



20 December 2019

Mr Henry Campbell  
Department of Agriculture  
GPO Box 858  
Canberra ACT 2601

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

Dear Mr Campbell,

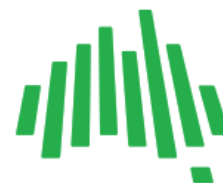
**RE: Independent Observer Deployment Policy – consultation paper**

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission on the Department of Agriculture's *Independent Observer Deployment Policy: Consultation Paper*.

The NFF was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain, including live export. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF supports a sustainable live export industry that is accountable and continues to deliver benefits to regional Australia and provides positive animal welfare outcomes in line with community expectations. The live export trade is critical to many Australian farmers and regional communities and makes a significant contribution to the broader Australian economy (\$2 billion in 2017-18). Australia is a leader in the global live export industry as the only country that demands welfare is monitored and protected through the whole supply chain.

The Department of Agriculture (the department) implemented the livestock exports independent observer (IO) program in April 2018, requiring an IO to conduct monitoring and reporting activities on live export voyages. The program was intended to provide additional assurance of the effectiveness of exporter arrangements in managing animal welfare and to increase transparency to industry, the public and government. While an IO model has merit to improve transparency of the industry and to build trust, the NFF has



become aware of industry concerns about the current program's efficiency, and its ability to deliver on its intention.

NFF member, the Australian Livestock Exporters' Council (ALEC) has provided a detailed submission in response to the department's consultation paper. The ALEC submission expresses support for the department's October 2019 decision to repeal the requirement for IOs to travel on low-risk short-haul voyages, and move to a risk-based approach to IO deployment. The NFF also welcomes this shift towards risk-based regulation, which is consistent with best regulatory practice. The ALEC submission outlines the need to improve the design, performance and outcomes of the IO program, ensuring it delivers on its intention. Key issues and areas for improvement are summarised as:

- The need to better incorporate consideration of risk in IO deployment policy.
- The policy proposals for vessels unable to accommodate IOs are overly prescriptive and lacking in practicality, and there appears to be a level of distrust from the department regarding exporters' advice on this matter.
- Alternative models for collecting required compliance information should be explored, including better utilising AAVs and Accredited Stock Persons, which would also assist to minimise duplication of monitoring and reporting activities.
- The lack of prescribed reporting timeframes for IOs is a concern, and has for example resulted in exporters being unaware of adverse findings until they are raised by the department when preparing for their next voyage – sometimes only days before intended departure.
- Longer-term deployment policy and regulatory decisions should draw on monitoring and reporting data and consider exporter performance, including improvements in voyage welfare and mortality outcomes since April 2018.
- The costs to exporters of the current IO program are excessive, and options to reduce those costs through alternative arrangements should be explored.

Further detail on each of these issues is provided in the ALEC submission. The NFF also encourages the department to consider ALEC's alternative proposal for an IO program shifting from government-employed and managed IO services to government approved third-party service providers. This would allow the government to focus on determining and enforcing standards and reporting requirements, without the responsibility of employing and managing an IO workforce.

The NFF supports the ALEC submission, recognising that as the peak industry body representing the Australian livestock export sector, ALEC provide direct knowledge and



experience that is essential to this consultation. We encourage the department to consider the suggestions made in the ALEC submission.

Should you require any further information in relation to this submission, please contact Adrienne Ryan, General Manager Rural Affairs, on 02 6269 5666 or [aryan@nff.org.au](mailto:aryan@nff.org.au).

Yours sincerely,

A handwritten signature in blue ink that reads "Tony Mahar". The signature is fluid and cursive, with a large initial 'T'.

**TONY MAHAR**  
Chief Executive Officer