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Assured Sustainability Claims Working Group
Department of Agriculture, Fisheries and Forestry
Canberra

Submission via DAFF Haveyoursay website for 'Sustainability claims for international markets' consultation

Dear Assured Sustainability Claims Working Group,

**Re: Sustainability claims for international markets**

Thank you for the opportunity to provide comment on the *Assuring agricultural sustainability claims* discussion paper.

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. Our member companies 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 $33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

AMA and its members have a long-standing commitment to an animal health industry that is responsible and sustainable. Our members' products are essential tools that can help meet economic, environmental and social challenges.

AMA acknowledges the Australian government's commitment to investing in various technologies aimed at reducing emissions in agriculture, as well as enabling farmers to demonstrate sustainable actions and make data-driven claims. We seek to ensure that animal health is recognised and incorporated in climate change and sustainability policy frameworks and emissions auditing systems. This will assist in avoiding market distortions in investments that may result in negative animal health and welfare outcomes, with subsequent negative impacts on emissions and climate risks.

Many existing sustainability claims and measures are targeted at crop production, and are not relevant or applicable to livestock production systems.

Further work to develop sustainability claims and reporting requirements relevant to livestock production systems is needed to ensure Australia can demonstrate its sustainability across all key agricultural sectors.

AMA is pleased to provide the following comments to illustrate how sustainability in livestock production systems can be realised and recognised through improving animal health.

### *Animal health and sustainability*

To meet the growing global demand for animal protein, both domestically and in Australia's important export markets, Australian livestock farmers will be required to improve productivity while reducing their environmental impact. The World Organisation for Animal Health (WOAH) estimates that world demand for animal protein will increase by 70% by the year 2050.

However, more than 20% of animal production worldwide is lost as a direct result of animal disease.[1] Every animal lost to disease requires another to be raised in its place to meet market demand, representing resources such as feed, water and land that are not subsequently turned into food. Prioritising the health and wellbeing of livestock ensures that the resources invested in them are maximised and the associated emissions are minimised.

Animal diseases reduce productivity and product quality, posing a direct threat to healthy diets by making nutrient-dense animal protein more scarce and more expensive.

Preventing animal disease is a key mechanism to improving agricultural sustainability. The UN FAO notes that "*improved animal health should be one of the key action points to reduce greenhouse gas emissions",* yet "*livestock, with only 2% of climate finance received, has been one of the least financed sectors*".[2] Healthy animals produce more meat, milk and eggs, and require fewer resources to do so. Improving animal health offers a cost-effective and sustainable opportunity for livestock industries to feed a growing global population, whilst reducing emissions and managing climate risks.

In addition to significant productivity and sustainability benefits, healthy animals produce lower emissions of key climate gases, including carbon dioxide and methane. Evidence of the mitigating impacts of animal health products on emissions related to livestock production is emerging. For example, a recent Oxford Analytica report commissioned by HealthforAnimals[3] found that:

- a reduction of 10% in animal disease levels globally is associated with an 800 million tonne decrease in emissions – the equivalent in emissions of 117 million Europeans.
- A 60% global vaccination rate for beef cattle improves productivity by more than 50%. In upper middle-income countries, a 60% vaccination rate delivers a 34.7% productivity increase – equivalent to the beef consumption needs of 3.1 billion people.
- A 40% vaccination rate in cattle is associated with significant reductions in land use required for livestock production (global average 5.2%).

[1] WOAH: Veterinary Services. VS-FINAL-EN.pdf
[2] UN FAO (2022) The role of animal health in national climate commitments
[3]HealthforAnimals: Animal health and Sustainability: A Global Data Analysis. https://healthforanimals.org/resources/publications/publications/animal-health-and-sustainability-a-global-data-analysis-summary/

- 8.6% more land is required to maintain production when 20% of the global poultry population is affected by disease.

