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SUBMISSION

20 November 2026

Australian Animal Welfare Strategy Team
Department of Agriculture, Fisheries and Forestry
Australian Government

Submission via HaveYourSay website: Renewing the Australian Animal Welfare Strategy – Department of Agriculture, Fisheries and Forestry

Dear Australian Animal Welfare Strategy Team,

Re: Submission to Renewal of the Australian Animal Welfare Strategy

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers, 2,700 beef cattle producers and several hundred goat producers across the state, we work to secure a strong and sustainable livestock industry. South Australia's $4.3 billion livestock industry is a key economic contributor to the state and supports 21,000 South Australian jobs across the red meat and wool industries.

Livestock SA welcomes the opportunity to comment on the *Working Draft – Australian Animal Welfare Strategy: Have Your Say consultation draft* (AAWS).

Livestock SA supports the statement in the Executive Summary that animals' welfare, wellbeing and experiences matter and that animals should receive humane and responsible care. Livestock producers share this commitment and give effect to it every day through good husbandry and through established standards, assurance and training systems.

Summary of Livestock SA's position

Livestock SA welcomes the substantial alignment between the Working Draft and the issues raised in Livestock SA's previous submission to the renewal of the AAWS[1]. In particular, the Strategy's recognition of existing industry systems, nationally consistent standards, science and evidence, proportionality, practical considerations and the need to minimise duplication represents a positive direction.

Livestock SA supports a national animal welfare strategy that **strengthens coordination, promotes continuous improvement and builds Australia's animal welfare credentials without itself creating new regulatory, reporting, assurance or training requirements for producers**. The final AAWS should make clear that its goals, objectives and opportunities do not create new obligations, and that any future requirement will only be considered where a clear welfare gap is demonstrated, and

[1] Located at: Submission to the Renewal of the Australian Animal… | Livestock SA

will be evidence-based, proportionate to the welfare risk, developed with affected industries and progressed through established standards and regulatory processes.

Science and evidence should guide every part of the Strategy, including its priority areas, animal group chapters and public communication. Australia should also apply at home the same science- and evidence-based principles it promotes internationally. Implementation should build on existing industry systems, sustainability frameworks and voluntary training and assurance arrangements, rather than duplicate them. The Australian Animal Welfare Standards and Guidelines ('Guidelines') should remain the foundation for national consistency. The governance review should also preserve existing safeguards and the role of the Animal Welfare Task Group.

The final Strategy should also ensure First Nations engagement is relevant and proportionate, provide a clear framework for managing culturally significant animals such as dingoes where they affect livestock, clarify the scope of the research and teaching and working animal chapters, and strengthen chapter 11 by recognising the number of livestock managed on farms and industry leadership of quality assurance.

Adopting these recommendations would allow the renewed AAWS to add value to Australia's existing animal welfare system while supporting practical, science-based and continuously improving welfare outcomes across the livestock sector.

1. Distinguish strategic aspirations from enforceable obligations

Livestock SA recognises that the AAWS is a strategic framework rather than an animal welfare standard. However, the Strategy introduces broader concepts and policy expectations that are not currently reflected in the Guidelines, including governance, national monitoring and reporting, transparency, certification, positive welfare, First Nations engagement and technology enabled compliance.

The final Strategy should clearly distinguish strategic aspirations from enforceable obligations. As animal welfare regulation is the responsibility of state and territory governments, the Strategy should also confirm that any subsequent proposal affecting livestock production:

- will only be considered where a clear welfare gap has been demonstrated that existing systems cannot address;
- must be proportionate to the welfare risk and focused on outcomes rather than prescribed practices; and
- will be subject to the established standards development or regulatory process, including scientific assessment, meaningful industry consultation, regulatory impact analysis and consideration of practical and economic consequences.

The Executive Summary statement that animals' welfare, wellbeing and experiences matter, and concepts such as 'good lives', 'positive mental states' and 'wellbeing', express shared values that Livestock SA supports. However, these concepts are inherently subjective, difficult to measure objectively and may be interpreted differently by governments, markets, advocacy groups and the community. They should be understood as aspirations that guide continuous improvement, not as legal standards or a basis for new regulatory obligations. Otherwise, such language, and the Strategy's objectives more generally, risks becoming a de facto standard against which producers are assessed, for example through funding conditions, procurement or market access settings, or compliance and enforcement activity, without the scrutiny, cost-benefit analysis and consultation that formal regulation requires.

