

**National
Farmers
Federation**

Renewing the Australian Animal Welfare Strategy

June 2024



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

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 represents Australian agriculture on national and foreign policy issues including workplace relations, trade and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



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Executive Summary

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Department of Agriculture, Fisheries and Forestry (the Department) discussion paper on the renewed Australian Animal Welfare Strategy (AAWS, Strategy).

Animal welfare is fundamental to farmers. The NFF is committed to working with its members and with governments and others to continuously improve animal welfare outcomes and to ensure Australian farmers are recognised as global leaders.

The NFF is also committed to ongoing and transparent dialogue with the community about the management of animal welfare. Engagement with the community based on trust and transparency is a core tenet of the NFF's 2030 Roadmap for a \$100 billion agriculture sector.

All animals deserve to be treated with care and respect. Australian farmers care about their animals and are best placed to drive continuous improvement in welfare outcomes. Farmers also value the trust that the community places in them and know that community acceptance of the way they care for animals is essential to the agriculture industry's success.

For these reasons, it has been a key ask of the NFF's Animal Welfare Policy that governments should commit to working with industry and animal welfare organisations to develop a national strategy for production animal welfare, building on the lapsed iteration of the Australian Animal Welfare Strategy (AAWS).

Defining animal welfare

According to the World Organisation for Animal Health, animal welfare means 'the physical and mental state of an animal in relation to the conditions in which it lives and dies'. The NFF recognises animals as being able to feel and perceive the world around them, and considers that an animal is in a good state of welfare where it is healthy, well nourished, safe, comfortable and able to express normal patterns of behaviour, as supported by unbiased scientific evidence.

The NFF's Animal Welfare Policy is informed by the Five Domains Model, which looks to balance positive and negative effects to ensure livestock lead 'a good life' within the bounds and practicalities of production. Good animal welfare is supported by knowledge and skilled management. Please find the policy *attached*.

Expectations for renewing the Strategy

The NFF submission outlines our sector's expectations for the renewal of the AAWS, in terms of process, engagement and outcomes. It is imperative to acknowledge that industry's trust in the government's animal welfare agenda has been significantly compromised historically but particularly in light of recent policy decisions. Ensuring that parties' expectations are clear from the outset of this process will safeguard the successful delivery of the updated AAWS.

Our expectations for the renewal of the Strategy include:

1. Strategy objectives are underpinned by unbiased, current, evidence-based scientific advice and practical, industry experience;
2. Activist groups with a public agenda against production animals are excluded;
3. The Strategy has a clearly defined purpose and scope;
4. Transparency is paramount through the development process; and
5. Opportunities for continuous improvement are driven in collaboration with industry.

National Statement on Animal Welfare

The NFF's expectations in regard to the development of the AAWS extend to the development of the National Statement. The statement should be developed in collaboration with industry and ground-truthed by scientific evidence and practical experience. The statement must not directly or inadvertently give credibility to the loud voices of an extreme minority who are driving anti-production animal views.

Noting the current political agenda to phase-out the live export of sheep by sea, we strongly recommend that the government delays the release of the statement until the statement can genuinely signal a consistent and united animal welfare agenda between stakeholders.

Expectations for renewing the Strategy

1. Strategy objectives are underpinned by unbiased, current, evidence-based scientific advice and practical, industry experience

The NFF requires assurance that the AAWS will be underpinned by research, evidence and practical experience, rather than ideological considerations or political agendas. The discussion paper correctly identifies that the Strategy should seek to maintain Australia's commitment to modern, sustainable animal welfare practices informed by science and evidence.

The development of the Strategy comes at an extremely challenging and sensitive time for industry, alongside the government's declaration to phase-out live sheep exports by sea. This widely opposed policy continues to be justified on questionable 'community sentiment' data and despite substantial and evidence supported welfare gains over the past decade. As a result, industry is understandably apprehensive of the government's broader animal welfare agenda. It is difficult for the sector to believe that the government genuinely seeks to affirm 'Australia's commitment to modern, sustainable animal welfare practices informed by science and evidence' while they simultaneously rely on subjective, extreme ideological views as the basis to ban live sheep exports by sea. Committing to a science and evidence-based approach from the outset will mitigate industry scepticism of this process and assist to re-build trust between key stakeholders in the system.

