

[Received by email]

Lake Edward,
Crookwell NSW 2583

19/9/2007

On behalf of the Australian Beef Association I attach our comments on the National Livestock Identification Scheme (NLIS) section of your Draft Annual Review of Regulatory Burdens on Business: Primary Sector.

We appreciate that you have highlighted our concerns but take issue with your lack of questioning of some statements by the protagonists of the NLIS facade- Specifically-

1. *Australia's status as "disease free" provides a crucial competitive advantage into high value markets in Japan, USA and Korea (together near 90% of beef exports in 2005-06).*

This claim has been cut to ribbons by Minister Vaile's side letter to the US Free Trade Agreement and the subsequent move by the USA back into Japan and Korea despite them having BSE, imports from Canada with more BSE and no NLIS at all.

2. Cowcatcher II.

The conclusions of the report are politically correct but flawed as we illustrate in the rarely read 'Recommendations'—see our comments on some of the findings below. This is similar to the PWC Report which was accurate but covered by conclusions that did not match the findings.

Cowcatcher II -Exercise Review

A number of recommendations/issues were listed by this group as requiring attention, these being:

- Property-to-property (P2P) transfers of NLIS device numbers are required to be maintained in order to ensure traceability. These movements are by the most susceptible transfer to be overlooked. There needs to be a system put in place that ensures P2P transfers are undertaken as a priority. What sort of commercial drivers can be implemented to ensure that P2P transfers are maintained? *This is being bypassed everywhere—is a farce—as has been identified by the UK Accounts Committee report of 2003. Canada's chief of their system told me that they wouldn't even try this path. Human nature will ensure bypassing or ignoring as is currently being demonstrated by the continuing movement of horses despite an official freeze on movements.*
- There is a need to ensure that all NLIS species programs correlate the NLIS identifier to the carcass to a point where the disposition of the carcass is decided. By ensuring this, traceability for food safety issues is maintained. *This is just not happening, abattoirs are often not even taking the killed cattle off the database—ABA members have thousands of cattle sold that have gone into thin air when they go into their accounts..*
- That Standard 2.2 of the National Traceability Performance Standards is reworded to include the wording "moved off" rather than "lived on".

- All states should have access to, and the ability to effectively use, an NLIS mirrored database. This should be integrated into jurisdictional tracing standard operating procedures (SOPs). Some states relied on MLA to provide reports into the mirror systems to allow them to use the mirrors to complete the exercise. It is the responsibility of the jurisdictions to develop their own reports and not rely on MLA to provide this information. *This illustrates that the authors recognise what everyone that has gone into his account knows—that the current database is hopelessly flawed .A move to State based databases will meet cost problems from State Treasuries and staffing problems.*
- All relevant AUSVETPLANS should be reviewed to include the use of NLIS in the control and eradication of the nominated disease/s.
- There is a strong need for the development of SOPs for the tracing of animals during disease events. These SOPs need to be consistent across all jurisdictions providing a nationally consistent approach.

Exercise Cowcatcher II Report 16

- All jurisdictions need to maintain up-to-date property identification code (PIC) registers as these registers form the basis of the NLIS-C database.
- There is a need to ensure that there is a commitment to the provision of training of staff in the use and interpretation of information from the relevant databases used for tracing.
- There is a need to define MLA's roles and responsibilities in the provision of information and resources for tracing animals during a disease outbreak.
- The reporting of tracing results needs to be reported in a standardised national format. This is particularly important when providing cross-border movement data to Disease Headquarters.
- From an exercise management perspective, liveTRACE™ software proved to be an effective tracing tool. liveTRACE™ was developed by the Victorian Department of Primary Industries and has proven to be a powerful analytical tool that shows promise for epidemiological investigations. The use of these types of tools would greatly enhance Australia's capabilities in the event of an EAD. An example of the reports can be seen in Appendix 2.
- MLA needs to develop an emergency management plan for use during cases of disease events (e.g. timing of mirror database synchronisation). This plan needs to link to jurisdictional SOPs. *This conflicts with the earlier suggestion of a move to State based databases.*
- Industry and jurisdictions need to continue to educate producers and other members of the beef production chain on the benefits of NLIS-C.

Crazy, ivory tower talk—this is costing producers a lot of money as the US goes back into Japan/Korea with no NILS and our prices crash as our costs multiply.

- It is apparent from the results of the exercise that jurisdictions need to continue monitoring, compliance and enforcement of NLIS-C use and supporting legislation.

