

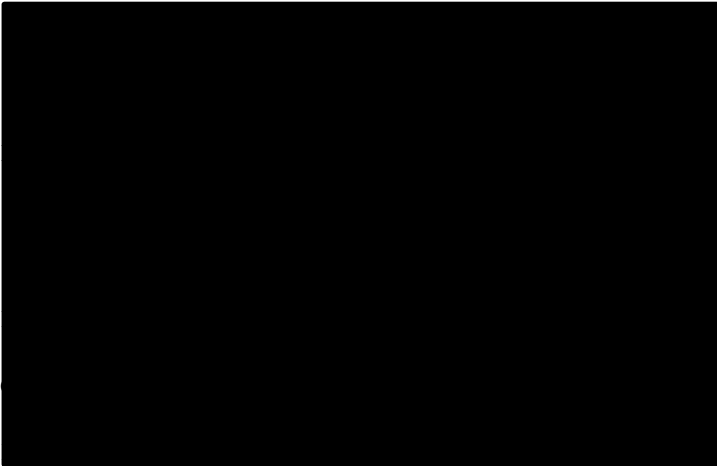
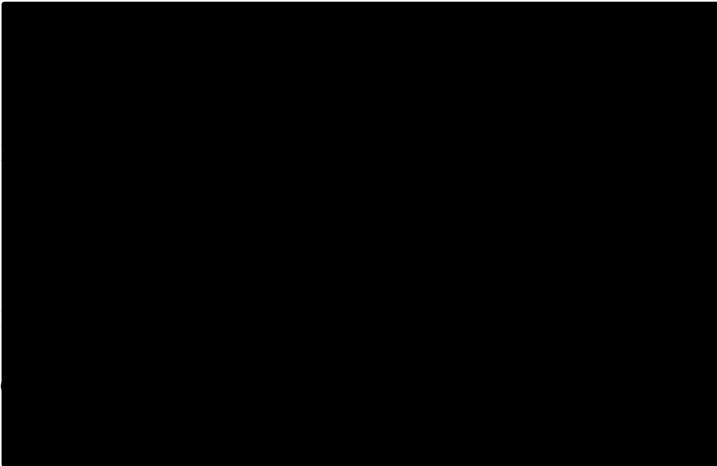
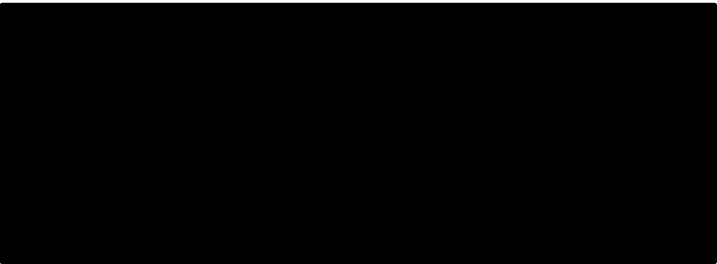
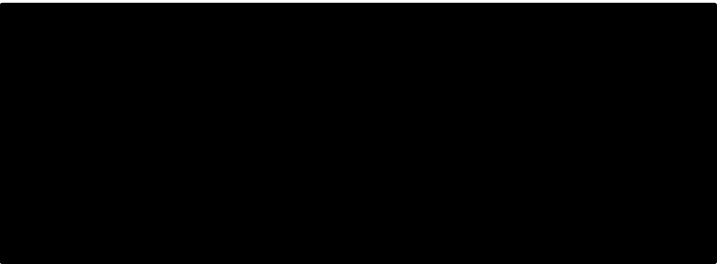
Animal Welfare Consultation
4C, Department of Agriculture, Food and the Marine
Kildare Street
Dublin 2

31st October 2018

Re: Submission in relation to A New Animal Welfare Strategy - Consultation Document presented at the Animal Welfare Conference 13th September 2018

Dear Minister Creed

We are writing in relation to the above Consultation Document. This submission is made on behalf of the following animal rescues and animal welfare and training organisations:

