

27 November 2018

Mr Steve McCutcheon
Chair, Technical Advisory Committee
Review of the Australian Standards for the Export of Livestock

By email: TACsecretariat@agriculture.gov.au

Dear Mr McCutcheon

Supplementary submission - 6,623 community submissions on Stage 2 Draft Report

As the Technical Advisory Committee is aware, community interest in the welfare of exported animals is extremely high. Government has a core obligation to listen to the community and to take their concerns into account when making significant policy decisions.

Recommendation 1 of the Moss Review recognises this, and calls on the Australian Government to ensure “the Australian Standards for the Export of Livestock are reviewed on a regular basis to reflect industry, scientific and regulatory developments and community expectations concerning live animal exports.” The Government has accepted this recommendation in full.

The Government should ensure that the process for the community to have its say is easy and accessible to all members of the community. In our view, the ‘Have Your Say’ platform does not provide a simple process for the community to provide input to the review process. It requires individuals to register their personal details and set up an account with the platform. This may exclude many concerned members of the community who could have reservations about doing this.

To address these concerns, we offered concerned members of the public the option to authorise RSPCA Australia to convey their comments and concerns to the review process as part of a supplementary submission that we would make. The submission these community members have asked us to forward on their behalf is attached.

In total, 6,623 individuals took up this option. The individual particulars of all of these Australians are outlined in the Excel spreadsheet attached to this letter so they can be verified as unique submissions. Note that each submission contains unique content (a personalised message), in addition to the attached. These submissions have been conveyed to the Minister and we now take the opportunity to convey them to the ASEL Review.

We ask the Committee to take the views of these individuals into account in determining the final report and recommendations.

Yours sincerely,



Dr Bidda Jones
Chief Science and Strategy Officer

RSPCA Australia

ABN 99 668 654 249
ACN 163 614 668

P 02 6282 8300
F 02 6282 8311
E rspca@rspca.org.au
W rspca.org.au

PO Box 265
Deakin West ACT 2600



Text of Australian community submission

This year, we've yet again seen the failure of the live export industry to protect Australian animals from abject cruelty on board ships. We've seen animals subjected to cramped, filthy environments, bogged down in their own faeces and without clear access to food and water. The proposed ASEL Standards must do better for animal welfare - Australians will not stand for the cruelty of this industry to continue unchecked, and I'm writing to you to voice my concerns and my expectations for better treatment of animals within the new standards.

Below are the changes I am calling for to be made to the recommended Standards. Detailed evidence to support these changes is provided in the submissions put forward by RSPCA Australia and the Australian Veterinary Association.

Sourcing and preparation of animals

- *No cattle should be exported from southern ports across the equator during the high risk May to October period.*
- *The upper weight limit for all cattle being exported should be set at 500 kg, not at 650 kg, with no exemptions.*
- *Sheep must be rested for at least two clear days after shearing and prior to loading, to overcome the cumulative stress of road transport, handling and shearing and to ensure all shearing wounds are healed.*
- *No sheep, whatever the breed, should be allowed on board a ship with more than 25mm of wool or hair.*

Space allowance for sheep and cattle

- *The space allowances proposed in the draft Standards are still far too small and will force animals to 'time share' their space.*
- *Space allowances must be increased to ensure all animals in a group are able to lie down comfortably at the same time and easily access feed and water, whether they are in a registered premises or on-board ship.*

Heat stress risk assessment (HSRA)

- *The heat stress risk assessment (HSRA) model should be applied to all voyages crossing the equator, at all times of year, from all ports.*

Voyage reporting

- *Voyage reporting requirements should be increased to include more detailed daily welfare monitoring at the pen level, with monitored pens chosen independently of exporters to ensure transparency and accuracy.*
- *Voyage reports should be made publicly available to demonstrate that exporters have nothing to hide.*

Onboard management

- *Ammonia levels must be tracked using ammonia meters, and action taken when they reach harmful levels.*

Onboard personnel

- *There must be at least one accredited stockperson per 2,500 head of cattle and 10,000 head of sheep (not 3,000 cattle and 30,000 sheep), to allow effective monitoring of stock.*
- *A qualified Australian Government Accredited Veterinarian (AAV) must be on board every live export voyage, for supervision and monitoring, as well as an independent auditor with ultimate responsibility for reporting requirements.*

Species permitted to be exported

- *Live export of sheep to the Middle East during the May to October high risk period must cease immediately.*
- *The live export of feral buffalo should be prohibited, as they are unused to human contact and clearly do not tolerate handling and transport without serious welfare compromise.*
- *The export of feral goats, camels and deer should be prohibited, based on previous extreme mortality events and serious concerns over the handling and care of these species.*

I'm joining the RSPCA in calling for these changes to be made, and Minister, I urge you to consider these in your review.