



CATTLE COUNCIL OF AUSTRALIA

SUBMISSION

21 August 2020

Ann McDonald
Department of Agriculture, Water and the Environment
GPO Box 858
Canberra ACT 2601
By email: exportlegislation@agriculture.gov.au

Dear Ms McDonald

Re: Consultation Draft Export Control (Animals) Rules 2020

Cattle Council of Australia (Cattle Council) is the peak industry organisation representing Australia's beef cattle producers. Established in 1979, Cattle Council brings together all state-based farming organisations representing cattle producers in their jurisdiction, associate member organisations with close connections to the cattle industry, and individual cattle producers.

With over 1,095,325 head of Australian cattle exported to over 23 countries annually, at a value of A\$1.2 billion¹, it is vital that Australia has a regulatory framework that, consistent with the Australian Government's commitment, enhances the competitiveness and productivity of the agriculture sector and fosters further development of the live export of cattle.

Cattle Council supports the government's commitment to improving agricultural export legislation. As the foundation of the supply chain for live exports, cattle producers require modern, relevant, responsive, and efficient legislation that can assist in gaining market access and sustaining trade. Cattle Council welcomes the opportunity to provide feedback on behalf of beef producers to the Consultation Draft Export Control (Animals) Rules 2020 (the Rules).

The importance of a prosperous live export industry cannot be underestimated, particularly for beef cattle producers in the Northern Territory, Western Australia, and Queensland. Northern beef production systems are now predominantly focused on the live export trade, and it is an integral component of several free trade agreements. The reliance on these export markets is reinforced by a lack of domestic processing opportunities in the north, long distances to southern markets and biosecurity risks and concerns.

Cattle Council supports the Australian Livestock Exporters' Council (ALEC) and LiveCorp submissions to this process. In addition to the specific, technical feedback regarding the draft provisions for the Rules provided by ALEC and LiveCorp, Cattle Council makes the following general comments.

Live export regulation has had a considerable overhaul in recent years, resulting in unnecessary regulatory creep, and increased regulation imposed on industry with no scientific or other acceptable justification. As noted in Cattle Council's submissions to the department's previous export regulation reform processes, it is essential that any changes to the Rules (or to the administration of the Rules) does not impose additional

¹ Value analysis of the Australian live cattle trade, Matt Dalgleish, Olivia Agar, Robert Herrmann, Mercado. November 2018

cost on industry; and that any necessary changes result in measurable improvements to the system and/or to administrative processes that reduce costs and duplication or provide greater certainty.

It is critical that the regulatory framework governing live export is based on firm scientific principles. A robust, efficient, scientifically based framework has the potential to provide opportunities for producers, particularly in its ability to underpin the integrity of health and welfare outcomes for Australian cattle in international supply chains. Cattle Council supports the government's intention to NOT make significant changes to export policy or to the current baseline of regulations as a result of changes to the legislative framework; however, we don't believe that the current draft is effective in achieving this aim.

Exporters report that there is a real risk that without the right regulatory framework, that is based on sound scientific principles and data and is inclusive of all aspects of the supply chain, Australia will not be able to capitalise on any growth in demand from our international markets. It is essential that any changes to the Rules or their administration do not impose an additional cost burden on producers or exporters and streamline the administrative process to reduce costs.

Given the requirement that the Rules be read in conjunction with the *Export Control Act 1982*, it will be important for government to support industry in communicating correct compliance with the Rules. The live export industry is an integral market for Northern Australian beef producers and an important contributor to the diversity and success of those regional economies. Government and industry must work together to eliminate duplication and unnecessary red tape to increase efficiencies for the Australian beef industry.

Cattle Council is concerned about the disparity of process between the drafting of the Meat and Meat Products Rules and the Export Control (Animals) Rules. While we recognise that the Animals Rules are in the initial drafting stage and there are plans for more formal consultation in the coming months, we are concerned that the 28 March 2021 commencement date will not allow considered industry consultation and feedback on changes required. As such, we request more information from the department about why the process for the Animals Rules has not been provided the same length of consultation time and a guarantee that changes will not be rushed to the detriment of northern beef producers.

Consultation on changes to the Rules needs to be provided the due attention and process necessary to ensure minimal unintended regulatory outcomes and seamless implementation. Given the time and the number of drafts required to produce the Meat and Meat Products Rules (which are still not finalised and have been identified by industry and the department as requiring further redrafting), and the considerable industry consultation that has gone into the various versions of these rules, Cattle Council suggests an expedited consultation and redrafting process should be undertaken as a matter of urgency. The department has expressed a willingness to ensure industry is provided the opportunity to assist in 'fine tuning' the Meat and Meat Product Rules. We consider that redrafting work and extensive industry consultation is required for the Animal Rules, and this process should be consistent with the approach taken in the drafting of the Meat and Meat Product Rules.

Cattle Council looks forward to further consultation with the department on this important process. If you have any questions regarding this submission, please do not hesitate to contact us on 1300 653 038.

Yours sincerely

Travis Tobin
Chief Executive Officer