



Submission to:
Stage 2: Issues Paper
Review of the Australian Standards for the Export of
Livestock
Technical Advisory Committee

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Introduction

WAFarmers is the state's largest and most influential rural advocacy and service organisation, boasting a membership of over 3,500 primary production businesses and individual farmers including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$7.5 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy.

Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land and the animals that graze and live in it. Agriculture was the largest contributor to national GDP growth in 2016-17, and is the fastest growing industry, particularly driven by the grains and livestock industries.

Executive Summary

WAFarmers welcomes the opportunity to comment on the review of ASEL Stage Two Issues Paper. Together with the comments offered below, we endorse the submission and recommendations offered by ALEC (Australian Livestock Exporters Council).

Livestock producers and exporters are united in their goal of working cooperatively with the Federal Government to provide long-term certainty for the live export industry and for upholding Australia's reputation as a reliable trading partner and exemplar of world's best practice. Open-door communication between industry, the regulator and the Minister is always in the best interests of producers, exporters and our overseas customers.

The recent summer impasse to the live sheep export trade to the Middle East is a real threat to Australia's \$250 million sheep export industry, which is a cornerstone of Western Australia's rural economy.

In addition to the comments specifically relevant to the ASEL review, WAFarmers would also like to recommend consideration is given to the following;

- a. Refinement of the northern summer period set by the McCarthy recommendations, from a set six months to the high summer months of July and August. There must be flexibility around these arrangements.
- b. The McCarthy stocking density requirements currently set for the six month northern summer period should be realigned to suit different geographical port locations dependent upon risk based modelling, rather than being applied to all ships and locations as they are currently set. The current blanket requirement for stocking densities are unrealistic for exporting businesses and may not achieve the welfare standards they aspire too.
- c. The use of new technologies such as biometric tags¹, sensor collars, and environmental (thermal) sensors like the cost effective AcuRite Environment System to monitor temperature and humidity data on a frequent basis.
- d. New research into innovative air conditioner (ventilation) systems like those used on big cruise liners could be investigated. An appropriate air conditioning system could be turned on if exporters are caught in unprecedented situations as a backup system as part of contingency planning.
- e. There is also a need for improved planning and reporting models particularly for weather forecasting and robust contingency planning agreed before sailing, and
- f. Observer reports must be given to the exporter and be made available to the public as soon as they are submitted.

¹The Quantified AgBiometric tag dubbed the 'smart cattle ear tag' was developed in the US and is targeted for feedlot use to identify unwell animals before their condition advances and animals begin to display visual and physical symptoms which would be identified by pen riders. The ground breaking tag monitors body temperature with a laser pointing down the ear canal along with the behaviour of the animal and range of motion for

decreased movement to primarily identify conditions such as BRD. Upon detection an alert with the tag number is sent to the online cloud platform and a LED light in the tag glows on the sick animal (visible even in daylight!) to enable pen riders to quickly identify the animal. Provenance4 is the exclusive Australian distributor and the tags are set for release in early 2019 with the cost estimated at about \$20.00 + per animal. Following US testing, trials conducted on 600 head in 3 feedlots in Victoria, southern NSW and south west QLD have just concluded and early indications show the QA Tags identify sick animals on average at least 7 days earlier than visual observations.

<https://www.youtube.com/watch?v=BDiYkMVgWqc&feature=youtu.be>

ASEL Review Questions and Answers

WAFarmers offer the following comments below to the questions contained in the ASEL Review.

1. Mortality rate changes

It should be recognised the mortality rate for exported sheep and cattle has been steadily declining over the last seven years and are below average production mortality rates. We must allow science to evolve prior to the adoption of complex animal welfare indicators which should supplement mortality based measures.

2. Voyage reporting requirements

WAFarmers support the proposal to standardise electronic reporting forms completed by vets or senior stock persons, but access protocols need to be considered for an array of audiences to prevent unintended consequences. With the use of new cloud based app technologies additional animal health, welfare and environment data can be captured on a frequent basis to improve real time reporting and access. Formal reporting must compliment, not replace good stockmanship observation of the animals on board.