Roll out 2000 bureaucrats to equate to the UK disaster—their system appears to be powerless as FMD spreads.

Participant Debrief

A number of common issues were listed by the participants as requiring attention. These were grouped into the two areas:

Evaluation of the Tracing Task

In summary, the jurisdictions identified a number of common issues experienced during the exercise. All of the issues, as expected, relate to operational issues/difficulties experienced during the event. The issues are:

- The need for IT support – as the exercise was largely an exercise of tracing livestock utilising the NLIS database as a tool, jurisdictions were reliant on IT support. Some states did experience the near disastrous IT failures/collapses that will only occur during times of urgency and did not have the technical backup to proceed.
- The lack of staff was seen to be limiting the tracing response in some jurisdictions. *Roll out the 2000 needed!*
- Some jurisdictions set up the equivalent of a local disease control centre (LDCC) in order to provide additional experience to staff. Those jurisdictions that did not implement this structure believed that they would in future as it provides important training to the staff involved.

Exercise Cowcatcher II Report 17

- All jurisdictions identified the need for standardising the methodologies and reporting of those animals that are traced across jurisdictional boundaries. The jurisdictions reported in their usual standard format thus providing seven different reporting templates all with various levels of complexity whilst not providing the same data. With the use of the NLIS-C database, states are now able to identify movements irrespective of where in Australia it occurred (i.e. an animal requiring primary tracing in NSW may have been born in SA and due to the animals LT status, NSW can identify all movements that have taken place in SA). In the old paper tracing system, this could not have occurred.
- Following on from the point above, it is therefore essential to maintain a consistency in terminology and definitions. Jurisdictions use different words for the labelling of animal types, performance of traces, describing their actions. This adds to the complication of an event when discussions are held at a national level.
- The exercise has highlighted the need for ongoing efforts to be put towards compliance enforcement of all database users. This is a jurisdictional responsibility and needs to be done on a day to day, week to week, monthly basis depending on the sector/user being monitored. *Roll out the 2000 . \$69 / per head sold –paid for by whom?-there are already cattle selling for under \$69!*

- It can be said that those jurisdictions that do not have a mirrored database are unclear of what information needs to be extracted from the database and the time frames they require the information in.
- This is more critical to those states dependant on MLA as they have not implemented a mirror based system.

Evaluation of the Exercise and its Planning/Execution

The jurisdictions identified a number of common issues experienced during the exercise. Below is a summary of the agreed issues:

- Staff training focusing on the use of the numerous databases is essential. This will need to be split into two areas; the intrastate databases (i.e. PIC registers, land database) and the national database (i.e. NLIS-C database – mirrored or actual).
- Document control in the lead up to the exercise was poor. Correction of this will help prevent confusion of the participants.
- The incorporation of a debrief for all participants after 24 hrs would be beneficial. This would provide an opportunity to clarify issues as events unfold.
- All jurisdictions identified the fact that communications with the NLIS-C database and its staff was nothing short of “great”.
- It needs to be noted that this type of exercise is different to an EAD event in that an EAD event would have a small number of target animals with different levels of cohorts involved (i.e. primary, secondary level). This exercise had the equivalent to 300 target animals.

ABA remains even more committed to bringing this farcical facade to an end. Rarely a day goes by without an ABA Director or the Office having calls from angry producers who are charged up to \$40 for having a lost tag replaced in the saleyards, discounted because of incorrect database information, the few that go into their Database account invariably find up to 50% error rate , others have been harassed by a rare officer as they try to move stock in the drought.

We repeat our original claims with vigour.

- **RFID NLIS to a database has not been made to work in any beef producing country.**
- **Australia is currently pretending to operate a hopelessly flawed system with “wink wink, don’t worry” as the password. Like the failed OJD elimination program, it has Governments trying to avoid the huge expense of regulating to make it work.**
- **In the event of an exotic disease outbreak the system will not provide trace-back as the database has little relationship to the location of the cattle. The original draft legislation required all tags from dead animals to be accounted for, this was dropped from the actual Legislation as it was clearly impractical and the scheme immediately became flawed.**
- **The cost to producers will continue to escalate –all for no additional return.**

- **We recommend a return to the previous, world leading, tail tag system.**

We seek your assistance with a fearless summation of the mess.

Yours Sincerely

[signed]

John Carter for Australian Beef Association.