



Our ref: eA200006  
Obj ID: A6015706  
Receipt No: 18307227

The Hon Clare Scriven MLC

The Hon Nicola Centofanti MLC  
Member of the Legislative Council  
Parliament House  
ADELAIDE SA 5000

Dear Ms Centofanti *Nicola,*

**Determination under the *Freedom of Information Act 1991***

I refer to your application made under the *Freedom of Information Act 1991* received by the Office of the Minister for Primary Industries and Regional Development and the Office of the Minister for Forest Industries on 13 September 2023 requesting access to the following:

*“A copy of all correspondence and meeting documents including but not limited to hard copy or electronic briefings, minutes, emails, letters, meeting agendas, and any other correspondence to and from the Minister for Primary Industries and Regional Development regarding sheep and goat electronic identification between 25/02/2023 and 13/09/2023.”*

Accordingly, the following determination has been finalised.

I have located twenty-five documents that are captured within the scope of your request.

**Determination 1**

I have determined that access to the following documents is **granted in full**:

Doc No.	Description of document	No. of Pages
1	Email from Office of the Minister for Primary Industries and Regional Development to President of Livestock SA dated 03/03/2023 encl letter re the Implementation of Sheep and Goat eID	2
4	Email from Duan Williams to Minister for Primary Industries and Regional Development dated 18/05/2023 re Sheep and Goat eID mandate	1
5	Email from Duan Williams to Minister for Primary Industries and Regional Development dated 10/07/2023 encl letter re eID mandate for sheep	9
5b	Minute from Chief Executive, Department of Primary Industries and Regions to Minister for Primary Industries and Regional	4

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email minister.scriven@sa.gov.au



**OFFICIAL**

	Development dated 25/07/2023 re Sheep and Goat ID tagging exemptions	
6	Email from Office of the Member for Frome to Minister for Primary Industries and Regional Development dated 25/05/2023 encl letter re implementation of eID tags	2
6a	Email from Office of the Minister for Primary Industries and Regional Development to Member for Frome dated 24/07/2023 encl letter re transition to mandate sheep and goat eID in South Australia	3
7	Email from Duan Williams to Minister for Primary Industries and Regional Development dated 01/06/2023 encl eID Minority Report	66
7b	Minute from Chief Executive, Department of Primary Industries and Regions to Minister for Primary Industries and Regional Development dated 04/07/2023 re Minority Report, Sheep and Goat eID	3
8	Email from Naracoorte Lucindale Council to Minister for Primary Industries and Regional Development dated 02/06/2023 encl letter re sheep eID implementation and funding	3
8a	Email from Office of the Minister for Primary Industries and Regional Development to Naracoorte Lucindale Council dated 26/07/2023 encl letter re implementation of sheep and goat eID in South Australia	3
9	Email from Duan Williams to Office of the Minister for Primary Industries and Regional Development dated 12/09/2023 re livestock traceability and sheep eID	9
11	Calendar Meeting between Minister Sciven and Livestock SA dated 22/05/2023	1
12	Calendar Meeting between Minister Sciven and Livestock SA dated 05/06/2023	1
13	Calendar Meeting between Minister Sciven and Livestock SA dated 06/06/2023	1

**Determination 2**

I have determined that access to the following documents is **granted in part**:

Doc No.	Description of document	No. of Pages
3	Email to Office of the Minister for Primary Industries and Regional Development dated 06/06/2023 re mandatory eID tags in South Australia	1
3a	Email from Office of the Minister for Primary Industries and Regional Development dated 23/08/2023 encl letter re mandatory eID tagging	2
4a	Email from Office of the Minister for Primary Industries and Regional Development to Duan Williams dated 16/06/2023 encl letter re eID tagging exemptions	3
5a	Email from Office of the Minister for Primary Industries and Regional Development to Duan Williams dated 18/08/2023 encl letter re eID mandate for sheep	2
7a	Email from Office of the Minister for Primary Industries and Regional Development to Duan Williams dated 27/07/2023 encl letter re Minority Report	3
10	Letters from Minister for Primary Industries and Regional Development to Livestock National Organisations dated 03/07/2023 re 2023-2024 State Budget implementation of eID	13

The information removed from the above documents is pursuant to Clause 6(1) of Schedule 1 of the Freedom of Information Act which states:

**“6 - Documents affecting personal affairs**

*(1) A document is an exempt document if it contains matter the disclosure of which would involve the unreasonable disclosure of information concerning the personal affairs of any person (living or dead).”*

The information removed consists of the following:

- Documents 3 and 3a: Names of individuals, private email and residential addresses, mobile telephone numbers
- Document 4a, 5a and 7a: Residential address of an individual
- Document 10: Email addresses of associations

Accordingly, it is considered that disclosure of this information would be an unreasonable intrusion into the privacy rights of the individuals concerned.

**Determination 3**

I have determined that access to the following document is **granted in part**:

<b>Doc No.</b>	<b>Description of document</b>	<b>No. of Pages</b>
3b	Minute from Chief Executive, Department of Primary Industries and Regions to Minister for Primary Industries and Regional Development dated 18/05/2023 re mandatory eID tagging	4

The information removed from the above document is pursuant to Clause 1(1)(e), Clause 6(1) and Clause 9(1) of Schedule 1 of the Freedom of Information Act.

Clause 1(1)(e) states:

**“1 – Cabinet documents**

*(1) A document is an exempt document –*

*(e) if it contains matter the disclosure of which would disclose information concerning any deliberation or decision of Cabinet;”*

Disclosure of this information would reveal detail of a matter considered in Cabinet.

The information removed pursuant to Clause 6(1) consists of the names of individuals.

It is considered that members of the public can correspond with a Minister without fear that their identities are released.

Accordingly, it is considered that disclosure of this information would be an unreasonable intrusion into the privacy rights of the individuals concerned.

Clause 9(1) states:

**“9—Internal working documents**

(1) A document is an exempt document if it contains matter—

(a) that relates to -

(i) any opinion, advice or recommendation that has been obtained, prepared or recorded; or

(ii) any consultation or deliberation that has taken place, in the course of, or for the purpose of, the decision-making functions of the Government, a Minister or an agency; and

(b) the disclosure of which would, on balance, be contrary to the public interest.”

The information removed consists of detail prepared for the consideration of a Minister and is considered as internal working documentation.

In addressing the public interest test for the Clause 9(1) exemption, I have balanced the following factors:

*In favour of the public interest:*

- Meeting the objects of the Act favouring access to documents.
- Ensuring optimal use of public resources.
- High level of interest in the accountability of public office holders.
- The importance of transparency and openness and the interest that the public has in the decision-making processes of Government.

*Contrary to the public interest:*

- The recent age of the information was considered and the continuing relevance of the matters.
- Confidentiality of such matters must be maintained for internal decision-making purposes.
- The likelihood that disclosure could inhibit open discussion when submitting documents to a Minister for consideration.
- The possibility that disclosure could adversely affect the efficient administration of an agency.
- The amount of information that is not already publicly available.
- Protection of the deliberative processes of Government.
- Disclosure of this information may compromise the manner in which information is communicated and gathered for the decision-making processes of Government. If such processes were unable to be undertaken without fear of release, this would jeopardise the way in which the Government seeks input for decision-making purposes.

Having considered the various factors weighing for and against disclosure, I have determined that disclosure of this information would, on balance, be contrary to the public interest.

**Determination 4**

I have determined that access to the following document is **granted in part**:

<b>Doc No.</b>	<b>Description of document</b>	<b>No. of Pages</b>
4b	Minute from Chief Executive, Department of Primary Industries and Regions to Minister for Primary Industries and Regional Development dated 31/05/2023 re eID tagging exemption	5
6b	Minute from Chief Executive, Department of Primary Industries and Regions to Minister for Primary Industries and Regional Development dated 25/07/2023 re National mandatory introduction	5
8b	Minute from Chief Executive, Department of Primary Industries and Regions to Minister for Primary Industries and Regional Development dated 21/06/2023 re funding for eID implementation	4

The information removed from the above document is pursuant to Clause 9(1) Schedule 1 of the Freedom of Information Act.

The information removed consists of detail prepared for the consideration of a Minister and is considered as internal working documentation.

In addressing the public interest test for the Clause 9 exemption, I have balanced the following factors:

*In favour of the public interest:*

- Meeting the objects of the Act favouring access to documents.
- Ensuring optimal use of public resources.
- High level of interest in the accountability of public office holders.
- The importance of transparency and openness and the interest that the public has in the decision-making processes of Government.

*Contrary to the public interest:*

- The recent age of the information was considered and the continuing relevance of the matters.
- Confidentiality of such matters must be maintained for internal decision-making purposes.
- The likelihood that disclosure could inhibit open discussion when submitting documents to a Minister for consideration.
- The possibility that disclosure could adversely affect the efficient administration of an agency.
- The amount of information that is not already publicly available.
- Protection of the deliberative processes of Government.
- Disclosure of this information may compromise the manner in which information is communicated and gathered for the decision-making processes of Government. If such processes were unable to be undertaken without fear of release, this would jeopardise the way in which the Government seeks input for decision-making purposes.

Having considered the various factors weighing for and against disclosure, I have determined that disclosure of this information would, on balance, be contrary to the public interest.

**Determination 5**

I have determined that access to the following document is **refused**:

Doc No.	Description of document	No. of Pages
2	Minute from Chief Executive, Department of Primary Industries and Regions to Minister for Primary Industries and Regional Development dated 19/07/2023 re Sheep and Goat eID	6

Access to the above document is refused pursuant to Clause 9(1) of Schedule 1 of the Freedom of Information Act.

The document consists of a briefing prepared for the consideration of a Minister and is considered as an internal working document.

In addressing the public interest test for the Clause 9(1) exemption, I have balanced the following factors:

*In favour of the public interest:*

- Meeting the objects of the Act favouring access to documents.
- Ensuring optimal use of public resources.
- High level of interest in the accountability of public office holders.
- The importance of transparency and openness and the interest that the public has in the decision-making processes of Government.

*Contrary to the public interest:*

- The recent age of the information was considered and the continuing relevance of the matters.
- Confidentiality of such matters must be maintained for internal decision-making purposes.
- The likelihood that disclosure could inhibit open discussion when submitting documents to a Minister for consideration.
- The possibility that disclosure could adversely affect the efficient administration of an agency.
- Disclosure of this information may compromise the manner in which information is communicated and gathered for the decision-making processes of Government. If such processes were unable to be undertaken without fear of release, this would jeopardise the way in which the Government seeks input for decision-making purposes.

Having considered the various factors weighing for and against disclosure, I have determined that disclosure of this document would, on balance, be contrary to the public interest.

If you are unhappy with this determination you are entitled to exercise your rights of external review with the Ombudsman SA. Alternatively, you can apply to the South Australian Civil and Administrative Tribunal (SACAT). If you wish to seek a review, you must do so within 30 calendar days of receiving this determination.

For more information about seeking a review or appeal, please contact the Ombudsman SA on telephone (08) 8226 8699 or SACAT on 1800 723 767.

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In accordance with the requirements of Premier and Cabinet Circular PC045, details of your application, and the documents to which you are given access, will be published in PIRSA's disclosure log. A copy of PC045 can be found at [http://dpc.sa.gov.au/data/assets/pdf\\_file/0019/20818/PC045-Disclosure-Log-Policy.pdf](http://dpc.sa.gov.au/data/assets/pdf_file/0019/20818/PC045-Disclosure-Log-Policy.pdf)

If you disagree with publication, please advise the undersigned in writing within fourteen calendar days from the date of this determination.

Should you require further information or clarification with respect to this matter, please contact Ms Rachael Colegate on 8226 2931 or email: [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au).

Yours sincerely



Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

13/11/2023

**Gonos, Anthea (PIRSA)**

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**From:** PIRSA:Minister Scriven  
**Sent:** Friday, 3 March 2023 4:54 PM  
**To:** admin@livestocksa.org.au  
**Subject:** eA198976 - Minister Scriven Correspondence  
**Attachments:** eA198976 - Mr Joe Keynes - Implementing Sheep and Goat eID.pdf

**OFFICIAL**

Document ID: eA198976

Good afternoon

Please find attached correspondence from Minister Scriven regarding the Implementation of Sheep and Goat eID

Kind regards

**Office of the Hon Clare Scriven MLC**

**Minister for Primary Industries and Regional Development**

**Minister for Forest Industries**

Government of South Australia | 1 King William Street, Adelaide

GPO Box 1671 Adelaide SA 5001

**T:** +61 8226 2931 | **E:** [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au)

[pir.sa.gov.au](http://pir.sa.gov.au)



Government of South Australia  
Department of Primary Industries  
and Regions

Artwork by Ngarrindjeri artist Jordan Lovegrove.

*The Department of Primary Industries and Regions respects Aboriginal people as the state's first people and nations. We recognise Aboriginal people as traditional owners and occupants of South Australian land and waters. We pay our respects to Aboriginal cultures and to Elders past, present and emerging.*

Disclaimer: The information in this email may be confidential and/or legally privileged. Use or disclosure of the information by anyone other than the intended recipient is prohibited and may be unlawful.





Mr Joe Keynes  
President  
Livestock SA  
Unit 5, 780 South Road  
GLANDORE SA 5037

Email: [admin@livestocksa.org.au](mailto:admin@livestocksa.org.au)

Dear Mr Keynes *Joe,*

I write to you about the important work underway to implement an individual electronic identification (eID) system for sheep and goats in South Australia.

Thank you for the progress to date through the \$140,000 funding agreement provided to Livestock SA to support the Livestock SA Sheep and Goat Traceability Steering Committee.

I thank the Committee for delivering its first phase of the agreement in producing a business case report estimating the costs for each sector in the supply chain associated with implementing eID.

I am advised PIRSA received the final report on 17 February 2023 and departmental staff are now working through that information.

I note the Committee has moved to its next phase of work to develop an implementation and communication plan identifying the steps industry will need to take to implement sheep and goat eID in the State, and that this work is due to be completed by June 2023. This next phase will consider timeframes and how resources will be deployed to achieve a smooth transition utilising reliable technology.

I have also requested that PIRSA review and develop regulatory and policy tools and consider technical and project resources necessary in preparation for the target date for the introduction of an eID system, that as you would be aware, has been set for 1 January 2025.

It is important to me that implementation of sheep and goat eID is supported by industry, understanding that government plays a key role in providing an effective policy and regulatory platform.

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)



I look forward to continuing the partnership between the South Australian Government, PIRSA and the sheep and goat industries, in implementing the eID system in our state as smoothly as possible to improve traceability and enhance our biosecurity, to meet the demands of our trading partners and protect our livestock industries from the impacts of emergency animal diseases.

Yours sincerely



Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

313 / 2022

**Gonos, Anthea (PIRSA)**

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**From:** Clause 6(1)  
**Sent:** Tuesday, 6 June 2023 8:36 AM  
**To:** PIRSA:Minister Scriven  
**Cc:** centofanti.office@parliament.sa.gov.au  
**Subject:** FW: mandatory EID tagging

**Categories:** Corro - General

You don't often get email from linesgumhill@bigpond.com. [Learn why this is important](#)

**From:** Clause 6(1)  
**Sent:** Tuesday, May 2, 2023 5:49 PM  
**To:** 'minister.scriven@sa.gov.au' <minister.scriven@sa.gov.au>  
**Subject:** mandatory EID tagging

To the honourable minister

I write this with concern as to how the roll out of mandatory EID tags for sheep and goats in South Australia is being handled .

First some background on myself and our business

We are a Poll Merino sheep stud based in the Mid North of the state and have been operating as a family business in excess of 100 years .Currently we service around 120 customers a year supplying them with Poll Merino Rams to breed progeny from .

We ourselves run in excess of 6000 sheep on farm at any one time all of which are electronically tagged and have been for approximately 9 years .

Recently we have been fielding calls from customers on a regular basis asking us about the mandatory EID situation

.As most of our client base choose to lamb ewes in the autumn this issue is becoming more urgent .The concern I have is that if no direction is given urgently then the opportunity to tag the current drop of lambs will be lost

.Feedback we are getting is not so much how it will work but will it be subsidised? The current cost of non-EID tags is around 20-40cents and EID tags are closer to \$2.00 it will be a significant cost to producers.

As I see it, a simple yes it will be subsidised will encourage producers to act now and start implementing a programme OR a message declaring no subsidisation will give certainty allowing producers to work the additional cost into their Budgets Uncertainty will result in a lost year and increased pressure on supply of tags next year . It was great to see the WA government commit another 22+million to the industry and this decisive decision has led to over 400,000 tags being delivered this year so far.

I encourage you to make a decision NOW so that the SA industry can act and not be left behind

Kind regards

Clause 6(1)

**Gonos, Anthea (PIRSA)**

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**From:** PIRSA:Minister Scriven  
**Sent:** Wednesday, 23 August 2023 11:01 AM  
**To:** Clause 6(1)  
**Subject:** eA199293 - Minister Scriven Correspondence  
**Attachments:** eA199293 - Clause 6(1) - Mandatory EID Tagging 23082023.pdf  
**Categories:** For Noting Very Important

Document ID: eA199293

Dear Mr and Mrs Clause 6(1)

Please find attached correspondence from Minister Scriven dated 22 August 2023.

Kind regards

**Office of the Hon Clare Scriven MLC**  
**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**  
Government of South Australia | 1 King William Street, Adelaide  
GPO Box 1671 Adelaide SA 5001  
**T:** +61 8226 2931 | **E:** [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au)  
[pir.sa.gov.au](http://pir.sa.gov.au)



*The Department of Primary Industries and Regions respects Aboriginal people as the state's first people and nations. We recognise Aboriginal people as traditional owners and occupants of South Australian land and waters. We pay our respects to Aboriginal cultures and to Elders past, present and emerging.*

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eA199293



Government  
of South Australia

The Hon Clare Scriven MLC

Clause 6(1)

Clause 6(1)

Dear Clause 6(1)

Thank you for your email dated 2 May 2023, on the importance of encouraging producers to act now and start implementing a programme to identify their sheep and goats with electronic identification (eID) tags.

The Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

Our 2023-24 budget package will assist the supply chain in the first stage of the eID transition through:

- a 50% per eID tag subsidy in 2023-24 and 2024-25 for newborn lambs and kids
- a 75% subsidy on essential infrastructure required for implementation of eID across the supply chain.
- A 50% retrospective subsidisation on all National Livestock Identification System (NLIS) accredited eID tags purchased from 01 January 2023.

South Australia's package is in addition to the Federal Government's contribution, which together will help sheep and goat producers transition to the new system with a national start date of 1 January 2025.

Once again, thank you for your letter about this important issue.

Yours sincerely

A handwritten signature in blue ink that reads 'Clare Scriven'.

Hon Clare Scriven MLC

**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT  
MINISTER FOR FOREST INDUSTRIES**

22 / 8 / 2023

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)





Minute to  
**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**

Ref: eA199293

For	<b>Noting and Signature</b>
Critical Date	Routine
Subject	Clause 6(1) [Redacted] <b>Mandatory EID Tagging</b>

**Synopsis**

Clause 6(1) [Redacted] Mt Bryan have sent an email to you requesting that you make an announcement on whether eID devices for sheep and farmed goats will be subsidised or not. They are concerned that if no direction is given the opportunity to tag the current drop of lambs will be lost.

**Recommendations**

That you:


1. Note the brief  
**NOTED**
2. Sign the attached letter to Clause 6(1) [Redacted]  
**SIGNED / NOT SIGNED**

.....*C. M. Scriven*.....

Hon Clare Scriven MLC  
**Minister for Primary Industries  
and Regional Development**  
**Minister for Forest Industries**  
8 / 6 / 2023

*Ministerial Comments - This response is now out of date & needs to be updated to reflect today's announcement.*

## Background

- The South Australian Sheep and Goat Traceability Steering Committee (SASGTSC) has developed a draft business case for implementation of mandatory sheep eID in the State.
- Clause 9(1)  

- The Commonwealth has committed \$20 million over 3 years beginning 2022-23 to be shared amongst all jurisdictions to support eID implementation.
- About \$3.2 million will be available to the South Australian government to support industry and must be matched by state funds.
- Even with the \$3.2 million co-investment, full implementation costs will be significantly greater.

## Discussion


- The SASGTSC is currently working through funding priorities in developing an implementation plan for sheep and goat eID in South Australia. The implementation plan is soon to be delivered.
- Other jurisdictions are considering how available funding will best support industry during implementation.

Clause 1(1)(e)



- Previous correspondence from Sheep Producers Australia, WoolProducers Australia and SAFEMEAT indicates strong support for the introduction of individual eID for sheep and goats, which will provide a viable opportunity for the sheep and goat industries to strengthen traceability for biosecurity, food safety and emergency response, and for supporting market access.
- South Australian sheep flock is estimated to be 10.6 million and the Western Australian flock is estimated to be 13.1 million.

## Tag incentives/subsidies:

- WA is the only jurisdiction that has committed funding for eID tag support.
- Clause 9(1)  

- WA announced that a further \$22.2 million will assist industry transition to the mandatory sheep and goat electronic identification system (eID) by 1 January 2025 to reinforce national traceability.
- The package provides additional funding for the Tag Incentive Payment (TIP) to assist sheep and goat producers to make the move to the new system, the amount of additional funding allocated to the TIP is unknown.
- NSW has announced it **will not** be providing government funding for tag support. They instead support pro-actively working towards a national scheme to reduce the

cost of eID tags for sheep and farmed goats on an on-going basis (such as a national tag tender)

- Victoria provided 100% cost difference support for the first year of eID implementation in 2017.

Clause 9(1)

- Discussions are being held with AgVic to explore collaborating with the Victorian tag tender as an option to reduce tag prices.
- Current retail prices are \$1.99 - \$2.09 per eID tag.
- When eID was introduced for cattle in South Australia, there was a tag subsidy for one year of 70 cents per tag for the first million tags. This was approximately 25% of the cost of a tag and the South Australian cattle herd was one million head at that time.
- Sheep Producers Australia has undertaken a project to look at industry eID tag transition support options for sheep and goats, a final report to the Sheep and Goat Traceability Taskforce (SGTTF) is anticipated in May 2023.

#### **Stakeholder / regional impacts, consultation and engagement**

Clause 9(1)

Clause 9(1)

- South Australian producers have increasingly been purchasing eID tags for sheep and goats in recent years.

#### **Management of key risks**

- It is acknowledged that collaboration between industry and government is vitally important. Department of Primary Industries and Regions SA will continue to work with SASGTSC, the SGTTF and SPA to determine options to reduce the costs of eID tags to producers.

#### **Legislative and/or financial implications**

- There is currently no funding to support subsidising eID tags for South Australian sheep and goat producers.
- Tags are an operating cost and would be a tax deduction.



**Attachments**

A. Letter to Clause 6(1)



for

**CHIEF EXECUTIVE**  
Department of Primary Industries and Regions

18/5/2023

<b>CONTACT</b>	Nathan Rhodes
<b>POSITION</b>	Executive Director
<b>DIVISION</b>	Biosecurity SA
<b>MOBILE and LANDLINE</b>	M 0437 328 592 P 08 8429 3135
<b>Cleared by</b>	Nathan Rhodes

**Gonos, Anthea (PIRSA)**

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**From:** Duan <duan.w@bigpond.com>  
**Sent:** Thursday, 18 May 2023 10:57 AM  
**To:** PIRSA:Minister Scriven  
**Cc:** Nicola Centofanti; Nick McBride; Tony Passin  
**Subject:** Sheep eID mandate

**Categories:** Corro - General

Dear Minister,

I am contacting you to extend to you some forewarning regarding the pending mandate of eID tags in sheep and goats.

I understand that you are meeting with the President and the CEO of Livestock SA early next week, hence would like to provide you with some recent developments.

You may recall that I met with you in Mt Gambier in early February to inform you of my concerns regarding the mandate, in particular regarding terminal animals that move from their place of birth directly to an abattoir. My direct involvement has been as a member of the Sheep and Goat Traceability Steering Committee, which concluded its tasks only a few days ago.

I have been appalled at the manner in which this committee was constructed and the utter disregard it has shown to the sheep producers of our State. So much so, that I have enacted my entitlement to submit a Minority Report, which will be permanently attached to the findings of this committee. I will ensure that you receive this report upon its completion. I have also included below a correspondence from myself to Livestock SA outlining my decision to undertake this process and its rationale.

I am encouraging and succeeding in having sheep producers (specifically prime lamb producers) write to Livestock SA to voice their opposition to the apparent position taken by Livestock SA, particularly pertaining to denying any exemptions for eID tags, and to announce that they will be considering reclaiming their voluntary transaction levies, which proved revenue our States Sheep Industry Fund (SIF), hence Livestock SA.

Be advised, there are rumors that NSW are reconsidering their position on exemptions for eID tags on vendor bred animals due to similar events unfolding in their State. In fact I have been told that in yesterdays Livestock SA's Board meeting, upon hearing this news, the President openly commented in frustration that if Livestock SA were aware of this earlier, they would have also supported such a proposition.

I am also aware that WA and QLD have sheep producer groups strongly advocating for the same outcome in their respective States.

I sense an opportunity for us to announce the same preparedness to consider and advocate for very simple and risk free, specific case exemptions, saving sheep producers tens of millions of dollars each year, and perhaps even become the leaders in this sensible approach.

Sincerely,  
Duan Williams.

**Gonos, Anthea (PIRSA)**

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**From:** PIRSA:Minister Scriven  
**Sent:** Friday, 16 June 2023 10:24 AM  
**To:** duan.w@bigpond.com  
**Subject:** eA199385 - Minister Scriven correspondence  
**Attachments:** eA199385 - Minister Scriven correspondence - signed 15.6.2023.pdf

**Importance:** High

**OFFICIAL**

Good morning Mr Williams

Please find attached correspondence from Minister Scriven regarding your concerns about eID tagging exemptions.

Kind regards

**Office of the Hon Clare Scriven MLC**

**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**

Government of South Australia | 1 King William Street, Adelaide  
GPO Box 1671 Adelaide SA 5001

**T:** +61 8226 2931 | **E:** [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au)

[pir.sa.gov.au](http://pir.sa.gov.au)



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eA199385



Government  
of South Australia

The Hon Clare Scriven MLC

Mr Duan Williams  
SA Sheep and Goat Traceability Steering Committee

Clause 6(1)

[duan.w@bigpond.com](mailto:duan.w@bigpond.com)

Dear Mr Williams *Duan,*

Thank you for your email of 17 May 2023 regarding your view that tag exemptions should be made for sheep consigned from property of birth direct to slaughter and notifying me of your decision to submit a Minority Report to Livestock SA on the matter which has now been received by my office.

All jurisdictions have supported the implementation of eID in sheep and goats to improve traceability. Improved traceability provides transparency in the supply chain and enhances our biosecurity. Our trading partners and consumers are increasingly demanding greater assurances in food safety and product traceability.

While the current mob-based, visual tag system has been adequate until now, it has been found to be lacking in critical areas of accuracy, speed and efficiency of tracing. These factors are critical in our ability to rapidly identify, trace and control an exotic animal disease outbreak. eID technology would also provide an essential pathway to regain lost market access following an outbreak.

While the risk of traceability loss for sheep consigned from property of birth direct to slaughter is lower than less direct movements, it is not non-existent. The traceability of these animals is further safeguarded with the implementation of eID devices.

As Minister for Primary Industries and Regional Development, I support national consistency, and as such do not support individual state level exemptions of this nature. Further, I am advised that eID tagging exemptions for sheep consigned directly from property of birth to abattoir for slaughter is not supported by the SA Sheep and Goat Traceability Steering Committee.

Likewise, my understanding is that the national sheep and goat producer bodies are in favour of individual identification and full traceability, as is the Australian Meat Industry Council.

I appreciate the work undertaken by the South Australian Sheep and Goat Traceability Steering Committee to support the implementation of a nationally harmonised system within South Australia.

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)



Once again, thank you for writing to me with your concerns about livestock identification and traceability.