Other studies have demonstrated that mitigation of dairy cattle disease (eg: mastitis, Bovine Viral Diarrhoea (BVD)) was associated with a 5-16% reduction in emissions per kilogram of milk produced [4] and vaccination against endemic cattle diseases (eg: calf pneumonia, BVD, salmonella, Johne's, Infectious Bovine Rhinotracheitis) resulted in reduced emissions of 12 to 277 kt $CO_2$.[5] Validation of these models in Australian production systems would be invaluable for Australian producers to demonstrate sustainability.

The UN FAO has noted that animal health interventions (including vaccination, rumen modification, selective breeding and nutritional improvements) could reduce global livestock emissions by up to 55%.[6] This compares to a 4% emissions reduction associated with reduced consumption of red meat (according to the Australian Dietary Guidelines).

Vaccination, parasite control, and other disease prevention tools, alongside rigorous biosecurity processes and diagnostic technologies are increasingly being used to keep animals healthy. This puts veterinarians at the forefront of livestock sustainability efforts. Greater availability of veterinary services is needed to support sustainability outcomes in the livestock sector.

### *Demonstrating sustainability in livestock production systems*

Australian livestock production systems will increasingly require a mechanism to demonstrate their environmental and emissions reduction achievements, as well as provide incentives for sustainability improvements that can be achieved through better animal health and welfare.

All of Australia's major livestock production sectors have developed sector-specific sustainability frameworks that reflect the growing pressure on agriculture to increase production and improve animal welfare, whilst simultaneously reducing animal disease, decreasing resource consumption, lowering methane emissions, and achieving carbon neutrality. Government recognition of these sector-specific frameworks will support assurance and certification systems and underpin sustainability claims based on these frameworks for market access.

Federal and State governments should recognise and incorporate the sustainability frameworks already developed and implemented by livestock industries within their climate change policy frameworks and emissions auditing systems. It is vital that livestock industries and farmers are empowered to achieve their own emissions reductions targets and contribute to their industry's sustainability goals and objectives. Recognition of the importance of animal health improvements to reduce emissions will assist the National Farmers Federation and livestock RDAs (such as MLA) to reach their respective carbon neutrality goals.

Regulatory frameworks for animal health products need to be amended to accommodate legitimate, science and evidence-based climate product claims, such as methane inhibitors. Australian producers are at considerable competitive disadvantage to other producer markets where the use of such products confer recognised sustainability credentials as well as

[4] Statham et al. (2021). Dairy Cattle Health and Greenhouse Gas Emissions Pilot Study: Chile, Kenya and the UK. Dairy-Cattle-Health-and-GHG-Emissions-Pilot-Study-Report.pdf

[5] ADAS (2015) Study to Model the Impact of Controlling Endemic Cattle Diseases and Conditions on National Cattle Productivity, Agricultural Performance and Greenhouse Gas Emissions. ADAS UK Ltd, Helsby, UK

[6] UN FAO (2023). Pathways towards lower emissions

productivity benefits. These products should be regulated in Australia to ensure efficacy, animal safety, food safety and manage trade impacts, particularly as unregulated products are unlikely to be recognised in trade assurance or accreditation frameworks, and allow Australia to back up related sustainability claims for Australian products.

Animal welfare is a critical component of livestock production systems that is underpinned by good animal health. However, care needs to be taken when using production systems or practices as proxies for animal welfare standards. For example, organic farming systems prohibit the use of most registered animal medicines that deliver effective pain relief, cure infection, prevent parasite infestation and protect against debilitating animal diseases. It is difficult for organic livestock production systems to meet stringent animal welfare standards when they are prevented from using effective veterinary medicines to manage basic animal health issues.

*Summary*

Improving animal health is the foundation for more sustainable food systems. Australian farmers and veterinarians are already charting the course to greater sustainability but need more support.

Developing policies, partnerships and technologies that improve animal health will contribute to improved sustainability outcomes for Australia's livestock sectors. Supporting innovation in animal health will ensure veterinarians and farmers have access to appropriate and effective animal health products. Incentives for farmers to adopt emerging technologies and new practices, and greater availability of veterinary medicines and services to improve animal health, will enable Australian livestock producers to meet the challenges of a more sustainable future.

Yours sincerely,

Dr Charmian Bennett

Director, Science and Policy