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7 April 2025

Department of Energy, Environment and Climate Action
PO Box 500
EAST MELBOURNE VIC 8002

By email only: climate.change@deeca.vic.gov.au

Dear Sir/Madam,

Re: Victoria's 2026-30 Climate Change Strategy

Thank you for the opportunity to provide comment on Victoria's 2026-30 Climate Change Strategy (the Strategy) summary 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. 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 \$33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

AMA member companies play a vital role in Australia's food production, agricultural trade and biosecurity preparedness, as well as ensuring that veterinarians have access to the animal health products they require to maintain and improve the health and wellbeing of our pets, wildlife and competition animals. AMA members develop, register and supply innovative new medicines including vaccines and anti-infection medicines to prevent and control outbreaks of animal disease, as well as medicines and treatments that enable good health and wellbeing, and the production of food and fibre products that are safe for human consumption and use. Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare.

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.

Animal Medicines Australia commends the Victorian Government's commitment to addressing the challenges faced by climate change and is pleased to provide the following comments on the Strategy for consideration by the Department of Energy, Environment and Climate Action.

Key points

- Improving animal health offers a cost-effective and sustainable opportunity for livestock industries to reduce emissions and manage climate risks.

- AMA recommends that the Victorian government recognises and incorporate animal health improvements made by livestock industries within climate change policy frameworks and emissions auditing systems. Incorporating animal health benefits will avoid market distortions in investments that may result in negative animal health and welfare outcomes.
- Recognising the contribution of improved animal health to emissions reduction will assist the National Farmers Federation and livestock sectors reach their respective carbon neutrality goals.
- Regulatory frameworks for animal health products should be streamlined to accommodate legitimate, science- and evidence-based climate product claims.
- A One Health response is required to monitor and predict both direct and indirect biosecurity and disease preparedness risks associated with climate change.

Animal health, emissions and climate change

Improving animal health offers a cost-effective and sustainable opportunity for livestock industries to reduce emissions and manage climate risks. In addition to the significant productivity and sustainability benefits, healthy animals produce less emissions of key climate gases, including carbon dioxide and methane.

In the next 30 years, the global population is expected to increase from 7.7 billion to 9.7 billion in 2050, with the population in Australia and New Zealand projected to increase by 28 per cent.¹

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.²

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 converted into food or fibre. 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".³

The Victorian government has an opportunity to change this dynamic in Australia. Investments in animal health not only support more productive livestock systems but also result in lower emissions and superior animal welfare outcomes, all while meeting increasing demands for animal-sourced foods for growing populations. This investment would offer a pathway for strengthening the sustainability of livestock farming while meeting global climate commitments.

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 HealthforAnimals⁴ 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.

¹ United Nations: World Population Prospects 2019: Highlights. [World Population Prospects 2019: Highlights | United Nations](https://www.un.org/en/development/desa/population/publications/)

² WOAH: Veterinary Services. https://www.woah.org/fileadmin/Home/eng/Media_Center/docs/pdf/VS-FINAL-EN.pdf

³ UNFAO: The role of animal health in national climate commitments; available at <https://www.fao.org/3/cc0431en/cc0431en.pdf>

⁴ HealthforAnimals: Animal health and Sustainability – A Global Data Analysis; available at <https://www.healthforanimals.org/reports/animal-health-and-sustainability/>

- 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%).
- 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, including mastitis and Bovine Viral Diarrhoea (BVD) was associated with a 5-16% reduction in emissions per kilogram of milk produced.⁵ Similarly, vaccination against endemic cattle diseases (e.g.: calf pneumonia, BVD, salmonella, Johne's, Infectious Bovine Rhinotracheitis) resulted in reduced emissions of 12 to 277 kt CO₂.⁶

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).

Incorporate animal health improvements into carbon accounting systems

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.

Biosecurity, zoonoses and disease preparedness

A changing climate and significant global social and economic challenges have changed the way people, animals and our environment interact over the past decade. One Health is a governing set of principles that recognises that the health of humans, animals and our shared environments are intrinsically linked. Understanding and embracing these connections is critical to ensuring a sustainable and resilient future for Australia. AMA seeks to ensure that the importance of animal health is recognised in all national priorities and strategies, including Australia's approach to public health, pandemic preparedness and net zero plan.

