AUSTRALIAN LIVESTOCK EXPORTERS COUNCIL

10 June 2021

Dr Melissa McEwen
Department of Agriculture, Water and the Environment
GPO Box 858
Canberra ACT 2601

By email: CostRecovery@agriculture.gov.au

Dear Dr McEwen

Re: 2021-22 Cost Recovery Implementation Statement – Live Animal Export

The Australian Livestock Exporters' Council (ALEC) is a member-based, peak industry body representing Australia's livestock export sector which contributes over $1 billion in export earnings annually while employing 13,000 mainly regional Australians. ALEC provides strategic direction to the industry, sets industry policy and represents Australia's livestock export trade in Australia and internationally.

ALEC members account for more than 96 per cent of Australia's annual livestock exports, by volume and value. ALEC's membership also extends to supply chain participants including registered premise operators, ship owners, feed suppliers and other service providers to the trade. ALEC therefore appreciates the opportunity to provide comment on the 2021-22 Cost Recovery Implementation Statement for live animal exports (CRIS) released for consultation by the Department of Agriculture, Water and the Environment (DAWE).

The COVID-19 pandemic has shown that the livestock export industry is one of, if not the most resilient industries in the country. The industry has continued to operate near unfettered through this period and proven to be the essential and robust industry that it is. All without government assistance or stimulus. While ALEC is not opposed to the recovery of regulatory costs, but it is reasonable to expect that the regulatory services delivered are as efficient as possible and any increase to these costs is fair and proportionate. ALEC is therefore shocked and dismayed by the dramatic scale of increase to cost recovery arrangements detailed in the CRIS.

Impact on international competitiveness

The increase in regulatory costs, as proposed in the CRIS, will have a detrimental effect on competition in the livestock export industry. This is due to few companies, if any, being able to absorb the proposed additional regulatory costs. Ultimately, these costs are akin to the Australian Government applying a 'non-tariff barrier' on the export of Australian livestock. It is anti-competitive, particularly for an export focused nation, and the cost will be disbursed along the supply chain, impacting Australia's international competitiveness, and the price able to be paid to Australian producers.

In the current COVID-19 period, certainty of trade and market access security are critical for Australia's economic recovery. Our key trading partners also have the added pressure of food security on top of their own economic recovery of which the import of livestock is integral. Indonesia and Vietnam are key trading partners in Australia's national interest and their strategic importance will continue to increase.

Indonesia is Australia's most significant strategic trading partner with live cattle exports now Australia's largest export commodity to Indonesia. According to ABARES, by 2050 Indonesia is projected to be the world's fourth largest economy, with its per person consumption predicted to be greater than China for key commodities such as cereals and beef. Dramatically increased regulatory costs could not come at a worse time, with current high cattle prices and increased competition from Indian buffalo meat and Brazilian cattle putting significant commercial strain on Indonesian importers of Australian cattle to the detriment of Australian producers. Why would DAWE do this when animal welfare results have been excellent over the past five years?

Similarly, Vietnam is of key diplomatic and strategic importance as identified by Prime Minister Scott Morrison MP. Live cattle exports to Vietnam were Australia's largest agricultural export to Vietnam in 2019 and third largest overall. 2020 saw 40 per cent year on year growth to Vietnam for live cattle. Brazil is actively looking to ship live cattle to Vietnam and increasing regulatory costs will enhance their competitiveness to the disadvantage of Australian producers.

Our markets for Australian live sheep in the Middle East remain integral to the success of Western Australian sheep producers. Continued government regulatory imposts and costs are eroding the capacity of exporters to supply these markets economically and competitively. Old and new markets for sheep are being affected and our customers are being forced to seek supply from alternative destinations such as South Africa and Romania, which do not have equivalent animal welfare safeguards. Excessive regulatory imposts also risk impacting complimentary exports of processed sheep meat to the same markets. The sustainability of the WA sheep industry is now at further risk.

Existing cost recovery arrangements inadequate

Industry recognises that the cost recovery arrangement implemented on 1 December 2015, following a CRIS process, was inadequate and needed reviewing to ensure ongoing financial sustainability and to reflect the regulatory needs of the sector. However, DAWE's implementation of regulatory reform measures in response to recommendations from numerous reviews, including the Moss Review, have significantly increased costs. While additional regulatory rigor was necessary to satisfy community concern, any increase to fees and levies must be accompanied by robust justification and where possible, offset by regulatory efficiencies to be considered appropriate, reasonable and fair.

