



6 February 2020

Mr Andrew Henderson
Chair, SAFEMEAT Advisory Group
C/- SAFEMEAT Secretariat
GPO Box 858
Canberra ACT 2601

By email: safemeat@agriculture.gov.au

Dear Andrew

Re: National Biosecurity Committee Traceability Reform

Thank you for your letter of 16 December 2019 requesting in-principle endorsement of the draft recommendations that seek to deliver enhanced biosecurity and traceability outcomes for livestock industries, jurisdictions and the Commonwealth Government.

Australian Livestock Exporters' Council has consulted its membership and received in-principle support for the four draft recommendations provided to industry for consultation. However, please note that the outstanding cost-benefit analyses being undertaken by the Centre of International Economics for the SAFEMEAT Sheep Traceability Working Group; and the independent assessment of the performance of Victoria's electronic identification system against existing mob-based systems will ultimately inform ALEC's position on Recommendation 3.

ALEC is strongly supportive of systems that enhance the traceability of livestock in the event of an animal disease emergency or a food safety event and protect existing and future market access opportunities. There are, however, many factors to be considered in the implementation of such a system.

The costs of introducing electronic identification devices (EID) and associated handling infrastructure for additional species will affect the broader supply chain, including livestock export. The introduction of EID's will be particularly problematic for live sheep exports given the very large volumes of animals needing to be handled within short periods of time. An export consignment can be made up of 250-350 vendors supplying sheep, which puts operating logistics under a lot of pressure. Any EID mis-reads or no-reads during receipt and dispatch from export quarantines will compound this pressure and make data control management labour intensive. It is therefore imperative that the impact on the livestock export supply chain is included in any cost benefit analysis.

The potential for regulatory enforcement on live sheep exporters to 'trace individual sheep' in overseas markets upon discharge from vessels is also a concern for the industry, due to the added complexity and associated costs. Further to this will be issues encountered with reading accuracy, monitoring and audit requirements, in addition to setting up destination supply chain participants in market. Consideration of these concerns is necessary when undertaking cost benefit analysis.

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Delivery against Recommendation 4 is therefore integral to successfully enhancing the biosecurity and traceability outcomes for livestock industries. Without a strong commitment from all levels of government and industry and a long-term sustainable funding mechanism there will be a significant impact on commercial operators at all levels, resulting in ongoing resistance toward the adoption of EID.

ALEC looks forward to continuing the development of these recommendations through the SAFEMEAT framework in collaboration with SAFEMEAT members.

Regards,

Mark Harvey-Sutton
Chief Executive Officer
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