

22 April 2014

Agricultural Competitiveness Taskforce
Department of the Prime Minister and Cabinet
PO Box 6500
CANBERRA ACT 2600

By email: agricultural.competitiveness@pmc.gov.au

Dear Sir, Madam

White Paper on Australia's Agricultural Competitiveness

Thank you for the opportunity to contribute to the public consultation seeking input into the development of the White Paper on Australia's Agricultural Competitiveness.

As more and more people become concerned about animal welfare, governments will need to treat animal welfare as a 'public good' and play a prominent role in assisting industry to deliver improved animal welfare standards.

It is disappointing that the Agricultural Competitiveness Issues Paper barely mentions animal welfare except as a "social" issue (p.13) to which farmers must respond. Community and consumer demand should be seen as one of the biggest drivers - and, hence, opportunities - to improve animal welfare.

Major retailers and indeed some sectors of the livestock industry have embarked on a range of initiatives to improve the welfare of farmed animals in this country. It is this community sentiment and the opportunity it provides for those who produce animals for food and fibre on which the White Paper should be focused.

A livestock industry that sees animal welfare as an opportunity to be embraced, and that invests in improving animal welfare standards, and fosters consumer trust through transparency, is an industry best placed to capitalise on the consumer trends occurring here in Australia and throughout the developed world.

Please don't hesitate to contact us should you require further information.

Regards



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RSPCA Australia submission

Agricultural Competitiveness White Paper Public Consultation

The RSPCA submission is based on an interest in the welfare of livestock farmed for food and fibre. Our comments relate to a number of the questions for consideration in the Agricultural Competitiveness Issues Paper and are presented in that order.

1. Ensuring food security in Australia and globally

What opportunities exist to expand agricultural production in Australia and how can we take advantage of them?

The expansion of agricultural production is a valid aim and provides an opportunity for livestock producers to embrace methods of production that take into account animal well-being in addition to productivity measures. Livestock production should not come at a cost to animal welfare. Increased intensification of animal agriculture and the breeding of animals for enhanced production characteristics, for example, have led to immeasurable suffering of animals in high-confinement systems with no ability to express their behavioural needs. Animal production systems of the future must be designed to provide 'quality of life' for the animals concerned - from birth through to slaughter - while at the same time meeting the needs of the producer and the expectations of the consumer.

2. Farmer decisions for improving farm gate returns

What tools, skills and advice do farmers need to effectively adapt and respond to the risks they face?

What approaches could be used to encourage improved drought preparedness?

During drought, what measures are most effective in supporting long term resilience?

Industry and government have an important role to play in raising awareness among livestock producers of the range of options available to them when it comes to planning and preparing for drought and how to come out the other end. Peak industry councils and state farming organisations, in particular, could take a more pro-active role in ensuring that such preparedness plans are in place and acted upon when the time comes. These bodies could also take a more active role in ensuring that where animals are suffering through mismanagement that the livestock producer is provided with practical assistance (e.g. through an extension officer) to ensure systems are in place to prevent a similar situation occurring in the future. The Livestock Biosecurity Network could also play a role in education and awareness raising about the importance of preparing for emergency situations.

A question that should be considered relates to drought assistance packages. It is acknowledged that droughts are more frequent and may last a number of years when they occur. A livestock producer in a drought-prone area who has prepared for drought by, for example, ensuring feed and a reliable water source is available to livestock would surely not appreciate on-going assistance being provided to a producer who has done no such thing and allows livestock to die. Assistance to such a producer could be seen as rewarding mismanagement rather than alleviating misfortune. Hence, on-going assistance could take into consideration the extent to which a livestock producer has developed and implemented a drought preparedness plan and acted on the plan in a manner that avoids animal suffering.

Improved drought preparedness could be achieved through early intervention by governments, recouping government costs related to seizure/disposal of animals, as well as infringement penalties for mismanagement resulting in livestock suffering or death.

When it comes to animal welfare more generally, the overall approach taken by the livestock industries should be more proactive and engaging with the Australian community. Openness and transparency of farming operations should be made a key objective to foster confidence, trust and understanding.

Examples of how this could be achieved include method of production labelling on pack (which allows those willing to pay more for higher welfare production to easily identify products from such systems), industry quality assurance schemes (which require production practices to exceed minimum legal requirements), closed circuit television cameras (allowing live animal handling areas to be closely monitored and problems to be addressed as soon as they occur), and farm visitation programs (to improve people's perceptions of farmers and increase their willingness to pay for higher welfare foods).

5. Enhancing agriculture's contribution to regional communities

How can the agriculture sector best contribute to growth in jobs and boost investment in regional communities, including indigenous communities?

A strong, resilient and future-focussed livestock sector that cares about animal welfare need not include the export of live animals for slaughter. The relatively small live export industry is one that comes with great reputational risk to the larger beef and sheepmeat export industries. The RSPCA's long-held view is that transitioning the live trade to an expanded meat trade will create more job opportunities in rural and regional Australia through the growth of the meat-processing sector. Contrary to industry claims that thousands of jobs within the trade will be lost, the reality is that the vast majority of these jobs would remain and even more would be created. In fact, the live export trade has actually resulted in a net decrease in jobs throughout regional Australia through its impact on the domestic processing sector.

