

27 February 2019

Technical Reference Panel (TRP) for the Heat Stress Risk Assessment (Live Animal Exports)
Department of Agriculture and Water Resources
GPO Box 858
Canberra ACT 2602

Dear Panel,

Re: DRAFT Review of Heat Stress Risk Assessment (HSRA) in Australian Live Export

Victorian Farmers Federation (VFF) Livestock Group values the opportunity to comment on the draft recommendations for Heat Stress Risk Assessment (HSRA) released in December 2018.

The VFF is Australia's largest state farmer organisation, representing over 5,000 Victorian farming businesses. Despite farming on only three per cent of Australia's available agricultural land, Victorians produce 30 per cent of the nation's agricultural product. VFF Livestock Group represents the interests of the State's beef, sheep meat, wool and goat producers.

VFF Livestock has been overwhelmed with concerns from our members regarding the HSRA recommendations in the draft report, animal welfare considerations for their livestock throughout the supply chain and the implications for their businesses and the wider industry should the viability of the Australian live export industry be impacted by these proposed changes to legislation.

VFF Livestock acknowledges the high importance of animal welfare in any discussions to enhance industry framework and supports a science-based approach to decision making regarding animal welfare whilst ensuring the productivity and sustainability of the Australian live export trade.

Recommendation 1 of the HSRA draft report outlines a move from a HSRA model based on mortality to one focused on animal welfare. While VFF supports any reform of framework underpinned by good animal welfare outcomes, there is a level of uncertainty on when and how the use of wet bulb temperature (WBT), as a welfare indicator, will be measured on-board vessels.

The draft report attempts to address the issue of heat stress risk to an animal during transit however, the report references the impact to an individual animal rather than a whole consignment when travelling aboard vessels. This argument does not take into account the



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individual differences between animals in response to heat. As noted in the report, there is a lack of data showing the differences in response between an individual animal and a group of animals, frequency of heat load measurements, variable origins and distribution of animals on the ship.

The use of welfare as a heat stress indicator is very subjective, especially when considering the inclusion of panting scores to indicate heat stress on sheep. More objective measurements such as rectal temperatures are not practical and will only increase stress levels for animals.

Recommendations 2 and 3 proposing a 28°C WBT threshold, incorporating a probability of 98 per cent assurance that this threshold will not be exceeded during the journey, has the potential to cease trade for eight months of the year. Implementation of these thresholds makes it virtually impossible for industry to meet these standards, making the trade unviable.

With the lack of sufficient information available and an increased level of guesswork when applying these proposed methods to a realistic setting, this identifies a need for further work to be undertaken in consultation with Industry, to develop a robust heat stress model.

VFF Livestock hold grave concerns not only for sheep producers who benefit from live trade, but also the potential risk to the viability and future of live cattle exports, should these HSRA recommendations be applied to cattle.

Victoria, along with the other southern states contributes 16 per cent to Australia's live cattle trade as determined by Mercado's latest analysis of the live cattle export industry. Consignments from Victoria are often made up a number of livestock from various farms, providing an additional revenue stream for up to 250 farming businesses that are required to make up a shipment.

Australian farmers, who produce red meat under world-leading animal welfare regulations, often in times of environmental hardship, value their livestock and genuinely care for their management and handling throughout the supply chain.

Australian producers have been supportive of improvements to live trade including Industry's self-imposed ban of sheep exports from June to August and the inclusion of Independent Observers on voyages.

If live export is removed from the Australian economy, many families not only on the land but in associated industries including the retail, tourism and transport industries will be left destitute.



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The Australian processing sector is neither equipped nor economically competitive to fill the void should any change of regulation result in a close of trade.

Sheep Producers Australia (SPA), in consultation with other peak industry bodies and State Farming Organisations (SFO's) including VFF, formed a Technical Advisory Group (TAG) to evaluate the science behind the recommendations outlined by the TRP. VFF urges the TRP to carefully study the TAG's findings and develop a more workable solution for industry.

VFF Livestock also encourages the TRP to consider the concerns of Australian farmers, as their future is in your hands.

Yours Sincerely,

Leonard Vallance
President
VFF Livestock Group