



QUEENSLAND FARMERS' FEDERATION

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Submission

6 June 2022

Mr Chris Whiting, MP
Chair
State Development and Regional Industries Committee
Parliament House George Street
BRISBANE QLD 4000

Via email: SDRIC@parliament.qld.gov.au

Dear Mr Whiting

RE: Animal Care and Protection Amendment Bill 2022

The Queensland Farmers' Federation (QFF) is the united voice of intensive and irrigated agriculture in Queensland. It is a federation that represents the interests of 21 peak state and national agriculture industry organisations and engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- EastAUSmilk (formerly QDO)
- Australian Cane Farmers Association (ACFA)
- Turf Queensland
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd
- Eton Irrigation Scheme Ltd
- Pork Queensland Inc
- Tropical Carbon Farming Innovation Hub
- Queensland Oyster Growers Association (QOGA)
- Lockyer Water Users Forum (LWUF).

The united voice of intensive and irrigated agriculture



QFF welcomes the opportunity to provide comment on the Animal Care and Protection Amendment Bill 2022. We provide this submission without prejudice to any additional submission from our members or individual farmers.

SUBMISSION

QFF broadly supports the changes and intent of the bill. Of importance is consistency of approach, protection of animals, understanding animal industries, high standards and training where acts of veterinary science are transferred to people without veterinary training. The strengthening of enforcement powers needs to be applied with a consistent and understanding compliance approach.

Facilitate the ethical use of animals for scientific purposes while protecting their welfare

There will be a potential lowering of welfare outcomes if provision is not made to ensure that operators are competent. The Scientific Code requires that operators are competent but leaves the assessment of competency undefined. Investigators must merely “ensure that procedures using animals are performed competently”. Also, the requirement that “provisions are made for the education, training and supervision of people nominated on the application, as appropriate” leaves it open to interpretation with no guidance. Ethics committees vary and are not in themselves as assessor of competency. Defining appropriate courses for investigators would standardise and limit the potential for adverse events.

Strengthen enforcement powers to address risks to animal welfare by clarifying or prescribing new offences.

QFF supports strengthening enforcement powers but in applying the new aggravated breach of duty of care provision, is trusting that enforcement and investigations will consider extenuating circumstances and will consider that lower body scores in situations such as drought does not mean that deliberate intent to ration feed supplies in these circumstances is not an offence provided of course that the animals are otherwise healthy.

Prohibit inhumane practices, such as the firing or blistering of the legs of dogs or horses, the use of Prong collars and the use of certain poisons on pest animals.

QFF supports

Create an approved accreditation scheme which will allow a non-veterinarian to perform certain procedures on cattle.

QFF supports provided standards are high (accuracy and technique) and there are meaningful audits to ensure competency. QFF notes that this will displace veterinarians from some farms which will lead to less veterinarians in rural areas and less surveillance leading to increased biosecurity risk at a time when there are world-wide outbreaks of disease present in Papua New Guinea and Indonesia.

Clarify legislation and remove redundant provisions.

QFF supports



Implement recommendations from the Martin Inquiry, including those relating to the monitoring of livestock slaughter facilities.

QFF supports but the wording of the livestock slaughter facilities has been interpreted differently by industry professionals. It is understood that this only applies to horses at this stage with provision to add other species slaughter facilities later. QFF is supportive of this provision if there is consultation with the different industries when/if this is extended to other species. QFF recommends a review of the wording so that it is clearly interpreted by all. QFF notes that greyhounds also had a review but is not included in this amendment bill.

Implement government-supported recommendations of the QAO report, aimed at strengthening the oversight of RSPCA inspectors.

QFF supports measures to ensure consistency in approach and compliance policy. It is important that both RSPCA and Biosecurity Qld inspectorate have the same approach and understanding of the livestock industries.

Thank you for the opportunity to contribute to this important bill. QFF does not request to speak at public hearings but is willing to do so if any clarification is required.

Yours sincerely

Jo Sheppard
Chief Executive Officer