

# **Regulator Performance Framework 2018-19 self-assessment for Agriculture**

## **LIVE ANIMAL EXPORTS**

## Live Animal Exports

Australia exports livestock, non-livestock species (such as cats and dogs, horses, chicks and aquatic species) and reproductive material. The major species of livestock exported include sheep, cattle, buffalo and goats.

Our responsibilities and powers in relation to the live animal exports trade are defined in the *Export Control Act 1982* (Export Control Act), the *Australian Meat and Live-stock Industry Act 1997* (AMLI Act) and associated orders, regulations and standards. The legislation underpins our export certification system, ensures that goods exported will meet importing country requirements, and that the health and welfare of livestock is maintained.

As a regulator, it is our responsibility to ensure exporters meet high animal welfare standards during export and once livestock arrive in importing countries. This is underpinned by the Australian Standards for the Export of Livestock (ASEL) and regulations that underpin the Exporter Supply Chain Assurance System (ESCAS).

Our export certification system involves a range of regulatory activities that include the licensing of live animal exporters, the registration of pre-export facilities (registered premises), accreditation of veterinarians involved in the trade (Australian Government Accredited Veterinarians), and approval of in-country supply chains (through ESCAS). Licensed exporters are audited regularly to ensure ongoing compliance with the legislation. Departmental veterinarians inspect livestock and export requirements prior to issuing health certificates and export permits.

**Figure 1: Key live animal export statistics, 2018–19**

We deploy independent observers (IOs) on board vessels to provide additional assurance on livestock export voyages on the effectiveness of exporter arrangements in managing animal welfare. The role of an observer is to monitor, observe and report on activities in approved export programs, for the purpose of ensuring the health and welfare of live animals in the course of export activities.

Compliance with the export chain is critical in ensuring we regulate live animal exports for the purpose of managing biosecurity risks, as well as maintaining high animal welfare standards. This provides assurance that the livestock meet the destination country's import requirements when issuing the relevant export documentation and that livestock exports meet animal welfare standards.

In 2018–19, the department took action by cancelling two export licences in response to footage of sheep voyages to the Middle East. There were six reportable mortality events on export voyages by sea. Staff conduct investigations into voyages where the mortality rate of the consignment exceeds a threshold (outlined in ASEL). We received 27 reports of ESCAS non-compliance: 18 were self-reported by exporters and nine reports were received from third parties, including four from Independent Observers. Alleged ESCAS non-compliance largely relates to livestock moving outside of the exporter's approved supply chain and non-compliant livestock handling. Mortality and ESCAS non-compliance investigations are conducted by our staff and published on the department's website to provide greater transparency of the live export trade.

In last year's report we acknowledged a significant need to improve our performance as a live animal export regulator. At that time we rated ourselves as a 'regulator in transition'. Since then we have initiated a major program to identify deficiencies and make changes to our regulatory framework and practice in relation to live animal export regulation.

In October 2018, we published Mr Phillip Moss's *Review into the regulatory capability of the Department of Agriculture and Water Resources* in the regulation of live animal exports (the Moss Review), as well as the government and department's responses.

The Moss Review found there was a need to improve our regulatory framework and practices to prevent non-compliance, respond to non-compliance in an effective way, and deliver strong animal welfare outcomes to support a sustainable live animal trade.

We have made good progress implementing Moss Review recommendations. By 30 June 2019, 15 of the 31 recommendations had been either implemented in full or considered business as usual. This includes, for example:

- re-establishing an Animal Welfare Branch to review and deliver the revised ASEL, undertake systems verification and deliver improved stakeholder engagement
- establishing a Principal Regulatory Officer to help connect all parts of the regulatory chain to the wider practice regulatory practice in the department.

Other actions are helping to ensure we are a transparent and well-engaged regulator, our staff are well trained and supported, and animal welfare is integral to our regulatory approach.

Since the introduction of the 2015 Cost Recovery Implementation Statement (CRIS), our live animal exports regulatory costs have been under-recovered by over \$2 million per year. Following the Moss Review and other regulatory reforms, such as the introduction of the Independent Observer Program, the amount of under-recovery has significantly increased.

To address this, we are developing a new CRIS to better consider cost drivers and reflect the actual cost of undertaking our regulatory activities. Of note, one key recommendation of the Moss Review was that industry pay for the full cost of regulation. It is the intention of the upcoming CRIS to implement this recommendation. Continued under recovery, and the financial pressure this places on the regulation of live animal exports, could result in a backsliding of progress in regulatory outcomes.

