

Submission to the Technical Advisory Committee
review of the Australian Standards for the Export of Livestock (ASEL)
Department of Agriculture and Water Resources
September 2018

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CPC

OUR TEAM IS PROUD
TO CONNECT THE BEST
AUSTRALIAN BEEF
TO THE WORLD

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The Chairman

Technical Advisory Committee

ASEL Review

Department of Agriculture and Water Resources

P.O. Box 858

Canberra City ACT 2601

Dear Chairman,

Please find attached Consolidated Pastoral Company's submission to the review of the Australian Standards for the Export of Livestock (ASEL).

The submission seeks to respond to the specific information requested by the Independent Advisory Committee where possible.

CPC is committed to achieving and sustaining state of the art animal welfare practices. That should be the primary objective of this review.

However, CPC considers it important the Advisory Committee take account of the already burdensome regulatory maize confronting Australian agriculture when drafting its report.

Further, CPC believes that this review should be considered in the broader context of the importance of the multibillion-dollar agricultural and beef industries to rural and regional economies and the environment across the country and the rewards to flow from capturing the opportunities developed and emerging through a growing Asian and Middle Eastern middleclass.

CPC is available to provide further information to the committee if required.

Yours sincerely,

Troy Setter

Chief Executive Officer

Consolidated Pastoral Company

Background

The Australian Standards for the Export of Livestock (ASEL) sets out the rules to ensure animals are fit to export and to manage the risks to animals' health and welfare throughout the export voyage.

The Technical Advisory Committee was appointed by the Department of Agriculture and Water Resources to review the standards.

In Stage 1 of the review, the Committee released an issues paper and draft reformatted standards, seeking public comments on priority areas for review in order to create a work-plan for this and the next stages of the review.

The Committee was also required to consider 13 unresolved issues from the 2012-13 ASEL review.

In May the Government announced that the review reporting date would be brought forward from mid-2019 to December 2018.

This submission responds to the Stage 2 discussion paper.

CPC notes that ASEL have not been updated since 2011. CPC also notes with concern that while a review of the standards took place over 2012-13 following the Farmer Review, it was not finalised. CPC strongly supports ASEL being updated and being the single point of standards for the export of livestock.

The failure to complete that review has allowed the regulatory regime to fall behind the science, resulting in the welfare standards underpinning a billion-dollar agricultural export industry, possibly not being fit-for-purpose and not up-to-date.

Introduction

CPC welcomes the opportunity to make a submission to this important Review.

This submission reflects CPC's direct experience as both a live cattle producer, exporter from Northern Australia and an importer into our two feedlots in Sumatra Indonesia.

We own and operate a portfolio of 16 cattle stations comprising around 5.5 million hectares with a carrying capacity of around 400,000 cattle. CPC sells into a range of markets both domestically and internationally, but its main focus is live cattle exports into Indonesia.

CPC holds a 90 per cent interest in PT. Juang Jaya Abdi Alam (PT. JJAA), the other 10% being owned by our Indonesian Joint Venture partner. PT JJAA was first established in 2000 and now operates two feedlots in Indonesia, located in Lampung (South Sumatera) and Medan (North Sumatera).

The Lampung feedlot has a capacity of 28,000 head, while the Medan feedlot has a capacity of 7,500 head; both facilities are "best in class" operations.

JJAA employs directly 180 people as permanent employees, plus hires up to 420 casual and contract employees. CPC's 2 feedlots in Indonesia have over 12,000 Indonesia and hundreds of Australian families that rely on them.

It is worth noting that CPC's business is primarily focused around beef cattle and this is reflected in the beef cattle focus of CPS's submission.

The review provides the live export industry, and other stakeholders, with the opportunity to strengthen the Australian Standards for the Export of Livestock (ASEL) and place this important export industry on a long term, sustainable footing.

CPC supports the view, expressed by the Productivity Commission in its report Regulation of Australian Agriculture, that in setting standards, governments must ensure they are both underpinned by credible science and are effectively regulated.

