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17 February 2017

**Ms Pip Band**

Secretariat, Sustainability Steering Group  
Meat and Livestock Australia

**By email only:** [pband@mla.com.au](mailto:pband@mla.com.au)

Dear Ms Band,

**Re: Animal Medicines Australia Submission on Beef Sustainability Framework**

On behalf of Animal Medicines Australia (AMA), I write to provide our submission to the Beef Sustainability Framework. Our members' products are key inputs to beef and cattle farming systems. They support the safe, sustainable and responsible

AMA and its members welcome the development of the Beef Sustainability Framework and look forward to working with the Steering Committee to support a Framework that delivers a thriving Australian beef industry that continually improves the wellbeing of people, animals and the environment.

Should you have any questions in relation to the issues raised in this submission, please contact me.

Yours Sincerely

SIGNED

Ben Stapley  
Executive Director

**SUBMISSION TO THE  
DRAFT BEEF SUSTAINABILITY FRAMEWORK**

17 February 2017



**Animal  
Medicines**  
Australia

## Introduction

Animal Medicines Australia (AMA) is the peak body representing the leading animal health companies in Australia. AMA member companies are the innovators, manufacturers, formulators and registrants of a broad range of veterinary medicine products that prevent, control and cure disease across the companion animal, livestock and equine sectors. Importantly, AMA's members provide medicines and other products to support the health and welfare of cattle across Australia. This includes products for pain management in animals.

AMA welcomes and supports the development of a comprehensive, evidence based and measurable beef sustainability framework. AMA considers that the framework may be enhanced through adopting our recommendations and suggestions outlined throughout this submission.

## Animal health management plans and antibiotic resistance

AMA supports and promotes animal health management as a central component in maintaining animal health, welfare, and wellbeing. Effective systems for animal health management also support food safety, as well as contributing to improved economic and environmental outcomes by reducing on-farm losses from disease and animal mortality.

Animal health management includes using a range of animal health products (vaccines, nutritional supplements, and antibiotics) and management practices (including pasture management, stock handling, infection control and prevention). Responsible antibiotic stewardship remains an important component of animal health management. Further, care must be taken to balance antibiotic product use where for animal health and welfare, with the need to preserve effective antibiotics for human health.

AMA encourages the Steering Committee to consider including animal health management plans as a key measure across all reporting areas. This approach would achieve greater alignment with rapidly emerging One Health scientific and policy approaches to challenges that span human, animal and environmental health. ALFA/MLA are adopting this approach in their development of a feedlot animal health management plan.

AMA has suggested amendments and additions to the Beef Sustainability Framework below that we consider will reflect the important contribution to beef sustainability that can be made by animal health management plans.

### ANIMAL WELFARE

<b>PRIORITY AREA: Wellbeing</b>
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AMA proposes adding a new measure under the indicator for Animal Health: *'Animal health (including antibiotic stewardship) plans in place to ensure disease prevention and treatment where necessary to avoid animal pain and discomfort'*.

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AMA proposes adding a new indicator:

*Indicator: Animal pain management*

*Definition: Best practice pain management consistent with veterinary guidelines for all routine husbandry procedures to minimise animal pain and stress results in improved animal wellbeing.*

*Measure: The % of the national herd with pain managed consistent with Australian Veterinary Association best practice guidelines.*

*Value chain impact: On farm*

<b>PRIORITY AREA: Welfare</b>	<b>INDICATOR: Preventable animal mortality</b>
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AMA proposes adding a new measure: *'Animal health (including antibiotic stewardship) plans in place to ensure effective disease management and avoid preventable on-farm animal mortality'*.

## ENVIRONMENTAL STEWARDSHIP

<b>PRIORITY AREA: Waste</b>
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AMA proposes including a new indicator:

*Indicator: Animal disease and mortality*

*Definition: Optimising the health of animals from birth reduces pre-farm gate productivity losses, as well as saving inputs (water and feed per tonne HSCW) and outputs (methane per kg LW) from less productive and lost animals.*

*Measure: Animal health management (including antibiotic stewardship) plans in place to reduce waste from animal disease and mortality.*

*Value chain impact: On farm*

## PEOPLE AND THE COMMUNITY

<b>PRIORITY AREA: Food Safety and Integrity</b>	<b>INDICATOR: Antibiotic Stewardship</b>
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AMA proposes the following revisions:

**Definition:** Antibiotic stewardship aims to improve the safe and appropriate use of antibiotics in order to reduce the potential for links to antimicrobial resistance in humans, *and to preserve the effectiveness of antibiotics to treat animals when necessary.*

**Measure:** The % of isolates in beef cattle resistant to Category 1 (Very High Importance in human medicine), *cross referenced with antibiotic usage data to determine if resistance is linked to antibiotic usage or other factors (e.g. co-selection).*

**New Measure:** *Animal health (including antibiotic stewardship) plans in place to improve and demonstrate responsible antibiotic use practices.*