

ASEL Review - Technical Advisory Committee 2018

**Stage 2: draft report, Department of Agriculture and Water Resources,
Canberra**

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SUBMISSION

Thank you for the opportunity to make a submission. I am very disappointed with the draft recommendations; they will bring little comfort to the many people in the Australian community who are appalled by the cruelty inherent in the live trade. I have some preliminary points to make.

1. Productivity Commission 2016 report, Moss Review and need for community expectations to be met

The commission's November 2016 *Regulation of Agriculture* report states on page 22:

Standards and guidelines should be more evidence-based, drawing on the existing body of evidence on animal welfare science and research on community views of animal welfare... Surveys of community values for animal welfare should be statistically robust and transparent... It is critical that the community has confidence in the system used to regulate live exports.

Since my response to the Stage 2 Issues Paper in September this year, the Moss report has been made public. This report was scathing of DAWR, and concluded that the current (2011!!) ASEL do not meet community expectations. As a stakeholder – a member of the community - I wholeheartedly agree. Like the Productivity Commission, Mr Moss similarly reported:

The department needs to regulate live animal exports in accordance with the required standards, [and] community expectations ... The skills specifically required to regulate live animal exports effectively include expertise in production animal health and the science of animal welfare ... [to] enable it to respond effectively to current and emerging animal welfare concerns

Recommendation 8 of Mr Moss was important, because the animal welfare organisations speak for the community:

That the Department adopt a regulatory approach that recognises the contribution of animal welfare organisations in identifying non-compliance with the Australian Standards for the Export of Livestock, the Exporter Supply Chain Assurance System and animal welfare standards.

Recommendation 30 of Mr Moss:

That the department establish appropriate forums to consult with stakeholders and assess community expectations.

I am a very concerned member of the community these reports talk about. As I have previously submitted, I spent 20-plus years on our family dairy/beef farm. I thus have hands-on experience of farming practices. Some years ago some of our prime dairy heifers were exported live. I deeply regret that. I am one among hundreds of thousands of other members of the Australian community who want an end to live export. Minister Littleproud's

recent comment that those who want to end live export are 'ignorant and naïve' is impertinent.

After the Moss review became public, the ABC reported on 6 November 2018 that Minister Littleproud had asked a former head of the Australian Crime Commission, Mr John Lawler, to investigate DAWR. Mr Littleproud is reported as having said:

There are seven (staff) that have made allegations that they wished to bring forward evidence of wrongdoing by export companies but were advised by their senior officers not to raise them because there could be repercussions...

Like many in the community, I am very concerned about the allegations and lack of transparency, because sheep, cattle and other livestock are right now being exported and are in danger, and the 'senior officers' who are the subject of seven staff members' allegations are presumably still employed at DAWR.

In its considerations, ASEL must bear in mind the findings of the Moss report and these latest allegations, as well as the past atrocities and inaction since 2011.

I do not accept that the lapse in the ASEL review was due to a failure to reach agreement on issues. All issues can be negotiated and resolved – otherwise the world would stand still. On page 12, paragraph 69 the Moss review states:

The department further noted that the reason why the issues remained unresolved was the lack of research to support one view over the other.

Knowing research was lacking, DAWR had plenty of time between 2012 and 2018, to gather and analyse scientific research on the unresolved issues, especially given the ongoing high mortality rates and community concern during that time. And this TAC is still framing standards without the benefit of this peer-reviewed science, because many very relevant reviews are still works in progress. Practical knowledge and valuable on-the-job experience - like that of former long-haul live export vet, Lynn Simpson, (57 voyages) - must also be sought when framing these standards.

Use of technology on export ships

On page 76, Mr Moss states:

370. Investment in technology solutions would also facilitate the level of transparency that the AVA, animal welfare organisations, industry, producers and the public are seeking.

371. AMSA has indicated its willingness to work with the department and the live animal export industry to install monitoring devices on live export vessels, at exporters' expense. This initiative would reduce reliance on AAVS

and IOs to monitor on-board vessel issues such as heat, humidity and ammonia levels. It would also increase the prospect of greater transparency for stakeholders.

ASEL must immediately mandate automated on-board CCTV and real-time monitoring systems. No need for time-wasting reviews; this technology is commonplace in shipping these days.

2. Currently operating stocking densities have no scientific basis

The Moss report states:

186. An enhanced regulatory model would also draw on the scientific community and animal welfare experts to ensure that the standards of animal welfare [are] based on scientifically sound welfare standards. It is noted that changes in policy and regulations must be underpinned by science.

