



For all creatures great and small.

Regulatory Burdens – Primary Sector
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

21 September 2007

Dear Sir or Madam

RSPCA comment on the draft research report *Annual Review of Regulatory Burdens on Business: Primary Sector*

RSPCA Australia appreciates the opportunity to comment on the recently released draft of the above-mentioned report. We will limit our comments to those issues raised in the report that directly relate to animal welfare, namely:

3.6 Livestock export controls: Poor design of the Australian Meat and Livestock Industry (Export Licensing) Regulations

As the Productivity Commission's assessment points out, the changes to the Regulations came about following recommendations expressed in the Keniry report. The resulting Australian Standards for the Export of Livestock were developed to help regulate the live export industry after demonstrable failure of this industry to achieve acceptable outcomes under self-regulation.

We strongly support the intention of the amended Regulations to ensure that livestock exporters meet minimal animal welfare standards. In addition to urging that the Standards be regularly reviewed, in the upcoming review of the Live Export Standards Advisory Committee, on which RSPCA Australia is represented, we will be requesting the Committee to broaden its representation to include scientific as well as legal input to ensure that any revisions and recommendations are made in the best interests of the animals concerned.

3.8 Transport issues in agriculture: Interjurisdictional inconsistency

RSPCA Australia believes that harmonisation of road transport legislation, in particular the road transport of livestock, is essential to the efficient and cost-effective movement of goods (livestock) between jurisdictions.

To this end, RSPCA Australia will be urging the Australian Government to ensure that the livestock transport standards (currently under review) are incorporated into nationally consistent legislation within two years of the endorsement of the Standards.

3.10 Animal welfare: Progress in implementing rule harmonisation

RSPCA Australia is very supportive of the Australian Government's initiative to enhance animal welfare arrangements throughout Australia under the guidance of the Australian Animal Welfare Strategy (AAWS).

Despite the AAWS process having made a slow start, it has managed to bring together a wide range of stakeholders who discuss animal welfare issues in an open

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and frank manner on a regular basis. RSPCA Australia sees this as a positive development. With regard to the conversion of *Model Codes of Practice for the Welfare of Animals* into *Standards and Guidelines for the Welfare of Animals*, the nature of the livestock transport Codes currently under review is such that they cover a wide range of species and thus have been especially difficult to progress. Given this limitation however, RSPCA Australia has had concerns about the process by which the standards are being developed. In particular, RSPCA Australia is concerned that there has been significant deviation from the agreed terms of reference resulting in the intended facilitator of the process (Animal Health Australia) now having sole responsibility for the drafting of the document rather than the original, and more independent, Writing Group. We are optimistic that future Code reviews will be more streamlined and that the problems occurring with the current review of livestock land transport Codes will have been significantly reduced.

RSPCA Australia agrees that development and implementation of the *Standards and Guidelines for the Welfare of Animals* need not exceed two years. Harmonisation of animal welfare legislation coupled with the incorporation into legislation of standards derived from the previous *Model Codes of Practice for the Welfare of Animals*, should see a significant improvement in the overall treatment of animals in all sectors and an improved ability to pursue acts of animal cruelty.

RSPCA Australia strongly supports continued Government funding for the AAWS process.

3.13 Food regulation

RSPCA Australia believes that consumers have the right to be provided with full and accurate information about the origin of the products they buy to enable them to make informed decisions without being misled.

RSPCA Australia will be seeking the Productivity Commission's advice on the matter of labelling of animal products. In particular, we will be inquiring whether the Commission would consider investigating the possibility of developing nationally recognised standards which define animal welfare-oriented production methods.

RSPCA Australia wishes to work with the appropriate regulatory bodies and other stakeholders to help define the terms used in welfare-related labelling of animal products to ensure that they accurately reflect production systems.

3.14 National Livestock Identification Scheme

RSPCA Australia supports the continuation of the National Livestock Identification Scheme as it enables cattle movements to be traced in the event of a disease outbreak thereby ensuring an effective response and minimising the impact on animal welfare. For that reason, RSPCA Australia supports the further expansion of the Scheme to include all commercial livestock being transported off their property of origin.

Please don't hesitate to contact us should you require further information.

Kind regards

A handwritten signature in blue ink, appearing to read "Melina Tensen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Melina Tensen
Scientific Officer (Farm Animals)