



Submission to the Invasive Species Team,  
Department of Climate Change, Energy, the  
Environment and Water

*Re. Draft threat abatement plan for competition and land  
degradation by unmanaged goats*

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## About AMIC

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The Australian Meat Industry Council (AMIC) thanks the Department of Climate Change, Energy, the Environment and Water (DCCEEW) for this opportunity to partake in the public consultation process on the draft Threat Abatement Plan (TAP) for competition and land degradation by unmanaged goats.

AMIC holds strong concerns with the current plan, particularly: its lack of recognition of the economic and social role rangeland goats play in underpinning rural communities and employment; the unintended food safety and market access implications of some actions listed; and the limited acknowledgement of commercial operators in controlling goat numbers as seasonal conditions and goat populations change.

AMIC is the peak industry body representing the post farm-gate meat industry. Our members include red meat processors for domestic and export consumption, smallgoods manufacturers, wholesalers and distributors, through to independent retail butchers.

The red meat sector is worth \$22.5 billion per year to the Australian economy and (directly and indirectly) employs approximately 433,000 people across Australia<sup>1</sup>. The goat industry plays an important and growing role in the wider red meat sector and is the economic lifeblood of some regional communities.

This submission seeks to assist DCCEEW and the wider community in understanding the potential flow on impacts this draft TAP may have on the Australian goat meat industry, the people it employs, the markets it services, and the communities it supports.

AMIC welcomes the opportunity to further clarify any points made throughout this submission directly DCCEEW to ensure industry's concerns are addressed.

## **Key Points**

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AMIC wishes to emphasise the following concerns with regards to the draft Threat Abatement Plan (TAP) for competition and land degradation by unmanaged goats:

### **1. The Economic Importance of Australia's Goat Meat Industry**

The Australian goatmeat industry underpins the economies and social fabric of remote communities and provides an important source of nutrition to consumers domestically and overseas. Australia is the leading exporter of goat meat globally, with exports totalling \$225 million in 2022-23. Much of the value generated from exports flows directly back to remote communities. In semi-arid regions of Australia, alternative agricultural enterprises – such as sheep, cattle or cropping – are not as profitable as harvested rangeland goats or in some cases simply not viable. Actions within the TAP are antagonistic towards, or simply fail to recognise, the importance of the commercial goat industry, particularly the importance of harvested rangeland goats. Rangeland goats account for the vast majority (<90%) of goatmeat production in Australia. Aside from boosting regional economies, the value generated by rangeland goats plays an important role in financing landholder property maintenance, and investments into initiatives that protect the environment and biodiversity. This role is not adequately recognised or considered in the draft TAP and must be addressed.

### **2. Food Safety and Market Access Implications Arising from the Draft TAP**

The TAP fails to adequately consider the food safety and market access implications of the proposed actions. The TAP must be informed by a more holistic understanding of the goat meat and export industries. Of note, definitions of the term 'rangeland' within the TAP must align with existing commercial definitions to ensure the eligibility of Australian goat meat into high value export markets is not compromised. Moreover, actions to cull goats with baits or poison present food safety and residue risks, inhibiting the Commonwealth Government's ability to certify product for export – an issue which has evidently been overlooked. The TAP demonstrates a lack of understanding and consideration for the complexity and sensitivity of export food supply chains. Industry and government stakeholders must be consulted ahead of any investigation into controlled culling methods, including via purpose-built forums such as SAFEMEAT and the Export Meat Industry Advisory Committee (EMIAC) Food Safety

and Animal Health Sub-Committee (FSAHSC), to ensure there are no unacceptable risks to food safety or market access, or breaches of importing country requirements. Furthermore, the use of baits to control goat numbers must be strictly limited to isolated regions, such as islands, where guarantees can be made that there is no risk for baited goats inadvertently entering the food chain. Controlled culling is also highly likely to be viewed as wasteful and unsustainable by consumers, and may ultimately and unjustly result in damage to the reputation of Australia's goat meat industry itself. This has been realised in other animal management programs, such as for kangaroos, where culling has been conflated with wild harvest and utilised as a tool to undermine trade and consumption of these important proteins.

### **3. The Central Role of Commercial Operators in Managing Rangeland Goat Populations**

The harvested rangeland goat industry and associated commercial operators (landholders, harvesters, transporters, and processors) play a key role in managing goat numbers and removing unmanaged goats from the environment. Harvested rangeland goat populations and locations change with seasonal conditions. The most effective way to match removal rates with fluctuating goat numbers is to ensure the viability of commercial operators and market-based pathways. Commercial operators must have confidence to invest in assets and their businesses in the long term. The TAP holds potential to reduce confidence in the harvested rangeland goat industry, thereby threatening the viability of commercial operators and the service they currently provide. The result will be decreased removal rates from the environment, and ballooning goat populations in subsequent years. The TAP should only apply to areas where commercial harvesting arrangements are not possible (e.g. remote islands), and these regions must be clearly defined and identified. Deficiencies outlined here must be addressed in the final TAP. Failure to do so will have unintended consequences on goat removal rates and risks alienating the goat meat industry – an industry which already plays a critical role in keeping goat numbers in check. Industry must be viewed as a key partner for any future measured attempts to mitigate the impact goats have on the environment.

