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Submitted online: [https://haveyoursay.agriculture.gov.au/review-asel/survey\\_tools/online-submission-3](https://haveyoursay.agriculture.gov.au/review-asel/survey_tools/online-submission-3)

*Animals Australia's Submission to the  
Review of the Australian Standards for the Export of Livestock:  
**Response to the Stage 2: Draft report** (incorporating the reformatted ASEL  
of 30/10/2018), by the Technical Advisory Committee*

Animals Australia appreciates the opportunity to provide a response to the Stage 2 Draft Report and reformatted Australian Standards for the Export of Livestock (ASEL). As you are aware, Animals Australia is a peak animal protection organisation which has been providing input on animal welfare aspects of Australia's live export industry for over three decades, and, as such, is a key stakeholder in the issues addressed in the Technical Advisory Committee (TAC) report.

Previous detailed submissions provided by Animals Australia this year relating to ASEL; to the Australian Maritime Safety Authority (AMSA) shipboard facilities (Marine Orders 43) review; to the Moss Review; and to the Heat Stress Risk Assessment (HSRA) review, have each indicated the high risks to the welfare of animals during live export (and in importing countries), and the unnecessary and often extreme suffering caused to Australian animals.

The documentary evidence, animal welfare science, and our frequent observations have informed our strong and enduring view that there must be a total ban on live animal exports if the welfare of Australian animals is to be protected. However, until such time as a full ban is in place, we support the implementation of substantive and effective changes to the legislative regime governing live animal export (including the ASEL) in order to reduce the suffering of exported animals as much as possible.

Further, as we have submitted in our detailed response (19/10/2018) to the ASEL Stage 2 Issues paper, all sheep export should cease between May to October (inclusive), and this prohibition must be included in the new ASEL. This is a key and significant fault in the current TAC report.

We have not repeated here all the material provided in our Stage 2 Issues Paper of 19/10/2018, which relates to the areas covered by the TAC, on the expectation that the Department will refer back to that material for the rationale and references relied upon in our responses.

Hereby we provide the following responses to the recommendations made in the TAC 'Stage 2: Draft Report' which was released on 31/10/2018. For convenience, our responses are provided in a table below, addressing each recommendation individually.

No	TAC Recommendations (31/10)	Animals Australia response
1.	<p>That the standards prevent <i>Bos taurus</i> cattle from an area of Australia south of latitude 26° south being sourced for export on voyages that will cross the equator between 1 May to 31 October (inclusive), unless an agreed livestock heat stress risk assessment indicates the risk is manageable.</p> <p><i>[Note: if Recommendation 23 is accepted, this specific provision would not be required, as the heat stress risk assessment requirement would apply for these and all other voyages.]</i></p>	<p><i>Bos taurus</i> cattle from southern Australia <u>must not</u> be sourced for export for any voyages that will cross equatorial waters at <u>any time</u> of the year. These cattle are not genetically or geographically/climatically adapted to cope with the heat and humidity of equatorial waters (which experience these conditions all year) or northern hemisphere summer conditions (May to October).</p> <p>Please see our submission of 19/10/2018 at point 5.1 and 8.2 for details and references.</p>
2.	<p>That the standards prevent pregnant <i>Bos taurus</i> cattle being sourced for export on voyages that cross the equator from 1 May to 31 October (inclusive).</p>	<p>Agreed. In addition, see above: these cattle should not be exported at all as they will have to experience equatorial climatic conditions (to which they are manifestly unsuited) at any/all times of the year if exported.</p>
3.	<p>That the standard prevent <i>Bos taurus</i> cattle with a body condition score of four (4) or more being sourced for export from, or exported through, any area of Australia north of latitude 26° south from 1 October to 31 December (inclusive).*</p> <p>* Note, new body condition scoring system for beef cattle goes from 0-5.</p>	<p>See above: <u>no</u> <i>Bos taurus</i> cattle should be sourced for export to the northern hemisphere (across the equator) at <u>any</u> time of the year.</p>
4.	<p>That the standards require that sheep to be exported by sea have no more than 25mm of wool, with hair sheep excluded from that requirement given their natural tolerance for heat and lack of information on the stresses associated with shearing those animals.</p>	<p>Accept that sheep have no more than 25mm of wool (as the current ASEL requires).</p> <p>However, we do <u>not</u> accept that <b>hair</b> sheep be excluded from this requirement. As we argued in the previous submission (19/10 at 5.2), whether it is long hair or long wool, the bulk affects actual space and creates an additional risk to heat stress suffering – particularly so if a faecal coat develops during the voyage. Onboard veterinarians (AAVs) have also observed that haired animals could not be adequately monitored for respiratory distress, ocular or nasal discharge indicative of disease, weight loss, bloat, hollow appearance (inanition), etc. due to excessive hair/wool length.</p>
5.	<p>That for sheep held in a paddock at the registered premises, the standard continue to require that they be 10 or more days off–shears when sourced.</p>	<p>Agreed.</p>
6.	<p>That for sheep held in sheds at the registered premises, the standard require they be given at least one ‘clear day’ between shearing and loading for export. (Note: refer</p>	<p>Such sheep must be given <u>more than a single clear day after shearing</u> and before loading onto vessels. Shearing is stressful, and adds to the accumulated stressful experiences of the sheep – transportation, loading and unloading, mixing with unfamiliar animals, new fodder and</p>