CPC also supports the Commission's view that government has a role in ensuring that a minimum level of welfare is achieved, where it would not otherwise be achieved as a result of the commercial incentives and actions.

The community perception of an industry, in relation to animal welfare practices, rests with the worst performer.

CPC notes and supports the view expressed by the Commission that many in the community may perceive a practice to be cruel because they do not understand the actual welfare outcomes for an animal.

The Commission also states:

- “ most people accept that there can be tradeoffs between standards and the costs and practicality of achieving them. For that reason, it is important that factual (scientific and economic) considerations are separated from judgements about what is appropriate (ethics). (2016, p. 202-205)

And:

- “An important policy question is whether regulatory arrangements can effectively manage the welfare of Australian live exports without imposing costs that lead to a substitution to exports from other countries.” (2016, p. 247)

The key issues

CPC notes that the main themes raised through submissions in stage one of this review were:

- Stocking density (12)
- Bedding (12)
- Heat stress (7)
- Shipments to the Middle East at particular times of year (6)
- Independent engagement of Australian Government accredited veterinarians (AAVs) (5)
- Presence of veterinarians on voyages (5)
- Minimum periods for livestock at registered premises (3)
- Ventilation and ammonium levels (3)
- Pregnancy testing requirements (3)
- On board veterinary medicines and equipment (3)
- Reportable mortality rates (3)

Objectives of the Technical Advisory Committee

CPC notes the Technical Advisory Committee handbook identifies the following objectives.

The committee will:

- make recommendations to the department aimed at ensuring all livestock that enter the supply chain are fit for export and maintain their health and welfare status throughout the export voyage
- carry out the review to facilitate the continuous improvement of the standards, considering new animal welfare research and innovations in industry practices in a timely manner
- facilitate contemporary outcomes-based regulation which will allow flexibility in achieving the required animal health and welfare outcomes, encourage innovation in industry practices and adoption of relevant technological improvements
- ensure the recommendations align with the guiding principles of the committee.

Stage 2 Issues Paper

CPC provides the following responses to matters raised in the Stage 2 issues paper based on extensive experience in the livestock export trade and informed by work commissioned by the Australian Livestock Exporters Council.

Chapter 3: Reporting and investigations

3.1 Reportable mortality rates

The current ASEL standards set a whole-of-consignment mortality rate for livestock export voyages which, if exceeded, triggers a requirement for an investigation of that voyage by the Department and reports published on the Department's website.

These trigger levels are referred to as the 'reportable mortality rate' (RMR) and vary for different species of livestock and different voyage length. The discussion paper notes that as a result of the investigation, compliance and/or corrective actions may be taken.

The reportable mortality rate triggers are:

- Cattle and buffalo, voyages \geq 10 days: 1 per cent; and
- Cattle and buffalo, voyages $<$ 10 days: 0.5 per cent.

ASEL 2012-13

The issues paper notes that the previous ASEL Review Steering Committee did not reach agreement on reportable mortality rates.

Further, the Steering Committee proposed either leaving the reportable mortality rate at the status quo or halving the rate for each species.

The current review

The issues paper notes that a number of submissions to Stage 1 of this review commented on voyage reporting requirements including calls for the thresholds to be proportionally linked to averaged mortality rates to comments that the reduction of rates will not improve voyage outcomes and only increase the cost burden to industry.

CPC Comment

It is CPC's view that the collection of information relating to animal welfare and mortality, not just mortality data, is important to ensure the proper management, effective regulation and transparency of the trade. However, any expansion in the regulated collection, publication and use of data would need to be properly informed.

CPC believes any move to further reduce the reportable mortality rates must also be informed by science not politics. Reportable mortality rates also need to be taken into context with the full supply chain from birth to harvest.