Yours sincerely

A handwritten signature in blue ink that reads "Clare Scriven". The signature is fluid and cursive, with a long horizontal stroke at the end.

Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

16/6/2023



Minute to  
**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**

Ref: eA199385

For	<b>Noting and Signature</b>
Critical Date	Routine
Subject	<b>eID tagging exemption for sheep moving from property of birth direct to slaughter</b>

**Synopsis**

You met with Mr Duan Williams in Mount Gambier on 13 January 2023. Mr Williams has again written expressing concern of Livestock SA Sheep and Goat Traceability Steering Committee's position on a tag exemption for sheep consigned from property of birth direct to slaughter. Mr Williams also notes his intent to submit a Minority Report to Livestock SA outlining his position on such exemption.

**Recommendations**

That you:

1. Note the brief  
**NOTED**
2. Sign the attached letter  
**SIGNED** **NOT SIGNED** 15/6 Edits needed.

*C. M. Scriven*

Hon Clare Scriven MLC

**Minister for Primary Industries  
and Regional Development**  
**Minister for Forest Industries**

15/6/2023

**Ministerial Comments -**

## Background

- In September 2022, Agriculture Ministers reaffirmed their commitment for government to work collaboratively with industry to advance work on a national approach to introduce a national mandatory individual electronic identification (eID) system for sheep and goats by 1 January 2025.
- Agriculture Ministers in December 2022 reiterated their intention to implement harmonised tagging requirements for all managed farmed sheep and goats using individual electronic identification, working towards 1 January 2025 implementation.
- PIRSA's Red Meat and Wool Growth Program provided Livestock SA with \$140,000 to undertake a project to explore the costs and benefits of sheep and goat eID in South Australia, and to develop a state-based implementation and communication strategy. The project is governed by the Livestock SA Sheep Traceability Steering Committee (the Steering Committee).
- The Steering Committee includes two representatives from the Department of Primary Industries and Regions (PIRSA), along with representatives from all sheep and goat industry sectors.
- This work commenced in September 2022 with the engagement of ACIL Allen to develop a Business Case for sheep and goat eID in South Australia (SA).
- Phase 2 of the project, which will conclude in June, will outline the steps industry will need to take to implement a sheep and goat eID program in SA. A communication and engagement strategy will accompany the implementation plan.
- Both the Business Case and Implementation Plan will be used to help inform government decision making on mandatory sheep and goat eID implementation in SA.
- The Steering Committee discussed a proposed eID tagging exemption for sheep sent from property of birth direct to slaughter, at several meetings. This proposal was rejected by the Steering Committee, who agreed not to consider further sheep and goat tagging exemptions beyond those that already exist in the system. This position is consistent with other jurisdictions and national peak bodies to ensure national harmonisation.
- Duan Williams is a member of the Steering Committee. He and his family have a property near Mount Burr and farm cattle and sheep for wool and prime lamb production.
- Mr Williams has voiced disapproval in the past to the makeup of the Steering Committee, claiming to be the only commercial sheep/lamb producer.
- Mr Williams has written to Livestock SA to advise that he has reached out to some sheep producers in SA and has encouraged them to reclaim their voluntary transaction levies (which contribute to the Sheep Industry Fund (SIF)), in response to Livestock SA's apparent position on tag exemptions.
- Provisions of the *Primary Industry Funding Schemes (Sheep Industry Fund) Regulations 2014* allow sheep producers to request a refund from the Fund for contributions made. However, persons receiving a refund will not be entitled to receive a direct benefit from the Fund for a period of 2 financial years following the financial year in respect of which general contributions were refunded.

- Mr Williams has informed the Minister and Livestock SA that he will be submitting a Minority Report to Livestock SA, in conjunction with the Steering Committee's Implementation Plan and Communication and Engagement Strategy Report.

### Discussion

- The primary purpose of livestock traceability is to track animals throughout their entire life to allow effective and efficient identification of animals potentially affected with a residue or infected with an emergency animal disease. Australia's traceability system underpins our livestock product integrity and assists to manage risks to biosecurity, disease control, food safety and market access.
- Mr Williams has made numerous claims that SA sheep producers are supportive of a tag exemption for sheep consigned from property of birth direct to slaughter. However, this claim has not been adequately quantified.
- Furthermore, Mr Williams has informed Livestock SA that as a member of the Steering Committee, he has reached out to sheep producers in the north of the state on the matter, to whom have not been forthcoming with support of such a tag exemption.
- Mr Williams has voiced concerns in the past about the makeup of the Steering Committee, particularly the lack of representation from the commercial prime lamb sector.
- However, apart from Mr Williams, of the 13 members, 4 others also represented sheep and wool producers. There were 2 other members representing sheep/lamb producers, as well as a member each representing Sheep Producers Australia and Wool Producers Australia.

### National and Industry Considerations

- All producer peak bodies, industry bodies, state and territory jurisdictions and the federal government are committed to a nationally harmonised traceability system that involves individual electronic identification of all farmed sheep and goats.
- The Australian Meat Industry Council (AMIC) has announced that their processor members won't accept visually identified sheep after 1 January 2027.

#### Clause 9(1)

- Agriculture Victoria has also indicated that it intends that all South Australian produced lambs must meet Victorian requirements after implementation, which currently requires all lambs to have an eID tag.
- The NLIS Traceability Evaluation Report found that sheep identified with electronic identification devices (EID) were traceable to 99.6% and sheep identified with visual tags were traceable to 70.1%.

### Traceability Risks

- Issues associated with the tagging exemption of vendor bred sheep and goats direct to slaughter include:
  - Increased risks to food safety - eID provides accurate food safety assurances, statuses can be applied to individual devices, this cannot be done with visual tags.



- Claims of proof of freedom for export markets will not be as robust and may impact our ability to trade. Determining the life history of all stock is much slower using visual tags and compliance will be lower.
- Traceability of the system will be slower and less accurate if the industry must manage and maintain a dual/hybrid NLIS indefinitely (i.e. mob-based movement data AND eID data will need to be uploaded to the database. Both systems will then require interrogation and analysis in emergency tracing situations).
- Visually identified animals at the abattoir have greater traceability risks associated, including uploading errors - eID allows errors to be identified and rectified in a timely manner thus retaining accurate traceability.
- Vendor bred animals do not always come from the property of birth - sellers may have multiple properties and as such the last property the sheep or goats have been on may not be the property of birth. This increases traceability and compliance risks.
- Property of birth consignments can include a mix of age, types and breed. These consignments require further drafting at the abattoir and increases the likelihood of loss of traceability.
- Property of birth direct to slaughter exemption could encourage producers to delay tagging in order to capitalize on the exemption later in the animal's life (particularly risky with breeding stock retained on property for many years).

#### **Other benefits of individual identification of livestock**

- Whilst not the main reason for requiring mandatory eID in sheep and goats, electronic individual identification of production animals can have the following benefits:
  - Identifying, measuring and understanding variation provides production opportunities. Electronic tagging allows variation to be identified through measuring the performance of individual animals.
  - Production and business decisions can then be made on actual data. It also enables the producer to apply decisions specific to that individual, reducing costs and labour, while at the same time maximising returns.

#### **Harmonisation of the Sheep and Goat eID system throughout all states and territories**

- Agriculture Ministers have clearly indicated their expectation for a harmonised sheep and goat eID system. Harmonisation of rules and requirements, and the legal framework that underpins the system is drawn from the Sheep and Goat NLIS Standards.
- The NLIS standards outline the obligations that all industry sectors must abide. State and Territory legislation and regulations are reflective of these standards.
- The eID Sheep and Goat Standards are currently being reviewed and updated through Jurisdictional Traceability Group, and SAFEMEAT Partners.
- The only tagging exemption currently permitted in the Standards is that for Rangeland Goats, on WH&S and animal welfare grounds.
- For all the reasons outlined above, all National Industry Peak Bodies, the Commonwealth Government and State Jurisdictions are unsupportive of additional

exemptions beyond those already permitted in the NLIS Standards (i.e. for rangeland goats).

**Stakeholder / regional impacts, consultation and engagement**

• **Clause 2(1)**



**Management of key risks**

- State level exemptions would impact on the ability to implement a nationally harmonised sheep and goat traceability system.
- Exemption proposals such as this should be driven through national industry bodies (both producer and processor) to ensure the continuance of a nationally harmonised system. Both producer and processor peak bodies have indicated they are not supportive of such exemptions.
- As with cattle, it is intended that PIRSA can provide individual exemptions from such tagging requirements in extenuating circumstances, such as animals needing to be moved after a bushfire where tagging facilities have been destroyed.

**Legislative and/or financial implications**

- None

**Attachments**

- A. Letter of response to sheep producer Mr Duan Williams

A handwritten signature in black ink, appearing to read 'Duan Williams'.

**CHIEF EXECUTIVE**

Department of Primary Industries and Regions

31/5/2023

<b>CONTACT</b>	Nathan Rhodes
<b>POSITION</b>	Executive Director
<b>DIVISION</b>	Biosecurity
<b>MOBILE and LANDLINE</b>	M 0437 328 592 P 08 8429 3135
<b>Cleared by</b>	Petra Lennon

**Gonos, Anthea (PIRSA)**

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**From:** Duan <duan.w@bigpond.com>  
**Sent:** Monday, 10 July 2023 6:19 PM  
**To:** PIRSA:Minister Scriven  
**Cc:** Nicola Centofanti; Nick McBride; Tony Passin  
**Subject:** Re: eA199385 - Minister Scriven correspondence  
**Attachments:** Reply to Minister Scriven.pdf; Minister Scriven correspondence - signed 15.6.2023.pdf

**Categories:** Corro - General

Dear Minister Scriven,

Please find attached my response to your previous correspondence regarding the eID mandate.

Sincerely,  
Duan Williams.

Dear Minister Scriven,

I thank you for your reply on the 16th of June 2023 regarding my view that tag exemptions should be made for sheep consigned from property of birth direct to slaughter, a copy of your reply is attached below.

I have some questions for you regarding a number of statements you have made in this correspondence, in an interview on the ABC's radio program 'The County Hour', and in the Stock Journals' June 8th issue.

### **Statement 1:**

*"All jurisdictions have supported the implementation of eID in sheep and goats to improve traceability"*

Shouldn't the implementation of an extremely expensive reform, be expected to resolve the issues that triggered the reform?

A report produced by 'Safemeat', "Reform recommendations for Australia's livestock traceability system" clearly reveals that even after 20 years of individual animal identification used in our cattle industry, the traceability outcomes, when tested, still fall well short of the required National Traceability Standards. It also reveals that the sheep industries current visual mob based system is only 11% behind the Cattle in traceability accuracy, this narrow margin is despite the mob based systems shortcomings which have been attributed to NVD non-compliance issues. The cause of these shortcomings have been undeniably identified by multiple trials and well documented.

### **Question 1:**

How do you justify supporting a mandate of a reformed system in the sheep industry (which as stated by Livestock SA will cost the industry in excess of \$800 million dollars), that is proven to be ineffective? Infact when compared to the same system in the cattle industry, at best, can only gain 11% in accuracy, still leaving it well short of the traceability requirements set by the current standards?

### **Statement 2:**

*"Our trading partners and consumers are increasingly demanding greater assurances in food safety and product traceability."*

*"The traceability of these animals (vendor bred traded directly to slaughter) is further safeguarded with the implementation of eID devices."*

It is the NVD, which is signed by the vendor (a legally binding, statutory declaration) which accompanies all traded consignments of sheep and lambs, in conjunction with the NLIS database, which provides all necessary assurances, encompassing traceability, food safety standards, animal husbandry and welfare issues. In the very common case of sheep being traded from their place of birth, directly to an abattoir, the addition of an individually identifiable ear tag does absolutely nothing to enhance any of the required criteria.

As I understand it, our trading partners are requesting 'lifetime traceability' nothing more, nothing less. Sheep and Lambs being traded directly to abattoirs from their place of birth indisputably meet this criteria, via the use of the signed NVD, as they always have. It makes absolutely no difference if the other States have differing requirements, all that matters is that the animals are 100% traceable, which they indisputably are.

In this scenario of vendor bred sheep being traded directly to slaughter, ALL possible information about the animals is known and transparent. There is nothing further to give. The addition of an eID tag provides **absolutely nothing** that isn't already supplied with the NVD.

## Question 2:

Since you willingly endorse mandating the additional cost of tens of millions of dollars for sheep producers, each year, for the rest of time - what additional information do you believe is provided by an eID device, in exclusive loads of animals, traded from their place of birth directly to slaughter?

## Statement 3:

*"While the current mob-based, visual tag system has been adequate until now, it has been found to be lacking in critical areas of accuracy, speed and efficiency of tracing."  
"These factors are critical in our ability to rapidly identify, trace and control an exotic animal disease outbreak."*

Multiple trials and simulations, over many years, of a disease incursion have come to the same conclusions, *"The NLIS systems for cattle based on individual electronic devices, and for sheep and goats based on mobs, are both capable of tracing for FMD and meeting national tracing standards using the NLIS database as the primary tracing tool."*

One of these trials, Exercise Tuckerbox, under the heading *"Using the NLIS database"* the discussion notes, on page 5, that summary reports for cattle movements were used in preference to detailed reports containing RFID data. This is further noted at pages 13 & 14 where it is stated *"detailed database reports which listed all RFID's would have slowed down tracing due to the greater volume of data to collate, summarise and assess."* Noting that 581 lines of data (representing mobs) were copied and pasted in several seconds, where as this represented 3138 animals, **which would have taken much longer.**

These trials and simulations, such as Sheepcatcher II, also conclusively highlight that non-compliance with the requirements of correctly filling in and storing NVD's is the weakness in the mob based system.

How serious about traceability are we really?

As a SA sheep producer, if I don't pay \$66 to renew my PIC number every 2 years, the penalty is to disallow me from trading.

If I don't complete the LPA Accreditation every 3 years, the penalty is to disallow me from trading.

If I don't accurately fill in an NVD (a legally binding document, the cornerstone to traceability and food safety) when trading sheep and keep the NLIS database updated with my mob movements, the penalty is a warning letter. If I am a repeat offender, the penalty is another warning letter, and so on. Whilst there is the mechanism to be issued with a fine for non-compliance, our

committees representative who works within the NLIS system, told me that this is scarcely, if ever, enacted.

So how serious are we about traceability? And if it is the problem we are being led to believe, why haven't the failures to comply with the current system been addressed?

Also, courtesy of the Pastoralists' Association of West Darling:

"Sheep and goat producers have been incessantly bombarded with reasoning that eID is necessary because only 70.08% of visually identified sheep presented for slaughter could be traced back to the vendor or property of residence in the previous thirty days within 24 hours. Inexplicably, the NSW Department for Primary Industries has released an eID Implementation Plan that makes no mention of changing the current provision that allows processors up to two working days to upload NVD information to the NLIS database, which is a negligent oversight. Looking at the NLIS database is preferential to running around scanning tags in the event of a disease outbreak, but livestock cannot be traced on the database within 24 hours when two working days is allowed to upload NVD's."

"PAWD understands that the proposed NLIS database upgrade will incorporate our recommendation to link NVD's and the NLIS database, thus facilitating immediate and automatic data upload. This single action will improve traceability significantly. Pausing adoption of eID at this point in order to evaluate traceability improvements is strongly recommended. This single action may in isolation deliver all the traceability improvements that we need."

### **Question 3:**

Why aren't these non-compliance and NLIS lag time issues being addressed **before** endorsing, reportedly \$800 million on a sheep and goat eID system, which the Cattle industry has conclusively proven is not the answer to traceability?

### **Statement 4:**

*"eID technology would also provide an essential pathway to regain lost market access following an outbreak"*

NZ have recently reviewed their sheep industries tracing capabilities and concluded that individual animal identification is unnecessary, the mob based system is entirely adequate - they sell 9 times more sheep meat into the European markets than we do.

Ireland, the UK and the USA all have exemptions for eID tag free movement's for animals destined directly to slaughter under 12 months of age - even after the UK suffered a FMD incursion in 2001 and enacted a mandate on eID tagging all other sheep in 2010.

### **Question 4:**

In the event of a disease incursion, naturally the lowest risk movements of animals will be the first reinstated - animals from their place of birth, moving directly to slaughter.

What evidence can you provide that eID technology, at a cost of \$800 million, is 'essential' to regaining market access in the event of an incursion, and how would a very specific exemption, on the lowest risk animal movements, hinder this process?

## Statement 5:

*"While the risk of traceability loss for sheep consigned from property of birth direct to slaughter is lower than less direct movements, it is not non-existent."*

Nothing is without risk, everything we do is about risk management.

For example, we could absolutely, easily terminate all road fatalities in our country..... by outlawing all motor vehicles.

I would speculate that every person in our society would be in favor of abolishing all road fatalities? It is entirely achievable - but obviously, it is not worth the cost. We are willing to live with the risk of some people dying in order to maintain our economy, standard of living, and freedoms. Evidently our society is accepting of that level of risk. **The benefits of using motor vehicles outweighs the risk of some fatalities.**

Most decisions regarding the the rules that govern our society have similar trade-offs. The most appropriate means of assisting in drawing a line of acceptance between a risk (cost) and any associated benefit is to undertake a cost/benefit analysis. As a member of the SA Sheep and Goat Traceability Steering Committee, I requested, many times, that cost/benefit analysis be undertaken to determine whether the benefits associated with mandating eID tags for ALL sheep and goats warranted the costs. Despite already employing a consulting firm to assist in producing the 'business case', via data analysis - my request was ignored, many times, **this analysis was not done**, and a conclusion was reached without any supporting metrics, rather through opinions and emotions. Not even vaguely an appropriate method of making a decision with ramifications worth tens of millions of dollars, annually, forever.

## Question 5:

Knowing that the Steering Committee did not even remotely investigate the costs versus benefits of allowing an exemption for vendor bred animals being traded directly to slaughter, whilst having committed to allowing an exemption for harvested free range goats - on what do you base your decision to disallow an exemption from eID tags for directly terminal sheep and lambs?

## Question 6:

In the case of sheep being traded from their place of birth directly to an abattoir, and understanding that the signed NVD guarantees that all animals in the consignment were born on the property of origin ('yes' to question 3 on the NVD), please explain precisely where the traceability of these animals can be compromised?

## Statement 6:

*"As Minister for Primary Industries and Regional Development, I support national consistency"  
"I appreciate the work undertaken by the South Australian Sheep and Goat Traceability Steering Committee to support the implementation of a nationally harmonised system within South Australia."*

*"national sheep and goat producer bodies are in favour of individual identification and full traceability"*

As I have questioned many times, why does the desire to succumb to the rhetoric of the other States, merely because some of them are more advanced in this procedure than us, supersede the requirement to objectively investigate the most suitable outcome for the industry as a whole? To merely resign to accepting that which others are executing will not perpetuate an outcome that is optimal for our jurisdiction.

Both the States of NSW and QLD are experiencing increasing pressure from producers to reconsider allowing exemptions. I've heard that NSW are seriously reconsidering including exemptions for sheep direct to slaughter. I have also been told, by one of the designers in the development of the Victorian eID implementation, that they "obviously made a mistake" by not including specific exemptions, namely for vendor bred sheep treated directly to slaughter.

### **Question 7:**

How is blindly supporting 'harmonisation' with the other States, knowing that many of them are further advanced in this process, allowing SA to objectively develop the most suitable scenario for our industry?

### **Statement 7:**

*"I am advised that eID tagging exemptions for sheep consigned directly from property of birth to abattoir for slaughter is not supported by the SA Sheep and Goat Traceability Steering Committee."*

You have also been advised, by myself as a member of this Steering Committee, of the extreme bias in the composition of the SA Steering Committee, whose outcomes were evidently preordained, and most certainly not 'industry led' as advertised.

From the steering committees' terms of reference: "The members of the Steering Committee shall be";

- 1 nominee from the Livestock SA Board
- representatives including but not limited to livestock agent, saleyard, meat processing, goat industry, transporters and integrity systems specialists.

Of the 12 members, the Steering Committee actually comprised of 3 Livestock SA board members, 2 additional members are also members of SAFEMEAT, an organization with a preordained agenda to mandate eID tags (who will not suffer any financial burden due to a mandate).

There are 2 members representing Saleyards, 3 members don't even live in South Australia and other than indicating 'not limited to' - **there is no mention of sheep producers** - who are by far the largest of the stakeholders and the only stakeholder to incur the ongoing costs associated with this mandate.



## Question 8:

This committee is starkly **not** a true representation of the livestock industry in South Australia. Knowing full well that this committees' decision to deny any exemptions for sheep (but allowing exemptions for certain goats) was made, purposely, despite many requests for critical data analysis being ignored, how can you endorse the recommendations of this committee whilst claiming that they have been 'industry led'?

## Statement 8:

*"the fact that now producers will know that they can get 75% of the essential infrastructure, they know that the tags will be less than \$1 in terms of the cost to them, and they know what the pathway is going forward. I think it will help to overcome some of that"* (opposition to a mandate from some producers)

Producers are not getting 75% of essential infrastructure, the sale yards and meat processors are getting 75% of their infrastructure subsidised, **some** producers will get a 50% rebate for their tag costs, but only for the next 2 years - hence this hardly includes a rebate for terminal lambs since they are not required to have eID tags until post Jan 1st 2025, by this stage I seriously doubt any funds for rebates will remain available.

Livestock SA's business case, presented to you, the Minister, insists that only 5% of producers will require any tag reading equipment. How can a sheep producer utilise an eID tag, which has been touted as a major benefit for management purposes, if that producer does not have the equipment to read a tag?

The sheep farmer gets by far the smallest share of the funds, and only for 2 years, when not only will they incur the greatest costs, ongoing, forever, but all other sectors of the supply chain can, and will, readily pass their costs onto the producer via increased saleyard fees, increased merchandise costs and reductions in the purchase price of stock. Let me make one thing perfectly clear, the sheep producer will inevitably incur **all** of the costs of this mandate - there is no means of sharing the costs equitably amongst the industry, this is the essence of economics.

How long will it be before ALL sheep producers will be required to 'reconcile' the NLIS database, as is required by 'EU accredited' Cattle producers? The cost of this additional time and effort will dwarf the \$2 cost of the eID tag. If this requirement does not ensue, the NLIS database will very quickly become overrun with false data (as it is in Cattle, and anecdotally immensely out of control in Victorias' sheep eID database), rendering it useless if required to trace a disease incursion.

I was recently charged a \$2/head "NLIS scanning fee" when purchasing cattle through a local Sale Yard. It is obvious that the additional costs in administering an eID database and equipment will again be passed onto producers. A mandate on eID tags in sheep can very quickly rise from the \$2 eID tag to \$5-\$10/head once reconciling the database is required and administrative costs are handed down. (again, I requested, many times, investigation and analysis be done on these additional costs, my requests were ignored and **none were done**).

## Question 9:

Producers have been assigned nothing more than a 50% rebate, for some ear tags, for the next 2 years. Please explain how this equates to producers getting 75% of essential infrastructure, as you have stated?

### **Question 10:**

Can you categorically assure producers that reconciliation of eID devices against the NLIS system will not be required in the future, further adding significant costs and effort to their businesses?

Courtesy of the Pastoralists' Association of West Darling:

“UHF tags can be read at a rate approximately ten times faster at a range approximately ten times further than LF tags can be read. UHF tags are 25% to 75% cheaper than LF tags and UHF tag readers are a half to a third the cost of LF tag readers. Furthermore, UHF tags cannot be re-written or cloned but can store data - all features that are not available with LF tags. Clearly, UHF tags are the best technology available. If Australia must adopt eID for sheep and goats then we should use UHF tags.”

### **Questions 11:**

Why are we contemplating mandating the use of inferior and more costly Low Frequency eID tags when far superior UHF tags and readers are available ?

### **Further Questions regarding the tag rebate for producers:**

- Who do I apply to for the tag rebate?
- Who is eligible for tag rebate?
- Is it first in first served? Remembering that there is about \$4.5M available for 2 years, to be shared amongst over 5000 SA sheep producers, representing about 10 million sheep, with natural increases of about 5 million per year.
- Are there any limitations to the rebate?
- Can I invest \$100k in tags now, to cover me for a few years, and expect to reclaim \$50k back in rebates?
- What happens if 500 SA sheep producers decide to do this?

It disturbs me greatly that as the current Minister, representing Agriculture in SA, you have so readily accepted the mantra touted from other jurisdictions and from Livestock SA, who have proven themselves to be subservient to bureaucracy, and all too willing to neglect the interests of the livestock producer, whom they purportedly represent.

When I volunteered my time and intimate knowledge of commercial sheep meat production, I honestly believed that the proposition of a system entailing monumental, reoccurring economic consequences for the livestock producer would be investigated with the upmost regard, caution and be required to be overwhelmingly beneficial to the industry to warrant such an impost. I have been seriously disheartened with what I have witnessed throughout this process, most notably by the lack of morality shown by those who will not suffer any consequences of their ill-founded decisions.

Are you aware that current sheep meat prices have fallen by nearly 40% when compared to this time last year, even the past 5 years. The coarse wool produced from prime lamb breeding stock has fallen by over 40% in the past few years, in fact to a point that the wool harvested does not cover half of the cost of shearing these sheep. All while the price for sheep meat products in the supermarkets have remained unchanged. Our input cost such as pasture seeds, fertiliser and all animal husbandry medicines continue to rise. The Australian sheep farmer has been, and still is the backbone of our nation. Sheep farmers are an integral part of an \$80 billion dollar national industry, and one of very few industries left in our nation that actually creates wealth, through significant individual investment and hard, honest work.

It begs the questions, why are commercial sheep producers being treated with such contempt? How do you justify compelling sheep producers to incur this additional, ongoing cost to their production, when the very organization you cite as you're source of reason, deliberately refused to evaluate the rationale behind its decision to impose annual costs of tens of millions of dollars onto sheep meat production, particularly when specifically designed to be traded directly to slaughter?

I look forward to your explanation of these enquiries.

Sincerely,  
Duan Williams.

**Gonos, Anthea (PIRSA)**

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**From:** PIRSA:Minister Scriven  
**Sent:** Friday, 18 August 2023 4:25 PM  
**To:** duan.w@bigpond.com  
**Subject:** eA199395(2) - Minister Scriven Correspondence  
**Attachments:** eA199395(2) - WILLIAMS, Duan - 18 August 2023.pdf

MPIRD: eA199395(2)

Dear Mr Williams

Please find attached correspondence from Minister Scriven dated 18 August 2023.

Kind regards

**Office of the Hon Clare Scriven MLC**  
**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**  
Government of South Australia | 1 King William Street, Adelaide  
GPO Box 1671 Adelaide SA 5001  
**T:** +61 8226 2931 | **E:** [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au)  
[pir.sa.gov.au](http://pir.sa.gov.au)



*The Department of Primary Industries and Regions respects Aboriginal people as the state's first people and nations. We recognise Aboriginal people as traditional owners and occupants of South Australian land and waters. We pay our respects to Aboriginal cultures and to Elders past, present and emerging.*

Disclaimer: The information in this email may be confidential and/or legally privileged. Use or disclosure of the information by anyone other than the intended recipient is prohibited and may be unlawful.

eA199385(2)



Government  
of South Australia

The Hon Clare Scriven MLC

Mr Duan Williams

Clause 6(1)

[duan.w@bigpond.com](mailto:duan.w@bigpond.com)

Dear Mr Williams *Duan,*

Thank you for your reply email of 10 July 2023 regarding your view that eID tag exemptions be made for sheep consigned from property of birth direct to slaughter.

As outlined in previous correspondence, I do not support tag exemptions beyond those that already exist in the system for critical reasons of biosecurity and traceability, market access and food safety.

Electronic identification has been proven more effective than the mob-based system in key areas of accuracy, speed and efficiency of tracing. These factors are critical in our ability to rapidly identify, trace and control an exotic animal disease outbreak. eID technology will also provide an essential tool in demonstrating proof of freedom - essential to regain lost market access.