Importantly, reports submitted by on-board observers must be given to the exporter as soon as they are submitted and made available to the public. This is not happening at present.

Livestock producers must take responsibility to ensure livestock offered for export are identified correctly with the right documentation, pregnancy tested and in the right and proper condition for the voyage.

3. Heat stress match to geographical locations

WAFarmers does not agree with the restrictive period of May to October for voyages departing to the Middle East to be appropriate. We believe the high risk months for heat stress for animals being exported is July and August.

We also believe there are different high risk months for different geographical locations and this must be investigated further so that stocking density requirements can be modified to suit locations and ship design accordingly. We support the recommendation to increase dry bulb temperature and humidity readings to three times per day.

WAFarmers supports ALEC's recommendation that caution be exercised in making significant changes to the primary objective in the HSRA model.

We also encourage the committee to explore the possibility of mandating the requirement for all livestock carrying vessels to introduce digital heat mapping devices to accurately monitor the livestock and their environment. This data could be provided daily to the regulator to ensure that all voyages are being carried out safely while maintaining a high standard of animal welfare.

4. Stock Densities

WAFarmers supports the application of allometry to determine stock densities for livestock exported by sea

from Australia. A space allowance that allows all livestock in a pen to simultaneously lie down represents strong grounds for setting densities for live exports from Australia. The agreed allometric K-value which allows livestock to lie down simultaneously is 0.027. We support ALEC's recommendation that on-board stocking densities for all voyages be determined using this k-value. Further, stock densities must be established to suit animal needs, journey times and destinations.

5. Sourcing and preparation of animals

An issue impacting sheep health on-board is shearing wounds and infections so caution is required if shortening the days off shears prior to exporting. WAFarmers supports option one for wool and hair. WAFarmers supports the use of accredited vets for pregnancy testing although we would consider the use of accredited pregnancy testers if there is a shortage of vets, provided a clear assessment/auditing protocol is established and adhered to.

6. On-board resources and management

The most important factor must be to improve planning models prior to sailing particularly for climate predictions, bedding and pad cleaning protocols. Clean automatic - potable - water drinkers monitored for quality is essential and consideration be given to diet changes in accordance with research outcomes to manage manure and moisture outputs.

LiveCorp advised that industry research is currently underway looking at shipboard fodder requirements, including pellet specifications and feed volumes. The project will also conduct a review of pellet manufacture and handling systems to identify ways to minimise pellets fines' (which can cause management and welfare issues on board).

WAFarmers supports option 2 for vets, plus the importance of competency evaluations for on-board stockpersons. The recommended independent observers must not replace the employment of a competent stock people or vets. Consideration could be given to permitting vets to be the independent observers on vessels.

The use of new innovative tags and collar technologies can greatly improve the monitoring of animal welfare indicators. For example, a selected number of animals e.g. 2-3 animal in pens on each deck, could be fitted with a biometric tag or a sensor collar to monitor health and welfare and this data could be cross referenced with airflow and ambient temperature data. On-board medications should be amended to reflect appendix F.

In conclusion

The livestock export trade is critical to the long term sustainability of the Western Australian livestock industry. WAFarmers encourages the use of new science based technologies to define average welfare indicator benchmarks. Complexities such as heat stress versus distress definitions must be carefully investigated using sound scientific principles if we are to determine accurately at what point an animal's welfare is compromised.

McCarthy established a set of thresholds that now needs time for further analysis. We must allow science to evolve prior to moving to complex animal welfare indicators to replace mortality based measures.

There is a real opportunity to investigate new automated monitoring equipment for air flows, humidity, and temperature data, by cross referencing ambient temperature with animal temperatures and ventilation operations and pen densities. New research is needed on ventilations/cooling systems and energy neutral dehumidifiers. We can measure what we can monitor.

