



THIS IS A JOINT SUBMISSION FROM THE AUSTRALIAN MEAT INDUSTRY COUNCIL AND THE GOAT INDUSTRY COUNCIL OF AUSTRALIA TO

**Queensland Parliament
State Development, Natural Resources and Agricultural Industry
Development Committee**

IN RESPONSE TO

Agriculture and Other Legislation Amendment Bill 2019

10 September 2019

About The Australian Meat Industry Council

The red meat sector is now Australia's No.1 agricultural enterprise. The Australian Meat Industry Council (AMIC) is the only employer association and recognised Peak Council in Australia, representing the commercial export and domestic meat processing industry.

AMIC is also the Peak Industry Council representing the post-farm gate sector including abattoirs, smallgoods manufacturers, wholesalers, distributors, boning rooms and independent retail butchers

AMIC provides services and support to members that improves their working environment and is focused on achieving the best outcomes for the industry and its members as part of one voice on issues critical to their business.

About The Goat Industry Council of Australia

The Goat Industry Council of Australia (GICA) is designated as a Commodity Council of the Federation by Federal Government. Under its charter as a Commodity Council, GICA is specifically designated as the organisation that develops collective goat industry policy, across all breeds. GICA works with Government, industry bodies, producers and other peak industry councils to this end.

Agriculture and Other Legislation Amendment Bill 2019

The Australian Meat Industry Council and the Goat Industry Council of Australia reject *Clause 33* which intends to amend section 180 (c) of the Biosecurity Act 2014. The proposed amendment intends to omit the exemption for moving goats without an approved device.

180 Exemptions from approved device requirement

A person does not commit an offence against the approved device requirement in relation to the movement of a special designated animal if—

(c) the special designated animal is a goat and all of the following apply—

- (i) the first part of the movement of the animal is direct from a place where it is living in a wild state to a place (a **sorting place**) where it is held for the purposes of collection and sorting;
- (ii) the second part of the movement of the animal is direct from the sorting place to a meat processing facility;
- (iii) the movement otherwise complies with the movement requirements prescribed under a regulation.

For background on this issue in November 2014, AMIC and GICA identified multiple reasons for industry requiring the option of tag free movements for rangeland goats. Those reasons remain valid today.

Harvested Rangeland goats pose minimal risk to exotic disease.

It has been discussed widely within exotic disease workshops and Animal Health Australia based projects that feral animals pose little exotic disease threat due to population disbursement and lack of ability for agents to travel from one herd to another, as opposed to farmed animals and their movements. It has been suggested that within wild populations, disease would simply 'burn out'.

Harvested Rangeland goats pose a minimal bio-security risk.

The meat processing sector reports that, relative to other species, harvested rangeland goats present with much less incidence of endemic disease. Further, industry plays a very important environmental stewardship role in removing potential carriers of animal diseases from the Australian landscape. This has been backed up by work undertaken by the NSW DPI Western catchment Management Authority within several publications including *'Rangeland-goat-production-in-western-NSW Case studies of seven successful enterprises'* as one example. The report is available at the following link:

https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0007/449323/Rangeland-goat-production-in-western-NSW.pdf

Harvested Rangeland goats pose a minimal residue risk.

The National Residue Survey (NRS) goat program has been operating for over a decade, the program involves the testing of Australian goat tissue samples for a range of pesticides, veterinary medicines and environmental contaminants. The program ensures goat exports satisfy Australian export certification and importing country requirements. In addition, the program supports industry quality assurance initiatives and enables domestic meat processing facilities to satisfy state and territory government regulatory authority licensing requirements.

Since 1 October 2010 to there has been only one violation identified in harvested rangeland goat samples. In 2014 for the anthelmintic Moxidectin which was found in a harvested rangeland goat. The NVD for this lot indicated the animals were tagged and had been shorn only a month prior to consigning for slaughter, however Q2 has been ticked for rangeland goats. It would appear the stock have been mis-described on the NVD. Harvested Rangeland goats by their nature are not husbanded or treated with veterinary medicines and therefore pose a minimal risk.

Tag free movement options minimises stress for animal welfare purposes.

There is a clear correlation between animal welfare stress and the impact on product quality and even mortality. For harvested rangeland goats there have been significant and noticeable gains in minimising livestock deaths through improved animal handling along the supply chain. It would be detrimental to see a reversal in this trend due to additional handling requirements on rangeland goats through a blanket requirement to tag.

Tag free movement options minimises stress for food safety and product integrity purposes.

