



CATTLE COUNCIL OF AUSTRALIA

31 October 2019

DEPARTMENT OF AGRICULTURE'S PROPERTY IDENTIFICATION REFORMS

Cattle Council of Australia is the peak body representing the interests of Australia's grass-fed-cattle producers. The Council was formed in 1979 and has for 40 years served its constituents in its own right, as a member of the National Farmers' Federation and, more recently, as a member of Red Meat Advisory Council and Animal Health Australia.

Background

The Commonwealth Department of Agriculture (DoA) has announced its intention to enhance Australia's traceability arrangements across animal, plant and food industries. As indicated on the Department's website, the three primary objectives of this enhancement are to assist with:

- the management of pest and disease outbreaks
- the management of food-safety, trade and market-access requirements, and
- addressing consumer interest in product sustainability, ethics and providence.

The Department has asked for community feedback on the draft livestock- and plant-sector principles and business rules, which have been developed by a working group comprising jurisdictional governments and the Commonwealth.

Submitters have been asked to respond to the following points:

- how the proposed changes will affect specific industries;
- how disruptions, including integrating with existing or planned systems, can be minimised;
- what points in the supply chain need a property identifier; and
- how system compliance can be improved.

General comments

As a national representative body, Cattle Council continues to press for national consistency across a wide range of State/Territory legislation and regulations that affect its constituents.

Australia is encumbered by a federated system of government that most often places agriculture at a disadvantage when compared with many overseas competitors. Improving our competitiveness will require ongoing co-operation between Australia's many governments to effect positive change in the way farm businesses are impacted.

Property identification is a case in point. Jurisdictional disparity in the rules that apply to applications for, and implementation of, property identification codes (PICs) for the livestock sector has long been contentious.

It is for this reason Cattle Council strongly supported the IGAB Review Panel's recommendation that, "Jurisdictions should develop a nationally consistent system for the allocation and use of property identification codes (PICs) across the animal and major plant production sectors" [Rec 6], and congratulates the National Biosecurity Committee and DoA for taking leadership roles in meeting the challenge encased by this recommendation.

Introducing the concept of identifying properties involved in plant production has proved the catalyst for a timely overhaul of the current system.

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General response to the draft principles

Reflecting on the three primary objectives listed under Background above, Cattle Council supports the move to tighten and broaden land-based identification codes.

‘Tightening’ will lead to nationally consistent rules for the application of PICs across single and multiple blocks of land; ‘broadening’ will involve expanding the application of codes to cover parcels of land and handling facilities used in plant-based food production. This will be possible through the application of modern GPS and tracking capability and will allow, as required in the primary objectives, for the movement of all food to be tracked, when necessary, across all points in the value chain.

Specific response to each draft principle

The following draft principles have been presented by the DoA as the basis for any changes to property identification arrangements. Cattle Council’s comments follow each principle.

1. There will be a consistent property identification approach across animal (livestock) and plant industries, to the extent practicable.

Supported. As mentioned above, in a perfect world each and every article of produce would be traceable throughout its journey along the value chain, from property to plate. For the cattle sector, the National Livestock Identification System (NLIS) theoretically delivers accurate tracking of all animals until slaughter; however, some other livestock sectors and the plant sector generally lack any NLIS-type facility. While a consistent property identification approach should fill the gaps, improvements to the NLIS must remain a priority for industry.

2. A property will consist of one or more parcel(s) of land that are contiguous or sufficiently proximate, operated as a single business under the same ownership or management arrangement.

Partly supported.

The features of this principle that are supported are ‘contiguous’ and ‘same ownership / management arrangement’. Problems may arise with the definition of ‘single business’: it is possible multiple businesses are run on the same parcel of land under the same management arrangement; this should not require multiple PICs.

Cattle Council also questions Underpinning Business Rule 2.3 (*A contiguous parcel of land that is within a different state or territory cannot form part of the property, unless with the agreement of relevant jurisdictions*). If these reforms are to deliver nationally consistent application of PICs, a jurisdictional boundary should have no bearing on the PIC for any one contiguous parcel of land, whether it straddles a border or not.

“Sufficiently proximate”, as mentioned in this Principle and under Business Rule 2.6 (*Parcels of land that are not contiguous may share the same property identifier at the discretion of the issuing authority when they operate together as a single business, are sufficiently proximate and the biosecurity risk is assessed to be the same*), needs defining and to be consistent across all jurisdictions.

3. There is to be a unique property identifier establishing the physical location of the property

Supported. With GPS co-ordinates providing background support for PICs, it seems logical that each and every PIC relates to the physical location of the parcel of land or establishment. Where acreage is involved, it will be necessary to determine a GPS reference point for the PIC, which could be the homestead, the mailbox or similar.

4. An area of land comprising a property should be defined by a unique geospatial identifier

Partly supported.



