

**Supplementary  
Submission  
No 160a**

**INQUIRY INTO VETERINARY WORKFORCE SHORTAGE  
IN NEW SOUTH WALES**

**Organisation:** Animal Care Australia

**Date Received:** 26 September 2023

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26<sup>th</sup> September 2023

Portfolio Committee 4

E: PortfolioCommittee4@parliament.nsw.gov.au

**RE: Inquiry into the veterinary industry workforce shortage in NSW**

Animal Care Australia would like to thank Portfolio Committee 4 for allowing us to appear as a witness at the Inquiry into the veterinary workforce shortage in NSW.

This Supplementary Submission is to provide responses to the questions on notice, and in addition we provide updated information to support our testimony and the questions posed to us during that testimony.

The Honourable Peter Primrose requested all witnesses review the 16 recommendations outlined within the Australian Veterinary Associations (AVA) submission (No 144).

While on the whole Animal Care Australia can see the direction the recommendations are taking, **and for the most part support that direction**, we feel this would have been an opportunity for the Australian Veterinary Association to have recommended or suggested specific changes to relevant acts, in order to make real change.

**Summary statement:**

Based on the recommendations from the Australian Veterinary Association, and in addition to our first submission, Animal Care Australia’s suggested recommendations would include:

1. Lobby the Federal Government to simplify the issue of Visas to overseas qualified vets and vet nurses.
2. Lobby the Federal Government for assistance with social and essential workers housing for the veterinary industry in return for work provided in certain areas for set periods of time.
3. Amend the Veterinary Practices Act 2003 to enable vet nurses and technicians to perform certain procedures directly.
4. Legislate a schedule of fees and claim process to reimburse vets for treatment of stray and wild animals.
5. Develop an indenture system for vet and vet nurse students whereby education fees are waived for students working in the profession for a set period of time.
6. Outsource vet services performed by RSPCA to private clinics in order to ensure accountability and transparency – currently thwarted by ‘non-disclosure agreements’ required to be signed by all staff working within RSPCA veterinary and shelter areas.
7. Amend relevant legislation to enable private vet clinics to take responsibility and be paid accordingly for welfare, local land services and related matters, including those currently dealt with by the RSPCA and government vets.
8. Introduce legislation regulating wildlife rescue and carers, providing full accountability of monies raised and how those finances are used in the provision of wildlife care including reimbursement of veterinary expenses – at least to cover the costs. Government should also investigate whether the profiteering by non-use of charitably raised funds is in breach of the Charitable Funds Act 1958.
9. NSW Government to establish a fully inclusive working group responsible for the review of the recommendations made by this Committee in order to ensure the viability and sustainability of those recommendations, including potential consequences to the industry by the implementation of those recommendations. The NSW Government is to utilise this working group to guide their response and assist in the implementation of any legislative changes, program initiatives and expansion of services within NSW.
10. Any Working Group must include representatives from all key areas of the industry, including government, veterinary, agriculture and companion animal owners.

For a more detailed outline and specific responses to certain AVA recommendations, please refer to the attached Supplementary Submission.

Animal Care Australia thanks the Committee for this opportunity and we welcome any questions you may have as you continue to finalise the outcomes of this Inquiry.

This submission can be publicly listed.

On behalf of the Animal Care Australia Committee,

Michael Donnelly  
President

# **Inquiry into veterinary workforce shortage in NSW**

## **Supplementary Submission**



**Animal Care Australia supplementary submission**



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## Inquiry into veterinary workforce shortage in NSW – Supplementary Submission



### ACA Background

Animal Care Australia Inc. (ACA) represents the interests of all hobbyist and pet animal keepers nationally. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, fish and exhibited animals. Some individual members also work in the rescue, care, and rehabilitation sectors.

### Supporting statement

Animal Care Australia would like to thank Portfolio Committee 4 for allowing us to appear as a witness at the Inquiry into the veterinary workforce shortage in NSW.

This Supplementary submission is to provide responses to the Questions on Notice, and in addition we provide updated information to support our testimony and the questions posed to us during that testimony.