Like my interstate ministerial counterparts, I support a nationally consistent traceability system that provides greater transparency in the supply chain and enhances our biosecurity. Our trading partners and consumers are increasingly demanding greater assurances in food safety and product traceability.

I would be pleased to provide you with details of the state government's support package for eID devices and essential eID infrastructure once the details have been finalised. The government will be providing further details to the industry on the eligibility and application process in the coming weeks.

Once again, thank you for writing to me to express your views on sheep and goat electronic identification in South Australia. I appreciate the strong commitment you have to the interests of the producer sector.

Yours sincerely

Handwritten signature of Clare Scriven in black ink.

Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

*18 / 8 / 2023*

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)



OFFICIAL: Sensitive



Government of South Australia  
Department of Primary Industries  
and Regions

Minute to  
**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**

Ref: eA199395(2)

For **Noting and Signature**  
Critical Date **Routine**  
Subject **Sheep and Goat eID – tagging exemptions**



### Synopsis

Mr Williams has written to you in reply to a letter you sent him last month (eA199385) responding to his Minority Report and the ongoing concerns he has with the pending implementation of sheep and goat eID in South Australia, specifically tag exemptions for sheep sold from property of birth direct to slaughter.

He has written numerous times on this same matter and posed many of the same questions to which you have responded accordingly.

In this recent letter Mr Williams lists a series of questions and statements regarding the government's position on vendor bred/direct to slaughter exemptions, to which he requests your explanation. He is also seeking further details to the governments support package recently announced.

Most of the questions he asks in this letter have been adequately addressed in previous correspondence or the work of the Sheep and Goat Traceability Steering Committee, thus requiring no further comment. In addition, the justifications he provides to refute the government's position on tag exemptions are largely ill-informed, outdated or in contrary to state and national positions. They require no further investigation by government.

### Recommendations

That you:

1. Note the brief.  
**NOTED**
2. Sign the attached letter.  
**SIGNED / NOT SIGNED**

Hon Clare Scriven MLC

**Minister for Primary Industries  
and Regional Development**

**Minister for Forest Industries**

18/8 / 2023

**Ministerial Comments -**

OFFICIAL: Sensitive

## Background

- Duan Williams was a member of the industry led Livestock SA Sheep and Goat Traceability Steering Committee (the Steering Committee). He and his family have a property near Mount Burr and farm cattle and sheep for wool and prime lamb production.
- Throughout the Steering Committee's work, Mr Williams voiced several opposing views to those that were agreed by the Committee, including that of tag exemptions for sheep moving from property of birth/vendor bred direct to slaughter. These are detailed in his Minority Report that has been provided to you previously.
- Mr Williams has written to you previously regarding this same issue, whereby you have addressed his concerns and offered thorough justifications for the government's position on tag exemptions (eA198719, eA199385).
- Last month you announced the governments support package to assist in the implementation of sheep and goat eID. This involves grants for essential supply chain infrastructure and eID tags.
- This package will support the entire sheep and goat supply chain, including sheep and goat producers.

## Discussion

- Mr Williams continues to voice his support for a vendor bred/property of birth direct to slaughter tag exemption, arguing that electronic identification of sheep and goats provides no traceability benefits beyond that of the current mob-based system.
- However, the 2020 NLIS Traceability Evaluation Report found that sheep identified with electronic identification devices (EID) were traceable to 99.6% and sheep identified with visual tags were traceable to 70.1%. Several thousand sheep from across the country were evaluated as part of this report.
- This evaluation report supersedes many others carried out in previous years, such as the 2012 'Exercise Tuckerbox' to which Mr Williams regularly refers to.
- Furthermore, this exemption proposal was rejected by the Sheep and Goat Traceability Steering Committee on the basis that key traceability, market access and food safety expectations cannot be met with the current visual tag system, and their strong support for the system to remain nationally harmonised.
- This position is consistent with all other state jurisdictions, the Commonwealth, and national peak bodies to ensure national harmonisation and optimal traceability throughout the entire supply chain.
- Mr Williams accurately points out that managing and monitoring non-compliance in the system is a continuing challenge for jurisdictions. This is particularly the case with the mob-based system due to inaccuracies in mob-based data, difficulties in determining non-compliance and the unavoidable lag time between livestock movement and desktop compliance activities.
- The eID system however will provide the opportunity to monitor compliance in a far timelier manner, with enhanced reporting capabilities available through the NLIS database. It is widely expected that this will lead to improved compliance outcomes, as is the case with the cattle eID system.

- Mr Williams also makes comment about UHF technology as being superior to than that of the RFID system. This topic is often raised by producers, however it is recognised that this technology is unsuitable for certain supply chain environments, such as in the processing and saleyard sectors, due to interference and performance issues.
- Mr Williams has also asked for assurance that PIC Reconciliations will not become a mandated part of the system for producers in the future. PIC reconciliations are not currently mandated by government in either the cattle or sheep and goat eID systems. Nor is the process required by producers in the NLIS Sheep and Goat eID Standards or the NLIS Cattle Standards.
- You have clearly outlined the merits of the eID system in your previous responses to Mr Williams. Despite this it is apparent that Mr Williams disagrees with the government's position on this matter.
- These benefits are well recognised and accepted by government and key supply chain representative bodies, and thus require no further explanation from yourself.
- Furthermore, much of the evidence that Mr Williams refers to in his correspondence is in part outdated and has been superseded with more detailed evaluations of the system and improved tracing capabilities of the electronic system. This includes enhancements to the NLIS Database and the tracing reports available within.
- In addition, the support package that you have announced will provide producers, such as Mr Williams, assistance to implement eID on-farm, including supporting essential eID infrastructure and eID tags where appropriate.
- The Department of Primary Industries and Regions (PIRSA) is currently working to develop guidelines and an application process for producers and supply chain participants to access this funding. Details will be made available in the coming weeks.

#### **Stakeholder / regional impacts, consultation and engagement**

- PIRSA has established a Sheep and Goat eID Implementation Team to progress eID in South Australia. The Project Manager has been consulted on this briefing.
- Nationally the livestock processing sector has indicated they will not accept sheep without an eID tag after 1 Jan 2027. If an exemption is provided for SA producers, TFI, JBS and interstate abattoirs are likely not to accept non-eID tagged sheep in future, restricting the markets available to producers.

#### **Management of key risks**

- State level exemptions would impact on the ability to implement a nationally harmonised sheep and goat traceability system.
- Exemption proposals such as this should be driven through national industry bodies (both producer and processor) to ensure the continuance of a nationally harmonised system. Both national producer and processor peak bodies have indicated they are not supportive of such exemptions.
- As with cattle, it is intended that PIRSA can continue to provide individual exemptions from such tagging requirements in extenuating circumstances, such as animals needing to be moved after a bushfire where tagging facilities have been destroyed.



**Legislative and/or financial implications**

- None

**Attachments**

- A. Letter of response to Mr Duan Williams



for

**CHIEF EXECUTIVE**  
Department of Primary Industries and Regions

25/7/2023

<b>COTACT</b>	Nathan Rhodes
<b>POSITION</b>	Executive Director
<b>DIVISION</b>	Biosecurity SA
<b>MOBILE and LANDLINE</b>	M 0437 328 592 P 08 8429 3135
<b>Cleared by</b>	Laura Bruce

## Gonos, Anthea (PIRSA)

---

**From:** Petney, Karen <Karen.Petney@parliament.sa.gov.au>  
**Sent:** Thursday, 25 May 2023 1:34 PM  
**To:** PIRSA:Minister Scriven  
**Subject:** Office of Penny Pratt MP, Member for Frome - EID tags  
**Attachments:** M 230525 Min Scriven - EID tags.pdf

**Categories:** Corro - MP MLC EO

You don't often get email from karen.petney@parliament.sa.gov.au. [Learn why this is important](#)

Good afternoon

Please find attached correspondence from Penny Pratt MP, Member for Frome regarding the implementation of EID tags.

Thank you

Kind regards

Karen

**Karen Petney**  
Electorate Assistant



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The information in this e-mail may be confidential and/or legally privileged. If you are not the intended recipient, access to it is unauthorised and any disclosure, copying, distribution or action taken or omitted to be taken in reliance on it is prohibited and may be unlawful.



**PENNY PRATT MP**  
**MEMBER FOR FROME**

Hon Clare Scriven MLC  
Minister for Primary Industries and Regional Development

minister.scriven@sa.gov.au

Dear Minister

I write on behalf of sheep and farmed goat producers who have contacted me regarding the introduction of the National EID tagging scheme.

It is my understanding it will be mandatory to tag all sheep and farmed goats born after 1 January 2025 leaving property and then all sheep and farmed goats leaving the property from 1 January 2027.

I understand the Federal Government has allocated funds to assist the scheme implementation by subsidising farmers, however it is contingent on each State Government matching dollar for dollar.

Producers are concerned:

- the South Australian Government has not made an announcement about whether subsidies will be payable;
- the increase in cost from approximately 40 cents per tag currently to approximately \$2 each;
- ongoing cost to producers;
- the cost and availability of scanning equipment given national implementation;
- if a subsidy is announced it may not be able to be applied retrospectively.

Minister, time is closing in quickly and on behalf of the producers in my electorate I call on you to announce a subsidy in the upcoming budget as it will potentially lead to a smoother implementation in South Australia.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Penny Pratt'.

**Penny Pratt MP**  
Member for Frome

25 May 2023

**Gonos, Anthea (PIRSA)**

---

**From:** PIRSA:Minister Scriven  
**Sent:** Monday, 24 July 2023 3:16 PM  
**To:** frome@parliament.sa.gov.au  
**Subject:** eA199432 - Minister Scriven Correspondence  
**Attachments:** eA199432 - PRATT MP, Penny - eID - 24072023.pdf

MPIRD: eA199432

Good afternoon

Please find attached correspondence from Minister Scriven regarding the transition to mandatory sheep and goat electronic identification (eID) in South Australia.

Kindest regards

**Office of the Hon Clare Scriven MLC**

**Minister for Primary Industries and Regional Development  
Minister for Forest Industries**

Government of South Australia | 1 King William Street, Adelaide  
GPO Box 1671 Adelaide SA 5001

**T:** +61 8226 2931 | **E:** Minister.Scriven@sa.gov.au

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*The Department of Primary Industries and Regions respects Aboriginal people as the state's first people and nations. We recognise Aboriginal people as traditional owners and occupants of South Australian land and waters. We pay our respects to Aboriginal cultures and to Elders past, present and emerging.*

Disclaimer: The information in this email may be confidential and/or legally privileged. Use or disclosure of the information by anyone other than the intended recipient is prohibited and may be unlawful.



Ms Penny Pratt MP  
Member for Frome  
PO Box 1242  
CLARE SA 5453

[frome@parliament.sa.gov.au](mailto:frome@parliament.sa.gov.au)

Dear Ms Pratt *Penny,*

Thank you for your letter of 25 May 2023 regarding the transition to mandatory sheep and goat electronic identification (eID) in South Australia. I appreciate the need for clarity on how sheep and goat eID will be implemented in our state.

I recently announced that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

The 2023-24 budget package will assist the supply chain in the first stage of the eID transition through:

- a 50% per eID tag subsidy in 2023-24 and 2024-25 for newborn lambs and kids.
- a 75% subsidy on essential infrastructure required for implementation of eID across the supply chain.
- A 50% retrospective subsidisation on all National Livestock Identification System (NLIS) accredited eID tags purchased from 01 January 2023.

Through this package, sheep and goat producers will pay approximately \$1 per eID tag over the coming two years.

I am also pleased to advise you Livestock SA, the peak representative body in the state has welcomed this announcement.

I am committed to supporting the South Australian sheep and goat industry transition to electronic identification to ensure that South Australia's sheep meat, goat and wool sectors which are valued at \$1.6 billion and contributed \$788 million in export value in 2021-22 continue to thrive.

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)



Once again, thank you for writing to me to highlight these important issues associated with the transition to mandatory sheep and goat electronic identification.

Yours sincerely

A handwritten signature in black ink that reads "Clare Scriven". The signature is written in a cursive, flowing style.

Hon Clare Scriven MLC

**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT  
MINISTER FOR FOREST INDUSTRIES**

24/7 / 2023



Government of South Australia  
Department of Primary Industries  
and Regions

Minute to  
**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**



Ref: eA199432

For	<b>Noting and Signature</b>
Critical Date	Routine
Subject	<b>National mandatory introduction of sheep and goat eID in South Australia</b>

### Synopsis

Ms Penny Pratt MP, Member for Frome, has written to you on behalf of sheep and farmed goat producers who have contacted her regarding the impending implementation of mandatory sheep and farmed goat eID in South Australia. Ms Pratt is seeking clarity on eID implementation timeframes and arrangements for funding to support sheep and farmed goat producers to implement eID in South Australia.

### Recommendations

That you:

1. Note the brief

**NOTED**

2. Sign the attached letter

**SIGNED** **NOT SIGNED**

*MS Edits required*

*24/7 CML*

*[Signature]*

Hon Clare Scriven MLC

**Minister for Primary Industries  
and Regional Development**

**Minister for Forest Industries**

*20/7/2023*

**Ministerial Comments -**

## Background

- In 2022, PIRSA's Red Meat and Wool Growth Program provided Livestock SA with \$140,000 to undertake the Sheep and Goat Traceability Project, governed by the Livestock SA Sheep Traceability Steering Committee (the Steering Committee).
- This work commenced in September 2022 with the engagement of a consultant to develop a Business Case for sheep and goat eID in South Australia (SA). The Report was accepted by the Steering Committee and provided to government in February this year.
- Phase 2 of the project, which recently concluded, outlined the Steering Committee's recommended Implementation Plan for Sheep and Goat eID in South Australia. A Communication and Engagement strategy accompanied the Implementation Plan.
- In this report the Steering Committee makes recommendations on how eID might be implemented in South Australia, including key tagging and scanning timeframes, as well as resourcing priorities.
- Recommendations and information provided in both Phase 1 and Phase 2 Reports will help inform government decision making in key areas of implementation timelines, and potential funding support for the sheep and goat industry in South Australia.
- Since receiving this letter from Ms Pratt MP, you have announced that the Government of South Australia will deliver additional investment as part of the State Government's 2023-24 budget to support the implementation of the first stage of electronic identification (eID) for farmed sheep and goats. This includes incentives for supply chain infrastructure and eID tags.
- Victoria implemented sheep and goat eID in 2017. A small group of PIRSA and Livestock SA delegates travelled to Victoria in April to observe sheep and goat eID in operation at saleyards and abattoirs.
- Discussions were also held with Agriculture Victoria staff about the State-administered tag ordering system.

## Discussion

- The South Australian government is committed to the implementation of eID in sheep and goats to improve traceability. Improved traceability provides transparency in the supply chain and enhances our biosecurity. Our trading partners and consumers are increasingly demanding greater assurances in food safety and product traceability.
- Last week you announced that the Government of South Australia will deliver additional investment as part of the State Government's 2023-24 budget to support the implementation of the first stage of electronic identification (eID) for farmed sheep and goats.
- The stage one financial package will include:
  - 75% grant for essential eID infrastructure within the sheep and goat supply chain; and
  - 50% eID tag incentive for producers for the 2023/2024 and 2024/2025 financial years (bringing cost of tag down to approx. \$1).
- Offering financial support for essential eID infrastructure will enable the supply chain to satisfy its regulatory obligations for mandatory scanning and uploading of eID information to the NLIS database



- Clause 9(1) [Redacted]
- Clause 9(1) [Redacted]
- Clause 9(1) [Redacted]
- Tag incentives will be targeted at the approximately 30% of animals that will be retained for breeding. This is to help avoid the need to 'double tag' sheep and goats for movements that occur after 1 Jan 2027.
- In your recent announcement, you also clarified tagging timelines for sheep and farmed goats in South Australia.
- South Australia will transition to electronic identification (eID) in two stages:
  - Clause 3(1) [Redacted]
  - [Redacted]
- Details of financial support criteria and how it will be administered will be carefully worked through in the coming weeks.
- Clause 9(1) [Redacted]
- Coinciding with these announcements, the Livestock SA Sheep and Goat Traceability Steering Committee has recently concluded the industry led project.
- In its reports, the Steering Committee make recommendations on how sheep and goat eID might be implemented in South Australia. The commencement of key tagging and scanning timeframes across the supply chain, as well as resourcing priorities are outlined.
- Information and recommendations found in both Phase 1 and Phase 2 Reports will be carefully considered by government to help inform further implementation and funding decisions.
- SA has seen steadily increasing numbers of eID tags purchased voluntarily by South Australian sheep producers over recent years.
- This trend has rapidly increased this current calendar year with approximately 546,000 eID devices purchased voluntarily (Jan – May 2023), compared with 285,000 tags purchased over the same period last year.
- A letter to Ms Pratt MP has been drafted to clarify the South Australian government's current position on sheep and farmed goat eID implementation support.

### Other Jurisdictions

- WA and NSW have made announcements in areas of key implementation tagging and scanning timeframes, and funding support

- The Western Australian government has committed \$26 million to assist industry transition to mandatory sheep and goat eID.
- WA is the only jurisdiction to commit to a tag incentive or tag discount – with a 75 cent discount given to the purchase of this year's Year of Birth (YOB) colour eID tags (light blue).
- Over 500,000 tags have already been purchased in WA since this scheme was introduced in March.
- Last year NSW published its Industry Implementation Plan for Sheep and Goat eID. This document outlines clear timelines for the tagging scanning of sheep and goats within the NSW supply chain.
- NSW has announced funding for saleyards and processor sector grants to support them in carrying out scoping and planning work to help best plan for eID installation in those facilities.
- NSW has ruled out tag subsidies or incentives, and instead supports the potential for a national tag tender.

#### **Sheep Producers Australia (SPA) Tag Procurement Project**

- An industry led national tag procurement project is currently underway with SPA.
- This project will explore the feasibility of national tag procurement options to support the cost of tags for producers, including a national tag tender.
- The project is expected to conclude around June this year. Sheep Producers Australia will share outcomes from the report with the Sheep and Goat Traceability Task Force (SGTTF) in due course.

#### **Stakeholder / regional impacts, consultation and engagement**

- Livestock SA is supportive of measures that bring the cost of eID tags down for South Australian sheep and goat producers, with belief that producers bear a significant ongoing cost for this reform.

#### **Management of key risks**

- Nil

#### **Legislative and/or financial implications**

- Nil

#### **Attachments**

- A. Letter of response to Ms Penny Pratt MP



for  
**CHIEF EXECUTIVE**  
 Department of Primary Industries and Regions

14/6/2023

<b>CONTACT</b>	Nathan Rhodes
<b>POSITION</b>	Executive Director
<b>DIVISION</b>	Biosecurity
<b>MOBILE and LANDLINE</b>	0412 376 450
<b>Cleared by</b>	Petra Lennon, Principal Policy Officer

**Gonos, Anthea (PIRSA)**

---

**From:** Duan <duan.w@bigpond.com>  
**Sent:** Thursday, 1 June 2023 10:09 AM  
**To:** pkeynes@livestocksa.org.au; treloar.p; PIRSA:Minister Scriven; Livestock CEO; President  
**Cc:** Nicola Centofanti; Nick McBride; Tony Passin  
**Subject:** eID Minority Report  
**Attachments:** Minority Report.pdf  
**Categories:** Corro - General

Attached is a copy of the Minority Report by committee member Duan Williams, for Livestock SA's Sheep and Goat Traceability Steering Committee.

Regards,  
Duan Williams

# Minority Report

from Livestock SA's Sheep and Goat Traceability Steering Committee committee member Duan Williams.

## Executive Summary

I was selected from a number of nominees to be a member of the South Australian Sheep and Goat Traceability Steering Committee, a product of Livestock SA, tasked with developing a business case and an implementation plan for the introduction of mandatory electronic individual identification of sheep and goats in SA. Throughout this process I was presented with numerous documents which included results of studies and trials related to traceability outcomes throughout the sheep and goat industries. Initially I was uncomfortable but prepared that the pending mandate was most likely inevitable. As a prime lamb producer myself and now a representative on this committee for fellow sheep producers, I was determined to secure an exemption from eID tags for vendor bred animals traded directly to slaughter, since I already knew that in this instance there was zero benefit to the sheep producers for the additional costs. However, the more I learnt, the more I questioned the validity of the proposition that an eID system in the sheep industry as a whole could be economically justified. My belief in the possibility that the reported objective to gain near absolute traceability, hence biosecurity and export market security was justifiable soon began to wane. I spent the remainder of this process at odds with the other members of the Steering Committee, seeking adequate justification for their rhetoric. In my opinion none was forthcoming, hence this document describes my rationale to fiercely call for exemptions for vendor bred animals traded directly to slaughter, and even oppose a mandate on individual animal identification as a whole, not only in our State, but nation wide.

To whom it may concern,

As a selected representative of commercial sheep producers on the South Australian Sheep and Goat Traceability Steering Committee, I requested consideration to include in the pending eID mandate, exemptions for Vendor Bred (VB) animals moving directly from their place of birth to slaughter, in loads exclusive to their PIC number, since in this instance there is obviously minimal risk to biosecurity and zero detriment to traceability, whilst saving the sheep industry tens of millions of dollars each year. I submitted a document to the committee outlining my rationale for this request. (see appendix A)

This request was predicated on a number of factors:

#### 1. Traceability

Even with a mandate for eID ear tags, when departing from their place of birth, there is no requirement for these animals to be tagged prior to leaving, in fact due to the much greater expense of an eID tag I have been told by others, and I myself will not tag any sheep until they are about to depart. Thus before leaving, the effect on traceability is indistinguishable, mandate or not.

Upon departure to an abattoir, once the animals board the transporter they are held captive until they reach said abattoir. No animals can enter or exit the truck. At the abattoir, when backed up to the ramp, once the truck door is opened, the onus is now on the abattoir to ensure isolation from other consignments. There is absolutely no risk to traceability, the origin of these animals is indisputable. The addition of an eID tag provides nothing more that is not currently provided with the accompanying signed NVD (a legally binding document) and the NLIS system.

Every producer that I have consulted with, that sells cattle as well as sheep, has confirmed that the eID's in the cattle industry do not solve traceability issues. They routinely have tag numbers of processed animals remaining attached to their PIC numbers on the NLIS system, simply because the processing plants are not removing them when processed, as required. In fact many have told me that they often find that other peoples cattle eID numbers have been transferred to their PIC during processing. Evidently the meat processors to date have had very little regard or concern for traceability, but now with this pending mandate for sheep, I believe they can see an opportunity to have the sheep producers pay for an additional eID system, that will save them cost and effort when processing, hence now they are eagerly using traceability as a disguise to endorse this.

A report produced by SAFEMEAT highlighted through results of the Cowcatcher III exercise that the traceability of cattle, which have been required to be eID tagged for about two decades, still falls well below the National Livestock Traceability Performance Standards. In fact the results from Cowcatcher III are not strikingly better than those of Sheepcatcher II (which is a measure of the current mob based system in sheep), even with this studies conclusions stating non-compliance of NVD's being the system greatest failures. This report has not been made publicly available, perhaps due to the fact that it highlights that electronic individual animal tracing is not the silver bullet to traceability, as we're being led to believe.

If the goal of eID tags in sheep is to enhance biosecurity, a short video titled "Where's Woolly" produced by the NSW Department of Primary Industries (DPI) aimed to explain the need for individual animal traceability, perfectly highlights the uselessness of individual animal tracing in response to a disease outbreak in the sheep (or goat) industry. (see appendix B, Where's Woolly explanation)

How serious about traceability are we really?

As a sheep producer, if I don't pay \$66 to renew my PIC number every 2 years, the penalty is to disallow me from trading.

If I don't complete the LPA Accreditation every 3 years, the penalty is to disallow me from trading.

If I don't accurately fill in an NVD (a legally binding document, the cornerstone to traceability and food safety standards) when trading sheep and keep the NLIS database updated with my mob movements, the penalty is a warning letter. If I am a repeat offender, the penalty is another warning letter, and so on. Whilst the mechanism to be issued with a fine for non-compliance does exist, our committees representative who works within the NLIS system, told me that this is scarcely, if ever, enacted.

So how serious are we about traceability? If it is the dire issue that we are being led to believe, why haven't the failures to comply with the current mob-based system, as indicated by the Sheepcatcher II exercise, been addressed?

## 2. Marketing

I have been assured by the meat processors representatives that our export markets are demanding greater traceability and that in the absence of individual animal identification our products will incur a reduced value.

Firstly, the accompanying NVD for each movement of sheep contains all of the necessary information for that consignment. This, in conjunction with the NLIS database, not only adequately provides the origin, subsequent movements and interactions with other mobs of animals, but also contains all relevant and necessary particulars required to satisfy the Food Safety Standards. As stated on the MLA's website, "NVD's are a legal document that are key to Australian red meats' traceability and market access". In the case of VB to slaughter animals, there isn't anything else to offer, what more will an eID device provide?

Secondly, if this sentiment had any legitimacy, then why after five years of an eID mandate for sheep in the State of Victoria, even today, is there no price difference in sheep meat from Victoria compared to any other State in this country? Five years of real time data indisputably proves that a marketing advantage for eID's in sheep simply does not exist.

Lastly, if or when a marketing advantage does arise for sheep or goats with individual identification capabilities, then naturally the freedom of market forces will elevate them to a premium product, hence a premium price ensues for the producer. (as seen in EU accredited cattle) Producers will be allowed the liberty to determine whether targeting such a market is in the best interest of their individual businesses.

I was told first hand by a founder of Victoria's sheep eID mandate that they excessively rushed the design of their mandate (they "designed it in 3 days") and he believes they made an obvious mistake in not including exemptions for specific scenarios.

NZ have recently reviewed their sheep Traceability in light of the FMD scare last year, and deem that eID'a in their sheep flock is unnecessary. They currently export 9 times more sheep meat into the EU market than we do - it is not about individual animal traceability.

"Sheep largely move in mobs, and much less than cattle between farms, so tracking them at the mob level is likely more practical to achieve for an animal disease outbreak", Stuart Anderson, Deputy Director-General, Biosecurity New Zealand.

(see appendix C)

In fact one of our committee members recently visited NZ and upon returning made note to our committee that "Sheep in NZ don't have ear tags at all!"



The United Kingdom, even with their history of FMD (including a major outbreak in 2001), have included non-electronic tag options for sheep or goats intended for slaughter within 12 months of birth, despite eID tagging became compulsory in 2010.

Not one document nor example of a contract from the meat processors or their customers was presented to our committee to endorse this argument. Any claims that our industries consumers are requesting or requiring individual animal identification are baseless and unsupported hence unreliable. To the contrary, we have years of real time data verifying that there is no market advantage to eID's in sheep.

In our cattle industry there exists a particular market access into Europe, however it is predicated on 'EU Accreditation'. One of the caveats of this access is the annual reconciliation of each accredited producers cattle flock, ensuring that the eID's registered for that PIC on the NLIS system exactly represent the animals in the field. This is quite an onerous task, however since it is rewarded with a premium price, many deem it worthy of the additional effort.

I suggested that if our committee could categorically recommend that there would be no requirement to frequently reconcile eID tags for sheep on the NLIS database, to avoid the extra workload, this would eventually lead to a database that is overrun with tag records that do not exist in the field (animals that have either died in the field or been moved off the associated PIC without the transfer being recorded).

I have been told that after nearly 5 years of eID tags being mandated in Victoria, without the requirement of reconciliation, the 'ghost flock' is in the order of 50 million animals (misrepresented by the database). This is nearly equal to the total number of sheep that exist in Australia.

What are the ramifications of this in the event of a disease outbreak?

Why embark on a mandated eID system, proposed to enhance traceability/biosecurity, when without frequently reconciling the database, the overwhelming records of animals that do not exist in reality will obviously complicate and thwart any tracing processes?