The following information expands on these points with supporting detail to further contextualise industry's concerns and add weight to recommendations.

## **The Economic Importance of Australia's Goat Meat Industry**

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### **Rangeland Goat Production and Processing**

In FY23, Australia slaughtered over 2 million goats and produced upwards of 33,000 tonnes of goat meat. Approximately 90 per cent of Australia's annual production is known to be sourced from goats which fall under the definition of 'Harvested Rangeland', or –

*A goat that has been captured from a wild state, that has not been born as a result of a managed breeding program, and has not been subjected to any animal husbandry procedure of treatment.*

The rangeland goat is a composite breed which has become naturalised throughout Australia's rangelands and is an ideal low maintenance and low risk production animal for veterinary medicine stewardship and market access purposes. The health and wholesomeness of Australian rangeland goat meat is reliable and remains a key advantage in international markets. Processors have reported a strong demand for rangeland goat meat into the US market for the first half of FY24, and historically very little interest in purchasing product sourced from Australian farmed goats.

Harvested rangeland goats are predominantly located in regions where land is too marginal and seasonal to run alternative livestock or cropping enterprises. In remote areas where inputs are relatively expensive, low-cost rangeland goat enterprises are the most attractive or sole option available to producers. The TAP claims that goats can have a detrimental impact on primary production. However, in many areas where rangeland goats are harvested, they are themselves the primary or sole form of primary production.

In many instances, transitioning from harvesting rangeland goats to a managed goat enterprise, an action promoted in the TAP, is simply economically unviable and would only be compounded when operating under an environment of uncertainty created by the TAP. Additional investments into on-farm infrastructure and alternative management practices to shift from a harvested rangeland system to a managed goat enterprise would come at increased investment, financial risk and property indebtedness – which few pastoralists would view as a viable option.

### **Industry Investments into the Goat Industry**

While goat harvesting and processing capacity can expand and contract as seasonal conditions and goat populations change, the base infrastructure,

particularly the capital invested in processing facilities, requires a degree of certainty and policy stability to be sustainably maintained. If the TAP undermines confidence in the future of the sector, investment into harvesting will withdraw and be directed elsewhere, leading to contraction in the degree of commercial harvesting.

Landholders that rely on harvested rangeland goats for income will also be affected by measures outlined in the TAP. Importantly, goat income generates cashflow which many landholders invest back into land management practices, such as the control of invasive pest and weed species and fencing for restoration of riparian zones. If the TAP impacts cashflow for these landholders, investment into land management practices which positively contribute to biodiversity in those regions is likely to be reduced.

### **The Australian Goat Industry is a major employer**

Goat meat processing employs thousands of people across predominantly rural and regional areas of NSW, Victoria, Queensland, South Australia, Western Australia, and Tasmania. On top of providing employment options within the regions, processing income acts as a major economic driver to the wider local community, generating further employment opportunities and community support through sponsorship of local community organisations, sports teams, and engagement with local small businesses throughout the supply chain.

Goats are often processed at mixed species processing establishments, which also process lamb, mutton and/or beef. Some of these establishments represent the largest employer within a region<sup>2</sup>. Goats play an important role in keeping these mixed species facilities running and people employed, particularly during periods of low livestock supply.

A reduction in the throughput of goats at processing establishments, due to diminished harvested rangeland goat populations as a direct result of the TAP, would impact employment opportunities within Australia's regional communities. AMIC wishes to emphasise the potential that this TAP, as currently drafted, holds in undermining not only the economy, but the vitality of many regional communities in which these goat processing establishments operate.

### **Australia is the world leading exporter of goat meat**

There is low, albeit growing, demand for goat meat domestically. Over 90 per cent of Australia's goat meat production is exported. The value of

Australian goat meat exports has almost doubled over the last decade and in FY23 totalled A\$225 million.

Australia has a long and successful history of exporting high quality goatmeat, compliant with stringent importing country requirements and Australian standards, to numerous markets around the world, including the US, Korea, China, Taiwan, Trinidad & Tobago and Canada. Australia's ability to produce large volumes of goat meat, processed under rigorous quality assurance systems, has made it the leading supplier of goat meat to the global market.

