[date]

**Submission to the Review of the Australian Standards for the Export of Livestock (ASEL)**

Dear Committee Members,

This year, we have yet again seen the failure of the live export industry to protect Australian animals from abject cruelty on board ships. We’ve seen animals subjected to cramped, filthy environments, bogged down in their own faeces and without clear access to food and water.

The proposed ASEL Standards must do better for animal welfare – Australians will not stand for the cruelty of this industry to continue unchecked, and I’m writing to you to voice my concerns and my expectations for animal welfare within the new standards.

*As an animal lover I have been appalled, distressed and disgusted that the Australian Government has shown so little concern for basic decency that they have allowed animals to be mistreated in this way. It does not represent my beliefs or attitudes as to how a modern, compassionate, forward thinking country should behave.*

*It is my belief that animals should be transported only in RSPCA approved conditions. Anything less is unacceptable.*

*It is my belief that the whole process should be overseen by independent, conscientious people who have the animals’ best interests at heart.*

*There should be checks and balances along the way to make sure the air conditioning and ventilation is working, and strategies to manage it should these systems break down.*

*At the end of the trip the animals should only be unloaded to registered and properly sanctioned transport to people who know how to manage animals humanely and follow acknowledged world’s best practice systems to keep the animals calm and relaxed.*

*Should any official fail in their duty to protect the animals there should be strong penalties applied, not some ‘slap on the wrist’ which is completely unsatisfactory. It should be both a punishment and a deterrent.*

*The people charged with protecting the animals’ rights should be independent of government, farmers and purchasers, because I have little faith in human nature.*]

Whenever any animal is subjected to live export from Australia by sea, it is my expectation their treatment and conditions will meet evidence-based animal welfare standards to protect them from harm.

Although the recommendations put forward in the ASEL Review Draft Report go some way towards this, my submission is that further changes are needed to bring these standards up to scratch, as I have outlined below. Detailed evidence to support these changes is provided in the submissions put forward by RSPCA Australia and the Australian Veterinary Association.

**Sourcing and preparation of animals**

* I support the recommendation to prohibit the export of pregnant *Bos taurus* cattle during the high risk May to October period. However, the risks are too great to allow cattle of any class to be exported from southern ports across the equator at this time.
* As the body mass of adult cattle increases, so does the risk of injury and susceptibility to heat stress during export. To mitigate this risk, evidence shows that the upper weight limit for all cattle should be set at 500kg, not at 650kg, with no exemptions.
* I agree with the committee’s conclusion that sheep need time to rest and recover from shearing before they are loaded onto the vessel. But one clear day is not enough – sheep need at least two clear days to overcome the cumulative stress of road transport, handling and shearing and to ensure all shearing wounds are healed before loading.
* No sheep, whatever the breed, should be allowed on board a ship with more than 25mm of wool or hair. We have seen the devastating effects of sheep coated in slurry succumbing to heat stress; this includes hair sheep as well as Merinos and every possible step must be taken to avoid this from recurring.

**Space allowance for sheep and cattle**

* I support the recommendation that the ASEL adopt a science-based approach for calculating on-board stocking densities for sheep and cattle based on allometry. However, the space provided must allow all animals to lie down comfortably at the same time and easily access feed and water, whether they are in a registered premises or on-board ship. This is a basic, necessary requirement irrespective of other environment factors such as heat load, yet the current recommendations do not provide sufficient space to meet these needs.
* Sheep and cattle normally spend 60-80% of their time lying down, and do so at specific times of day to aid rumination as well as to rest. When given insufficient space, animals do not ‘time share’ lying time; instead, the less dominant individuals in the group are forced to spend more time standing up until they are too fatigued to do so.
* Preventing sheep and cattle from lying down whenever they need to do so is cruel. If you are to regain community support for the live export trade, I urge you to follow the RSPCA’s recommendations when it comes to space allowances.

**Heat stress risk assessment (HSRA)**

* I support the recommendation that the HSRA model be applied to all voyages crossing the equator, at all times of year, from all ports.

**Voyage reporting**

* I support the recommendation to increase voyage reporting requirements to include more detailed daily welfare monitoring at the pen level, but the selection of pens must not be decided by exporters. Welfare monitoring must be accurate and transparent – there must be no opportunity for exporters to avoid reporting poor outcomes.
* Voyage reports should be made publicly available to demonstrate that exporters have nothing to hide.

**Onboard management**

* I am very concerned that no standard has been proposed to require corrective action to be taken when ammonia levels reach harmful levels. There is no need to wait for more research to implement this standard. Ammonia meters are widely available and used on farms and should be deployed during daily monitoring.

**Onboard personnel**

* I support the recommendation that the number of stock handlers should be in proportion to the number of animals loaded, but the requirement should be for least one accredited stockperson per 2,500 head of cattle and 10,000 head of sheep (not 3,000 cattle and 30,000 sheep), to allow effective monitoring of stock.
* Veterinary supervision is necessary on every live export voyage, no matter its duration. Only AAVs are trained to diagnose disease and other health problems and implement appropriate treatment. The standards should require an independently appointed AAV to accompany all live export consignments. All journeys should also include an independent auditor with ultimate responsibility for reporting requirements.

**Species permitted to be exported**

* **Sheep** - the evidence is clear that, regardless of any proposed changes the standards, sheep will suffer heat stress during voyages to the Middle East in the May-October period. I urge you to ensure that the standards explicitly exclude the long-haul export of sheep during this period.

*As previously stated, I believe the RSPCA and animal organisations should be the ones to determine the conditions under which it is allowed to send animals on ships.*

*I see this state of affairs as a stop- gap in the couple of years it may take to completely phase out this industry. In this day and age of refrigeration and freezing subjecting animals to these conditions so far from their natural state in unacceptable and unnecessary. I would urge you to please take notice of my thoughts and recognise that while not everyone can make a submission, many people think like me.*