



**November 2018**

**AgForce Submission:**

**AgForce Queensland Farmers response to the Draft Report prepared by the Technical Advisory Committee (TAC) on the review of the Australian Standards for the Export of Livestock**



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Technical Advisory Group Secretariat  
GPO Box 858  
CANBERRA ACT 2601

By Post & By Email: [tacsecretariat@agriculture.gov.au](mailto:tacsecretariat@agriculture.gov.au)

Dear Sirs

**Re: Australian Standard for the Export of Livestock (ASEL) TAC Draft Report**

AgForce Queensland Farmers (AgForce) is the peak rural group representing beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2015-16. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. The producers who support AgForce provide high-quality food and fibre to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

AgForce thanks the TAC for providing an opportunity to comment on the draft recommendations. We also appreciate the committee answering our questions and making the secretariat available for further information last week while we were in Canberra.

AgForce has been working across northern Australia with Kimberly Cattleman's Association, and the Northern Territory Cattleman's Association to harmonise response to the draft ASEL report. We provide our full support for the submissions provided by these organisations. In addition, the comprehensive paper put forward by the Australian Live Export Council and research undertaken by Mecardo for the review has been extremely enlightening. We support our peak industry councils' – Cattle Council of Australia and Sheep Producers Australia – responses to the draft recommendations.

Further to these submissions please find the below response to the TAC draft report on ASEL.

Yours faithfully

Michael Guerin  
Chief Executive Officer

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## **Opening Statements**

A vibrant and viable live export trade is important to the Queensland cattle and sheep industry. Equally animal welfare and producers' social licence is important to industry. In achieving this aim AgForce has developed an Animal Welfare Policy to support all our initiatives in this area <https://agforceqld.org.au/intranet/file.php?id=5815>

As a general principle, AgForce confirms its support for measures directly aimed at increasing transparency and building public confidence in relation to live export operations.

The Government's recognition of issues in the regulatory oversight of live exports are welcomed by industry who wish to see animal welfare held to the highest standard. A robust regulator and appropriate outcome focused regulations provides certainty for both the community and the industry.

The McCarthy, Moss and ASEL reviews all highlight different gaps in data and a distinct lack of any other welfare indicators besides mortality. Animal welfare is a subjective assessment and it is important that while new indicators are developed to determine welfare outcomes, the interim ASEL requirements focus on the outcomes the regulation is trying to achieve. Where data is lacking, consideration should be given to other philosophical parameters, but not at the expense of practical operations on a ship.

AgForce is keen to support recommendations that provide both transparency and efficient outcomes to ensure industry can be held in high regard. Queensland's live export trade is primarily short-haul voyages between Townsville and Southeast Asia. There are some movements of cattle from Queensland to the Port of Darwin for export to Southeast Asia as well. The industry is proud of the very low mortality rates and while this is a blunt indicator of welfare it is the standard by which we work. Of the more than 8 million cattle Australia wide shipped to Southeast Asia mid 2004 – 2018, less than 0.1 of 1% have died<sup>1</sup>.

Further, AgForce supports improved regulation that is focused on the outcome of animal welfare, rather than imposing prescriptive additional requirements without clear evidence the change will address the issue. In this regard we support ALEC's call for outcome focused science-based approach to regulatory reform.

This submission will respond to the recommendations made by the Technical Advisory Committee (TAC) with primary focus on stocking density and the use of allometry; the need to differentiate between short-haul and long-haul; the implementation of the heat stress indicators; bedding materials; pregnancy testing; and horn length.

## **Economic Analysis**

The live export trade offers significant value to the Queensland industry and is the sole market for some producers. Live exports represent 6% of Queensland's total turn off and whilst small, the value provided includes providing an alternative market during droughts, setting a market price for light cattle and utilising Australia's competitive advantage in breeding cattle. The industry supports many northern jobs in remote areas including indigenous employment particularly in the Cape. With increasing cost of regulation, the industry is consolidating, with many operators leaving the industry, leading to a decrease in employment opportunities. Further consolidation will reduce competition to a critical level.

