

Wellard Ltd

Stage 1 Submission to ASEL Review Technical Advisory Committee

Wellard Limited (Wellard) is a Licenced Exporter with major commitment to the livestock and livestock export the industries through investments in modern livestock vessels, state of art registered premises and dedicated feed milling facilities.

Wellard has been and major active exporter since the company's formation in 1987.

Over the past 30 years the company has invested in infrastructure that facilitates best practice in animal feeding, handling and transport and is committed to animal welfare through the supply of healthy animals to our markets .This commitment also makes commercial sense to Wellard as our animals are predominantly sold on a Cost Insurance Freight (landed) basis and we are paid for healthy animals that are supplied on a delivered weight basis.

Export standards need to be compliant with current Australian Codes of Practice; harmonized with accepted animal production practice in Australia; and not overregulated to obstruct trade in globally competitive markets.

The current version of ASEL, together with ESCAS, has set the benchmark for welfare in animal transport and handling to the point of slaughter worldwide, and Wellard believes that any changes must be based on sound technical data to enable Australia to maintain existing export markets and our social licence to operate.

Wellard generally supports the submission of the Australian Livestock Exporters Council.

We offer the following broad comments to Stage1 and would seek to expand these and other issues when they are specifically examined by the Technical Advisory Committee. Wellard is committed to continuous improvement and therefore would support changes where improved animal welfare outcomes are clearly demonstrated in the context of production animal management systems.

On this basis Wellard would not support changes in reportable mortality rates as we do not believe that this change will result in improved outcomes. Instead it will increase the work load for the regulator and cost burden on industry. Historically, investigations have not yielded meaningful new information nor resulted in change.

Wellard supports the examination of the complex issue of Stocking density /Ventilation (Pen Air Turnover) and Heat stress issues on vessels and supports the adoption and extensions of metrics utilized in "Hot Stuff" to all markets. Hot Stuff's multifactor approach where multiple contributing factors are assessed to determine stocking densities should be refined with increased emphasis on weather factors and ventilation capacity of the vessel.

Wellard also believes that the phasing out of older vessels under Marine Orders regulations under a continuous improvement program will improve overall animal welfare outcomes. All vessels should be required to meet current regulations within a prescribed time. Where modification of a vessel is not possible the vessel should cease to be approved for trade from Australia.

The terms of reference for the 2012 review of ASEL required stringent justification of changes, including a Regulatory Impact Statement and ratification by the Department's office of best practice.

As many submissions to this review will be made by individuals and organizations that have a stated political agenda to close the trade, it is essential that submissions are evaluated in this context and any changes are technically sound and valid as per the current Terms of Reference: *"clearly analyse the benefits and costs of all proposed options for affected stakeholders in a balance and objective manner with particular regard to the practicalities of livestock management and implications for animal welfare in Australia."*

This is essential as it has been demonstrated as the livestock export industry helps to underpin livestock prices in Australia, especially in times of over-supply, and contributes to the overall viability of Australia's livestock industries. It provides these benefits while also achieving robust animal welfare outcomes.

As the industry has support from both government and opposition any changes introduced should be in the context of improving animal welfare not restricting trade to a point that it is no longer viable in a competitive global environment.



Wellard Rural Exports Pty Ltd

20th March 2018