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To: [LA Committees](#); [Legislative Scrutiny Committee](#)
Cc: [REDACTED]
Subject: Submission on Bill - Animal Protection and Related Legislation Amendment Bill (Serial 32)
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Attention - Legislation Scrutiny Committee

Dear Committee Members,

1. Introduction

- The Crocodile Farmers Association of the NT (CFANT) represents members actively involved in the management, farming, and welfare of crocodiles across the Northern Territory. Our industry has a long history of implementing safe, humane, and evidence-based animal husbandry practices, developed in consultation with scientific experts, regulators, and cultural stakeholders.
- We are committed to supporting legislation that enhances animal welfare while ensuring practical, workable provisions for those responsible for the daily care, handling, and management of crocodiles.
- We make this submission in response to the call for submissions on the Bill Animal Protection and Related Legislation Amendment Bill (Serial 32) ("the Bill"), noting that certain provisions—while well-intentioned—create risks of misinterpretation, unintended operational impacts, and potential conflict with current best-practice animal welfare standards.

2. Summary of Key Recommendations made on behalf of CFANT

1. **Clarify Section 21 and amendment of Regulation 5 (Cruelty – Electrical device)** so that recognized humane electrode positioning for crocodiles (across the cranial plate) is explicitly permitted and not confused with the proposed prohibited "against the face" provision.
2. **Ensure crocodile-specific practices are reviewed** in light of the most recent codes of practice before any legislative changes are finalized, particularly in relation to electrical devices used for restraint and stock management.
3. **Extend consultation and cultural engagement** to allow sufficient time for industry, scientific, and Aboriginal traditional hunting perspectives to be incorporated into the legislative framework.

3. Detailed Comments

3.1 Clarification of "Against the Face" in section 21 (with reference to Regulation 5(a))

- **Issue:**
The proposed amendment to Regulation 5 currently prohibits use of an electro-immobilizer "against the face" of a crocodile. While this intent appears aimed at preventing inhumane practices, the term "against the face" when referenced in respect of crocodiles is ambiguous and could unintentionally prohibit positioning of

electrodes in a manner that is recognized as humane and effective.

- **Evidence and Reasoning:**

Peer-reviewed research (Small, A., Niemeyer, D., Hewitt, L. 2023. *Evaluation of a commercial electrical stunning method for farmed grower saltwater crocodiles (Crocodylus porosus) using non-invasive EEG measurements*, *Animal Welfare* 32, e49) identifies positioning the electrodes across the cranial plate, above the brain (Position 1), as optimal for effective and humane restraint. Please see link –

<https://www.cambridge.org/core/journals/animal-welfare/article/evaluation-of-a-commercial-electrical-stunning-method-for-farmed-grower-saltwater-crocodiles-crocodylus-porosus-using-noninvasive-eeeg-measurements/42A868AE71B43EF064D51AD94509EEAD>

- To a lay reader, this positioning could appear “against the face,” despite being the scientifically preferred method for ensuring animal welfare and operator safety.

- **Recommendation:**

Amend the proposed amendment to Regulation 5 to remove the ambiguity and explicitly permit “positioning of electrodes across the cranial plate, above the brain, when used for humane restraint or stunning of crocodiles in accordance with recognised animal husbandry practices,” supported by relevant diagrams and current scientific literature.

3.2 Consideration of Electrical Devices in Crocodile Stock Management

- **Issue:**

Clause 27 repeals and replaces Schedule 2 and permits the use of electrical stunning devices for certain livestock for driving, herding, mustering, or controlling those animals. There is reference to crocodiles within Item 1 of the proposed Schedule 2.

- **Evidence and Reasoning:**

Whilst it is noted that Item 6 refers specifically to the use of “Electro-stunner” for crocodiles, CFANT is concerned there may be confusion caused by keeping a reference to crocodiles within Item 1. This is on the basis that crocodile handling practices differ fundamentally from terrestrial livestock management. In crocodile operations, electrical stunning is not used for “stock prodding” but as a precise, controlled method for restraint—minimising stress, risk of injury to the animal, and danger to handlers.

This was the basis upon which CFANT previously sought specific reference to the use of stunning for the purpose of restraining crocodiles and anticipates this may be the basis for the wording of Item 6.

- **Recommendation:**

Amend the legislation to remove reference to “crocodile” under Item 1 given the recognition and permission set out under Item 6 of the use of electrical devices for crocodile handling in accordance with evidence-based welfare standards. This ensures legislative alignment with practical, humane management methods currently endorsed by experts.

3.3 Concerns regarding Consultation Process and Cultural Considerations

- **Issue:**

CFANT is extremely concerned that the timeframe for submissions appears insufficient for thorough cross-industry and cultural review of complex animal welfare provisions. Additionally, it is unclear whether Aboriginal traditional hunting and fishing practices have been formally considered.

- **Evidence and Reasoning:**

The development of the crocodile code of practice involved extensive, multi-stakeholder consultation to ensure legislative and practical alignment. A similar approach is needed here to prevent unintended impacts—particularly in the Northern Territory, where traditional hunting methods are culturally significant and legally recognized.

Complex animal welfare legislation benefits from comprehensive, word-by-word review to ensure accuracy, fairness, and cultural sensitivity.

- **Recommendation:**

Extend the consultation period to ensure all affected sectors have the opportunity to provide informed, evidence-based input.

Engage directly with Aboriginal traditional hunting and fishing representatives to confirm legislative provisions respect and accommodate cultural practices.

4. Conclusion

CFANT **strongly** supports the objective of improving animal welfare through clear, enforceable, and evidence-based legislation. Our recommendations aim to:

- Remove ambiguity in wording that could inadvertently prohibit humane crocodile handling methods.
- Ensure legislative changes are informed by the most recent and relevant codes of practice.
- Provide adequate consultation time to ensure industry, scientific, and cultural perspectives are fully represented.

We welcome the opportunity to work with the committee to refine these provisions so they achieve the intended welfare outcomes without creating unnecessary operational or cultural conflicts.

Thank you

Mick Burns
Chairman

