

30 June 2024
Department of Agriculture, Fisheries and Forestry
GPO Box 858
CANBERRA ACT 2601

To Whom it May Concern,

Re: Renewal of the Australian Animal Welfare Strategy

Sheep Producers Australia (SPA) welcomes the opportunity to provide a submission to the Department of Agriculture, Fisheries and Forestry (DAFF) discussion paper on the renewal of the Australian Animal Welfare Strategy (AAWS).

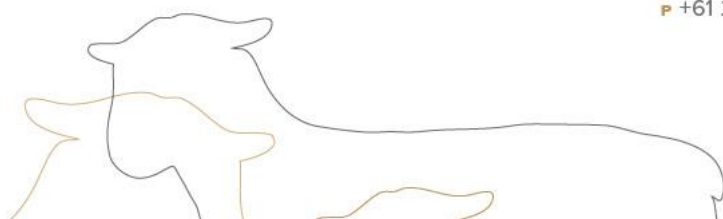
Sheep Producers Australia is the collective national voice on issues that affect Australian sheep meat production, representing close to 20,000 sheep farming businesses. This representation is across a range of issues, including animal health and welfare, biosecurity, natural resource management, emergency animal disease outbreak preparedness, market access and assurance and industry development. Our purpose is to provide strategic leadership for Australia's sheep industry, supporting a productive, profitable and sustainable future.

Sheep Producers Australia welcomes the Australian Government's commitment to renew the AAWS and looks forward to working constructively with legitimate partners in the AAWS process. We recognise the importance of national leadership and coordination to ensure Australia has in place a transparent national animal welfare system that is underpinned by science and evidence, driven by skilled management, responsive to community expectations and able to demonstrate our animal welfare credentials to the public – both within Australia and internationally.

SPA has consistently called on the Australian Government to uphold its responsibility to develop agricultural policy that is evidence-based, strategic, inclusive and collaborative. Minister Watt's announcement on 11 May that the Albanese Government will legislate to phase out live sheep exports by sea by May 2028 has shaken the agricultural community's trust in the government. The phase out decision ignores evidence and data, shows indifference to the consequences for regional communities and was announced without engaging affected industries. We are concerned that this approach will set a precedent for future decision making on national animal welfare policy and regulation – including the final form and content of a renewed AAWS.

Livestock industries seek assurance that the Australian Government is committed to genuine engagement with industry, in the development of evidence-based, strategic, inclusive policy that underpins a prosperous and sustainable Australian livestock industry. This should include a commitment to revisit the policy to phase out export of live sheep by sea.

Producers are at the forefront of animal welfare and understand that the health and wellbeing of their animals is fundamental to a sustainable industry – and of critical importance to stakeholders. As a result, good animal welfare is enshrined in industry accreditation systems, best practice guides and



risk management tools¹, and the industry-led, community-focused Sheep Sustainability Framework (SSF), in which Australian producers have made a commitment to continuous improvement and transparent reporting on industry practices. This understanding is also evidenced in the way the live sheep export industry has reformed following the temporary shutdown in 2018, delivering exemplary animal welfare performance.

The attached submission provides an overview of relevant sheep industry initiatives and achievements, and responds to questions posed in the AAWS discussion paper. In addition to those responses, SPA would like to draw the department's attention to the following priorities and considerations for the sheep meat industry in the development of a renewed AAWS.

A renewed AAWS must facilitate effective joint leadership on animal welfare policy

- The absence of national leadership and coordination on animal welfare policy and regulation is a key weakness in Australia's national animal welfare system, which has eroded confidence, stalled progress and created uncertainty.
- A renewed AAWS must re-establish effective national leadership and coordination on animal welfare policy and regulation, including a formal and ongoing role for industry.

Australian welfare standards must be science-based and adopted by all jurisdictions

- The Australian Animal Welfare Standards and Guidelines must continue to be informed by scientific advice and practical, evidence-based industry experience.
- Nationally consistent adoption of agreed Australian Animal Welfare Standards into state and territory legislation is essential and must be a priority action under a renewed AAWS. The Sheep Standards and Guidelines were endorsed in 2016 and have not yet been adopted by all jurisdictions. This creates uncertainty and undermines industry efforts to drive consistent adoption of best practice.

National welfare policy and regulation should be informed by science and fit for an Australian context

- The renewal of the AAWS must be underscored by the need for national animal welfare discourse, policy and regulation to be informed by science, evidence and pragmatism, rather than emotion-driven judgements about management practices or industries as a whole.
- The renewed AAWS must recognise that Australia's livestock management systems have evolved within the constraints and particularities of our production environment and will necessarily differ from systems employed elsewhere.

