



**Submission on the  
Australian Standards for the Export of  
Livestock (ASEL)**

September 2018

**NSW Farmers' Association  
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## About NSW Farmers

### *A profitable and sustainable New South Wales farming sector*

The NSW Farmers' Association is Australia's largest state farming organisation representing the interests of its farmer members.

Farmers across New South Wales produce more than \$15 billion worth of food and fibre every year, representing around one quarter of Australia's total agricultural output. Our state's unique geography means a wide variety of crops and livestock can be cultivated and nurtured. NSW Farmers is Australia's only state-based farming organisation that represents the interests of farmers of all agricultural commodities – from avocados and tomatoes, apples, bananas and berries, through grains, pulses and lentils to oysters, cattle, dairy, goats, sheep, pigs, and chickens.

Our focus is not just on issues affecting particular crops or animals – it extends to the environment, biosecurity, water, economics, trade, and rural and regional affairs. We also have an eye on the future of agriculture; we are advocates for innovation in agriculture, striving to give our members access to the latest and greatest innovations in research, development, and extension opportunities. Our industrial relations section provides highly specialised advice on labour and workplace matters.

Our regional branch network ensures local voices guide and shape our positions on issues which affect real people in real communities. Members are the final arbiters of the policies of the Association – through our Annual Conference and elected forums such as Executive Council, members can lobby for the issues which matter to them and their community to become Association policy. Our issue- and commodity-specific Advisory Committees are elected by members to provide specialist, practical advice to decision makers on issues affecting the sector. We are proudly apolitical – we put our members' needs first.

In addition, NSW Farmers has partnerships and alliances with like-minded organisations, universities, government agencies, and commercial businesses across Australia. We are a proud founding member of the National Farmers' Federation.

## **Executive summary**

NSW Farmers Association welcomes the opportunity to comment on the review of the Australian Standards for the Export of Livestock (ASEL). The focus of the review must be on ensuring that the standards within ASEL support high animal welfare outcomes, are based on scientific evidence, and are fit for purpose.

Each year the live export industry generates \$1.4 billion for the national economy. The majority of livestock exported occurs in other state but farmers in NSW do produce livestock for these export markets. Our farmers provide a broad spectrum of livestock including sheep, goats, cattle, and dairy cattle into these markets.

Australia is recognised as a world leader in animal health and welfare. This is a result of our commitment to high quality animal welfare outcomes that are underpinned by continuous research and development, training, and education, both in Australia and by our trading partners. As an Association of farmers we know that when Australia exports live animals it also exports high quality animal welfare practices that raise standards across the global trade. Australia is the only nation that demands animal welfare is monitored throughout the whole export supply chain, from farm gate to in-country. Australia must maintain this vital leadership role. Ensuring that the ASEL standards remain appropriate to produce high animal welfare outcomes and are based on current scientific evidence is central to this.

## **ASEL Review**

NSW Farmers' priority for the review of ASEL is on ensuring that the standards set provide high animal welfare outcomes and are supported by scientific evidence. We have provided responses to the questions from the Issues Paper to achieve this priority.

### ***Animal Welfare***

Animal welfare is the highest concern for farmers. It is vital that the standards set for the live export industry ensure that high animal welfare outcomes are achieved, both throughout the voyage and also in the importing country. The ASEL requirements are vital to ensuring that high animal welfare outcomes are achieved, as they ensure that livestock are fit for export, and help manage the risks to livestock health that can occur during transit.

It is essential that the standards required by the live export industry are effectively enforced. We note the ongoing review aimed at ensuring the required standards are adhered to. We agree that those not meeting the required levels should be penalised.

- ***Animal Welfare Indicators***

NSW Farmers' supports the concept of animal welfare indicators in principle. This support has been demonstrated by industry investing in research projects to examine the development of welfare indicators for the live export industry.

Indicators are our preferred method for tracking welfare outcomes. They allow for the early identification of potential issues and for proactive management strategies to be implemented to minimise risks to livestock. The use of effective animal welfare indicators is preferable to the existing ASEL standards, which focus on on-board mortality and non-compliance, methods that identify problems retrospectively.

However, it is vital to acknowledge that the benefits offered by indicators will only be achieved provided that they focus on the correct areas. For the indicators to be effective they must monitor areas that allow for enhanced welfare outcomes through proactive management. The identification of these requisite areas needs to be based on evidence. Prior to indicators being included within ASEL there must be clear evidence that the identified indicators will improve animal welfare outcomes. Currently this requisite evidence threshold has not been met. It would be inappropriate to engage in reforms without clear evidence, as there is the risk that it could create perverse welfare outcomes.

- ***Stocking Densities & Heat Stress***

NSW Farmers' supports stocking densities that promote quality animal welfare outcomes, based on science. The recent McCarthy Review represents a paradigm shift in the management and regulation of live export, with a move from a heat stress risk assessment based on mitigating the risk of mortality to mitigating the risk of heat stress. The new approach will reduce the stocking density on ships during high risk periods and has the potential to improve welfare outcomes through the whole year. We support the principle of this new approach and the key is ensuring that in practice it delivers scientifically based stocking density requirements.

We also recognise the need for industry to conduct further work to provide a robust heat stress risk assessment framework. It is vital that the necessary research and testing is undertaken to ensure that animal welfare outcomes are supported. At present, there is not sufficient evidence in this area for such a requirement to be included. It would be inappropriate to proceed without clear scientific evidence.

- ***Pregnancy testing***

NSW Farmers' supports both veterinarians and accredited pregnancy testers undertaking pregnancy scans prior to the export of livestock, as both produce high outcomes in terms of accuracy. It is important that accredited pregnancy testers must have the relevant qualifications and training.

- ***Minimum time at a registered premises and management of shy feeders***

NSW Farmers' believes that the time that livestock must be in registered premises is sufficient. It is important that livestock are monitored during their time at these premises, to ensure that those unable to adapt to their changed environment are identified and the required actions are undertaken.

### ***Reporting and Monitoring***

NSW Farmers' recognises the importance of reporting and monitoring to provide farmers and the broader community with greater transparency on the live export industry.

We support additional reporting requirements to give the public greater transparency. However, increased transparency does not simply mean making data publically available. To enhance transparency the information must be presented in a way that enables the community to understand the operation of the industry. This means that the information must be contextualised to support understanding and minimise the risk of it being misinterpreted or manipulated.

## **Australian Standards for the Export of Livestock (ASEL) Review**

Unrefined data can be easily manipulated, by, for example, anomalies being generalised. It is essential that an increase in reporting and monitoring is conducted through a framework that ensures that information is contextualised.

### ***Science Based***

NSW Farmers' strongly supports the proposal that the ASEL standards be based on scientific evidence. We remained concerned about several existing standards, including Standard 3.9, relating to the export of sheep from pastoral areas. We consider that further work is required to ensure that this standard appropriately reflects the risk posed by exporting these livestock. Further research is also required to uphold this regulation. The current broad geographical restriction under ASEL is not appropriate.