

# The Western Australian Livestock Exporters' Association

CHAIRMAN:  
Mr John Cunnington

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27 November 2018

Mr Steve McCutcheon  
Chair  
Technical Advisory Committee (TAC)  
Australian Standards for the Export of Livestock

Dear Mr McCutcheon,

**Re: - The WA Livestock Exporters Association Submission**  
**Review of the Australian Standards for the Export of Livestock**  
**Response to Draft ASEL Recommendations**

The WA Livestock Exporters Association had a firm belief that the review of ASEL was to be outcome based, premised on strong scientific evidence related to animal welfare, best practice and would take into account the economic viability of the trade. After review of the Draft ASEL Recommendations, we believe that in some key areas of the proposed Draft, these criteria have not been met. Rather, ASEL continues to be input based. Moreover, some important recommendations made by the TAC, which affect the economic viability of the trade, are based on weak or conditional scientific evidence.

The main areas of concern for members are:

- On Board Stocking Densities
- HSRA Application
- Clear days in Registered Premises
- Stocking densities in Registered Premises (sheep)
- On board vessel management including bedding, fodder, stockman and reporting requirements

WALEA has worked in closely with ALEC in preparing their submission and writes today to support the ALEC Response to Draft ASEL Recommendations. If more time is required to further consider these areas, we encourage the TAC to apply for this as the outcome of a rushed response will be detrimental to the future of the trade.

We strongly recommend the TAC to reconsider the areas listed above as per the ALEC submission. It is essential for the viability of the trade that we look to work towards improved animal welfare outcomes through application of proven research and practical application.

WALEA would welcome the opportunity to meet with the TAC in any forum to discuss the submission.

Regards,

John Cunnington  
Chairman  
WA Livestock Exporters Association