Mercado Value Analysis of the Australian Cattle Live Trade Report – Key Highlights Report from November 2018, indicates producers are the primary benefactor of live export trade, retaining between 40%-57% revenue. This is not the case for processing in Queensland, trucking cattle south to slaughter can consume 30% profit<sup>2</sup> and long travel times, poor road conditions can have unique

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<sup>1</sup> ALEC submission in response to Draft ASEL Recommendations 2018 pg 20

<sup>2</sup> CSIRO Transport Network Strategic Investment Tool TRANSIT Application to Northern Australia Beef Road program, April 2016

animal welfare impacts. Furthermore, the additional cost of feeding lighter cattle in dry periods has both an economic and an environmental impact.

The TAC advises their recommendations will add an additional 40 cents a head cost to be absorbed by the exporter. This is a significant stake in the business and any costs added to the shipment through regulation will have a direct impact on producers.

### **Response to TAC Recommendations**

This submission will address recommendations that directly impact Queensland live export industry and defer to other industry reports for the areas outside our jurisdiction. For example, AgForce supports the Northern Territory Cattleman's Association position on Buffalo. Weight may not be the appropriate proxy for age and it is the age of the buffalo that increases the risk. The Kimberly Pilbara Cattleman's Association paper highlights the importance of treating long-haul and short-haul travel separately. The suitability for Bos Taurus cattle exports is covered in Cattle Council's paper and for sheep, please refer to the submission by Sheep Producers Australia.

### **Draft Recommendation 8:**

*That existing weight thresholds for cattle and buffalo be retained, but with outcomes for animals over 500kg monitored over the coming 12 months to assess whether the upper threshold weight should be reduced from 650kg and whether an absolute upper weight limit is necessary.*

AgForce supports the monitoring of upper weight limits with no amendments to the current standard until data is obtained.

### **Draft Recommendations 9 - 12:**

9. *That the term 'clear day' be defined in the standard as a full day (midnight to midnight) during which livestock are not subject to any feed or water curfew and are not handled, treated (including shearing) or moved from their holding pens or paddocks.*
10. *That the standards require sheep and goats to be held at the registered premises for five clear days, irrespective of the location and design of the registered premises, the time of year, or the length of the export voyage.*
11. *That the standards require all classes of cattle travelling on short and long-haul voyages to be held at the registered premises for a minimum of two clear days, irrespective of the location of the premises and the number of loading/discharge ports on the voyage. Three clear days should be required for all classes of cattle travelling on extended long-haul voyages.*
12. *That the standards require buffalo to be held at the registered premises for a minimum of five clear days, irrespective of location of the premises, length of intended voyage or number of loading/discharge ports.*

AgForce supports extending the time in holding pens prior to loading on ships. There is evidence to indicate livestock are social animals and they take time to establish relationships. Additional time pre-boarding will enable the cattle to settle and establish their social order. Cattle Council have maintained this position in all submissions to date.

### **Recommendations:**

13. *That the existing pregnancy-related rejection criteria and pregnancy testing criteria be retained in the standards, other than:*
14. *the testing criteria relating to 'maximum days pregnant' for all livestock exported by sea, which should be amended to apply at the scheduled date of discharge, rather than the scheduled date of departure, to ensure that livestock cannot be exported in the third trimester; and*
15. *the provision relating to Damara female sheep, which should be extended to apply to all female fat tailed sheep.*
16. *That the definition of a competent pregnancy tester be amended to cover persons permitted to undertake pregnancy testing by law in any state or territory jurisdiction, rather than just persons*

*in the Northern Territory and Western Australia. For clarity, the circumstances in which competent pregnancy testers are permitted remains unchanged.*

17. *That the standards allow the department to extend the validity of a pregnancy test beyond 30 days only where necessitated by circumstances outside the exporters control and where the exporter can demonstrate that the extension will not impact on animal welfare outcomes. That decision should be delegated to regional veterinarians, rather than requiring a formal dispensation from the Canberra office.*

AgForce supports the TAC decision to allow the state regulation to define a competent pregnancy tester. AgForce is committed to pregnancy testing reform in Queensland to enable lay testers to become accredited and participate in the market. AgForce is collaborating with MLA researchers in developing a national standard for pregnancy testing and will ensure the standard is reflected in the development of an industry accreditation scheme for lay testers. When the legislation is amended, and the accreditation scheme established, evidence for broadening acceptance of ultrasound will become available and we welcome the TAC offer to review ASEL in light of new data.