Name	Contact	Email
A Dog's Life		
AniEd		
Cara Rescue Dogs		
Celtic Animal Life Line		
Cottage Rescue		
Dogs Aid		
Dogs In Distress		
Dog Rescue Coolronan		
Dundalk Dog Rescue		
Dungarvan Rescue Kennels		
Husky Rescue Ireland		
Ireland's Animal Welfare Alliance (IAWA)		
Ireland's Cruelty to Animals Exposed (ICE)		
Irish Cavalier Rescue		
Leinster Horse & Pony Rescue		
Limerick Animal Welfare		
PAWS Animal Rescue Ireland		
Rehoming Pets Cork		
Royal Dog Rescue		
South East Animal Rescue		
Tipp Off Animal Rescue		
Waterford Animal Welfare		
West Cork Animal Welfare Group		

Included in the listing above are IAWA and ICE who have been set up to work in conjunction with one another to highlight animal welfare news and ideas and also to catalogue cruelty cases around Ireland which are shared on our Facebook pages. Both groups involve staff and volunteers from the rescue world in Ireland. Also listed is AniEd, an education and training company who provide courses in the area of animal care, training and behaviour.

We would like to start by stating we wholeheartedly welcome a new Animal Welfare Strategy and we are pleased to be included in the process. Our submission is based on vast experience and knowledge from dealing directly with animal welfare situations in Ireland on a daily basis.

Our submission starts with some of our thoughts which we note in order of the content laid out in the Consultation Document, we will then give our contributions and reactions to the points/questions you have laid out under Point 8. (Conclusion), followed by a summary of our points and very importantly our submission will end with additional points which we ask the Department to take into serious consideration.

2. Why an Animal Welfare Strategy Now?

“...it is considered timely to bring forward a strategy on Animal Welfare that projects forward over the next decade. Up to now approaches to the subject have tended to be ad hoc and issue led rather than following a strategic vision.”

We welcome a Strategic Vision and acknowledge the forward planning of the DAFM for the decade ahead. In support of the Strategic Vision we would like to see a 10 Year Plan with quantifiable objectives. We acknowledge the 13 Strategic Actions which you have listed under Point 7. (Strategic Actions), however, we believe a set of Actions which are more accountable would also be beneficial and would assist all stakeholders to realize the Strategic Vision. We will further address this later in our submission.

5. Vision and Strategic Outcomes

“It is proposed that the Vision is that Ireland becomes increasingly recognised as a country that promotes and assures the welfare of all animals”

We will address the proposed vision later in our submission.

We will drive toward this Vision by working on a number of specific strategic outcomes:

- a) Supporting Excellence Standards – While simultaneously ensuring minimum acceptable standards are enforced Ireland will support initiatives whereby many animals are housed and cared for in even better ways.*

While we are not clear on the ‘Excellence Standards’ referred to above (have they already been agreed and are there any of these initiatives already in place?) we would feel very strongly that

excellence standards should not be mere guidelines but should in fact be enforced. ‘Ensuring minimum acceptable standards are enforced’ is a really demotivating statement – it is the bare minimum and we believe this is what needs to be looked at. We need to raise the bar. Ireland has paved the way with so many important issues in recent years and we are now looked at as a country which can lead the way when it comes to humanity issues and we should be no different when it comes to animals. We should aim to be leaders in the field of animal welfare. Not enforcers of minimum standards but leaders in standards of excellence.

In your Consultation Document you outline the reflections of the OIE’s approach to animal welfare, one of which is *‘That the use of animals carries with it an ethical responsibility to ensure the welfare of such animals to the greatest extent practicable’*. Based on that statement we suggest that we have an ethical responsibility to raise our ‘minimum acceptable standards’ as we believe this can be done while still remaining practicable. We need to promote our minimum acceptable standards to standards of excellence – this should not be a choice. We appreciate this would require amendments to the Animal Welfare Act 2013.

b) Ireland will be fully engaged at the centre of the international dialogue about best practice in animal welfare.

We would like to be kept aware of the international dialogue. We note that Ireland has not yet ratified the European Convention for the Protection of Pet Animals and would like to see this issue addressed as part of any Animal Welfare Strategy. We would also like to see Ireland included on the World Animal Protection Index. Inclusion on this Index would go some way towards showing Ireland is taking animal welfare seriously and is willing to engage in international dialogue about best practice.

c) It becomes the norm that everyone dealing with animals is trained or educated to an appropriate level.