With live export ships doing business as usual, I have no confidence in DAWR's ad hoc setting of stocking densities. I refer to the evidence of DAWR's Assistant Secretary, Dr Narelle Clegg, in a Senate Estimates Committee on 24 May, 2018 where she admitted the 17.5% figure currently being used was not based on science. At page 120 the transcript states:

Senator RHIANNON: I was actually interested in how the 17.5 per cent figure was arrived at. Can you explain that, please?

Dr Clegg: The 17½ per cent figure was arrived at after the footage appeared on the network. The average increase we have normally applied to sheep export voyages after a mortality event has been in the order of 10 per cent. In some instances we've applied 15 per cent. Because of the severity of the symptoms that were shown on that ship we asked for more than 15 and arrived at 17½ per cent.

Senator RHIANNON: So, it wasn't so much on any scientific basis—

Dr Clegg: No.

Senator RHIANNON: but that it was so terrible. Okay. Thanks very much. Can you advise on how the new information in the form of the 395 video files was taken into account in assessing whether the travel arrangements were adequate for the animals' welfare? Is that what you're referring to—you saw all the terrible footage and then you went for 17.5?

Dr Clegg: Yes, we saw the footage and did a number of things. One was to apply a reduced stocking density on voyages for that exporter on other vessels that contain sheep

The ad hoc 17.5% stocking density that was applied from 1 November goes against AVA advice that live sheep exports to the Middle East should (a) be suspended between May and October and (b) that for the rest of the year the reduction in stocking density should be 28%.

3. Economics

The draft report says if exporters want to maintain current margins, sheep prices would have to fall \$15 to \$25 a head, depending on the time of the year. However, the report points out that farmers have other domestic options. I believe profit must never have precedence over animal welfare. Welfare must not be downgraded to ensure the ongoing viability of live export. I am concerned that if exporters have insurance, there is no incentive for them to reduce mortalities.

Increased welfare is the cost of doing business. The TAC must explore the concept of 'social licence'. I believe the live export trade has never had a social licence.

On the subject of economics, the Coalition Government says importing countries need our sheep. Well, Kuwait, the major buyer, wants our live sheep so that it can slaughter them, value add and on-sell to other Middle Eastern countries to compete side by side with Australian chilled exports in Middle Eastern supermarkets. That seems good economics for live exporters and Kuwait, but not for Australian farmers and our agricultural economics.

4. 'Matters for monitoring'

Under this heading the ASEL draft report states:

The committee recommends that the department establish a regular process for accommodating these and other changes. As noted in the section on voyage reporting, the committee also recommends an epidemiological approach to analysing data obtained through daily and end-of-voyage reports to identify changes that should be accommodated in the standards more generally.

I agree with continuous and ongoing improvement. I am concerned that vital welfare improvements are needed NOW, yet TAC is still waiting on the analysis of research, studies and data on pregnancy testing, stocking densities, HSRA, mortality rates, panting scores, bedding and fodder - all the very animal welfare issues about which the community has major concerns. Because of this, TAC must lean strongly on the side of higher welfare in all cases when amending these current standards, given the time the various reviews/studies will take and the atrocities that have occurred since the 2011 ASEL - and will no doubt continue if this draft is accepted in its current form.

It is a national disgrace that it has taken a never-ending series of shocking revelations about the live export trade over many years for DAWR to only now embark on scientific studies and start chasing up reviews.

5. Recommendations – my comments

I have read and endorse the responses to the Issues Paper from Animals Australia, Sentient, Vets Against Live Export, the RSPCA, the Australian

Veterinary Association, and Townsville Against Live Export. Between them, these organisations have considerable scientific knowledge and animal husbandry know-how as well as a keen interest in welfare issues in the live export industry. I confidently support, in advance, their responses to these draft recommendations.

The draft recommendations are listed below with my comments in blue.

1. That the standards prevent *Bos taurus* 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. Cattle must not be exported from southern ports across the equator during the high risk May to October period. Delete the conditional clause beginning ‘unless an agreed...’. I understand there have been two high mortality cattle voyages to China this year due to heat stress. The scientific reviews are in progress. The McCarthy HSRA is the subject of a separate review, and it has not been finalised. Cattle must not be exported between May and October until the science for all livestock has been received and examined. I note the current heat stress model is an industry-developed model that has not been independently validated, is not publicly available and has not been published in a peer-reviewed scientific journal. Therefore there is no transparency for the community. The current assessment model is for predicted mortality; it does not assess risk of livestock suffering or other welfare issues. When the HSRA is scientifically developed for all species it must be applied to all voyages crossing the equator, at all times of the year, from all ports.

