

18 October 2021

Feedback on the Draft 2021 update of the ASEL Consultation Paper with the responses below.

Via: haveyoursay.awe.gov.au

Organisation name

Sentient, The Veterinary Institute for Animal Ethics

Do you have any comments on the definitions section?

Yes

What ASEL definition?

Animal welfare

What are your comments?

Sentient agrees with the revised definition of animal welfare as: “the physical and mental state of an animal in relation to the conditions in which it lives and dies, as described in the World Organisation for Animal Health (OIE) Terrestrial Animal Health Code 2021.” The acknowledgement of the centrality of mental state in animal welfare should provide an overriding framework for reviewing all standards for the export of livestock. Furthermore, we advocate that the conditions in which livestock live and die within the live export chain provide sound evidence to support a permanent ban on this industry.

Suggested amendment to standard

No Answer

Would you like to give feedback on another definition?

No

Do you have any comments on standard 1?

No

Do you have any comments on standard 2?

No

Do you have any comments on standard 3?

No

Do you have any comments on standard 4?

No

Do you have any comments on standard 5?

Yes

What standard would you like to comment on?

General and all species requirements
Monitoring and reporting requirements

What are your comments about general and all species requirements?

5.1.20 "Ammonia levels in a representative number of pens must be measured daily. If ammonia levels exceed or are likely to exceed 25ppm in any livestock spaces, appropriate reduction measures must be implemented. Compliance with this standard will be delayed until further notice by the department. Rationale: Compliance of the standard is further delayed. Additional research into the risk of ammonia on vessels, appropriate ammonia reduction measures, what constitutes a representative number of pens, and suitable measuring devices is required." It is unacceptable on animal welfare grounds to further delay compliance with maximum possible ammonia levels. Research has shown that sheep find high ammonia levels aversive (Phillips CJ, Pines MK, Muller T (2012) The avoidance of ammonia by sheep. Journal of Veterinary Behavior 7:43-48) and that in some sections of live export ships (such as closed decks and at the front of the vessel and near the engine block on open decks), high ammonia levels, exceeding 25ppm, occur (Pines MK, Phillips CJC (2011) Accumulation of ammonia and other potentially noxious gases on live export shipments from Australia to the Middle East. Journal of Environmental Monitoring. 13, 2798). Increased ventilation,

lower stocking densities and protection from exposure to certain areas of the vessel are recognised as important factors which can be addressed.

Suggested amendment to standard

No further delay to compliance with this standard.

Upload your supporting information

https://s3-ap-southeast-2.amazonaws.com/ehq-production-australia/fc3a09bcb5298aa58e3fb4899b71c22f9f4d4ffd/original/1634532021/49c36f553f54266e0979a4bbae771285_Pines_Phillips_2011_Ammonia_on_board_sheep_export_vessels.pdf?1634532021

What are your comments about monitoring and reporting requirements?

5.6.5 “If a notifiable incident occurs at any time, the exporter must notify the department as soon as possible and within 12 hours. For the export of livestock by sea, a notifiable incident includes: j) an average daily mortality rate that is equal to, or greater than, the notifiable mortality level (in Table 22 and calculated once the final animal is unloaded); [deleted]” The removal of “exceeding the average daily mortality rate as a notifiable incident” is not acceptable. Whilst mortality rate is not a sufficient measure to assess overall animal welfare, notification when the average daily mortality level is exceeded is essential to help identify serious incidents that require urgent attention. The failure to notify such daily mortality rates will justifiably increase public concern about lack of industry transparency and accountability.

Suggested amendment to standard

That these reporting requirements NOT be removed.

Do you have any comments on standard 6?

Yes

What would you like to comment on?

General and all species requirements

What are your comments about general and all species requirements?

6.1.24 Removing the requirement for stock handlers to accompany livestock to oversee their welfare during air transport is unacceptable. The rationale provided is the impact of COVID-19 continuing to impact arrangements for international air travel. This should be taken to its logical conclusion, which is to suspend the export of livestock by this means during the COVID-19 restrictions. Whenever livestock are transported, there are risks that compromise their welfare. Airline personnel cannot be expected to be competent in recognising animals experiencing compromised welfare. The requirement for stock handlers is not questioned for the air transport of valuable animals and so should not be questioned regarding livestock. The designated stock handlers must also be assessed to be competent.

Suggested amendment to standard

That stock handlers continue to accompany livestock exported by air transport during COVID-19 to oversee animal welfare. Failing that, their air transport should be suspended.

Do you have any further comments on the ASEL?

No