Industry accepts the need for regulatory oversight and the associated costs, on the proviso that regulatory activities are outcomes focused, streamlined and efficient. Any proposed change to cost recovery arrangements must include efficiency improvements and be consistent with Australian Government Cost Recovery Best Practice Guidelines. While the CRIS promotes projects that are expected to deliver regulatory cost efficiencies in forward years, the associated cost savings have not been quantified nor has a date for delivery been set. This leaves a lot to be taken on face value, at a time when Industry's trust in the regulator is at a substantial low point.

Lack of transparency

The recent unfortunate and ill-informed debate on the per head cost of regulation could have easily been avoided had there been even a small attempt at meaningful engagement and consultation with industry when the 2020/21 CRIS was released earlier in the year. While Minister Littleproud's clarification on likely costs at the Charters Towers forum on 19 May 2021 was appreciated, committing to a $4 and $5 a head for cattle exported to Indonesia and Vietnam respectively in FY2021/22. Clarity on how this figure was calculated was at the time unavailable to industry for some reason. This is despite consultation on the CRIS having begun the week prior. In fact, this information was only presented to industry on 21 May 2021 and released publicly finally on 4 June – four business days before consultation on the CRIS closed. ALEC contends that this was neither timely nor transparent, particularly when DAWE stated that the figures would be presented in a "open book" process.

This information was also requested by Senator the Hon. Bridget McKenzie at Senate Estimates on 26 May 2021, with DAWE unable to answer and having to take the question on notice.

This lack of transparency should be reason enough to delay the implementation of the CRIS to allow industry and the broader live export supply chain to be adequately consulted, using the same data provided by DAWE to the Minister.

Insufficient detail and transparency

Many of the tables contained in the CRIS do not contain sufficient detail for an accurate assessment (open book) of the service and whether it is warranted. Table 2, for example, splits the cost base into Charges and Fee for Service. Where "Charge" = Program Management and administration/assurance/incident management costs of $15,268,133 (67% of costs).

Activities listed as a 'Charge' appear to be predominately administrative overheads. However, there is no segregation of cost for these activities, which allows separation of assurance costs. This information would have and should be available if transparency (open book) were truly a driver for this consultation process.

Fee for service costs on the other hand appear to be the operational cost of providing assessment of applications and export processing and certification. As these are generally time based, they are not in dispute and are transparent costs of export.

Poor justification

The CRIS seeks to justify the cost base increase as a response to the Awassi incident and the subsequent implementation of the Moss review recommendations (Section 4.2). Such a regulatory shift and resultant cost base increase following the single event is an unjust imposition, particularly when this event is and was completely irrelevant to cattle exports, which make up over 80 per cent of export trade. Regulation in this circumstance far outweighs any perceived risk and therefore does not come close to justifying the cost. It should be proportionate.

Implementation of the Moss review recommendations, leading to the substantial staffing expansion of the regulator, were not the reason for the improved animal welfare outcomes observed in sheep exports in the last 3 years. In fact, these outcomes have been delivered by adoption of reduced stocking densities and an industry-initiated moratorium on sheep exports by sea to the Middle East during the northern hemisphere summer which have come at significant cost to the industry and its sustainability.

In seeking to address these same issues following the Awassi incident, DAWE grew exponentially and now faces the issue where it must justify its existence by ever increasing documentation, continuous review of the standards and the undertaking of research, development and analysis, which we submit is outside the remit and area of expertise of the regulator. This particular concern with the Animal Welfare Branch is covered in more detail later in this submission.

The sheer increase in size of the regulator and hence the cost base cannot be linked to animal welfare outcomes, as these are primarily linked to the two changes detailed above. The introduction of

Independent Observers (IOs) delivered no insights into the operation of onboard management or improved outcomes that could not have been delivered by Accredited Stockman and Australian Government Accredited Veterinarians (AAVs), as evidenced since the withdrawal of IOs due to COVID restrictions. When IOs were withdrawn, industry continued to monitor animal welfare through accredited stockman and AAVs and there was no measurable change in outcomes. This was accepted by DAWE when questioned in Senate Estimates 23 March 2021. This is further discussed later in this submission.