Recommendation 1 – *Overarching – applies to the Working Draft as a whole, including the Executive Summary and section 2 (Why animals matter to Australians)*

Livestock SA recommends that the AAWS expressly state that its goals, objectives and opportunities do not create new livestock welfare obligations or pre-approve changes to standards, regulation, reporting, auditing or assurance schemes, and that any such change be developed through a separate, evidence-based process with affected industries.

Aspirational concepts such as 'good lives' should guide continuous improvement, not serve as standards or compliance tests, and the Strategy's objectives should not be relied upon as de facto requirements through funding conditions, procurement or market access settings, or compliance and enforcement activity.

2. Science and evidence should underpin welfare decisions

Livestock SA considers that science and evidence should underpin how every priority area and animal group chapter of the Strategy is interpreted and implemented.

Community views and ethical preferences warrant transparent consideration, and livestock industries already respond to market and community expectations through their own sustainability frameworks and assurance programs. However, community views should not be presented as scientific findings or treated as proof that a particular intervention will improve welfare.

Livestock SA notes the Strategy's reference to the Five Domains Model as one of the frameworks that can inform animal welfare policy and practice, and Objective 2a's reference to policy processes being informed by 'relevant frameworks and concepts such as One Health and One Welfare'. Livestock SA supports the use of contemporary animal welfare science to inform policy. However, these frameworks and concepts should inform decision-making and standards development but should not, of themselves, create additional obligations for livestock producers (see also section 1). Any future proposal to incorporate a particular welfare framework into regulatory standards or compliance requirements should be considered through the established standards development process, including industry consultation and appropriate regulatory impact assessment.

Recommendation 2 – *Overarching – applies to the Working Draft as a whole*
Livestock SA recommends that the final AAWS apply science and evidence as the basis for interpreting every priority area and chapter, giving transparent consideration to community views and ethical preferences without presenting them as scientific findings.

3. Build on existing animal welfare systems and avoid duplication

Livestock SA strongly supports the Working Draft's recognition that Australia's livestock industries already operate within an extensive framework of animal welfare regulation, industry standards, quality assurance, certification, training, extension and research.

The Working Draft specifically recognises programs including Livestock Production Assurance (LPA), the National Feedlot Accreditation Scheme (NFAS) and the Australian Livestock Processing Industry Animal Welfare Certification System (AAWCS). It also acknowledges that livestock industries make significant investments in training, research, extension and continuous improvement.

This represents significant alignment with Livestock SA's previous submission, which cautioned against creating additional training and assurance requirements where rigorous industry systems are already in place.

This principle should be made clearer in the implementation of the Strategy. Existing regulatory, industry and assurance systems should be the starting point for any new reporting, training, assurance or certification initiative. Any such initiative should build on, rather than duplicate, these systems and the significant investment producers and industry have already made in them.

Recommendation 3 – *Overarching – Working Draft section 3 (Australia's animal welfare system) and chapter 11 (Livestock and production animals)*

Livestock SA recommends that the AAWS treat existing regulatory, industry and assurance systems as the starting point for any new livestock animal welfare reporting, training, assurance or certification initiative, and that any such initiative:

- builds on, rather than duplicates, existing systems such as LPA, NFAS and AAWCS;

- recognises the significant investment producers and industry have already made in these systems;

- considers implementation costs and practical implications for producers; and

- is developed in consultation with affected livestock industries.

4. Implementation and governance will be critical

The Working Draft appropriately recognises the different roles and responsibilities of governments, industries, organisations and individuals and proposes governance arrangements supported by stakeholder engagement and transparent decision-making.

The proposed governance review, due for completion and endorsement in early 2027, provides an important opportunity to clarify the institutional arrangements supporting implementation of the Strategy. Livestock SA supports governance arrangements that improve national coordination and timely decision-making.

Livestock SA is concerned that the proposal to establish governance arrangements under the Strategy may create an additional layer of national animal welfare governance without clearly identifying its relationship with existing structures. The Animal Welfare Task Group (AWTG) already coordinates national farm animal welfare regulatory matters and oversees the Guidelines framework.

Before establishing any additional governance structure, the Strategy should demonstrate the need for it, clearly delineate its functions from those of the AWTG and ensure that it does not duplicate existing processes or create alternative pathways for developing livestock welfare policy. Any governance arrangements affecting livestock should include appropriate industry representation and transparent decision-making and accountability mechanisms.

