



SUBMISSION

30 June 2024

Department of Agriculture, Fisheries and Forestry
Agriculture House
70 Northbourne Avenue
CANBERRA ACT 2601

Dear Sir/Madam

Re: Submission to the Renewal of the Australian Animal Welfare Strategy

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers and more than 2,700 beef cattle producers across the state, we work to secure a strong and sustainable livestock sector. South Australia's \$4.3 billion livestock industry is a key economic contributor to the state which supports 21,000 South Australian jobs across the red meat and wool industries.

Livestock SA welcomes the opportunity to provide a submission to renewing the Australian Animal Welfare Strategy (AAWS), which is important to our members and industries.

Introduction

Since the cessation of the Australian Animal Welfare Strategy in June 2014, the Australian livestock industry has demonstrated proactive leadership and made considerable and ongoing investments into the continual improvement of animal welfare. The Australian Animal Welfare Standards and Guidelines (AAWSG) set a unified standard for animal welfare, and the red meat and wool industries operate above these standards under industry-initiated animal welfare strategies and policies.

The Australian Beef Sustainability Framework (ABSF), developed by the beef industry and first release in 2017, includes priorities and targets towards animal welfare, above the current legislative standards. The ABSF Consultative Committee – which includes Australian and overseas retailers, banks, investors, environment and welfare non-government organisations, agribusinesses, researchers, government, policy organisations and industry groups – serves as a reference group for the ABSF with forums held twice a year to share information, identify emerging issues and opportunities, and obtain valuable input and feedback from stakeholders.

Theme one of the framework, *'Animal Care'*, prioritises enhancing animal welfare under indicators that include, animal husbandry, livestock transport, processing practices and health and welfare¹.

The framework animal care targets are:

- The Australian beef industry is committed to the pursuit of non-invasive replacements for surgical procedures. Until those are available, the industry aspires to 100% use of pain relief for these procedures by 2030.
- The feedlot industry is working towards all cattle in Australian feedlots having access to shade by 2026.

Progress towards these targets is monitored and findings made publicly available through the release of Annual Updates to measure industry's progress towards set goals and animal welfare continues to improve. The 2024 Annual Report demonstrated improvements towards targets including:

- Percentage of producers using appropriate pain relief for invasive husbandry practices
- Producer awareness of the Australian Animal Welfare Standards for Cattle
- Percentage of feedlot capacity with access to shade
- Percentage of producers undertaking low stress stock handling training
- Total mortality rate of cattle exported on sea voyages².

The Australian sheep industry also operates at the highest standards of animal welfare under the guidance of the Australian Sheep Sustainability Framework³ (SSF). As with the ABSF, the SSF was industry led, developed, monitored and publicly reported. The SSF prioritises animal welfare under the theme: *'Caring for Our Sheep'*. Animal care and handling are the focus areas with priorities to:

- Reduce, refine and replace painful husbandry practices
- Implement best practice sheep management
- Ensure humane processing and on-farm euthanasia.

The 2023 Annual Report determined new and improved methods of monitoring animal welfare indicators such as percentage of producers who mules their flock and percentage of producers using pain relief for lamb marking procedures such as tail docking and castration. The Annual Report also reported directional improvement in other animal welfare indicators including:

- Percentage of wool declared as non-mulesed/ceased mulesing
- Percentage of producers who have completed Lifetime Ewe Management (LTEM) training
- Total number of days per year spent by shearing trainers in woolsheds nationally
- Percentage of sheep transacted through NSQA saleyards
- Percentage of mortality on ships
- Percentage of lambs and sheep slaughtered through an establishment accredited by the Australian Animal Welfare Certification System (AAWCS)⁴.