Based on these significant reform activities and progress implementing Moss Review recommendations, we now categorise ourselves as a 'sound regulator'. We continuously look for innovative opportunities and invest in business improvements so that, by working smarter, we are better placed to fulfil our regulatory function. This is supported by our assessment against the performance metrics.

## KPI 1 — We consider the impacts of our regulation

**Objective:** We take account of the operating environment of our regulated entities and stakeholders.

Performance Measures	Targets	Results
Our regulatory practices take into account the impact of regulation on stakeholders and regulated entities.	New and amended regulations are supported by best practice regulatory impact analysis that includes consultation on impacts.	<b>Rating: Managed</b> <ul style="list-style-type: none"> <li>We consider the regulatory burden for individuals, businesses and community organisations before we amend or make new regulations. Currently the department consults on impacts to the business through various streams. This work is overseen by the Office of Best Practice Regulation (OBPR).</li> <li>Where the regulatory impacts are deemed significant by OBPR, we prepare regulation impact statements (RISs) and consult with stakeholders and regulated entities on the impacts of the proposed changes.</li> <li>In 2018–19 we undertook consultation on proposed changes to the Australian Standards for the Export of Livestock, and the export of sheep to the Middle East. This work will help inform the RIS and agreed policy, with further consultation on these matters to be delivered in 2019-20.</li> <li>We also routinely consult stakeholders and regulated entities on a range of regulatory and related matters, even where a RIS is not required. This takes account of the impact of regulations on our regulated entities.</li> </ul>
Our regulatory practices take into account the impact of regulation on stakeholders and regulated entities.	We engage with our stakeholders on implementation and compliance approaches.	<b>Rating: Managed</b> <ul style="list-style-type: none"> <li>We actively consult with and provide updates to our stakeholders through channels such as the department's online <i>Have Your Say</i> platform, monthly live animal export industry teleconferences and bi-annual face-to-face meetings, and face-to-face meetings and teleconferences with individual exporters/industry stakeholders as required. We also utilise a range of other forums such as industry annual conferences and LIVEXchange to meet with exporters individually and collectively to discuss regulatory reforms.</li> <li>We have formally expanded engagement with industry and the community by re-establishing the Live Export Animal Welfare Advisory Group (LEAWAG). This group brings together representatives from industry, animal welfare organisations, academia and state and territory governments.</li> </ul>

Performance Measures	Targets	Results
Our regulatory practices take into account the impact of regulation on stakeholders and regulated entities.	We consider the operating environment impacting the Department and regulated entities.	<p><b>Rating: Managed</b></p> <ul style="list-style-type: none"> <li>Where the regulatory impacts are deemed significant by OBPR we prepare regulation impact statements (RISs) and consult with stakeholders and regulated entities on the impacts of the proposed changes.</li> <li>We consult closely with our regulated entities on other policy, operational and administrative changes to understand any impacts to the department and our regulated entities. For example, we continue to work across divisions and consult with stakeholders about the ongoing implementation and management of the Independent Observers program.</li> </ul>

## KPI 2 — Our communication with regulated entities is clear, targeted and effective

**Objective:** Our communication with regulated entities and stakeholders is effective and substantive.

Performance Measures	Targets	Results
Our guidance and information is tailored to the needs of regulated entities accessible.	Risk-based frameworks, strategies and service standards are available on our website and the information is regularly reviewed to ensure currency.	<b>Rating: Sound</b> <ul style="list-style-type: none"> <li>All relevant legislation is publicly available on the Federal Register of Legislation. Stakeholders can access legislation, relevant orders, standards, guidance material, and Export Advisory Notices (EANs) on our website.</li> <li>Our client service standards are published on our website and have been updated to take incorporate specific requirements for assessing self-reported and third party reported non-conformances. This provides a framework for meeting client expectations and delivering outcomes within agreed timeframes.</li> </ul>
We engage with regulated entities on potential changes to regulatory policies, practices or services.	Advice notices and guidance material are up to date, accurate, accessible and in plain English.	<b>Rating: Managed</b> <ul style="list-style-type: none"> <li>We ensure stakeholders are aware of changes to regulatory policies, practices and procedures through EANs. We make these notices publicly available on the department's website and publish them in a format that is easy to understand.</li> </ul>