The existing national process for the Guidelines includes jurisdictional oversight through the AWTG, stakeholder consultation and Regulation Impact Analysis, with standards implemented through state and territory legislation. The governance review should build on these safeguards rather than bypass them in pursuit of streamlined or more rapid processes. Any changes, particularly those affecting the development or review of Guidelines, should not weaken the transparency, evidence requirements, regulatory scrutiny or stakeholder participation that currently underpin that process.

For Livestock SA, meaningful industry involvement in implementation will be critical.

Livestock SA acknowledges that industry and other stakeholders were consulted during the development of the *National Statement on Animal Welfare*. However, participation in consultation should not be interpreted as industry endorsement of all wording or future actions arising from the Statement. As the AAWS is developed and implemented, livestock industries should be meaningfully consulted on proposals that may affect production practices, standards, reporting or compliance requirements, with sufficient opportunity to consider their practical and regulatory implications.

Producers and livestock industry organisations bring practical knowledge of production systems and could be affected by measures arising from the Strategy. Industry participation should therefore occur before policy or implementation approaches are settled, rather than being limited to consultation on predetermined proposals.

Implementation should also be transparent about responsibility, costs and intended outcomes. If new measures are proposed, governments should demonstrate the problem being addressed, the evidence supporting intervention, why existing mechanisms are insufficient, expected animal welfare benefits and likely costs to affected parties.

The governance review should also clearly establish how scientific evidence, technical and producer expertise, community expectations and other advice will inform decisions, and how competing evidence or views will be resolved. It should maintain a clear distinction between minimum regulatory standards, voluntary guidelines and broader aspirational or best-practice welfare outcomes.

Recommendation 4 – *Working Draft section 4.1 – Priority area 1: leadership and coordination*

Livestock SA recommends that the governance review due in early 2027 explicitly examine and document the arrangements for developing, reviewing, endorsing and implementing the Australian Animal Welfare Standards and Guidelines, and that any revised model:

- **retains robust scientific and regulatory scrutiny, formal regulatory impact assessment, transparent consultation and decision-making, and appropriate jurisdictional and ministerial accountability;**
- **directly involves livestock producers and representative industry bodies early and throughout the development, implementation and evaluation of livestock-related actions and standards;**
- **clearly delineates the functions of any new governance structures so they do not duplicate the role of the AWTG or create alternative pathways for developing livestock welfare policy; and**
- **does not reduce these safeguards in pursuit of streamlined or faster standards development and adoption.**

5. Proportionate consideration of First Nations knowledge and engagement

Livestock SA supports the Strategy's recognition of First Nations peoples' deep cultural connections with animals and Country and the importance of appropriately considering First Nations knowledge, cultural practices and culturally significant animals in animal welfare policy.

Livestock SA supports appropriate consideration of First Nations knowledge and practices where relevant and shared with consent, including respect for Indigenous Cultural and Intellectual Property (ICIP).

Engagement and consideration should be proportionate to the subject matter and recognise that the relevance of First Nations knowledge and interests may differ across animal groups, policy issues and technical standards. Engagement should therefore be undertaken where there is a clear

connection to the matter under consideration, rather than applied as a uniform procedural requirement across all actions arising from the Strategy.

Recommendation 5 – *Working Draft section 4.1 – Priority area 1: leadership and coordination (Objective 1c: appropriate First Nations engagement)*

Livestock SA recommends that First Nations knowledge be considered under the AAWS where relevant, and that engagement be proportionate and appropriate to the matter being considered.

6. Maintain the Australian Animal Welfare Standards and Guidelines as the foundation for national consistency

Livestock SA supports the Working Draft's continued recognition of nationally consistent animal welfare standards and guidelines.

Our previous submission emphasised that the Guidelines provide a nationally endorsed and evidence-based foundation for livestock welfare regulation and cautioned that the introduction of alternative legislative frameworks would create unnecessary complexity and confusion. South Australia has already demonstrated this commitment, with regulations mandating the standards in the Cattle and Sheep Standards and Guidelines in operation since 15 April 2017.

The Livestock and Production Animals chapter identifies the role of the AWTG in developing Guidelines as the basis for nationally consistent welfare requirements and recognises the importance of streamlined development and adoption across jurisdictions.

Livestock SA welcomes the Strategy's proposed emphasis on practical, proportionate and evidence-informed approaches to animal welfare standards, including consideration of contemporary animal welfare science, costs and practicalities, and recognition of differing jurisdictional circumstances. These principles will be important to ensuring national approaches are both effective in improving animal welfare and workable across Australia's diverse livestock production systems.