### Questions On Notice

The Honourable Peter Primrose requested all witnesses review the 16 recommendations outlined with the Australian Veterinary Associations (AVA) submission (No 144)

#### **Australian Veterinary Association recommendations:**

**Recommendation 1:** The NSW Government commit to ongoing recognition and support of veterinarians to continue to build and maintain capacity for Emergency Animal Disease surveillance and response activities.

**Recommendation 2:** The NSW Government consider the pressing concerns experienced by government veterinarians and conduct a comprehensive review and develop a proactive strategy to support the critical work of our government veterinarians, ensure the health of our livestock, and maintain our ability to respond effectively to biosecurity threats and animal welfare issues.

**Recommendation 3:** The NSW Government commit funding to AVA's wellness initiative, THRIVE to support veterinarians and veterinary staff to lead satisfying, prosperous and healthy careers.

**Recommendation 4:** The NSW Government consider funding a public awareness campaign to address the rising rates of verbal and physical assault of veterinary teams and to educate the community on the impact of their actions. For example, similar to the NSW Ambulance 'It's Never Okay' campaign.

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**Recommendation 5:** The NSW Government consider funding for the profession to provide work integrated learning (WIL) opportunities for overseas veterinarians wishing to work in NSW as well as funding to assist international NSW applicants undertake the Australian veterinary examination process without financial hardship.

**Recommendation 6:** The NSW Government support changes to visa provisions including lifting of the age cap for permanent residency to be in line with the human medical field.

**Recommendation 7:** The NSW Government provide resources to fund a think tank to develop an afterhours model that is sustainable for the profession and allows veterinary services to be delivered to the NSW community in both urban and rural areas 24/7.

**Recommendation 8:** The NSW Government Veterinary professionals are extended the same opportunities as other professions that are being encouraged to move to regional, rural, and remote areas.

**Recommendation 9:** The AVA calls upon the NSW Government to explore solutions that support the veterinary sector in its role with stray animals, addressing the key issues outlined and promoting overall animal health, welfare, and public health.

**Recommendation 10:** The NSW Government commits funding to develop and implement a framework that provides regulatory and appropriate financial support to the provision of veterinary services for lost, stray and homeless animals, injured wildlife and during emergency situations provided by all sectors of the profession (charities and the private veterinary sector).

**Recommendation 11:** The NSW Government through funding encourages industry and the veterinary profession to collaborate and develop a framework or solution that will improve integration of veterinary services into animal production systems that is workable for all parties.

**Recommendation 12:** The NSW Government support extending access to the national Translating and Interpreting Service for veterinarians.

**Recommendation 13:** The NSW Government provide funding to resource the development of prioritisation and planning of the longer-term strategies that will have the most effective workforce outcomes for all stakeholders the veterinary profession serves and the profession itself.

**Recommendation 14:** The NSW Government commit to legislative and regulatory reform to safeguard the role of the veterinary profession in the delivery of animal health and welfare, whilst making it adaptable to a constantly changing environment. This could be achieved by a review of the veterinary practice act and consider the interactions with other legislation including the prevention of cruelty to animals act.

**Recommendation 15:** The NSW Government considers funding around educational fee relief to encourage early career veterinarians to work in rural NSW.

**Recommendation 16:** The NSW Government includes veterinarians in existing mechanisms to sustain medical and paramedical workers in rural areas of NSW.

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### Responses to the AVA recommendations:

While on the whole Animal Care Australia can see the direction the recommendations are taking, and for the most part support that direction, we feel this would have been an opportunity for the Australian Veterinary Association to have recommended or suggested specific changes to relevant acts, in order to make real change.

Animal Care Australia notes a number of the recommendations targeted at the NSW Government are in fact recommendations that would require Federal intervention, such as those related to visa, HECS debt etc, or dual collaboration between the NSW Government and Federal Government, such as 'Emergency Animal Disease surveillance and response' which we note has a national Field Guide and Training mechanisms. These clearly would need to work together, in order to ensure collaborative responses and surveillance where issues cross borders.