With regard to ESCAS and live export reform generally, the RSPCA will be providing more detailed information to the Department of Agriculture and the Minister for Agriculture on this issue separately and no further comment will be made on the matter in this submission.

6. Improving the competitiveness of inputs to the supply chain

How can rural industries and governments better identify, prioritise and fund research, development and extension?

It is widely acknowledged that livestock industry research and development (R&D) is important to the long-term viability of the sector. Improving animal welfare must be a priority in industry research programs. Current research often involves collaboration between peak industry councils, universities, industry R&D corporations and Cooperative Research Centres (CRC). The RSPCA's involvement with the Pork CRC's Program 1 'Reduced confinement of sows and piglets' leads us to conclude that the CRC model is perhaps the most effective way for government and industry to fund research that is relevant to industry needs. In addition to the 'Essential participants' (industry and research bodies), the Pork CRC has a wide range of 'Other participants' including the RSPCA and a major retailer who have the opportunity to contribute to the research program ensuring stakeholder expectations are understood. It must be said that the success of the Pork CRC's research program, in addition to the quality of the research, is attributable to the significant funds that major pig-producing companies are willing to invest in order to achieve practical, on-farm improvements.

An essential aspect of industry and government-funded research is peer-review and publication of research results. The development of animal welfare policy, for example, must be informed by the relevant science however it is not acceptable that decisions should be made on the basis of unpublished or non-peer-reviewed reports.

Ongoing investment in research will ensure that livestock producers have access to best practice technologies that will improve productivity, their long-term viability and, importantly, animal welfare. In that context, the livestock sectors need to ensure their R&D programs reflect an awareness of emerging issues and a responsiveness to growing consumer expectations that may impact their industry.

7. Reducing ineffective regulations

How well do regulations affecting the industry meet their policy objectives?

ABARES, in its assessment of opportunities for regulatory reform lists the Australian Animal Welfare Strategy (AAWS) under the category “No unnecessary regulatory burden exists”. Yet, the Australian Government, in December 2013 abolished the AAWS Advisory Committee and its working groups (including the Livestock & Production Animals Working Group), effectively dismantling the framework and the process through which stakeholders engaged on a range of animal welfare issues and activities that allowed for animal welfare policy development in this country.

The Australian Government wants to enhance “consultation with the agriculture sector by establishing an industry advisory council that will meet with the Minister for Agriculture at least twice a year” (p.4 Agricultural Competitiveness Issues Paper). For animal welfare policy (and standards) to be effective, they must reflect community expectations, be firmly based on science and be practical for industry. This can only happen if stakeholders are consulted and a forum is provided whereby robust and constructive debate can occur. An advisory council solely representing industry interests will not achieve this.

Reducing red tape is a justifiable aim where it improves efficiency, but we need to ensure that processes are and remain in place that allow for efficient and effective implementation of policy. Without processes, stakeholders are left in limbo.

The Australian Government wants to improve “chemical registration by reforming agricultural and veterinary chemicals legislation.” (p.3 Agricultural Competitiveness Issues Paper). A good thing but a reform package should consider animal welfare impacts too.

The RSPCA has an interest in the registration of veterinary medicines and other products where their aim is to alleviate pain and suffering. It is certainly important to have a process in place that ensures that new products can be evaluated and will not have harmful effects on the animals concerned. However, the process (managed by the Australian Pesticides and Veterinary Medicines Authority (APVMA)) should not result in long delays in product registration or reluctance by (international) companies to embark on the registration process due to the requirements for clinical trials, etc. in Australia. It is not uncommon for a product to have been in use worldwide with proven efficacy and with no animal health/welfare impact and yet the APVMA requiring Australia-specific trials.

The APVMA guidelines outlining the requirements for product registration must be reviewed and, indeed, these guidelines should reflect current thinking about the use of animals in research and the need to integrate the principles of the 3Rs (replacement, refinement and reduction). In addition, the APVMA’s requirements for new product registration should not result in unnecessary animal suffering due to needless delays in the registration process. For example, there is currently a target-specific wild dog and fox bait awaiting APVMA approval that contains para-aminopropiophenone (PAPP) and which would offer a more humane method of pest control compared to the widely used poison 1080 which is indiscriminate in the species it affects and has no anti-dote.

8. Enhancing agricultural exports

How can industries and government respond to the key challenges and opportunities to increase or enhance exports?

The Agricultural Competitiveness Issues Paper (p.30) points out that “with rising populations in middle and higher income brackets, this also provides an opportunity for exports of food and fibre products that can be sold at price premiums due to quality, environmental standards and other desired characteristics—such as specialist flour or organic certification. Concurrently, increasingly wealthy consumers are becoming more discerning in their expectations of quality.”

It is clear that a consumer’s ethical values influence their purchasing decisions. Products with higher animal welfare attributes are gaining market share. The increasing retail market share of cage-free eggs, the growth in higher welfare chicken meat and pork - including those sold under the RSPCA Approved Farming Scheme - all reflect this.

Gearing Australia’s livestock production systems towards higher welfare production could provide a competitive edge in current export markets and offer Australian producers an opportunity to access new markets where consumer demand increasingly favours those higher welfare products. Achieving price premiums for Australian livestock products is key to the long-term viability of the industry.

SUBMISSION ENDS