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# **SUBMISSION**

16 November 2022

National Agricultural Traceability Taskforce Department of Agriculture, Fisheries and Forestry GPO Box 858 CANBERRA ACT 2601

Via Email: NationalTraceabilitySummit@agriculture.gov.au

Dear Sir/Madam

### Re: Draft National Agricultural Traceability Strategy (2023–2033)

Livestock SA is the peak industry organisation for South Australia's red meat and wool industries. With a membership of over 3,500 beef cattle, sheep and goat production businesses, we work to secure a strong and sustainable livestock sector in South Australia.

Livestock SA is a member of Primary Producers SA and is the South Australian member of the national peak industry councils: Sheep Producers Australia, WoolProducers Australia, Cattle Council of Australia/Cattle Australia and Goat Industry Council of Australia. Through PPSA and the Peak Councils, Livestock SA is also a member of the National Farmers Federation.

Livestock SA welcomes the opportunity to provide a submission to the draft National Agricultural Traceability Strategy.

#### **Background**

Livestock SA understands the purpose of the National Agricultural Traceability Strategy (the Strategy) is to align and maintain momentum with relevant stakeholders around a common vision for an enhanced national agricultural traceability ecosystem. Agricultural traceability facilitates market access, enables prompt response to food safety incidents, and underpins biosecurity systems. The South Australian livestock industry understands the critical role traceability plays in these three areas.

Reported cases of Lumpy Skin Disease (LSD) and Foot and Mouth Disease (FMD) in Indonesia in March and May 2022 respectively have heightened the awareness and importance of an effective, accurate and rapid traceability system to livestock producers and the broader supply chain.

At its AGM in August 2022, Livestock SA launched the first Livestock Biosecurity Blueprint, a strategic document outlining the vision and priorities for biosecurity in South Australia. The priorities align

with the South Australian Sheep and Beef Industry Blueprints and demonstrate the commitment to stronger biosecurity and traceability in our state.

Livestock SA supports the development of the National Agricultural Traceability Strategy and recognises its importance in ensuring agricultural industries continue to improve traceability. Traceability systems need to be nationally consistent, adequately funded and adaptable to meet future requirements.

## **Response to the National Agricultural Strategy**

The National Livestock Identification System (NLIS) database is often criticised for being outdated, and its functions and usability have not kept pace with rapid technological advancements. As such, Livestock SA welcomed the recent Budget commitment of \$26.6 million to upgrade the livestock traceability database as part of the broader traceability reform. While overdue, it is hoped that this investment will deliver greater functionality and provide a better user experience leading to more accurate traceability recording to ensure ongoing consumer confidence in the red meat sector.

One concern for livestock traceability is the industry's reliance on manual input when completing compliance documentation and subsequent record uploads which can result in human error. Any fit-for-future system must have clear pathways to reduce the number of manual interactions with the traceability system. In a more automated system, there must be robust processes in place that protect privacy/confidentiality, API (Application Program Interfaces) interconnectivity between different platforms, a consistent approach to data sharing, and rules that ensure relevant players in the supply chain have access to key information as that will build trust and value in the system and ultimately determine its success.

While the eight objectives in the Strategy are sound, more detail is needed on how some of the priority action areas will be achieved if a truly nationally consistent traceability system is to be realised. For example, creating sustainable funding for traceability initiatives is listed as a priority action in Objectives 1, 6 and 8. This will require broader thinking and a commitment to doing things differently. Due to various factors such as population and the ability to raise revenue, government of the day priorities etc. there is wide differential between jurisdictions on the funding available and/or committed to a range of activities including livestock traceability. Currently, in South Australia, voluntary sheep and cattle producer levies fund 58% of the NLIS system. While in other states this cost is 100% covered by government.

Aligning processes to meet the needs of multiple regulators will be important to improve traceability processes for producers. Livestock SA receives feedback about the number of audits individual businesses are required to undertake for traceability, biosecurity, and the many different commercial farm assurance programs. This creates a lot of duplication for producers from the commercial sector, Integrity Systems Company and for government compliance. These audits take time out of business for the producer and if streamlined to provide auditing through one central system it would save significant industry resources.

Where greater connectivity of different platforms is concerned, livestock producers currently need to interact with several different programs to meet traceability requirements including Livestock Production Assurance, National Vendor Declarations, My MLA, My Meat Standards Australia, Livestock Datalink, and the NLIS database. All of these require separate log ins and perform different functions. South Australia producer have an additional state-specific platform through PIRSA's One Biosecurity. By delivering a modern one-stop digital infrastructure shop it will support users and reduce friction points in livestock traceability to enhance industry compliance.

Geographic locations and consistent livestock movements that are required to underpin sustainable business models also need to be considered. As a central state sharing multiple borders, South Australian producers move and receive sheep and cattle from multiple jurisdictions, with differences in traceability requirements between states increasing workload and confusion for producers.

For example, NVDs for sheep, cattle and goats only require the destination Property Identification Code (PIC) in Western Australia and Tasmania and completion of transport information is mandatory in all states except South Australia and Victoria. This creates confusion for producers moving animals across states and alignment of processes and national consistency would improve traceability and help ensure compliance.

Another example is that in South Australia the National Sheep Health Declaration (NSHD) is mandatory for all sheep movements within, or into South Australia. In all other states this document is voluntary. Again, this is a point of confusion for vendors and purchasers, and often interstate animals coming to South Australia arrive without the necessary NSHD documentation resulting in purchaser and/or government follow up.

Consideration also needs to be given to extension support to ensure system changes are effectively implemented. Livestock SA have delivered a Livestock Biosecurity Extension Project for 2.5 years and are continuing to grow and develop this work. This project has developed and supported partnerships with industry, government, and producers to create strong collaborative livestock biosecurity network in South Australia.

Other states also undertake livestock biosecurity and traceability projects and an understanding of the work underway in each state and territory and the potential for collaboration is needed to reduce duplication and create a consistent traceability system.

## **Summary**

A nationally consistent, adequately funded and adaptable agricultural traceability system is crucial to ensuring Australian biosecurity, product integrity, food safety and market access. A national traceability system must reduce duplication and confusion and increase compliance. A sustained commitment to challenging the way things have always been done, and new funding arrangements that enable a truly national system will need to be considered.

South Australian livestock producers and industries understand the importance of biosecurity and traceability and are actively involved in using traceability to ensure biosecurity and market access requirements are met. To be successful, the National Agricultural Traceability Strategy must deliver a supportive, sustainably funded and consistent system.

Please contact the Livestock SA office on (08) 8297 2299 or via <a href="mailto:admin@livestocksa.org.au">admin@livestocksa.org.au</a> if you would like to discuss this submission further.

Yours sincerely

Travis Tobin
Chief Executive Officer