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.]

2. That the standards prevent pregnant *Bos taurus* cattle being sourced for export on voyages that cross the equator from 1 May to 31 October (inclusive). Pregnant animals must not be exported. The testing is inadequate, evidenced by the number of births and pregnancy related procedures that occur on export ships. A ban on pregnant animals would prevent a lot of animal suffering, prevent low morale among staff, who often have to kill new borns and would lower exporters’ costs by not requiring veterinary equipment/drugs/workers’ time to deal with pregnancy issues.

3. That the standard prevent *Bos taurus* 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).*

* Note, new body condition scoring system for beef cattle goes from 0-5

4. 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. **The 25mm must apply to all sheep, including hair sheep. DAWR must not have discretion. Independent research must be undertaken into the stress associated with shearing hair sheep.**

5. 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. **Sheep must be 10 days or more off shears at the time they are sourced (on farm) for export. If shorn at registered premises, there must be a minimum mandatory period of 3 clear days off shears where sheep are shorn prior to loading (but after sourcing) and held at registered premises. (This is for recovery purposes and reducing their accumulated stress due to transport, shearing etc)**

6. 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 definition of 'clear day' at Recommendation 9)* **Must be greater than 3 days off shear, and, if weather is inclement, sheep must be kept in sheds for protection. This is to overcome the cumulative stress of road transport, handling and shearing, and to ensure all shearing wounds are healed.**

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.

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. **Cattle and buffalo over 500 kg must not be exported. Plenty of evidence of injuries to heavy cattle is available to demonstrate that 500 kg is too big and too risky. I agree with the AVA recommendation that cattle must weigh less than 380 kg to avoid lameness, lesions and complications, which are a major cause of mortality and morbidity on board ships. As well as weight, animals must be checked for condition, body score and fitness and individually inspected by a competent person during unloading, daily in registered premises and prior to loading on ship.**

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.

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. Sheep must be held for 7 clear days to ensure they are used to eating pellets. Shy feeders can be monitored and then eliminated from live export. Stocking densities at registered premises must be such that shy feeders can be easily identified (electronic monitoring). Scientific studies are urgently needed into the issue of shy feeders in feedlots prior to voyages.

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. [At least three clear days must be given to all live export cattle, regardless of voyage distance. See also my Recommendation 10 response.](#)

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. [Feral buffalo must not be exported.](#)

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 *ad libitum* on pelletised feed equivalent to the shipboard ration for at least the final three clear days. (*Note: refer definition of 'clear day' at Recommendation 9*). [I recommend that sheep and goats are held in registered premises for seven days. Sheep and goats must be fed the shipboard ration for the last four clear days. This is barely enough time for them to become used to the new food. See my response to Recommendation 10.](#)

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. [The AVA Issues Paper response flagged urgent need for adequate trough space, both in registered premises and on board ship. The phrase 'Southern parts of Australia' need to be more clearly defined.](#)

15. That the existing pregnancy-related rejection criteria and pregnancy testing criteria be retained in the standards, other than:

- 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
- b. the provision relating to Damara female sheep, which should be extended to apply to all female fat tailed sheep. [Pregnant animals must not be exported, because the ASEL standard is inadequate and far too many](#)

animals are born on ships and/or pregnant animals or new borns suffer. Testing must be done by registered and accredited veterinarians skilled in pregnancy testing. Goat kids and ewe lambs can conceive at less than five months of age. So the test standard must not be increased to those aged more than five months. Sheep and goats must be tested by trans. ab. ultrasound. Testing must be done by ultrasound only for small cattle and buffalo.

16. That the definition of a *competent pregnancy tester* 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 Australia. For clarity, the circumstances in which *competent pregnancy testers* are permitted remains unchanged. **Only skilled and accredited veterinarians must undertake pregnancy testing.**

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. **It is impossible for exporters to demonstrate that a time extension will not impact animal welfare. No. I do not support DAWR having discretion to make such changes, given the industry's and DAWR's dismal track record.**

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 0.5m² per head, with an additional 0.006m² for each 1kg increase in bodyweight above 54kg (as the threshold already specified in the standard). **This is not enough space. Stocking densities at registered premises must be lower to allow shy feeders and other problems associated with the animals' 'fitness to be exported' to be easily detected and the animals removed. Lowering densities at registered premises reduces the impact of the stresses of long-haul land transport and loading and unloading that contribute to inanition and salmonellosis in sheep. This stress can cause respiratory disease in cattle, which is a major cause of death in long haul voyages.**

I do not support DAWR having discretion to change stocking densities in the absence of science. They do not have the requisite skills to do so. All animals must have sufficient space to all lie down comfortably at the same time (i.e. recumbent) and to readily access food and water, regardless of whether they are in registered premises or on board ships. In all cases weights for all species must be confirmed by weighbridge averages during transit to ship.