The South Australian red meat and wool industries have also supported improving animal welfare through the SA Beef and Sheep Industry Blueprints⁵, which drive industry through investment into key areas to achieve set targets. These Blueprints, which have been developed and are progressed by the whole supply chain, align with the national beef and sheep sustainability frameworks. They

¹ Australian Beef Sustainability Framework (2017) <https://www.sustainableaustralianbeef.com.au/the-framework/best-animal-care/>

² Australian Beef Sustainability Framework Annual Update (2024) <https://www.sustainableaustralianbeef.com.au/resources/annual-update/>

³ Australian Sheep Sustainability Framework (2021) <https://www.sheepsustainabilityframework.com.au/>

⁴ Sheep Sustainability Framework Annual Report (2023) <https://www.sheepsustainabilityframework.com.au/>

⁵ SA Sheep and Beef Industry Blueprints <https://livestocksa.org.au/industry-development/industry-blueprints>

have recently been reviewed to ensure they remain ambitious and relevant. Updated targets include:

- 100 % of SA livestock consistently experiencing animal welfare practices which meet sector guidelines
- 100% SA livestock receiving appropriate analgesic and anaesthetic treatment during husbandry procedures by 2030⁶.

These national and state frameworks demonstrate the commitment of the Australian beef and cattle industries to animal welfare and are used to help drive animal welfare research, innovation, adoption and contemporary policy. This work has progressed without an AAWS, demonstrating livestock industries are capable of driving animal welfare improvements independently of government outlined requirements. Put simply, Australia's livestock industries are in a significantly different position in 2024 than they were in 2004 when the previous AAWS was implemented.

Livestock SA supports continuation of an industry led approach, which uses science- and evidence-based animal welfare to drive improvements across the red meat and wool supply chain. We also support a revised AAWS that supports, and augments where appropriate, the proactive animal welfare direction industry has set through existing frameworks.

Discussion Questions

Vision

Question 1: Does this vision statement reflect everything you feel an Australian Animal Welfare Strategy should aim to achieve? Question 1a: Is there anything else it should include?

There are some elements of the proposed vision statement that we consider need to be addressed and further clarified. We do not support the proposed statement as it stands.

The vision should not be calling call for the establishment of an Australian animal welfare system when there is already a system in place that is actively being improved. It is more appropriate that the vision for a future AAWS recognises the considerable investment and resources that have been applied to date, particularly by industry, in developing the animal welfare system we already have. The Australian livestock industry has an established animal welfare system and this needs to be recognised in the vision statement through support of this work.

We support the inclusion of bringing stakeholders together as it is important to truly drive outcomes that all relevant stakeholders are invested and working towards common goals. However, the word 'relevant' must be added before stakeholders. There are numerous animal rights/activist groups that are not truly stakeholders in animal welfare. They do not invest in improving animal welfare in commercial animal production, merely aim to have it abolished. Those involved in driving animal welfare should include stakeholders supportive of common goals and invested in practical animal welfare outcomes.

The inclusion in the statement of identifying national priorities with actions and outcomes is reasonable as this will be a nationwide strategy. However, it must not interfere with state-based animal welfare policies and recognise that animal welfare legislation is a state not federal responsibility. We support harmonisation of animal welfare policy through the revision and jurisdictional adoption of the AAWSG.

⁶ SA Red Meat and Wool Blueprint 2030 (soon to be released)

Including in the statement “*demonstrates to the public and international partners that Australia values the welfare of all animals*” is a broad statement and it must be recognised that views of animal welfare standards differ throughout the public and the world. To ensure this strategy is not driven by inappropriate perceptions of animal welfare, we strongly consider that animal welfare policy must be backed by current, validated scientific evidence. The banning of live export of sheep by sea was not driven by science but activism. This poor policy decision will create severe and lasting impacts on the Australian livestock industry, producers and Australia’s international reputation and we cannot afford to see further miscalculations in animal welfare policy.

Work Streams

Question 2: Do the above proposed streams cover the right priority areas for the strategy?

Question 2a: Are there other priority areas that you think are important and should be added to the strategy? Question 2b: Are there any you feel are not a priority area?

Livestock SA supports the proposed workstreams in the discussion paper in principle. However, more information is required on how these workstreams will function, their scope and responsibilities. Below is our feedback on the proposed workstreams based on the limited information provided.

Leadership and coordination – this stream establishes governance arrangements to oversee strategy implementation and coordination of activities.

