

12 February 2020

Australian Dairy Plan Feedback
Australian Dairy Industry Council
Orion House, Level 2
22 William Street
MELBOURNE VIC 3000

Via email: contact@dairyplan.com.au

Dear Sir, Madam

RSPCA Australia submission - Joint Transition Team Report & Draft Australian Dairy Plan

Thank you for the opportunity to provide feedback on the *Draft Australian Dairy Plan* and the *Joint Transition Team Report*.

We note that the Joint Transition Team recommends restructuring of existing dairy industry bodies into one national organisation that would be responsible for policy, advocacy, R&D and marketing services.

In December last year, RSPCA Australia provided a submission into the review of the rural development corporation (RDC) system. Of key concern to RSPCA Australia is the suggestion that all RDCs should be permitted to directly engage in lobbying and advocacy activities designed to influence public policy by proposing to lift current restrictions on agri-political activity. From an animal welfare perspective, this could mean that RDCs would be able to use taxpayer funds to lobby against animal welfare reforms that are not only science based but also widely demanded by the community. To quote from our submission:

RSPCA Australia believes that RDC involvement in industry advocacy activities is highly inappropriate and risks undermining the otherwise legitimate role RDCs play in research, development and extension services.

It is important that research and development services of RDCs remain independent, and are seen to be independent, of agri-political activity including industry representative functions and lobbying or advocacy efforts designed to influence public policy. Lifting restrictions on RDCs engaging in such activities would risk undermining the integrity and credibility of RDC research agenda and output as it could be seen to be agenda-driven.

The fact is RDC policy research and knowledge development is currently used to contribute to the public policy debates. The research and knowledge base is presented to industry representative bodies who then use it to promote their industry's interests and priorities. This is an appropriate separation of functions. If RDCs were to start engaging in these advocacy and lobbying activities directly it would raise questions over their objectivity and impartiality and whether it was appropriate that they continue receiving public funds. Under such a model, RDCs would effectively cease to be research and development organisations and would risk becoming advocacy-driven organisations.

As a general principle, taxpayer funds should not be utilised for industry lobbying and advocacy priorities as some of these priorities may not be consistent with the broader public interest.

It would be extremely difficult, if not impossible, to ensure that RDCs did not engage in agri-political activity, if current restrictions on agri-political activity were lifted.

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To maintain the integrity of the RDC system's role in producing quality research, development and extension outcomes, RDCs must maintain their independence from agri-political activity. If this separation in function is removed, many organisations from the animal welfare, environmental, health and other sectors may begin questioning the allocation of public funds to the RDC system.

Given the above, we have concerns about the integration of an advocacy role within the proposed one national dairy organisation. We note that the Joint Transition Team recommend the national organisation don't get involved in agri-political activity as defined in their report (p15), i.e. exerting influence to advantage one political party over another. However, their report also highlights the role of the new organisation in advocating the industry's strategic policy position(s) to government, stakeholders and the public. This is precisely the type of activity - i.e. influencing public policy - referred to in our submission above and which, we believe, should not be supported with taxpayer funds.

With regard to the *Draft Australian Dairy Plan* and, in particular, Commitment 3, we support the need to enhance consumer trust and confidence in the production of dairy products. However, this requires more than increasing "the scale and effectiveness" of "marketing and promotion". This requires genuine and on-going industry-wide commitment to address the animal welfare challenges faced by the industry and strive towards continuous improvement on farm as well as during transport, at saleyards, and at slaughter. The *Australian Dairy Sustainability Framework* should continue to be seen as a mechanism to identify emerging issues and report publicly on progress made towards implementing industry-wide change.

With regard to the role of research, development and extension in the dairy industry, it is widely acknowledged that this is important to the long-term viability of the sector. Improving animal welfare must be a priority in industry research programs. Peer review and publication of research results will ensure transparency and accountability, particularly where the research has involved expenditure of taxpayer funds. What is also required is improved communication of the research, development and extension activities in progress and completed, as well as publicly available information outlining the results of the research and the degree to which extension activities have led to adoption by those who are intended to benefit from the research (i.e. tell the story about the tangible benefits). Greater transparency will lead to greater interest and potentially greater investment, including from non-government and non-industry sources of funding, which, in turn, will contribute to the sustainability of the dairy sector as a whole. With continued decline in state government extension activities, the proposed national dairy organisation may increasingly take on the role of extension provider - an activity that needs to be taken into account in the project funding and development phase.

RSPCA Australia encourages the dairy industry to continue to engage and consult with a wide range of stakeholders in the development and review of priorities particularly when it comes to the key asset underpinning the industry - the animals themselves.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Mussell'.

Richard Mussell
Chief Executive Officer
RSPCA Australia