Other major exporters of goatmeat, such as those from Africa, cannot match Australia's animal disease status, hygiene credentials and subsequent level of export market access. Hence, if Australia's ability to produce, process and export goatmeat was undermined, not only would it impact Australian businesses and employment, it would also hurt our customers overseas and damage our international reputation as a reliable supplier of food.

The TAP implementation committee must be tasked with considering the economic, social and trade impacts, in addition to environmental, when reviewing any control measures.

### **Food Safety and Market Access Implications Arising from the Draft TAP**

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Australia has built a reputation over many years as the leading supplier of goatmeat globally, based on a first-class animal health status and high production and processing standards. Australia's export market access for harvested rangeland goatmeat is predicated on it being a low-risk product.

The TAP's promotion of baits to control goats presents a substantial risk to market access. The use of baits to control goat numbers must be strictly limited to isolated regions, such as islands, where guarantees can be made that there is no ability for baited goats to inadvertently enter the food chain. Importantly, the approval and use of baits must be done in a consultative way, which includes industry and government stakeholders via forums such as SAFEMEAT<sup>3</sup>, to ensure there is no unacceptable risk to food safety or market access or breach of importing country requirements.

To process and export meat requires adherence to a raft of requirements, including legislative frameworks and Australian Standards (see Table 1). Compliance against mandatory requirements for export is verified by the Australian Government Department of Agriculture, Fisheries and Forestry



(DAFF). Increased risks associated to product safety and wholesomeness within the supply chain may impact the ability and complexity by which DAFF can provide verification for export.

**Table 1.** Legislative and Regulatory Requirements for Australian goat meat export

<b>Export Control (Meat and Meat Products) Rules 2021</b>
<i>Goat meat is required to comply with the rules, to ensure that meat intended for export for food is: wholesome; meets importing country requirements; has an accurate trade description; and, is traceable and can be recalled if required. This includes the operational hygiene requirements, halal certification, and auditing requirements for export facilities.</i>
<b>The Australian standard for the hygienic production and transportation of meat and meat products for human consumption (AS 4696:2023)</b>
<i>Goat meat processors must comply with all the usual requirements to ensure a hygienic product, just as with the production of other products, such meat such as lamb and beef. The standard does includes specific requirements for goats (combined with sheep) regarding Post Mortem inspection of carcasses.</i>
<b>Approved Arrangements</b>
<i>Under the Export Control (Meat and Meat Products) Order, each exporter must develop, implement, and maintain an Approved Arrangement. These must address the requirements of AS4696. Goat meat exporters must comply with all standard requirements. The Approved Arrangement provides specific details on how exporters will comply including Process Control through Good Hygienic Practices and Hazard Analysis and Critical Control Points, and Product Integrity and Certification Requirements, including raising claims.</i>
<b>Prescribed Goods</b>
<i>Export commodities controlled by DAWE are listed or 'prescribed' in the <a href="#">Export Control Act 1982</a> and related legislation. Goat meat is currently listed as a prescribed good, and therefore must comply with the detailed requirements under the Export Control Act.</i>

Furthermore, Australia’s definition of harvested rangeland goats and the subsequent assurance programs that have been built around the harvested rangeland goat, underpin an exporter’s ability to demonstrate compliance when making certain raising claims, as well as DAFF’s confidence in certifying product which carries those claims for export. This is particularly vital in demonstrating product eligibility to access higher value and in-demand markets, such as USDA “free roaming”. Australian goatmeat exporters have invested considerably in process and quality assurance system development to ensure Australian goats are eligible for these differing markets, thereby diversifying the industry and creating on-going value from what would otherwise be considered a “pest”. Utilising language which depicts certain populations of unmanaged goats as feral throughout the TAP undermines industry’s long standing rangeland terminology. This poses significant risk to Australia’s ongoing access into the US free roaming market.

As Australia has demonstrated a clear ability to harvest rangeland goats for human consumption, efforts to cull goat numbers may be viewed

domestically and internationally as wasteful. The resources that goats have utilised, including their carbon emissions, would not be transferred into a product of value if simply culled, undermining Australia's reputation as a sustainable producer of food. In addition, the reputation of industry may be tarnished by controlled culling activities, if differentiation between wild harvest and controlled culling is not clear. This has been realised in other animal management programs, in particular for kangaroo, where culling has been conflated with harvest and undermined trade and consumption of these important proteins.

In addition, culling is at odds with industry and government goals to expand agricultural production, such as the National Farmers Federation's goal of a \$100 billion Agricultural Sector by 2030<sup>4</sup>, the Queensland Government's strategy to expand the sheep and goat industry<sup>5</sup>, or NSW DPI investments to increase the productivity of the goat flock<sup>6</sup>. Culling goats is also at odds with recommendations from the recent House of Representatives Inquiry into food security in Australia which recommended the development of "a specific strategy for expanding innovation and value adding in food production, with a view to enhancing commercial opportunities for Australian industry and enhancing food security."<sup>7</sup>

The full consideration of broad-reaching implications on food safety and market access due to actions outlined in the TAP is clearly lacking and requires further consideration.