An objective, evidence and science-based approach to the Strategy will provide meaningful insight into the complexities of animal welfare and effectively address

the root cause of welfare challenges. Holding stakeholders accountable to this approach will also provide a common and objective language which can be used to constructively discuss any contentious or sensitive issues. Ultimately, the successful development of the Strategy is contingent on robust conversations towards a common goal of sustainable and continuous animal welfare improvement. An objective, evidence and science-based approach will help mitigate the real or perceived risk of the process being derailed or unduly influenced by extreme ideology and ethics.

2. Activist groups with a public agenda against production animals are excluded

Animal activist groups should not have a role in developing Australia's Animal Welfare Strategy. While we acknowledge that the Australian Government has an obligation to run a public consultation process, the views of animal activist groups are fundamentally incompatible with the objectives underpinning the development of a national animal welfare system.

As the primary custodians of production animals' welfare, the agricultural sector is engaging in the development of the AAWS in good faith, with a well-established and genuine commitment to pursuing continuous improvement in animal welfare outcomes. Anti-livestock production views and agendas are not conducive to practical strategy outcomes underpinned by unbiased, current, evidence-based scientific advice and practical, industry experience.

The discussion paper states that "A renewed strategy provides an opportunity to consider animal welfare in the context of contemporary science and evidence and reflect on the needs and expectations of all stakeholders." We implore the government to define stakeholders to include those responsible for implementing the strategy (such as the agricultural industry and supply chain stakeholders), independent expert consultants, academics, and government, and only legitimate animal welfare groups who are using evidence-based approaches to advocate for best practice animal welfare outcomes.

We refer the Department to consider the submission of the Red Meat Advisory Council (RMAC) for more information on specific groups which have a public agenda against the use of production animals for food and fibre.

3. The Strategy has a clearly defined purpose and scope

Since the lapse of the previous AAWS, the agricultural sector has significantly changed. The production animal welfare policy landscape is complex, with several bodies of connected and overlapping work to ultimately improve animal welfare outcomes. This includes intergovernmental collaborations right through to many sectors capturing animal welfare improvements through industry-led sustainability frameworks.

In the current animal welfare regulatory and policy landscape, the NFF sees a need for the AAWS to adequately:

- Identify the specific need/role for a renewed AAWS, including any existing gaps to be resolved;
- Address how the Strategy will seek to inform and support existing industry-led sustainability or animal welfare frameworks;

- Identify the parallel need for the prosperity of agricultural industries, without which, improved production animal welfare cannot be adequately resourced; and
- Overcome the current lack of harmony between jurisdictions, despite the existing standards and guidelines being agreed to ten years ago.

More broadly, the industry sees that the AAWS may contribute to the animal welfare space through ensuring:

- Industry and government stakeholders commit to continuously improve animal welfare outcomes and to ensure Australian farmers continue to be recognised as global leaders;
- Reinvigorated and tangible commitment from governments to overcome the lack of harmony between jurisdictions and streamline welfare standards;
- Industry and government commitment to the AAWS and implementation protects against the future shutdown of production animal industries; and
- Objectives of the AAWS reflect and support those enshrined in industry-led sustainability frameworks.

Vision

Building on the ‘mission’ of the previous AAWS, the NFF would like to see the Strategy’s vision statement recognise the need to deliver sustainable, science-based improvements in the welfare of all animals.

Proposed work streams

The NFF supports that the proposed work streams cover the right priority areas for the Strategy.

Challenges and opportunities

The NFF agrees with the challenges and opportunities listed in the discussion paper. These challenges and opportunities reinforce the need to consider the role and scope of the AAWS in the current policy environment, noting that many production animal industries are already responding to these challenges and opportunities in a number of ways. As an example, overseas trading partners’ interest in Australia’s sustainability credentials, inclusive of Australia’s animal welfare standards and systems, was the key driver for the development of industry sustainability frameworks.

As discussed above in the context of the policy to phase-out live sheep exports by sea, the AAWS will also have to contemplate how to protect the future of animal industries from ad hoc and adverse government intervention. This is both a challenge and opportunity.