	<i>definition of 'clear day' at Recommendation 9).</i>	environment. Our 19/10 submission argued for three (3) clear days. In addition, this will allow any shearing injuries to be noticed and treated, if necessary, in the feedlot if further days are required (i.e. 3 clear days).
7.	That industry investigate potential to reduce leg cuts/injuries and infections by not shearing the distal legs, and accommodate in best practice arrangements for further monitoring.	This recommendation is understood given the adverse welfare effects of shearing injuries – however, AAVs have reported that if wool/hair is left on distal legs then faecal matter may accumulate leading to further health issues.
8.	That existing weight thresholds for cattle and buffalo be retained, but with outcomes for animals over 500kg monitored over the coming 12 months to assess whether the upper threshold weight should be reduced from 650kg, and whether an absolute upper weight limit is necessary.	The maximum weight for cattle <u>must be reduced (in the new ASEL) to 500kg</u> . Further monitoring is not required to determine the high risk to heavy cattle, as dozens of high mortality voyage reports over the past two decades have shown the problems posed. Injuries from decking become infected, leading to septicemia, and animals that 'go down' are often not able to rise if they are larger/older. Smothering also becomes a problem if they go down. Large cattle are also extremely difficult for the AAVs and stockmen to manage if they require sedation, or need to be moved due to injury or illness.
9.	That the term 'clear day' be defined in the standard as a full day (midnight to midnight) during which livestock are not subject to any feed or water curfew, and are not handled, treated (including shearing) or moved from their holding pens or paddocks.	Agreed.
10.	That the standards require sheep and goats to be held at the registered premises for five clear days, irrespective of the location and design of the registered premises, the time of year, or the length of the export voyage.	Scientific studies show this should be longer – e.g. 7 days. As referenced in the TAC report (the Barnes et al, 2018 study), not all sheep feed sufficiently – even by day 6, when 2% were still accessing feed for less than 15 minutes a day. At 5 clear days, industry reports suggested 5% are still not eating pellets sufficiently <sup>1</sup> .  Regardless of the time, <u>all</u> sheep that are then selected to be loaded must be assured of adequate consumption (using the techniques, including electronic and/or physical marking from the troughs, used in the research) to supplement pre-loading inspection.
11.	That the standards require all classes of cattle travelling on short and long haul voyages to be held at the registered premises for a minimum of two clear days, irrespective of the location of the premises and the number of loading/discharge ports on the voyage. Three clear days should be required for all classes of cattle travelling on extended long haul voyages.	<u>All</u> classes of cattle should be held in registered premises for a <b>minimum of three (3) 'clear days'</b> , to enable the cattle which may have travelled long distances without food to re-establish gut flora, and to also enable pre-loading inspectors to visually identify any shy feeders.  Access to feed other than the shipboard pellets should not be permitted during this time – unless similar fodder will also be freely available on the ship.