19. That the standards for stocking density in registered premises remain unchanged for cattle and buffalo. **See recommendation 18 response above. Cattle and buffalo should have similarly reduced stocking densities.**

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. [Sheep must not be exported to the Middle East between May and October. In other cases, the allometric K-value must be 0.047 regardless of species and voyage length. This allows all animals sharing a pen to simultaneously rest fully recumbent. It also allows them to readily access food and water. The science \(Petherick & Phillips 2009\) says a k-value of 0.033 is the bare minimum. After all the knowledge we now have regarding voyages and animal suffering, the suggestion in the draft report of a range starting at 0.027 \(which does not allow all animals to lie down at the same time or readily access feed and water troughs\) was disappointing in the extreme.](#)

[It shows that the industry and DAWR are ignoring community concern about the suffering of livestock on live export ships. The current on-board space allowances do not conform to OIE recommendations and are less than similar Australian land standards. The OIE standards, to which the industry, government and DAWR purport to adhere, state that space allowance on a sea vessel 'should allow the necessary thermoregulation for each animal'. \(The September AVA Issues Paper response flagged the urgent need for adequate trough space.\)](#)

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. [Cattle must have much more space than this – i.e. 0.047. See response to Recommendation 20.](#)

22. That in relation to special categories of livestock, the following approach should apply to on-board stocking densities

- a. Buffalo: 10 per cent more space than required for cattle.
- b. Cattle and buffalo with horns: 30 per cent more space than otherwise required for cattle and buffalo without horns.
- c. Cattle and buffalo from 650kg and above: additional space allowance as determined by an approved heavy cattle/buffalo management plan.
- 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.
- e. Rams and goats with horns: 10 per cent more space than otherwise required for sheep and goats.

[See answer to Recommendation 20 above. The allometric K-value must be 0.047 regardless of species and voyage length.](#)

[\(a\) Buffalo: must have an extra 10 per cent more space than 0.047 above.](#)

- (b) Cattle and buffalo with horns: must not be live exported (Horns risk getting hooked in feed/water troughs; and are a danger to other stock)
- (c) Cattle and buffalo: must not be exported unless they weigh less than 500 kg. Ideal weight for cattle must be less than 380 kg to avoid lameness, a serious welfare issue.
- (d) All Pregnant cattle and buffalo: must not be live exported.
- (e) Rams and goats with horns: must not be live exported. (Horns risk getting hooked in feed and water troughs; dangers to other stock).

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. I would put the word 'urgently' before the word 'revised' above. The resultant HSRA model must be agreed by the AVA, VALE and peak animal welfare bodies. The standards must be based on science. See my response to Recommendation 1.

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. The AVA, VALE and peak animal welfare groups and the community must be informed and able to make submissions on the testing criteria and results. The HSRA model must be independently assessed and validated.

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. It is very concerning that northern summer shipments are to continue despite the AVA recommendation that such sailings cannot be recommended.

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 average daily mortality rate of greater than 0.05 per cent be added to the list of events that would qualify as a 'notifiable incident'. The RMR must be lowered for all species on all voyages; it must be noted that the RMR is inadequate in gauging levels of suffering (morbidity) on voyages. Thus an investigation must be triggered when a sheep shipment exceeds 0.71 per cent mortality (based on the 2017 average death rate). The RMRs must be supplemented with welfare indicators, and any poor animal welfare outcomes must be recorded and reported on, because they will reveal a need for a revision of ASEL and/or sanctions on exporters. Therefore animal-based welfare indicators in industry report W.LIV.3032 must be incorporated. ** (See response to Recommendation 27 below)

