

15 March 2023

INSPECTOR GENERAL OF ANIMAL WELFARE AND LIVE ANIMAL EXPORTS CONSULTATION

Australian Dairy Farmers (ADF) is the national policy and advocacy body providing collective representation for dairy farmers in Australia. ADF has been representing the national interests of dairy farmers for over 70 years in its own right and as a member of Australian Dairy Industry Council, the National Farmers' Federation and Animal Health Australia.

ADF's members include United Dairy Farmers of Victoria, Tasmanian Farmers and Graziers Association, South Australian Dairy Association, West Australian Farmers, Queensland Dairyfarmers' Organisation and New South Wales Farmers.

BACKGROUND

The Australian Government has announced its intention to establish an Inspector-General of Animal Welfare to strengthen animal welfare compliance and increase accountability and transparency for animal welfare in livestock exports.

This will be implemented by expanding the current office of the Inspector-General of Live Animal Exports to include animal welfare related objectives and expertise, forming an Inspector General of Animal Welfare and Live Animal Exports (IGAWLAE).

Through the Department of Agriculture, Fisheries and Forestry, stakeholders have been provided a consultation paper which informs stakeholders of the Government's commitment and invites submissions on the role of the IGAWLAE, ahead of implementation. This submission encapsulates ADF's views.

RESPONSE TO QUESTIONS ON OBJECTIVES FOR THE IGAWLAE

General comments

The Australian dairy industry commits to striving for the health, welfare and best care for all our animals throughout their lives. On ADF's behalf, its Farm Operations Policy Advisory Group (FO-PAG) aims to improve Australia's animal health and welfare system through cooperative programs aligned with other industries and governments.

Nationally, over 1,300 dairy farms (around 26 per cent of dairy farms) were estimated to have participated in the dairy live-export trade in 2019/20. The live export of dairy cattle from Australia for breeding programs has seen significant growth over the last 20 years, from just under 20,000 head of cattle in 2001/02 to over 90,000 head of cattle in 2020/21. The free-on-board (FOB) value of this trade in real terms has increased almost four-fold, from approximately \$56m in 2001/02 to almost \$258m in 2020/21.

The Australian dairy industry supports the ongoing export of breeding cattle in accordance with Australian Standards for the Export of Livestock (ASEL). The Australian dairy industry agreed to the introduction of a statutory levy on the export of dairy cattle to contribute funding for LiveCorp activities, with any funds raised to be spent in consultation with the dairy industry, to facilitate improvements in the dairy cattle export trade.

ADF acknowledges the establishment of an IGAWLAE; however, the title of the consultation paper, "Inspector General of Animal Welfare consultation", was somewhat misleading in that the Commonwealth only has jurisdiction over the welfare of livestock being exported and not domestic

animals, which is the purview of the state and territory governments. It is only upon reading the whole paper that this is clarified.

ADF seeks clarification on the Terms of Reference of the IGLAWLAE. ADF specifically seeks assurance that the IGLAWLAE would be an independent entity (as is the case, for example, with the Inspector General for Biosecurity) – that is, independent from industry, welfare groups and Government. ADF considers that an independent, science-based approach to welfare in live export must be a critical component of the Terms of Reference for the IGAWLAE. Importantly, such independence would enhance the credibility of the office when informing the general public of its recommendations for changes to the long-running practice of exporting livestock.

Specific comments

The Department has requested a response to six broad questions to develop objectives for the IGAWLAE. These questions are copied below (in italics), with Australian Dairy Farmers' comments following each:

1. *What animal welfare objectives related to livestock exports would be most valuable and why?*

In the submission paper, potential objectives of the IGAWLAE are listed as:

- a) reviewing/reporting on the performance of functions and exercise of powers by the department when assessing and approving animal welfare-related operations of regulated entities (exporters, registered establishment occupiers, accredited veterinarians);*
- b) reviewing/reporting on the performance of functions and exercise of powers by the department concerning detection of non-compliance with the Commonwealth's animal welfare requirements and standards for livestock exports;*
- c) reviewing/reporting on how the department conducts animal welfare-related investigations for livestock exports;*
- d) reviewing/reporting on the Commonwealth's interaction with state and territory animal welfare enforcement agencies;*
- e) review or report on the way the department currently publishes information regarding animal welfare non-compliance investigations and reportable mortality investigations for livestock exports;*
- f) review or report on the current process for reports (to be tabled in Parliament every 6 months) that include livestock mortalities on every sea voyage;*
- g) review or report what is currently provided to the Minister to include in reports to the Parliament;*
- h) review or report on how animal welfare outcomes for livestock exports are communicated.*

ADF considers that all of the potential objectives listed would be valuable as an initial step and recommends an additional objective:

- i) changes be made to the above objectives based on the findings of the reviews.*

2. *What other objectives related to livestock exports could be considered within the scope of the IGAWLAE's work?*

Review/report on the adequacy of the Independent Observer (IO) reports to monitor animal welfare on voyages (see also point 4 below).

3. *How should the objectives related to livestock exports be prioritised (if not all could be included)?*

The objectives that are most likely to improve welfare outcomes should be considered as the higher priority areas. From the list in question 1 (above), these would most likely be (a)-(c), then (g) and (f) as the higher priority objectives.

4. *What animal welfare information related to livestock exports would be valuable to be included in reports to the Parliament?*

More quantitative data on indicators of animal welfare (such as disease or injury) in addition to mortality rates or heat stress indicators. The IO reports contain qualitative data on morbidity (in cattle, typically respiratory disease, lameness, pinkeye) but it is difficult to evaluate if the disease incidence on the voyages is within expected levels or if it is a welfare issue. Published incidence rates for key diseases or injuries would add to the transparency sought by the IGAWLAE.

5. *What animal welfare information related to livestock exports would be valuable to be published on the department's website?*

As described in the answer to question 4, with the caveat that it should be the role of the IGAWLAE to ensure published data are presented in a manner that is understandable and minimises the potential for misinterpretation.

6. *Considering the objectives of the IGAWLAE, what experience, skills and capabilities would be desirable in recruiting animal welfare expertise/staff into the office?*

Personnel with a veterinary or animal welfare science background, with a thorough knowledge of the industries involved, would be desirable when recruiting expertise/staff into the office. It is important that animal welfare is approached scientifically and practically, not emotionally. Also, to advance the elements described in 4. above, regarding quantitative measures of animal welfare through health data, it would be advantageous to engage veterinarians who have industry experience to overlay their academic and technical qualifications.

END