Ergo, I indicated that if this committee recommended that frequent tag reconciliation is required (to ensure the database accurately represents the reality in the field), then every Sheep and Goat producer will most certainly be required to own or have ready access to tag reading equipment (compatible computers and software as well). This equipment, the time and effort to achieve this, must be included in the 'cost of implementation' that the committee presents to Livestock SA.

When I asked the committee what the requirements for reconciliations would be within the eID mandate, I was provided this response:

“PIC reconciliations are not legally required, but are recommended every now and again to ensure the on farm situation matches (as best it can) with the devices on your database account.

It might be practical to do this at shearing, for example, when all sheep on property will be in the yards and can all be scanned.

Currently cattle EU rules require regular pics reconciliations.”

Again, despite my request, not only did the committee not commit to a position on the matter, none of these costs were investigated, hence one can only assume that tag reconciliation, hence the accuracy of the database is of little importance to those driving this agenda. **Or will the necessity to reconcile come later, once the mandate is entrenched and any financial assistance is long gone?**

### 3. Research:

Numerous studies and simulations, in fact the very simulation that Livestock SA cited as the need to pursue an eID mandate, have conclusively proven that the current mob based system is perfectly capable of meeting the of traceability and biosecurity targets, however it is the non-compliance with its requirements that is failing the system.

The Sheep Catcher II exercise did not include failure to identify animals as a “main reason” for not meeting any of the required standards. In fact all of the reasons for not meeting the required standards were non-compliance issues relating to NVD’s. (see Appendix A, page 5 for more details)

The objectives of Exercise Tuckerbox were to “To test and compare the mob-based tracing system for sheep and goats with the device-based tracing system for cattle under the National Livestock Identification System (NLIS), and to develop enhanced tracing tools”

It’s conclusions stated “The NLIS systems for cattle based on individual electronic devices, and for sheep and goats based on mobs, are both capable of tracing for FMD and meeting national tracing standards using the NLIS database as the primary tracing tool. Tracing can be completed using current systems, tools and resources. The NLIS database was efficient and effective. The main limiting factors for tracing for all species are the completeness, timeliness and accuracy of the stock movement data uploaded to the NLIS database, and the availability of staff resources to run and collate database reports in an accurate and timely manner.”

(see appendix A, page 6 for more details)

For reasons unknown to me, it appears that it has not been considered to attempt to rectify these inadequacies first, a potential remedy, which would be relatively simple to implement, with very little additional cost to the industry.

Understanding that I was alone on the committee in wanting to pursue a case for exemptions I called for compelling reasons to deny such exemptions from the other committee members, I was subsequently presented with a list of reasons, more accurately opinions and feelings. To my mind not one was close to compelling, in fact most were insulting and easily refutable using factual evidence. (see appendix D, list of reasons do deny exemptions)

Upon replying to each one of these, citing facts and evidence, I was presented with another list of unsubstantiated, baseless statements. Again, common sense and logic effortlessly contradicts all of these. (see appendix E, 2nd list of reasons to deny exemptions)

I now realised that the remainder of the committee were unwilling to objectively investigate this proposition. It now seemed evident that the outcome of this process was predetermined. I therefore requested costings and analytics be undertaken to compare the relative costs and benefits of eID tagging VB to slaughter animals, in order to allow an economically considered position to be reached. This request was disregarded, no such costings were undertaken, despite the committee having employed a consulting company to undertake cost analysis on all other matters relating to the mandate. (see appendix F, my request for costings)

The position of the Committee regarding my exemption proposal had been minuted as: "If we pressure exemptions, will need to be properly costed", however in Dec of 2022 the committee moved and resolved to deny **any** exemptions (a decision which for sheep producers carries a price tag in the order of tens of millions of dollars, each year, for the rest of time, for zero benefit), without any costings, based on nothing more than innuendo, opinion and the guise of 'Harmonisation'.

Harminisarion had become the buzz word for this committee, which can only be interpreted as a means to a predetermined agenda or an excuse to avoid objective investigation and rational decision making. This in no way puts the interests of South Australia's sheep industry first, as was required from the committees' terms of reference. Since this committee were abundantly willing to settle for the decisions taken elsewhere, rather than investigate the most suitable framework for SA, then why have the committee at all?

The Steering Committee cited results from a survey conducted by Livestock SA to bolster their rhetoric. The analysis of the results showed that they were more than happy include responses that "agreed, somewhat agreed or were neutral" to affirm their position, and more importantly concluded that there was insignificant interest among producers regarding

exemptions, despite the question not even being asked. This survey was treated as one of the premiere sources of consultation, while it is my belief that it provided very little useful data. (see appendix G, my interpretation of the survey)

It is my belief that the sheep producers, the very people to be financially responsible for the outcomes of these decisions, were purposely kept in the dark until the major decisions were secured. Any reported consultations with producers were merely to apprise them on the advancement of the process long after it had begun. I attended one of these at the Naracoorte sale yards, it was attended by about a dozen livestock agents whom had just conducted a cattle sale and two other farmers.

A meeting organised by myself, to allow disgruntled producers an audience with Livestock SA representatives gained about 50 farmers at Lucindale on a 40 degree day, in the midst of our regions grain harvest. I also received 32 messages as apologies for not being able to attend and in support of terminal VB eID exemptions. I achieved this with 3 days notice. A clear indication that true consultation with sheep producers by Livestock SA was not being attempted.

As a side note, whilst I personally payed for both the venue and a secretary to record minutes, and had family members volunteer to organise the set up and clean up of the venue, Livestock SA were happy to include this as one of their own consultations, and before departing, without asking, helped themselves to make copies of the names, phone numbers and email address of attendees that I had gathered on sign in sheets for my own records.

Pondering the disregard shown to objectively designing a plan to suit our States sheep industry, or to possess the gumption to stand apart from the crowd, the composition of the Steering Committee itself had now attracted my attention. I was intrigued, why was I the only one involved that was questioning the motives and the benefits of this very costly endeavor, for seemingly no benefits?

From the committees terms of reference: The members of the Steering Committee shall be;

- 1 nominee from the Livestock SA Board
- representatives including but not limited to livestock agent, saleyard, meat processing, goat industry, transporters and integrity systems specialists.

Of the 12 members, the Steering Committee actually comprised of 3 Livestock SA board members, 2 additional members are also members of SAFEMEAT, an organization which has an obvious agenda to support mandating eID tags (who will not suffer any financial burden due to a mandate).

There are 2 members representing the Saleyards, 3 members don't even live in South Australia and other than listing 'not limited to' - **there is no mention of sheep producers** - who are by far the largest of the stakeholders, in fact the only stakeholder to incur the ongoing costs associated with this mandate.

How can this committee honestly claim to be representative of the livestock industry in South Australia, and its outcomes 'industry led' ???

As it turns out, it appears that I was the only one questioning this venture because I was the only one present that would be personally burdened with the associated costs, for zero benefit, whilst not having a conflicting interest from any other facet.

I have been arguing that the Business Case produced for the Steering Committee as well as being grossly dishonest in its rationale, severely disregards the requirements of the sheep producers. It has been broadly accepted during the construction of this document that the greatest cost to the producers is the cost of the ear tags. My advice to the employed consultants and the committee was that the producers were going to incur significantly increased labour requirements. This report does not include or even acknowledge any costs for this additional labour, which I speculate could easily outweigh the costs of the tags themselves. The Business Case stresses that there will be benefits to the producers own enterprise by utilising the eID tags for data collection and subsequent flock management purposes - whilst only providing provisions for 5% of producers to obtain any type of tag reading equipment!?

It is evident that the compliance rate for missing tags will be raised as part of this mandate, as in Victoria 98% of sheep in a consignment are required to contain an eID tag - our Business Case has provided provisions for 50% of producers to obtain an (1 only) eID tag applicator, and not allowing for an applicator that I would deem appropriate either. (see appendix H, tag applicator comparisons)

Within the distribution of funds, only 2% of producers will have software to manage the eID data, only 2% of producers will have tag reading equipment installed and only 2% of producers will have tag reading equipment retrofitted. By my calculations this will make it impossible for the vast majority of sheep producers to 'better' their enterprise with the (forced) addition of eID tags. (see appendix I, my objections to the business case)

Other matters:

- I recently purchased a truck load of cattle from a local sale yard. When I received the invoice for the transaction I noticed I had been charged a \$2 per head NLIS scanning fee. It is entirely conceivable, more likely probable, that similar fees will become synonymous with sheep transactions. Obviously, as evident in Victoria, additional staff will be necessary to handle the requirements associated with eID scanning and data management in selling centers. All of these added costs will eventually be passed onto and

stay with the producers, the only player in the entire industry without the ability to pass on costs.

- At every opportunity this process has been promoted as “industry led”. By the media, by the committee and by the Minister. Why then are Livestock SA requesting a position from our Agricultural Minister stating “we formally seek the South Australian Government's position to help guide our efforts in representing the interests of our members” (see appendix J, correspondence from LSSA to Minister Scriven)

In what universe is seeking the Governments position to ‘guide our efforts in representing the interests of our members’ allowing the process to be industry led?

I suggest that the livestock producers of South Australia need to seriously asses the caliber of the body that they fund, supposedly to advocate on their behalf. My experience in this process has most definitely proven to me that Livestock SA **are not** working for the interests of livestock producers, in this instance they are in fact actively working against us. Personally I believe this display of insubordinate behavior is grounds for dismissal.

- The thing that frustrates me the most about this entire eID endeavor, is that from all of the research I’ve done and subsequent consideration I have given this matter, I honestly believe the pursuit is futile.

Our mob based system is proven to be effective and adequate to maintain the integrity of our livestock industry. This system is being severely undermined by the non compliance of its requirements. Our cattle industry, which has utilised this technology for around 20 years now, conclusively proves that eID tagging is not the answer to traceability.

I am convinced that the resources administered to mandating eID’s would bear far, far greater reward if used to both ameliorate the current systems non compliance deficiencies and strengthen our border biosecurity.

- Additional information

Appendix K addresses the traceability scenario of a truck rollover.

Appendix L is a copy of a letter I sent to the President and CEO of Livestock SA once the Steering Committees service was completed.

Appendix M is a copy of a letter I sent to Minister Scriven once the Steering Committees service was completed

Written by  
Duan Williams  
Sheep producer,

for Livestock SA's Sheep and Goat Traceability Steering Committee.

This document is to be attached to and distributed with all documents produced by Livestock SA's Sheep and Goat Traceability Steering Committee.

## Appendix A

Exemption from ear tags for 'Vendor Bred to Slaughter'.

Duan Williams

Sheep producer Mt Burr SA duan.w@bigpond.com

Compiled for the South Australian "Sheep and Goat Traceability Steering Committee"

As an appointed representative for sheep and goat producers on the South Australian "Sheep and Goat Traceability Steering Committee" I believe it is my obligation to ensure that the outcomes of this process are equitable, reasonable and cost effective.

As presented to us as committee members,

From Livestock SA, Sheep and Goat Traceability Steering Committee's Terms of Reference:

Background

"The South Australian sheep industry is facing increasing pressure from markets, government, and regulatory bodies to accurately trace livestock through the supply chain. The traceability system in place for sheep (and goats), although improved since first tested in 2007, falls well short of the required National Livestock Traceability Performance Standards (NLTPS) based on the 2016 SheepCatcher II exercise. Non-compliance with these requirements threaten market access and may have severe consequences in event of a biosecurity incursion in sheep cannot be traced through the supply chain. One way for the sheep industry to enhance the traceability and satisfy NLTPS is through the implementation of a national electronic identification (eID) system.

It is well understood that the implementation of a national sheep eID system is inevitable. Livestock SA and the industry more broadly no longer question if, but when eID will become mandatory. National peak industry bodies and other jurisdictions have been exploring options of implementation for several years, with activity in this area increasing significantly since Victoria introduced a sheep eID system in 2019. Pressure to introduce a national system will increase if states do not design and implement an eID program that is suited to their state.

There is currently a window of opportunity for South Australia to undertake a project to strategically approach the decision on when and how a sheep eID system might be implemented here in SA."

2

Last month (Sep 28th and 29th) I attended the committee's first 'face to face' meeting in Adelaide. I personally have reservations about some of the perceived benefits of a mandatory eID requirement for Sheep and Goats, and even question its necessity if the current systems are operating as they should.

The committee members were provided a large number of documents to familiarise us with the current systems, the requirements from the meat and bio-security industries and the considerations and procedures that the state of Victoria utilised when implementing their mandatory eID system for Sheep and Goats.



From this literature and with a number of discussions with fellow producers it became clear to me that rather than a blanket approach across all sheep and goats, an exemption could be made for animals that are being transferred from their place of birth (vendor bred), directly to an abattoir, without compromising any traceability or bio-security issues. In the Victorian's consideration for an equivalent exemption, they estimated that this could apply to a third of lambs produced in Victoria annually.

My immediate concern with mandating an eID system, particularly in relation to this scenario (vendor bred to slaughter), is that the bulk of the associated cost will fall on the producer, providing zero additional benefits to traceability or bio-security.

With this in mind I have prepared the following document:

3

N.B. this paper is written specifically regarding Sheep and Lambs

The Issue:

Since May 2004 Australia has invoked a system designed to provide for rapid traceability of livestock (and stock movements) in the event of any threatening disease outbreak. This system is outlined in the 'National Traceability Performance Standards', as provided at the end of these documents, as Appendix A.

Specifically within 24 hours of a disease report, the location of an animal (the subject of the report) during the 30 days prior must be determinable and any other (susceptible) animals located on any of the PIC (Property Identification Code) locations identified by that first determination, must also be traceable over the prior 30 days within the same 24 hour period. In addition, within 14 days, the lifetime movements of the animal (subject to the report) must be determinable and within 21 days the lifetime movements of all other animals associated with the PIC location, identified above, must be determinable.

The principal driver for the creation and implementation of this system has been the need for a rapid response to any disease outbreak that may threaten our livestock industries.

The Problem:

In 2016 a national exercise (SheepCatcher II), simulating a disease outbreak was conducted in order to test the efficacy of the system at that time. The results from the exercise highlighted failures where levels of traceability were not achieved, prompting the requirement for remediation.

Currently across Australia, before leaving the property (PIC) of an animal's birth, an approved tag (either an NLISID tag with the birth properties PIC number, or an electronic RFID tag) must be applied to each animal. Additionally a NVD (National Vendor Declaration) must accompany the movement of any stock from any PIC location to another PIC location.

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The NVD in addition to certifying the food safety and treatment status of each animal also acts as the movement documentation of the animal's transference between properties, to saleyards or abattoirs for slaughter. As stated on the MLA's website, "NVD's are a legal document that are key to Australian red meats' traceability and market access".

SheepCatcher II

<https://www.sheepcentral.com/wp-content/uploads/2017/03/SheepCatcher2Summary-FINAL.pdf>

The SheepCatcher II exercise published results as well as listing the “main reasons for not meeting standards”, for both standards 1.1 & 1.2 and standards 3.1 & 3.2 of the ‘National Traceability Performance Standards’ (Appendix A)

The main reasons for not meeting standards 1.1 and 1.2 are:

- Difficulty verifying slaughter of saleyard lines often split and killed over several days.
- Failure of saleyard post-sale documentation to reconcile with abattoir kill.
- Incomplete NVDs.
- The lack of on-farm storage of NVDs. The NVDs were not kept for the required timeframes as stated in the NLIS-S&G Business Rules.
- The lack of resources for tracing against the 24 hour time constraints.
- The 24 hour reporting period was not adjusted for the exercise as it was for the 14 and 21 day points.

• The difficulty of tracing cross-border stock movements

The main reasons for not meeting standards 3.1 and 3.2 are:

- Incomplete NVDs.
- The lack of on-farm storage of NVDs. The NVDs were not kept for the required time frames as stated in the NLIS-S&G Business Rules. Due to

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the age of some of the sheep, some movements were outside the legal requirements to retain.

- The difficulty of tracing cross-border stock movements.
- The lack of resources for tracing against the time constraints.
- Reluctance of supply chain entities to provide archived NVDs in a timely manner per requests.
- The tracing of older stock that were born prior to the introduction of the NLIS S&G in 2010.
- Staff disengagement due to length of the exercise and requirements to perform normal duties and participate in real outbreaks.

The Solution:

It seems that there is a widely held belief that the solution to the problem is simply to insist on the replacement of NLISID (visual tags) with RFID (electronic tags), notwithstanding the SheepCatcher II exercise not listing animal identification failure as a “main reason” as detailed above.

Indeed it seems that the “main reasons for not meeting the standards” were in fact non-compliance problems associated with the NVD’s.

To wit:

- Failure of sale yard post sale documentation to reconcile with abattoir kill
- Incomplete NVD’s
- The lack of on farm storage of NVD’s
- The difficulty in tracing cross border stock movements (which I can only assume is referring to a break down in NVD documentation, which should accompany all stock movements, inter and intra state)

Any move to strengthen the system, enhancing the traceability outcomes to meet our goals, will continue to rely upon NVD's.

As noted above, the NVD is akin to a livestock passport. It is the documentation that details the movement of livestock from one PIC to another. The NVD will, necessarily, continue to be the 'document(s) that are key to Australian red meats' traceability and market access".

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This point must be emphasised and reiterated because any failure to recognize the 'key' role played by the NVD will undermine any efforts to improve the system. In reality, the system could be made work (obviously with some difficulty) without any animal ear tags at all, but could not be made work without NVD's.

The Proposal:

I propose that animals that are consigned to an abattoir for slaughter, from their PIC of birth, in a load exclusive of animals from another PIC, should be exempted from having an identifying tag.

The Argument:

My proposal is made because in the case where an animal is loaded from its place of birth and unloaded into an abattoir lairage (thenceforth isolated from animals with differing PIC's), with the accompanying NVD, is absolutely identifiable and traceable without the need for an ear tag. Any ear tag in this scenario is completely superfluous to the traceability task and only adds unnecessary work burden and cost for no tangible benefit.

Whilst I understand that one of the hoped outcomes of RFID tags is automation of movement data, as in all systems, perfection is unachievable and as such it is my belief that human input will always remain a part of the system. Even though an RFID tag will identify the animals PIC, the food security information will still need to be uploaded from the NVD and the PIC matched to that NVD.

Interesting insights are revealed in the 10 year old report of the New South Wales Department of Primary Industries titled "Exercise Tuckerbox" (a Foot and Mouth disease desk-top tracing exercise conducted in NSW in April 2012)

Exercise Tuckerbox:

[https://www.dpi.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0010/469648/Exercise-Tuckerbox-2012-final-report.pdf](https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0010/469648/Exercise-Tuckerbox-2012-final-report.pdf)

Objective: To test and compare the mob-based tracing system for sheep and goats with the device-based tracing system for cattle under the National Livestock Identification System (NLIS), and to develop enhanced tracing tools.

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Conclusions: The NLIS systems for cattle based on individual electronic devices, and for sheep and goats based on mobs, are both capable of tracing for FMD and meeting national tracing standards using the NLIS database as the primary tracing tool. Tracing can be completed using current systems, tools and resources. The NLIS database was efficient and effective. The main limiting factors for tracing for all species are the completeness, timeliness and accuracy of the stock movement data uploaded to the NLIS database, and the availability of staff resources to run and collate database reports in an accurate and timely

manner. More automated tracing tools for extracting and collating data from the NLIS database would be useful and are under development.

Whilst the conclusions do highlight some shortcomings (hopefully there has been improvement in 10 years), it doesn't suggest that any perceivable differences exist between the sheep mob based visual ID and the cattle individual based QFID system, especially given that this was the stated objective of the exercise.

Indeed on page 5 under the heading "Using the NLIS database" the discussion notes that summary reports for cattle movements were used in preference to detailed reports containing RFID data. This is further noted at pages 13 & 14 where it is stated "that detailed database reports which listed all RFID's would have slowed down tracing due to the greater volume of data to collate, summarise and assess." Noting that 581 lines of data (representing mobs) were copied and pasted in several seconds, where as this represented 3138 animals, which would have taken much longer.

In the case of sheep of course, the discrepancy (and thus time performing the analysis) between mob and individual based data would be significantly greater.

Notwithstanding, I recognise that in circumstances where sheep from different PIC's, for example those trading through saleyards, coming out of feedlots or being co-consigned on the same transporter would potentially yield better traceability outcomes with individual tags, visual or RFID. I use the word potentially because of having worked with sheep all of my life, I know that physically scanning the numbers of sheep and lambs at saleyards and abattoirs with absolute accuracy will certainly be problematic.

End document.

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Whilst discussing the framework for South Australia's eID system at the committee meetings, the topic of exemptions was mentioned and just as quickly discarded, by the entire committee. Not being comfortable with the ease at which the topic had been abandoned, at the next appropriate moment, I redirected the committee to again discuss the possibility of an exemption for "vendor bred" animals going directly to slaughter. Without any support for the proposition, I was given the following rationale for disallowing such an exemption:

- The abattoirs lairages are not sufficient to guarantee separation of consignments
- The overseas meat industries require it for marketing and trade
- The Saleyards and Stock Agents would be disadvantaged
- It is simpler to mandate for all, an exemption would be too difficult and confusing to implement

I don't believe that any of these reasons are adequate, some even plausible in disallowing the exemption being proposed, I will explain my thoughts on each;

The abattoirs lairages are not sufficient to guarantee separation of consignments.

If a traceability issue arises within abattoir lairages, it is ridiculous to seek to overcome this by imposing a costly and time consuming impost upon producers. When sheep/lambs are sold on 'over the hooks' basis the meat processor has a contractual obligation to pay the producer for their animals as unloaded from the transporter. Are the processors saying that they are not capable of meeting their side of that contract? If this is the case it opens up a whole new area of investigation in this part of the industry! In any case the processors

should ensure the integrity of their operation and not seek to impose costs onto others to mask their inadequacies.

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The overseas meat industries require it for marketing and trade.

I'm quite willing to accept that, at least some markets, want a high level of traceability. Lets not forget, my proposal has no impact on traceability, the presence of an electronic ear tag in no way enhances the traceability of any of the animals consigned per this proposal. It is also worth noting that the Australian meat industries are currently enjoying a buoyant time, no doubt underpinned by market demand. There is no evidence that this demand is in any way undermined by the lack of electronic ear tags. Indeed if a market advantage were to flow, surely Victorian producers, who have been mandated to use such devices since 2019, would currently be accruing a benefit. There is clearly no such price differential between Victorian sheep and those supplied from South Australia. The evidence of the current market place dispels this argument as having any legitimacy.

I'd suggest that if the processors can in fact value add their products through the use of eID devices, either they allow a 'free market' to make those animals a premium, and compensate the producer accordingly, alternatively the processors can put the devices in the animals themselves, directly prior to slaughter, at their own cost (since the only possible traceability issue is post transport).

The Saleyards and Stock Agents would be disadvantaged.

I was of the understanding that the objective of mandating eID tags was about traceability. It seems that some sectors of the industry see this as an opportunity to protect their own interests. This is not irrational in the sense of human behavior but should not be entertained as a reason for not making sound decisions on the topic at hand. The reality is that a portion of livestock trading is undertaken through the saleyard system and a portion is transacted outside of that system. Saleyards have both advantages and disadvantages which no doubt influence producers decisions regarding the marketing of their livestock. It should not be our role to impose a cost and effort burden on any producer in order to influence those decisions. We would not condone an edict, which mandated that all livestock transfers could only be transacted through the saleyard system, as this would be anathema to our freedom to trade. Likewise we should no seek to restrict open trade by imposing unnecessary costs on producers, especially for zero gain.

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It is simpler to mandate for all, an exemption would be too difficult and confusing to implement.

Is this suggesting that producers are incapable of working within a system with a very specific exemption, or is there some other party whose capabilities are limited? Many producers manage multiple breeds, blood lines, genetic variations, as well as having access to hundreds of APVMA registered chemicals each containing unique conditions of use and withholding periods. I can only assume that those who claim that the level of difficulty in managing an exemption as I have proposed, have not applied up to 700 ear tags to even one B-Double load of 'prime lambs', as they obviously have a limited understanding of the term "difficult". As to the term confusing, I would be deeply offended if it were suggested that

producers would be confused by this exemption. The exemption I am proposing is very simple, no if's, but's or however's – from property (PIC) of birth to slaughter with no mixed loads! I fail to understand how this could possibly be a plausible reason for denying this exemption.

It is worth noting at this stage, a quote from Peter Drucker, known as the founder of modern management;

“There is nothing so useless as doing efficiently that which should not be done at all”

One would be forgiven for believing that he was specifically speaking to the notion of putting an ear tag in an animal to confirm what we already know – it was consigned from its place of birth for slaughter, in isolation from any other animals.

No matter how efficiently we either apply or read the tag, we will gain absolutely no new knowledge.

An eID system will be implemented, nation wide. This exercise is about traceability, no more, no less. If the decision makers do not accept the call for an exemption in the specific case of animals moving from their place of birth directly to slaughter, on a transporter exclusive to that birth PIC, they must give cogent reasons as to why this cost and effort impost is necessary.

In the absence of proof of need and a cost benefit analysis, demonstrating both the necessity and the fact that the cost is outweighed by the benefit, I can only insist that South Australia require the exemption as I have proposed.

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## Appendix A:

### 1.1

#### National Traceability Performance Standards

The 'National Traceability Performance Standards' were endorsed by PIMC in May 2004. These performance standards are a result of consultation with State and Territory technical advisors. It is envisaged that all States and Territories will aim to meet these standards. Annual audits will be undertaken by Animal Health Australia as a process for continual improvement. It must be noted that it will take some time for the Performance Standards to be met as the introduction of NLIS has only recently occurred.

Within 24 hours of the relevant CVO2 being notified<sup>3</sup>, it must be possible to determine the location(s)<sup>4</sup> where a specified animal was resident during the previous 30 days. Within 24 hours it must be also possible to determine the location(s)<sup>4</sup> where all susceptible animals that resided concurrently and/or subsequently on any of the properties on which a specified animal has resided in the last 30 days.

Within 48 hours of the relevant CVO2 being notified<sup>3</sup>, it must be possible to establish the location(s)<sup>4</sup> where a specified animal has been resident during its life.

Within 48 hours of the relevant CVO2 being notified<sup>3</sup>, it must be possible to establish a listing of all cattle that have lived on the same property as the specified animal at any stage during those animals' lives.

Within 48 hours of the relevant CVO<sup>2</sup> being notified<sup>3</sup>, it must also be possible to determine the current location<sup>4</sup> of all cattle that resided on the same property as the specified animal at any time during those animals' lives.

Within 14 days of the relevant CVO<sup>2</sup> being notified<sup>3</sup>, it must be possible to determine all locations<sup>4</sup> where a specified animal has been resident during its life.

Within 21 days of the relevant CVO<sup>2</sup> being notified<sup>3</sup>, it must also be possible to determine the location<sup>4</sup> of all susceptible animals that resided concurrently with a specified animal at any time during the specified animal's life.

Applicable to all FMD susceptible livestock species<sup>1</sup>

1.2

Applicable to cattle only<sup>5</sup>

2.1

2.2

2.3

Applicable to all FMD susceptible livestock species except cattle (lifetime traceability excluding the preceding 30 days - addressed by 1.1 and 1.2 above)

3.1

3.2

Notes

1. For the purposes of these Standards, 'FMD susceptible species' means cattle, sheep, goats, and domesticated buffalo, deer, pigs, camels and camelids.

2. 'The relevant CVO' means the State or Territory Chief Veterinary Officer, or their delegate, in the jurisdiction where the specified animal is located or has been traced to.

3. For the purposes of these Standards, the term 'notified' means the relevant CVO is aware of an incident that required tracing.

4. 'Location' means any definable parcel of land including (but not limited to): any parcel of land with a Property Identification Code, travelling stock routes, saleyards, abattoirs, feedlots, live export collection depots, show grounds, Crown land and transport staging depots.

5. 5. Given the risks posed by BSE, it was considered appropriate to establish separate Standards for cattle.

