

## **Review of the Australian Standards for the Export of Livestock (ASEL): Proposed new format for the standards and key issues for the committee to address in the next stages of the review**

### **Submission by Sentient**

#### **Introduction**

Sentient, Australia's independent veterinary animal welfare and ethics organisation, welcomes the opportunity to comment on the government's draft review of the Australian Standards for the Export of Livestock (ASEL). This review is long overdue and since the initial standards were developed, there have been significant advances in our scientific knowledge of the welfare needs of livestock in transit. Likewise, we have seen huge shifts in public opinion about what is considered acceptable about the treatment of animals in the live export trade due to exposes and other evidence of severe health and welfare compromises faced by large numbers of animals during export voyages. For these reasons, we advocate for this review to be scientifically based and transparent, with high accountability in all its processes. The welfare of animals in the live export trade is an important issue to many Australians and also has implications for our international reputation.

#### **1. Independent scientific review**

Before the review of the ASEL, an independent scientific review must be undertaken to ensure all stakeholders have access to relevant and robust scientific literature. This should become an integral part for any standards review process to ensure transparency and accountability. It also provides evidence-based information to many stakeholders who may otherwise be unable to access such information to allow more informed discussion and contributions to be made. It is essential that those undertaking the review are appropriately qualified and are completely independent of the interests of all stakeholders. Further, the review should only comprise peer-reviewed published literature and no other publications such as industry research reports. To ensure transparency, the review report must be circulated to all stakeholders and made available publicly in an un-edited form.

#### **2. Key aspects to be reviewed**

The live export industry has been criticised due to inadequacies in meeting contemporary animal welfare standards. The following elements are considered to be of extreme importance to animal welfare and therefore require action to improve relevant standards under ASEL. These are not listed in order of importance as they are all of equal importance.

- **Preparation of livestock prior to export**

The condition of livestock selected for export is paramount in preventing compromised animal welfare. Key areas which need to be reviewed include the minimum time for animals to be held at assembly areas prior to feedlot, minimum time off shears, and whether current inspection processes are adequate to ensure that only fit animals are exported, including ensuring no animals in mid-late pregnancy. Also, special consideration must be given regarding continuing to allow



'high risk' animals to be exported, including very young animals, feral goats, fat animals, deer, camels and alpacas.

- **Independent veterinarians to accompany consignments**

The two essential requirements to ensure high standards of animal welfare are that:

- Every journey must have an accompanying veterinarian
- On-board veterinarians must be independent of the live export company

Many groups have called for this, including the Australian Veterinary Association and the RSPCA. To continue to conduct live export without this fundamental change is to demonstrate a lack of commitment to effective improvements in animal welfare. This critical requirement was also recommended in the Keniry Review (2004) nearly 15 years ago and yet the government has not implemented this.

- **Heat risk**

- a) Heat risk assessment

As part of the independent scientific review, the 'heat stress model' used by exporters to assess heat stress risk must be reviewed. Given that this is a critical tool to inform decisions regarding the approval for consignments, it is essential that it is independently assessed and validated.

- b) Export during the Middle Eastern summers

It is well documented that mortalities rise significantly when sheep are exported during winter in Australia to arrive in summer in the Middle East. Basic stock husbandry informs us that animals are unable to adapt to significant swings in temperature and humidity, especially when experiencing other cumulative stresses. Previous reviews (Keniry, 2004; Farmer, 2011) have highlighted this issue and yet appropriate action has still not been taken by government or industry. Heat stress has also been reported in the scientific literature as a significant factor affecting mortality rates (Caulfield et al. 2014). We advocate that the government abolishes shipments of sheep from Australian winters to Middle Eastern summers.

- **On-board conditions**

- a) Stocking density – the basis for current stocking densities is not valid nor verifiable and these densities are much higher than OIE standards. High stocking densities do not allow free movement of animals allowing easy access to food and water and can exacerbate the risk of heat stress. Also, it is more difficult to identify shy feeders and sick animals, which is essential to allow appropriate action to be taken to ensure high welfare.

- b) Provision of bedding – appropriate bedding is essential to ensure animals are comfortable, especially during long haulage journeys. Without appropriate bedding, some animals may suffer injuries due to prolonged lying on unsuitable surfaces and during attempts to rise. Current ASEL standards are inadequate.



Please feel free to contact us to discuss our comments further.

With regards,  
Dr Rosemary Elliott, President  
Dr Adele Lloyd, Vice President  
Dr Katherine Ekert, Executive Secretary  
Mr Matthew Lloyd, Public Officer

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## References

Caulfield MP, Cambridge H, Foster SF et al. (2014) Heat stress: A major contributor to poor animal welfare associated with long haul live export voyages. *The Veterinary Journal* 199:223-228

Farmer B (2011) Independent review of Australia's live export trade. Commonwealth of Australia, Canberra ACT.

Keniry J (2004) Livestock Export Review. A final report to the Minister for Agriculture, Fisheries and Forestry

