



9<sup>th</sup> March 2023

Department of Agriculture, Fisheries and Forestry  
Animal Welfare Branch  
70 Northbourne Avenue,  
Canberra 2601, Australia

Dear Animal Welfare Branch,

**Subject: NFF submission to the Inspector-General of Animal Welfare and Live Animal Exports**

The National Farmers' Federation (NFF) appreciates the opportunity to provide a submission to Department of Agriculture, Fisheries and Forestry's (the Department) Inspector-General of Animal Welfare and Live Animal Exports Consultation Paper (Consultation Paper).

The 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 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 health and wellbeing of animals are entrenched in Australian agriculture. Producers are committed to continuous improvements in welfare outcomes, investing hundreds of millions of dollars for projects and research activities related to animal health and welfare. This commitment is important not just to how producers raise their animals, but also to underpin ongoing community trust and support for Australia's livestock industries. This extends beyond just the properties livestock are raised on, but throughout our value chains.

The NFF notes the Department's Consultation Paper pertains principally to current and proposed processes and functions associated with live animal exports.

The confidence Australian producers have in live animal exports is underpinned by the commitment of the export industry to ongoing improvements in welfare outcomes. The evidenced-based and independent reviews and recommendations of the current Inspector General of Live Animal Exports (IGLAE) supports this.

Given the focus on live exports, associated specific functions and regulatory activities, the NFF encourages the Department to closely consider the views of the

Australian Livestock Exporters' Council via the submission made by the Red Meat Advisory Council. In addition to this, the NFF would like to make note of some high-level issues as outlined below.

The NFF reiterates the sector's confidence in the work undertaken by the existing IGLAE. The functions undertaken by the Inspector General provide a valuable review of compliance systems and outcomes. Ongoing advancements of evidence-based data collection and reporting processes not only underpins producers' ongoing confidence in live export supply chains, but supports the ongoing adoption of positive animal welfare outcomes by industry. This is important for an industry often impacted by vexatious misinformation.

Given this, producers have no principal objection to efforts undertaken as part of this process which seek to *appropriately* enhance the review and reporting functions in a manner consistent with the approach currently undertaken by the IGLAE.

However, efforts must be made to ensure reporting or review outcomes is not used to advance anti-livestock production – rather than welfare – agendas, via the purposeful misuse and misrepresentation of reported outcomes. Moreover, in seeking to establish increased reporting, the implications and impact of those reports should be considered in the context of protecting the personal safety and privacy of industry participants and their representatives from any resultant threatening behaviour.

Further to this, the NFF would encourage the Department to ensure any expansion of the functions of the IGLAE is not duplicative with processes currently undertaken either by the IGLAE or elsewhere in the Department. Such duplication will likely act to hinder, rather than support, the ongoing reporting of welfare outcomes and compliance efforts of exporters.

The NFF notes to the consideration of the IGLAE functions being expanded to potentially include *'reviewing/reporting on the Commonwealth's interaction with state and territory welfare organisations'*. The NFF views this consideration as being beyond the scope of the existing intent and function of the IGLAE and other expansion options presented in the Consultation Paper. While the NFF encourages jurisdictional harmonisation of welfare standards and guideline processes, the Consultation Paper notes the separate process underway for reviewing national and State/Territory animal welfare frameworks and strategies.

Finally, we encourage the Department to consider the merits of the current Inspector General continuing to the completion of their present term of appointment. Pending any reasonable outcomes or recommendations of this current review process, producers would support the appropriate additional resources being provided to the current IGLAE to sufficiently execute any additional functions ascribed to that office. We believe this approach will best support continuity of function, avoiding any workplan or reporting disruption.

Should you seek further information, please do not hesitate to contact [REDACTED]

Yours sincerely,

[REDACTED]

**TONY MAHAR**  
Chief Executive Officer