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16 November 2022

Future Traceability Hub

Department of Agriculture, Fisheries and Forestry

Submission by website only: [National Agricultural Traceability | Have Your Say - Agriculture, Fisheries and Forestry](#)

Re: consultation on draft National Agricultural Traceability Strategy 2023-2033

Thank you for the opportunity to provide comment on the draft National Agricultural Traceability Strategy 2023-2033.

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. They are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's \$34 billion livestock industry and the \$30 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

In principle, AMA supports the development of a National Agricultural Traceability Strategy ('the Strategy') to enhance animal health, human health, food safety and trade market access. A national traceability system will provide important assurance to Australia's valuable trade markets and confer a competitive advantage for Australian producers.

AMA member companies produce animal health products that are critical inputs to Australia's livestock production systems. They include tools and technologies that protect and improve animal health and welfare, support effective biosecurity responses and ensure food safety. Biosecurity and food safety are essential foundations for our valuable agricultural and trade industries. Australia has an international reputation as a trusted producer of high quality, and safe, food and fibre, and that reputation provides a competitive advantage in global trade markets.

The health of animals is inextricably linked to the health and wellbeing of people and the environment. Protecting animal health supports sustainable production systems that produce more food and fibre with fewer resources, greater food safety and security, and improved animal welfare with fewer animals lost to preventable disease. Maintaining the health and welfare of Australia's livestock is essential to realise the National Farmers Federation's ambitious goal of Australian agriculture being a

\$100 billion sector by 2030¹, especially alongside unprecedented challenges from global environmental change, consumption and trade volatilities.

The prosperity of Australia's agricultural sector and its ability to deliver on reliable, safe and sustainable production and trade of animals and animal-derived commodities is dependent on the successful adoption of new technologies. Systems, processes and techniques that support the collection and analysis of large data sets are key to critically important animal health strategies for disease surveillance, diagnostics, biosecurity, emergency disease management, regulatory compliance and quality assurance frameworks.

New technologies in animal health require scientific and risk-based approaches and policy settings that aim to eliminate barriers, provide seamless systems across the supply chain, incentivise development of local infrastructure and resources, facilitate collaboration, support regulatory innovation, promote unencumbered trade of animals and animal products, support animal welfare of both livestock and companion animals, and meet the challenges of social license.

AMA supports the government's Principles of Best Practice Regulation to guide how regulation should be approached.² Scientific, risk-based regulation that adheres to these principles is key to maximising productivity and the discipline and rigor provided by these principles encourages regulation that is appropriate, justified, properly targeted and proportionate. AMA expects adherence to the Principles of Best Practice Regulation wherever there is an expectation of compliance by the regulated community. It is important to ensure that any administrative burden arising from a traceability system and placed on stakeholders in the agricultural supply chain is minimised, and duplicative regulatory requirements and reporting obligations are avoided.

In summary, AMA supports the principles of agricultural traceability to protect animal health, human health, food safety and trade market access. A national traceability system will provide assurance to Australia's trade markets and confer a competitive advantage for Australian producers.

We look forward to further stakeholder engagement as the framework and elements of an agricultural traceability ecosystem, and its intersection with existing animal health and production systems, are more clearly defined. AMA suggests that the monitoring and evaluation framework is developed simultaneously with the Strategy to ensure that the objectives are measurable and that the metrics for success reflect the desired outcomes of the Strategy.

If we can provide any further information at any time, please do not hesitate to contact me.

Yours sincerely,

Dr Charmian Bennett

Director Science and Policy

(unsigned for electronic submission)

¹ <https://nff.org.au/policies/roadmap/>

² <https://obpr.pmc.gov.au/resources/guidance-impact-analysis/australian-government-guide-regulatory-impact-analysis>