To ensure true coordination and strategic implementation of activities that does not lead to duplication of work or hinderance of current strategies will require leadership from relevant industry groups. Strategies in place such as the ABSF and SSF and the implementation of the AAWSG for animal welfare involved significant time and investment and this strategy must not impede this work.

Research and development – this stream implements a coordinated approach to animal welfare research and extension activities.

Coordinating animal welfare research and extension activities is important and we support this work if it is done effectively. The South Australian Beef and Sheep Blueprints have proved an effective model to understand research and extension across the South Australian red meat and wool industries. The Blueprints bring together industry representatives from across the supply chain, researchers, extension professionals and government to provide a clear overview of the research landscape. This has led to leverage of research funding to improve outcomes – an approach that should be considered nationally.

Standards and implementation – this stream implements an overarching framework for standards development that identifies national priorities and streamlines development and adoption by jurisdictions.

Livestock SA support the AAWSG. We strongly believe that a renewed AAWS must support these standards and guidelines and not introduce new standards for animal welfare. We support reviewing the standards and guidelines through consultation with relevant stakeholders as required.

Education and communication – this stream promotes best-practice to industry and showcases outcomes to domestic audiences and international partners.

Livestock SA supports education of the wider public on the animal welfare achievements of the Australian livestock industry. The continual improvements made by the red meat and wool industries to improve animal welfare through investment into animal welfare research and targets in the ABSF and SSF should be showcased. There are misconceptions of the livestock industry due to activism and the promotion of incorrect information. The Australia public deserve to understand the truth behind our industries.

Reporting and compliance – this stream establishes systems to track outcomes and monitor compliance

Reporting is important to monitor the progress and outcomes of the strategy. Livestock SA supports monitoring compliance, provided that there are no increased administrative requirements to livestock producers. Livestock producers already undertake significant compliance and reporting activities through assurance programs such as the Livestock Production Assurance (LPA) Program, National Vendor Declarations (NVDs) and National Wool Declarations (NWDs).

Additionally in South Australia sheep producers must complete Animal Health Statements and sheep and cattle producers contribute significant funding to animal health and welfare through industry funds directed towards activities that improve the health and welfare of South Australian sheep and cattle. For example, in 2023-24 producers funded the following:

- \$165,132 for Sheep Pain Mitigation
- \$909,555 for Ovine Footrot Management
- \$295,610 for Biosecurity
- \$464,750 for Wild Dog Management Programs
- \$35,5353 for Melatonin Improving Ewe Productivity and Wellbeing Program
- \$171,873 for Sheep Lice Compliance Program⁷.

We therefore oppose any inclusion of additional administrative, reporting or financial requirements for South Australian sheep and cattle producers who already contribute to significantly to animal welfare.

International engagement – this stream contributes to our sustainable trade credentials by showcasing and maturing Australia's national approach to animal welfare.

South Australian producers export significant volumes of produce to international markets, with sheep and beef meat exports from South Australia valued at \$910 million and \$174 million for wool products in 2022-23⁸.

We therefore support engaging with our international partners on animal welfare. However, we must be mindful of the different influences on animal welfare that occur in different markets. For example, through live export of sheep, Australia contributed to global improvements in animal welfare by setting high animal welfare standards and imposing in-country requirements through ESCAS. However, the move to ban live exports, has damaged our reputation in these regions and will enable countries with lower animal welfare standards to trade into these markets, which naturally reduces the overall welfare of animals.

In our international engagement, it must also be made clear that Australia operates under a vastly different system to other regions of the world. South Australia is part of the oldest, most isolated

⁷ Sheep and Cattle Industry Funds Approved Projects (2023-24) <https://livestocksa.org.au/industry-funds>

⁸ Primary Industries Scorecard (2022-23) Department of Primary Industries and Regions https://www.pir.sa.gov.au/primary_industry/industry_scorecards?shorturl_scorecards

and geologically stable continent in the world. Australia is also the smallest, flattest continent, but largest island, in the world. Additionally, it is both the driest inhabited continent and vegetated land mass.