We would very much welcome this strategic outcome. We would be interested in understanding how DAFM intend to roll this out, to who they intend to roll it out to and the type of training. We would be very keen to consult with DAFM on this matter – to offer our thoughts and our ideas on creating a full QQI Level 5 Award. Currently the only Award available is a Level 4, which does not go far enough to address the issues nor does it give the learner a full understanding of the issues surrounding Animal Welfare. Whilst there are good Equestrian Awards available at Level 5 there is none for companion animals. For example, today we have many Local Authority staff working with dogs who are not sufficiently trained and we refer to the positive approach which this document recognises (a scientific approach; the behaviour and mental state of animals) and feel very strongly that, for example, people working closely with dogs, who are not in their normal environment and who are experiencing fear and distress, possibly pain, injury and disease, should be properly trained by qualified dog behaviourists/positive force free dog trainers.

d) Ireland becomes better recognised for its high level of animal welfare standards

Of course we would welcome this and would hope that not only are we recognised as having high levels but as leaders in introducing positive changes. A ranking on the World Animal Protection Index would go some way towards achieving this recognition.

e) *Improved animal welfare outcomes will ultimately benefit the economics of farming*

We agree with this statement

6. Overarching Strategic Principles

A. Roles and Responsibilities

“...Other Actors- including those involved in the trade of animals, in the transport of animals....., in the slaughter and killing of animals, in the rescue and sheltering of animals, as well as those involved in policy development across these sectors – all have a responsibility to ensure that they meet moral, ethical and particular specific legislative obligations regarding the welfare of animals in the context within which they operate.

Whilst we wholly agree with this statement we believe that there are many individuals/organisations in Ireland who would either claim to be unaware of these obligations or who chose to ignore them. We would urge the DAFM to look at ways that the moral, ethical and legislative obligations can be shared and promoted widely so that ignorance cannot be used as an excuse if a situation should arise.

B. Working in Partnership/Coordination amongst Stakeholders

“Working in partnership requires a mechanism where the views and contribution of all relevant stakeholders are shared and taken into consideration in the development of policies, in the evolution and development of standards, guidelines and codes of practice and in the formation of legislation. Working partnership also requires clarity and acknowledgement of the roles of respective stakeholders and acceptance by all of the responsibilities associated with such roles. The Farmed Animal Welfare Advisory Committee (FAWAC), the IPAAG (Irish Pet Advertising Advisory Group) and the Greyhound Forum all play an important role in bringing stakeholders together”

As above, this submission is made on behalf of a number of animal rescues and organisations. There are many more rescues around Ireland who are dealing with the saturation of horses, cats and dogs in particular, including rescues centres and foster based organisations, paid workers and volunteers. The amount of work carried out day in day out, year in year out by all of these rescues and organisations is phenomenal and so our experience is taken from ‘the coalface’ of Irish rescue. Independent rescues need to be recognised and included as (proportionate) stakeholders when it comes to developing standards, guidelines and codes of practice and in the formation of legislation. We propose that members of Ireland’s Animal Welfare Alliance (IAWA) could be the rescue representatives.

C. Focus on Scientific and Evidence based Animal Welfare Research

“...The existing national framework to assess such matters is the Scientific Advisory Committee on Animal Health and Animal Welfare, supported by experts with in the DAFM, academia and state agencies...”

Does this committee advise on farmed animals only or on companion animals also? We believe it is necessary to have a panel such as this to advise on companion animals and we would expect to see one or more independent, qualified dog/animal behaviourists.

As your document acknowledges, animal welfare means different things to different people so a diversity of opinion on the committee is required. Absolutely, scientific and evidence based research is vitally important, but equally so are moral and philosophical academia. It cannot be 100% science based – we need discussion around what we believe is acceptable in terms of animal industries and then look to see what scientific evidence there is to back up our beliefs.

D. Improved Measurement of Strategic Implementation

“Measurement is important to ensure that we can establish a basis for demonstrating effective progress toward our strategic outcomes”.

We agree that this is very important.

“Measurement is also important because welfare is a multi faceted issue over which there is not always agreement... Measurements of animal welfare should be as holistic as possible, taking into account the various prisms of physical, mental and the ‘living environment’. This however is not easy, given the varying degrees of measuring each... Behavioural assessment can be difficult to standardise as the subjectivity of the individual assessor and the repeatability of the assessment needs to be taken into account”.