Performance Measures	Targets	Results
We engage with regulated entities on potential changes to regulatory policies, practices or services.	We routinely consult with stakeholders on how we administer regulation, seek their advice on significant changes and explain our decisions.	<p><b>Rating: Managed</b></p> <ul style="list-style-type: none"> <li>• Our engagement with key live animal export industry representatives, animal welfare groups, livestock producer groups and peak bodies is ongoing and operates through formal and informal processes. This includes through bi-annual meetings with LEAWAG.</li> <li>• We hold monthly teleconferences and bi-annual face-to-face meetings with exporters to advise them of any changes to policies, processes and procedures, as well as how we administer the regulations.</li> <li>• Before publishing EANs, we consult with key industry bodies such as MLA, LiveCorp and ALEC for review/comment.</li> <li>• We have a number of topic-specific inboxes and a live animal exports phone hotline where stakeholders direct queries and feedback.</li> <li>• We conduct targeted consultations and engage with experts and industry representatives as appropriate.</li> <li>• Our 'Have Your Say' website is the key online platform used to consult on major regulatory changes.</li> </ul>



### KPI 3 — Our actions are proportionate to the regulatory risk being managed

**Objective:** We apply a risk-based, proportionate approach to compliance, engagement and enforcement activities.

Performance Measures	Targets	Results
Our regulatory frameworks are supported by best practice compliance strategies that are risk based.	We use information, data, analysis and intelligence-based approaches to determine risk, and consider the circumstances of regulated entities.	<p><b>Rating: Sound</b></p> <ul style="list-style-type: none"> <li>• We adopt a regulatory approach that takes into account compliance history and overall risk of the activities. This is set out in our regulatory policies and operating procedures.</li> <li>• We have deployed Independent Observers (IOs) on voyages to provide additional assurance of the effectiveness of exporter arrangements in managing animal health and welfare.</li> <li>• We have conducted trials such as installing monitoring devices to monitor wet bulb temperature and other conditions on-board livestock vessels, and match these measurements to visual recordings. This information is being used to further inform policies, particularly in relation to the export of sheep to the Middle East.</li> <li>• We use compliance and enforcement tools tailored to the identified risks and behaviour of our regulated entities. These include inspections, audits and investigations. Enforcement tools such as additional audits, infringement notices or court action are employed where warranted, including where a cooperative approach has been unsuccessful.</li> </ul>

Performance Measures	Targets	Results
Our regulatory frameworks are supported by best practice compliance strategies that are risk based.	Our regulators employ a range of compliance and enforcement tools.	<p><b>Rating: Managed</b></p> <ul style="list-style-type: none"> <li>• Our approach to compliance is outlined in our Compliance Statement for the Export of Livestock.</li> <li>• We have compliance and enforcement tools in place such as ESCAS, Approved Arrangements, inspections, document verification, random audits of consignments, and deployment of IOs.</li> <li>• Enforcement options include, for example, applying administrative measures, applying conditions (e.g. to an export licence, export supply chain, etc), suspending or cancelling an export licence and varying or revoking ESCAS approval.</li> <li>• Legislation governing the export of livestock also provides a range of civil and penalty provisions for certain non-compliant activities. Criminal prosecutions are the most severe compliance measure available to the department.</li> <li>• We are mapping all regulatory processes to better understand regulatory risks, gaps in the regulation and potential control points throughout the live animal exports control supply chain.</li> </ul>
Our regulatory frameworks are supported by best practice compliance strategies that are risk based.	Our staff are provided with appropriate training and guidance materials to support their regulatory compliance roles.	<p><b>Rating: Managed</b></p> <ul style="list-style-type: none"> <li>• Recruitment activities for staff include a specific focus on skills and expertise, particularly in veterinary and animal science. Our staff also work closely with and seek professional advice from officers in the department's Compliance and Legal and Assurance Divisions, who have specific skills and expertise in legal, investigation, compliance and enforcement matters.</li> <li>• A regulatory training framework has been developed to identify the skills and capabilities necessary to regulate live animal exports. The framework sets out the training and level of knowledge required to regulate and ensure compliance with live animal exports and animal welfare standards. This is currently being rolled out, with new induction training and training in administrative law and defensible decision making delivered throughout this period.</li> </ul>