Notwithstanding, regulatory costs have increased from $8.529m in FY2017/18 to the $22.435m proposed in the CRIS for FY2021/22 when export performance is and was already excellent. Particularly for cattle exports as shown below:

- From 2015, over 3 million head of cattle have been exported to Indonesia achieving a delivery rate of 99.95% (0.05% mortalities). This equates to the industry losing 5 head in every 10,000 head exported).
- From 2015, over 1.1m head of cattle have been exported to Vietnam achieving a delivery rate of 99.83% (0.17% mortalities). This equates to losing 17 head in every 10,000 head exported.
- From mid-2004 and the end of 2017, 675,000 of primarily young Bos taurus heifers have been exported to China, achieving a delivery rate of 99.88% (0.12% mortalities). This equates to losing 12 head in every 10,000 head exported.
- Which are all much better than annualised performance on-farm and in domestic feedlots.

This is even more compelling when considering the long-term decline in the rate of mortality for sheep during live export. Mortality rates have declined from around 2.5% in the mid 1990's, to less than 1.0% in 2011 and 0.53% in 2018. Sheep export performance to the Middle East has significantly improved with an average delivery rate of 99.79% (0.21% mortalities) achieved in 2019, which was bettered by performance in 2020/21.

This kind of performance leads to questioning at what point will performance of livestock exports be considered satisfactory by DAWE. ALEC contends that since 2018 livestock export performance has exceeded regulatory and community expectations, particularly when compared to on-farm and feedlot performance. The current burdensome and costly requirements need to now be reassessed, with efficiencies and associated staffing reductions implemented, to reset the regulator to one that is efficient and effective.

Industry exposure to increasing regulatory costs

As a sector, the livestock export industry is one of the few in agriculture that is 100 percent exposed to the export market, and therefore 100 percent exposed to its regulation. Regulation that already has the highest regulatory cost structure of the over 100 nations involved in livestock export. No other nation places prescriptive and process orientated regulatory requirements on every aspect of the livestock export supply chain. In part, this reflects the government and industry commitment to place animal welfare as a critical component of business, but a substantial proportion of regulatory costs are due to inefficient service delivery and structural problems within regulatory agency business models.

Regulatory burden has a significant impact on the commerciality of parts of the sector, particularly considering that the industry runs on incredibly tight margins and exporters bear considerable financial risk with each shipment. Consequently, poor, unfair and unnecessary regulatory outcomes only heighten that financial risk which may be an inhibitor to trade.

It is imperative that DAWE's regulatory efficiency and effectiveness continues to be reviewed and improved. ALEC notes that the Federal Government's 'Busting Congestion for Agricultural Exporters' package, announced in October 2020 as part of the Federal Budget, is expected to realise $21.4 million in efficiencies through to 2023- 24 from regulatory reforms.

Mounting regulatory burden that does not and will not deliver discernible improvements to animal welfare, fails to recognise the critical importance of the industry to the broader livestock production sector. An industry valued at $1.8 billion in 2018-19, representing approximately 10% of all red meat export receipts. Changing regulations that add millions of dollars of costs to the industry, significantly reducing the price able to be paid to Australian producers for their livestock, should only be considered where there is convincing demonstratable benefit.

Industry has long argued for intervention on cost recovery and service delivery by a third-party agency such as the Productivity Commission or private sector accounting/finance firms. This would better enable a more independent detailed structural review of the arrangements to design a system that better aligns regulatory cost structures to business. Unfortunately, the current CRIS arrangement 'taints' DAWE with the complaint of 'marking its own homework'.

Comparisons with other cost recovered sectors

Program and Administration /Assurance /Incident Management expenses at 66.8% of total costs compared to 22.74 % in the meat Industry bears further scrutiny. Given the size disparity between the livestock export industry and that of the meat processing industry, efficiencies of scale would be expected to result in a lower percentage of overheads for the meat processing industry. However, the magnitude of difference suggests management of the Live Export Division requires scrutiny, as overheads at this level threaten the viability of a comparatively small export industry and therefore must be justified. If the inclusion of non-livestock exports has any bearing on the calculation of cost of overheads, then providing them separately would at least enable some level of transparency. Bundling them together provides no transparency at all.

How regulatory costs can be reduced

1. Systems and processes

To reduce the cost of regulation, a reduction in the regulators staffing levels in necessary. To reduce staffing levels while maintaining high levels of regulatory oversight and animal welfare assurance, the implementation of efficient and effective systems and processors is necessary.

The systems and processes used internally by DAWE are, however, predominately paper-based and archaic, which lends itself to being inefficient, slow and backwards-looking. This may be due to a lack of investment by DAWE into information technology solutions. Maintaining contemporary systems and processes is DAWE's responsibility and appropriated funding is therefore required to rectify the situation. The Federal Government's 'Busting Congestion for Agricultural Exporters' package should assist in the development and introduction of much needed technical solutions.

