

26 November 2018

Submission to the Review of the Australian Standards for the Export of Livestock (ASEL)

Dear Committee Members,

This year, we have yet again seen the failure of the live export industry to protect Australian animals from abject cruelty on board ships. We've seen animals subjected to cramped, filthy environments, bogged down in their own faeces and without clear access to food and water.

The proposed ASEL Standards must do better for animal welfare - Australians will not stand for the cruelty of this industry to continue unchecked, and I'm writing to you to voice my concerns and my expectations for animal welfare within the new standards.

I am concerned that profitability and commercial expediency has for too long been placed above the welfare of animals. They are not just cargo - they are sentient individuals that feel pain, fear and discomfort and the need for this to be better recognised within the ASEL motivates me to make this submission.

Whenever any animal is subjected to live export from Australia by sea, it is my expectation their treatment and conditions will meet evidence-based animal welfare standards to protect them from harm.

Although the recommendations put forward in the ASEL Review Draft Report go some way towards this, my submission is that further changes are needed to bring these standards up to scratch, as I have outlined below. Detailed evidence to support these changes is provided in the submissions put forward by RSPCA Australia and the Australian Veterinary Association.

Sourcing and preparation of animals

- I support the recommendation to prohibit the export of pregnant *Bos taurus* cattle during the high risk May to October period. However, the risks are too great to allow cattle of any class to be exported from southern ports across the equator at this time.
- As the body mass of adult cattle increases, so does the risk of injury and susceptibility to heat stress during export. To mitigate this risk, evidence shows that the upper weight limit for all cattle should be set at 500kg, not at 650kg, with no exemptions.
- I agree with the committee's conclusion that sheep need time to rest and recover from shearing before they are loaded onto the vessel. But one clear day is not enough - sheep need at least two clear days to overcome the cumulative stress of road transport, handling and shearing and to ensure all shearing wounds are healed before loading.
- No sheep, whatever the breed, should be allowed on board a ship with more than 25mm of wool or hair. We have seen the devastating effects of sheep coated in slurry succumbing to heat stress; this includes hair sheep as well as Merinos and every possible step must be taken to avoid this from recurring.

Space allowance for sheep and cattle

- I support the recommendation that the ASEL adopt a science-based approach for calculating on-board stocking densities for sheep and cattle based on allometry.

However, the space provided must allow all animals 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. This is a basic, necessary requirement irrespective of other environment factors such as heat load, yet the current recommendations do not provide sufficient space to meet these needs.

- Sheep and cattle normally spend 60-80% of their time lying down, and do so at specific times of day to aid rumination as well as to rest. When given insufficient space, animals do not 'time share' lying time; instead, the less dominant individuals in the group are forced to spend more time standing up until they are too fatigued to do so.
- Preventing sheep and cattle from lying down whenever they need to do so is cruel. If you are to regain community support for the live export trade, I urge you to follow the RSPCA's recommendations when it comes to space allowances.

Heat stress risk assessment (HSRA)

- I support the recommendation that the HSRA model be applied to all voyages crossing the equator, at all times of year, from all ports.

Voyage reporting

- I support the recommendation to increase voyage reporting requirements to include more detailed daily welfare monitoring at the pen level, but the selection of pens must not be decided by exporters. Welfare monitoring must be accurate and transparent - there must be no opportunity for exporters to avoid reporting poor outcomes.
- Voyage reports should be made publicly available to demonstrate that exporters have nothing to hide.

Onboard management

- I am very concerned that no standard has been proposed to require corrective action to be taken when ammonia levels reach harmful levels. There is no need to wait for more research to implement this standard. Ammonia meters are widely available and used on farms and should be deployed during daily monitoring.

Onboard personnel

- I support the recommendation that the number of stock handlers should be in proportion to the number of animals loaded, but the requirement should be for least one accredited stockperson per 2,500 head of cattle and 10,000 head of sheep (not 3,000 cattle and 30,000 sheep), to allow effective monitoring of stock.
- Veterinary supervision is necessary on every live export voyage, no matter its duration. Only AAVs are trained to diagnose disease and other health problems and implement appropriate treatment. The standards should require an independently appointed AAV to accompany all live export consignments. All journeys should also include an independent auditor with ultimate responsibility for reporting requirements.

Species permitted to be exported

- **Sheep** - the evidence is clear that, regardless of any proposed changes the standards, sheep will suffer heat stress during voyages to the Middle East in the

May-October period. I urge you to ensure that the standards explicitly exclude the long-haul export of sheep during this period.

- **Feral buffalo** - the Draft Report indicates there are significant and serious animal welfare and mortality issues with the export of feral buffalo. It appears that these problems have gone unidentified and unaddressed because of the absence of any independent or veterinary oversight. Feral buffalo are completely unused to human contact and clearly do not tolerate handling and transport without serious welfare compromise. These problems carry over into importing countries to the point of slaughter. I urge you to amend the standards to prohibit the live export of feral buffalo.
- **Feral goats, camels and deer** - none of these species have been exported by sea in the past three years or more. Previous extreme mortality events have indicated that goats cope poorly at sea and similar concerns exist for deer and feral camels. There is insufficient expertise and infrastructure in the live export supply chain to manage these species at sea and such export is unnecessary when air transport is available as a safer cost-effective option. I urge you to amend the standards to prohibit the live export of feral goats, camels and deer.

Finally, it is my expectation that, on completion of this review process, the Australian Government will act to immediately implement the revised standards so that exported animals can benefit from any improvements to animal welfare as soon as possible.

As I highlighted earlier, animals are not just cargo, yet it is their deaths which ultimately provide the income that all those who are involved in this trade rely on. Surely then, it is not too much to ask that their welfare should be a priority and they should be treated with the utmost care and respect. This is clearly not currently the case and is why I would like the Technical Committee to consider this submission.

I will await the results of the review.

Kind regards,

Emily Cook