Performance Measures	Targets	Results
Eligible regulated entities receive tailored approaches based on an understanding of their operating environment and risk profile.	We apply a graduated approach to compliance activities that provides for earned autonomy, within legislative parameters.	<p><b>Rating: Managed</b></p> <ul style="list-style-type: none"> <li>• We work to ensure that participants of the trade understand and comply with their regulatory obligations and that appropriate and proportionate action can be taken when non-compliance is suspected or detected. This work helps ensure the ongoing integrity of the livestock animal export regulatory system.</li> <li>• We provide opportunities for exporters to efficiently obtain appropriate export certification through streamlined processes that recognises compliance.</li> <li>• Approved Arrangements describe the operations which, when correctly applied by a livestock exporter business, will effectively manage the preparation and certification of livestock exported from Australia. While guidance is provided, it is the exporter that decides how it meets requirements. Mechanisms used by the department to monitor performance include audits, inspection of livestock and verification of documentation.</li> <li>• We are working with industry to allow (via appropriate policy and regulations) the use of third party providers in delivering assurance services as an alternative way for exporters to demonstrate compliance with ESCAS.</li> </ul>
Eligible regulated entities receive tailored approaches based on an understanding of their operating environment and risk profile.	Our compliance responses are coordinated and undertaken with appropriate authority and accountability.	<p><b>Rating: Managed</b></p> <ul style="list-style-type: none"> <li>• We exercise the necessary powers, regulatory capabilities and investigative capacity to ensure that animal welfare standards are met and export markets remain open. We work across relevant areas of the department, including regulatory, legal and enforcement areas to ensure a coordinated response.</li> <li>• We meet with state and territory livestock animal exports and animal welfare regulators to share information, clarify roles and responsibilities and better understand jurisdictional responsibilities along the live animal exports supply chain.</li> <li>• We are reviewing all delegations and regulatory powers to ensure appropriate authority and accountability.</li> </ul>

## KPI 4 — Our compliance and monitoring approaches are streamlined and coordinated

**Objective:** We base our monitoring and inspection approaches on assessed risk and where possible, we take into account the operating context.

Performance Measures	Targets	Results
There are demonstrated benefits to regulated entities from our efforts to streamline and coordinate our regulatory activities.	We regularly review our business processes with a view to streamlining where possible.	<b>Rating: Sound</b> <ul style="list-style-type: none"> <li>We continue to explore options to improve and modernise technology to improve our business processes. This includes commencing work on a regulatory information management system, which is in the early stages of development and aims to support the transfer of information from exporters to/from relevant areas across the department.</li> <li>We are currently mapping all regulatory processes to better understand regulatory risks, gaps and opportunities in the regulation and potential control points through the live animal exports supply chain. Findings of this work will help ongoing business improvement processes.</li> </ul>
There are demonstrated benefits to regulated entities from our efforts to streamline and coordinate our regulatory activities.	Our published service standards are met or exceeded.	<b>Rating: Sound</b> <ul style="list-style-type: none"> <li>Our client service standards have been developed to ensure we are meeting client expectations and are delivering our services within agreed timeframes. We work hard to meet or exceed our service targets.</li> </ul>

**Objective:** We share information and coordinate our compliance activities within the department and with other regulators as appropriate, to minimise duplication and increase efficiency.

Performance Measures	Targets	Results
Business processes and services are improved through the better use of modern technology, agreed service standards.	We analyse complaints, information and other feedback from our regulated entities to understand trends and make improvements where possible.	<p><b>Rating: Managed</b></p> <ul style="list-style-type: none"> <li>• We actively analyse complaints and feedback (both positive and negative) and where possible, make improvements on information provided publically to better assist our regulated entities.</li> <li>• We have established formal and informal mechanisms to engage with our regulated entities through channels such as topic specific email inboxes, monthly teleconferences, bi-annual face-to-face meetings and meetings with individual exporters at their request. We receive complaints, information and other feedback, and actively analyse information provided and make business improvements where possible.</li> <li>• We have established a whistleblower hotline to receive complaints and other information from staff, regulated entities and other interested parties. The Australian Meat and Live-stock Industry (Export of Sheep By Sea to the Middle East) Order 2018 requires all registered premises, embarkation ports and vessels to display posters about the hotline. Details about the hotline are also provided on our website.</li> </ul>