Consistent with the first point made under Principle 2, for Business Rule 4.2 (*A property can only have more than one active property identifier at a time when there are multiple land uses at the discretion of the issuing authority, and the discrete biosecurity or market requirements and associated biosecurity risks can be clearly delineated*), it would seem possible, if not desirable, for a single PIC to apply to the property, regardless of how many land uses are on that property.

All other Business Rules under Principle 4 are supported.

5. A property identifier will be mandatory for properties used for keeping livestock, growing/propagating plants, and within the supply chain for domestic consumption or export.

Supported. Anything less will lead to a weakening of the PIC system.

6. Property identifier data must include property owner and contact details; property street address; the type(s) of enterprise(s) being conducted; plant products on property; associated enterprise ownership details; pest and disease status

Cattle Council defers its opinion on this matter to the Integrity Systems Company (ISC). ISC is responsible for managing the industry's Livestock Production Assurance (LPA) program and the NLIS, both of which rely heavily on data attached to PICs.

7. Data are to be updated regularly

Supported. At it currently stands, there is a disparity between jurisdictions on the renewal period for PICs: some require two years, some three years, and some are open. This needs to be standardised. Cattle Council therefore supports Business Rule 7.2 (*Property identifier information will be renewed at least every three years*), provided it is applied consistently across all jurisdictions.

It should be noted that LPA renewal is required every three years, which enables details of accredited producers to remain relatively current and provides a periodic opportunity for industry systems to be amended and constituents to be informed.

8. In the event of a biosecurity/food safety emergency, the property identifier and associated data are to be shared to the maximum amount permitted, consistent with privacy legislation, amongst the Commonwealth, states, territories, research laboratories and industry, as appropriate

Supported. Privacy laws encumber agricultural sectors' and governments' attempts to run many industry programs efficiently. While compliance with these laws is necessary, there often appears an over-exuberance in second-guessing what is required for such compliance. To have this clarified for the benefit of applying PICs would be beneficial.

Regarding Business Rule 8.3 (*The following information is to be available to industry if the owner of the identifier opts in for its release: the type of livestock kept on the property identifier*), DoA should consider owners having to opt out (rather than opt in) when it comes to sharing information that is not 'commercial-in-confidence'.

9. The property identifier and associated data are to be provided to, and integrated with, plant traceability arrangements, and export certification

Supported. This is consistent with Recommendation 6 of the IGAB Review (see under General comments above).

10. Governance arrangements that identify roles and responsibilities of system participants and ensure consistency of implementation are to be established. This will include the Australian Government, state and territory governments and industry.

Supported.



Response to broader questions

The Department has requested a response to four broad questions, mentioned earlier under Background and reiterated here, with Cattle Council's comments following each.

1. How will the proposed changes affect specific industries?

For the grass-fed cattle sector, which is governed by existing jurisdictional rules for PICs, producers will experience adjustments that will vary in severity depending on the jurisdiction(s) in which they operate. Transition arrangement need to accommodate this.

As an underlying principle, the cost of any additional administration must be outweighed by the potential benefits in biosecurity the proposed changes will bring, including the introduction of national consistency for producers who own properties across multiple jurisdictions.

2. How can disruptions, including integrating with existing or planned systems, be minimised?

The livestock sectors that utilise industry-driven assurance systems will experience change that will have to be integrated in one form or another into the existing systems. For example, the cattle sector's LPA accreditation is charged on a per-PIC basis, so additional PICs for any one producer may lead to additional LPA costs. Also, National Vendor Declarations and Cattle Health Declarations may need to be adjusted to accommodate multiple-PIC information.

This is why it is critical for industry to be involved in any reform discussions and decisions.

3. What points in the supply chain need a property identifier?

With the exception of transport, all points in the supply ('value') chain where agricultural produce, including livestock, is held should be provided a property identifier.

In its on-line call for submissions, the DoA has provided 23 examples of points in the value chain it is considering for PIC application. By applying the DoA's three objectives for the proposed national scheme, Cattle Council supports all 23 as requiring a unique identifier.

Cattle Council also supports the DoA's proposition that, "Properties that store processed food products or manufacture food products from processed food inputs (i.e., do not use raw inputs) will not require a property identifier"; however, it should remain a priority for traceability to be developed from property to plate, such that consumers have the ultimate capacity to know exactly where their food has originated. For the livestock sector, this means continual improvement in the NLIS and its linkages with end-product packaging and sales.

4. How can system compliance be improved?

Compliance requires a joint effort from governments, industry and, in worst-cases, the judiciary. It may be helpful for a Memorandum of Understanding to be developed between industry and governments that would provide clarity around the role of each party in raising awareness of any new scheme and ensuring compliance to the maximum extent possible. DoA's Principle 10 and associated Business Rules cover this to a large extent.

One aspect affecting compliance, for example, is determining who is to be responsible for notifying of product/livestock movements. At present in the cattle sector it rests with the purchaser; some are suggesting compliance rates might be improved if the responsibility is passed to the vendor. Such finer details need to be resolved by all parties involved.

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