Animal Care Australia also notes a number of the recommendations are calling for the NSW Government to directly provide funding, while an additional significant proportion would require the NSW Government to indirectly allocate funding (resources, think tanks/reviews, surveys, etc) working towards resolving issues. It is our belief that specifically targeted funding would provide the desired kickstart to resolving some of the issues outlined within the responses/testimony to the Inquiry. For example: Animal Care Australia supports educating the public in order to raise the awareness of the issues being faced by our veterinary industry, as well as the need for a societal shift in behaviour targeted at our veterinary industry, and altering expectations of the public of the outcomes that our vets can provide. This in itself would go a long way to reducing the direct impacts and pressures on the industry as a whole.

Animal Care Australia questions **Recommendation 3** for the NSW Government to commit funding ( a testified amount of \$3million – Transcript Wednesday 30<sup>th</sup> August -page 44) to AVA's wellness initiative, THRIVE. While on the surface this appears to be a fantastic support mechanism, our brief investigation highlights a number of concerns:

- The service is only provided to AVA Members, their professional staff and family members.
  - a. Who is included and who is excluded by stating 'professional staff'?
  - b. Is it a requirement that the AVA is made aware of the individuals accessing this service as that appears to be the case, and this raises concern over confidentiality of the individuals.



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- c. How is it viable for the NSW Government to commit funding to an initiative that is then outsourcing multiple aspects of the program by utilising services<sup>1</sup> already available to everyone – such as Beyond Blue, Lifeline, MensLine Australia, SANE Australia, and more. Therefore, what exactly would be funded?
- How does this assist all non-AVA Members? As testified on page 45, the AVA only represents approximately 50% of the veterinary industry.
  - Wouldn't this \$3million be better suited funding a program accessible by all of the veterinary industry?

**Recommendation 10:** *The NSW Government commits funding to develop and implement a framework that provides regulatory and appropriate financial support to the provision of veterinary services for lost, stray and homeless animals, injured wildlife and during emergency situations provided by all sectors of the profession (charities and the private veterinary sector).*

Animal Care Australia completely supports this recommendation. In relation to the services provided to **lost or stray animals** there are two mechanisms we recognise to assist in financial compensation for vets.

1. Services provided directly to and for Local Councils should be reimbursed by those Local Councils. Animals that have been presented as strays and require scanning or holding until Council come to them and return to the Pound do incur a cost. Holding strays with unknown health or temperament issues is a burden that should not be impacted onto vet clinics because Councils don't have the time or staff to respond quickly.
2. Animal Care Australia agrees with testimony from other witnesses that finances currently received by pet registrations and managed by the Office of Local Government should be better utilised, particularly in this space.

In relation to **native wildlife**, Animal Care Australia reminds the Committee of Mr Donnelly's testimony (Transcript: Tuesday 29<sup>th</sup> August 2023 – page 32): *"... that native wildlife is the responsibility of the Government and, therefore, there should be some sort of cost coverage by the Government. But what I would also suggest is that, at the moment, the public have already funded that. During the 2019-2020 bushfires, there was quite a large raising of money for native wildlife care. There is \$80-plus million dollars sitting in a bank account that's not being made available to the Government and would most certainly be able to be utilised for the use of funding for wildlife care."*

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<sup>1</sup> [Resources being outsourced – page 6](#)

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**Recommendation 12:** Animal Care Australia notes the national Translating and Interpreting Service is currently not accessible as a free service for veterinarians and is a Federal Government initiative, therefore this Committee should make recommendations that veterinarians are able to access this service for free – especially upon review of the eligibility criteria – we are surprised that an essential service such as veterinary care is not included.