<sup>1</sup> See, for example, the summary contained in the LiveCorp Submission to the *Review of Australian Standards for the Export of Livestock (ASEL) Stage 1*, page 12, available at: <http://www.agriculture.gov.au/SiteCollectionDocuments/animal/lac/asel/livecorp.pdf>.

12.	That the standards require buffalo to be held at the registered premises for a minimum of five clear days, irrespective of location of the premises, length of intended voyage or number of loading/discharge ports.	Agreed.
13.	That the standards require that, of the five clear days for which sheep and goats are held at the registered premises (refer Recommendation 10), they are fed <i>ad libitum</i> on pelletised feed equivalent to the shipboard ration for at least the final three clear days. ( <i>Note: refer definition of 'clear day' at Recommendation 9</i> ).	Sheep should be fed <u>only</u> the shipboard pellet food for those days to ensure shy feeders can be more easily identified (i.e. seen to be hollow); otherwise some may continue to eat only the other food, and not commence eating the pellets prior to loading.
14.	That the standards continue to require pelletised feed to be fed in troughs at the registered premises, and that feeders/troughs be of a design that prevents spoilage of feed, particularly during inclement weather. For sheep and goats held at registered premises in southern parts of Australia the standards should require they be fed from fully sheltered troughs, regardless of the time of year.	Agreed.
15.	That the existing pregnancy-related rejection criteria and pregnancy testing criteria be retained in the standards, other than: <ul style="list-style-type: none"> <li>a. the testing criteria relating to 'maximum days pregnant' for all livestock exported by sea, which should be amended to apply at the scheduled date of discharge, rather than the scheduled date of departure, to ensure that livestock cannot be exported in the third trimester; and</li> <li>b. the provision relating to Damara female sheep, which should be extended to apply to all female fat tailed sheep.</li> </ul>	Agreed – i.e. particularly that all female sheep/goats must be pregnancy tested.
16.	That the definition of a <i>competent pregnancy tester</i> be amended to cover persons permitted to undertake pregnancy testing by law in any state or territory jurisdiction, rather than just persons in the Northern Territory and Western	Given the high number of births taking place on board vessels, Animals Australia is of the view that pregnancy testing should only be undertaken by a veterinarian skilled in the practice of pregnancy testing. Further – any animals in the third trimester of pregnancy must be excluded from export.

	Australia. For clarity, the circumstances in which <i>competent pregnancy testers</i> are permitted remains unchanged.	
17.	That the standards allow the department to extend the validity of a pregnancy test beyond 30 days only where necessitated by circumstances outside the exporters control and where the exporter can demonstrate that the extension will not impact on animal welfare outcomes. That decision should be delegated to regional veterinarians, rather than requiring a formal dispensation from the Canberra office.	Limits should be placed on any departure from the 30 day window for pregnancy testing prior to export; i.e. tight criteria established, <u>including</u> a formal sign-off from the Canberra office.
18.	That the standards require that sheep and goats held at a registered premises for any period of time and in any group size be given a minimum space allocation of 0.5m <sup>2</sup> per head, with an additional 0.006m <sup>2</sup> for each 1kg increase in bodyweight above 54kg (as the threshold already specified in the standard).	It is understood that the proposal is generally somewhat larger than an allometric measure of k value 0.033. However, this is insufficient as this is merely the figure at which adverse risks to welfare are avoided (see Petherick et al, 2009); at this level not all sheep can lie and rest at the same time. As acknowledged in the TAC's consideration that high densities for animals that have just moved from free-ranging environments (such as in Australia) can be stressful. Newly mixed animals, too, will be hesitant to move to food and water if space is at a premium. To enable adequate movement, rest and other basic physical and social requirements, the appropriate applicable allometric k-value is <b>0.047</b> . This is the k-value that is required for all animals sharing a pen to be able to simultaneously rest in full recumbency – a clear requirement of sheep that have already been handled and transported, and must recover before export.
19.	That the standards for stocking density in registered premises remain unchanged for cattle and buffalo.	Agreed.
20.	That the standard adopt an allometric approach for calculating on-board stocking densities for sheep, with a k-value of 0.030 to be applied to the voyages during November to April, and a k-value of 0.033 for voyages during May to October.	Opposed: this is insufficient space for these long voyages – regardless of the time of year. (Note it is not clear why <u>0.030</u> has been stipulated here, rather than the previously stated (and insufficient) 0.033 k value). It appears to be a mid-way between the current ASEL density, estimated k value of 0.027, and the minimum k value 0.033. There is no scientific justification provided for this selection.  Regardless, a k value of 0.033 is rejected as it does not provide sufficient space for all sheep to lie fully recumbent (as opposed to merely sternal recumbency) simultaneously, or assure free access to feed and water troughs. 'Time sharing' rest space is unacceptable, as these animals are already enduring ship movement and, at such densities, would have difficulty resting if other sheep are needing to move around as they cannot all lie (i.e. disturbances).  <u>A k value of 0.047 is the minimum</u> that should be allowable on any shipments of sheep and, as indicated by the AVA and our own submission to the HSRA review, <u>no shipments</u>