National consistency should nevertheless mean more than developing Guidelines nationally. It should also encourage their timely and consistent adoption by jurisdictions, avoiding substantive differences that result in producers operating under different requirements depending on location.

Recommendation 6 – *Working Draft section 4.2 – Priority area 2: standards and implementation (Objective 2b)*

Livestock SA recommends that the AAWS retain the Australian Animal Welfare Standards and Guidelines as the principal mechanism for nationally consistent livestock welfare standards, with implementation focused on timely and harmonised adoption by jurisdictions to avoid different regulatory requirements and confusion for producers.

7. Better recognise existing industry sustainability frameworks and performance measures

Livestock SA welcomes the Working Draft's recognition of the role of industry guidelines, sustainability frameworks, assurance programs and existing animal welfare indicators.

Our previous submission specifically highlighted the Australian Beef Sustainability Framework, Sheep Sustainability Framework, Australian Wool Sustainability Scheme and South Australian Red Meat and Wool Blueprint 2030 as examples of industry-led frameworks already supporting and measuring

continuous improvement in livestock welfare. The Blueprint, for example, includes targets of 100% of South Australian livestock consistently experiencing welfare practices that meet the Australian Animal Welfare Standards and Guidelines, and 100% receiving appropriate analgesic and anaesthetic treatment during husbandry procedures. These frameworks are the appropriate mechanism for defining and measuring livestock welfare metrics and should be formally recognised in the renewed AAWS.

The Working Draft now recognises sustainability frameworks generally and proposes that existing statistical, performance, outcome, resource and compliance indicators may contribute to a stronger national understanding of animal welfare outcomes. Livestock SA supports this approach, including the qualification that existing indicators be used only where feasible and supported by relevant parties.

Consistent with sections 1 and 3, Priority area 3 should not of itself create new obligations for producers, and any reporting should build on, rather than duplicate, existing systems. Where livestock welfare data is used, it should have a clearly defined purpose, and commercially sensitive and confidential information should be appropriately protected.

Livestock SA also seeks clarification of what is intended by 'timely and transparent monitoring, reporting and compliance activities' in Objective 3b, including whether it is intended to create new obligations for producers.

Recommendation 7 – *Working Draft section 4.3 – Priority area 3: reporting and compliance (Objectives 3a, 3b and 3c)*

Consistent with Recommendations 1 and 3, Livestock SA recommends that the final AAWS formally recognise existing livestock sustainability frameworks, such as the Australian Beef Sustainability Framework, Sheep Sustainability Framework and South Australian Red Meat and Wool Blueprint 2030, as the primary source of livestock welfare metrics; protect commercially sensitive and confidential information; and clarify what is intended by 'timely and transparent monitoring, reporting and compliance activities' in Objective 3b.

8. Coordinate research while recognising industry priority setting and species-specific needs

Livestock SA strongly supports the Working Draft's focus on better coordination of animal welfare research and reducing duplication.

Our previous submission highlighted the role already played by industry research and development arrangements, including Meat and Livestock Australia and South Australian industry priority setting mechanisms, in identifying and funding targeted research. It supported aligning research across species where appropriate, while cautioning that livestock welfare research can be inherently species-specific.

The Working Draft substantially reflects this position. Priority area 4 proposes a coordinated approach which builds on industry investment, including through Research and Development Corporations, while the Livestock and Production Animals chapter proposes coordinated research that builds on existing industry activity and improves pathways between research and adoption. The Strategy also recognises the importance of species-specific approaches.

Livestock SA supports this approach.

Recommendation 8 – *Working Draft section 4.4 – Priority area 4: research and development*

Livestock SA recommends that AAWS research coordination build on existing industry and Research and Development Corporation priority setting and investment processes, with new national research initiatives targeted at demonstrated gaps and recognising where species-specific research is scientifically necessary.

9. Training and capability building should recognise existing producer competency

Livestock SA supports education, training and extension where they contribute meaningfully to improved animal welfare outcomes.

The Working Draft appropriately identifies industry quality assurance and awareness programs as mechanisms for maintaining appropriate animal welfare knowledge and skills.

Consistent with sections 1 and 3, Objective 5b should not of itself create new training, accreditation or competency obligations for producers. Any additional training, education or awareness initiatives should remain voluntary, particularly where existing programs already provide appropriate assurance.