3.2 Voyage reporting requirements

Current Requirements

The reformatted ASEL includes reporting requirements within section 4E and includes the following reporting requirements during the voyage:

- Notifiable incidents (as defined in ASEL)—reported by the Master or AAV within 12 hours of occurring
- Daily reports—reported by the AAV or stockperson for voyages over 10 days
- End of voyage report—reported by the AAV or the stockperson regardless of the duration of the journey and provided within five days of completion of discharge at final port of disembarkation.

ASEL 2012-13

The issues paper notes that the ASEL Review Steering Committee discussed the following difficulties raised in submissions, that the reports:

- do not include pen or specific area reports smaller than the deck/tier level
- are not standardised and therefore are administratively burdensome
- include few animal welfare indicators other than respiratory type, faeces type and feed and water consumption, and
- focus on mortality and environmental reporting.

The issues paper notes there were also suggestions that the daily report be expanded to include other information such as the average temperature (wet bulb reading) on the hold and the bridge in addition to on decks as well as:

- Name of AAV and Accredited Stock-person where applicable
- Date(s) of loading, name of ports of discharge
- Date(s) of discharge in each port
- Duration of the voyage in days
- Fodder and water consumed during the voyage and detail of any issues surrounding their supply, availability and /or quality
- Feed consumption – average per head
- Water consumption – average per head
- Number of livestock born during the voyage and the identities of the dam(s) by species, commercial class and ear tag
- Number of abortions during the voyage and the identities of the dam(s) by species, commercial class and ear tag
- Detail of any health and welfare issues that emerged during the voyage, measures used to mitigate any issues and their effectiveness.
- Treatment report including (the number treated during the voyage, reason(s) for the above treatment(s), drugs and equipment used in treatment and an assessment of their availability and effectiveness (The AAV or stock-person should be prepared to make their detailed treatment records available to the Department upon request)
- Detail on the conditions of the decks during transit in relation to bedding and any wash down(s) undertaken including an assessment as to their timeliness and effectiveness
- Environmental conditions during the voyage including sea conditions, temperatures and humidity as well as an assessment of the effectiveness of the vessels ventilation
- Detail of any vessel related issues that affected the health and welfare of the livestock
- Total mortalities by deck, hold and tier for each species loaded as a part of the consignment
- Total mortalities by species and commercial class for the consignment
- Total mortalities by species and cause for the consignment including the number euthanised
- Detail of any miscounts detected at the completion of discharge
- Assessment of relationships between Master/Accredited Stock-person/Accredited Veterinarian and Crew
- Any other relevant information including activities attempting to board or delay the vessel, piracy precautions, unforeseen delays due to weather and foreign government officials

McCarthy review

The issues paper notes the McCarthy Review recommended that *‘the use of both a panting score and a heat stress score should be a mandatory requirement in the daily report.’*

This has now been implemented.

CPC comment

As stated in CPC comments under issue 3.1 the collection of information relating to animal welfare and mortality must inform both industry about the effectiveness of its management practices in meeting acceptable welfare standards and government about the effective regulation of the trade.

However, any expansion in the regulated collection of data and its reporting would need to be properly informed so that it improves animal welfare outcomes and reduces risk.

CPC believes any move to further reduce the reportable mortality rates must also be informed by science not politics. CPC supports the continued focus of the wider red meat industry to reduce mortality and improve animal welfare.

The list is long and complex and would appear not to pass that test.

Chapter 4: Heat stress risk assessment

The issues paper notes that the Department has undertaken to test and consult on the development of a welfare-based approach to the heat stress risk assessment (HSRA) model arising from Dr McCarthy's recommendations 3-5, 7 and 8.

We are advised that the Department has established a Technical Reference Panel to provide expert advice and a findings and proposals document on the HSRA model.

Chapter 5: Sourcing and preparing animals

5.1 Sourcing *Bos Taurus* cattle

Current Requirements

The current (reformatted) ASEL states:

- 1A.3.2 (c) (iii): *Bos Taurus* cattle from an area of Australia south of latitude 26° south must not be sourced for export to the Middle East from May to October unless an agreed livestock heat stress risk assessment indicates the risk is manageable as per the testing criteria specified in this Standard.
- 1A.3.2 (c) (iv): *Bos Taurus* cattle with a body condition score of five (5) or more must not be sourced for export from or through any area north of latitude 26° south from 1 October to 31 December (inclusive).