Extreme anti-animal production views do not have a legitimate place in welfare policy and regulation

- Participants in the AAWS process should represent a balance of views, but animal activist groups that are driven by an extreme anti-animal production agenda do not have a legitimate place in development of national policy and standards for animal welfare. The objectives of these groups are at odds with the objectives of a national system for animal welfare, and with the existence of a sustainable livestock-based food production sector.
- Legitimate animal welfare groups have an important contribution to make to the AAWS, but conflicts of interest must be managed. For example, the RSPCA has a clear conflict between its national and state lobbying and advocacy activities that target livestock production practices (including the live export of sheep by sea), its role in certification and the welfare compliance and enforcement roles delivered by RSPCA member societies at a state and territory level.

¹ E.g. Making More from Sheep (makingmorefromsheep.com.au), developed through MLA and Australian Wool Innovation, and risk management tools like Ag360 (ag360.com.au)

Industry is responsible for welfare management and maintaining community trust

- Livestock industries have responsibility for managing the welfare of production animals and are best placed to promote and drive continuous improvement in welfare outcomes.
- Producers value the trust that the community places in them and know that community acceptance of the way they care for animals is essential to livestock industry success.

Our livestock welfare credentials should be showcased

- The AAWS must facilitate communication about our significant production animal welfare credentials and achievements.
- A renewed AAWS should recognise and promote industry efforts to drive and transparently report on welfare practice improvement, including through the world leading SSF.

Industry should continue to co-invest in and guide prioritisation of welfare R&D

- Co-investment by levy-payers and government in research and adoption through the rural Research and Development Corporations supports high standards of welfare and continuous improvement. Industry must continue to identify priorities and guide investment to ensure producers and supply chain operators have access to the latest animal welfare information and tools that can be applied practically.

Should you wish to discuss this submission further please do not hesitate to contact me at ceo@sheepproducers.com.au.

Yours sincerely,



Bonnie Skinner
CEO
Sheep Producers Australia

SUBMISSION TO THE AUSTRALIAN ANIMAL WELFARE STRATEGY DISCUSSION PAPER

This submission is structured in three parts:

1. Introduction and overview of relevant sheep industry initiatives and achievements
2. Response to AAWS discussion paper
3. Sheep industry priorities for a renewed AAWS

1. Introduction

Sheep Producers Australia supports the proposed scope of the renewed AAWS as outlined in the discussion paper released by DAFF, namely, to facilitate joint leadership from the Australian Government and state and territory governments with a view to:

- Establishing a national framework for bringing key stakeholders together on animal welfare issues of national significance.
- Providing a forward direction for animal welfare in Australia to address community and international expectations.
- Maintaining Australia's commitment to modern, sustainable animal welfare practices informed by science and evidence.

Re-establishing genuine national collaboration and leadership on animal welfare through the renewed AAWS will help to provide confidence and clarity to industry, the community and trading partners about our shared priorities and commitment to animal welfare.

Australian sheep producers understand the importance of good animal welfare – not only because they genuinely care for their animals. Continuous improvement in sheep health and welfare is essential for a sustainable and profitable industry, and to maintain the trust of the community. As a result, good animal welfare is enshrined in industry accreditation systems and the industry-led, community-focused Sheep Sustainability Framework (SSF), and the red meat industry's strategic plan (Red Meat 2030). This understanding is also evidenced in the way the live sheep export industry has reformed following the temporary shutdown in 2018.

Sheep Sustainability Framework and Red Meat 2030

Australian sheep producers understand the importance of being aware of and responsive to community expectations about how animals are cared for. In 2021 the industry-led Sheep Sustainability Framework² (SSF) was launched, providing a framework to guide and transparently report on industry performance across key sustainability indicators.

The top two sustainability topics identified in a materiality assessment to inform the SSF were animal husbandry and handling, and animal wellbeing and welfare. As a result, 'Caring for our sheep' is one of four key themes in the SSF, with data collected annually to report publicly on industry performance and progress against indicators under four health and welfare priorities:

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

² <https://www.sheepsustainabilityframework.com.au/>

Collection and reporting of data to track sheep and wool industry performance against the SSF indicators is world leading and practice improvements have already been realised. The SSF testifies to the industry's commitment to meeting the changing expectations of customers, investors and the community, and ensuring the continued success of the Australian sheep industry.

A commitment to high standards of animal welfare, and responsiveness to consumer expectations on this issue, is also central to the red meat industry's strategic plan – Red Meat 2030³. The Red Meat 2030 plan has an objective for the red meat industry to “set the standard for world class animal health, welfare, biosecurity and production practices,” and sets out how this will be achieved through initiatives to: ensure whole-of-industry animal health and welfare standards and systems; adopting animal health, welfare biosecurity and production best practices; and optimising animal production for the environment and market.

