



QUEENSLAND
FARMERS'
FEDERATION



Feedback on livestock and production chapter February 2026

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This submission is provided to:

Australian Animal Welfare Strategy

Submitted via email: aaws@aff.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- CANEGROWERS
- Greenlife Industry QLD
- eastAUSmilk
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

QFF welcomes the opportunity to provide feedback on the Draft Livestock and Production Chapter. We provide this submission without prejudice to any additional submission from our members or individual farmers.

Overview

Feedback on the proposed Livestock and Production Chapter is given below. Queensland Farmers' Federation (QFF) acknowledges the importance of the livestock chapter and the difficulties of including many breeds with entirely different taxonomies and physiologies in the one chapter. QFF advocates that animal welfare requires assurances for the health and welfare of animals whilst also ensuring the need for profitable enterprises that allows Australia to continue to ensure food and fibre security.

The Government is a key stakeholder, as are producers and the non-government organisations (NGO's). There is a real space and opportunity for Government to help producers lead national conversations on the great animal welfare stories we have in Australia. It helps mitigate false narratives, which ultimately hurt our trading relationships and in the event of trespass, risk flock safety (and biosecurity requirements) in poultry as well as other livestock. There could be a greater space for this generally in the strategy.

Detailed comments are below.

Purpose

Critical gaps and omissions:

- The lack of a purpose is an omission in this chapter. The purpose of the chapter is not clearly explained and is not linked back to the vision and National Statement on Animal Welfare. Under the leading paragraph titled *Purpose*, it says the purpose “considers” the welfare of livestock in production systems and then mentions the content of the chapter. This is inadequate.
- The purpose is critical to understanding why the document exists and would connect the following parts of the chapter to a common thread, all linked back to the vision and

national statement. Knowing the purpose of the document drives clarity and content of the remaining chapter. The purpose helps focus target audiences and strategies e.g. establishing Australia's credentials for export markets and raising animal welfare standards are quite different and would have different target audiences and strategies.

Scope

Accuracy and clarity:

- Definition of livestock and exclusions: Given the many different livestock industries that are not specifically mentioned e.g. llamas, alpacas, camels, ratites etc but would likely be included in this chapter, a definition is important. Also, for exclusions e.g. pets on hobby farms and support animals such as working dogs and presumably horses, it is not clear why these animals, are excluded
- In general, QFF does not have major problems with the scope for the chapter however notes the great variation in species that are part of this group It includes avian species, monogastrics, ruminants, reptiles (crocodiles) and rabbits all presenting quite different needs for health and welfare.

Roles and responsibilities

Critical gaps and omissions:

- Producer's high responsibility yet under-recognition of their role in the system: The draft strategy fails to recognise that producers hold primary responsibility for day-to-day animal husbandry and are central to achieving animal welfare outcomes. This suggests a limited understanding within government of who has direct operational responsibility and accountability.
- Role of industry peak bodies not adequately portrayed: The strategy needs to better acknowledge the essential role of peak industry bodies. They are not only communication channels; they are integral to policy development and play key roles in regulatory, assurance, and third-party welfare frameworks.
- Over-emphasis on consumers/community and the role they place: The document places disproportionate weight on consumer/community perspectives, despite most consumers having limited knowledge of contemporary farming practices.

Accuracy and clarity:

- The list of stakeholders and their roles are presented very simplistically, are not comprehensive and not consistently described across the sectors mentioned. Roles and responsibilities, imply recognised contributions to expected standards that are embedded in legislation or agreed collaborative plans. Rather than calling it roles and responsibilities, QFF suggests it is referred to as Sector Interests and Contribution to Animal Welfare. Grouping retailers and non-government organisations as community is also a mismatch.

- The descriptors in the industry section need to have more depth. The current wording understates the critical role that industry bodies play in safeguarding animal health and welfare and in supporting effective regulatory outcomes. It focuses primarily on information sharing and voluntary guidance, without recognising the significant leadership, coordination, compliance support, and biosecurity functions these organisations perform across the supply chain. In addition, the draft does not adequately reflect the role of industry bodies in providing structured, evidence-based feedback on public policy and regulatory development, or their function as a key interface between government, industry, and the community.
- Another option: If the purpose of this section is just to list the wide variety of contributors, another option would be to put these in a diagram. However, If the purpose of this section is to showcase the depth and commitment to animal welfare across sectors, then much more detail needs to be added. The latter approach is preferred.

Snapshot

Critical gaps and omissions:

- The Snapshot refers to the primary role of government being primarily to regulate international trade. However, what is the role of the Australian government in relation to biosecurity where it may intersect with animal welfare. Animal disease is a major threat to animal welfare and explains why, in the case of the egg industry, why decisions are made to house flocks indoors during incursions. This reflects housing orders around the globe in the instance of high pathogenicity avian influenza (HPAI). The section on the role of AWTG also does not mention any role for this decision-making body for biosecurity aspects that may touch on welfare.
- Lack of intensive industry representation in the chapter and its case study. The absence of intensive industries from the chapter apart from a single mention in the scope, is a major gap, given it supports Australia's most consumed meat proteins. A case study from these sectors is recommended to balance the current emphasis on dairy, beef, sheep and goats.
- The omission of the pig and poultry sector is especially significant given that poultry and pork are among the largest contributors to domestic animal protein consumption in Australia and play a central role in national food security, affordability, and nutrition.
- Chicken meat is Australia's most consumed animal protein, and the pork sector also makes a substantial contribution to domestic supply. Excluding these industries from a high-level overview risks presents an incomplete and unbalanced picture of the livestock sector, particularly in a document intended to inform national policy and regulatory settings. Given the scale, economic importance, and public visibility of the poultry and pork industries, as well as their substantial engagement with animal welfare standards, sustainability frameworks, and export and domestic markets — their absence in this section is not appropriate.
- No mention of other animals included in the scope. The snapshot focuses exclusively on ruminant and small-stock industries (dairy, cattle, sheep and goats), and as well as

the omission of pig and poultry sectors, does not mention other animals included in the scope which include crocodiles, deer and rabbits.

