

While I provide comment below on the proposed ASEL Standards I make clear at the outset of this submission that I believe the complete lack of will to uphold statutory legislation by Littleproud and his predecessors, and the Department of Agriculture and Water Resources (the Department) means that live export is no longer a viable proposition and should be immediately banned.

**For years we've seen the continued failure of the live export industry to protect Australian animals from avoidable cruelty on board ships:**

- Animals subjected to cramped (sardine-packed) conditions
- Animals in filthy environments, bogged down in their own faeces
- Animals subjected to extreme heat exhaustion
- Animals in desperate need denied veterinary care/basic humanity
- Animals without clear access to food and water.
- Thousands of dead bodies flung overboard to pollute our oceans.

The proposed ASEL Standards seem to do little to improve the current and ongoing breaches of animal welfare – decent people all over the world find the cruelty of this Australian industry reprehensible.

I believe the standards proposed are not sufficient to address past deficiencies and animal welfare atrocities. However, if live export were to continue then I believe:

- Live export animal welfare requirements must also be clearly captured by criminal legislation with corresponding criminal penalties (including requisite minimum jail time for breaches of animal welfare requirements, which would apply to staff involved, company board members and directors in instances where animal welfare requirements are not met).
- Due to Littleproud and the Department's long-term failure to undertake their appointed duties, inability to manage conflicts of interest and general incompetence the Department should be replaced by a competent, independent and professional body capable of upholding Australian law.

Before commenting on the woefully inadequate ASEL Standards currently proposed I will state that I am appalled that anyone could find acceptable such abhorrent cruelty as has been evidenced in live export expose's by Animals Australia and 60 Minutes. The sort of cruelty involved seems like behaviour that only serial-killer-like personalities could be comfortable with continuing.

However, I am aware that submissions are being put forward by RSPCA Australia and the Australian Veterinary Association which are calling for changes to be made to the recommended Standards. Detailed evidence to support the RSPCA recommended changes listed below will be provided in their submission, which I reiterate that I believe does not go far enough, although I have listed them below.

## **Sourcing and preparation of animals**

- No animals should be exported during the high risk May-Oct period.
- The upper weight limit for all cattle being exported should be set at 500 kg, not at 650 kg, with no exemptions.
- Sheep must be rested for at least two days after shearing and prior to loading, to overcome cumulative stress of road transport, handling and shearing and ensure all shearing wounds are healed.
- No sheep, whatever the breed, should be allowed on board a ship with more than 25mm of wool or hair.

## **Space allowance for sheep and cattle**

The space allowances proposed in the draft Standards are still far too small and will force animals to 'time share' their space without the ability to lie down comfortably at the same time and easily access feed and water, whether they are in a registered premises or on-board ship.

## **Heat stress risk assessment (HSRA)**

The HSRA model should be applied to all voyages crossing the equator, at all times of year, from all ports.

## **Voyage reporting requirements**

In addition to RSPCA submissions I believe the reports should be made public, and penalties apply to staff and company directors if reporting requirements are not met, or are fraudulently tampered with.

## **Onboard management of Ammonia levels**

**Onboard personnel** - increased numbers of accredited stock persons per head of cattle or sheep and a qualified Australian Government Accredited Veterinarian (AAV) are on board every live export voyage

In addition, to the RSPCA recommendations I believe that such vets should be subject to life time banning by relevant State Veterinary Boards if they fail in their duty to ensure the well-being of animals under their care.

## **Species that should not be permitted to be exported:**

My view is no species should be subject to live export ever again. However I am aware the RSPCA has made the following recommendations:

- Live export of sheep to the Middle East during the May to October high risk period must cease immediately.
- The live export of feral buffalo should be prohibited, as they are unused to human contact and clearly do not tolerate handling and transport without serious welfare compromise.
- The export of feral goats, camels and deer should be prohibited, based on previous extreme mortality events and serious concerns over the handling and care of these species.

I feel there is shame on everyone involved in ignoring community expectations and significant animal welfare concerns in this review of the live export trade.

In particular, shame on all those politicians, government employees, businesses, company directors and staff involved in, and perpetuating, such abhorrent criminal behaviour. You are a source of disgust to decent people.

Yours sincerely,  
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