20 November 2017

Steve McCutcheon

Chair, Technical Advisory Committee

Review of the Australian Standards for the Export of Livestock

Department of Agriculture and Water Resources

GPO Box 858

Canberra ACT 2601

Dear Mr McCutcheon

*Stage 2 draft report: review of the Australian Standards for the Export of Livestock*

I was dismayed in the last few weeks to again see live sheep trucks hurtling down the roads of Fremantle, where I live.

As a resident of this port city, I can look from my driver's seat into the eyes of these animals, who are dirty, exhausted, and distressed. Many are already injured because their legs slip out of or get hooked over the guardrails, and this is only on the first awful leg of many, by truck and ship, to their eventual deaths overseas.

The Australian primary resources sector can and must do better.

Ultimately the entire live-export trade must end.

Meanwhile, changes must be made to the standards, and adherence to the standards must be enforced. That means the agencies charged with verification and enforcement must be adequately resourced and empowered to fulfil their duties under the law.

The proposed ASEL Standards must do better for animal welfare. Below are the changes I am calling for to be made to the recommended Standards. 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

* No cattle should be exported from southern ports across the equator during the high risk May to October period.
* The upper weight limit for all cattle being exported should be set at 500 kg, not at 650 kg, with no exemptions.
* Sheep must be rested for at least two clear days after shearing and prior to loading, to overcome the cumulative stress of road transport, handling and shearing and to ensure all shearing wounds are healed.
* No sheep, whatever the breed, should be allowed on board a ship with more than 25mm of wool or hair.

Space allowance for sheep and cattle

* The space allowances proposed in the draft Standards are still far too small and will force animals to ‘time share’ their space.
* Space allowances must be increased to ensure all animals in a group are able 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.

Heat stress risk assessment (HSRA)

* The heat stress risk assessment (HSRA) model should be applied to all voyages crossing the equator, at all times of year, from all ports.

Voyage reporting

* Voyage reporting requirements should be increased to include more detailed daily welfare monitoring at the pen level, with monitored pens chosen independently of exporters to ensure transparency and accuracy.
* Voyage reports should be made publicly available to demonstrate that exporters have nothing to hide.

Onboard management

* Ammonia levels must be tracked using ammonia meters, and action taken when they reach harmful levels.

Onboard personnel

* There must be at 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.
* A qualified Australian Government-Accredited Veterinarian (AAV) must be on board every live export voyage, for supervision and monitoring, as well as an independent auditor with ultimate responsibility for reporting requirements.

Species permitted to be exported

* Live export of sheep to the Middle East during the May to October high risk period must cease immediately.
* The live export of feral buffalo should be prohibited, as they are unused to human contact and clearly do not tolerate handling and transport without serious compromise to their welfare.
* The export of feral goats, camels and deer should be prohibited, based on previous extreme mortality events and serious concerns over the handling and care of these species.

I’m joining the RSPCA in calling for these changes to be made, and I urge you to consider these in your review.

Thank you for the opportunity to submit.