Enormous amounts of data are collected on live export voyages that only received minimal use – because it is of minimal or no use. A benefit cost case should be made by DAWE before requiring any future additional data to be collected. Notwithstanding, if a benefit cost case can be made for the collection of some additional data, the data should be collected via the most efficient mechanisms available. The livestock export industry is firmly of the view that the Tracking Animal Certification for Export (TRACE) system lacks intuition and is clunky to use.

With the move towards using animal welfare-based measures for assessing performance of the live export industry, which inevitably involves greater levels of data collection, easier methods of data input and greater standardisation of data and better storage / access mechanisms are required. LiveCorp is currently in the process of streamlining the entry, storage and accessibility of live export data. The system being developed by LiveCorp, known as LIVEX-Collect, is to streamline the entry, storage and accessibility of live export data. Such a system would best be used by all persons responsible for monitoring and reporting during livestock export voyages, industry as well as DAWE.

2. Animal Welfare Branch

The Animal Welfare Branch (AWB) was re-established in October 2018 in response to Recommendation 14 of the Moss Review. The AWB was not cost recovered from 2019 to 2021. The CRIS now seeks to recover the costs of this branch, substantially increasing the cost to industry. However, there is no reasonable justification put forward by DAWE for this 'about-face'. ALEC questions whether this conforms with the Australian Government Cost Recovery Guidelines (RMG 304), which states: 'It is usually inappropriate to cost recover some government activities, such as general policy development…'

AWB costs have grown to $3.6M in FY2021/22 since being established in FY2019/20. The AWB does not perform a regulatory function. Its re-establishment was to satisfy 'community concern', and as such, the community should pay for it. Nowhere in Recommendation 14 of the Moss Review is there a reference dictating the size and staffing level of the AWB. The AWB should not be cost recovered as now proposed in the CRIS, regardless of whether it is identified as a 'policy setting' or 'standard setting' function. If, however the Australian Government Cost Recovery Guidelines are to be ignored, no reason is given for why it is now to be cost recovered, and cost recovery of the AWB proceeds, then a more adequate and reasonable staffing level needs to be implemented. ALEC submits that it would be better to utilise the industry's Research and Development Corporation (RDC), LiveCorp, who are experts in live export animal welfare and should be funded to do this work by DAWE.

The scientific and statistical assessment being undertaken by the AWB should be contracted to competent entities, such as RDCs. This has the added benefit of more efficient and effective use of exporter levies. Exporters already pay a statutory levy for research and development in addition to the fees and charges associated with exporting livestock. This means exporters will end up paying for research by an RDC through a statutory levy and again by the Animal Welfare Branch through fees and charges, and only one of those options can receive matched funding from government. It is therefore not unreasonable to describe the Animal Welfare Branch undertaking such assessments as double dipping.

The recent review into temperature stress in *Bos taurus* cattle from southern Australia during long haul export by sea is yet another example of the AWB's willingness to undertake scientific and statistical assessment that would be better undertaken by entities that have the requisite skills and experience, namely RDCs. A simple request to LiveCorp identifying concerns and requesting detailed analysis would have provided DAWE with the knowledge necessary to inform regulatory considerations. These concerns are compounded by the Review being instigated in response to 'concerns' raised by the RSPCA in a letter to Minister Littleproud[1].

[1] https://www.agriculture.gov.au/sites/default/files/documents/lex-20605.pdf

It is essential that regulatory decisions are practical and guided by robust research and evidence undertaken and analysed by recognised RDCs. This is extremely pertinent now as the global economy battles the impact of COVID-19, and even more so for our trading partners where these regulatory decisions have a real and tangible impact on their food security.

The AWB assessments are negatively impacted by the inability, and unwillingness in some circumstances, to understand the impracticality of its outcomes and decisions (they are not experts in these matters, like the RDCs), and therefore negatively impacting the viability and sustainability of the industry it regulates. The AWB should have been acutely aware, given the ongoing trade sensitivities, that China is Australia's largest market for Bos taurus cattle, primarily dairy heifers from our southern ports. It was therefore very disappointing that the first published iteration of the recent review singled out China directly, posing a significant potential risk to a critically important trade for our dairy producers. A simple change to the review title, and a slightly broader scope, papers over what is a substantial disconnect between the AWB and the real-world ramifications of their decisions. A disconnect that would not have existed had LiveCorp been tasked with the review.