- It is recommended that the snapshot be revised to explicitly include poultry and pork production, alongside relevant production, processing, consumption and export data, to ensure the document accurately reflects the full scope of Australia's livestock industries and supports balanced, evidence-based policy development.

Accuracy and clarity:

- In the first paragraph of the Snapshot, the reference to numbers of animals in Australia is misleading. The paragraph refers to dairy cattle numbers and then other ruminant species going to be processed for meat. There are many more animals being kept on farm. For example, it says 7.7 million head of cattle were processed for meat in 2023-24; however, the total number on farm is estimated as 28.2 million for the same period (ABARES). The intensive animal industries need to be included. The size of the industries might be better compared by their economic value.
- In the 5th paragraph of the Snapshot, the reference to the major supermarkets having committed to various policy positions related to animal welfare is now more fluid. Given the market restraints post HPAI outbreaks in the southern states, there are now delays in supermarket policy decisions.
- A clearer structure for the snapshot of the industries would enhance clarity. A clearer approach could include:
 - Overview: An accurate size and description of the industries and their contribution to food security
 - The framework of paddock to plate: The inter-relatedness of the whole supply chain from genetics to breeders to growers to transport, to places of process should be illustrated to show continuity of care through the life cycle of the animal.
 - Achievements: The importance of animal welfare and the advances in animal welfare made over the last 50 years including current standards and regulations. Also included would be industry quality assurance schemes, certification programs and sustainability frameworks.
 - Continuous improvement in regulation, strong research base, adoption of research based on science, recognised welfare credentials. Only include case studies that enhances the chapter text on achievement and continuous improvement – the current case study examples need improvement and should reflect the scale and significance of the industries, particularly those of the intensive animal industries. This would strengthen the Chapter's relevance, improve balance and ensure that policy development is informed by the realities of all major production models.
 - Future directions: Give examples that relate directly back to the vision or processes that enable the vision.
 - The reference to overseas projects (ACIAR) in the middle of the Snapshot section needs to be put in context to the Chapter's purpose. Depending on the purpose, it could possibly be put under *Achievements* to illustrate Australia's commitment to animal welfare beyond Australia.

Opportunities for the sector

Concerns with the “opportunities” section:

- This section should be reconsidered or removed. Identifying opportunities before the overarching framework is finalised risks them becoming outdated or being prematurely treated as actions. It is difficult to assess these chapters without clarity on how they will align with the final framework. Further to this, opportunities are best determined by industry and should be adaptable to research, political changes and industry needs, not documented in a finite manner.

Critical gaps and omissions:

- With reference to the second dotpoint, harmonisation is key, but in terms of adoption, the use of the word “rapid” (without the right context) is not the right descriptor. Where changes are required, the practical implications on producers are high. This is a time/money/educational issue where an appropriate level of time and support from government must be considered.
- The dot points do not correlate with the 6 areas set out in the National Statement on Animal Welfare i.e. leadership and coordination, standards and implementation, reporting and compliance, research and development, education and communication and international engagement.
- In particular, the ability to capture the minds and passions of all the different sectors and to work collaboratively together towards common agreed goals is a key opportunity that would make a significant difference to animal welfare in Australia. This is missing in this section.
- Also missing is selling the good stories of animal welfare and to build a solid reputation of excellence based on science. This would give everyone confidence that our animal industries have adopted welfare standards that meet our vision and community and export markets expectations.

Summary conclusion

The document requires:

- Inclusion of all the animal industries, especially the intensive animal industries which have been omitted from all aspects of the draft chapter except the scope.
- Clear connection back to the vision and The National Statement on Animal Welfare so that it flows in a logical manner.
- A clear and strong purpose to guide the chapter.
- Opportunities that include a unifying culture of collaboration and respect and include at least one strategic dot point from each of the 6 areas under the National Statement on Animal Welfare.
- Strong recognition of achievements in particular industry achievements e.g. o <https://www.abc.net.au/news/2024-10-26/maternity-ring-protects-piglets-animal-welfare-pork-industry/104507492> Development by SunPork, RSPCA involvement

- Collar technologies for dairy cows for cow health, behaviours and productivity <https://pmc.ncbi.nlm.nih.gov/articles/PMC11815998/>
- Antimicrobial stewardship in the Australian Chicken meat Industry https://chicken.org.au/wp-content/uploads/2023/07/ACMF_chicken-meat-AMS-report_Version2_FINAL-1.pdf
- Automated real time monitoring of bird and flock movement and behaviour in the egg industry https://www.australianeggs.org.au/assets/research/documents/Automated-real-time-monitoring-of-bird-and-flock-movement-and-behaviour_Final_OCT-22.pdf.

Yours sincerely

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