ASEL 2012-13

The ASEL Review Steering Committee proposed two options for the limit on the upper body condition score of *Bos Taurus* cattle to be sourced above 26 degrees South from October to December:

- Option 1—upper body conditions score of 5
- Option 2—upper body condition score of 4

The ASEL Review Steering Committee also proposed two options for the export of *Bos Taurus* cattle to the Middle East from May to October.

The options were a prohibition, or the status quo:

- *Bos Taurus* cattle bred in an area of Australia south of latitude 26° south must not be sourced for export to or through the Middle East from May to October unless a livestock heat stress risk assessment agreed by the Department indicates that the risk is manageable.

Stage 1—2018 Review

The issues paper notes it was again raised in 2018 review submissions that *Bos Taurus* cattle originating from southern Australia are at significant risk of heat stress if transported during the Middle Eastern summer.

It was noted through Stage 1 that the exclusion period for sourcing fat *Bos Taurus* cattle above 26 degrees South from October to December does not align with either the southern or northern hemisphere summer, nor with the northern Australian wet season.

CPC comment

CPC supports the ALEC view that caution be exercised in making significant changes to the primary objective in the HSRA model.

CPC supports the ALEC comment that:

- “Significant changes should not be made until a new objective has been identified and tested that is simple to collect and explain, robust, reliable and repeatable.
- “Until a new measure has been identified and tested ALEC recommends, as an interim measure, redefining the HSRA objective to “less than a 2% chance of 1% mortalities per line of livestock”.
- “ ... research be undertaken to better understand the importance of heat stress across all significant markets and to explore the further application of the HSRA model as required.”

5.3 Maximum weight of cattle and buffalo sourced for export by sea

Current Requirements

The reformatted ASEL states:

- 1A.3.2(c): for export by sea, cattle must have an individual liveweight between 200kg and 650kg inclusive.
- 1A.3.3(c): For export by sea, buffalo must have an individual liveweight between 200kg and 650kg inclusive.

ASEL 2012-13

The issues paper notes the ASEL Review Steering Committee considered, but did not agree on, two maximum weights for cattle and buffalo sourced for export as slaughter and feeder animals:

- Option 1 —status quo (650 kg)
- Option 2 — lower maximum weight (500 kg)

The issues paper notes the view that heavy animals are at higher risk of abrasive injuries due to the exertion applied/transferred against their joints by their sheer weight.

It was suggested that cattle greater than 500 kg should not be sent on long haul voyages as their weights are not compatible with musculoskeletal health when housed on ship deck surfaces.

Stage 1—2018 review

The issues paper notes that based on submissions to the 2018 review that cattle over 500 kg are a higher risk category and at greater risk of being unable to get up should they fall or suffer foot and leg problems during the voyage.

The issues paper also notes the ALEC recommendation that the current maximum weight provisions in ASEL continue to apply.

Standard 1.9 of ASEL states:

- “Cattle and buffalo sourced for export as slaughter and feeder animals - must have an individual live weight of more than 200 kg and less than 650 kg or, if outside these weights, have written prior approval from the relevant Australian Government agency;

CPC supports the ALEC position and from experience strongly prefers that all animals should be assessed on overall fitness to travel and travel conditions rather than just relying on individual maximum weight. Often heavy cattle in good body condition are very healthy. As the production side of the industry continues to invest in higher performing genetics cattle weights globally have been continuing to get heavier at a younger age.

