

31 May 2024

Animal Welfare Team
Conservation and Wildlife Branch
SA Department for Environment and Water

Via email: animalwelfareactreview@sa.gov.au

To Whom it May Concern,

Re: Submission to draft Animal Welfare Bill 2024

Sheep Producers Australia appreciates the opportunity to provide a submission in response to the South Australian Government's draft Animal Welfare Bill 2024 (the Bill), and supports the points made by Livestock SA in its recent submission on the Bill.

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 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. Animal welfare is enshrined in industry accreditation systems including Livestock Production Assurance (LPA), and the industry-led, community-focused Sheep Sustainability Framework (SSF)¹, in which Australian producers have made a commitment to continuous improvement and transparent reporting on industry practices.

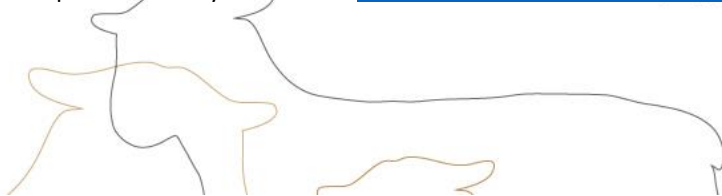
'Caring for our sheep' is one of four key themes in the SSF, and data is collected annually to report publicly on performance and progress against indicators under four health and welfare priorities:

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

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 Ngunnawal Country Level 2 The Burns Centre
28 National Crt Forrest ACT 2603
admin@sheepproducers.com.au
PO Box 4225 Manuka ACT 2603

¹ Sheep Sustainability Framework <https://www.sheepsustainabilityframework.com.au/>



The sheep meat industry's commitment to animal welfare, demonstrated through initiatives like LPA and the SSF, is underpinned by the Australian Animal Welfare Standards and Guidelines process²- our national, science-based, consultative system for setting and reviewing practical standards for livestock welfare. Consistent adoption of agreed welfare standards through legislation by all jurisdictions is a priority for industry. The absence of a consistent approach by jurisdictions creates uncertainty and undermines industry efforts to drive consistent adoption of best practice.

SPA understands that the Australian Animal Welfare Standards for Sheep³, endorsed in 2016, were mandated through regulations under the South Australian Animal Welfare Act in 2017. We strongly support Livestock SA's recommendation that regulations made under a new Animal Welfare Act should be based on the agreed National Animal Welfare Standards and Guidelines. The standards should apply to interpretation of the proposed new 'duty of care' provision in relation to livestock production, as should an understanding of the unique factors impacting commercial production of livestock in an Australian environment.

Ensuring whole of supply chain compliance with legislated animal welfare standards is vital, and appropriate systems must be in place to monitor and enforce compliance and manage and penalise breaches. The provision of increased powers for Authorised Officers under a new Animal Welfare Act is appropriate, provided they are appropriately trained to understand the intent of the legislation and how it applies in the context of livestock production. Authorised Officers should be trained to understand normal livestock management practices and what is and isn't reasonable in terms of animal welfare in commercial livestock production systems.

The provision to establish an Animal Welfare Fund provides an important opportunity to deliver activities that support the intent of the Act, and SPA agrees with the suggestions made by Livestock SA in relation to the Fund. In particular, that funds should be directed to animal welfare education, communications to 'bridge the gap' and build understanding of livestock industry welfare initiatives, and upskilling of supply chain participants to assist in meeting welfare obligations under the new Act.

Animal welfare is a top priority for the Australian sheep industry, and SPA welcomes the South Australian Government's commitment to modernise its welfare legislation. As outlined in this submission and the submission provided by Livestock SA, appropriate regulation supports livestock industries to drive continuous welfare improvements, and any reforms to regulation must be practical, based on current scientific knowledge and recommended industry practice, fairly applied, and contribute to a nationally consistent system.

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

Yours sincerely,



Bonnie Skinner
Chief Executive Officer
Sheep Producers Australia

² Australian Animal Welfare Standards and Guidelines <https://animalwelfarestandards.net.au/>

³ Australian Animal Welfare Standards and Guidelines for Sheep
<https://animalwelfarestandards.net.au/welfare-standards-and-guidelines/sheep/>