



Minister Jaala Pulford

Minister for Agriculture & Regional Development
Deputy Leader of the Government in the Legislative Council
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Dear Minister,

We are writing on behalf of both national and state industry organisations representing the sheep and goat producers, agents and saleyards. We provide united support for the Victorian Farmer's Federation position of the current mob based tracing system for sheep and goats which utilises the National Livestock Identification System (NLIS) accredited visual ear tags, movement documents, and recording of mob based movements on the NLIS database.

The current system is simple, cost-effective, well-accepted by industry and has demonstrated increased producer compliance with the assistance of continued extension and compliance activities.

We would like to state our objections to any move that would lead to the mandatory requirement of sheep and goats to be individually identified by electronic Radio Frequency Identification (eRFID), by outlining our key concerns:

1) NLIS (Sheep and Goats) is a national system for the identification of sheep and goats within Australia.

According to your own department's website *'The Victorian Government and livestock industry organisations have agreed to work together to fully implement the NLIS...'*¹

However, Victoria does not currently require 'Property to Property' recording for sheep and goat movements under the current agreed national system, i.e. Victoria has not legislated for this aspect of the NLIS.

2) Mandatory application of eRFIDs will not address the holes revealed in Victoria's biosecurity network.

The Victorian Auditor General's recent report into Biosecurity acknowledges these holes are the result of 'a decline in financial and staff resourcing.' Under the current NLIS Business Rules responsibilities of all stakeholders are prescribed, including *Rule 15.14.1 – Jurisdictions (including animal health and food safety authorities) and industries commit adequate resources to extension, technical support, compliance monitoring and enforcement.*

A traceability system utilises the NLIS accredited visual ear tags, movement documents, and recording of mob based movements on the NLIS database. Replacing a visual ear tag with an

¹ <http://agriculture.vic.gov.au/agriculture/farm-management/national-livestock-identification-system/nlis-sheep-and-goats/what-is-nlis-sheep>

eRFID will not address the holes revealed in the system. We request that your Government continues their obligation to support the whole traceability system, not just focus on the ear tag.

3) The Victorian ALP went in to the 2014 State Election on the platform of not introducing mandatory eRFIDs to the Victorian Sheep and Goat industries.

Ms Jacinta Allan stated that '*Labour will not be introducing mandatory electronic tagging of sheep until there is a nationally consistent approach that is affordable to farmers and supported by industry.*' (Weekly Times, 1 October, 2014)

4) The application of a mandatory system of eRFIDs will effectively amount to a massive cost shift to growers, despite NLIS being a commitment of both government and industry.

It is not just the cost of the tags themselves, but the cost of the infrastructure and the implementation of the infrastructure that will ultimately be borne by producers.

5) The application of a mandatory eRFID system will have many practical implications that have yet to be addressed, including the reliance on adequate telecommunications technology and the ability to read tags in fast moving animals in saleyards.

Mandating anything of this complexity would result in locking in one type of technology when, under the current voluntary system, there is a better environment for competition to develop between different vendors.

6) Additional to the OH&S implications of tagging a wild goat, the goat industry (worth \$241 million nationally in 2013/14) exports 90% of its product to the USA.

Tagging – which constitutes husbandry – would jeopardise the *rangeland* status and effectively shut down the industry.

Victoria having one system while neighbouring states operate under another is neither practical for producers, agents or saleyards nor advantageous in any regard. It also sends a weak message to our trading partners about our biosecurity and food safety systems. The application of eRFIDs in one state alone may create a piecemeal approach to NLIS across Australia, with no improvement in compliance (including biosecurity) and greater confusion along the entire supply-chain. We request that you abide by the assurances given prior to your government's election that mandatory eRFIDs would not be implemented.

We are asking all Governments to maintain the agreement forged in October 2014 at AGMIN; that states would continue to work at increasing compliance within the current national system. Industry and Governments have been working together to develop the NLIS Sheep and Goats Business Plan which outlines actions to enhance the current mob-based system. We are encouraged by the collaborative efforts on this important issue through the business plan and that there is widespread commitment to this action rather than the imposition of a completely unwarranted cost to sheep and goat producers, particularly one which may ultimately lead to no biosecurity or efficiency gains, whilst causing considerable damage to parts of the industry.

Sincerely,

Richard Halliday
WPA President

Jeff Murray
SCA President

Rick Gates
GICA President

Andy Madigan
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Kate McGilvray
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