3. Approved arrangements

Approved Arrangements for livestock exports were introduced following a Regulatory Impact Statement process in 2015. The intent was to move from the existing prescriptive, consignment by consignment approval system to a more simplified livestock export certification process that reduced government intervention in individual export consignments, maintaining the integrity of the trade and reducing costs. In addition to livestock exports, approved arrangements have been successfully implemented in agricultural export commodities such as meat, dairy, egg and fish.

Approved Arrangements achieve greater efficiency and reduce costs for both government and industry by reducing duplication, as well as placing more responsibility and accountability on exporters to meet the requirements for livestock exports. The intention of Approved Arrangements was to allow the focus of DAWE's role to shift to one of risk management, informed by exporter performance, audit and verification. Approved Arrangements also allow DAWE's officers to step away from the hands-on management of each consignment to a role assessing an exporter's business operations to compliantly export livestock.

Approved Arrangements were framed as a quality assurance framework that would encourage the identification and rectification of issues proactively (i.e. demonstrating an effective assurance system). This has been lost, and that the identification of a problem is likely to result in punitive action and be viewed poorly against an exporter, rather than positively against the effectiveness of their system. The following are issues with the administration of Approved Arrangements scheme considered by exporters as undermining the regulatory approach:

- Disconnect in expectations between DAWE and exporters on outcomes of Approved Arrangements.
- Re-introduction of industry level application of compliance responses.
    - A compliance matter with one exporter is resulting in compliance action being applied to all exporters (regardless of performance). For an industry with such diversity in business structures and operations such a blanket approach is unfair and inappropriate.
- Re-introduction of consignment-based regulation, and loss of systems-based regulation.
    - DAWE has reverted to a more time consuming and onerous model that is inconsistent with the regulation of other agricultural commodities.
- The regulator is looking for any issue, rather than focusing on the outcomes.

    - The regulator has reverted to a regulatory approach focused on the micro-management of the consignment approval process, rather than regulating at the systems level as Approved Arrangements is intended to support. This has degraded to a level where conflicting and contradictory directions are being provided to exporters by different regulatory officers.
- Lack of clarity about powers and responsibilities between the central office and the regional offices.
- Poor communication and rapport between the regulator and exporters.
    - The level of communication between the regulator and exporters has declined, as has the regulators practical understanding of the industry. This is likely associated with the substantial changeover in staff from those that were present when Approved Arrangements were introduced.
- Policies implemented without review date or sunset clauses.

A recent consultative approach undertaken by DAWE delivered an agreed, transparent framework for rejection criteria for livestock prior to export. This involved collaborating with key subject matter experts in Australian AAVs and Australian Government Registered Veterinary Officers (RVOs) and is a good template for improving transparency, consistency and efficiency of DAWE regulatory operations. DAWE have also recently initiated a review of Approved Arrangements, which we warmly welcomed. It is critical that the recommendations from this process are considered and implemented urgently.

4. Independent observers

DAWE introduced and now administers the IO program for livestock export voyages by sea. From April 2018, IO's have been placed on voyages to provide additional assurance of the effectiveness of exporter arrangements in managing animal welfare. IO's are, however, a significant financial impost which ultimately puts at risk the viability of livestock exports. For this financial impost to be justifiable, an IO should provide a service that is unique compared to other personnel onboard and add significant value.

In partial recognition of this, DAWE has implemented a risk-based approach to the deployment of IO's on short-haul voyages. Consequently, the COVID-19 pandemic required DAWE to cease deployment of IO's entirely, irrespective of whether it is a short-haul or long-haul voyage. This has enabled the implementation of alternative options that achieve equivalent assurance of the effectiveness of exporter arrangements in managing animal welfare, at a lower cost. The recommencement of the IO program in its previous format is therefore not warranted and no longer required.

5. Duplication of monitoring and reporting requirements

Animal welfare is the livestock export industry's primary concern and efficient and effective monitoring and reporting ensure appropriate animal welfare standards are being upheld during voyages. However, ALEC remains concerned with the duplication of monitoring and reporting activities being undertaken onboard export vessels.

Prior to COVID, on voyages of 10 days or more and unless otherwise specified by DAWE, there is an IO, an AAV and an Accredited Stockperson required onboard export vessels, all required to monitor and report similar observations. This duplicated monitoring and reporting results in an excess of paperwork that is unlikely to enable efficient nor cost-effective regulatory practices.

