



Submission in response to the

Electronic National Livestock Identification System (NLIS) (Sheep & Goats) Standards and Transition package for Victoria

Victorian Farmers Federation Livestock Group

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The Victorian Farmers Federation Livestock Group

The VFF Livestock Group is the peak representative body for livestock producers in Victoria, operating in its present form since 1978. The Group currently represents the interests of approximately 2000 farm businesses, most of which are family owned and operated.

Membership is state-wide and covers the key Victorian agricultural industries of cattle, sheepmeat, wool and goats. Together these industries' output is valued at around \$2.5 billion for Victoria's rural economies each year.

The VFF Livestock Group's core business involves policy development, issues management and advocacy on behalf of our producer members to industry and government. Through the extensive branch network, VFF Livestock has good contact with producers and coverage of the state livestock issues. There is council representation with 11 regions of Victoria being represented by council members.

Member's views and issues are also pursued at a national level through VFF Livestock's membership of the Livestock Peak Industry Councils - Sheepmeat Council of Australia (SCA), WoolProducers Australia (WPA), Cattle Council of Australia (CCA) and the Goat Industry Council of Australia (GICA). Our voting power with each of these bodies ensures that member concerns are represented at a national level and Victorian interests are well understood across the country.

The VFF Livestock Group welcomes the opportunity to provide feedback in response to the Electronic National Livestock Identification System (NLIS) (Sheep & Goats) Standards and Transition package.



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General commentary

The Victorian government's decision to mandate eID in sheep and goats in Victoria is contrary to the VFF's policy that advocates eID should be voluntary until such time that a nationally consistent system is agreed upon.

It is now the role of the VFF to achieve the best possible outcome for our members and Victorian livestock producers in general.

The VFF believe that any livestock identification system should be nationally consistent and is therefore concerned at the prospect of the isolated position the Victorian industry is now placed in. The Victorian government must ensure every effort is made to guarantee that Victorian sheep and goat producers are not disadvantaged by the mandating of eID.

As this system has been mandated on the Victorian industry, we ask the Victorian government to ensure zero financial impact on-farm during the implementation and to install safeguards to guarantee supply chain costs don't burden livestock producers as the system matures.

The Victorian government must commit to the long term implementation of this system through investment that will result in improved supply chain traceability and emergency animal disease response outcomes. There must be significant focus on enforcement in areas of the industry that have a lessened awareness of the biosecurity risks and their responsibilities; namely hobby farmers in peri-urban sectors and non-accredited online sales of livestock.

Key points and recommendations

Tagging

1. The VFF call for the Victorian State Government to guarantee the cost of eID tags to producers to be kept at 40 cents or lower for a period of 5 years.
2. The Victorian Sheep and Goat compensation fund should not be used for eID tag funding.
3. To ensure the lowest possible cost of tags the VFF recommend DEDJTR should continue to administer the sale of eID tags through the Agriculture Victoria online platform. Further to this the VFF calls for an improved, streamlined and more intuitive online purchase system.
4. Principles of the visual system are to remain. The PIC should be printed on the eID tag and the status quo of colour tag by year as 'highly recommended' should remain. This is for practical management purposes on farm.
5. The government should engage other jurisdictions to enter the eID tag tender process that is currently operating in the effort to provide commercial pressure via volume to the price of eID tags.
6. The Victorian government should encourage other states to enter into a national eID tag tender process effort to provide commercial pressure to reduce the price of tags.
7. The government must ensure it is investing in and recommending eID and scanning technology that is fit for purpose, cost effective and ISO compliant to ensure longevity of the system.
8. After the 1st January 2017 all sheep and goats born in Victoria will need to be eID tagged. All sheep and goats in Victoria sold after 1st January 2022, regardless of age will need to be eID tagged.
9. Only rangeland goats consigned direct to slaughter should be exempt from eID tagging.
10. The VFF question the need to delineate between sheep and goats when purchasing tags as mentioned in S1.2.10. The application of this standard is impractical on farm for producers carrying both species.
11. Bringing uniformity and integrity to the system, S1.2.3 c) should read: *all sheep or goats born outside of Victoria on or after the commencement date*

*that are introduced onto a Victorian farm or feedlot after **1st January 2017** must be tagged with a pink electronic NLIS (Sheep) Post-breeder tag before leaving that property*

12. The VFF has concerns regarding the potential for excessive cost to be imposed on producers where non-reading tags are replaced at the point of sale (ie. saleyards) This is currently the case for cattle producers who have no effective avenue of recourse in this situation.

Scanning

1. Compliance rates are to be set at a realistic level initially then rising to the 98% compliance required by the national agreement.
2. The start date for scanning is to be uniform across the supply chain, including Property to Property, to ensure integrity in the system.
The VFF recommend this date be **1st July 2017**.
3. An accreditation process for all new eID equipment and software should be implemented to ensure not only compatibility between service providers but also durability and effectiveness, all being delivered cost effectively.

Supply chain funding

1. Infrastructure funding needs to be prioritised towards sale yards and abattoirs. Funding should be provided to abattoirs and private and public (shire council) sale yard owners.
2. A business case must be provided by any entity seeking Government funding for infrastructure. The Victorian Government should be mindful not to provide excessive funding in low use areas such as minor and seasonal sale yards and show grounds. Mobile infrastructure or contract scanning should be used in these cases.
3. The funding of infrastructure for the supply chain should be in the way of co-contribution to a maximum level of 50:50.
4. Knackeries should have the same access to funding as other processors to ensure they have the biosecurity and traceability capacity at the same level. The business case should be assessed appropriately on capacity of their operation.

5. Sufficient funding needs to be provided to ensure the eID system is effective and efficient throughout the supply chain. Through this funding, safe guards need to be put in place to guarantee that the cost burden does not lie with the producer. It should be noted that under the proposed system the producer will effectively be the instigator of the life time traceability guarantee in the sheep and goat industries which will create market access opportunities and processing efficiencies for the benefit of all supply chain participants.

Education

1. There needs to be a concerted effort to provide education and training for producers during implementation. Key points would include why the system has been introduced and the responsibilities and application of the eID system on farm.
2. There needs to be a clear message to producers that the only change to on farm practice is the change of ear tag to eID. All other practices relating to on farm management and production are at the discretion of the producer if they see benefit to their own business.
3. This education and training could be delivered by industry extension programs with the assistance of DEDJTR.