Climate change will pose diverse and growing threats to Australia's livestock – as well as public health. Most notably, changing environmental conditions will alter the distribution and behaviour of many animal and insect species, in turn leading to changing distributions of vector-borne diseases.

⁵ Statham et al (2021). Dairy Cattle Health and Greenhouse Gas Emissions Pilot Study: Chile, Kenya and the UK

⁶ 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

The United Nations estimates that around 60% of infectious diseases are zoonotic – that is, they are spread between animals and people.⁷ In Australia, improved animal health management means that the risk of diseases being spread directly from animals to humans is low – but *indirect* transmission (e.g. via insects or food) does occasionally occur.

The best way to prevent zoonotic diseases spreading to humans is to prevent our animals from becoming ill. Healthy animals, and food products derived from healthy animals, are less likely to carry pathogenic organisms that pose risks to human health – but as our environment changes, so do the pests and disease vectors that live among us.⁸

Changing environmental conditions will alter the distribution and behaviour of many animal and insect species, in turn leading to changing distributions of vector-borne diseases. Flies, ticks, mosquitoes and rodents are common disease vectors that can quickly spread into new areas in favourable environmental conditions where they have not been previously detected or routinely looked for, and where the animal and human population may be immunologically naïve.

Environmental stressors can result in altered disease transmission routes (e.g. if the preferential target species for a mosquito is not found in the new environment, it may feed on a new species) as well as increased infectivity and pathogen virulence.

Vaccination, parasite control medications and other disease prevention tools, along with rigorous biosecurity processes and diagnostic technologies are increasingly being used to keep animals healthy – putting veterinarians and vets at the forefront of zoonoses prevention and public health.

The continued spread of H5N1 High Pathogenicity Avian Influenza (HPAI) through domestic poultry and wild bird populations around the world, coupled with the recent transmission from dairy cattle to farm workers in the US, demonstrates the importance of recognising the essential and integral role of veterinarians and animal medicines in maintaining and improving public health.

In April 2024, the European Centre for Disease Control (ECDC) and European Food Safety Authority (EFSA) released a joint report, *Drivers and critical steps for an influenza pandemic due to avian influenza*. The report recommended enhanced surveillance for H5N1 in animals and humans, as well as strengthening veterinary infrastructure, ensuring access to rapid diagnostics, implementing preventative health measures and, importantly, greater collaboration between animal and human health authorities.

While Australia is currently free from H5N1 and the likelihood of transmission of HPAI from animals to humans is low, recent detections of H7 HPAI on poultry farms in Victoria, NSW and the ACT serve as a reminder that a genuine, collaborative One Health approach to disease preparedness and response is more important than ever.

Emergency public health and pandemic planning responses must include provisions to maintain essential services such as food production and transport, and essential veterinary care for animal health and welfare, while ensuring the health and safety of farmers, veterinarians, nurses and others involved in animal production and care. Veterinarians and animal care personnel require rapid access to personal protective equipment, preventative vaccines and freedom of movement to carry out their duties regarding animal health and welfare, as well as providing rapid disease control and containment services, and preventing zoonosis transmission.

In Summary:

Animal Medicines Australia commends the Victorian government's commitment to addressing the challenges associated with climate change.

⁷ United Nations Environment Programme. *Preventing the next pandemic - Zoonotic diseases and how to break the chain of transmission*. https://www.unep.org/resources/report/preventing-future-zoonotic-disease-outbreaks-protecting-environment-animals-and?_ga=2.108792130.1749639790.1643851599-340431516.1643851599

⁸ Alimi et al, 2021. Report of the Scientific Task Force on Preventing Pandemics. Harvard Global Health Institute. <https://cdn1.sph.harvard.edu/wp-content/uploads/sites/2343/2021/08/PreventingPandemicsAug2021.pdf>

Improving animal health is the foundation for more sustainable food systems. Australian farmers and veterinarians are already charting the course to meet the challenges associated with climate change 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 Victorian livestock producers to meet the challenges associated with climate change and move towards a more sustainable future.

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

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Katie', followed by a horizontal line extending to the right.

Dr Katie Asplin

Director, Animal Health Policy and Engagement