		<u>should be permitted to leave during the months of May to October</u> each year due to the heat stress risk.
21.	That the standard adopt an allometric approach for calculating on-board stocking densities for cattle, with a k-value of 0.03. Where this approach determines a space allowance that is lower than the current ASEL requirement for a given liveweight and voyage, the higher space allowance will apply.	A further example of proposed inconsistent k values. It is not clear why this k value has been selected (i.e. k value 0.03, not 0.033)...
22.	That in relation to special categories of livestock, the following approach should apply to on-board stocking densities: <ul style="list-style-type: none"> <li>a. Buffalo: 10 per cent more space than required for cattle.</li> <li>b. Cattle and buffalo with horns: 30 per cent more space than otherwise required for cattle and buffalo without horns.</li> <li>c. Cattle and buffalo from 650kg and above: additional space allowance as determined by an approved heavy cattle/buffalo management plan.</li> <li>d. All pregnant cattle and buffalo: a minimum of 15 per cent more space than otherwise required for cattle and buffalo for a given liveweight and voyage.</li> <li>e. Rams and goats with horns: 10 per cent more space than otherwise required for sheep and goats.</li> </ul>	Buffalo have had significantly higher mortality rates. Further space increments should be provided and, in addition, an AAV should travel on <u>all</u> buffalo shipments to assess and assist these animals, who are clearly more stressed by transport/export and thus more vulnerable than cattle.
23.	That the standards be revised to require the application of an agreed heat stress risk assessment for all livestock voyages that cross the equator, at all times of the year, from all Australian ports.	Agreed that a HSRA is required <u>as a minimum</u> for any animals that are exported through equatorial waters. Furthermore, <u>no</u> animals should be exported across the equator from May to October each year (inclusive), due to the heat stress that is inevitable during the northern hemisphere summer months.
24.	That once the (separate) review of the heat stress risk assessment model is completed, the testing criteria in the standards should be revised to support the new model.	Agreed.
25.	That the period 1 May to 31 October continue to be applied as defining the 'northern summer' in the relevant sections of the revised standard.	Agreed.