## Appendix B

# Where's Woolly

This video was produced by the NSW DPI and sent in conjunction with Livestock SA's latest newsletter. I can only assume as an explanation for the benefits of transitioning from mob based animal tracing to individual animal tracing, in the case of a disease outbreak.

If you haven't viewed this video, here is a link:

<https://vimeo.com/767161082?ref=em-v-share>

The video titled "Where's Woolly" produced by the NSW DPI perfectly highlights the uselessness of individual animal tracing in response to a disease outbreak in the sheep (or goat) industry.



The pathway shown, in the screen shot above, of potential contamination, through mob based tracking is correct, necessary and adequate to track and respond to a disease outbreak.

The video then continues:  
"Now let's find Woolly"  
(With the aid of our eID devices)





That's great we have found Woolly, by using the NLIS system to determine the path Woolly may have taken (or may not have taken) then running potentially all sheep on the final destination property through past a reader with eID scanning and processing capabilities, until Woolly is physically obtained.

All for what benefit ??

Are we still tracking a disease or is the goal now to get our hands on Woolly ?

This video implies that we no longer need to be concerned with the 'Saleyard', 'Feedlot', or 'Export Depot'? O' wait....., what about the 26 other destinations of infected rams????

Despite finding Woolly, the disease has still potentially come in contact with this many sheep; (as shown in the screen shot below, the same one from the beginning, using mob based tracing)



There is no reduction in the avenues of tracing by finding Woolly's exact location. All that matters is where have any comprised sheep moved to - which mobs are they a part of now.

Finding Woolly, through hundreds of millions of dollars of eID's, application and scanning equipment, gives absolutely no advantage in tracking a disease.

The closing statement of this video:

"The time to contain a disease is reliant on the rate of traceability available. As a component of the whole system, eID helps us to trace specific stock, and know which others had contact with them, improving our rate of detection, containment and response."

Let's break this down.

- "The time to contain a disease is reliant on the rate of traceability available."

As explained in my document produced for the South Australian Sheep and Goat Traceability Steering Committee:

"Exemption from ear tags for 'Vendor Bred to Slaughter'"

From 'Exercise Tuckerbox':

"Objective: To test and compare the mob-based tracing system for sheep and goats with the device-based tracing system for cattle under the National Livestock Identification System (NLIS), and to develop enhanced tracing tools."

"Indeed on page 5 under the heading "Using the NLIS database" the discussion notes that summary reports for cattle movements were used in preference to detailed reports containing RFID data. This is further noted at pages 13 & 14 where it is stated "that detailed database reports which listed all RFID's would have slowed down tracing due to the greater volume of data to collate, summarise and assess." Noting that 581 lines of data (representing mobs) were copied and pasted in several seconds, where as this represented 3138 animals, which would have taken much longer."

It has been proven and documented that individual based tracing systems in fact slow down animal tracing.

- "As a component of the whole system, eID helps us to trace specific stock, and know which others had contact with them"

The mob based system has every capability required to meet these objectives, since once a compromised animal is in a mob, from then on it is only the mob that is important. The

ability to trace individuals is of no benefit to tracing a disease, in fact as explained above is only a hindrance.

- “improving our rate of detection, containment and response.”

Really? I’ll need an explanation for this statement, since this conclusion is obviously not deduced from the “Where’s Woolly” video, and contradictory to the findings of ‘Exercise Tuckerbox’.

The detection, response and containment of a disease outbreak gains absolutely no advantage with the addition of individual animal tracing. The complication of excess, unnecessary data only thwarts the crucially time sensitive reaction.

I invite anyone to prove otherwise.

It beggars my understanding why the Australian meat industry is embarking on this exercise where my own research has failed to show any benefit, least of all significant benefit, to be gained. I would be pleased if someone could explain what I may be missing.

Lastly, I’m not sure which concerns me the most, the fact that the NSW DPI produced this, or that our own Livestock SA are seemingly happy to distribute it, believing it is promotional material?!

## Appendix C

<https://www.rnz.CO>.

[n/national/programmes/countrylife/audio/2018851347 /as-australia-beefs-up-sheep-tracing-should-nz-follow-suit](https://www.rnz.CO/national/programmes/countrylife/audio/2018851347/as-australia-beefs-up-sheep-tracing-should-nz-follow-suit)

New Zealand's system of tracing sheep movements around the country could be a weak link in protecting against foot and mouth disease, according to a biosecurity risk expert.

However, Aaron Dodd of the Centre of Excellence for Biosecurity Risk Analysis (CEBRA), says overall New Zealand is in a "really good position" to deal with any outbreak.

Farmers here use a paper-based system to identify and trace whole mobs of sheep as flocks move between farms, saleyards and slaughterhouses, although the industry is encouraging farmers to move online.

The tracing system for sheep is different from the system for cattle and deer, which must be individually tagged under the National Animal Identification and Tracing (NAIT)

Dodd, who is CEBRA's chief investigator and deputy director, said New Zealand is at an advantage because its system has been recently tested by mycoplasma bovis in cattle.

However he pointed to a recent decision by Australian agriculture ministers to beef up their sheep tracing system in light of Indonesia's foot and mouth outbreak.

The ministers met last week "noting the urgent need for a national mandatory individual identification system for sheep and goats that is practical to implement, industry led and cost efficient", according to their communique.

If there's a foot and mouth incursion, New Zealand and Australian policy is to stop stock movement for 72 hours "to be able to do the contact tracing and get ahead of the virus," Dodd said.

He said "sheep catcher" exercises to test the system in Australia showed the 72 hour target could not be reached using the existing mob-based tracing system.

"Based on the advice that I've got from people that were involved in the UK (foot and mouth) experience, their view is that electronic traceability for all susceptible livestock for these kinds of infectious diseases makes a significant difference."

"Because the virus is so infectious, if we don't have the systems that enable us to do that then potentially that is a significant weakness."

Stuart Anderson, Deputy Director-General, Biosecurity New Zealand, said a review is being undertaken to improve the way sheep are traced in New Zealand.

Individual tracking does not appear to be on the horizon, however.

"Sheep largely move in mobs, and much less than cattle between farms, so tracking them at the mob level is likely more practical to achieve for an animal disease outbreak," he said.

Every time sheep change hands, the person in charge has to fill out an Animal Status Declaration (ASD) which records the number of animals and details like time since drenching.

Beef and Lamb NZ insists the ASD system is robust even though it is essentially "being held in a filing cabinet", according to Senior Advisor for Biosecurity and Animal Welfare, Will Halliday.

The organisation is keen to see farmers make their ASDs online, a system that is being introduced.

"In the event of an outbreak to determine the traceability of those sheep an investigator would have to go to the holder of that piece of paper which is time consuming and resource consuming," Halliday said.

Beef and Lamb NZ is working with OSPRI and the Ministry for Primary Industries to make improvements to electronic tracing of sheep mobs using eASDs.

"There's really no need to have individual animal identification because what we're trying to determine is a linkage between two locations - where the sheep have come from and where they're going. Because they tend to move in mobs it is the mob that we want to be able to trace," Halliday said.

New Zealand has brought in disinfectant footbaths, an awareness campaign and increased surveillance at the border since the Indonesian foot and mouth outbreak.

Ensuring lifestyle block owners and people in towns and cities are aware is critical, according to the biosecurity risk expert Aaron Dodd.

He said it is important to bear in mind New Zealand has never, unlike Australia, had a foot and mouth incursion.

"Foot and mouth disease has been endemic in large parts of the world since it was first discovered in Italy in the 1500s and the measures that we've deployed to date have been successful at keeping foot and mouth disease out."

"We can only assume ... enhanced measures will be enough to deal with the increased risk.

"With (the Indonesian outbreak) showing early signs of coming under control, we can be confident that New Zealand is in a really good place to be prepared for an outbreak," he said.

## Appendix D

### Concerns Answered

Hi all,

Below I have listed and responded to each of the concerns raised and recorded in our last meeting regarding the exemption for the vendor bred to slaughter proposal.

In order to assist with legibility and organisation I have formatted the concerns with italics followed by my responses as normal text.

A few are almost duplicates, but I've done my best to offer the relevant information to each one.

Thank you for providing me with these concerns. It is important that we explore and debate all of the consequences of our decisions.

*"There is the opinion that there is no compelling reason or benefits for tags, either visual or eID for vendor bred lambs that go direct to slaughter. "*

*-what are the number of people that have this view vs the number of people that don't?*

What does it matter 'how many people have this view'? This is not decided by a vote.

Either there is a compelling reason or there is not.

The only dispute to follow is what constitutes 'compelling'. This is why we have employed ACIL Allen, to apply monetary figures to the net results of our decisions?

#### Opposition for the Vendor Bred Direct to Slaughter tag free movement

*- Supply chain members have been very clear that there needs to be national harmonisation.*

I do not have an issue with the ideology that the system will be advantaged through harmonisation. I do however question why this appears to automatically imply that any exemptions should not be allowed. Why shouldn't we advocate for the National system to include an exemption.

Why can't we be the leaders? Like our state was with deposits on recyclable drink bottles and containers. Like our state was on banning single use plastics, of which I deem an ear tag in lamb destined for slaughter comparable.

If we're not willing to promote a system that is proven to be rational, then why have we formed this committee?

This has been touted as a fundamental argument against an exemption, when in fact I see it as an excuse to avoid admitting that rational and cost effective benefits to tagging animals per this proposition simply do not exist.

*-Pathway through the supply chain with exemptions will send unclear messages to our key stakeholders and export parties*

This is a very subjective statement. I can just as easily state, "A pathway through the supply chain with exemption exhibits consideration and upmost confidence in our systems, thus our industry"

I'm not sure what you mean by 'unclear messages'. What messages?

If you're implying that traceability is compromised, please explain where and how?

How about this message, "it is indisputable that animals traveling from their birth place directly to slaughter, in loads exclusive to their pic, require nothing more than the signed NVD in conjunction with the NLIS database to be 100% traceable. "

Why would our key stake holders and export partners care if there is an exemption, or ear tags for that matter? The question is, are the animals lifetime traceable - to which the answer is, yes they are.

*- Current minimum standard and guidelines is for every animal needing a visual tag and we will not go below that standard.*

The sheer existence of a needless and useless requirement is hardly grounds to insist that it remain.

The evidence clearly shows that a benefit, from either a visual or eID tag, in the case of this exemption, does not exist.

We have an opportunity here to right a wrong.

I have my own theory on the basis of the prior mandate on visual tags, and it does not include a benefit to the industry!

*- This will create weakness in the traceability system that we are trying to strengthen.*

Simply not true. Explain where you believe the weakness can occur?

Even with a mandate for ear tags, when departing from their place of birth, there is no requirement for these animals to be tagged prior to boarding the truck.

Thus before leaving the property, the effect on traceability is indistinguishable, mandate or not.

Once the animals board the truck they are held captive until they reach the abattoir. No animals can enter or exit the truck. At the abattoir, when backed up to the ramp, once the truck door is opened, the onus is on the abattoir to ensure isolation from other consignments.

Show me the weakness?

The animals are 100% traceable.

*- Would need to be total loads from properties and there wouldn't be any position where there could be mixed loads*

Correct, as per the requirements of the proposal. The size of the load is irrelevant however, livestock trucks come in all sizes. Providing the animals are exclusive to the load, and from their place of birth, they are eligible for the exemption.

Millions of lambs eligible for this exemption are transported to abattoirs every year. Forcing these animals to carry an eID, for no longer than 48 hours, is an ongoing, relentless cost for the rest of time - gaining nothing.

No matter how efficiently we either apply or read the tag, we will gain absolutely no new knowledge.

*- From a PIRSA perspective*

*o Completely disagree that eID for vendor bred to slaughter doesn't have traceability benefits.*



So what are the benefits you're referring to? A baseless statement. If you're going to claim that something exists, please state what it is.

Tell me even one thing that can be gained from a tag in this scenario that isn't already provided with the NVD?

"No matter how efficiently we either apply or read the tag, we will gain absolutely no new knowledge."

*o Biosecurity and traceability is about managing risk and unidentified animals in the system increases risk.*

What risk per this exemption, specifically? Explain your claim.

A mandate on eID's is going to dramatically increase the number of 'unidentified' animals in the system. Most will not be tagged until they leave their property of birth. And not just lambs, include ewes, wethers and rams.

This statement actually supports my position that a mandate on eID tags in any sheep does nothing to improve biosecurity. Refer to my Where's Wooly explanation.

*o This will also delay the time of tagging which can create other issues including traceability during a fire when the fences are ruined, in the instance of a truck roll over, and accidental mixing with other unidentified mobs.*

In the event of accidental mixing of mobs due to fire, flood, truck rollover etc, specifically what benefit is there in individually identifying an animal?

In all of these instances, all animals deemed to be mixed or loose (are not within the confines of their pic) are treated as a 'mob'. They have to be, since the interactions between the individuals is completely unknown.

If, in addition, there happened to be a disease outbreak, and through the NLIS system an association with any pic's in the vicinity of this event (fire, flood, rollover) was made, obviously this 'mob' (in it's entirety) and any neighboring mobs (pics) would be quarantined, and subjected to the appropriate protocols. Even if this mixed mob has already been sorted and disbanded, the response is still the same, necessary, and adequate.

Refer to my Where's Woolly explanation. Replace any of the venues (eg wattle downs, feedlot etc) in this scenario with a tipped over truck, the resulting response is exactly the same.

There are protocols in place for the management of animal transport accidents

The NLIS system manages the movements of all sheep in and out of such an 'event' vicinity. Individually identifying animals has no practical purpose, other than to draught the mob back into its components to return to their owners. This has no bearing on biosecurity.

Anyone who has experience working with sheep can verify that visually draughting mixed mobs is achievable, with surprising accuracy, due to the fact that sheep do not all look the same. Especially between different pic's, there is such a minute chance that the components of a mixed mob are all the exact same age, of the same breed, with an indistinguishable length of wool, of which is tainted with the same color dust.

*o Also, opportunities for a status to be applied to tags of sheep that should not enter the supply chain due to treatments.*

The eID tag contains nothing but a unique number (code). A status can not be applied to a tag.

The requirements for meat safety standards is that vendors sign the NVD, stating that all APVMA requirements have been met.

Outside of this, all treatment information is commercial in confidence.

*o eIDs can be used for Emergency Animal Disease proof of freedom.*

There is nothing to gain from identifying individuals here.

Refer to my explanation of the Where's Woolly presentation, this has to and will be done as a mob based system. The interactions of the individuals are unknown.

Additionally see my comments regarding 'Exercise Tuckerbox'

"Indeed on page 5 under the heading "Using the NLIS database" the discussion notes that summary reports for cattle movements were used in preference to detailed reports containing RFID data. "

*o eID tags will protect us in the event of mixed mobs through the supply chain, which can happen.*

Within the confines of this exemption, where are mobs getting mixed? It cannot happen in the truck. The only place this can happen is in a lairage.

As pointed out, this is the responsibility of the abattoirs. As such they should not seek to impose costs onto others to mask their inadequacies.

*o Individual animal life history recorded on a device can help to rectify a problem with traceability.*

Incorrect. The eID device only contains a number (code), it cannot be written on.

The NLIS database is where the animals origin and subsequent movements are recorded, which is being done via mob based NVD records.

What problem can arise with traceability that requires an individual animal be identified?

Refer to my Where's Woolly explanation.

*- From a processor perspective*

*o The processors do not want exemptions.*

How about that - commercial lamb producers do.

Shouldn't we be making these decisions based on sound evidence and cost benefit analysis, as opposed to gut feelings and emotions?

*Our customers are demanding greater traceability, and they are very excited about RFID.*

'greater traceability' ?????

You already know everything there is to know about the animal.

It was born on the property indicated on the NVD - it was transported to an abattoir and processed, the end.

We do not have any further information to give. Would they like us to name the animals, or perhaps record the dates and times they are moved between paddocks?

All other treatments are commercial in confidence.

This is a nonsensical statement.

Let's be clear about the requirements, what specifically do the customers demand? I believe it is lifetime traceability, not ear tags per se.

An ear tag does not define traceability.

What is it specifically about an RFID that they are excited about?  
What additional information do they believe it will contribute?

If in fact you actually mean 'our customers are demanding eID's', then by all means, apply eID tags to the lambs as they're unloaded at the processing plant.

If there was an economic gain to be had, this would already be happening.

I'm getting tired of hearing that the 'markets require this', without a shred of evidence.

Indisputable evidence to the contrary is staring us in the face. We have a 4 year live trial in Victoria to learn from. If a market requirement for eID devices truly exists, the animals produced in Victoria, which have contained eID devices for years now, would be attracting a market advantage. This is indisputable.

This clearly does not exist, hence neither does the legitimacy of the claim.

*Our customers will not be supportive of no tags for Vendor Bred Direct to Slaughter.*

Why not? There is evidently no traceability issue. Everything there is to know about the animal is known.

Do they collect the tags and subsequently use them for another purpose?

The ear tags certainly serve no purpose between the farm gate and the processing chain.

For what specific reasons will they not be supportive?

It seems that there is a huge misapprehension about the role of an ear tag, of any type;

An ear tag does not define traceability.

*NZ currently do not have RFID in their sheep, and this is going to be a real opportunity for our sheep industry.*

I'm all for increasing our market share, but call me a cynic, the first thing that comes to mind is, "we may achieve an edge on the competition"

The same scenario has been running for some years now due to the Victorian mandate, yet the real life evidence has proven the market place sees no benefit.

If processors are so convinced of the merits, they can apply eID tags to the lambs as they're unloaded at the processing plant.

*o If there is not a tag in their ear, it will be that those animals are discounted because they cannot go into a specific premium market.*

On what grounds? An ear tag is just a piece of plastic.

The only thing that makes an ear tag useful is the NLIS system.

This statement is unfounded. It is the traceability through the NLIS that ultimately enhances market access.

Animals traveling from their birth place directly to slaughter, in loads exclusive to their pic, require nothing more than the signed NVD in conjunction with the NLIS database to be 100% traceable.

If your statement were indeed true, and since you also claim eID tags increase traceability over visual tags - wouldn't the same discount apply between visual and eID tags? (Which claim do you choose, you can't have both, they are conflicting!)

Clearly this is not the case since my lambs continue to fetch the same price as the Victorians' lambs.

Regardless, allow the market to dictate this. If the market place reflected these claims (which it clearly does not) producers would react to the market signals, thus a mandate is unnecessary on marketing grounds.

*- There is more than just biosecurity when we talk about traceability, it is about market access regarding residues from treatments that need to be traced.*

Agreed, but nothing that NVD's and mob based tracing can not provide.

See the results from "Sheepcatcher II", the trials have been done, and the results show that our current mob based system is capable in every way necessary.

When a residue is found during processing, how is there any doubt as to which consignment the animal belongs to?

This implies that our contracts with the processors are being breached?

The only weakness is the non compliance with the requirements of the NLIS system, which for reasons unknown to me, despite questioning this in meetings, nobody seems to care about.

*Biosecurity problem that we have encountered with the auditing through the processing system.*

The residues need to be able to be traced, and without a tag you cannot.

Nonsense. Simply untrue. The mob based NVD system is proven to be adequate. Refer to Sheepcatcher II.

When a residue is found during processing, how is there any doubt as to which consignment the animal belongs to?

This implies that our contracts with the processors are being breached?

*- For harvested rangelands goats, there will be permits required and different compliance requirements including audits in place to be able to maintain that tag free movement.*

*Once a goat is farmed or has had treatments then it must be tagged.*

*There is no appetite nationally for any variations or exemptions.*

Are we making decisions involving a mandate to the tune of tens of millions of dollars based on the perception of appetite?

Should we cease investigating the merits of each consideration on account of this?

At this point, why would we be concerned with rumors regarding the National system?

From our terms of reference, we have been tasked with:

- enhance South Australia's sheep supply chains' understanding and acceptance of an eID system for sheep

- help industry and government make informed decisions about the design, timing, policies and programs needed to realise an effective eID system for the South Australia's sheep industry.

I will continue to seek factual evidence to support my claims.

*Any system needs to be national, and it is not in the discussion.*

Again, I do not have an issue with an ideology that the system requires harmonisation. I do question why this seems to automatically imply that an exemption not be allowed.

Why can't we advocate for the National system to include an exemption?

Why can't we be the leaders? Like our state was with deposits on recyclable drink bottles and containers. Like our state was on banning single use plastics, of which I deem an ear tag in a lamb destined for slaughter comparable.

If we're not willing to promote a system that is proven to be reasonable, then why have we formed this committee?

This has been touted as a fundamental argument against an exemption, when in fact I see it as an excuse to avoid admitting that any benefit to tagging animals per this proposition simply does not exist.

*- Saleyards Perspective*

*- the concept of exemptions was raised at the forum at Naracoorte but landed on harmonisation and full traceability across the board.*

There are many animals that go direct to slaughter, there is such a huge number of animals that will lose the full biosecurity and traceability.

Simply not true. Fully traceable, mob based with accompanying NVD. See Sheepcatcher II.

Once the animals board the truck they are held captive until they reach the abattoir. No animals can enter or exit the truck. At the abattoir, when backed up to the ramp, once the truck door is opened, the onus is on the abattoir to ensure isolation from other consignments.

Show me the weakness?

This argument, as so many others do, conveniently ignores the fact that by mandating eID tags, more animals will now exist on farms without tags. Not limited to lambs, but including ewes, wethers and rams.

These claims are highly hypocritical.

*- Straying stock is a big problem and if you don't have ear tags in them then you don't have tags in them.*

Is it? What issue has been caused by straying stock that would have been prevented with the addition of an ear tag?

Anyone who has experience working with sheep can verify that visually draughting mixed mobs, or determining a stray animals origin, is achievable, with surprising accuracy, due to the fact that sheep do not all look the same. Especially between different pic's, there is such a minute chance that the components of a mixed mob are all the exact same age, of the same breed, with an indistinguishable length of wool, of which is tainted with the same color dust.

I can assure you that stock don't stray very far. In the event of a biosecurity issue, it won't be just the implicated property that is monitored, all adjacent properties will be included, obviously any stock that are found straying will join the 'mob' under suspicion. Mob based again, because it works.

Refer to my Where's Woolly explanation.

From Animal Health Australia

Emergency animal disease responses:

“When an outbreak of an EAD is confirmed, the state or territory authority will quarantine the infected property immediately. They may also quarantine other properties, such as those close to the infected property or because of recent animal, people or vehicle movement.”

Mandating eID's will exacerbate the number of untagged animals in the field.

If you truly believe that sheep without ear tags is going to be detrimental, this mandate only amplifies the situation.

*- Reinforce there is a great desire to have a national system.*

So I keep being told. Apparently this relinquishes us of our obligation to seek the most appropriate system?



Can you send me a copy of the National system?

We are tasked with:

- enhance South Australia's sheep supply chains' understanding and acceptance of an eID system for sheep
- help industry and government make informed decisions about the design, timing, policies and programs needed to realise an effective eID system for the South Australia's sheep industry.

I will continue to seek factual evidence to support my claims.

*- There is really no interest in tag exemptions from sheep.*

From those who do not produce prime lambs?

Might it be due to the fact that they're not being saddled with the greatest cost for the least gain?

I can assure you that I have experienced plenty of interest.

How much interest do we require to investigate the merits?

*Next Steps*

*- Will keep considering this option for a system where vendor bred animals direct to slaughter do not need tags.*

*- If this committee were going to try to pursue a tag exemption, then we need to understand who and how many producers agree with this path.*

Absolutely not, this is not a vote. The number of producers agreeable has absolutely no bearing on us imposing a cost that is proven to have no benefit. If this mandate only affected 1 producer, isn't it clear that for no tangible benefit this is not only unjust but foolish.

I can inform the committee that many commercial producers not only invite a tag exemption per my proposal, in fact they are livid at the thought that there is any move to deny it.

Summary:

Has anyone else read on about the proposition in Oxfordshire?

“The county of Oxfordshire, England, which includes the city of Oxford, is imposing a “climate lockdown” that will confine residents to their neighborhoods.”

I would expect that each of you would be equally aghast as I, when presented with this. Would you be comfortable to impose such a mandate on others, for the ‘greater good’, so long as it doesn’t affect you?

Believe it or not, it is not a big step from what we are trying to do here. This is not the type of regime I wish to live under.

I see these ideologies creeping in to our everyday life. Case in point, from the ‘Background’ provided to the Members of this committee, in the terms of reference:

“The sheep industry no longer questions if, but when sheep eID will become mandatory.”

There is no factual evidence to support such a claim. This is merely propaganda. As such leads me to believe that many of these decisions have been preordained.

Glen awarded me a compliment about my dedication and persistence regarding this issue, for which I humbly thank him.

But my stance is greater than just this mandate, it is a stance against excessive regulation.

I am a firm believer in the adage:

“The standard you walk past is the standard you accept.”

I try my very best to apply this to every aspect of my life. That is why I will not let this issue go unchecked.

My intent here is not to demand that you adopt my position, rather to provoke rational thought.

My call was for cogent reasoning to deny the exemption proposed. To my mind, still none have been provided.

## Appendix E

Again I have formatted the document text in italics and my responses in normal text.

Are you aware:

“All sheep owners in South Australia contribute \$0.67 per head to the Sheep Industry Fund when 5 or more sheep are sold for \$5 per head or more.” (From the Livestock SA web site)

This is a transacted levy, that is it is calculated on a per head basis. Remember, lamb producers are the greatest contributor to this levy.

This levy is voluntary, although automatically transacted, it must be refunded upon request. I can assure you that if this committee continues to ignore the voice of the sheep producers, they will cease to fund Livestock SA.

### *KEY POINTS*

*1. The steering committee has been presented a number of details regarding the option for exemption pathways for sheep through the supply chain.*

*2. There are segments of the sheep industry that propose identification exemptions for specific groups of sheep. These include consideration for a tag free movement for vendor bred direct to slaughter which the committee needs to explore.*

*3. At the recent Ag Ministers Meeting (7 December 2022) the Ministers reiterated their “intention to implement harmonised tagging requirements for all managed farmed sheep and goats using individual electronic identification, working towards 1 January 2025 implementation. Key milestones being worked towards include tagging all (ALL) managed farmed sheep and goats born on or after 1 January 2025, tagging all managed farmed sheep and goats leaving their property of birth or last property of residence, and having sufficient infrastructure in place to allow the scanning of tagged animals as they move through the supply chain. Implementation in jurisdictions will be guided by the needs of industry and producers.”*

It is blindingly obvious that for any eID system to work, reconciliation of tags will be necessary. I have been speaking to many producers regarding this mandate, one alone farms 45-50,000 sheep, and has 10% deaths annually. What are these worthless tag entries going to do to the database over time?

When are you going to admit this and tell the producers the truth?

Every commercial sheep (and goat) farmer will require, at the very least, one hand wand, one panel reader and the accompanying hardware and software to utilise these, plus retrofitting. The system cannot work without this, hence this must be added to the costings.

*4. Sheep and Goat Steering Committee representing the various sectors of industry need to weigh up the pros and cons for sheep exemptions in South Australia to decide if these are pursued.*

*5. If we further pursue exemptions it will need to be properly planned and costed, as our investigations have found it will require additional consultation and modelling beyond what was proposed. Also, if we agree to a nationally harmonised system, then we will need a plan to influence other states for this exemption.*

If we chose not to pursue exemptions, this absolutely needs to be costed. How can you insist on costing one way and not the other ??

## *BACKGROUND*

*6. Livestock SA was engaged by PIRSA to focus on:*

- Not if, but when and how eID could be implemented in South Australia*
- Strategic approach the decision on when and how a sheep and goat eID system might be implemented in South Australia.*

*7. Key objectives of the Sheep and Goat Steering Committee as per terms of reference:  
The Sheep and Goat Traceability project will:*

- enhance South Australia's sheep and goat supply chains' understanding and acceptance of an eID system for sheep and goat*
- assist industry and government make informed decisions about the design, timing, policies and programs needed to realise an effective eID system for the South Australia's sheep and goat industry.*

*8. Current SA legislation and regulations*

- Interpretation of the current Livestock Act 1997 and Livestock Regulations 2012, states that all animals must have a PID (Permanent Identification Device) when moved from a property. This also states that animals at abattoirs must have PID and movement documentation, and if not, the owner and person responsible for the management of the animal immediately before its movement to the abattoir are guilty of an offence.*

This in no way constitutes a reason to deny the exemption.