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 average daily mortality rate of greater than 0.025 per cent be added to the list of events that would qualify as a 'notifiable incident'. See response to Recommendation 26 above. Thus an investigation must be triggered when a cattle or buffalo voyage exceeds of 0.10 per cent mortality (based on the 2017 average death rate) **Recommendations 26 and 27 responses are based on

mortality figures at - <http://www.agriculture.gov.au/export/controlled-goods/live-animals/live-animal-export-statistics/reports-to-parliament>

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:

- 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’. All pens must be monitored, independently of exporters to ensure transparency and accuracy; not just one or two pens. NB. For dairy heifers, specific parameters relating to udder problems such as mastitis and engorgement, must be included as welfare indicators. The community is interested in all reports. Animal welfare groups must have access to all reports, without having to embark on FOI processes, as they do now. Independent observer reports must be made available to the community, especially in view of 60 Minutes report and earlier occurring atrocities.

It is disappointing that the draft standards do not mandate CCTV and real-time monitoring of animals and vessel conditions direct to an authorised DAWR employee, and independent third-party monitoring of on board conditions. This technology must be installed at the ships’ expense. There must be wet bulb temperature recordings 4 times a day on decks and pens. This would reassure the community about welfare on export ships. Experienced experts must monitor and analyse reports of all voyages to detect anomalies and randomly audit other voyages to ensure accuracy, and investigate if necessary. Heat stress scores must be mandatory for all voyages – not just sheep to the Middle East.

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. All voyages must provide bedding, regardless of voyage length and species, including cattle/buffalo voyages from Brisbane and northern latitudes to South East Asia and Japan. Bedding amounts must increase substantially if injuries are to be avoided. The standard for bedding provision in saleyards is greater than for live export despite the shorter holding time. Long road haul causes foot soreness and stress; so cattle must be able to rest. Bedding helps avoid abrasions and joint and hoof damage. Triple the current bedding per square metre. Replace every 3 days. Must be kept dry. Allowance for loading and unloading needs and hospital pens. Dairy cattle require much more bedding.

30. That the standard require the consistency and depth of bedding material to be routinely monitored. This wording is vague and open to abuse and neglect.

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 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. *It is an indictment of the industry and the department that after countless voyages the 'necessity and adequacy of amounts' of material carried to protect the faecal pad still need to be tested! Obviously from the disastrous Awassi Express (or should I say Anna Marra!) voyage in 2017 and other high mortality voyages before that, the failure of the faecal pad is a major known issue. Mandating the carrying of much larger quantities of appropriate bolstering material (sawdust etc) to cover all contingencies and to make the pad acceptable must be a priority.*

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 1000m² per application, with a minimum of 4 tonnes per 1000m² provided after each washdown. *Amounts for bedding must be increased at least threefold. A statutory reserve of bedding must be available for cattle/buffalo pens to avoid injuries associated with slippage, a major cause of downers and death.*

33. That bedding requirements for extended long haul voyages be agreed in the long haul management plan. *So long as bedding requirements are increased very substantially. I am not confident in DAWR having discretion on such plans. See response to Recommendations 31 and 32.*

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. *It is an indictment of the industry and the department that monitoring ammonia levels has not been addressed effectively after all these years of live export. Levels must be tracked 4xday on each deck at multiple positions using ammonia meters, and direct action taken when levels are exceeded. Once again the TAC is setting standards before the results of a project are available.*

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. *Vaguely worded, and 12 hours without water is too long. Prefer 6 hours.*

36. That the standards require water to be provided *ad libitum* 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. Automated water systems must be fitted for all voyages and for all species. Water troughs must have continuous monitoring and maintenance. Water curfews must not be imposed, regardless of destination or season. There must be water contingency plans in case of water system breakdown, and staff must be skilled in system maintenance.

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. 1% is insufficient. More chaff must be supplied on all voyages to minimise scouring and bloat in cattle and encourage shy feeders. Extra fodder, over and above ration, must be loaded in case of shipping delays.

38. That in relation to 3A.3.2, the ‘anticipated needs of the animals’ must include expected days of loading and discharge, rather than applying from the time of departure. Must carry additional fodder as well in case of shipping delays.

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). Fodder reserves for all voyages should be increased more substantially than this. NB. Breakdowns are common with ageing ships. Following breakdowns/high mortalities, it is illogical for DAWR to require exporters to load extra fodder ONLY on the subsequent voyage. On 22 November 2018 (a few days ago) MV *Jawan* carrying 4237 breeder cattle bound for Oman, began listing wildly from side to side as soon as it left Portland! The alarming video, shown on Channel 9 news, has already received many tens of thousand of hits on social media. It is yet another searing visual reminder, forever viewable on the internet, about the dangers inherent in live export ships – this time before the ship even lost sight of the Australian coast! (Note: Unlike slaughter animals, breeder cattle have no protection under ESCAS, limited protection though that is.)

