

16 February 2017

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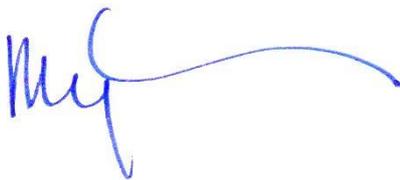
Dear Sir, Madam

Australian Beef Sustainability Framework

Thank you for the opportunity to provide feedback on the draft Australian Beef Sustainability Framework. We have focussed the majority of our comments on the Animal Welfare theme (see attached).

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

Kind regards



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Draft Australian Beef Sustainability Framework - Animal Welfare

RSPCA comments

Retailers, wholesalers, restaurants and food producers are increasingly paying attention to animal welfare. According to the Business Benchmark on Farm Animal Welfare report (2016), “farm animal welfare is emerging as a source of competitive advantage” reflecting consumer demand for higher welfare products. Institutional investors are also interested in animal welfare practices along the supply chain. As an industry therefore, it pays to have a clear and strong agreed commitment to continuously improving animal welfare as well as clearly defined positions on the key animal welfare issues that the industry needs to address, as well as mechanisms through which progress on these issues is reported to the general public.

Priority areas

- Why is a distinction being made between ‘welfare’ and ‘well-being’? This is confusing and they are effectively the same thing. It would be useful to identify priority areas that are recognisable both domestically and internationally. One example is to use the Five Domains (see Mellor 2016): nutrition, environment, health, behaviour and mental state. Another example, possibly better suited to the current ‘Indicators’, are the criteria used in the IFC’s *Good Practice Note: Animal Welfare in Livestock Operations* which lists: proper housing systems, feed and water, husbandry practices, health and disease, transport, genetics and breed selection, slaughter, and stockmanship.

Indicator

- The areas listed under ‘Indicator’ are not really indicators of animal welfare; they are better described as priority areas under the animal welfare theme. Perhaps aligning with the dairy industry’s sustainability framework would be helpful? For example, ‘Indicators’ would become ‘Targets’ and would be written succinctly as aims/goals. And, instead of ‘Measure’, that column would be titled ‘Indicator’ and describe what you’re going to be measuring/monitoring as evidence that the industry is moving towards the agreed target.
- It is important that this document reflect a path of continuous improvement and that improvement can be demonstrated over time.

Livestock handling

- What are considered ‘best practice standards’? The cattle standards, or the guidelines, or something else? ‘Awareness’ of such standards is not enough; measuring ‘compliance’ would be more meaningful.
- How are ‘low stress handling’ and the use of low-stress handling going to be assessed/recorded throughout the supply chain?
- Consider including % electric prod use at saleyards.
- Consider including animal-based indicators of animal welfare (see e.g. <http://www.assurewel.org/beefcattle>).
- Consider including % of cattle sold online, direct and via saleyard (with the aim of seeing a decrease in cattle sold at saleyards and an increase in direct and online sales).

Livestock transport

- ‘Raised stress levels’ is open to interpretation; how is this going to be measured? The realities of cattle transport mean that cattle may not be fit to load but are still loaded, that the cattle are off feed and water for extended periods, that cattle are bruised/injured during transport and/or upon arriving at their destination be that another farm, a saleyard, export port or abattoir. It is this aspect of livestock transport that should be addressed, e.g. through measuring % downers, injuries, etc. upon arrival.

- Consider including % compliance with land transport standards
- Consider including % adherence to time off water limits, e.g. through accurate recording of time off water throughout the journey e.g. using NLIS.
- While ever live exports continue, ASEL compliance enforcement tools need to be more robust. Breaches of ASEL must receive appropriate sanctions.

Biosecurity

- This could be combined with 'animal health'.
- Sentence regarding 'pest and weeds' could be moved to the 'Environmental stewardship' theme.

Animal health

- Consider including the need for cattle to be promptly diagnosed and provided with treatment for injury or disease
- Consider including % improvement in on-farm animal health protocols as a result of e.g. carcass feedback (or some other mechanism)
- Consider including level of antibiotic use on-farm and at feedlots
- Consider including level of HGP use on-farm and at feedlots
- Consider including % of cattle at or above BCS 3
- Consider including responsible use of veterinary pharmaceuticals

Humane processing

- Animal-based measures at abattoirs include not just vocalisation, but also slipping, falling, stunning efficacy, etc.
- Consider including % electric prod use at abattoirs
- Consider including NLIS carcass information e.g. to measure % reduction in downgrades and thereby improvement in cattle handling practices and/or cattle health management on farm.
- Consider including % of abattoirs (export & domestic) using CCTV as a monitoring & training tool.
- While ever live exports continue, ESCAS must be strengthened to, at the very least, ensure animals are stunned prior to slaughter, no leakage of Australian animals occurs, and that compliance enforcement tools are robust. Compliance with ESCAS, at present, is not sufficient to ensure 'humane processing'.
- Consider including % of live export cattle slaughtered without stunning.

Preventable animal mortality

- Consider including number of producers with a drought- and emergency-preparedness plan.
- Instead of % mortality during live export, it would be more meaningful to also include indicators around % animals affected by BRD and heat stress. The same measures should be included for feedlots and for saleyards.

Other (animal welfare theme)

- There is no mention of invasive husbandry procedures and an aim to reduce/replace these with more humane alternatives. Consider including % of polled cattle, % cattle that had the benefit of pain relief when a husbandry procedure was carried out, % of cattle spayed, % of cattle branded using hot-iron brand or freeze brand.
- There is no mention of the need to provide cattle with adequate feed and water.
- There is no mention of the need for cattle to be able to express innate behaviours.
- Consider including mention of breeding practices that focus on traits that are beneficial for good animal welfare, e.g. good mothering, calving ease, temperament.

- The need to review the framework on an annual basis, report on outcomes (i.e. 'Measures'), be flexible in terms of including additional measures as animal welfare science becomes available or as alternative procedures/practices are able to be adopted.
- Somewhere in the framework, or perhaps in a position statement (see below), reference should be made to animal cruelty (as distinct from animal welfare) and that cruelty is not tolerated, should result in instant dismissal, etc.
- Consider including mention of industry funding for animal welfare research.
- There needs to be some basic alignment with the Global Roundtable for Sustainable Beef criteria, particularly from an international market perspective.

Other (general)

- RSPCA does not support the inclusion of live exports in the beef industry's sustainability framework.
- The list of Steering Group members under 'Governance' on the ABSF website (<http://www.sustainableaustralianbeef.com.au/governance>), should include an independent animal welfare representative with expertise in the beef cattle industry to advise on the animal welfare theme of the framework, e.g. Carol Petherick.
- Under the 'People & the community' theme (Food safety and integrity / Consumer preference), it would be appropriate to include 'ethical' in the list of quality attributes the Australian consumer is looking for in Australian beef. A key reason for developing a sustainability framework is surely that the Australian consumer is happy to continue to buy Australian beef because of its ethical qualities, i.e. qualities that take into account the environmental impact of the production system, the people that work in the industry, the people who consume the product, and animal welfare.
- The framework would benefit from a position statement for each of the themes. These themes have been determined to be material issues for the industry and therefore a more in-depth explanation/outline of the industry's goals with regard to the final indicators and measures chosen for each of the themes is warranted.

ENDS