

Dougal Gordon  
Group Director, Livestock Systems  
Department of Primary Industries and Regional Development  
105 Prince St, Orange  
NSW 2800

[dougal.gordon@dpi.nsw.gov.au](mailto:dougal.gordon@dpi.nsw.gov.au)

20 May 2025



## Proposed improvements to NLIS tagging requirements at abattoirs

Dear Dougal,

I'm writing on behalf of the Australian Meat Industry Council (AMIC) regarding a regulatory and operational issue affecting sheep and goat processors in NSW, specifically how untagged or incorrectly tagged animals are managed at abattoirs under the current livestock identification requirements.

Under the Biosecurity (National Livestock Identification System) Regulation 2017, abattoirs must ensure that all sheep and goats are properly identified with an NLIS-approved device. In cases where animals arrive without a tag or with an incorrect one, processors are required to apply a special (emergency) NLIS tag before the animals can be processed. This requirement is creating operational issues for our members and is not consistent across jurisdictions.

AMIC members have identified ongoing challenges with this procedure, including handling delays, increased labour demands, tag waste, and animal welfare concerns. These impacts are particularly evident in high-volume abattoirs and can affect overall processing efficiency.

AMIC fully supports the need for a robust identification system that enables effective traceability for disease control, food safety, and market access. However, we note that the current approach in NSW does not enhance traceability outcomes and differs from other jurisdictions. In Victoria, for example, untagged animals may be processed without applying an emergency tag, provided their origin can be verified and appropriate records are maintained. This approach offers a traceability-compliant alternative that reduces unnecessary handling and operational disruptions at abattoirs.

To address the challenges faced by processors in NSW while continuing to meet traceability requirements, AMIC recommends two complementary actions:

1. Adoption of a virtual tag. This would allow abattoirs to electronically record untagged animals in NLIS without using a physical emergency tag. The virtual tag would be limited to use at the abattoir and is intended to preserve full

traceability while reducing unnecessary handling, improving processing efficiency, minimising tag waste, and supporting better animal welfare outcomes. AMIC has consulted on this proposal with jurisdictions, including NSW, through the Sheep and Goat Traceability Task Force (SGTTF), and intends to present it formally to ISC for consideration.

2. Amendment to the Biosecurity (National Livestock Identification System) Regulation 2017. Current NSW legislated procedures require abattoir operators to ensure all stock is properly identified, which in practice means applying special (emergency) NLIS tags to animals that arrive untagged or incorrectly tagged. AMIC recommends amending this provision to allow the processing of such animals without applying a special tag when their origin is known and verifiable through appropriate documentation. This change would further reduce handling, improve operational efficiency, and ease regulatory burden on abattoirs while continuing to uphold traceability outcomes.

We appreciate the constructive engagement DPI NSW has provided so far and look forward to working together on a practical, nationally consistent outcome.

If you would like to discuss this matter further or arrange a meeting, please contact Sue Viana, Manager – Animal Welfare & Integrity Systems, at [sviana@amic.org.au](mailto:sviana@amic.org.au).

Yours sincerely,

Tim Ryan  
CEO  
Australian Meat Industry Council