



## CATTLE COUNCIL OF AUSTRALIA

8 June 2018

Mr Philip Moss  
Independent Reviewer  
Department of Agriculture and Water Resources  
GPO Box 858  
CANBERRA, ACT 2601

Via email: [lae.review@agriculture.gov.au](mailto:lae.review@agriculture.gov.au)

Dear Mr Moss,

### RE: REVIEW OF LIVE ANIMAL EXPORTS REGULATORY CAPABILITY AND CULTURE

Cattle Council of Australia (Cattle Council) thanks you for the opportunity to provide a submission into the Review of the Live Animal Exports Regulatory Capability and Culture.

Australia's livestock export trade is an economically significant alternative market to domestic processing, creating essential market diversity and competition for Australian cattle producers. Accordingly, Cattle Council continues to support the export of live cattle from Australia.

As the Peak Industry Council (PIC) representing beef producers, Cattle Council advocates for continuous improvement in welfare outcomes for cattle throughout the entire supply chain.

Cattle Council supports ongoing, direct engagement with the Department of Agriculture and Water Resources (DAWR) to improve supply chain transparency of the live export trade and strives to meet community expectations, and in partnership with industry participants, to safeguard the future sustainability of the trade.

Cattle Council regards the continued investment of producer levies into market access, research, development and adoption activities of significant importance to ensure the continued enhancement of the sector.

Cattle Council, again thanks you for the opportunity to contribute to the review of the regulator and is pleased to attached our initial recommendations. We look forward to ongoing consultation surrounding the review recommendations.

Kind Regards

Margo Andrae  
Chief Executive Officer



### **REVIEW PROCESS OF STANDARDS**

Cattle Council considered the review process presented for the Australia Standards for the Export of Livestock (ASEL) as well structured and thorough. The consultation conducted with industry before the commencement of the review was concise and ensured industry involvement. Importantly, the review process outlined for ASEL allowed for the continued revision of the standards beyond the initial review. The continuous review of standards is crucial to ensuring as an industry and regulator, the most recent scientific evidence is used to inform policy.

Cattle Council would make the observation that, political pressures, whilst sometimes unavoidable, continue to inhibit the strength of reviews. The reduction of timeframes or the extent of the content reviewed continues to diminish the capacity of the regulator to effectively mitigate risk within the live export sector.

**Recommendation:** *That reviews be conducted in a manner which allows for the continuous revision of standards.*

**Recommendation:** *That Industry be consulted and have an opportunity to provide feedback regarding the manner in which reviews be conducted prior to commencement and throughout implementation.*

### **REPORTING**

Cattle Council supports the publication of report details made to the DAWR. Increased transparency is key to ensuring that both the regulator and the live export sector reflect community sentiments. Cattle Council consider that the level of information publicly available is sufficient, however has concerns that reports the DAWR receive are not always a true representation of conditions on vessels and the livestock being transported on those vessels. It is for this reason that Cattle Council will be requesting through the ASEL Review, that video logs (short videos) be captured everyday and be provided to the DAWR. Cattle Council believes that the additional reporting requirements would assist the DAWR in determining the health and welfare of animals on board vessels. Cattle Council commits to working alongside the DAWR to determine the appropriate standards which will support the capturing of footage.

**Recommendation:** *Cattle Council supports an on-board video log for a prescribed period each day on all live export shipments. The video log is to be the responsibility of the person on board in charge of regulatory reports and compliance under ASEL.*

### **KNOWLEDGE AND SKILLS OF THE REGULATOR**

Given the nature of the live export sector, and the sometimes-adverse conditions in which crew members find themselves, Cattle Council regards the training of staff as imperative to the success of a voyage. In recognising the need for veterinary skills on board a vessel, which are provided by an AAV, Cattle Council fears that they are not always equipped with the necessary skills to adapt to life on a vessel. It is for this reason that Cattle Council suggest that all AAV's be required to undertake the stockpersons course administered by LiveCorp.

**Recommendation:** *That the Shipboard Stockpersons Accreditation Course be made mandatory for AAV's.*





## COMMUNICATION BETWEEN INDUSTRY AND THE REGULATOR

Communication between the regulator and industry continues to provide challenges. As previously mentioned, Cattle Council welcomed the manner in which the ASEL review was conducted and the communication plan which the regulator adopted. Cattle Council would hope to see the same level of communication adopted throughout all divisions of the regulator. In addition, crisis management plans should incorporate industry consultation, roles and responsibilities to ensure well-coordinated and factual industry responses.

**Recommendation:** *That the regulator increases industry engagement throughout the live export division.*

**Recommendation:** *That the regulator develops a crisis management plan which includes industry consultation.*

## RESOURCING AND FUNDING

The regulator continues to be disadvantaged by competing priorities of the Australian Government. Budget cuts continue to inhibit the regulators capacity to effectively resource the live exports division of the DAWR. This impacts their capacity to effectively oversee, export policy, licensing of livestock exporters and the inspection of health and welfare certificates of livestock, resulting in an increase in regulatory breaches. As long as the DAWR continues to regulate livestock exports, sufficient resources must be apportioned to ensure risks are mitigated within the sector.

**Recommendation:** *The appropriate apportionment of funds and resources are allocated to the regulator.*