26.	That the reportable mortality level for sheep and goats should be reduced to 1 per cent, or three animals, whichever is the greater; and that an <u>average daily mortality rate</u> of greater than 0.05 per cent be added to the list of events that would qualify as a 'notifiable incident'.	Agreed. However, <u>in addition</u> there should be a relationship with the 'average mortality' rate (for similar shipments – species, voyage length). In addition to reporting/investigation of any shipment mortality of 1% and over, each and every sheep shipment that records a mortality % that is higher than the average, for similar shipments over the past year, should be investigated in a similar manner.
27.	That the reportable mortality level for cattle and buffalo should be set at 0.5 per cent, or three animals, whichever is the greater; and that an <u>average daily mortality rate</u> of greater than 0.025 per cent be added to the list of events that would qualify as a 'notifiable incident'.	Agreed for long-haul voyages (10+ days), but to be consistent with other reportable mortality triggers, short-haul voyages of up to ten days should have a mortality trigger of 0.25%. Hence all reportable mortality levels are halved from current ASEL levels, and issues can be detected, investigated and addressed to reduce further suffering/deaths.
28.	That the requirements for daily reports and end of journey reports be updated as per Appendix A and Appendix B in this report including: <ul style="list-style-type: none"> <li>a. Inclusion of more detailed welfare monitoring in daily reports based on an assessment of at least 1–2 pens of sheep, cattle, buffalo and goats representative of each class or line, per deck, as well as a welfare assessment for any 'at high risk pens' or 'pens of concern'.</li> </ul>	Agreed – but more is needed. The sample pens should be chosen independent of exporters. In addition, the daily reports (not only the End of Voyage report) must include detailed information on any facility breakdown (ventilation, feeding, watering etc.), the timing, rectification and effect on animals. This will provide both AMSA and DAWR with crucial information on the reliability of shipboard systems. Further, average temperatures are totally inadequate to monitor conditions – wetbulb temperature should be taken and recorded at least 4 times/day on each deck, and detected highs and lows recorded. [N.B. the Independent Observer report 10, published on the DAWR site, indicated the inadequacy of average temperature recording on the Bahijah in June 2018]. Ammonia measurement must be measured at animal level in the pens on every deck and recorded each day, with highs noted (with a view to automatic recordings being introduced as soon as available). End of Voyage reports (by the AAV) should be published.
29.	That the standard require bedding management, including deck wash downs and replacement of bedding materials, to be sufficient to ensure good welfare outcomes for livestock, in particular, minimising slipping and abrasions, lameness, pugging and faecal coating.	Agreed.
30.	That the standard require the consistency and depth of bedding material to be routinely monitored.	Agreed.
31.	That the sheep manure pad continue to be used as the preferred bedding approach for sheep, but that the standards require a sufficient amount of sawdust, rice hulls or similar material be carried to manage moisture in the sheep manure pad, avoid slippage during loading and	Agreed. However, to adequately judge this over the next 12 months, a significantly increased reporting regime will be needed – direct monitoring of sample pens (including photos), and recording of outlier examples of pens' pad condition.

	unloading, and manage incidents such as pen flooding. The necessity and adequacy of the amounts carried should be tested over the next 12 months, with adjustments to this requirement made on the basis of evidence obtained through daily and end of voyage reporting.	
32.	That the standards require that cattle and buffalo on all voyages are provided with sufficient sawdust, rice hulls or similar material to be used for bedding at a minimum rate of 4 tonnes per 1000m <sup>2</sup> per application, with a minimum of 4 tonnes per 1000m <sup>2</sup> provided after each washdown.	Agreed. A voyage plan indicating the likely number of applications (washdowns) required, and thus the total amount of sawdust, rice hulls or similar, to be loaded per voyage. Previous voyage reporting should be used to verify the number/frequency of washdowns required. Ramps and alleyway areas must be included in calculations to ensure adequate footing during loading and discharge.
33.	That bedding requirements for extended long haul voyages be agreed in the long haul management plan.	Agreed.
34.	That once the variables affecting ammonia levels are better, and practical measurement devices are available (noting the current Livestock Export Program project underway), a requirement be inserted into the standards that: (i) ammonia levels in livestock spaces must not exceed 25ppm, and (ii) that ammonia reduction measures must be implemented if levels exceed 25ppm in any given area of a vessel.	Agreed, but see above: reporting on ammonia levels in all areas <u>at livestock height</u> must be introduced as soon as such monitoring is possible.
35.	That the standards require that all livestock be offered feed and water as soon as possible after being loaded on the vessel, and at the very least within 12 hours.	Agreed.
36.	That the standards require water to be provided <i>ad libitum</i> throughout the voyage (including days of loading and discharge). The standards should also prevent any water curfew prior to unloading in the northern hemisphere summer in Middle East ports.	Agreed, however the requirement to prevent a curfew (withdrawal) on water provision prior to unloading should not only occur during the northern hemisphere summer – <u>water should be available at all times on the ship</u> . Animals may be unable to drink during handling and transport after unloading, leading to extended deprivation due to trucking hold ups/availability, customs delays, etc. The length of deprivation of water (and fodder) must be mitigated by access on the ship, right up until unloading.
37.	That the standards require that for voyages of 30 days or less, at least 1 per cent of the fodder required for cattle must be chaff and/or hay. For voyages of 31 days or more, at least 2 per cent of the required fodder must be chaff and/or hay.	Agreed.
38.	That in relation to 3A.3.2, the 'anticipated needs of the animals'	Agreed.