**Recommendations:**

19. *That the standards for stocking density in registered premises remain unchanged for cattle and buffalo.*

AgForce supports this recommendation

**On Board Stocking Density**

**Recommendations:**

20. *That the standard adopts an allometric approach for calculating on-board stocking densities for sheep, with a k-value of 0.030 to be applied to the voyages during November to April, and a k-value of 0.033 for voyages during May to October.*
21. *That the standard adopts an allometric approach for calculating on-board stocking densities for cattle, with a k-value of 0.03. Where this approach determines a space allowance that is lower than the current ASEL requirement for a given liveweight and voyage, the higher space allowance will apply.*
22. *That in relation to special categories of livestock, the following approach should apply to on-board stocking densities:*
  - a) *Buffalo: 10% more space than required for cattle.*
  - b) *Cattle and buffalo with horns: 30% more space than otherwise required for cattle and buffalo without horns.*
  - c) *Cattle and buffalo from 650kg and above: additional space allowance as determined by an approved heavy cattle/buffalo management plan.*
  - d) *All pregnant cattle and buffalo: a minimum of 15% more space than otherwise required for cattle and buffalo for a given liveweight and voyage.*
  - e) *Rams and goats with horns: 10% more space than otherwise required for sheep and goats.*

AgForce is concerned the shift toward allometric K value assessment for stocking density lacks adequate scientific vigour to validate the regulatory impost and expense. The existing ASEL stocking density tables are based on the input provided by skilled onboard stock handlers, Australian Government Accredited Veterinarians and available research data. Any move away from these standards should be accompanied by a level of rigour. Further the tables in Appendix D indicate heavier cattle are provided less space than smaller feeder cattle and this is contrary to research which indicates larger cattle need more space. It is not clear how the animal welfare outcomes will be improved by implementing the recommended move to K = 0.03.

Research undertaken by ALEC indicates international stocking densities requirements vary. Some offer slightly more space than others, but no other country uses the allometric framework. This is not to say it will not work, but it does show a lack of ground-truthing to the TAC recommendation for more

space. When international models are converted to a K value, they are well below the TAC recommended  $K = 0.03^3$ .

There is no clear correlation between stocking density and mortality. From the voyage investigation reports for Southeast Asia since 2012, stocking density has not been identified as the main cause of death. Rather other issues including respiratory disease, injuries and 'unidentified causes' are the main reasons recorded for fatalities.

AgForce is not convinced stocking density is the primary issue and there is insufficient data to back increasing space for light feeder cattle transported to Southeast Asia. We recommend that if the TAC wish to trial the allometric model, a more reasonable  $K = 0.027$  is tested and further modelling is undertaken to ensure larger cattle are allocated more space than smaller cattle. Considering the very low mortality rates on short haul, it is difficult to justify ignoring the experience of domestic and international industry in order to satisfy the anthropomorphic arguments of a few not directly connected to the business nor impacted by the increased impost and cost.

### **Heat Stress**

#### **Draft Recommendation:**

23. *That the standards be revised to require the application of an agreed heat stress risk assessment for all livestock voyages that cross the equator, at all times of the year, from all Australian ports.*
24. *That once the (separate) review of the heat stress risk assessment model is completed, the testing criteria in the standards should be revised to support the new model.*
25. *That the period 1 May to 31 October continue to be applied as defining the 'northern summer' in the relevant sections of the revised standard.*

The notion of expanding the Heat Stress Risk Assessment to all livestock and all voyages is conceptually a good animal welfare goal to aim for. However, the parameter for the additional measures, inclusion of different animals and how this will be incorporated into the model needs to be thoroughly researched and tested to ensure the right indicators and remedies are developed to deal with real issues.