Livestock production is also the most geographically widespread agricultural activity in South Australia and across the country. As such, there are limitations on productive land for cropping and livestock are farmed in a range of conditions from high rainfall zone to the pastoral areas with minimal rainfall and large properties. It is a unique system. Livestock in Australia are bred to adapt to these conditions and our management practices are appropriate for the landscape, including long haul transportation of stock. The impacts of climate change are also likely to be significant in Australia, which is already prone to weather extremes such as drought, flooding and fires and this can all impact animal management and animal welfare. A goal of this strategy must be to communicate how we manage our livestock to maximise their welfare in the Australian conditions.

Recommendation

Provide more information about the proposed workstreams and during their development engage with all relevant stakeholders such as the livestock industry.

Question 3: Are there any shared factors affecting animal welfare that cut across all, or multiple, animal groups? For example: Climate change, innovation, workforce retention.

Question 3a: How can the Australian Animal Welfare Strategy address these in a practical way?

There are issues that impact across animal production industries. Climate change will impact all animal industries, but impacts will likely vary based on the region and type of production. The variable and unknown impacts of climate change on production animal welfare must be factored into the AAWS. This can include recognition that in times of prolonged drought, animal condition and welfare may not be optimum, but the support must be given to producers to manage animals during these times, rather than a heavy regulatory burden.

Workforce is also an issue impacting across animal agriculture. This includes access to labour and skilled professionals such as veterinarians. There is currently a shortage of large production animal vets in Australia, with remote areas such as the pastoral zone of South Australia severely underserved by veterinarians. This should also be considered in the strategy because it can impact on livestock animal welfare if producers are unable to access veterinary services when they need them. Holistic thinking is required if the strategy is to be useful. Investigating incentives and other methods to increase the number of skilled large animal production vets throughout regional Australia should be a focus of this strategy.

Biosecurity is also an issue relevant to all animal industries. The event of an emergency animal disease can result in a sudden and dramatic change in animal management, and it is vital that animal welfare is maintained during these times. The strategy should include improving resources and training for producers to manage the welfare of their animals in the event of an emergency animal disease and include recognition that during these times, animal welfare requirements may be different.

Recommendation

Inclusion of national issues impacting on livestock animal welfare such as climate change and shortages of skilled professionals such as large animal production vets in the AAWS.

Challenges

Question 4: What do you think are the biggest challenges facing Australia's animal welfare system?

The complexities of animal welfare in Australia across multiple species is one of the biggest challenges facing the Australian animal welfare system. Animal welfare considerations vary significantly between species and their place within the landscape and society. For example, welfare considerations of companion animals can vary to those of commercial production, racing or animals kept for conservation purposes.

While all animal species must have suitable animal welfare standards, it is important that these standards are appropriate for the species. The challenge can be understanding species specific welfare needs and not imposing other ideologies or standards onto them. For example, the needs of a companion dog bred as a lap dog, differ to those of a sheep in a commercial flock. To truly understand their needs consultation with knowledgeable people with the expertise to provide advice in animal welfare is needed.

Communication of animal welfare challenges to the wider community can also be a challenge. This is particularly true for the farming sector, where vast sections of the community are unaware of farming practices and the ongoing work of producers and the industry to improve animal welfare. With the constant flow of information that can be false and misleading through social media, this can be very difficult to counteract, and the sector needs ongoing support to help debunk untrue information. The increased use of Artificial Intelligence will likely compound this problem, as it becomes more difficult to know what information is true or false.

Recommendation

Recognition of the complexities of animal welfare and different challenges and support required across different sectors, such as the livestock industry.

Support to ensure the communication of factual information and investigation into methods to counter false and misleading information, including the use of Artificial Intelligence.

Question 5: Are there additional challenges in the animal welfare system that have not been listed above, which the renewed strategy should consider?