	must include expected days of loading and discharge, rather than applying from the time of departure.	
39	That in relation to 3A.3.2, the statutory reserve should be increased to 4 days for all voyages longer than 10 days, regardless of species (while maintaining the current requirement for a 7 day fodder reserve for all voyages travelling through the Suez Canal).	<b>Not</b> agreed. The contingency for all voyages over 10 days should be sufficient fodder for an <u>extra 7 days</u> . The Department (then DA) advised in 2014 that, since the rejection of the Ocean Drover by Bahrain in late 2012 (and its subsequent elongated voyage to Pakistan), it was then requiring exporters to load seven (7) days extra fodder for sheep as a contingency. Even so, a voyage of the Ocean Drover from Fremantle to Israel and Jordan in January/February 2014 was extended due to mechanical breakdown, and fodder ran short due to initial ad lib feeding (similar to the Investigation Report 21 in 2007), and then due to the 33-day voyage. At least 1630 sheep (3.89 per cent) and 165 cattle died (2.75 per cent) on the Ocean Drover when different food had to be taken on (from Eritrea). 7 days extra fodder should therefore be the minimum requirement.
40.	That the standards are further reviewed without delay once current studies into fodder quality, quantity and pellet specifications are completed.	Agreed, in principle. However, a date must be written into the standards to require the review for, although research has been ongoing into this area for several decades, the standards have <i>not</i> been altered to reflect increased knowledge.
41	That the standards continue to require an <i>accredited stockperson</i> to accompany each consignment of livestock.	Agreed, in principle. However, <u>more than one accredited</u> stockperson is required to ensure the welfare of the animals, through skilled direction of crew and assistance to the AAV, on long-haul voyages and where the number of animals is high. The ratio suggested is <u>one accredited stockperson per 2,500 cattle and 10,000 sheep</u> (or part thereof).
42.	That the standards require one <i>competent stock handler</i> (as defined in the reformatted standards) per 3,000 (or part thereof) cattle and buffalo, and/or one per 30,000 (or part thereof) sheep. The standards should allow the accredited stockperson to count towards this requirement.	Agreed – with the competent stock handler/s required <u>in addition to</u> the number of accredited stockpersons as indicated in response to Recommendation 41.
43	That the standards require an AAV to accompany any export consignment where required by the department. Notwithstanding that, an AAV must accompany each consignment on long haul voyages, extended long haul voyages and voyages with pregnant livestock, unless otherwise agreed by the department.	This is insufficient. An AAV <u>must accompany every export voyage</u> , regardless of length. An AAV is required to oversee <u>all</u> management of animals, supervise, diagnose, treat and report on voyages.
44.	That the standard <u>not</u> allow the same person to be both the AAV and the accredited stockperson for any given voyage.	Agreed. As a minimum an AAV and an accredited stock person should be on every voyage. On long haul voyages, at least 2 AAVs should be onboard to share the workload (including monitoring at night), and further accredited stock people be carried as indicated at Recommendation 41.