AgForce contributed to and supports the Cattle Council of Australia submission to the Heat Stress Technical Reference Panel and while we provide in-principle support for developing new indicators, it is important TAC does not base loading density on subjective measures in ASEL. Accurate recording of subjective measures is critically important if they are to be included in the risk assessment model. Importantly we believe other indicators may enhance and inform the model, but mortality should remain the foundation measure.

The TAC indicates there will need to be further research into the development of an optimal HSRA model which includes all voyages and all livestock. This is likely to take considerable time and financial investment, yet the TAC advice is to apply arbitrary restriction on Bos Taurus cattle exported to China and Japan Recommendation 1. The ALEC submission provides evidence and data that highlights the complexity of implementing the HSRA model to this situation. Is it not clear what indicators/parameters will be used to determine the heat stress risk for these voyages? While the measures are being developed is it reasonable to implement restrictions that may not improve welfare? AgForce therefore requests the TAC test the validity of (Recommendation 1) prior to any decision to implement.

*In addition, Recommendation 23 'that the standards be revised to require the application of an agreed heat stress risk assessment for all livestock voyages that cross the equator, at all times of the year, from all Australian ports assumes the complexity of doing this can be overcome'.*

Perhaps an understanding of the heat risks that arise from this voyage and potential for HSRA modification to address these risks is needed before a standard is included in ASEL?

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<sup>3</sup> ALEC submission pg 10-11

## **Bedding**

The TAC notes that further research is needed on the appropriate volume and type of bedding required to prevent lameness. The TAC also notes the difference between long-haul and short voyages and the need to review the bedding requirement in light of further research.

### **Recommendation:**

28. *Is supported*

### **Recommendation:**

29. *That the standard require bedding management, including deck wash downs and replacement of bedding materials, to be sufficient to ensure good welfare outcomes for livestock, in particular, minimising slipping and abrasions, lameness, pugging and faecal coating.*

AgForce supports this recommendation as it focuses on the outcome managing lameness, slipping etc. This is as far as ASEL needs to go unless independent observers identify there are clear reasons for prescriptive measure.

32. *That the standard requires that cattle and buffalo on all voyages are provided with sufficient sawdust, rice hulls or similar material to be used for bedding at a minimum rate of 4 tonnes per 1000m<sup>2</sup> per application, with a minimum of 4 tonnes per 1000m<sup>2</sup> provided after each washdown.*

This recommendation is not supported and is unnecessarily prescriptive. If the aim of bedding is to minimise leg and feet injuries this will be best managed by the onboard AAV and stock handlers. Requiring set volume of bedding will increase costs, both environmental through waste and economic. It will also increase biosecurity risk with no clear improvement on leg and feet health/comfort. The AAV submission to the TAC did not make any statements about need for increased bedding or issues with lack of feed provisions.

It is difficult to be prescriptive about the nature and provision of bedding. Materials that can be easily sourced near southern ports may not be readily available from northern ports for example rice hulls and wood shavings. The Northern Territory Cattleman's Association and the Kimberly Cattleman's Association have investigated availability of rice hulls and sawdust in the north and both would need to be transported from the south. If the intended outcome is to manage leg and feet health, then every opportunity to improve the design of the vessel and improved flooring should be encouraged.

### **Recommendations:**

35 – 40 regarding feed are supported.

### **Recommendations:**

41 – 43 are supported however, recommendation 44 may not be achievable on smaller boats undertaking short haul journeys. It is not clear why there is a need for additional personnel considering vets are highly qualified.

## **Horn Requirements**

AgForce is concerned there are unintended consequences of setting horn length at 12 cm and supports the Cattle Council's Submission recommending an increase in length. Bos Indicus cattle with stumpy horns pose no risk, yet there are reported incidence of animal welfare breaches with exporters tipping these cattle prior to export. There is a significant fee charged to the producer if the cattle require tipping one producer indicated \$50 per head. This activity is revenue raising and unnecessary. AgForce requests the TAC consider increasing horn length or accommodating other measures to overcome this issue.