The livestock industry faces animal welfare challenges and has actively sought to address these challenges through collaborative decision making and investment under the direction of the ABSF and SSF. Social licence is taken seriously by the industry but the activism by extreme animal rights groups is a major challenge for the Australian livestock industry. These groups spread false information and can cause serious damage to the productivity of farms and the mental health of producers.

Breaches by extreme animal rights groups onto farming properties can jeopardise animal welfare, causing unnecessary stress to animals during times of high stress such as lambing or calving. Illegal on farm entry by these groups also increase biosecurity risks to farms and livestock, with the potential to introduce serious diseases such as footrot or Foot and Mouth Disease. These diseases can have serious animal welfare issues and if introduced onto a property cost producer substantially, with South Australian sheep producers reporting to have spent up to \$1 million to eradicate footrot off their property.

Recommendation

Recognition of the ongoing work of the Australian livestock industry to improve animal welfare and support for the livestock industry against the impacts of breeches onto farms of extreme animal rights groups.

Opportunities

Question 6: What do you think are the biggest opportunities for Australia's animal welfare system?

Australia is a world leader in animal welfare and there is an important opportunity to continue to build on this achievement through supporting science- and evidence-based animal welfare investment and practices. The livestock sector continues to seek the best animal welfare standards through the targets under the ABSF and SSF.

Promotion and support for this work is an opportunity to continue to educate the community and wider markets on the support for animal welfare across the Australian livestock sector. Australian produce is well regarded and sought after and ensuring customers across the globe continue to view our produce as a premium product with high animal welfare standards is a great opportunity.

Question 7: Are there additional opportunities for improvements in the animal welfare system that have not been listed above, which the renewed strategy should consider?

There are opportunities to bring together people with expertise in animal welfare and understand where improvements in animal welfare are needed. For example, producers with livestock care for their animals every day and their knowledge of animal welfare, behaviour and health must not be overlooked but incorporated into this strategy and future considerations of animal welfare.

There is also an important opportunity to create further collaboration between animal welfare research, development, extension, adoption, policy and legislation. Research and development are crucial to the ongoing development of methods to support animal welfare. To ensure the benefits of investment into research is maximised, linkages into extension is vital to lead to adoption and meaningful animal welfare outcomes. Further funding and support for the livestock sector to facilitate the transference of research into extension and adoption would be beneficial to support livestock welfare.

Question 8: Is there anything else you would like to be considered in the development of the strategy, within the scope described in this discussion paper?

Animal welfare compliance is critical to managing animal welfare concerns, provided it is undertaken by the most appropriate body to ensure the best possible animal welfare outcomes. Currently in South Australia, the responsibility of animal welfare compliance and enforcement sit with the RSPCA. We do not consider that it has the necessary expertise to enforce animal welfare in livestock species due to the unique requirements and circumstances of commercial livestock production.

Further, the RSPCA has a very clear and very public conflict of interest when it comes to the livestock industry. It consistently lobbies against many aspects of commercial livestock production. It took a leading role over many years in the recent animal rights movement to permanently ban live sheep exports by sea. It has many other publicly stated positions against livestock production practices and encourages others to adopt these positions.

Livestock SA strongly believe that animal welfare compliance should be the responsibility of a group with the knowledge and expertise to ensure that animal welfare cases are investigated correctly, breeches of animal welfare identified, and enforcement action taken where required. In other jurisdictions this responsibility largely sits with the respective department of primary industries. A renewed strategy presents the opportunity to review these arrangements to realise a nationally harmonised approach.

It is important to recognise that lack of an AAWS for the last 10 years has not reduced animal welfare in the livestock industry, the opposite has occurred. The Australian livestock industry has led and worked strategically and constructively to support animal welfare and implemented whole of supply chain frameworks (i.e. ABSF and SSF).

The role of a renewed AAWS should therefore be to support the ongoing work of the livestock industry. The industry has proven that it does not need to be directed by government but can be a leader in driving animal welfare outcomes – government should support the demonstrated success of this approach.

Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.org.au if you would like to discuss this submission further.

Yours sincerely

A solid black rectangular box used to redact the signature of Travis Tobin.

Travis Tobin
Chief Executive Officer