5.6 Pregnancy test requirements and limits

The current (reformatted) ASEL states:

- 1A.3.2(c)(i): (export by sea) female feeder or slaughter cattle must be determined not to be detectably pregnant by a valid pregnancy test or accompanied by a valid spay declaration.
- 1A.3.2(c)(ii): (export by sea) female breeder cattle must not be more than 190 days pregnant at the scheduled date of departure and tested in accordance with the requirements of a valid breeder pregnancy test.
- 1A.3.3(c)(i): (export by sea) female feeder or slaughter buffalo must have been determined not to be detectably pregnant by a valid pregnancy test or accompanied by a valid spay declaration
- 1A.3.3(c)(ii): (export by sea) female breeder buffalo must be no more than 220 days pregnant at the scheduled date of departure and tested in accordance with the requirements of a valid pregnancy test.
- 1A.3.4(c): all female feeder or slaughter sheep over 40 kg and all Damara female sheep must be determined to be not detectably pregnant and tested in accordance with the requirements of a valid pregnancy test.

ASEL 2012-13

The issues paper notes submissions to the 2012-13 ASEL review indicated that current pregnancy testing requirements are inadequate.

The paper notes there was a general view that requirements for competency of pregnancy testing must be consistent and of the highest standard. It was noted that research project LIVE.208 recommends a limit to pregnancy of 180 days (end of second trimester).

Stage 1—2018 review

There were a number of submissions to Stage 1 of the current review that have commented on pregnancy test requirements and limits, including that:

- pregnancy testing criteria for beef cattle should reflect an Australian national standard for pregnancy testing once it has been developed/implemented.
- pregnancy testing of all animals must be performed by competent veterinarian.

Pregnancy Test Requirements and Limits

CPC supports that:

- the TAC considers the outcomes of the MLA project developing a national pregnancy diagnosis standard before making significant changes to the pregnancy testing arrangements in ASEL, including the qualifications required,

- the ASEL testing criteria be amended so that cattle certified as ‘not detectably pregnant’ within 45 days of export are deemed to have had a valid pregnancy test.
- the pregnancy testing requirements be amended to read as follows: ‘A veterinarian may base this certification on assessment of the animals by a method other than manual palpation if the veterinarian determines that cattle or buffalo are too small to be manually palpated safely.’
- paragraph 1A.3.4 (c) be replaced with a paragraph as follows “All female feeder and slaughter sheep over 40 kg must be determined to be not detectably pregnant with a valid pregnancy test.”
- For cattle exported by air, the maximum stage of pregnancy allowed should be 220 days, and
- ASEL should have a paragraph to the effect that the Standards may be varied, with approval from a DAWR authorised officer if this will enhance animal welfare outcomes.

Chapter 6: stocking densities

6.1 On board stocking densities

Current Requirements

ASEL has established a suite of stocking densities. These include:

- Standard/default stocking densities. These stocking densities provide base space allowances for livestock during standard exports (e.g. short-haul exports).
- Cattle on long haul voyages and voyages to the Middle East.

ASEL 2012-13

The issues paper notes that no agreement was reached by the ASEL Review Steering Committee on whether the current on-board stocking densities are appropriate or should be changed.

On board stocking density

The issues paper notes that the 2012-13 ASEL Review Steering Committee examined different on-board stocking densities based on the allometric model, with k coefficients based on research from Petherick et al, 2007 literature review which states that:

- a k coefficient of 0.027 allows the simultaneous lying of animals, but data suggests there is reduced lying time of animals stocked at this allowance, and it is unknown whether this would provide sufficient space for animals to adequately access feed and drink on board a vehicle/vessel.
- a k coefficient of 0.033 appears to be the threshold below which risks to welfare and productivity are increased. It appears to be a threshold below which behaviour, productivity and some indicators of stress are adversely affected.
- a k coefficient of 0.047 allows all animals additional space to that required for all animals to be lying simultaneously, to potentially enable better access for all animals to resources.

CPC comment

CPC supports the application of allometry to determine stocking densities for livestock exported by sea from Australia.

CPC agrees that a stock density that allows all livestock in a pen to simultaneously lie down will enable the industry to meet acceptable welfare standards without compromising commercial objectives for producers and other stakeholders along the supply chain.