This is certainly an issue which requires some form of consistency and again we would be very willing to consult on this and forward our ideas and input. One suggestion we would have is that investigations should not be undertaken by veterinary practitioners and/or local authority staff from the same county as a premises being investigated or checked.

E. Enhanced, sensitive fair and robust enforcement

The Early Warning System (EWS) established by DAFM on foot of a recommendation from the Farmed Animal Advisory Council plays an important role in dealing with these sensitive situations. It involves a nationwide collaborative approach involving farming associations, DAFM personnel, the Irish Society for the Prevention of Cruelty to Animals and the HSE. The EWS arranges for relevant agencies and bodies or individuals known to the farmer to undertake timely interventions in advance of welfare problems becoming acute.

This sounds like a very sensible and reasonable approach as all cases are not straightforward cruelty cases and as outlined in your document sometimes the wellbeing of the owners needs to be addressed in conjunction with the welfare of the animals. However, we note that this Early Warning System is only in place for farmed animals and we would strongly urge that a similar system is designed and put in place for companion animals and other species. Rescues are very often made aware of situations such as domestic hoarding or ‘rescues’ being set up and run well below the standards which are held by good rescues around the country.

We would welcome a simple but dedicated process whereby we can alert the appropriate authorities of situations which appear to be out of control or heading in that direction. We would ask that we have a dedicated person in the DAFM to contact regarding cases such as these.

7. Strategic Actions – towards of achieving our Strategic Outcome

1. *“We will work on the development of new and updated Codes of Practice for various sectors which will play a key role in developing and codifying agreed welfare standards for the various sectors”.*

We would like to know what the various sectors are and if there will be a Code of Practice for rescues and we would like to be consulted in the Codes of Practice for non farmed animals.

7. *We will continue to develop a framework of close collaboration with the various stakeholder groups.*

As previously stated we would welcome inclusion of representation of independent rescue groups and organisations on this framework.

9. *“A Welfare Advisory Council in respect of non farmed animals will be established”.*

We welcome this Council and believe that there should be independent rescue representation. The Irish Animal Welfare Alliance (IAWA) is happy to put forward a member for this Council.

10. *Quality Assurance Schemes will be adapted to improve their ability to meet societal concern on animal welfare.*

We welcome this and look forward to seeing the adaptations – as you have pointed out on page one of your document, welfare of animals is an important and growing global societal concern and these concerns will continue to evolve.

11. *Examine the Early Warning System so as to review and establish best practice and to assemble and compare results and experience from different regions.*

As above, we would push for an EWS to be introduced for rescues to alert the DAFM of situations which may need intervention. The DAFM can then assign it to the appropriate organisation for further investigation.

13. *A regular reporting framework will be established setting out the major developments in the area of animal welfare.*

If the reporting framework involves stakeholders we would ask for rescue representation; if it is a Department framework we would ask to be included on the distribution list of reports/feedback/developments.

Now we reach the conclusion of the Consultation Document which we feel is a positive and welcomed document. As you have requested, we will now give our contributions and reactions to the following points/questions which you have laid out.

8. Conclusion

Have we reflected the most relevant perspectives in respect of animal welfare research and theory in Section 4?

You have discussed The Five Freedoms, The Five Domains concept, The Quality of Life approach (or 'A Life Worth Living' perspective) and the One Welfare concept. It is a little unclear which of these the Animal Welfare Strategy will follow or if it will follow a combination of these concepts. We believe in the Five Freedoms and by extension the Five Domains concept which delves deeper and wider. We would welcome elements of the Quality of Life and One Welfare concepts as long as they do not compromise or dilute The Five Domains concept. However, we would welcome further input into this and the wording to be used.

Does the vision for animal welfare show the correct level of ambition?

The vision is "Ireland becomes increasingly recognised as a country that promotes and assures the welfare of all animals". Unfortunately, we feel this does not hit the correct level of ambition and we would ask for further consideration to be given to a much more powerful vision such as 'Ireland becomes recognised worldwide as a country leading the promotion and assurance of excellence standards in animal welfare'.

Should there be greater focus on the role of other and non state organisations and institutions?