There is a clear correlation between animal welfare stress and the impact on product integrity. For rangeland goats there is published evidence that additional stress on rangeland goats can have adverse impacts on salmonella counts; with literature dating as far back as 1981 support this. <https://www.ncbi.nlm.nih.gov/pubmed/7342946> Point of entry testing for E.coli and other pathogens classified by USDA as adulterants pose a significant market access risk that can lead to market failure.

Tag free movement options minimises OH&S issues.

OH&S has been identified as a key reason for the exemption. Exemptions are afforded for the tagging of dangerous bulls and animals under other NLIS programs. Rangeland goats are wild animals which pose a significant risk to the safety of any operator required to handle the animals.

We acknowledge that tagging is required for live export goats and some supply chains are now better equipped to manage OH&S issues under these circumstances for small quantities of animals, however the OH&S risk as a whole still stands and is a key concern to stakeholders.

Commercial rangeland goat harvesting reduces Government and industry cost associated with pest control and total grazing pasture.

The commercial rangeland goat Industry provides a community service by managing eradication of an introduced species. Without this industry substantial cost could be incurred in pest management, potential environmental degradation and loss of species. Total grazing pressure (TPG) can be eased through removal of harvested rangeland goats from the landscape. The management of these animals is crucial to the TPG strategies that have been funded and implemented through government funding. Removal of the tag free movement options will remove the impetus for graziers manage the harvested rangeland herd.

Early 2015, GICA and AMIC jointly proposed the development of a range of industry solutions to strengthen rangeland goat traceability for tag free movements. This proposal was endorsed by the NLIS Advisory Committee and NLIS Monitoring Committee.

In February 2016 the *Industry NLIS Standards for Operating a Goat Depot* was developed and in 2017 the NLIS NVD GO517 (Goats) was updated, as were the explanatory notes to further underpin the requirements to be eligible for tag free movements, and responsibilities of the consignor in relation to LPA obligations.

The tag free movement option does not negate the use of an NVD for harvested rangeland goats. These animals still have traceability through the NVD without the risks posed by unnecessary human interaction.

NLIS Sheep and Goat National Business Rules currently state:

“Rangeland (feral) goats consigned directly or via a depot to an abattoir for slaughter do not need to be tagged. If retained in the depot for the purposes of farming, the goats must be tagged with a depot transaction tag within 10 days. (Clause 2.5.2 NLIS Sheep and Goat Business Rules)”.

Note:- the *NLIS Sheep & Goats National Business Rules* are currently being converted to NLIS Sheep & Goat Standards.

The Agriculture and Other Legislation Amendment Bill 2019 - Explanatory Notes at page 27 state:

The Safemeat Partnership which ensures hygiene and safety standards of red meat and livestock products includes the Goat Industry Council of Australia. The Safemeat partnerships supports the proposed amendments relating to goats.

This statement is in fact untrue. The proposed Bill has not been presented to SafeMeat partnerships for a position to be provided. Neither AMIC or GICA have had the opportunity to review the proposed legislation through SafeMeat partnerships, nor was either organisation consulted directly.

However the issue of harvested rangeland goat exemptions, sold direct to slaughter or directly to a registered goat depot, has been discussed at SafeMeat Partnerships with GICA and AMIC who are both members of SafeMeat Partners consistently and strongly rejected this proposal.

This issue was raised as recently as June 26 2019, where the minutes for SafeMeat Partners Group meeting No 63 record GICA's opposition to the removal of tagging exemptions.

GICA did not support removing tagging exemptions for rangeland goats (this issue has also been brought into the development of the sheep and goat standards).

At this point the issue is still under consultation and no determination has been made, as such it is misleading for the explanatory notes to state SafeMeat Partners supports the amendment.

Neither AMIC nor GICA are aware of any evidence where rangeland goat movements were being processed without adequate control or misuse of the current exemptions as stated in the explanatory notes.

GICA's current policy as attached and supported by AMIC states:

GICA supports that harvested rangeland goats (also referred to as feral or rangeland goats) are allowed to move without an NLIS tag from the property of capture directly to an abattoir for slaughter, OR via one registered goat depot (where they are allowed to be held tag free for up to 10 days) and then moved directly to an abattoir for slaughter.

Conclusion

AMIC and GICA support livestock tractability and recognise traceability is critical to biosecurity and therefor market access. However there is currently no evidence to support the increased biosecurity risk nor the diminishment of the robust biosecurity standards posed by the tag free movement of harvested rangeland goats. On the contrary enforcing the tagging of rangeland by removing section 180 (c) of the Biosecurity Act 2014 will enhance risks to market access, animal welfare and the safety of employees

AMIC and GICA support the current NLIS tag free movement option for harvested rangeland goats consigned direct to slaughter or direct to a registered goat depot and for the dairy goat industry.

Yours sincerely,



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