40. That the standards are further reviewed without delay once current studies into fodder quality, quantity and pellet specifications are completed. After more than 30 years of live export, issues such as fodder quality, quantity and pellet specifications – basic food welfare issues – should be already well established. The issue of ‘fines’ should be urgently addressed. Any review must have input from the AVA, VALE and peak animal welfare bodies. This is yet another study that should have been done many years ago – and this would have prevented the suffering and deaths of millions of animals.

41. That the standards continue to require an *accredited stockperson* to accompany each consignment of livestock. I suggest that at least two accredited stockpersons accompany each consignment as back-up, where their training and qualifications allow, to AAVs. See also response to Recommendation 42 below

42. That the standards require one *competent stock handler* (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. Read in conjunction with Recommendation 41 above. One competent stock handler cannot possibly effectively oversight the welfare of 30,000 sheep and 3000 cattle/buffalo. This is grossly inadequate, considering that major problems/issues can and do arise any time - night and day. There must be one competent stock handler per 2500 head of cattle and one per 10,000 head of sheep. There must be sufficient competent stock handlers to enable shift work so that livestock are monitored 24/7. NB – On deck video monitoring can be useful but does not replace direct observation. Therefore, no, I do not believe the accredited stockperson can count towards the requirement in Recommendation 42 of a competent stock handler. The accredited stockperson has his/her own duties to perform. NB - Independent Observers are a promise made by Minister Littleproud to try to quell community outrage following the *Awassi Express* (now *Anna Marra*) disaster. IOs have separate monitoring and reporting duties; they must always be additional to AAVs and competent stock handlers/accredited stockpersons. IOs must be placed on every ship. Room for them must be made on board ship, with no exemptions.

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. I do not agree. Two or three independent AAVs must accompany every consignment regardless of length for supervision and monitoring purposes. Such AAVs must be appointed by an ‘independent’ regulator, not the exporter. DAWR must not have any discretion on whether an AAV is required or not. AAVs are always required. AAVs are required to optimise animal welfare through observation, diagnosis, treatment, autopsy and to manage disease control during each voyage as well as to collect and collate data to improve all future voyages. Long haul and extended long haul voyages and voyages with pregnant livestock must have sufficient AAVs, capable of working in shifts. Because of the large numbers of stock, it is impossible for one person to physically attend to the livestock needs and have time to sleep. There must also be an independent auditor with the final responsibility for reporting requirements.

44. That the standard not allow the same person to be both the AAV and the accredited stockperson for any given voyage.

Persons who hold qualifications as both a stockperson and an AAV cannot occupy two roles simultaneously on a voyage. These are two different roles on live export ships. A single person cannot physically attend to large numbers of animals at once and deal with other duties. See my responses to Recommendations 41 to 43.

Table 18 Other amendments

Animals that must never be exported:

Previous extreme mortality events for feral animals proves they are completely unsuitable for live export.

Feral buffalo - they are unused to human contact, handling and transport and are subject to serious welfare compromise. The article below is a concerning reaction to having Independent Observers on all live export ships. Transparency is essential for a social licence. What has the industry got to hide? 'Buffalo industry crisis as largest exporter threatens to pull out of trade', NT Country House with Matt Brann, ABC, 12.10.2018

Feral goats – because of previous extreme mortality events and serious concerns about their handling and care.

All Camels, Alpacas and Deer – (Feral or domestic) because their nervous disposition greatly exacerbates their risk of suffering.

Entire males - especially goats and dairy bulls

Very young animals (lambs, goat kids)

Pregnant livestock - Pregnancy testing has proven unreliable given the high numbers of shipboard births and other pregnancy issues.

Long horned animals – due to inherent dangers, including access to food and water, their potential to become entangled in troughs and danger to other stock. This is an on-farm management issue and must be part of proper preparation.

Horn requirements:

Dehorning/trimming must be undertaken well before selling animals for live export to ensure proper recovery and healing.

It is grossly inhumane to dehorn/trim the horns of feral animals. Dehorning/trimming causes stress and pain to domestic stock that are accustomed to handling; it is even more traumatic for feral animals unused to human contact. I have seen for myself the trauma experienced by domestic cattle during dehorning, which was performed by a vet.

Jan Kendall (November 2018)