Industry assurance programs and promotion of best practice management

The Livestock Production Assurance (LPA) program is industry's on-farm assurance program that underpins market access for Australian red meat. Producers who choose to participate in the LPA Program commit to carrying out on-farm practices that feed into and support the integrity of the entire system. Animal welfare is one of seven standard elements that make up the LPA program, and to maintain LPA accreditation producers must ensure “*On farm systems have been implemented to ensure the management of livestock is consistent with the requirements of the Australian Animal Welfare Standards and Guidelines, as amended from time to time (Standards and Guidelines).*”⁴

Producers may also choose to participate in additional assurance or certification programs for specific markets, which may specify additional welfare requirements.

Animal welfare knowledge and skills are also actively promoted through industry-led best practice management information programs like Making More from Sheep – a joint initiative of MLA and Australian Wool Innovation, which includes a module to assist producers to effectively understand and manage flock health and welfare. Tools developed to assist farmers with risk management also drive improved health and welfare practices, recognising the important link between welfare, productivity and sustainability.

Together these initiatives are a clear demonstration of the capability and willingness of our livestock industries to self-regulate on important matters like welfare.

Live sheep export

Live export by sea is an important component of the Australian sheep industry, and that industry has committed significant investment into research, development and adoption programs that enhance animal welfare outcomes and support the maintenance of its social licence to operate. The industry works determinedly with governments at all levels to ensure appropriate regulation is in place and adhered to.

The Australian live export industry has the highest standards of animal welfare in the world. The development of the Export Supply Chain Assurance System (ESCAS), which ensures animal welfare in market, is the first regulation of its kind globally. Coupled with the Australian Standards for the Export of Livestock (ASEL) and domestic animal health and welfare regulations, animals exported through the Australian live export trade are protected by legislation from paddock through to in country markets.

ESCAS and ASEL are the only animal health and welfare regulations of their kind globally, meaning Australian animals are the only animals to be protected throughout the live export trade; including past the point of sale. Loss of the Australian live sheep export trade will be a loss for global animal

³ <https://www.rmac.com.au/red-meat-2030>

⁴ <https://www.integritysystems.com.au/siteassets/lpa-standards-v23.pdf>

welfare. Our trading partners agree to these requirements, as we are considered a reliable supplier of high-quality livestock and dependable to meet their food security requirements.

The 2018 temporary suspension prompted regulatory changes related to heat stress and animal welfare requirements. Subsequently, industry implemented substantial reforms and voluntarily imposed a trade moratorium to support ongoing animal welfare outcomes, along with a suite of other measures. Since 2018, the industry has undergone significant change, demonstrating the industry's commitment to improve. The government's decision to phase out live exports by sea has been made in spite of these reforms, the exemplary welfare performance of the trade, and its ongoing importance to Australian sheep producers and regional communities.

2. Response to AAWS discussion paper

Vision

The AAWS discussion paper advises that “The vision statement will describe the aspiration for the future. It should be proactive, have a positive focus, and describe the type of system and values needed to ensure animal welfare is protected for all animals. In short, the vision articulates ‘why’ the strategy exists.” The proposed vision statement is:

To establish an Australian animal welfare system that brings stakeholders together, identifies national priorities with actions and outcomes, and demonstrates to the public and international partners that Australia values the welfare of animals.

The proposed text is not consistent with a vision statement, which should describe the desired outcome or future state, not a process for achieving that state. The vision statement from the previous AAWS was: *The welfare of all animals in Australia is promoted and protected by the development and adoption of sound animal welfare standards and practices.* SPA proposes the draft vision statement for the renewed AAWS be re-drafted to capture a desired future state for our national animal welfare system, in line with the previous AAWS vision statement. The vision should explicitly capture the desire for consistent national implementation of agreed welfare standards, given its importance to industry and to trading partners.

Proposed work streams

SPA understands that the renewed AAWS will include six chapters dedicated to specific animal groups, namely:

- Livestock and production animals
- Aquatic animals (including aquatic animals in production and wildlife)
- Animals in the wild (native, introduced and feral animals)
- Companion animals
- Animals used for work, sport and recreation
- Animals used in research and teaching

The six proposed streams of work have differing levels of relevance to each of the six animal groups, which will require careful management. SPA’s feedback is necessarily focused on the work streams as they relate to livestock and production animals but has relevance to the other animal groups that sheep producers may have responsibility for or manage. A renewed AAWS should manage the interdependencies between the work streams and animal groups – for example, by having in place systems to ensure new knowledge gained through scientific research and development informs welfare standards (where appropriate), and education programs.