This leads to questioning whether the duplicated monitoring and reporting requirements demanded by the regulator is even used. The lengthy delays in the publication of IO reports leads to the conclusion that DAWE is incapable of managing, assessing and using the data provided by the IO alone in making regulatory decisions. It is therefore likely that the information carefully collated and submitted by the AAV and the Accredited Stockperson is at best neglected.

If the Accredited Stockperson and the AAV already collect the required data, the need for an IO to collect similar at an excessive cost must also be questioned, or at least justified. Of the three, IO's are the least qualified to judge onboard welfare and the most expensive. The efficiency and effectiveness of the Accredited Stockperson and AAV system has been demonstrated during COVID. Unlike DAWE, industry has not put the existing animal welfare monitoring and reporting systems on hold (apart from the IOs).

An analysis of IO reports during their time of operation demonstrates few benefits, other than the independence and transparency sought by the Minister, with little or no resulting welfare improvements, as well as no major shortcomings revealed. The superior option is better utilisation of AAVs and Accredited Stockpersons, with increased oversight and control by DAWE, using existing State Veterinary Registration and Livecorp Stockman Accreditation as the regulatory tool to manage performance. Notwithstanding, improving the use of and investing in technology to streamline onboard regulatory reporting and monitoring requirements that is currently duplicated, costly and inefficient is necessary.

Roundtable meetings between DAWE, ALEC and LiveCorp have been welcomed. They have considered these concerns and the resulting project work needs to be progressed quickly, particularly the digitisation of the live export processes that will hopefully bring about much-needed efficiencies to offset the expanded cost of the CRIS.

6. Unsolicited submissions

The cost associated with assessing, consulting, deliberating and responding to unsolicited submissions by animal activist groups, seeking to delay or stop legitimate export of Australian livestock, must be reviewed. DAWE has had to deal with numerous and sizable submissions such as these for sheep exports to the Middle East in recent years, for no benefit or use to the Australian Government, economy, the community or our trading partners.

It is critical that the cost of anticipated future unsolicited submissions is not included when forecasting future DAWE overheads, which would ultimately impact livestock export regulatory costs. Incorporation of these anticipated costs within DAWE overheads would result in the recovery of these costs through exporter fee and charges by stealth, which would be unfair, unwarranted and strongly opposed. The livestock export industry therefore seeks assurance and confirmation that livestock exporters will not be liable for costs of unsolicited, frivolous and vexatious submissions by animal welfare activist organisations.

In fact, on the Government's own cost recovery basis these organisations should be charged upfront for the cost that they are causing both industry and DAWE.

7. Non-compliance investigatory framework

DAWE's non-compliance investigatory framework is extremely cumbersome, manually intensive and therefore cost prohibitive. An overhaul of associated systems and processes is necessary to drive efficiency and is therefore urgently required. Again, the Federal Government's 'Busting Congestion for

Agricultural Exporters' package should assist in the development and introduction of much needed technical solutions.

8. Benchmarking against other regulators

Zero risk is an unattainable goal, in all animal production supply chain systems, and only really sought after by those that would prefer to see the livestock export industry phased out. All regulators need to incorporate risk into their regulatory decisions and nearly all do. ALEC recommends that DAWE liaise with other regulatory bodies, such as the Australian Pesticides and Veterinary Medicines Authority (APVMA), to better understand the concept of risk in a regulatory environment and how to use it to incentivise good regulatory behaviour.

Performance benchmarking is also necessary to ensure appropriate time allocation and associated costs. The implementation of performance benchmarks should enable effective assessment and comparison of regulatory performance and trends.

9. Staffing

Touched on earlier in the submission but the level of staffing and cost needs to be highlighted.
We have never ever been able to get any true visibility on this and I recall previous financial detail by DAWE in 2020 having shown staff costs up by 12% and organisational charts in 2019 as an example having 41 staff and so an average staff package of $341,000??
The fact that the number of live exporters is shrinking the DAWE should be called to account on how many staff is actually required to manage 19 active exporters of which 6 probably do 80% and more of the business.

Thank you for the opportunity to provide comment on the CRIS. Please do not hesitate to contact me at ceo@livexcouncil.com.au or on 0400 980 452 should you wish to discuss further.

Yours sincerely

Mark Harvey-Sutton
Chief Executive Officer
Australian Livestock Exporters' Council