### **Summary statement**

Based on the recommendations from the Australian Veterinary Association, and in addition to our first submission, Animal Care Australia's suggested recommendations would include:

1. Lobby the Federal Government to simplify the issue of Visas to overseas qualified vets and vet nurses.
2. Lobby the Federal Government for assistance with social and essential workers housing for the veterinary industry in return for work provided in certain areas for set periods of time.
3. Amend the Veterinary Practices Act 2003 to enable vet nurses and technicians to perform certain procedures directly.
4. Legislate a schedule of fees and claim process to reimburse vets for treatment of stray and wild animals.
5. Develop an indenture system for vet and vet nurse students whereby education fees are waived for students working in the profession for a set period of time.
6. Outsource vet services performed by RSPCA to private clinics in order to ensure accountability and transparency – currently thwarted by 'non-disclosure agreements' required to be signed by all staff working within RSPCA veterinary and shelter areas.
7. Amend relevant legislation to enable private vet clinics to take responsibility and be paid accordingly for welfare, local land services and related matters, including those currently dealt with by the RSPCA and government vets.
8. Introduce legislation regulating wildlife rescue and carers, providing full accountability of monies raised and how those finances are used in the provision of wildlife care including reimbursement of veterinary expenses – at least to cover the costs. Government should also investigate whether the profiteering by non-use of charitably raised funds is in breach of the Charitable Funds Act 1958.
9. NSW Government to establish a fully inclusive working group responsible for the review of the recommendations made by this Committee in order to ensure the viability and sustainability of those recommendations, including potential consequences to the

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industry by the implementation of those recommendations. The NSW Government is to utilise this working group to guide their response and assist in the implementation of any legislative changes, program initiatives and expansion of services within NSW.

10. Any Working Group must include representatives from all key areas of the industry, including government, veterinary, agriculture and companion animal owners.

### Confirming Animal Care Australia's testimony

#### **Thank you to Ms Abigail Boyd.**

Animal Care Australia would like to extend a huge thank you to Ms Boyd for her questions during testimony, as they provide us with the opportunity to outline the structure of Animal Care Australia, our primary objectives, and the ability to expand on our testimony which was limited due to time restrictions.

#### **Is Animal Care Australia a lobbying organisation for pet shops and breeders?**

Animal Care Australia points out there were three separate points within this question.

1. *"My understanding is that Animal Care Australia is effectively a lobbying org for pet shops and breeders."*

Animal Care Australia questions Ms Boyd's misrepresented understanding, given that both Mr Donnelly and Ms Nadazdy met with Ms Boyd on the 31<sup>st</sup> January 2023 and clarified who Animal Care Australia represent, after making the same claim during that meeting.

While Mr Donnelly sought to clarify this statement, with some interruption, Animal Care Australia has provided a full outline of our structure and membership base for the benefit of this Committee, attached in Appendix 1.

2. *"... what is the commercial threat or the threat to profit that comes from having government-run vets or public funding for pet services ..."*

The only possible threat to profits 'may' be within the veterinary industry, in a similar manner to the current financial burdens being voiced by general practitioners in the case of Medicare.

Having said that, Animal Care Australia would also highlight the testimony (and submissions) from veterinary industry professionals have stated they are not making a profit. Therefore, the veterinary industry are in a better position to know whether a similar scheme would affect their ability to not only meet their costs but make an actual profit.

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Pet owners are the ones struggling to meet costs of veterinary care – thus the proposal of a Veticare system or subsidised financial support system.

A review of the Animal Care Australia membership base (Appendix 1) highlights the majority of our members are hobbyists, not-for-profit associations and volunteers providing services that, contrary to the ongoing rhetoric of certain political members<sup>2</sup> (and their Parties), are not profiteering from their animals. The Australian Taxation Office certainly does not classify them to be commercial and continues to refuse to recognise those animal breeders as commercial entities.

Those members that are within an industry include the veterinary, pet agility, pet training and pet boarding industries, where any potential veterinary costs would be incurred by the owners of the pets and not the industries represented. Members who are exhibitors currently bear the costs of all veterinary care.

Public funding for pet services/veterinary care would relieve financial burdens on pet owners and others bearing the costs. Certainly not supporting the alleged claim that a Veticare system would be a threat to their profits, or, why Animal Care Australia is allegedly opposed to Veticare!