We understand that at this early stage of strategy development the descriptions accompanying the work streams are high level. However, we offer the following comments and suggestions under the understanding that the work stream descriptions will guide the identification of detailed and specific priorities and tasks within the AAWS.

Leadership and coordination – “*this stream establishes governance arrangements to oversee strategy implementation and coordination of activities*”

- National leadership and genuine collaboration through a renewed AAWS will provide confidence and clarity to industry, the community and trading partners about our shared priorities and commitment to animal welfare. Re-established national leadership and coordination will drive genuine action and progress on stalled policy development.
- Industry is responsible for the welfare of production animals and must be represented at the highest levels of AAWS governance in a formal and ongoing role.

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

- Research and development are central to driving improved animal health and welfare outcomes, and through their levy payments Australian sheep producers have invested large sums into research, development, extension and adoption (RDE&A) for this purpose, via the rural Research and Development Corporations (RDCs) and Animal Health Australia. Sheep Producers Australia plays an important role in guiding expenditure on RDE&A, to ensure it is responsive to industry needs and market signals, and results in information and tools that are practical to apply through the supply chain.
- This work stream in the renewed AAWS should emphasise the importance of those responsible for animal care and management (such as producers) being engaged in the identification of welfare RDE&A priorities. The renewed AAWS must also recognise the essential role of extension and adoption, which should be tailored to ensure producers and supply chain participants have access to practical information and tools that they can understand and adopt into their management approaches.

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

- This is a critically important work stream for the livestock sector and should be a priority under the renewed AAWS. Standards and guidelines must continue to be grounded in science, informed by industry best practice and consultation.
- This work stream must include an action to promote adoption by jurisdictions. Lack of nationally consistent and timely adoption of welfare standards into state and territory legislation creates uncertainty for industry and the community. It also undermines industry efforts to drive uptake of best practice and provide assurance to customers about the welfare of livestock on-farm and through the supply chain.

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

- The discussion paper description of this work stream appears narrowly targeted at industry, which is at odds with the broader scope of the strategy.
- Communication of our animal welfare achievements and credentials to the public (within Australia and internationally) is essential, and the renewed AAWS provides an excellent opportunity to facilitate this. This should include the showcasing of existing industry programs that require and promote best practice animal welfare, such as the Livestock Assurance

Program and the Sheep Sustainability Framework, which captures the domestic value chain including farms, saleyards, transport, processing and live export.

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

- Reporting against agreed priorities and actions identified in a future AAWS will be important to demonstrate and drive progress. Reporting should be designed to draw on rather than replicate industry initiatives that track welfare performance, for example through the red meat sustainability frameworks and industry assurance programs.
- The discussion paper states that “this stream establishes systems to track outcomes and monitor compliance.” More detail is needed on the compliance element of the proposed work stream before making an assessment on the merits of including it in the renewed AAWS. Ensuring whole of supply chain compliance with legislated welfare standards is vital, and systems are in place to monitor compliance with animal welfare regulations at the Commonwealth, state and territory and local government levels.

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

- The AAWS presents an opportunity to showcase our world-leading approach to animal welfare – including our responsiveness to market signals and community concerns about how production animals are managed.
- Importantly, this stream of work should reinforce to / educate international partners that Australian producers are committed to continuous improvement in animal welfare, in line with the Australian Animal Welfare Standards – *which are developed for Australian production systems*.

Challenges and opportunities

SPA draws the department’s attention to relevant comments provided elsewhere in this submission, particularly the covering letter, response to the ‘proposed work streams’, and in section 3 ‘Sheep meat industry priorities for a renewed AAWS’.

3. Sheep meat industry priorities for a renewed AAWS

Sheep Producers Australia looks forward to working constructively with all legitimate partners in the AAWS renewal process. In addition to the commentary provided in response to the AAWS discussion paper, we draw the department's attention to the following important priorities and considerations for the sheep meat industry in the development of a renewed AAWS.

Shared commitment to develop policy that supports a prosperous livestock industry

- Livestock industries seek assurance that government is committed to genuine engagement with industry, in the development of evidence-based, strategic, inclusive policy that underpins a prosperous and sustainable Australian livestock industry. This should include a commitment to revisit the policy to phase out export of live sheep by sea.

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- Participants in the AAWS process should represent a balance of views, but animal activist groups that are driven by an extreme anti-animal production agenda do not have a legitimate place in development of national policy and standards for animal welfare. The objectives of these groups are at odds with the objectives of a national system for animal welfare, and with the existence of a sustainable livestock production sector.
- Legitimate animal welfare groups have an important contribution to make to the AAWS, but conflicts of interest must be managed. For example, the RSPCA has a clear conflict between its national and state lobbying and advocacy activities that target livestock production practices (including the live export of sheep by sea), its role in certification and the welfare

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