Yes, as outlined throughout our comments above, focus needs to be given to the independent rescues who are working tirelessly the length and breadth of the country every day and who substantially relieve the burden which would otherwise rest on the state. In 2004 68% of dogs that entered the pound system were destroyed. By 2017 that number had reduced to 8%. In 2017 5,824 dogs were transferred from pounds to rescues, the majority of those dogs going to independent rescues. The number of dogs entering the pound system has also dropped dramatically as many rescues are now accepting surrenders which avoids the dogs having to enter the pound system in the first place. There is correlation between these figures and percentages.

Are the Strategic Principles correct?

We have outlined our thoughts on this previously in the document. In brief:

Roles and Responsibilities: We would urge the DAFM to look at ways that the moral, ethical and legislative obligations can be shared and promoted widely so that ignorance cannot be used as an excuse if a situation should arise.

Working in Partnership/Coordination amongst stakeholders: Independent rescues need to be recognised and included as (proportionate) stakeholders when it comes to developing standards, guidelines and codes of practice and in the formation of legislation. We need to be included in the ‘mechanism’.

Focus on Scientific and Evidence based Animal Welfare Research: We believe it is necessary to have a panel such as the Scientific Advisory Committee to advise on companion animals and we would expect to see one or more independent, qualified and certified dog/animal behaviourists on the panel.

Improved Measurement of Strategic Implementation: Measurement of animal welfare (in practice) is certainly an issue which requires some consistency and again we would be very willing to consult on this and forward our ideas and input.

Enhanced, sensitive fair and robust enforcement: We would welcome a simple but dedicated EWS process whereby rescue organisations can alert the DAFM of situations which appear to be out of control or heading in that direction.

Is the balancing approach on enforcement appropriate and correct?

Does this question refer to the balance between ‘robust enforcement’ whereby cases are brought forward for prosecution and the situations where a Notice has been issued? We of course agree that there has to be a balance – each case is different and sometimes, as your document points out, there are cases where the owner’s own health has had an impact on the welfare of animals in his/her care.

However, we cannot comment as to whether the ratio is fair or not as we are only aware of the 50 successful prosecutions since 2014 which you stated in the document; we are not aware of the number of notices issued or the follow up or outcome of these notices.

We are also aware that there may be cases investigated where notices were not issued and so we believe that not only does the above balance need to be considered but also the criteria/consistency needed around whether or not notices are issued.

What areas of research should be considered for animal welfare?

We believe that we should be researching what other countries have introduced which has had a positive impact on animal welfare, we should be researching the best ways to share information not only to farmers and those working in animal food production and animal care but also to the millions of owners of domestic pets in Ireland and we should be promoting modern, science based animal behaviour understanding and training. We need those working with animals and those living with animals to realize that we now have a science based and science backed understanding of animal behaviour and the effects that different environs and factors can have on their mental and physical health.

Summary of the Consultation Document

In summary of the above, we praise you for this document and for offering it for consultation.

We would like to see a 10 Year Plan detailing the quantifiable objectives as well as the Strategic Actions.

We ask that going forward there is representation from independent rescues and animal welfare organisations included in any further consultations regarding this Strategy and in committees regarding animal welfare.

We would urge that ‘minimum acceptable standards’ are a thing of the past and that ‘standards in excellence’ are introduced as the new standard and that Ireland leads the way in this.

We welcome your proposal that it become the norm that everyone working with animals is trained to an acceptable standard and we would be happy to give further input and thoughts on this.

We would like to see an Early Warning System for those in rescue who might identify such situations, allowing them to raise their concerns through a dedicated process with DAFM before the situation becomes acute for owner and/or animals.

We would urge the DAFM to look at ways that the moral, ethical and legislative obligations can be shared and promoted widely across the country so that all animal owners/carers are aware of their obligations.

We ask the DAFM to seriously consider inclusion on the World Animal Protection Index.

If you refer to the ICE Facebook page <https://www.facebook.com/Irelands-Cruelty-to-animals-Exposed-ICE-335926716882478/> or <https://iawa.ie/category/cruelty/> you will see some of the cases which have come through Irish rescues this year. You will also note that in many cases the posts highlight that most of the straying dogs and equines are not chipped making it extremely difficult for any owner to be identified or any action to be taken. The legislation in place is not working simply because it is not being enforced and rescues are being left to deal with the increasing number of dogs and horses which come into care.