3. *“... and why are you so opposed to a Veticare concept?”*

Animal Care Australia draws the Committee’s attention to the last highlighted point in the cover letter that accompanied our submission (No:160):

- ✓ **Veticare Program? While it is well intended, Animal Care Australia cannot currently support or oppose such a proposal.**

Page 13 of our submission outlines the reasons why we currently have not determined an opinion on the Veticare proposal, including: the lack of detail provided in the Victorian proposal and: ***“It would be remiss of Animal Care Australia to support this at this time without having the ability to scrutinise all the inner workings that would be required to make such an initiative functional.”***

Therefore, Animal Care Australia must adamantly disagree with the characterisations implied by this entire line of questioning.

Animal Care Australia also thanks the Chair, for his question (page 32) and confirms his ascertain:

*The CHAIR: To be clear, you say at the end of your submission—this is to Animal Care Australia— that you're not against some sort of assistance for people of low income that own pets to get the treatment the animals need; you're just concerned about the lack of details on a Veticare proposal?”*

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<sup>2</sup> Political statement

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### Point of correction regarding submissions opposed to Veticare:

Animal Care Australia finds this following statement misguided or ill-informed.

*Ms Abigail Boyd: "It sticks out. Out of all of the submissions, I can't think of another one from any vets—from anybody—who is opposed to Veticare. Yet you've got in your submission that there was a resounding no to the idea, so it really sticks out as being quite in contrast..."*

Animal Care Australia reviewed the 209 publicly listed submissions, and we found the following results:

- 10/209 – state written support of Veticare.
- 3/209 – state they do not support Veticare. One categorically opposes it and all ownership of all animals. The other two are from the veterinary industry, one being the Australian Veterinary Association. The other being a vet who categorically opposes it.
- 184/209 – make no mention of Veticare in their submission, including the RSPCA, Veterinary Nurses Council, Cat Protection Society, and the Australasian Veterinary Boards Council. At least 155 of the 184 identified themselves as part of the veterinary industry.

The facts don't appear to support Ms Boyd's position.

Animal Care Australia notes some support for subsidised vaccinations, desexing clinics/programs, financial assistance for wildlife care and some calling for telehealth services – whether these are counted as pro-Veticare is debatable – but if they are, then we remind the Committee that Animal Care Australia called for a telehealth service – Vet-E-Care!

**Suggestion for Animal Care Australia to 'do a more scientific research study given the contacts that you have?'**

While Animal Care Australia is of the opinion that any survey greater than an 'informal survey' should be initiated by the government, as a fully-volunteer run organisation we would require the necessary recompense to conduct a more scientific research study. Perhaps funded by the Government or Greens NSW?

### Animal Care Australia's inclusion of **Animal Rights and Animal Protection concerns within our submission:**

As an animal welfare organisation, it is extremely pertinent to be gathering information about how extremist alternative ideologies impact animal welfare and given the experts that we were

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questioning are veterinary practitioners, then it would have been remiss of us had we not asked that question.

*“... and you go out of your way in this submission to attack those people who would be trying to support the rights of animals. It's important to clarify exactly what your organisation is for.”*

Animal Care Australia is unsure how seeking clarification and opinion as to the impacts animal rights/animal protection ideologies may have is ‘attacking’ anyone.

Should the Committee or the public need to gain a better understanding of ‘what Animal Care Australia is for’, then they only need to look at our Mission Statement and Objectives – both clearly promoted on our website.<sup>3 4</sup>

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### **Animal Care Australia’s Mission Statement**

**“Animal Care Australia (ACA) is the Peak Animal Welfare Body representing keepers and breeders of pet and companion animals in Australia”.**

### **Animal Care Australia’s Objectives**

- ✓ To represent Animal Care Groups as the peak animal welfare body
  - ✓ To engage and advise Government and legislators on welfare issues relating to pets and companion animals.
  - ✓ To protect the rights of ethical hobbyists & animal keepers to breed and keep pets and companion animals.
  - ✓ To clarify the difference between animal rights and animal welfare
  - ✓ To promote higher animal welfare outcomes
- 

Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species.