### **The Central Role of Commercial Operators in Managing Rangeland Goat Populations**

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Goat culling activities under the TAP should be only applicable to islands, peninsulas and isolated patches of habitat where there is low risk of re-colonisation and where goats are not accessible for management via commercial harvesting arrangements. The culling of goats in rangeland harvesting regions will have a negative economic and social impact, due to interference with existing commercial arrangements and wastage of high value livestock that could otherwise enter markets for human consumption.

Commercial harvesting of rangeland goats can be a highly effective means of reducing numbers following wet periods and a build-up in inventories. If the TAP undermines this business model in the short-term, this commercial function which provides a wider environmental service may reduce or cease entirely in the medium to long-term.

This could subsequently mean that up to 2 million goats, as processed in FY23, are not being withdrawn each year from the environment via commercial pathways. As complete eradication of goats from Australia's rangelands is extremely unlikely, the withdrawal of commercial harvested goat supply chains could place significant pressure on public resources to control goat populations and cause even greater environmental damage.

Culling may be suitable on the 25 islands within the Great Barrier Reef World Heritage area with known established goat populations, as they are unlikely to be able to access commercial supply chains and there is a reasonable chance they can be eradicated. Beyond these islands, and potentially other equally remote locations, a high threshold, which weighs the full costs and risks to the commercial industry, must be maintained before any culling occurs.

Simply identifying that goats can negatively impact some native flora or fauna should not be sufficient to commence culling activities. A much more holistic and informed decision-making process, with input from industry, must be adopted and be incorporated into the TAP.

## **Conclusion**

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AMIC does not support the proposed draft TAP in its current format. Actions proposed by the TAP have potential to cause reputational and economic damage to businesses that rely on the supply of rangeland goats, and may lead to an inadvertent increase in goat populations across rangeland areas of Australia. A much more holistic, informed, and consultative decision-making process must be detailed prior to finalisation of the document.

There is opportunity for the draft to be reviewed and provisions amended to ensure the continued growth of Australia's goat meat industry is supported rather than jeopardised. AMIC proposes that the draft TAP be reviewed to holistically consider the implications of the plan on the harvested rangeland goat industry, the people it employs, the markets it services, the communities it supports, the global image of Australian goat meat and the industry's contribution to unmanaged goat removal throughout rangeland areas of Australia.

AMIC supports the application of some appropriate control measures outlined in the TAP on islands, peninsulas and isolated areas of habitat where there is low risk of re-colonisation and no existing commercial pathways. Baiting must be restricted to geographically isolated areas to ensure there is no risk to the food supply chain. Within other regions,

commercial operators in the harvested rangeland goat industry play a critical role in the control of unmanaged goats and should be considered by DCCEEW as a key partner in management of goat populations moving forward.

AMIC welcomes the opportunity to clarify any points made throughout this submission and to further engage DCCEEW in follow up consultation to ensure industry's concerns can be addressed.

ENDS

## References

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<sup>1</sup> <https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/trends--analysis/soti-report/mla-state-of-the-industry-report-2023-web.pdf>

<sup>2</sup> <https://www.moretoeat.com.au/campaign>

<sup>3</sup> <https://www.safemeat.com.au/>

<sup>4</sup> [https://nff.org.au/wp-content/uploads/2020/02/NFF\\_Roadmap\\_2030\\_FINAL.pdf](https://nff.org.au/wp-content/uploads/2020/02/NFF_Roadmap_2030_FINAL.pdf)

<sup>5</sup> [https://www.daf.qld.gov.au/\\_data/assets/pdf\\_file/0003/1580664/queenslands-sheep-goat-meat-strategy.pdf](https://www.daf.qld.gov.au/_data/assets/pdf_file/0003/1580664/queenslands-sheep-goat-meat-strategy.pdf)

<sup>6</sup> [https://www.dpi.nsw.gov.au/about-us/media-centre/releases/2023/general2/new-\\$3.7-million-project-set-to-revolutionise-goat-industry](https://www.dpi.nsw.gov.au/about-us/media-centre/releases/2023/general2/new-$3.7-million-project-set-to-revolutionise-goat-industry)

<sup>7</sup>

[https://parlinfo.aph.gov.au/parlInfo/download/committees/reportrep/RB000221/toc\\_pdf/AustralianFoodStoryFeedingtheNationandBeyond.pdf](https://parlinfo.aph.gov.au/parlInfo/download/committees/reportrep/RB000221/toc_pdf/AustralianFoodStoryFeedingtheNationandBeyond.pdf)