

18 October 2021

ASEL Review Team  
Department of Agriculture, Water and the Environment  
**By email: [aselreview@awe.gov.au](mailto:aselreview@awe.gov.au)**

**Animals Australia's submission re feedback on the draft  
*Australian Standards for the Export of Livestock (ASEL) version 3.2***

Animals Australia welcomes the opportunity to provide further input in response to the updating of the Australian Standards for the Export of Livestock version 3.2 (**ASEL 3.2**)

The Department of Agriculture, Water and the Environment ("**Department**") will be aware that Animals Australia has been providing considered submissions and evidence over many years in relation to the regulation of the live animal export trade.

As the Department is also aware, there are many serious risks to animal welfare in the live export trade, and **Animals Australia therefore opposes live export outright** and continues to advocate for a total ban on live animal exports. However, until such time as a ban is in place, we continue to engage in consultation and review processes which may mitigate some animal suffering. It is in this context only that the following input is provided.

We note that the proposed changes are largely administrative and serve to reduce ambiguity and introduce previously proposed technical standards. However, we make the following submissions regarding the following proposed changes to standards:

**1. Definition of 'Animal welfare'**

We support the Department's proposal to align the definition of 'animal welfare' with the OIE Terrestrial Animal Health Code 2021. We welcome the reference to and acknowledgment of the 'mental state' of an animal.

**2. Standard 1.1.3(d)**

The Standard requires individually identified pregnancy testing, except for feeder/slaughter sheep where no animal in the consignment is detectably pregnant (mob-based testing).

We presume this lack of individual testing for sheep (as compared to cattle who are individually identifiable) is because there is *still* no mandate for the individual identification of sheep for live sheep export. This is despite this issue being recognised by previous reviews (including the Farmer Review) as an area of concern regarding traceability of sheep, as evidenced through the recurring breaches of ESCAS each year.

This vague pregnancy identification standard is ineffective, and we continue to see lambs born on ships which result in dire animal welfare consequences.

The issue of individual sheep identification and individualised pregnancy testing is an area requiring the Department's overdue attention.

**3. Standard 2.1.4 and Standard 6.1.7(a)**

We submit that despite the requirement for dogs to be muzzled, we still raise concerns regarding risks to livestock. Noting the Department's comments that there have been several incidences of animals on board vessels that have required treatment for suspected dog bite injuries, we submit that stringent oversight is necessary here to ensure 100% muzzle compliance.

**4. Standard 3.7.9(a) and (b)**

Despite the increase in space allocation for 54kg<sup>+</sup> sheep, we submit that all sheep (particularly sheep penned at registered establishments) should be afforded an allometric allocation of 0.047 (k-value) in order for all animals to simultaneously lie down. A lower k-value makes the problematic assumption that animals will 'time-share' the available space for the purpose of resting, moving around and accessing food and water. This phase of their journey is important regarding rest, and we do not support any measures to decrease space in an already limited allocation ratio even for the smaller sheep.

**5. Standard 5.1.20**

The presence of high ammonia levels in the intensive housing of animals is a key animal welfare issue. We submit that it is unacceptable that the compliance requirement with the ammonia standard is delayed. The regulation of ammonia levels is present in all other codes related to the intensive housing of animals and must be prioritised.

**6. Standard 6.1.24**

We raise concerns that a competent stock handler is only required to accompany flights where animals are accessible. A competent stock handler must accompany all flights – specially to check on the animals during stopovers and also to oversee unloading.

We note the brown text components within the draft ASEL 3.2 document which indicate proposed amendments/concerns raised by stakeholders. We note the Department's intention to deal with these components at a later review. At this juncture we submit that we are not in support of any of the proposed amendments, and we will raise our concerns and submissions in due course.

Please contact me if further clarification is required.

Yours sincerely,



**Glenys Oogjes**  
Chief Executive Officer