**Table 18: Other amendments**

Issue	Current committee position	Animals Australia Response.
<b>Export of deer and camelids</b>	Remove specific requirements relating to the export of deer and camels by sea and replace a requirement for consignment specific management plans. The department will need appropriate expertise to assess these plans, with the requirements in ASEL v2.3 available as a reference point.	The export of deer and camelids provides even greater challenges as these animals are usually significantly less familiar with handling, and display further stress than other species (other than feral goats). They <u>must not</u> be exported at any time of the year.
<b>Export of goats</b>	Retain requirements in relation to the export of goats by sea, given that whilst exports are not occurring, they are technically possible under the terms outlined in Export Advisory Notice 2016–10.  Amend paragraph 1.A.1.1(b) to require that for export of goats by sea, a secondary inspection be conducted at the registered premises – excluding the day of arrival and final inspection prior to loading – to confirm that the goats have been held in the registered premises for five (5) days and fed appropriately.	The export of feral goats should be prohibited – past shipboard reports of higher mortalities is an indicator (albeit a blunt one) of the higher stress experienced by these wild and sensitive animals.
<b>Definitions</b>	Update definitions, including for pastoral and station sheep, and considering definitions used in the Australian Animal Welfare Standards and Guidelines.	Agreed.
<b>Body scoring</b>	Update as outlined in the Issues Paper.	Agreed.
<b>Onboard veterinary medicines</b>	Apply requirements in Table 10 to all cattle and buffalo exported by sea. Agree that Appendix F be updated following completion of the Livecorp project on shipboard drug use, which will have findings for broader veterinary requirements. In the interim, add the following requirements for pregnant cattle: <ul style="list-style-type: none"> <li>• 5 litres of obstetrical lubricant per 2000 [dairy?] cattle</li> <li>• Calving ropes (1 set per ship)</li> <li>• Obstetrical gloves (1 box per ship)</li> <li>• Oxytocin (50ml per 1000 cattle)</li> <li>• Additional chlorohexidine (or equivalent) of 5 litres per ship</li> <li>• 1 litre iodine per ship (umbilical testing)</li> <li>• Uterine pessaries (10 per 2000 cattle)</li> <li>• Surgical equipment adequate to conduct a caesarean section.</li> </ul>	Agreed.
<b>Minimum liveweights</b>	Increase the minimum liveweight of sheep and goats for export by sea to 32kg and 24kg respectively, to address higher mortality risk.	Agreed.

<b>Horn requirements</b>	<p>Require that horned cattle have the nonvascular tip removed to a diameter of 3cm.</p> <p>Retain the requirement that if horned, buffalo must have horns no longer than the spread of the ears. However, industry should quickly commission research to establish the impact of a longer horn for on board management of buffalo, including assessing the impact on access to feed and water. A more informed decision can then be made on horn length. In the meantime, producers and exporters must not implement inappropriate management practices to achieve a particular horn length and avoid a long horn management plan. De-horning should be conducted earlier.</p>	Agreed.
	Retain requirements for a long horn management plan.	Agreed.
<b>Sourcing sheep</b>	Remove references to sourcing through ports of Darwin, Weipa and Wyndham, and instead prohibit sourcing from all ports north of 26° south.	Agreed.
<b>Water engorgement</b>	Remove provisions relating to water engorgement.	Agreed.
<b>Land transport standards</b>	<p>Retain requirements in 2B.1(a) and (b) – aimed at minimising the amount of time for which access to feed and water is restricted.</p> <p>Retain curfew and rest requirements at set out in Appendix B – aimed at addressing cumulative stress of transport through the supply chain.</p>	Agreed.
<b>Extension of long haul voyage requirements</b>	Require that all sea voyages via the Suez Canal, the Cape of Good Hope, the Panama Canal and Cape Horn, as well as any other route where the voyage is expected to be longer than 30 days, have at least seven days reserve of additional fodder.	Agreed. (However, see our response to Recommendation 39: <u>all</u> shipments over 10 days should have 7 days extra fodder loaded.)

Thank you for the opportunity to provide the responses above.

If you require further information or clarification, please contact me directly at [googjes@animalsaustralia.org](mailto:googjes@animalsaustralia.org)

Yours sincerely,



Glenys Oogjes  
**Chief Executive Officer**