The agreed allometric k-value that allows livestock to lie down simultaneously is 0.027.

CPC has experience in both land and sea transport where livestock have surplus space and detrimental animal welfare outcomes can occur. Surplus space can allow animals to slip over or pressure against each other and at times fight. Space allocation is broader than the ability to lie down and to manage the risk of heat stress. Stocking densities need to retain appropriate flexibility on a pen by pen basis to ensure animals have the appropriate space for the conditions they are experiencing.

CPC supports that space allocations greater than those proposed may result from a consideration of heat stress risk, but space allocations due to heat stress need to be independent of space allocations from allometry.

CPC agrees with the view that additional space allocations to avoid heat stress should be separately determined.

6.2. Stocking Densities in Registered Premises

Current Requirements

The current (reformatted) ASEL states:

- 2B.4 Animals have an appropriate amount of space

Livestock in the registered premises must be provided with the appropriate amount of space in accordance with the relevant registered premises stocking density.

ASEL 2012-13

The issues paper notes the ASEL Review Steering Committee discussed the proposal that there should be a standard stocking density for each species, regardless of the length of time the animal is held at the registered premises.

The Committee then formulated the following options:

- Option 1—include departmental discretion to change stocking densities at registered premises
- Option 2—no departmental discretion

For the stocking density in registered premises for cattle, buffalo or camels, the ASEL Review Steering Committee proposed two options:

- Option 1—Status Quo
- Option 2—increase space to 9 m² from 10 days rather than 30 days for cattle, buffalo or camels held for **10 days or more**, a minimum of 9 m², based on an individual liveweight of 500 kg (this allowance can be varied by 0.09 m² for each 5 kg change in individual liveweight)

for cattle, buffalo or camels held for **less than 10 days**, a minimum of 4 m², based on an individual liveweight of 500 kg (this allowance can be varied by 0.04 m² for each 5 kg change in individual live weight)

Stage 1—2018 review

The issues paper notes that throughout submissions to Stage 1 of the review, it was raised that the proper preparation and rest of animals prior to export has a direct impact on the welfare of the animals throughout the voyage.

However, none of the submissions specifically mentioned stocking densities at registered premises as an issue.

CPC comment

CPC supports that the Standard Cattle Unit used for calculating the Registered Premise density in ASEL (500 kg) should align with the Standard Cattle Unit used for calculating feedlot densities domestically (600 kg).

CPC also supports ALEC submission that the discretion to allow a different density should be retained, as it is relevant for addressing situations where the time in a Registered Premise may exceed the time cut-offs for unforeseen circumstances (e.g. delayed vessel) or for only small periods or numbers of animals.

Chapter 7: On board resources and management

7.1 Management of bedding, and ammonia levels

Current Requirements

The current (reformatted) ASEL states:

- 3A.3.3 Bedding: For export by sea, bedding must be provided in accordance with the following specifications:
- Cattle and buffalo on voyages of ten (10) days or more must be provided with sawdust, rice hulls or similar material to be used exclusively for bedding at a rate of at least seven (7) tonnes or 25 m³ for every 1000 m² of cattle pen space.
- 3B.4(b): When bedding is used, it must be maintained to ensure the health and welfare of the livestock and meet requirements as set out in paragraph 3A.3.3 of this Standard.

ASEL 2012-13

Bedding

The issues paper notes no agreement was reached by the ASEL Review Steering Committee on increasing bedding and bedding management requirements.

The Steering Committee proposed several options for bedding:

- Option 1—7 tonnes per every 1000 m² of pen space for cattle, buffalo, deer and camelids on long haul and extended long haul voyages, excluding cattle and buffalo loaded from Brisbane or a port north of latitude 26° south and exported to Southeast Asia or Japan.
- Option 2—Remove exemption and applies to all voyages regardless of length (7 tonnes or 25 m³ per every 1000 m² of pen space for cattle, buffalo, deer and camelids)
- Option 3—increased rate and additional requirements for management of bedding

Provision of bedding

The issues paper notes that cattle and buffalo on all voyages must be provided with sawdust, rice hulls or similar material to be used exclusively for bedding at a rate of at least 4t per 1000m² per application (approximately 2.4cm depth spread consistently), including before the animals are loaded.