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<sup>3</sup> [Why ACA?](#)

<sup>4</sup> [ACA Mission Statement & Objectives](#)

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## What is the difference between animal welfare & animal protection & animal rights?



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While producing Animal Care Australia's Animal Welfare Policies & Position Statement documents<sup>5</sup>, we contacted David J Mellor, Prof of Animal Welfare Science, Massey University NZ - Co-creator of the 5 Domains model of Animal Welfare and co-author of the NZ Animal Welfare Act to provide us with the intent and purpose behind the model and to outline the approach taken to move from the 5 freedoms to the 5 domains. It is that approach and guidance from Professor Mellor that assisted Animal Care Australia in developing our policies and forming a greater understanding of animal welfare versus animal rights and the more recently adapted animal protection.

In Australia, the Animal Rights movement will use the term Animal Rights (and more recently Animal Protection) interchangeably with Animal Welfare. This is deliberate, but not correct, and across the world has resulted in a decline in Animal Welfare outcomes where Animal Rights/Animal Protection has been written into law.

For a more detailed breakdown please see Appendix 2 followed by references.

### ***Testimony relating to native wildlife care***

The following is additional information that we would like to bring to the attention of the Committee, having run out of time during testimony.

Animal Care Australia has a number of individual members who are wildlife carers that volunteer for WIRES and other wildlife rescue/caring organisations. It has been brought to our attention (and that of the Committee) that a WIRES program known as Rescue 101 is quite simply taking advantage of the generosity of the veterinary industry creating a greater burden and financial loss to the industry. Vets are providing any medical care at no cost to WIRES, as well as animal-sitting services.

Rescue 101 volunteers (who are not fully qualified wildlife carers) are tasked to go out and pick up animals, reported to be either injured or in locations they shouldn't be. The volunteer has extremely limited knowledge of the animals (they receive only 4 hours online training) and within that must deliver the animal to the nearest vet. The animal is then left with the vet for examination. In most cases the animal is either required to go into care OR, as is more often the case, no care is required and it needs to be returned to where it was found. The burden for ensuring that occurs is now on the vet. The Rescue 101 volunteer has left. The vet must then contact a WIRES Wildlife Carer that has the training and expertise of that species to come and collect it. Pending the species and availability of carers, this could take up to 48 hours. Note: Rescue 101 volunteers are not permitted to have contact with carers and vice versa.

The vets are treated as a free baby-sitting service with the expectation of any medical costs being absorbed by them.

The Rescue 101 volunteer is nothing more than an animal uber service with a one-way only ticket.

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<sup>5</sup> [Animal Care Australia Policies](#)



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The WIRES Carer is then expected to bear the costs of the transport to collect the animal from the vet and return it to its habitat location or back to the home of the carer, as well as medication, and ongoing care for all wildlife with no reimbursement by WIRES.

WIRES meanwhile is sitting on \$80 million earning interest and in their own testimony are still trying to work out how to use that money – three and half years later?

Meanwhile vets are treating wildlife for free and WIRES's carers provide care at their own expense?

There is something really wrong with that picture and MUST be changed.

Animal Care Australia thanks the Committee for this opportunity and we welcome any questions you may have as you continue to finalise the outcomes of this Inquiry.

This submission can be publicly listed.

On behalf of the Animal Care Australia Committee,

A handwritten signature in black ink that reads 'M Donnelly'.