Recommendation 9 – *Working Draft section 4.5 – Priority area 5: education and communication (Objective 5b)*

Consistent with Recommendations 1 and 3, Livestock SA recommends that the final AAWS confirm that Objective 5b does not of itself create new training, accreditation or competency requirements for producers, and that any additional training, education or awareness initiatives remain voluntary.

10. Public communication should be balanced, accurate and evidence-based

Livestock SA supports the objective of improving public understanding of animal welfare and showcasing positive animal welfare outcomes.

Our previous submission highlighted the importance of ensuring that information presented to the public is accurate, balanced and evidence-based, particularly given the potential for incomplete or misleading representations of livestock production to influence community perceptions.

The Working Draft substantially responds to this concern through its emphasis on science- and evidence-based communication. Priority area 5 seeks to make evidence-based animal welfare information accessible and improve public understanding of good animal welfare, while the Livestock and Production Animals chapter specifically identifies opportunities to improve transparency and consumer engagement about animal welfare practices throughout the supply chain.

Recommendation 10 – *Working Draft section 4.5 – Priority area 5: education and communication (Objectives 5a and 5c)*

Livestock SA recommends that communication undertaken through the AAWS be science- and evidence-based, provide appropriate production system context, and recognise demonstrated improvements and existing industry achievements.

11. Apply international animal welfare principles consistently at home

In relation to section 4.6 (Priority area 6: international engagement) of the Working Draft, Livestock SA supports Australia advocating internationally for science- and evidence-based animal welfare standards that recognise Australian production systems and conditions. These principles should be applied consistently domestically. The phase-out of live sheep exports by sea highlights the importance of ensuring major animal welfare decisions give appropriate weight to science, evidence, practical impacts and outcomes-based alternatives before prohibitive measures are adopted.

Recommendation 11 – *Working Draft section 4.6 – Priority area 6: international engagement*

Livestock SA recommends that the AAWS commit governments to applying the same science- and evidence-based, outcomes-focused principles promoted internationally when developing domestic animal welfare policy, including consideration of practical impacts and proportionate regulatory alternatives before prohibitive measures are pursued.

12. Manage competing objectives where culturally significant animals affect livestock

The Strategy should expressly recognise that circumstances may arise where the cultural significance or protection of an animal intersects with the need to protect other animals, agricultural production, biosecurity and rural livelihoods.

This is particularly relevant to the management of dingoes and wild dogs. While dingoes may have cultural significance to First Nations peoples, wild canids can also have significant impacts on livestock, including through predation and injury to sheep and other livestock. The Strategy already acknowledges more generally that management of animals in the wild can involve competing animal welfare, environmental, human and industry considerations, and recognises humane lethal control as one management response where wild animals have adverse impacts on industries and other animals.

Livestock SA considers that the Strategy should provide a clearer framework for dealing with these potentially competing objectives. Recognition of cultural significance should not, of itself, unintentionally constrain necessary and evidence-based pest animal management or compromise the welfare of livestock that producers have a responsibility to protect.

Rather, management approaches should be developed through respectful engagement with First Nations communities, livestock producers and other affected stakeholders and should take account of cultural significance, animal welfare, livestock predation and injury, biosecurity, environmental outcomes and the practical realities of agricultural production.

The Strategy should recognise that livestock producers' responsibility for the welfare of animals in their care must be supported by effective management of external threats. Wild dogs and other pest animals can cause significant injury, mortality and distress to livestock, and these risks cannot always be controlled at the individual property level. Animal welfare policy should therefore support effective, coordinated and practical pest animal management and should not constrain reasonable control measures necessary to protect farmed animals.

Recommendation 12 – *Working Draft chapter 6 (Animals in the wild) and chapter 11 (Livestock and production animals)*

Livestock SA recommends that the AAWS include a clear framework, developed with First Nations communities and affected livestock industries, for managing circumstances where culturally significant animals, including dingoes, adversely affect livestock welfare, biosecurity or agricultural production, so that effective, evidence-based and humane wild dog management to protect livestock is not prevented.

13. Clarify the scope of research and teaching provisions

In relation to chapter 7 (Animals involved in research and teaching) of the Working Draft, Livestock SA understands that references to breeding, supply, import and export, overbreeding, rehoming, colony management and genetic welfare relate specifically to animals bred, supplied or managed for research purposes. The Strategy should make this scope explicit to avoid any interpretation that these provisions apply to commercial livestock breeding and production.

