB1.13, available at: [https://parlinfo.aph.gov.au/parlInfo/download/publications/tables/papers/f24e63d8-5fab-4736-b62a-0ca637a63a08/upload\\_pdf/OPD%201146\\_Redacted.pdf;fileType=application%2Fpdf#search=%22publications/tables/papers/f24e63d8-5fab-4736-b62a-0ca637a63a08%22](https://parlinfo.aph.gov.au/parlInfo/download/publications/tables/papers/f24e63d8-5fab-4736-b62a-0ca637a63a08/upload_pdf/OPD%201146_Redacted.pdf;fileType=application%2Fpdf#search=%22publications/tables/papers/f24e63d8-5fab-4736-b62a-0ca637a63a08%22).

<sup>29</sup> See T Sharp and G Saunders, Vertebrate Pest Research Unit – Industry & Investment NSW, 'A Model for Assessing the Relative Humanness of Pest Animal Control Methods' (2011); M Sherley, 'Is sodium fluoroacetate (1080) a humane poison' (2007) *Animal Welfare* 16, 449-458.

<sup>30</sup> *Animal Welfare Act 1993* (Tas) s 12.

<sup>31</sup> See RSPCA Tasmania, 'Greyhound Racing in Tasmania' (web page) <https://www.rspcatas.org.au/event/greyhound-racing-in-tasmania/>. See also the petition with 13,519 signatures: Tasmania, *Parliamentary e-Petitions*, House of Assembly, tabled 14 June 2022 (Cassandra O'Connor) available at <https://haepetitions.parliament.tas.gov.au/haepet/Home/PetitionDetails/98>.

<sup>32</sup> RSPCA Tasmania, *Duck Hunting Season 2021* (Issues Paper, January 2021) available at <https://www.rspcatas.org.au/wp-content/uploads/2021/01/RSPCA-Tasmania-duck-hunting-final-260121.pdf>