Legislations are altered every day, to adjust to evolving circumstances. That is why we have a parliament.

*9. Exempting sheep and goats moving to abattoirs on an over the hooks (OTHs) basis from their properties of birth was an option considered in the 2014 National Livestock Identification System (NLIS) (S&G) Decision Regulatory Impact Statement (DRIS).*

*There was widespread opposition to this option expressed by most jurisdictions, processors, saleyards, and agents in their responses to the DRIS.*

Of course there was - they're not having to pay for the tags, nor put them in 60kg animals as they leave the property - for no gain.

*The consensus at the time was that whilst there are theoretical arguments why such an exemption would not compromise traceability, communicating when the exemption applies, and associated monitoring and enforcement, would be very difficult and expensive to achieve.*

As difficult as applying millions of ear tags to 60kg lambs as they leave their property of birth?

As expensive as upto \$28k per processing plant, per day, of useless tags?  
(A works killing 10K lambs/day is about 14 B-doubles, hence can equate to \$28K of tag value, per processing plant, every day, forever)

*10. Other jurisdictions have not fully investigated this option through a cost analysis, however, have used their professional and technical advisors to rule exemptions for sheep out.*

Define "professional and technical advisors"? My experience makes me wonder who issues these titles.

This whole exercise has been promoted as being 'Industry led' - without the sheep producers there is no industry.

*Summary of arguments as to why this has not been explored in other jurisdictions include:*

*Veterinarians have concluded that biosecurity and traceability risks are created every time an animal is moved from the place it is pastured. Although, while it might be a lesser risk when going direct from farm to slaughter it is not a 'no risk' scenario and the risk needs to be managed.*

Nothing is 'no risk'.

Is the risk here worth \$2000 for every B-double load of lambs ?

For example, a works killing 10K lambs/day is about 14 B-doubles, hence this can equate to \$28K per processing plant, every day, forever - for no gain.

This requires cost-benefit analysis. A decision cannot be made until this is available.

*Confusion can occur where exemptions are in place. It is far easier to communicate basic requirements to producers without having to explain when exemptions apply.*

What a pathetic excuse, and an insult. Far easier for who?, not the producer who has to spend an extra \$2K per load and apply the tags to upto 700, to 60kg lambs - for no gain. Which will be thrown in the bin the day after.

More single use plastic waste.

*Cannot assume that every animal going direct to slaughter will not co-mingle with other animals at a depot or in lairage.*

How is this the responsibility of the producer? Why do they have to spend an extra \$2K per load and apply the tags to upto 700, 60kg lambs, as they leave their place of birth? Which will be thrown in the bin the day after.

This is the responsibility of the abattoirs. As such they should not seek to impose costs onto others to mask their inadequacies.

*Evidence has shown that up to 30% of animals consigned direct to Frew's Abattoir in Victoria are diverted to farm or depot.*

The exception is for lambs going directly to slaughter - this can not be made any clearer.

*Some animals die in transit or are euthanised and removed from pens prior to processing. Once dead animals are removed from incoming mobs, they can't easily be linked back to their properties of origin. These dead animals need to be traceable because of the risk that some may have infectious diseases.*

Can't the processing plant apply an identification tag to the relatively very few animals in this case?

You're suggesting that it's more feasible to make the producers spend an extra \$2K per load and apply the tags to upto 700, 60kg lambs. Which will be thrown in the bin the day after.

This is insane?

*While all due care can be taken, it is well recognised that livestock consigned direct to abattoirs from time to time become mixed prior to being processed. Sheep jump pens or get mixed up in lairage. Sheep are known to jump ahead of each other on the lead-up ramp to the restrainer.*

Are you suggesting that it's more feasible to make the producers spend an extra \$2K per load and apply the tags to upto 700, 60kg lambs? Which will be thrown in the bin the day after.

This is the responsibility of the abattoirs. As such they should not seek to impose costs onto others to mask their inadequacies.

Why are Livestock SA advocating for everyone except the producer?

*eID system will avoid unsuitable product going to an inappropriate market and ensures the correct person gets paid for the quality, weight and number they deliver to abattoir.*

The signed NVD does all of this. The meat safety standards section ensures all APVMA requirements are met.

The eID tag only gives a unique number, you can not write information onto the tag.

*Many abattoirs come to rely on electronic NLIS (Sheep) tags for inventory management purposes. Abattoirs will come to use eID to manage their kill agendas and carcass feedback.*

How is this the responsibility of the producer? Why do they have to spend an extra \$2K per load and apply the tags to upto 700, 60kg lambs?

The producers gain absolutely nothing from this cost.

*Abattoirs are also required to identify the last property of residence before livestock are processed. Having an electronic tag in an animal's ear proves this accurately. Without this, abattoirs would need to design and implement other arrangements to be able to satisfy this requirement.*

The animals per the exemption have never moved. The NVD has the pic of birth.

Do you not understand how the system works ????

The signed NVD links every animal to all of the required information.

The abattoirs have been managing to satisfy these requirements for decades - it is an outright lie to suggest that they need to alter anything to comply.

*Abattoirs are known to manage livestock onsite for days or weeks before processing them, particularly animals purchased 'in the paddock' on a per head basis. There are also times when direct off farm to slaughter animals are transferred to a depot. In Victoria, these depots are scanning lambs in for their transfer.*

Go back and read the terms of the exemption.

“Place of birth to slaughter”

*Abattoirs are known to have shutdowns when the chain stops which may be associated with breakdowns or power interruptions. These animals then are returned to lairage until the problem is rectified, or moved back to farm or holding yards.*

How is this the responsibility of the producer? Why do they have to spend an extra \$2K per load and apply the tags to upto 700, 60kg lambs?

The producers gain absolutely nothing from this.

Why are Livestock SA advocating for everyone except the producer?



*Exemptions for livestock direct to slaughter will distort the market. A large volume of sheep that are traded through saleyards. Having an exemption for tags for stock direct to abattoir provides an incentive to go direct.*

So what ??

It's called free trade.

The producers didn't ask for eID tags, as far as I can tell that weren't even consulted. If the market is distorted it is due to a system you have poorly designed, and now insist that the producers fund it!

Why does the producer selling directly to the abattoir need to subsidise the Saleyards?

Why do they have to spend an extra \$2K per load and apply the tags to upto 700, 60kg lambs?

*If eID is a national system, SA producers will be limited in their market options to only state-based abattoirs if interstate processors do not accept non eID animals.*

Utter nonsense. There is clearly no market advantage for animals with eID devices. The Victorian mandate indisputably proves this.

If the market shifts and has a price variation for eID tags then producers will adapt to that market - of their own free will.

*An over the hook exemption will be strongly opposed by processors, saleyards, and agents. We need these important groups 'on side' and involved to assist clients and for communicating requirements to them.*

Of course it will - they're not having to pay for the tags!

An over the hooks exemption is strongly requested by producers, I keep saying it.

Why are Livestock SA advocating for everyone except the producer??

From Livestock SA's web page;

“Livestock SA is an industry association representing beef cattle, sheep and goat producers in South Australia.

Livestock SA is a not-for-profit member organisation that is the voice for livestock producers on all industry issues. Livestock SA works to inform government, businesses and the wider community on livestock producers' contribution to the food and fibre industries and to the wider South Australian economy."

"Livestock SA's primary focus is policy and advocacy which is made possible by industry assistance through producer levies on sheep and cattle. The levy money is collected through the SA Sheep and Cattle Industry Funds."

"Our Mission

To be a strong advocate for South Australian livestock producers."

"Our Values

- Vigorous representation for the South Australian livestock industry
- Providing a respected voice for industry and members
- Accountable and trustworthy
- Members have a focus on ethical and sustainable practice
- Passion for the livestock industry"

I am not witnessing any of the above. Quite the opposite in fact.

*Monitoring and enforcement will be much more challenging and resource intensive with over the hook exemptions. If permitted, the impact on jurisdictional compliance plans would need to be calculated and added to project budgets.*

"Challenging and resource intensive"??

Like - for every load, applying tags to upto 700, 60kg lambs, forever!

Like - \$2000 for every B-double load of lambs, forever?

(A works killing 10K lambs/day is about 14 B-doubles, hence this can equate to \$28K per processing plant, every day, of useless eID tags, that get thrown in the bin the day after.)

This is exactly why ACIL Allen have been contacted to determine the cost benefit analysis. I have requested this be done, more than once.

*Not applying an eID on farm exports the cost from an individual producer to the processor, this cost multiples exponentially when required to manage compliance, handle or separate different tag types and verify scanning rates.*

Why is Livestock SA advocating for the processors, and all too happy to push the cost onto the producers?

Where does their funding come from?  
Who do they represent?

*While sheep do lose tags, if their cohort has eID tags you can ascertain their origin with better certainty – as when that cohort is scanned a link is established with other scanned animals also present at that location.*

There is no need for any tags in the exemption.

Once the animals board the truck they are held captive until they reach the abattoir. No animals can enter or exit the truck. At the abattoir, when backed up to the ramp, once the truck door is opened, the onus is on the abattoir to ensure isolation from other consignments.

With the signed NVD and the NLIS system, every animal is 100% traceable and linked to all necessary requirements.

*Using eID, checking and verification occurs through the scanning process which links each tagged animal to a particular consignor, location, and date.*

Checking and verification is completely unnecessary for this exemption.

The signed NVD and NLIS system provide all necessary information, and link every animal in every way.

*Future technological advancements will see a more automated system, where processes will reduce some of the data entry elements in our traceability systems.*

How is this the responsibility of the producer? Why do they have to spend an extra \$2K per load and apply the tags to up to 700, 60kg lambs?

The producers gain absolutely nothing from this.

Why is Livestock SA advocating for the processors, and all too happy to push the cost onto the producers?

Where does their funding come from? Who do they represent?

*11. Optional benefits of EID- for producers who use eID there are many potential flock and cost management benefits of electronic identification (EID) for producers to use on the farm.*

For commercial lamb producers - absolutely not true. I have testimonials from many producers stating the exact opposite.

*This is optional, but there is a lot of data to indicate these benefits outweigh the costs.*

Where is this data? - if you make a claim that there is data, you must provide at least the source of the data.

*For prime lamb producers, individual hook tracking at abattoirs will provide individual animal feedback which can inform decision making, particularly when matched against other trait data collected from birth to slaughter.*

You clearly do not understand prime lamb production.

Individual animal feedback is of no use to commercial lamb producers. Everything is done as mob based. The numbers of animals are so high and the time between birth and slaughter so short, individual assessments are not feasible nor entertained, they are useless.

Just another example of people making decisions on something they know very little about, even worse, ignore experienced input.

## Appendix F

Hi JP,

I have some information for you that I believe requires consideration in the modeling for costing of implementing a mandate for eID tags in regards to sheep.

My position on the steering committee is to represent the sheep and lamb producers, as such I have some concerns that this exercise is attempting to rectify a number of shortcomings of the NLIS system, none more prevalent nor undermining than non compliance of NVD's. My personal belief is that if these issues were adequately identified and corrected there would be no further requirement necessary to comply with our industries traceability ergo biosecurity standards. I have attached a copy of the report I submitted to this committee outlining my reasoning for these beliefs.

Notwithstanding, one of my requests of the committee is to consider an exception from eID tags for animals moving from their place of birth directly to slaughter, on a transporter exclusive to that birth PIC.

A document supplied to us outlining Victoria's discussion on the same exemption, estimated that this could represent up to a third of the lambs produced in that state.

I have tried to gain some figures on the number of animals this may represent in South Australia, but to no avail.

My concern now with costing relates to the scenario where this exemption is disallowed, requiring all lambs in the state to be eID tagged.

As I explained in our meeting yesterday, this requirement will change the behavior of many, probably most, commercial lamb producers, thus the cost of the mandate. It is well known in the industry that a portion of sheep ear tags are inadvertently separated from the animal during its life time. Currently an allowance is made for this occurrence, I believe up to 10% non compliance is the acceptable figure when consigning Sheep to slaughter. I have never heard of anyone being informed that they had too many tags missing in a consignment, and I know for a fact that consequently some producers deliberately only tag 90-95% of their lambs.

It is my understanding that with the pending mandate of eID tags a sliding scale of compliance will ensue, as one of the documents provided to us indicated was the intention in Victoria.

From said document:

“The action level and performance levels were originally set at 80 per cent and will increase to 90 per cent on 31 March 2019. These levels will be increased incrementally until they reach 98 per cent.

Where the action level has not been reached in a saleyard, it is typically because incoming mobs have sheep that have not been electronically tagged. Where mobs do not reach the action level, some saleyards and agents are charging vendors approximately \$2.00 per head to attach post-breeder tags to sheep that have not been tagged or are missing tags. Where a large number of sheep in a mob are untagged, agents will generally return the mob to the vendor.”

Due to both the requirement for increased compliance and the far greater expense of the eID tags, producers have told me, in fact my own business will be forced to apply the tags directly prior to the lambs leaving the property rather than continuing our current practice of applying them at lamb marking. This alteration in timing has huge ramifications in the cost to producers. Not only will this produce an additional process for every lamb heading to slaughter, but the effort required is many many times greater. When an ear tag is applied to a lamb at marking, the lamb is only a few kilograms in weight and is restrained in a marking cradle. When a lamb is tagged directly prior to slaughter, the MLA data shows that the average carcass weight of SA lambs slaughtered is 26.7 kilograms, which equates to appropriately a 60 kilogram live animal, which I can tell you are a formidable opponent. Applying up to 700 ear tags to fill a truck load for slaughter is a very time consuming and physical job, bearing in mind that the average age of the Australian farmer is between 50 and 60 years old. I also believe that an additional cost to the producer will inadvertently occur due to the timing of this application through unnecessary bruising and injury to the animals at a most crucial point in their production.

There was some concern raised at our meeting that by allowing an exemption for these lambs would increase the biosecurity risk by allowing animals to exist without identification tags. I know for sure that a mandate on tagging these lambs destined for slaughter will only diminish the likelihood that they will carry any form of identification whilst in the field. In fact I have had commercial producers inform me that any sheep born on their property will not have a tag applied until that animal is yarded to leave said property, so for closed flocks this can equate to every sheep in the business, delivering the opposite effect on biosecurity to that intended.

Furthermore, it has been suggested to me through discussions with this committee that:

“PIC reconciliations are not legally required, but are recommended every now and again to ensure the on farm situation matches (as best it can) with the devices on your database account.

It might be practical to do this at shearing, for example, when all sheep on property will be in the yards and can all be scanned. Currently cattle EU rules require regular pics reconciliations.”

Here is another task required by the producer, although not mandatory yet, not a long bow to draw to predict that it will eventuate. It is simple for someone say “it might be practical to do this at shearing, when all the sheep will be in the yards” those same people have also stated that “most producers will not require any reading device, some only a hand wand reader”. I know of producers that shearing can take up to 2 months, at what cost will the reading of their tags come? With a hand wand?

The cost of the tag itself is not as simple as it seems either. The tags, when utilized for management purposes, are depreciated over the life of the animal. Hence the cost of tagging a lamb destined for slaughter is greater than the same tag applied to a breeding Ewe, Wether or Ram. This difference has to be accounted for when analyzing the actual cost, particularly in the scenario of whether or not to allow an exemption for lambs going directly to slaughter. This comparison of exemption or not, calls for further adjustments, for example the predicted cost of applicators required also increases due to the quantity of lambs requiring tags with and without an exemption - I know first hand that the applicators don't last long and require constant replacement. From my own experience the Alflex tagging guns typically fail between about 3-5,000 cycles, a minimum of 1 extra tagger is required as a back up (we wear out at least 1 every year and always have 2 spares), and retail for nearly \$200.

JP, your draft analysis clearly indicates that the cost of the tag is the greatest cost to come from this mandate. With an exemption the quantity of tags required annually is greatly reduced due to the majority of the recipients (lambs) having the shortest life span.

For commercial sheep farmers, labor is one of the largest cost components of production. Every time an animal has to be muster and handled it comes at a significant cost. Each additional requirement stemming from what is seemingly simply replacing a visual tag with an electronic tag, will create much larger costs to the producers than meets the eye. Anecdotal evidence and experience suggests that every time commercial animals are handled, that is taken from their daily environment and processed for any reason, their growth rate is compromised. I have witnessed this first hand and had it verified by managers of several feedlots.

Within your modeling, can I request a comparison of the cost of mandatory eID implementation both with and without the exemption of animals moving from their place of birth directly to slaughter, on a transporter exclusive to that birth PIC, including consideration to the associated costs outlined here.

Regards,  
Duan Williams

Dear Duan

Thanks for the feedback and I am looking forward to receiving more from other Committee members.

As discussed at last week's committee meeting the final report will include discussion on the net benefit (i.e. benefits – costs) of tracing sheep and goats using eID.

Once all the feedback is in, and any insights from the AMM meeting, I will sit down and look at how to integrate all the points raised.

Cheers  
JP



## Appendix G

Email from the committee regarding the survey results:

Re. Vendor bred direct to slaughter.

A comment about how many people want this was raised in the meeting.

I went back to the survey, and in the 670 responses a request for non-vendor bred direct to slaughter was raised by 6 people when asked what would make sheep and goat eID successful for your business and the industry. It was raised a further 4 times in the any other feedback section (by separate people to those that raised it in the previous question). This represents 1% of the respondents.

If I had to tally it I think we had more respond with that they want it to be nationally harmonised, simple or that they think that the same rules should apply to everyone.

And as an FYI the biggest group seeking an exemption was from pet owners and smaller landholders.

Thanks,  
Pene

My reply:

Thank you Pene,

Let me preface this response by stating that as a fifth generation sheep farmer, specializing in prime lamb production, no one is more invested in Australias sheep industry than myself and my family. My great grandfather established a Dorset horn stud, registered as flock number 17 in 1923. As such, biosecurity is of paramount importance to our business, hence any moves proven to enhance this, will be fully supported by myself and my family.

Now, I have a few comments to make regarding your analysis of the survey.

Firstly, the survey did not ask the question;

“Would you support an exception for lambs going straight to slaughter from their place of birth, in loads exclusive to their pic of origin - yes or no”

Hence only those who were inclined to address it in general feedback had considered it as an option.

How many participants did not respond at all to the 'any other feedback' ?

If we are going to make comments regarding industries response to a particular point, we need to be upfront enough to ask them the question.

And this should have been a minimum requirement, let alone providing the truths about the documented findings of mob based versus individual based trials.

Secondly, you're failing to understand, the cost saving in both monetary value and effort of the exemption is not determined by the number of people it affects, rather the number of animals it affects.

I recall a figure being mentioned at one of our meetings stating that the majority of lambs being slaughtered come from a small number of PIC's. I'm sure this data can be found with a little effort.

Thirdly, it is plainly unjust to mandate a cost on anything unless it can be proven that the cost is out weighed by an associated benefit. I have requested proof of this benefit numerous times now, none has been forthcoming thus it appears none is available.

Fourthly, I'm sure you can forgive me for questioning the validity of the survey results when it also produced the following data:

From Qu3. The average producer

- sells 5066 sheep/year
- buys 3753 sheep/year
- moves 257 consignments/year

I think there are about 5000 registered PIC's in SA, obviously some people have multiple PIC's but not many.

Remembering that there are approximately 10million sheep in SA, if you take figures from this survey, my math tells me that in South Australia we can claim that there are in the order of:

- 25million sheep sold/year
- 18million sheep bought/year
- 1.2million consigned movements/year

From Table 3. Goat Movements

The average goat farmer:

- buys 1313 goats/year
- sells 115 goats/year

I have no idea how many registered goat farmers there are in SA, but here my math tells me that their flocks are rapidly growing, and I soon expect to see a lot of goats in paddocks!

Referring back to my tertiary studies in statistics, due to table 4 showing that the number of sheep and goats tagged annually had an upper limit of 80,000 (although this surprised me I can believe it) consequently the mathematical averages indicated are not even closely representative of the reality.

This reaffirms my second point, if you graphed the number of animals sold against the number of producers they come from it would show an inverse squared function. The largest number of lambs are sold by the least number of producers.

Are we as a Committee happy to saddle even that 1 producer from the survey, even if they only sold half of their 80,000 tagged animals, with potentially a \$100,000 ear tag bill, (let alone the many others as the scale descends), that especially if destined for slaughter from their place of birth, gain no proven benefit?

I can tell you that I am not.

The attitude displayed in your comments confirms my concerns regarding the manner in which this entire topic of exemptions is being approached. It appears that the envy towards some producers that may legitimately have an avenue to move stock free from this mandate outweighs rational thought and due diligence.

Once again I find myself calling for concise rationale for not only an exemption, but the entire implementation of mandated eID's in the sheep and goat industries. What are the benefits ?

I am now in a position where I believe I am obligated to make these discussions public knowledge. I requested inclusion onto this committee believing that this process was genuinely seeking guidance from industry. It is becoming more and more apparent that the voice of industry is of a secondary consideration.

Genuine consultation requires fully imparting the knowledge that we collectively have and genuinely seeking a response, from industry, to that knowledge.

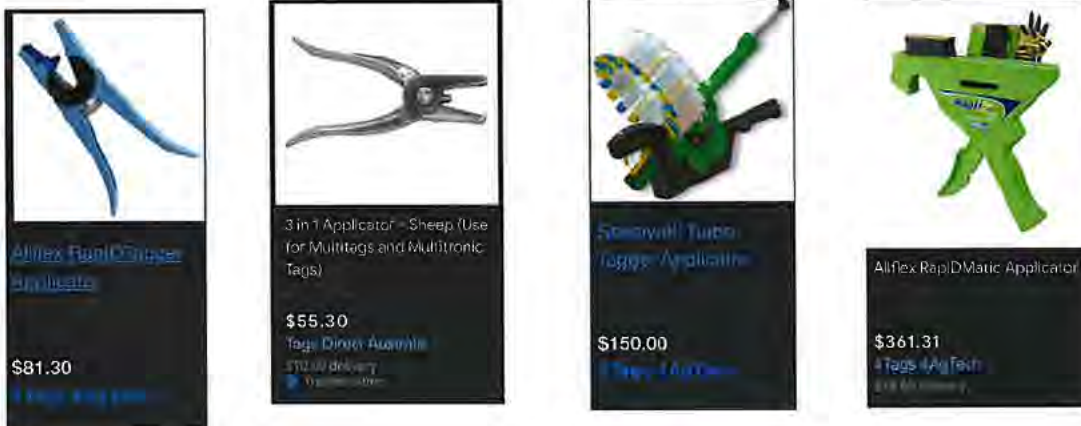
Just as an example, although only briefly mentioned so far, it is blindingly obvious that for this system to work, reconciliation of tags will become a requirement. If we had any inkling that reconciliation of eID's may become any part of the scheme in the future (which I do), we should be honest enough to inform the industry of this belief at this point. How can we possibly present a considered position of the costs to the industry without incorporating this, unless we can guarantee that it won't be implemented in the future. Failure to do so is akin to fraud, since to comply with probable (necessary) reconciliation, every commercial sheep producer will require at least a pannel reader.

A proposition which is going to cost this industry hundreds of millions of dollars must be well founded and should not be held up on the basis of half truths.

# Appendix H

The committees Business Case allows provisions for 50% of producers to have 1 applicators and has assigned \$65 for the cost.

Here are some examples of eID tag applicators:



Now if you had to tag more than a few hundred upto tens of thousands of sheep each year which type of applicator do you think you would choose? The two on the left only hold 1 tag at a time, a new one has to be reloaded for each animal. The two on the right hold 25 tags at a time.

Personally I've been using Allflex tags, and would not consider tagging without the RapiDMatic Applicator. I can tell you that they do break down and wear out, so a back up until is essential. I have at least 8 of these in my shed right now, 2 are operational.

# Appendix I

## Final Business Plan

Email from myself to the committee:

Hi all,

I completely agree with Anne's frustrations regarding the Business Plan.

We spent nearly the entire last meeting going through these documents in detail, and as Mark pointed out, a lot of this time was correcting basic spelling, grammatical and mathematical errors. More importantly, as a group we highlighted many figures from a number of different sectors that we deemed simply inaccurate and unacceptable.

Did anyone else receive contact from ACIL Allen asking for clarification on the details we deemed inaccurate? I sure didn't.

Isn't this the very definition of 'consultation'?

At the last meeting I submitted a list of recommendations and requirements, as a representative of my sector, as did many of you. Not only was I not consulted, to have the discussion as to why I believe some of the figures and statements were inaccurate and what I believed they should be altered to, but the documents have been reproduced without changing any of these things.

As an example, to suggest that only 50% of producers will require a tagging gun, and on average these will require 1 each, tag applicator valued at \$62, is absurd.

The lamb producers in my region use multi shot tagging guns. As I have pointed out many times these retail for around \$300 each, and we require more than 1 of them.

A rough example of the implication of this seemingly minor point:

If we could accept that half of the producers could get by with a cheap single shot tagger, a quarter may only require 1 multi shot gun, and a quarter require 2 multi shot guns (@ \$300ea) - of the 8,500 active PIC's this alteration adds approximately \$1.5M to the cost to the producers.

If we're going to submit a report indicating the 'true' cost of this implementation, I believe it must be accurate and factual.

To state that:

Benefits:

“Improved biosecurity, market access and productivity are the major benefits”

“Finally eID provides businesses the opportunity to achieve productivity gains by being able to monitor and manage the performance of livestock individually.”

whilst only allowing costing of any form of tag reader to 5% of producers is absurd. This is implying that a significant benefit is achievable at no cost to 95% of producers. This is plainly bogus.

Tara has made it abundantly clear to us that the responsibility of reading and recording incoming stock movements is the responsibility of the purchasers, by law. I accept that in some cases this transaction will be undertaken by agents on the producers behalf, however if eID's are mandated, we have a law that states that all sheep and goats must be eID tagged, and a law that states the producer is responsible for transference of all purchases, how can it be acceptable that only 5% of producers will require reading equipment? (the equipment alone is not the only cost either, installation and hardware/software must be accompanied)

Not only does this business plan cut the producers well short of essential equipment, but as Liz clearly pointed out, the amount of equipment allocated to the agents was well short of acceptable, and I don't believe the addition of 1 extra hand wand to the 90 firms is still adequate. As Liz stated, these firms represent many hundreds of agents, which I thought our previous discussion had suggest that most of these would require reading equipment?

It is doubtful that I am going to be able to call in and participate in tomorrows meeting, but as it stands, I can not accept or endorse the Business Case or it's costings, and I am seriously disappointed in the manner in which it has been produced.

Can I please request that this be tabled in the minutes.

# Appendix J



23L0160

9 February 2023

The Hon Clare Scriven MLC  
Minister for Primary Industries and Regional Development  
Level 10, 1 King William Street  
Adelaide SA 5000  
Via email: [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au)

Dear Minister

**Re: Government position on exemptions for mandatory eID in sheep and goats**

I write to seek clarification on the South Australian Government's position on exemptions for specific classes of livestock following the decision by Commonwealth, state, and territory agriculture ministers for the mandatory implementation of national individual electronic identification (eID) for sheep and goats in each jurisdiction by 1 January 2025.

As you are aware, Livestock SA is delivering a project with funding from the government (through the Department of Primary Industries and Regions) and the Sheep Industry Fund to:

1. Form a South Australian Sheep and Goat Traceability Steering Committee that can provide advice from across the supply chain (i.e. whole of industry); and
2. For that Steering Committee to:
  - o develop a South Australian specific Business Case outlining the costs, risks and issues that will need to be overcome to effectively implement a mandatory eID system
  - o develop an implementation strategy and a communication, extension, and engagement strategy for the effective implementation of eID in South Australia.