The paper further notes bedding must be provided to cattle, buffalo, deer or camelids at all times, except during the immediate wash down and drainage process.

Submissions to the 2012-13 review suggested that ASEL should ensure enough sawdust is provided/ loaded onto the vessel to allow for bedding replacement every 3–4 days of voyage duration, to coincide with deck washing programs, as well as enough to have the ship ready at loading and to provide enough sawdust for discharge points, ramps and traffic areas.

Further, that a lack of appropriate bedding leads directly to contamination of water and feed troughs with urine and faeces and poor animal health and welfare outcomes.

CPC supports the view that for cattle with straw or other bedding systems, the bedding should be maintained to provide cattle with a dry and comfortable place in which to lie. However, sheep faeces generally lead to a moist yet firm faecal pad for the animals to rest on. This substrate provides a soft resting surface and poses no physical injury risk.

Ammonia

The current ASEL v2.3 does not specify standards for ammonia levels however, does include the requirement for livestock services on the vessel to ensure that the health and welfare of the livestock are maintained.

A new standard was drafted by the 2012-13 ASEL Review Steering Committee which included the requirements for livestock services on the vessel to ensure that the health and welfare of the livestock are maintained.

It was recommended that ammonia levels must not exceed 25 ppm as the point in which measures to reduce must take place. The contentious issue was whether ammonia levels need to be reported daily on their daily voyage report due to the cost of the recording units.

McCarthy review

Recommendation 14

McCarthy recognised:

- ‘the good work within the cattle export trade whereby the cattle pad is being extended (in terms of time) by either putting down abundant sawdust at the commencement of the voyage or adding sawdust on a strategic basis to areas that need it as the voyage progresses.
- This same strategy may have a place in the sheep trade where some pad areas are known to deteriorate.
- Sawdust could be spread in these areas, either at the voyage outset, or strategically as the voyage progresses. It is not suggested that sawdust be used on a routine basis for the entire cargo.’

McCarthy made many recommendations regarding ventilation that have been jointly implemented by the Department and AMSA.

McCarthy considers ventilation has three tasks:

- One is to remove the heat and water vapour produced by the animal.
- Another is to lift moisture from the sheep manure pad.
- The final task is to remove any possible build-up of noxious gases (such as ammonia).

Stage 1—2018 review

The issues paper notes several submissions to Stage 1 of the 2018 Review commented on provision of bedding and management of ammonia levels.

The paper notes a number of submissions commented that the bedding requirements within the standards are insufficient to mitigate risks, ensure acceptable welfare outcomes and to minimise injuries such as abrasions and soft tissue damage.

These submissions noted that the amount of bedding needs to be increased and bedding management requirements included within the standards. A literature review (W.LIV.0290) on bedding management and air quality on livestock vessels was also provided to the Committee.

The issues paper states submissions also noted that it was unclear why the standards do not require bedding for cattle and buffalo on voyages less than 10 days, or those originating from northern regions travelling to South East Asia or Japan.

It was also noted that whilst bedding is a key component in managing the on-board environment to minimise abrasions, lameness, manure, pad degradation, potentially harmful emissions (such as ammonia) and slipping, but any increase or extension in the current bedding volumes would not be required.

CPC comment

CPC supports the ALEC view that:

- in the absence of clear evidence that the changes to bedding requirements will enhance welfare outcomes, the ASEL requirements not be changed.
- the current bedding research project being conducted by the LEP be allowed to run its course, and a review of ASEL bedding requirements undertaken after completion with ASEL requirements only amended, if appropriate, based on sound research evidence.

7.2 Water, fodder and chaff requirements on vessels

Current Requirements

The current (reformatted) ASEL states:

- ASEL v3.0 Paragraph 3A.3.2 (c) states that ... ‘Fodder for cattle exported from an Australian port south of latitude 26° south must include at least 1 per cent of the required feed as chaff and/or hay.’