Livestock SA supports improved transparency in relation to animals used in research and teaching, provided any national reporting framework draws on existing regulatory and institutional data, applies consistent definitions and avoids creating duplicative reporting requirements. Data should be appropriately contextualised to ensure livestock used in research or teaching are not conflated with animals in commercial production.

Recommendation 13 – *Working Draft chapter 7 – Animals involved in research and teaching*

Livestock SA recommends that the final AAWS state that chapter 7 provisions on breeding, supply, rehoming, colony management and genetic welfare apply only to research and teaching animals, not commercial livestock, and that any reporting framework for research animals draws on existing data and clearly distinguishes them from commercial production.

14. Proportionate requirements for farm working animals

In relation to chapter 8 (Animals involved in work, sport and recreation) of the Working Draft, Livestock SA supports the chapter's recognition that animal welfare requirements should be science- and evidence-based and take account of regulatory burden and practical implications. Working stock dogs, stock horses and livestock guardian animals operate in substantially different contexts from racing, entertainment and other animals covered by this chapter. Whole-of-life monitoring, traceability, data collection and other requirements should therefore be proportionate to the activity and demonstrated welfare risk and should not impose additional requirements on farm working animals where existing arrangements are appropriate.

Livestock SA supports greater national consistency where this improves animal welfare outcomes, while recognising that requirements must remain appropriate to the animal's role, operating environment and welfare risk. National consistency should not result in uniform requirements across fundamentally different work, sport and recreational contexts.

Recommendation 14 – *Working Draft chapter 8 – Animals involved in work, sport and recreation*

Livestock SA recommends that measures developed under chapter 8 of the AAWS recognise the different roles, operating environments and risk profiles of animals used in work, sport and recreation, and that any monitoring, traceability or reporting requirements are evidence-based, proportionate and do not create unnecessary regulatory burden.

15. Livestock and production animals: build on existing systems

In relation to chapter 11 (Livestock and production animals) of the Working Draft, Livestock SA recommends that section 11.2 recognise the number of livestock managed by Australian farmers, rather than relying predominantly on annual numbers processed for meat. Livestock producers have an ongoing responsibility for animal welfare throughout the period animals are in their care, which may extend over many years for breeding and production animals. Population figures therefore provide important context on the scale and duration of animal welfare management undertaken by producers. Processing figures may also be relevant, but they measure annual throughput rather than the number of animals being managed within livestock production systems.

Chapter 11 recognises the AWTG as the national government forum for farm animal welfare and the development of the Guidelines. Livestock SA's concerns about how any new AAWS governance arrangements will interact with the AWTG are set out in section 4 (see Recommendation 4).

Livestock SA supports consideration of First Nations knowledge and experience where relevant and appropriately shared. The Strategy should clarify what is intended by 'culturally informed approaches' to livestock production and animal welfare and ensure their application is relevant, proportionate and developed with affected stakeholders (see also section 5).

In relation to the chapter 11 opportunity for 'improved transparency and consumer engagement about animal welfare practices throughout the supply chain, including welfare certification schemes' (Objectives 3a, 5c and 6a), Livestock SA supports accurate, science- and evidence-based communication with consumers that builds on existing industry assurance, sustainability and regulatory frameworks and datasets, with appropriate protections for commercial confidentiality, privacy and data governance (see sections 7 and 10).

Chapter 11 also proposes the 'integration of animal welfare into existing livestock and production industry quality assurance and certification programs'. Livestock SA supports effective industry assurance programs, but any proposal to integrate additional animal welfare requirements into existing schemes should be industry-led and subject to separate consultation (see also sections 1 and 3).

Recommendation 15 – *Working Draft chapter 11 – Livestock and production animals*

Consistent with Recommendations 1 and 3, Livestock SA recommends that the final chapter 11: report the number of livestock managed on farms, not only numbers processed; clarify what is intended by 'culturally informed approaches'; and confirm that any integration of animal welfare into existing quality assurance and certification programs is industry-led and subject to separate consultation.

Conclusion

Livestock SA supports the renewal of the AAWS and welcomes the progress reflected in the Working Draft. With the clarifications sought in Recommendations 1 to 15, the renewed Strategy can strengthen national coordination and Australia's animal welfare credentials while building on the systems that livestock producers already rely on every day.

Livestock SA would welcome the opportunity to continue working with the Department on the final Strategy and its implementation.

Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.com.au if you would like to discuss this submission further.

Yours sincerely

Travis Tobin
Chief Executive Officer