Puppy farming in this country contributes hugely to the saturation of ‘unwanted’ dogs and although we will always have sighthounds occupying our pounds and rescues, we have seen ‘the latest fad’ breeds such as huskies dominating in recent years and we are now starting to see the latest cross breeds such as ‘Cavachons’ and ‘Labradoodles’ fill this ‘latest fad’ ‘space’ in rescue – a space which does not exist.

We recently made a submission regarding the sale of animals in petshops and online – another huge problem for rescues. We also work alongside Irish horse rescues who in the last number of years have been unable to deal with the horrific but escalating growth in abandoned equines and we note that in 2017 1603 horses were seized by the authorities and 1198 of those (75%) were euthanised. It is a very sad and unacceptable level that we have fallen to.

Our point here is that while new legislation and strategies are welcomed, they are only of use if they are enforced. There was huge publicity around the introduction of microchipping laws for dogs and indeed many people went to their vets and got their dogs chipped – these are likely to be the same people whose dogs are kept in good health and under control. It is by and large the owners who allow their dogs to stray and whose dogs are very often uncared for who have ignored this law and as it is not being enforced there is no motivation for these irresponsible dog owners to take action. Hence, you will understand that while we will always give our input to submissions such as this we will always highlight that enforcement is as important as the legislation/strategy. **Legislation is nothing without enforcement.**

Additional Critical Points

Working together on this document, a number of rescues have put together the following points which we firmly believe need to be given serious consideration and time by the DAFM. There are laws in place and laws not in place making life difficult for Irish rescues and some simple changes could have a very positive outcome for those working in rescue and for the animals in their care.

We ask that you give the following points your utmost attention and consideration. They are not listed in order of importance.

At present only pounds can clear a dog for rehoming after holding them for five days on their premises. That means that by law, a rescue who takes in a stray dog has to either surrender it to the pound (often with no guarantee that the rescue can reclaim the dog at the end of the five days if it has not been reclaimed by its owner) or hold it for 366 days before they can legally rehome the dog. Clearly rescues cannot hold dogs for 366 days and even if it was an option there could be legal implications in microchipping a dog that is not legally theirs until the 366 days have passed.

There are a few pounds who have agreements in place with rescues, that the rescue can hold the dog for the five days and rehome after five days, once they have notified the pound of the dog prior to the five days commencing. This works very well and we are unaware of any issues with this arrangement.

We would like to see it taken one step further – that rescues approved by the DAFM can hold a stray dog for five days and rehome it afterwards, once they notify their county pound (or the pound within the county where the dog was found), confirm that there is no chip present and forward a photo of the dog.

There have been cases where dogs who are microchipped have been rehomed by pounds (not to the owners) – this needs addressing. All pounds, whether run by the SPCA, a Local Authority or a private firm need to have a procedure in place around scanning dogs that come into their care and recording confirmation of the scan. All dogs should be scanned twice as a precaution. We ask that the DAFM communicate to all pounds that they must scan and they must put in place an approved written procedure around same.

We are also aware that not all pounds in Ireland microchip the dogs before they leave the pound. This is totally unacceptable! The pounds should be leading by example whereas in fact some pounds are not complying with legislation.

The above points introduce the fact that there is no consistency between pounds in Ireland.

Some pounds microchip, some don't. Some pounds vaccinate, some don't (and vaccines vary between pounds). Some pounds request a Dog Licence, some don't. And some pounds welcome and work willingly with rescues, whereas some don't. Also, the standards between pounds completely varies when it comes to the conditions in which the dogs are kept and the attention and care they receive. We would like to see set Operating Procedures and Operating Standards put in place across all pounds and monitored. It is not acceptable that a stray dog in one county will receive better care and have a much better chance of making it out of the pound than an unfortunate dog found in another county.

We would like Ireland to follow the UK's recent ruling on third party sales. Ireland has a serious issue with puppy farms and one way of addressing this is by banning third party sales. Breeders need to be held accountable for the dogs they are breeding. This is a huge point and needs far more than a bullet point in this submission. In our last submission we recommended a ban on the selling of animals on line and third party sales and we look forward to the feedback from DAFM on that submission.

Your document states that the DAFM was assigned sole responsibility within government for policy matters relating to animal welfare. However, the matter of animal welfare is spread across three departments, which makes it very difficult in terms of continuity. This was recently recognised by Sean Kyne TD. We strongly believe that the responsibility of animal welfare should be housed under one roof – not spread under three.

