



26 June 2018

Mr Phillip Moss AM
C/o Secretariat
Review of Regulatory Capability and
Culture in the Regulation of Live Animal Exports
Department of Agriculture and Water Resources
18 Marcus Clarke St
Canberra ACT 2601

Dear Mr Moss

The National Farmers' Federation (NFF) is the peak national body representing farmers and, more broadly, agriculture across Australia. It is one of Australia's foremost and respected advocacy organisations.

Since its inception in 1979, the NFF has earned a reputation as a leader in the identification, development and achievement of policy outcomes that champion issues affecting farmers and are dedicated to the advancement of agriculture.

The NFF and its members remain committed to the future of Australia's live export trade that meets the world class animal welfare standards set by our livestock producers and all reasonable Australians. We thank you for the opportunity to provide a submission into the Review of Live Animal Exports Regulatory Capability and Culture.

The circumstances leading to the images aired by 60 Minutes on 8 April 2018, are out of step with the expectations of the community, including the farming community. They were also inconsistent with the high animal welfare standards ordinarily upheld by exporters.

We offer the following points in response to your terms of reference:

- We believe that Department has sufficient regulatory power to regulate the live animal export industry. However, there is concern amongst industry about the prevailing culture in executing this regulation.
- It is clear that objective measurements such as mortality do not provide a full picture of the success of a voyage and we are supportive of the Australian Government's adoption of the McCarthy Review's recommendations that aim to shift the metric from mortality to the condition of animals throughout the voyage.
- The McCarthy Review also found there has been a tendency for the regulator to focus on peripheral, easy to enforce aspects, and not the address the more difficult, core issues like stocking density and suggested that there be more focus on key issues, and less on peripheral issues that divert time and resources.
- We are concerned about anecdotal indications that reportable mortality events have not been acted upon within sufficient urgency and rigour. Following NFF's review of the Mortality Investigation Report 65 and Mortality Investigation Report 69, it is our conclusion that the regulator has not adequately investigated or enforced the welfare standards as

described in ASEL to ensure ongoing improvement to animal welfare standards or bring transgressors to account.

- The NFF has to date, opposed measures such as an Independent Office for Animal Welfare that in our view would simply add another layer of bureaucracy from a person sitting in an office in Canberra. We must have improvements in the system and it must be driven by industry.
- The extensive livestock industries have implemented processes and systems through the Integrity Systems Company, consistent with the Australian Animal Welfare Standards and Guidelines, to manage and improve animal welfare throughout the production sector and supply chain. While Australian agriculture supports greater independent government monitoring, investigation and enforcement capability, the sector does not support the introduction of another overarching layer of bureaucracy in the agriculture sector.
- We recognise the proposal for an Inspector General for Live Animal Exports is confined to the live export sector. However, the membership maintains a number of questions in relation to:
 - how any such measure would impact on the broader supply chain;
 - whether it will deliver better enforcement by the regulator; and
 - how it will improve the operations of the industry players who have failed.
- The NFF recognises the requirement for a national approach to animal welfare. The NFF membership will continue to work towards a proactive industry-lead approach on improving animal welfare across the supply chain.
- It is vital that any proposal for an Inspector-General for animal welfare be developed in partnership with the broader agriculture industry, be driven by a culture of continuous improvement and that its role be informed by science-based evidence.
- It is pivotal to the future of the trade that the department is adequately resourced to fulfil its regulatory requirements and is furnished with the appropriate mix of skills that offers a true understanding of the industry.
- In areas that the Commonwealth does not carry regulatory responsibility, we believe the role of the Commonwealth is to:
 - Coordinate national agricultural animal welfare policy;
 - Coordinate co-regulation between industry and state and territory jurisdictions; and
 - Coordinate the national agricultural animal welfare research and development strategy.

Animal welfare is important to the community and it is important to farmers. Farmers value the trust of the community and are committed to continuously improving the welfare of our animals.

In many respects we as industry are already leaders through mechanisms such as developing industry standards and guidelines and incorporating animal welfare into our quality assurance systems – these efforts help build consumer and community trust in our practices and stewardship. However, we are conscious we must do more.

In executing this leadership and in building this trust, industry must work in partnership with governments and believe the Australian Government in particular has a significant role to play.

We are concerned that this role has not been fulfilled since the Australian Animal Welfare Strategy was devolved in 2013.

Also key to the partnership is the current standards and guidelines process as the mechanism for setting animal welfare standards in Australian agriculture.

To this end, I am pleased to enclose NFF's policy on the Australian Government's role in agricultural animal welfare that was unanimously endorsed at the NFF Members Council meeting of 29-30 May 2018.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Tony Mahar', with a large, stylized initial 'T'.

TONY MAHAR
Chief Executive Officer

NFF Policy: Australian Government Role in Agricultural Animal Welfare

The agricultural sector has a responsibility to be leaders in animal welfare for commercial livestock and production animals.

Industry is committed to continuous improvement in animal welfare and we take seriously our responsibility to consumers and the community.

To do this effectively industry must work in partnership with the Australian Government.

Industry sees the role of the Australian Government within this partnership is to:

- Coordinate national agricultural animal welfare policy;
- Coordinate co-regulation between industry and state and territory jurisdictions;
- Coordinate the national agricultural animal welfare research and development strategy.

The devolution of the Australian Animal Welfare Strategy largely removed the Australian Government's presence in national agricultural animal welfare policy matters. The Australian Government must re-establish its presence in national agricultural animal welfare in a partnership with industry that sees industry playing a strong role. The Australian Government should fulfil this role in the following ways:

- Focusing solely on limiting its scope to agricultural animal production;
- Becoming a coordinator striving for national consistency – not another regulator;
- Recognising the current standards and guidelines process as the mechanism for setting animal welfare standards in Australian agriculture.
- Recognising the current standards and guidelines process as the rightful source of industry/state and territory co-regulation for the minimum animal welfare standards.
- Recognising the importance of industry quality assurance systems in co-regulation.
- It must be guided by independent expertise, particularly in the fields of:
 - Commercial livestock and production animal systems;
 - Veterinary science;
 - Animal Welfare Science;
 - International trade;
 - Consumer engagement;
 - Industry value chains; and
 - Quality assurance programs.

The reasons for this position are as follows:

- Industry's role is to promote continuous improvement and appropriate standard setting for animal welfare given its dynamic connection to consumers and its knowledge of best practice.
- Federal standard setting is not an agile mechanism to achieve this as it will only create a regulatory burden.
- Producers have invested millions of their levy dollars into research and development to continuously improve animal welfare outcomes and these investments continue to be successful and must be supported.
- All animals deserve the dignity of being treated humanely – particularly those that are raised within our care for human benefit. As a sector the onus is on us to develop ways of demonstrating our integrity – but it must be industry that sets these standards, based on and informed by science.