



CATTLE COUNCIL OF AUSTRALIA

SUBMISSION

19 October 2021

Tina Hutchison
Principle Regulatory Officer
Plant & Live Animal Exports Branch
Department of Agriculture, Water and the Environment
Canberra ACT 2601

Via email: aselreview@awe.gov.au

Dear Ms Hutchison

Re: Review of the Australian Standards for the Export of Livestock version 3.2

Cattle Council of Australia (CCA) is the peak industry organisation representing Australia's grass-fed cattle producers. Established in 1979, CCA brings together all state-based farming organisations representing cattle producers in their jurisdiction, associate member organisations with close connections to the cattle industry, and individual cattle producers.

CCA advocates on behalf of the broader cattle industry, including the families and communities whose livelihoods depend on the future of the livestock export industry. In 2019, live cattle exports totalled 1.3 million head, up 20 percent from 2018¹, exported to over 23 countries, at a value of A\$1.9 billion (FOB).

To ensure the integrity of the industry, CCA works to ensure that the live export industry operates under a regulatory framework that is sustainable and fit for purpose. It is essential that Australia has an efficient and clear set of standards that is easily understood and utilised by those in the livestock export industry.

CCA supports the application of the Australian Standards for the Export of Livestock (ASEL) to effectively mitigate any risk of adverse animal welfare outcomes during export and welcomes the opportunity to provide comment to the review of the Australian Standards for the Export of Livestock version 3.2. We provide this submission without prejudice to any additional submission from our members or individual producers and do so to reinforce comments previously articulated in our submissions to the ASEL Review.

CCA and the grass-fed cattle sector work across the industry and governments to effectively mitigate any risk of adverse animal welfare outcomes during export and make the following comments in relation to the definition of near and far markets and pre-export conditioning associated to the number of clear days required in registered establishments.

¹ State of the Industry Report 2020. Meat & Livestock Australia

In relation to the definition of near and far markets, CCA recognises that a line must be drawn to define near and far markets, however we assert that the current parameters have created the perverse outcome of effectively splitting Australia's second largest live cattle market Vietnam into two distinct export regions.

The implications of the current definition of near markets defined as destination ports located south of latitude 15°N, east of longitude 90°E and west of longitude 180°, are that north Vietnam is considered a far market, and south Vietnam considered a near market. As a result of this definition, stocking density requirements are not consistent across Vietnamese ports, and commercially favours southern destinations.

CCA contends that factors outside of geographical location have a larger impact on animal welfare outcomes (type of vessel, departure port etc) and recommends that consideration be given to amending the northern most boundary of a near market to south of latitude 22°N. This amendment would be unlikely to have any statistically significant difference in animal welfare outcomes and would deter domestic transportation from southern to northern Vietnam.

CCA recognises that additional research is necessary to determine the best practises to prepare animals for export to ensure optimal animal welfare outcomes and sustainability of the live export trade; however, notes that several of the investigation reports cited insufficient time at registered premises as a factor contributing to the poor voyage performance². Given the short timeframe cattle are held in registered establishments it is critical that adequate time is available to assess and ensure all animals are feeding. It is questionable whether shy feeders can be identified in anything less than two days and is at significant odds with requirements for buffalo that must be eating and drinking from troughs for a minimum of 21 days pre-arrival and five days in a registered establishment.

It is therefore unclear why there are different requirements for clear days for short and long-haul voyages compared to extended long haul voyages, given the concerns of the Technical Advisory Committee *that most or all short haul voyages depart from northern Australia where travel times to registered premises are longest and, arguably, transport conditions are harshest* (pg. 14).

CCA looks forward to further consultation with Department of Agriculture, Water and the Environment on this important process. If there are any queries about this submission, please do not hesitate to contact our office on 1300 653 038 or email cca@cattlecouncil.com.au.

Yours sincerely



Travis Tobin
Chief Executive Officer

²ASEL Review Technical Advisory Committee 2018, *Review of the Australian Standards for the Export of Livestock: Sea Transport—final report*, Department of Agriculture and Water Resources, Canberra, December. CC BY 4.0.