Michael Donnelly  
President  
Animal Care Australia

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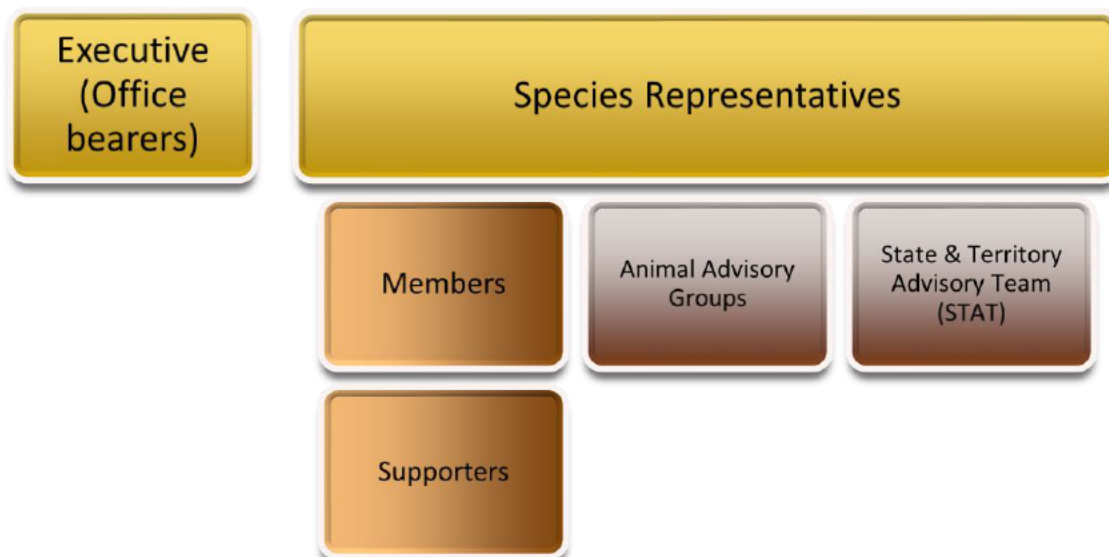
### Appendix I: Animal Care Australia structure.

Animal Care Australia is governed by a committee comprised of the Executive and Representatives from all pet & companion animal species.

The Animal Care Australia constitution provides for two categories of financial membership:

**Members** – who are animal keeping associations. These associations have voting rights and appoint relevant Species Representatives. They are predominantly hobbyist-based associations. Animal Care Australia recognises some of these organisations do have members who are breeders, but those individuals do not have influence over the Animal Care Australia Committee as the associations appoint representatives to participate in an Animal Advisory Group.

**Supporters** – who can be individuals or other animal-specific organisations and these have no voting rights.



**Animal Advisory Groups** are comprised of the Species Representative, at least one other ACA Committee member, and our members' representatives. Upon approval of membership members are invited to participate in an Animal Advisory Group, providing our members with a voice.

The **State & Territory Advisory Team** is comprised of the Assistant to the President, at least one other ACA Committee member, and volunteer representatives from within each State or Territory.

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Their task is to monitor and advise the Animal Care Australia Committee of animal-based reviews, proposed legislative changes, and other animal welfare concerns that would require Animal Care Australia's attention.

### ***Animal Care Australia Membership breakdown:***



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### Appendix 2: Animal Welfare versus Animal Rights or Animal Protection:

	Animal Welfare	Animal Rights	Animal Protection
Has a scientific definition	Yes	No	No
Has a legal definition	Yes	Varies in different jurisdictions	No
Centred on science and research	Yes	No	No
Centred on philosophy and ethics	No	Yes	Yes
Deal with an Animal's own Experience of life	Yes	No	No
Deals with how humans may interact with animals	Yes	Yes	Yes
Condemns human use of animals	No	Yes	Yes
Focus on animal wellbeing	Yes	No	No
Has measurable and objective standards	Yes	No	No
Is peer reviewed and transparent	Yes	No	No
Supports the care of animals in captivity and domestication	Yes	No	No
Championed by extremists	No	Yes	Yes
Has a place in legislation	Yes	No	No
Attempts to by-pass peer review by making changes in legislation	No	Yes	Yes
Changes in response to Social Licence to Operate	Yes	No	No

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***References for Animal Welfare versus Animal Rights information:***

Stooksbury, Kara E.; Scheb II, John M.; Stephens Jr., Otis H. (2019). "Animal Rights". Encyclopedia of American Civil Rights and Liberties: Revised and Expanded Edition. Vol. 1 (2nd ed.)

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Marisa Erasmus, (2020) Animal welfare and animal rights: Ethics, science and explanations. Purdue University

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<https://www.animallaw.info/article/animal-rights-theory-and-utilitarianism-relative-normative-guidance>

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