A material and pivotal change that occurred soon after the project commenced was the decision by Commonwealth, state, and territory governments to mandate a nationally consistent eID system for sheep and goats. This decision necessitated an adjustment to the original scope of work and deliverables of the project, as it was originally designed to assess the justifications (or not) for implementing sheep eID in South Australia to inform government decision making on this issue.

Nevertheless, the Steering Committee has progressed a positive body of work to ensure that a mandated eID system in South Australia is properly costed and inform implementation decisions to reduce disruption and maintain efficiencies for livestock producers and the supply chain.

Through the project and separate consultation meetings and processes we have undertaken with our members, Livestock SA is aware that some sheep producers are requesting exemptions from mandatory eID for specific classes of animals and production systems. We are also aware that this issue has been discussed and debated through the Steering Committee.

---

**From our discussions with you and your department on this matter, and from Agriculture Ministers' Meeting communiques, it is our understanding that all governments are committed to harmonised eID tagging requirements for all managed farmed sheep and goats and that the South Australian Government is not considering state-specific exemptions.**

**While we have been advising our members this is the State Government's position, we are also aware that neither you nor your department have made any public statements on this matter. As such, we formally seek the South Australian Government's position to help guide our efforts in representing the interests of our members.**

**Yours sincerely**



**Joe Keynes  
President**

**cc. Mehdi Doroudi, Chief Executive - Department of Primary Industries and Regions  
Peter Treloar, Independent Chair, South Australian Sheep and Goat Traceability Steering  
Committee**



## Appendix K

This was included in an email I provided the committee explaining the effects on traceability in the case of a Truck rollover.

You raise the point that a truck rollover is a real possibility and must be considered, even though very rare.

Ok, If you want to focus on the possibility of very rare occurrences weakening the system, take this into account.

The Victorian requirements for ear tag compliance was introduced as a diminishing scale, to a 98% end point. Mark has verified that this target has often been obtained in the abattoirs he has associated with.

98% - not 100%

With this in mind, let me present a hypothetical situation for consideration.

Imagine a situation where every sheep in the country was ear tagged the moment it was born. Not at marking, not when leaving its place of birth, the instant it was born. Every animal is deemed traceable.

Now imagine a B-double full of prime lambs heading from their place of birth, and exclusive to this load, for an abattoir. The truck tips over while passing through a rural region. It would be fair to assume it either comes to rest within the confines of the road, (outside of any paddock), or worse, has run through a fence in the process and is now either partially or completely in a paddock. If a fence has been breached, any number of lambs that have spilled from the truck could now be in the paddock.

Imagine this paddock contains 300 sheep, these animals are soon integrated. For the sake of this argument let's say that they are also lambs, of the exact same age, of the same breed, with an indistinguishable length of wool, of which is tainted with the same color dust. To make it clear, we are now assuming that there is absolutely no way of visually distinguishing the lambs from the truck and the lambs from the paddock. Now reliance on their ear tags is the only way to trace where they belong.

The data provided by all of the research into the successes of Victorias eID system, and Mark himself, suggests that from the 1000 animals now in question, mathematically at least 8 of them either do not have a tag or the tag is unreadable.

Now assume that at this moment, a disease outbreak has occurred. One of the pic numbers from the toppled truck incident is deemed to have been in contact with this disease, hence the pic is compromised.

If the disease was linked to the lambs on the truck, their pic and the pic of the paddock is now compromised.

If the disease was linked to the lambs in the paddock, this pic and all lambs from the truck are now compromised (as a mob) but not their pic of origin.

It only takes 1 of these lambs without a readable tag to become mixed with the other mob, the result is still the same.

Now run the same scenario now, where one or even both mobs of lambs do not have any ear tags, but every other minor possibility all converged at the same time.

The outcome is exactly the same.

If you are going to insist that every possible biosecurity scenario needs to be prevented no matter the cost, the only way forward is to outlaw sheep farming. Shut down the industry.

Petra made a very valid point in our November meeting. She said that "Biosecurity and traceability is about managing risk" She is entirely right, manage risk, not eliminate risk. Managing risk is about walking the line between progress and failure. If the economics of mitigating the risks outweigh the associated benefits, then it is no longer risk management, rather risk aversion. The result of this is a cost rather than a benefit.

No system is perfect. The pursuit of a perfect system is frivolous. My entire argument for providing exemptions for vendor bred lambs to slaughter is based on the fact that there is no compelling benefit for not allowing it. Obviously any cost assigned to produce zero risk is foolish.

## Appendix L

Note: this is an open letter, that will be circulated.

Dear Joe and Travis,

I assume that you are aware by now that upon completion of my role on the Steering Committee I have decided to take the opportunity to submit a Minority Report outlining my opposition to many of the falsehoods pertaining to both the rationale for the alleged necessity of this eID mandate and the resulting unfounded advice of the Steering Committee, particularly in regards to exemptions. As such, this report will remain attached to the submissions of the Steering Committee.

At every stage during my involvement I have sourced and provided facts and data to question and easily disprove the opinions and propaganda so eagerly accepted and adopted by those on the Steering Committee. In fact the Steering Committee have such little faith in their final product that a motion moved by myself to recommend that the conclusions of the committee, purportedly produced on behalf of the industry, be made available to the industry, failed, in fact did not even get a seconder, as I had anticipated.

My report will outline each of these points, in detail, referencing the applicable data and resources, as well as enlightening the recipients to the extreme bias in the composition of the Steering Committee itself. It will be made abundantly clear that to claim that this process was “industry led” is an outright lie, due to the largest of the stakeholders, the only stakeholders that will incur ongoing costs, haveing been grossly under-represented, unconsulted and disregarded.

Regarding the refunding of the the SIF levies, I am actively encouraging sheep producers (lamb producers specifically) to reclaim their voluntary SIF levy as a consequence of LSSA failing to represent their interests, in fact doing the exact opposite, (as evident in a correspondence from LSSA to Minister Scriven, dated Feb 9, stating “we formally seek the South Australian Government's position (on exemptions) to help guide our efforts in representing the interests of our members”) - and I will continue to do so.

I have been questioned often whether the 12c for the dog fence maintenance should be included when applying for the refund.

I have personally reached out to a number of the largest sheep producers in the North and made them aware of the situation, and was assured that they would spread the word through

their networks. Thus far they are seemingly disinterested, and not forthcoming with any assistance or support. This is understandable since the impact on them due to this mandate will be far less than those of us producing terminal lambs. Thus my advice is to also reclaim the additional 12c that we have been contributing, in good faith, for the benefit of our Northern counterparts and the industry as a whole, since in our time of need they are seemingly unwilling to reciprocate the sentiment.

Let me remind you that the job of your board members is to take the thoughts and the feelings of the people you represent, to the board to enact on behalf of those people - not to take the wishes of the board to those people.

Likewise, it is your responsibility to inform the Minister of the requirements of the livestock owners, not to seek the Ministers position to 'guide your efforts'.

It is your job to fight for our interests.

It appears that you are failing to realize that the Minister has outsourced this decision to you - because it is contentious. If it were not, the Minister would gladly make the decision and receive any applicable accolades.

I find it astounding that you are seeking a decision from the Minister, when the Minister has clearly tasked your organization with this duty, and that you have failed to grasp this simple reality.

Regards,  
Duan Williams

## Appendix M

Dear Minister,

I am contacting you to extend to you some forewarning regarding the pending mandate of eID tags in sheep and goats.

I understand that you are meeting with the President and the CEO of Livestock SA early next week, hence would like to provide you with some recent developments.

You may recall that I met with you in Mt Gambier in early February to inform you of my concerns regarding the mandate, in particular regarding terminal animals that move from their place of birth directly to an abattoir. My direct involvement has been as a member of the Sheep and Goat Traceability Steering Committee, which concluded its tasks only a few days ago.

I have been appalled at the manner in which this committee was constructed and the utter disregard it has shown to the sheep producers of our State. So much so, that I have enacted my entitlement to submit a Minority Report, which will be permanently attached to the findings of this committee. I will ensure that you receive this report upon its completion. I have also included below a correspondence from myself to Livestock SA outlining my decision to undertake this process and its rationale.

I am encouraging and succeeding in having sheep producers (specifically prime lamb producers) write to Livestock SA to voice their opposition to the apparent position taken by Livestock SA, particularly pertaining to denying any exemptions for eID tags, and to announce that they will be considering reclaiming their voluntary transaction levies, which proved revenue our States Sheep Industry Fund (SIF), hence Livestock SA.

Be advised, there are rumors that NSW are reconsidering their position on exemptions for eID tags on vendor bred animals due to similar events unfolding in their State. In fact I have been told that in yesterdays Livestock SA's Board meeting, upon hearing this news, the President openly commented in frustration that if Livestock SA were aware of this earlier, they would have also supported such a proposition.

I am also aware that WA and QLD have sheep producer groups strongly advocating for the same outcome in their respective States.

I sense an opportunity for us to announce the same preparedness to consider and advocate for very simple and risk free, specific case exemptions, saving sheep producers tens of millions of dollars each year, and perhaps even become the leaders in this sensible approach.

Sincerely,  
Duan Williams.

**Gonos, Anthea (PIRSA)**

---

**From:** PIRSA:Minister Scriven  
**Sent:** Thursday, 27 July 2023 12:20 PM  
**To:** duan.w@bigpond.com  
**Subject:** eA199476 - Minister Scriven correspondence  
**Attachments:** eA199476 - Minister Scriven correspondence.pdf

**Importance:** High

Good afternoon Mr Williams

Please find attached correspondence from Minister Scriven regarding the Minority Report provided.

Kind regards

**Office of the Hon Clare Scriven MLC**

**Minister for Primary Industries and Regional Development  
Minister for Forest Industries**

Government of South Australia | 1 King William Street, Adelaide  
GPO Box 1671 Adelaide SA 5001

**T:** +61 8226 2931 | **E:** [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au)

[pir.sa.gov.au](http://pir.sa.gov.au)



*The Department of Primary Industries and Regions respects Aboriginal people as the state's first people and nations. We recognise Aboriginal people as traditional owners and occupants of South Australian land and waters. We pay our respects to Aboriginal cultures and to Elders past, present and emerging.*

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Mr Duan Williams

Clause 6(1)

[duan.w@bigpond.com](mailto:duan.w@bigpond.com)

Dear Mr ~~Williams~~, *Duan*,

Thank you for your email of 1 June 2023 providing me with a copy of your Minority Report, to be considered alongside the Livestock SA Sheep and Goat Traceability Steering Committee's final Transition Plan and Communication Plan.

I appreciate the significant effort you have made to present your views on the outcomes from the Committee, noting that you are not in agreement with some of the recommendations including tagging exemptions.

As outlined in previous communications with you on this matter, I am advised electronic identification (eID) tagging exemptions for sheep consigned directly from property of birth to abattoir for slaughter was not supported by the Committee. My understanding is that the national sheep and goat producer bodies are also in favour of individual identification and full supply chain traceability, as is the Australian Meat Industry Council.

Australia's traceability system underpins our livestock product integrity and assists to manage risks to biosecurity, disease control, food safety and market access. The faster and more accurately animals are traced, the faster we can respond to and recover from a disease outbreak such as foot and mouth disease.

Although the movement of sheep from property of birth direct to slaughter is considered a lower traceability risk compared to other more complex movements, it is not risk free. eID tags further enhance the traceability of those animals and support the integrity of the system.

I recently announced that the Government of South Australia will deliver additional investment as part of the 2023-24 State Budget to implement the first stage of eID for sheep and farmed goats. This package will support supply chain sectors and livestock producers through a 50% per eID tag incentive in 2023-24 and 2024-25 for lambs and kids, and a 75% grant for essential infrastructure across the supply chain.

Sheep producers who consign lambs direct to slaughter will be eligible for this financial support.

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)



- 2 -

Once again, thank you for writing to me with your views on sheep and goat eID implementation in our state. I appreciate your ongoing commitment to the interests of sheep and lamb producers of South Australia.

Yours sincerely

A handwritten signature in black ink that reads "Clare Scriven". The signature is written in a cursive style with a long, sweeping underline.

Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

26/7 /2023



OFFICIAL: Sensitive



Government of South Australia  
Department of Primary Industries  
and Regions

Minute to  
**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**

Ref: eA199476



For **Noting and Signature**  
Critical Date Routine  
Subject **Minority Report, sheep and goat eID**

**Synopsis**

Mr Duan Williams has sent you a copy of his Minority Report, which also accompanied the Sheep and Goat Traceability Steering Committee's (SGTSC) recent Transition Plan and Engagement Strategy.

Mr Williams was a member of the Steering Committee and at times did not agree with the majority of members and some outcomes from the Committee. His Minority Report presents a number of personal views relating to implementation of sheep and goat eID in South Australia.

The concerns detailed in the report are broadly unsubstantiated and in contrary to state and national positions. They require no further investigation by government.

**Recommendations**

That you:

- 1. Sign the attached letter

.....  
Hon Clare Scriven MLC  
**Minister for Primary Industries  
and Regional Development**  
**Minister for Forest Industries**

25 / 7 / 2023

**Ministerial Comments -**

## Background

- In May this year, the Livestock SA Sheep and Goat Traceability Steering Committee (the Steering Committee) delivered their project in full, consisting of a Business Case, Transition Plan and Engagement Strategy. These reports will help inform government decision making on mandatory sheep and goat eID implementation in SA.
- This concluded the work of the Steering Committee and the industry led Sheep and Goat Traceability Project.
- Duan Williams was a member of the Steering Committee. He and his family have a property near Mount Burr and farm cattle and sheep for wool and prime lamb production.
- Throughout the Committee's work, Mr Williams voiced several opposing views to those that were agreed by the Committee, including that of tag exemptions. These are detailed in his Minority Report that has been provided to you.
- Mr Williams has written to you previously this year regarding this same issue, whereby you have addressed his concerns and offered thorough justifications for the government's position on tag exemptions (eA198719, eA199385).

## Discussion

- Australia's traceability system underpins our livestock product integrity and assists to manage risks to biosecurity, disease control, food safety and market access.
- The 2020 NLIS Traceability Evaluation Report found that sheep identified with electronic identification devices (EID) were traceable to 99.6% and sheep identified with visual tags were traceable to 70.1%.
- Agriculture Ministers have clearly indicated their expectation for a harmonised sheep and goat eID system across the nation for all farmed sheep and goats.
- Mr Williams is an opponent of mandatory eID tagging across the supply chain. He claims that an eID tag has no traceability benefits above those that can be achieved with a visual tag or the National Vendor Declaration (NVD).
- This claim was unanimously rejected as part of the Steering Committee's discussions on the topic, with the Steering Committee agreeing that the system should not include additional exemptions beyond those that already exist for rangeland goats.
- The exemption proposal was rejected on the basis that key traceability, market access and food safety expectations cannot be met with the current visual tag system, and strong support for the system to remain nationally harmonised.
- This position is consistent with other jurisdictions, the Commonwealth and national peak bodies to ensure national harmonisation and optimal traceability throughout the entire supply chain.
- Despite this, Mr Williams has made numerous claims that SA sheep producers are supportive of a tag exemption for sheep consigned from property of birth direct to slaughter. However, this claim has not been adequately quantified.
- Significantly, two major processors in SA, Thomas Foods International (TFI) and JBS, have informed Livestock SA that they do not intend to accept sheep without an eID device after 1 Jan 2027. This is consistent with the Australian Meat Industry Council (AMIC) position.

- The recently announced SA government funding to support the implementation of the first stage of electronic identification (eID) for farmed sheep and goats includes a 50% discount on eID tags. This measure will directly support sheep and goat producers, including those producers who send lambs direct to slaughter.

**Stakeholder / regional impacts, consultation and engagement**

- Nationally the livestock processing sector has indicated they will not accept sheep without an eID tag after 1 Jan 2027. If an exemption is provided for SA producers, TFI, JBS and interstate abattoirs are likely not to accept non-eID tagged sheep in future, restricting the markets available to producers.

**Management of key risks**

- State level exemptions would impact on the ability to implement a nationally harmonised sheep and goat traceability system.
- Exemption proposals such as this should be driven through national industry bodies (both producer and processor) to ensure the continuance of a nationally harmonised system. Both national producer and processor peak bodies have indicated they are not supportive of such exemptions.
- As with cattle, it is intended that PIRSA can continue to provide individual exemptions from such tagging requirements in extenuating circumstances, such as animals needing to be moved after a bushfire where tagging facilities have been destroyed.

**Legislative and/or financial implications**

- None

**Attachments**

- A. Letter of response to sheep producer Duan Williams



for

**CHIEF EXECUTIVE**

Department of Primary Industries and Regions

4/7/2023

<b>CONTACT</b>	Nathan Rhodes
<b>POSITION</b>	Executive Director
<b>DIVISION</b>	Biosecurity
<b>MOBILE and LANDLINE</b>	M 0412 376 450; P 08 8429 3135
<b>Cleared by</b>	Laura Bruce

**Gonos, Anthea (PIRSA)**

---

**From:** Trevor Smart <trevor.smart@nlc.sa.gov.au>  
**Sent:** Friday, 2 June 2023 5:00 PM  
**To:** PIRSA:Minister Scriven  
**Subject:** URGENT: Sheep Eid Implementation & Funding  
**Attachments:** minister scriven - sheep IED implementation.pdf  
  
**Categories:** Corro - General

You don't often get email from trevor.smart@nlc.sa.gov.au. [Learn why this is important](#)

Good afternoon Minister

Please find attached correspondence regarding implementation and funding of sheep eID at the Naracoorte Regional Livestock Exchange for your consideration.

I am more than happy to discuss further, including provision of our independent costings and designs.

I thank you for your consideration

Regards

Trevor  
M 0427 396934

**Trevor Smart**

Chief Executive Officer

Phone (08) 8760 1100  
Mobile 0427 396 934  
Email [trevor.smart@nlc.sa.gov.au](mailto:trevor.smart@nlc.sa.gov.au)  
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**Naracoorte Lucindale Council**

*Better by Nature*



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Naracoorte Lucindale Council

Better by Nature

Our Ref: CEO

2 June 2023

Clare Scriven MLC  
Minister for Primary Industries and Regional Development  
E: Minister.Scriven@sa.gov.au

Dear Minister

### Implementation and Funding Arrangements – Sheep eID

I write in regards to the proposed implementation of, and funding arrangements for sheep eID infrastructure.

As you would be aware, the Naracoorte Regional Livestock Exchange (NRLE - owned and operated by Council) is the premier livestock exchange in South Australia (and possibly Southern Australia). Livestock throughput across a 5-year average sees an approximate 500,000 sheep per annum, and 90,000 cattle per annum being sold through the NRLE.

The NRLE, although owned and operated by Council, is operated on the basis that it will be a self-funding enterprise, including all operational costs, and re-investment of funds into renewal of existing assets, and new assets. In 2022/23 we have invested approximately \$4M of new or upgraded infrastructure to ensure a high standard of service delivery and facility.

We wish to highlight to you the expected cost to the NRLE to implement sheep eID by way of infrastructure and equipment required. Council proactively undertook independent designs and costings in late November 2022 through ProWay Livestock & Equipment with a quoted cost of:

Sheep Receival Yards (including draft area)	\$1,877,601
Shelter over draft areas (inc scanning equipment)	\$271,690
CPI allowance of 8.6%	\$184,839
<b>Total Cost (ex GST)</b>	<b>\$2,334,130</b>

Through NRLE representatives past involvement with Livestock SA committees, and the consultation and information provision undertaken – this information had already been provided.

DeGaris Place (PO Box 555) Naracoorte SA 5271  
Telephone (08) 8760 1100  
Email [council@nlc.sa.gov.au](mailto:council@nlc.sa.gov.au)  
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Naracoorte Lucindale Council

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It is our understanding that funding arrangements between State and Federal Governments are being considered, and indeed, announcements may be made in the short-term. We also understand that any such funding announcements may be based upon independent costings, and an independent assessment of infrastructure required for saleyards and other livestock operations across South Australia.

We have significant concerns as to any independent advice that may indicate that implementation of sheep eID at the Naracoorte Regional Livestock Exchange can be undertaken at an estimated cost of \$1,1M, which is significantly less than what our actual costs would be, and indeed would potentially see a shortfall in funding required of some \$1.23M – which is significant and would seriously put at risk our ability to build the required infrastructure and equipment.

The NRLE Board has been steadfast in its position on implementation of sheep eID in that any such implementation costs need to be 100% funded by State and/or Federal Government. We are supportive of sheep eID, but not to the detriment of the financial sustainability of the NRLE.

I would be more than happy to discuss the above including provision of our costings and designs, but encourage you to consider the true and accurate independently sourced cost estimates of \$2.334M for implementation of sheep eID at the NRLE.

Many thanks for your consideration.

Yours faithfully

**Trevor Smart**  
**CHIEF EXECUTIVE OFFICER**



**Gonos, Anthea (PIRSA)**

---

**From:** PIRSA:Minister Scriven  
**Sent:** Wednesday, 26 July 2023 9:13 AM  
**To:** council@nlc.sa.gov.au  
**Subject:** eA199488 - Minister Scriven Correspondence  
**Attachments:** eA199488 - SMART, Trevor - CEO - Naracoorte Lucindale Council 25072023.pdf

MPIRD: eA199488

Dear Mr Smart

Please find attached correspondence from Minister Scriven regarding the implementation of sheep and goat eID in South Australia.

Kind regards

**Office of the Hon Clare Scriven MLC**

**Minister for Primary Industries and Regional Development**

**Minister for Forest Industries**

Government of South Australia | 1 King William Street, Adelaide

GPO Box 1671 Adelaide SA 5001

**T:** +61 8226 2931 | **E:** [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au)

[pir.sa.gov.au](http://pir.sa.gov.au)



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Mr Trevor Smart  
CEO Naracoorte Lucindale Council  
PO Box 555  
NARACOORTE SA 5271

[council@nlc.sa.gov.au](mailto:council@nlc.sa.gov.au)

Dear Mr Smart

Thank you for your letter of 2 June 2023 regarding the implementation of sheep and goat eID in South Australia.

The saleyard sector holds vital importance within South Australia's livestock supply chain, and I appreciate the essential role Naracoorte Regional Livestock Exchange (NRLE) plays on a weekly basis in livestock traceability.

I am grateful for your support for this important traceability reform as we work towards sheep and goat eID in our state and note your position on funding for your sector.

I recently announced that the Government of South Australia will deliver additional investment as part of the State Government's 2023-24 budget to support the implementation of the first stage of electronic identification (eID) for farmed sheep and goats.

The stage one financial package will provide:

- 75% subsidy for essential eID infrastructure within the sheep and goat supply chain; and
- 50% eID tag subsidy for producers for the 2023/24 and 2024/25 financial years.

The Naracoorte Regional Livestock Exchange will be eligible to apply for the infrastructure subsidy outlined in this announcement. This will apply to essential infrastructure to meet your legal NLIS obligations and will be subject to an application process. The details of the application process are currently being developed.

I look forward to notifying the supply chain of these details as soon I can.

Be assured that I am committed to supporting the South Australian sheep and goat industry transition to electronic identification to ensure that South Australia's sheepmeat, goat and wool sectors which are valued at \$1.6 billion and contributed \$788 million in export value in 2021-22 continue to thrive.

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

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Once again, thank you for writing to me to highlight these important issues associated with the transition to mandatory sheep and goat electronic identification.

Yours sincerely

A handwritten signature in blue ink that reads "C. M. Denwood". The signature is written in a cursive style with a small flourish at the end.

Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

25/7 / 2023



Minute to  
**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**

Ref: eA199488

For	Noting and/or Signature
Critical Date	Routine
Subject	<b>Funding for eID implementation in South Australian Saleyards</b>

### Synopsis

CEO of Naracoorte Lucindale Council Trevor Smart has written to you regarding sheep and goat eID implementation and funding. Naracoorte Regional Livestock Exchange (NRLE) is owned and operated by the Council and underwent independent design costings last year to establish the estimated cost of eID implementation at their facility.

Mr Smart is concerned that the advice provided to Government regarding the cost of eID in the saleyard sector is much less than the true cost of implementation.

Mr Smart and the NRLE Board strongly hold the position that implementation of sheep eID in South Australian saleyards need to be 100% funded by State and/or Federal Government.

### Recommendations

That you:

- Note the brief  
NOTED
- Sign the attached letter  
SIGNED / NOT SIGNED

Hon Clare Scriven MLC

**Minister for Primary Industries  
 and Regional Development**

**Minister for Forest Industries**

25 / 7 / 2023

**Ministerial Comments -**

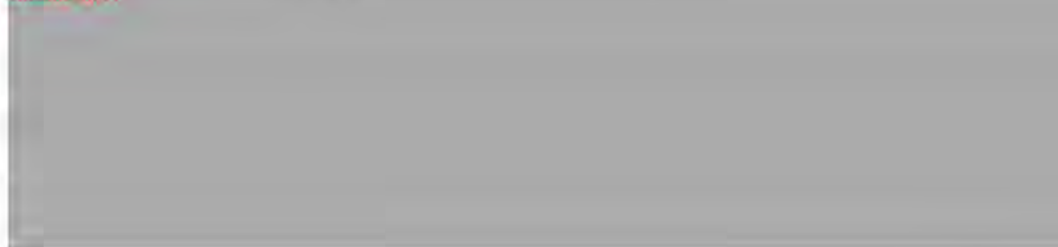
## Background

- In 2022, PIRSA's Red Meat and Wool Growth Program provided Livestock SA with \$140,000 to undertake a project to explore the costs and benefits of sheep and goat eID in South Australia, and to develop a state-based implementation and communication strategy. The project was governed by the Livestock SA Sheep and Goat Traceability Steering Committee (the Steering Committee).
- The Steering Committee included two representatives from the Department of Primary Industries and Regions (PIRSA), along with representatives from all sheep and goat industry sectors, including the saleyard sector.
- This work commenced in September 2022 with the engagement of a consultant to develop a Business Case for sheep and goat eID in South Australia (SA). The report was delivered to Government in February this year.
- Phase 2 of the project, consisting of a Transition Plan and Communication Strategy, was delivered to Government in May 2023. The Steering Committee made recommendations on how eID might be implemented in South Australia, and included key tagging and scanning timeframes, as well as resourcing priorities.
- This concluded the work of the Steering Committee and the Sheep and Goat Traceability Project.
- Last week you announced that the SA government will deliver additional investment as part of the State Government's 2023-24 budget to support the implementation of the first stage of electronic identification (eID) for farmed sheep and goats
- The package will support critical infrastructure across the supply chain and provide eID tag incentives for livestock producers.

## Discussion

- The Steering Committee's Business Case Report (The Report) outlines the real costs associated with implementing mandatory sheep and goat eID in SA.
- The Report indicates the upfront infrastructure cost required to install and establish eID throughout the SA sheep and goat supply chain, including saleyards, abattoirs, producers, stock agents, shows and depots.
- These are the essential infrastructure costs required from each sector to meet their legislative traceability responsibilities (i.e., minimum infrastructure required to enable the scanning and uploading of eID information to the National Livestock Identification System database).
- The costs to the saleyard sector were thoroughly considered in developing the Report.
- Relevant information was gathered via face to face, phone and survey results.