4. Transparency is paramount through the development process

Industry’s trust in decision-makers has been significantly compromised. Many industry organisations are sceptical of government’s intentions in regard to this Strategy and its purpose. Inevitably, industry will question whether parties are approaching the co-design and development process in good faith to achieve a mutually beneficial outcome.

Complete transparency between government and industry is required to ensure the successful development of a fit-for-purpose Strategy, endorsed by all stakeholders. Transparency and consistent communication throughout the public consultation process, development of objectives and selection of priorities will help to re-build the trust between stakeholders and ensure industry can support the Strategy and its implementation in the future.

5. Opportunities for continuous improvement are driven in collaboration with industry

The AAWS must recognise that the agricultural sector is largely responsible for the implementation of the Strategy's objectives in regard to production animals. Opportunities for continuous improvement must be driven in collaboration with industry.

National Statement on Animal Welfare

We acknowledge the intent of the National Statement on Animal Welfare to formally commit all governments to pursuing joint objectives towards animal welfare improvements.

The NFF's expectations in regard to the development of the AAWS extend to the development of the National Statement. The statement should be developed in collaboration with industry and ground-truthed by scientific evidence and practical experience. The statement must not directly or inadvertently give credibility to the loud voices of an extreme minority who seek to drive anti-production animal views.

As stated above, industry trust in the government's animal welfare agenda has been significantly compromised by the policy to phase-out of live sheep exports. It will be incredibly difficult for industry to support a statement that signals alignment between the government and industry on animal welfare in the current political climate.

We strongly recommend the government considers delaying the release of the statement, until such time as it can genuinely demonstrate a consistent and united agenda and be more freely endorsed by industry.

Other priorities

Setting and revising animal welfare standards

The NFF supports the Australian Animal Welfare Standards and Guidelines for setting minimum welfare standards in Australian agriculture. The standards and guidelines were developed jointly by industry and government to harmonise and streamline livestock welfare regulation in Australia, resulting in welfare improvements that are grounded in science and practical for industry. The agreed standards are intended to be legislated by all state and territory governments, with the guidelines serving the development of industry-based and/or individual's assurance programs.

It is a policy priority of the NFF that the Australian and state and territory governments must commit to resourcing the ongoing development and periodic

revision of the Australian Animal Welfare Standards and Guidelines, and in conjunction with industry, to ensuring that the standards and guidelines continue to be informed by unbiased, up to date scientific advice and practical, evidence-based industry experience.

Industry representative bodies have an important role to play not only in the development of the standards and guidelines, but also in advocating for and promoting their uptake and revision as required. Industry-led assurance programs provide a highly effective market driver for the adoption of standards of welfare above those that are legally required. Regulation of minimum welfare standards and industry-led programs driving enhanced welfare outcomes also underpin market access and enhance Australia's international reputation.

Engaging with the community and benchmarking

Community expectations are continually evolving, and the community – and our trading partners – increasingly have an interest in what happens on farm and through the supply chain. It is the responsibility of industry to engage with the Australian community and to develop ways of demonstrating its integrity. This should be backed by a practical, unbiased, science-based and consultative system for setting national minimum welfare standards, and appropriately resourced and skilled regulatory enforcement at a state level. Industry-led initiatives like the sustainability frameworks are already supporting industry to communicate animal welfare credentials and aspirations to the community, and to drive on-farm practice improvements informed by unbiased science. These initiatives should be supported into the future.

Research, development, extension and adoption

Industry has invested millions of levy dollars into research, development, extension and adoption (RDE&A) to improve animal welfare outcomes. It is vital that these industry-driven investments and government cocontributions continue into the future. Industry plays a leading role in guiding expenditure on RDE&A, to ensure producers and supply chain operators have access to the latest animal welfare information and tools that can be applied practically. The R&D effort must be able to be responsive to industry needs and market signals, and extension and adoption should be prioritised.

Conclusion

The NFF thanks the Department for the opportunity to make a submission on the discussion paper on the renewed AAWS. The policy contact for this matter ■■■■■ via e-mail ■■■■■.

Regards,

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