ASEL 2012-13

The issues paper states it was agreed that all livestock on the vessel must have access to adequate water of a quality to maintain good health and suitable feed to satisfy their energy requirements.

However, the paper notes it was suggested that:

- livestock are more difficult to unload when there is feed in the troughs causing the process to be slower.
- there may also be curfew requirements in place in importing countries for the in-market road transport legs.

Livecorp/MLA proposed specific phrasing to provide a requirement for feeding the animals while waiting to be discharged, but allow a judgment to be made while discharging (when animals are unlikely/should not be feeding):

The issues paper notes previous successful use of hay and cubes from bails and bags was mentioned, however the practical difficulties of such a feed on board was noted.

It was also noted that there is no pellet specification for cattle and buffalo, and the camel specification and the sheep and goat pellet specifications are identical.

Stage 1—2018 review

The issues paper notes several submissions released under Stage 1 of the current review made comments, specifically in relation to fodder and chaff requirements on vessels.

The paper states multiple submissions raised fodder and additional chaff as key areas for revision. These submissions mentioned that additional fodder should be loaded on various kinds of voyages, either long haul, voyages with dairy heifers or all voyages regardless of load port. Loading additional chaff for therapeutic use in hospital pens was also suggested.

It was noted that pellet specifications in ASEL should be updated to reflect current industry knowledge.

It was also recommended that for vessels on their maiden voyage and for extra long-haul voyages, additional fodder is loaded as contingency for delays and breakdowns. the method of calculation for feed required on the voyage was also discussed with the following suggestions:

- Feed available for a voyage is calculated using feed on board at the time of departure, after deducting fodder consumed in port.
- Feed requirements for a voyage include provision for fodder consumed on board until the last animal is discharged, with three day's additional fodder as contingency for delays and breakdowns.

8. On Board Personnel, Animal Management and Care

CPC supports the view that exporters ensure that there are sufficient, competent personnel on-board, particularly accredited stock people, to ensure that livestock receive the necessary care and oversight.

CPC also supports the view that the number of accredited stock people required on a vessel / consignment should be expressed as an outcomes-based standard, rather than a prescriptive regulatory limit.

- The requirement for an AAV to accompany a voyage should reflect the extent of veterinary challenge that may be faced.

It is CPC's view that current arrangements relating to AAVs should be retained to provide the department with the discretion to place AAVs on voyages as it sees appropriate, according to risks.

With respect to the Independent Observer Program it is CPC's view that:

- Much greater clarity is required on the roles and responsibilities of independent observers and the objectives of that program.

CPC also supports the view that best practice regulatory approaches should be adopted in which required outcomes sought from the Independent Observer Program are identified in regulation, but the means of achieving these outcomes left for the market to determine.

CPC supports the view that scope should be provided for achieving the purposes of the Program through other mechanisms e.g. the employment of monitoring technology, the direct employment of the AAV and or the stockman by the department.

Automated (tamper proof) monitoring may offer several advantages over human monitoring such as providing an historical record of events free of interpretation of a human observer.

Conclusion

It is the view of CPC that Australia leads the world in animal welfare practices and must continue too. Australia is the only country that requires specific animal welfare outcomes for livestock exports. The industry and the regulator are well placed to continue pressure on importing countries to lift welfare standards.

The Government has legislation in place that imposes tough conditions, along the supply chain, on the livestock export industry including the Australian Standards for the Export of Livestock (ASEL).

It is CPC's view that suggestions that the live trade could be completely replaced by chilled and frozen meat fails to consider the requirements of domestic and global markets. Australia's production environment with its strengths and weaknesses and the impact on Australian rural and regional communities and the environment if there was not live export.

The debate around livestock exports must focus on how to meet reasonable community standards, continue to improve animal welfare and community outcomes and not how to shut down this billion-dollar trade.