As we have referred to above, there is a complete lack of enforcement around the microchipping of dogs. We recently asked a number of rescues and pounds what percentage of dogs coming in to them were chipped and the answer was shocking – less than 5%! Microchipping enforcement needs to be looked at urgently as it appears that only the 'good' owners are chipping their dogs whereas those who leave their dogs to stray are not and therefore there is zero accountability. If the DAFM were to ask a Vet for the percentage of chipped dogs coming into their practice they would find that they would receive a very different answer than if they were to put the same question to rescues and pounds around the country.

As stated in The Animal Health and Welfare Act 2013, Gardai are Authorised Officers and as such have powers to investigate and to seize an animal. However, we often hear of cases where the Gardai are contacted in suspected cruelty cases and they say they do not have the powers and it must be referred to the ISPCA. We believe that many Gardai perhaps do not realize that in fact they have an authorised role and duty in animal welfare. This is something that needs to be reinforced to Gardai so that they are aware that in fact they can, and should, take action when required.

We also believe that there should be mandatory training for Gardai on animal welfare legislation, particularly on the Animal Health and Welfare Act 2013, the Control of Horses Act and the Control of Dogs Act.

Each Garda station should be equipped with a microchip scanner – it is an inexpensive piece of equipment which can be used in the station or can be used ‘on the beat’ – we believe ‘spot checks’ are one way of enforcing microchipping.

Animal Welfare is a right – it is written into our legislation. This needs to be recognised by farmers, breeders and by every individual owning an animal. It is not a luxury or an option – it is a right and it is against the law not to comply with our legislation. We would welcome government campaigns via social media, radio, television and outdoor advertising covering important aspects of animal welfare to inform the public that it is a right and that all animal owners and carers should be aware of their legal duty to animals in their care.

There is a huge issue of animal welfare when it comes to animal fairs in Ireland – Ballinasloe being a recent example and the biggest. There needs to be a serious shake up of these fairs. Whilst we appreciate that there are sections in these fairs which are run well and the animals are in good health, kept in good conditions and with the correct paperwork, there are clearly areas in these fairs where animals are not kept in good conditions – dogs crammed into cages together, live fowl being stuffed into plastic bags at point of sale, ponies tethered together for long periods and causing injury to each other – and how many of these dogs are chipped? How many of these equines are chipped and passported? At the point of sale is the correct procedure followed and the buyer produces two forms of identification, etc? It is fair to say that it is highly unlikely that this is happening and that needs to be addressed urgently.

It is not acceptable that in 2018 we are faced by images of horrendous cruelty in these fairs and those images are shared across Europe and the rest of the world. This year, the fair sponsors were targeted on social media and there was public outcry over videos which circulated of animal cruelty. It is shameful and the public feeling against Ballinasloe (and other fairs of the same ilk) is growing and will continue to gain momentum.

We believe that puppy farm dogs should be classed as companion animals, not farm animals. They are bred to be sold as companion animals.

At present it is only Authorised Officers who have access to the equine microchip database therefore making it a lengthier process for rescues to identify owners of stray chipped horses. Animal rescue is 24/7 but unfortunately the Authorised Officers are not contactable at all times, often not at weekends. A suggestion would be that access is given to a member of those equine rescues who receive funding and the nominated person agrees to sign a confidentiality agreement.

As in our last point, the availability of Authorised Officers (or lack of) is an issue, not only for rescues but we would assume for those Authorised Officers themselves. In order to alleviate the situation we would propose that the DAFM work with rescues to identify and train a number of rescue workers/volunteers as Authorised Officers (nationwide).

We believe it is vitally important to educate children about animal welfare – it can be incorporated into the curriculum in many ways and again we would be willing to share our ideas on this. We recommend that the DAFM take a look at the New Zealand organisation, SAFE who have written textbooks to be used in schools. <https://safe.org.nz/animals-us>

The Additional Points listed above are in brief and given the opportunity we would discuss all or any of these points further. They are critical to our submission and we have only outlined them in brief but they are of the utmost importance and are raised over and over in the world of rescue.

We thank you again for inviting our input and we are available for further consultation.

Yours sincerely

Andrea Driver

(on behalf of the abovementioned rescues and animal welfare and training organisations)