Performance Measures	Targets	Results
Business processes and services are improved through the better use of modern technology, agreed service standards.	We collaborate and coordinate with stakeholders, other relevant regulators and regulated entities to reduce compliance costs and improve efficiency of our regulatory frameworks.	<p><b>Rating: Managed</b></p> <ul style="list-style-type: none"> <li>• We continue to meet with state and territory livestock exports and animal welfare regulators to share information, clarify roles and responsibilities and better understand jurisdictional responsibilities along the live animal exports supply chain.</li> <li>• We are exploring options to renew and refine a collaborative, national approach to all animal welfare issues, including relating to live animal exports.</li> <li>• We have established formal information sharing arrangements with the Australian Maritime and Safety Authority (AMSA). This includes sharing information relating to incidents, regulatory changes that affect live animal exports, ship clearances delays, etc. Our staff also attend biannual AMSA and stakeholder meetings and departmental executives meet with AMSA regularly.</li> <li>• We have established formal and informal mechanisms to engage with our regulated entities and other stakeholders to help improve the efficiency of our regulatory framework through channels such as topic specific email inboxes, monthly teleconferences, bi-annual face-to-face meetings and meetings with individual exporters at their request.</li> </ul>

## KPI 5 — We are transparent and accountable in the way we administer our regulation

**Objective:** We make decisions in a manner that is timely, consistent and supports predictable outcomes.

Performance Measures	Targets	Results
When we make decisions we provide reasons and our advice is timely and consistent.	Our approach to regulation is clearly defined in publicly available regulatory statements and compliance plans.	<b>Rating: Managed</b> <ul style="list-style-type: none"> <li>Our regulatory and compliance approaches are outlined on our website, including in our Compliance Statement for the Export of Livestock. We are also committed to reviewing how we present this information on our website in the next financial year.</li> <li>The department is currently developing a Regulatory Practice Framework, which will support a strengthened regulatory posture by outlining the department's approach to its regulatory responsibilities and providing principles to help guide regulatory staff in performing their duties.</li> </ul>
When we make decisions we provide reasons and our advice is timely and consistent.	Our advice to regulated entities explains the reasons for decisions and provides information about avenues for review or complaint (as provided for in relevant legislation).	<b>Rating: Managed</b> <ul style="list-style-type: none"> <li>We utilise a range of channels when advising exporters of administrative and regulatory actions and decisions, for example, by email, via written directions and/or by issuing show cause notices. The approach we use is proportionate to the issue or decision; the rationale for the decision is provided; and, where appropriate, we seek legal advice when preparing and issuing decisions. Information about how to seek review is provided in correspondence.</li> <li>The legislation allows regulated entities formal application for a reconsideration and review of decisions made. Further information is available on the department's website.</li> <li>We respond to matters in accordance with the relevant service standards outlined by the department's client service charter. The client service charter and standards are published on the department's website.</li> </ul>

**Objective:** Reports on regulator performance are published in required timeframes.

Performance Measures	Targets	Results
We publish an annual self-assessment of our performance by the required timeframes.	Our regulators publish performance information specific to their regulatory frameworks.	<b>Rating: Managed</b> <ul style="list-style-type: none"> <li>Our Regulator Performance Framework report provides a high level assessment of our performance as a regulator. The department's annual report also provides performance information on export related activities.</li> </ul>

**Objective:** Our assurance and integrity processes will ensure our compliance approaches are targeted to need.

Performance Measures	Targets	Results
Our regulatory actions are subject to internal assurance processes.	We verify the integrity and reliability of our compliance activities.	<b>Rating: Managed</b> <ul style="list-style-type: none"> <li>All staff across the department are required to undertake mandatory integrity training.</li> <li>The department is committed to ensuring its regulatory systems are effective and efficient. It continues to work with those participating in the trade to ensure they understand and comply with their regulatory obligations; and takes appropriate action when non-compliance is suspected or detected in order to provide assurance to the ongoing integrity of the live animal export regulatory system.</li> </ul>



## KPI 6 — We actively contribute to the continuous improvement of our regulatory frameworks

**Objective:** We establish cooperative and collaborative relationships with regulated entities and stakeholders to promote trust and improve the efficiency and effectiveness of our regulatory frameworks.