Clause 3(1)



Clause 2(1)

- The Report also noted key considerations, including that:
  - Costs will depend on the actual requirements implemented
  - Costs vary across supply chain and are intertwined with existing capital and operational renewals
  - Larger/complex sites require detailed site assessments to estimate costs. (Noting Victoria provided grants for site assessments during their eID implementation and NSW has also offered grants of \$5,000 to \$15,000 for site assessments at saleyards and abattoirs.)
- The Report split up the saleyard sector according to size and throughput.
- Naracoorte Regional Livestock Exchange (NRLE) is the largest saleyard in South Australia, with a throughput of over 600,000 sheep per annum, and it is the only saleyard in the 'large' category.
- The Report estimated the total cost to implement eID at NRLE was \$1.1 million. This cost included a combination of tag applicators, stick readers, pocket readers, eID auto draft, software, installation, and retrofitting.
- Mr Smart states in his letter that the independent design costings they undertook last year quote far greater figures than that provided in the Business Case Report. These costings included:
  - Sheep receival yards (including draft areas) – approx. \$1.87 million
  - Shelter overdraft areas - \$0.27 million
  - CPI allowance of 8.6% - \$0.18 million
  - Total cost (ex GST) - \$2.334 million
  - No details of the costings have been provided to determine if it is only essential infrastructure and required yard modifications included in the quote.
- Mr Smart notes that the NRLE Board is steadfast in its position that state and commonwealth government cover 100% of the total implementation cost.
- Last week you announced that the sheep and goat supply chain will have access to a 75% subsidy for essential eID infrastructure, leaving 25% to be covered by industry themselves. All saleyards will have access to this government subsidy.

Clause 1(1)

- Recipients need to pay a proportion (to encourage buy-in on equipment and align with the principle of industry and government sharing costs)
- Assistance timeline allows businesses to plan implementation and incentivise early adoption
- Equitable access is provided to businesses within each supply chain segment.
- The 75% funding announcement for supply chain essential infrastructure directly aligns with these principles and recommendations.
  - i.e., priority to high-risk biosecurity points, assistance structured to meet minimum legislative obligation, and that recipients need to pay a proportion (industry/government cost sharing)
- The ACIL Allen Business Case and figures within have not been publicly released.

**Stakeholder / regional impacts, consultation and engagement**

- The saleyard sector was directly engaged by the consultant engaged to develop the Business Case.
- Government plan to establish a PIRSA led Industry Advisory Committee with key supply chain representatives (including saleyard sector) to progress sheep and goat eID implementation in South Australia.

**Management of key risks**

- Nil

**Legislative and/or financial implications**

- None

**Attachments**

- A. Letter of response to Mr Trevor Smart, CEO Naracoorte Lucindale Council.



for

**CHIEF EXECUTIVE**  
Department of Primary Industries and Regions

21/6/2023

<b>CONTACT</b>	Nathan Rhodes
<b>POSITION</b>	Executive Director
<b>DIVISION</b>	Biosecurity
<b>MOBILE and LANDLINE</b>	0412 376 450
<b>Cleared by</b>	Laura Bruce

**Gonos, Anthea (PIRSA)**

---

**From:** PIRSA:Minister Scriven  
**Sent:** Tuesday, 12 September 2023 11:59 AM  
**To:** Duan  
**Subject:** RE: Sheep eID

Dear Mr Williams

On behalf of the Minister for Primary Industries and Regional Development and Minister for Forest Industries, I acknowledge receipt of your email of 11 September 2023 about livestock traceability and Sheep eID.

Your correspondence will be brought to the attention of the Minister.

Yours sincerely

**Office of the Hon Clare Scriven MLC****Minister for Primary Industries and Regional Development****Minister for Forest Industries**

Government of South Australia | 1 King William Street, Adelaide

GPO Box 1671 Adelaide SA 5001

**T:** +61 8226 2931 | **E:** [Minister.Scriven@sa.gov.au](mailto:Minister.Scriven@sa.gov.au)[pir.sa.gov.au](http://pir.sa.gov.au)

*The Department of Primary Industries and Regions respects Aboriginal people as the state's first people and nations. We recognise Aboriginal people as traditional owners and occupants of South Australian land and waters. We pay our respects to Aboriginal cultures and to Elders past, present and emerging.*

Disclaimer: The information in this email may be confidential and/or legally privileged. Use or disclosure of the information by anyone other than the intended recipient is prohibited and may be unlawful.

**From:** Duan <[duan.w@bigpond.com](mailto:duan.w@bigpond.com)>**Sent:** Monday, 11 September 2023 2:06 PM**To:** PIRSA:Minister Scriven <[minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)>**Cc:** Nick McBride <[mackillop@parliament.sa.gov.au](mailto:mackillop@parliament.sa.gov.au)>; Nicola Centofanti <[nicola.centofanti@parliament.sa.gov.au](mailto:nicola.centofanti@parliament.sa.gov.au)>;Tony Passin <[Tony.Pasin.MP@aph.gov.au](mailto:Tony.Pasin.MP@aph.gov.au)>; President <[president@livestocksa.org.au](mailto:president@livestocksa.org.au)>**Subject:** Sheep eID

Good afternoon Minister Scriven,

I'd like to bring to your attention, an article that was included in an email circulated by the organization, 'Integrity Systems' last week.

Some background about ISC.

From Integrity Systems web site:

#### **What we do**

ISC manages and delivers the Australian red meat industry's three key on-farm assurance and through-chain traceability programs

- Livestock Production Assurance (LPA) program
- LPA National Vendor Declarations (LPA NVD) and
- National Livestock Identification System (NLIS)

Together, these three elements ensure the food safety and traceability of Australian red meat for our domestic and international customers and protect Australia's access to over 100 export markets.

The article:

See Appendix A below.

Link:



**Livestock traceability essential  
for global market access**  
integritysystems.com.au

Key points from the article:

- Traceability is critical to protecting market access
- Integrity system compliance is everyone's job

- NVDs and eNVDs must be clear, complete and correct
- 

Designed to record livestock history and on-farm practices along the red meat supply chain, Jake sees NVDs as a declaration of food safety and traceability. As such, it's essential when filling out an NVD that it is clear, complete and correct.

“The biggest non-compliance issue we have with NVDs is that the form is not completed correctly. This can impact the entire supply chain, and potentially, access to our global markets. An incomplete NVD means we need to chase up the producer because their declaration about the livestock consigned to GMP is not considered valid. Not only is this time consuming, but there is a flow on effect because it can create issues on our sell side.”

“Our customers require proof that they are buying the product listed on the NVD. Based on that requirement, the impact of an incomplete NVD could be reduced market access,” said Jake.

When transporters arrive at the front gate of the processing facility, they are asked to confirm the number of animals on the truck. They then proceed to the yards and hand over the corresponding NVD.

The NVD is then signed off by the GMP's Lairage Manager who confirms that the number of livestock consigned to the processor is a match at both pick-up and delivery points.

By their own admission, this article demonstrably highlights that the failings in traceability in the sheep meat industry, that have plagued the mob based system and pose any risks to market access, are results of non-compliance with the requirements of the NVD.

Even with the addition of a \$2/head eID ear tag, the signed NVD remains the essential component to ensure traceability and food safety. It is this signed declaration that underpins the confidence and trust between production and market access.

Note, there is no mention of a requirement for individual animal identification in this, an article explaining the importance of traceability, from a company processing over a million lambs each year, and *“exporting its lamb products to over 70 countries around the globe”*

The knee jerk reaction to insist on individual identification of all sheep and goats (as a result of the recent FMD incursion scare), has failed to acknowledge that this is the same system we have in the cattle industry (for about two decades now), which does not solve the traceability shortcomings. In fact reported traceability outcomes from the cattle sector are only marginally better than the current mob based system in sheep, even with the mob based systems failures, extensively documented to be attributed to non compliance with the NVD's.

So once again, I ask the question, how serious about traceability is our industry, really?



As a sheep producer in South Australia, if I don't pay \$66 to renew my PIC number every 2 years, the penalty is that I am ineligible to trade.

If I don't complete the LPA Accreditation every 3 years, the penalty is that I am ineligible to trade.

If I don't accurately fill in an NVD (a legally binding document, the cornerstone to traceability and food safety) when trading sheep and keep the NLIS database updated with my mob movements, the penalty is a warning letter. If I am a repeat offender, the penalty is another warning letter, and so on, at no point is my eligibility to trade under scrutiny. Whilst there is the mechanism to be issued with a fine for non-compliance, our committee representative who works within the NLIS system, told me that this is scarcely, if ever, enacted.

So how serious are we about traceability? And if it is the profound export trading obstacle we are being led to believe, why haven't the failures to comply with the current system been addressed earlier??

These non-compliance failures could be rectified in an instant, with very little additional cost, if any. Why has this not been done, or at least attempted??

The truth of the matter is that the very same people that have failed to adequately administer and coordinate the current mob based system (which again, is well documented to be perfectly capable in every requirement), are the same people that have conjured up this reformed system. The creation, implementation and administration of this new system creates more bureaucracy, more jobs for those that do not produce anything. This new system, whilst demanding much greater cost and effort from the sheep producers, ironically is every bit as reliant on the requirements of the current system, which have been disrespected to the point of failure.

This is not the fault of the system, it is the fault of those who have failed to correctly administer the system - the same people designing and poised to administer the new system - what would you expect the outcome to be?

We are now faced with a scenario where commercial sheep producers, particularly those who supply full, exclusive loads of lambs, to meat processors (accounting for between a third and a half of all processed sheep meats) are going to be forced to purchase, apply, double check and reapply any missing eID devices, all at their own expense, which will have absolutely zero impact on traceability, biosecurity, food safety or market access (as demonstrated by NZ's firm stance that the introduction of eID devices in sheep is unnecessary, they sell 9 times more sheep meat into European markets than we do).

Why can't full loads of sheep, from their place of birth, traded directly to slaughter, be exempt from eID devices? - particularly now, at a time when for the producer, sheep meat has at least halved in value, in some instances sheep to be slaughtered have zero commercial value. Coarse wool is a third of its former value, to the point that it now fails to cover the costs of shearing, whilst all expenses continue to rise.

In response to your most recent reply to the questions I posed, none of which were answered by the way (presumably because you simply don't have the answers to those very basic questions), you again make a number of claims that are simply not true, unfounded and have in fact been proven to be untrue (with references to data and studies accessible to myself as a member of the SA Sheep and Goat Traceability Steering Committee).

Below are a number of excerpts from your reply to me, with the addition of my response to each statement.

*"As outlined in previous correspondence, I do not support tag exemptions beyond those that already exist in the system for critical reasons of biosecurity and traceability, market access and food safety."*

As the article above concisely demonstrates, biosecurity, traceability, market access and food safety are all underpinned by the signing of the declaration, the NVD. When traded from their place of birth directly to slaughter,

the addition of an electronic device to an animal gives absolutely no benefit to any of these criteria. To insist otherwise is a direct denial of reality.

*Electronic identification has been proven more effective than the mob-based system in key areas of accuracy, speed and efficiency of tracing. These factors are critical in our ability to rapidly identify, trace and control an exotic animal disease outbreak.*

This statement is simply not true. I have provided you with the data of trials such as "Exercise Tuckerbox" which in fact when tracing a simulated disease, preferred to use the mob based data when comparing the traceability capabilities of the mob based sheep system against the individual based cattle system. They found the mob based system to be much faster, and equally as accurate.

*"eID technology will also provide an essential tool in demonstrating proof of freedom - essential to regain lost market access."*

This is simply not applicable for animals that have never left their place of birth. Anyone in tune with the livestock industries would know this.

Can I remind you, these are supposed to be reasons to compel sheep producers to spend tens of millions of additional dollars, every year, forever.

*"Like my interstate ministerial counterparts, I support a nationally consistent traceability system that provides greater transparency in the supply chain and enhances our biosecurity. Our trading partners and consumers are increasingly demanding greater assurances in food safety and product traceability."*

Unfounded support for a system, simply because your counterparts support it, only displays a level of contempt for those who will suffer the ramifications of these baseless decisions.

Despite my many requests as a member of the SA Sheep and Goat Traceability Steering Committee, not one shred of evidence was presented to verify the claims that any trading partners or consumers were 'demanding greater assurances'

We already have world leading food safety standards and product traceability - proven and documented to be capable.

In the case of animals being traded directly to slaughter from their place of birth - there is no more information to give, everything there is to know about the animal and its origin is already on the NVD, as pointed out in the article quoted above.

If you have any evidence that an eID tag provides additional information, I plead that you explain how this is so, rather than hiding behind generalist and meaningless statements.

My argument has always been, if we want to enhance our already capable system, it must be accompanied with a cost benefit analysis - without this, how do we know that our decisions are economical?

From my involvement in this debate it is clear that when it's not your own money at stake, the economics don't seem to matter.

*I would be pleased to provide you with details of the state government's support package for eID devices and essential eID infrastructure once the details have been finalised. The government will be providing further details to the industry on the eligibility and application process in the coming weeks.*

A point that I can't seem to get through to those who will not incur any financial consequences of this proposed mandate is that it doesn't matter where the money comes from, the sheep producers will inevitably pay for 100% of the additional costs.

When you say 'the state governments support package' where do you believe these funds come from? Does this government have a huge unaccountable reserve of cash somewhere to distribute at their discretion, or are we still operating under the age old taxation system where the money is actually ours to begin with?

About this time last year I heard you announce that this endeavor was going to be industry led. The livestock industry has many components between producing the animal and the end consumer. No matter how you try to 'share the costs' amongst the stakeholders, all costs from any other sector of the industry can and will inevitably be passed onto the producer, who has no alternative but to absorb it.

Wouldn't you think they, (sheep producers) deserve to be duly consulted and their concerns and desires be taken seriously?

Rather, producers' input is being discarded and ignored and many industry organisations, entirely funded by the producers, are securing lucrative additional administrative requirements whilst the wishes of the unencumbered meat processors are being gladly granted.

As livestock producers, we fund LSSA to represent us in matters pertaining to our industry. The Sale yards do not contribute any funds to LSSA, the livestock transporters do not contribute any funds to LSSA, the meat processors do not contribute any funds to LSSA.

To my mind a huge conflict of interest is causing LSSA to act on behalf of the Saleyards, the meat processors and the desires of the government, whilst ignoring the desires and concerns of the sheep producers. LSSA stand to gain additional administrative funding if this proposal is accepted (as outlined in the business case produced by ACIL Allen - 8 full time staff to be employed to implement the mandate). It is my opinion that LSSA be required to formally announce that in no way will they gain any financial outcomes from this eID mandate. Short of a similar assurance, one can only assume that LSSA are acting for their own interests rather than that of their membership.

I also believe that Integrity Systems need to be held responsible for their failings. They seem to be a driving force in mandating an eID system in sheep and goats.

About Integrity Systems - again from their web site:

#### *How we are funded*

*Management of the integrity system is funded predominantly by industry levies, incorporating a mixture of both research and marketing levies. Income is also received from the sale of NVD books and the LPA accreditation fees (\$66 including GST per PIC every three years). This income is allocated back into the program supporting education and extension activities related to improving awareness, understanding and adoption of best practices under the LPA program.*

#### *How we are governed*

*ISC is governed by a skills-based Board, responsible for providing advice and guidance on how policies and standards are incorporated into the delivery of the industry's integrity systems.*

Why is Integrity Systems (a body entirely funded by livestock producers, and it's skills-based board not accountable to said producers), being allowed to dictate and proceed in developing an individually based tracing system in the sheep and goat industries when they are responsible for the well documented failures of the current mob based system? - which if competently managed would fulfill all of the industries needs.

I have no doubt that if the investigation of the current system was undertaken by an independent body rather than the organization that stand to enhance their own validity, it would be announced that Integrity Systems have undoubtedly failed in their task of managing the current system, permitting its failures, ergo Integrity Systems obviously do not have the competence or desire to effectively manage a revised system.

Furthermore, from the Stock Journal August 17th 2023, page 3

*“Stock Journal understand that PIRSA is establishing a Sheep and Goat eID Implementation Project Industry Advisory Committee. It will be chaired by PIRSA and include a cross section of the industry including Livestock SA, agents, transporters, processors and Integrity Systems.”*

All of the groups listed here to be consulted are self-serving organisations, of course they want to see more money spent in the industry, it lines their pockets at the expense of the producer, how could you possibly expect to yield an optimum outcome for the industry? - this is unbelievable and unacceptable!

Again, as with the former Sheep and Goat Traceability Steering Committee, there is no mention of including sheep producers - by far the largest of the stakeholders, have by far the greatest investment in the industry and the only sector of the industry to forever be financially burdened by this mandate. If you think that LSSA are an adequate representative of sheep producers, you are sorely mistaken. They have already shown that they are far more interested in appeasing the bureaucracy and securing additional funding for themselves than consulting with the hand that feeds them. I have a list of at least one hundred commercial sheep producers that have contacted me personally, via phone and many in writing, objecting to LSSA's position and bewildered by their deliberate lack of consultation and communication.

It has become glaringly obvious that those to be burdened with the cost of this pseudo-advancement in sheep and goat traceability, are not being duly consulted or regarded in any significance other than their vulnerability to have hard earned wealth forcefully extracted to further enable the growth of bureaucracy.

Could I ask that rather than replying with yet another generic prefabricated response, containing all of the baseless and unfounded statements that I have become all too familiar with - as well as addressing the questions I have posed, could you provide a compelling rationale for being unwilling to stand up to your counterparts and properly represent your constituents in their time of need.

Sincerely,  
Duan Williams

Appendix A:

# Livestock traceability essential for global market access

05 September 2023

## Key Points

- Traceability is critical to protecting market access
- Integrity system compliance is everyone's job
- NVDs and eNVDs must be clear, complete and correct
- eNVD is the faster, easier way to complete livestock consignments

Since setting up business in 1974, Gundagai Meat Processors (GMP) has grown from processing around 5,000 lambs each year to over one million.

With a state-of-the-art processing facility and one of the most advanced lamb carcase chillers in the world, GMP is also a significant employer in the Southern Tablelands region of NSW.

A key to the processor's success has been building trusted, long-term partnerships with its customers – both domestically and internationally.

Today, GMP is approved to export its lamb products to 70 countries around the world.

As supply chain coordinator for GMP's Gundagai Lamb brand, Jake Bourlet is a firm believer that lifetime traceability of livestock is critical to the industry's global market access.

Central to this is complying with Australia's red meat integrity system, including:

- Livestock Production Assurance ([LPA](#))
- National Livestock Identification System ([NLIS](#))
- LPA National Vendor Declarations ([NVDs](#))

Compliance is key

"At GMP, we are committed to surpassing the requirements of our customers, whether Australian-based or overseas. LPA NVDs help us to achieve this and uphold the standards that our customers demand and have come to expect," Jake said.

Designed to record livestock history and on-farm practices along the red meat supply chain, Jake sees NVDs as a declaration of food safety and traceability. As such, it's essential when filling out an NVD that it is clear, complete and correct.

**"The biggest non-compliance issue we have with NVDs is that the form is not completed correctly. This can impact the entire supply chain, and potentially, access to our global markets. An incomplete NVD means we need to chase up the producer because their declaration about the livestock consigned to GMP is**

**not considered valid. Not only is this time consuming, but there is a flow on effect because it can create issues on our sell side.”**

“Our customers require proof that they are buying the product listed on the NVD. Based on that requirement, the impact of an incomplete NVD could be reduced market access,” said Jake.

GMP follows a clear process when it comes to accepting livestock deliveries to mitigate the risks associated with incorrect NVDs.

When transporters arrive at the front gate of the processing facility, they are asked to confirm the number of animals on the truck. They then proceed to the yards and hand over the corresponding NVD.

The NVD is then signed off by the GMP’s Lairage Manager who confirms that the number of livestock consigned to the processor is a match at both pick-up and delivery points.

Jake also points out that the National Livestock Identification System(NLIS) has an important function as part of the integrity system.

“NLIS is a key piece of the puzzle. The NLIS accredited tag or device attached to an animal allows full traceability of its movements for life, while LPA provides assurance to purchasers that on-farm practices are of an acceptable standard.”

“Australia’s red meat integrity system is critical to the entire red meat value chain. Every single person needs to play their part. Not just processors, but agents, saleyard operators, feedlots, transporters and producers. The system supports lifetime traceability – from on-farm through to processing - and ultimately underpins continued growth of red meat sales,” Jake adds.

eNVD is the future Innovation and the adoption of new technologies is central to GMP’s philosophy, so switching to electronic NVDs (eNVDs) is a no brainer as far as Jake is concerned.

“Completing livestock consignments electronically not only saves time, but it provides new levels of visibility when it comes to tracking an animal. It’s great to see a steady increase in the number of eNVDs coming through GMP. It’s definitely the way of the future.”

The mobile-friendly, more user-centric version of the eNVD system is available for LPA-accredited producers, feedlots and value chain stakeholders. The eNVD allows you to save time by only answering questions once, pre-populating your regular consignments, and printing at any time – even completing at the yards, if needed.

eA199518



Government  
of South Australia

The Hon Clare Scriven MLC

Mr Matt Ashby  
President  
Merino SA  
PO Box 108  
GOODWOOD SA 5034

Clause 3(f)

Dear Mr Ashby

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

Our 2023-24 budget package will assist the supply chain in the first stage of the eID transition through:

- a 50% per eID tag subsidy in 2023-24 and 2024-25 for newborn lambs and kids.
- a 75% subsidy on essential infrastructure required for implementation of eID across the supply chain.
- A 50% retrospective subsidisation on all National Livestock Identification System (NLIS) accredited eID tags purchased from 01 January 2023.

South Australia's package is in addition to the Federal Government's contribution, which together will help sheep and goat producers transition to the new system with a national start date of 1 January 2025.

If you would like to discuss this package further please feel free to contact my office on 08 8226 2931 to arrange a meeting.

Yours sincerely

A handwritten signature in blue ink that reads 'Clare Scriven'.

Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

317 / 2023

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)

eA199518



**Government  
of South Australia**

The Hon Clare Scriven MLC

Mr Gerard Leach  
Chairman  
Australian Livestock Saleyards Association Inc.  
4 Corio Bay Court  
CLIFTON SPRINGS VIC 3222

Clause 6(1)

Dear Mr Leach

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

3 / 7 / 2023

**Minister for Primary Industries and Regional Development**  
**Minister for Forest Industries**

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)







Mr Chris Manser  
Southern Director  
Australian Livestock and Property Agents Association  
Green Triangle Livestock & Real Estate  
PO Box 117  
MOUNT GAMBIER SA 5290

Clause 8(1)

Dear Mr Manser

*Chris*

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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Yours sincerely

*Clare Scriven*

Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

3 / 7 / 2023

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
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eA199518



Government  
of South Australia

The Hon Clare Scriven MLC

Mr Andrew Lepley  
South Australian Saleyards  
Livestock Markets LTD - Dublin Saleyards  
PO Box 2  
DUBLIN SA 5501

Clause 6(1)

Dear Mr Lepley

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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Yours sincerely

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Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

3 / 7 / 2023

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)





Mr Peter Baldwin  
CEO  
Australian Livestock and Property Agents Association  
SFV House  
2 Barrack Street  
SYDNEY NSW 2000

Clause 6(1)

Dear Mr Baldwin

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- A 50% retrospective subsidisation on all National Livestock Identification System (NLIS) accredited eID tags purchased from 01 January 2023.

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Yours sincerely

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Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

317 / 2023

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
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eA199518



Government  
of South Australia

The Hon Clare Scriven MLC

Ms Kerry Stockman  
Admin Manager  
Ag Excellence Alliance  
PO Box 138  
BURRA SA 5417

Date: 07/11

Dear Ms Stockman

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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3 / 7 / 2023

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Mr Patrick Hutchinson  
CEO  
Australian Meat Industry Council  
PO Box 1208  
CROWS NEST NSW 1585

Clause 6(1)

Dear Mr Hutchinson

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

Our 2023-24 budget package will assist the supply chain in the first stage of the eID transition through:

- a 50% per eID tag subsidy in 2023-24 and 2024-25 for newborn lambs and kids.
- a 75% subsidy on essential infrastructure required for implementation of eID across the supply chain.
- A 50% retrospective subsidisation on all National Livestock Identification System (NLIS) accredited eID tags purchased from 01 January 2023.

South Australia's package is in addition to the Federal Government's contribution, which together will help sheep and goat producers transition to the new system with a national start date of 1 January 2025.

If you would like to discuss this package further please feel free to contact my office on 08 8226 2931 to arrange a meeting.

Yours sincerely

A handwritten signature in blue ink that reads 'Clare Scriven'.

Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

3 / 7 / 2023

Minister for Primary Industries and Regional Development  
Minister for Forest Industries

GPO Box 1671 Adelaide SA 5001  
Telephone 08 8226 2931 | Email [minister.scriven@sa.gov.au](mailto:minister.scriven@sa.gov.au)





Ms Linda Schmidt  
Dairy Goat Society of South Australia  
PO BOX 97  
CAMBRAI SA 5353

Clause 6(1)

Dear Ms Schmidt

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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Ms Bonnie Skinner  
CEO  
Sheep Producers Australia  
Level 2 Burns Centre  
28 National Circuit  
FORREST ACT 2603

**Clause 171**

Dear Ms Skinner

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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Government  
of South Australia

The Hon Clare Scriven MLC

Ms Chalien Bayliss  
Secretariat  
SA Country Shows,  
Australian Stud Sheep Breeders Association  
Royal Agricultural & Horticultural Society of South Australia  
PO Box 108  
GOODWOOD SA 5034

Cause 6(1)

Dear Ms Bayliss

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
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Government  
of South Australia

The Hon Clare Scriven MLC

Mr John Falkenhagen  
President  
Goat Industry Council of Australia  
PO Box 81  
MENINGIE SA 5264

Clause 6(1)

Dear Mr Falkenhagen

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
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Government  
of South Australia

The Hon Clare Scriven MLC

Ms Jo Hall  
CEO  
WoolProducers Australia  
Locked Bag 9  
BARTON ACT 2604

Clause 6(1)

Dear Ms Hall

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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Government  
of South Australia

The Hon Clare Scriven MLC

Ms Stephanie Whitaker  
Interim Executive Officer  
Australian Livestock Markets Association Inc  
PO Box 833  
MUDGEE NSW 2850

Clause 8(1)

Dear Ms Whitaker

I write to inform you that the Malinauskas Labor Government is investing over \$9 million as part of the 2023-2024 State Budget to support the implementation of the first stage of eID for sheep and farmed goats. The package will support critical infrastructure across the supply chain and provide eID tag subsidies for producers.

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Yours sincerely

A handwritten signature in blue ink, appearing to read 'C. M. Scriven'.

Hon Clare Scriven MLC  
**MINISTER FOR PRIMARY INDUSTRIES AND REGIONAL DEVELOPMENT**  
**MINISTER FOR FOREST INDUSTRIES**

3 / 7 / 2023

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**Gonos, Anthea (PIRSA)**

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**Subject:** 4 - 4:30pm MEETING | Minister & LIVESTOCK SA | MEAGAN |  
**Location:** Level 10, 1 King William St ADELAIDE

**Start:** Mon 22/05/2023 4:00 PM  
**End:** Mon 22/05/2023 4:30 PM

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** Minister Scriven Calendar  
**Required Attendees:** Livestock Ceo; President

## Gonos, Anthea (PIRSA)

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**Subject:** 9 - 9:30am | MEETING | Minister & Livestock SA |  
**Location:** Level 10, 1 King William St Adelaide

**Start:** Mon 5/06/2023 9:00 AM  
**End:** Mon 5/06/2023 9:30 AM

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** Minister Scriven Calendar  
**Required Attendees:** Livestock Ceo; Allan@illoura.com.au

## Gonos, Anthea (PIRSA)

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**Subject:** 9am - 10am | Teams Meeting | Minister & Livestock SA |  
**Location:** Microsoft Teams

**Start:** Tue 6/06/2023 9:00 AM  
**End:** Tue 6/06/2023 10:00 AM

**Recurrence:** (none)

**Meeting Status:** Meeting organizer

**Organizer:** Minister Scriven Calendar  
**Required Attendees:** Livestock Ceo; Allan@illoura.com.au

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## Microsoft Teams meeting

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[sagov@m.webex.com](mailto:sagov@m.webex.com)

Video Conference ID: 132 401 674 8

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**Or call in (audio only)**

[+61 8 7079 7539,756368270#](tel:+61870797539,756368270#) Australia, Adelaide

Phone Conference ID: 756 368 270#

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