Performance Measures	Targets	Results
We take into account feedback from our regulated entities and performance information to improve operations of our regulatory frameworks.	We routinely consult with stakeholders on administration of regulation, and seek their advice on significant changes and explain our decisions (this target also applies for KPIs 2&5).	<b>Rating: Managed</b> <ul style="list-style-type: none"> <li>We actively consult with and provide updates to our stakeholders through channels such as the department's 'Have Your Say' website, monthly live animal export industry teleconference and bi-annual face-to-face meetings, and face-to-face meetings and teleconferences with individual exporters/industry stakeholders as required. We also utilise a range of other forums such as industry annual conferences and LIVEXchange to meet with exporters individually and collectively to discuss regulatory reforms.</li> <li>LEAWAG brings together representatives from industry, animal welfare organisations, academia and state and territory governments to discuss common matters of concern and allows us to seek advice and explain our decisions.</li> </ul>
We take into account feedback from our regulated entities and performance information to improve operations of our regulatory frameworks.	We have a program of review for our regulatory frameworks and operational arrangements are fit for purpose and appropriate.	<b>Rating: Sound</b> <ul style="list-style-type: none"> <li>We are currently mapping all regulatory processes to better understand regulatory risks, gaps and opportunities in the regulation and potential control points through the live animal exports supply chain. Findings of this work will help ongoing business improvement processes.</li> <li>In our response to the Moss Review, we also committed to reviewing the Australian Standards for the Export of Livestock every three years.</li> <li>We also work collaboratively across the department to ensure that operational activities meet legislative outcomes and remain fit for purpose.</li> </ul>

Performance Measures	Targets	Results
We take into account feedback from our regulated entities and performance information to improve operations of our regulatory frameworks.	We review our regulatory performance and identify areas for improvement in our systems and processes.	<p><b>Rating: Sound</b></p> <ul style="list-style-type: none"> <li>• We are currently mapping all regulatory processes to better understand regulatory risks, gaps and opportunities in the regulation and potential control points through the live animal exports supply chain. Findings of this work will help ongoing business improvement processes.</li> <li>• We also intend to implement a program of random, unannounced inspections of consignments as part of the overhaul of our assurance program. The approach will also examine all relevant assurance and audit requirements and activities (including Approved Arrangements, Registered Premises and inspections).</li> <li>• In March 2019, Mr Ross Carter commenced as Interim Inspector-General of Live Animal Exports. This role has been established to promote continual improvements in the regulatory practice, performance and culture of the department; provide an additional layer of accountability and assurance; and ensure our staff consider animal welfare when performing their functions and exercising their powers.</li> </ul>

## **CASE STUDY – Implementing recommendations from the Review of the regulatory capability of the Department of Agriculture and Water Resources in the regulation of live animal exports**

In October 2018, we published Mr Phillip Moss's *Review into the regulatory capability of the Department of Agriculture and Water Resources* in the regulation of live animal exports (the Moss Review).

The review found there was a need for us to improve our regulatory framework and practices—to prevent non-compliance, to respond to non-compliance in an effective way, and to deliver strong animal welfare outcomes to support a sustainable live animal trade.

We supported or supported in principle the 31 recommendations of the Moss Review and, as result, has focussed on:

- organising for a strong regulatory practice
- ensuring a transparent and well-engaged regulator
- delivering a regulator with the necessary skills and systems
- ensuring animal welfare is integral to our regulatory approach.

We have made good progress implementing recommendations. By 30 June 2019, 15 of the 31 recommendations had been either implemented in full or considered business as usual.

Key achievements in 2018–19 included:

- Appointing Mr Ross Carter as Interim Inspector-General of Live Animal Exports. This role has been established to promote continual improvements in the regulatory practice, performance and culture of the department; provide an additional layer of accountability and assurance; and ensure our staff consider animal welfare when performing their functions and exercising their powers.
- Making significant progress delivering science-, evidence- and best-practice based regulatory and animal welfare standards and outcomes, including:
  - completing the Review of the Australian Standards for the Export of Livestock (ASEL) sea voyages review in March and making good progress on the air journey review
  - publishing new northern summer exporter requirements for the export of sheep in March
  - publishing a review into the key factors impacting sheep export trade in May
  - utilising data from the Bureau of Meteorology, on-board wet bulb temperature monitoring devices and observations from our on-board Independent Observers to inform our policies.

- Appointing a Principal Regulatory Officer to help connect all parts of the regulatory chain to the wider practice regulatory practice in the department; and re-establishing the Animal Welfare Branch, which is responsible for ongoing development of ASEL, systems verification and broad stakeholder engagement.
- Delivering improved consultation channels, including re-establishing LEAWAG to provide a forum for strategic consultation between stakeholders and the department; improving engagement with state and territory regulators, and improving engagement with exporters and other industry stakeholders.
- Delivering significant reforms in the Live Animal Exports Division and more broadly to improve the department's regulatory culture. This has included developing a regulatory training framework with new induction processes and training in administrative law, defensible decision making and integrity.

We are continuing to deliver reforms in 2019–20, including releasing an updated compliance statement, finalising the new ASEL version 3, and continue to deliver activities to improve the regulation of the trade and the health and welfare of livestock.