Steve McCutcheon

Chair

Technical Advisory Committee

Dear Mr McCutcheon

**Review of the Australian Standards for the Export of Livestock**

I thank the Committee for the opportunity to comment on the Australian Standards for the Export of Livestock. The amendments will dramatically improve the lives of animals and introduce desperately needed transparency and accountability.

I first of all ask you to please consider a ban on the export of live animals.

The recent incident of deaths at sea is not isolate or anomalous. There have been numerous reported incidents of livestock deaths and of cruelty in the slaughter process where brutal killings of Australian animals happens outside of accredited facilities.

I encourage you to work with international governments and farmers to transition to a chilled meat trade.

While this industry has repeatedly shown an inability to live up to community expectations, I do at a minimum, call for the below changes to be made to the recommended Standards.

**Sourcing and preparation**

* No cattle should be exported from southern ports across the equator during the high risk May to October period.

Dangerous heat load may occur for transported livestock in any area experienced high sustained environmental temperatures. This may occur in many areas of Australia, particularly northern Australia during the southern hemisphere summer (Blackshaw and Blackshaw 1994) and has been documented for exported sheep and cattle during the northern hemisphere summer, at ports in the Persian Gulf (More *et al.* 2003; Stinson 2008).

* I agree that sheep need time to rest prior to boarding the ship. This period should be increased to two days to ensure sheep have time to recover from the stress of shearing and transport.

**Space allowance**

* I support the recommendation that the ASEL adopt a science-based approach for calculating on-board stocking densities. Space must be sufficient to allow animals to lie down simultaneously, access food and water, and decrease the chance of heat stress. These are basic requirements that must be met to ensure we do not see yet another failure of the live export industry resulting in mass deaths on voyage.

**Heat stress risk assessment (HSRA)**

* I support the recommendation that the HSRA model be applied to **all** voyages crossing the equator, with risk setting relating to heat stress not mortality.

The current setting used is a 2% probability of a 5% mortality due to heat stress. This setting was chosen by industry. It has recently been suggested that the risk setting should be replaced by the likelihood of an animal experiencing heat stress, not mortality, in order to achieve improved welfare outcomes (McCarthy 2018).

**Voyage reporting**

* Voyage reporting requirements must be updated to include overall welfare rather than just mortality. Reporting must accurate and transparent with no opportunity for exporters to avoid reporting negative outcomes.

It has been argued by authors of several reviews that animal welfare monitoring should not be solely restricted to addressing mortalities. Rather, it has been proposed that animal welfare management should be based on ensuring the physical and mental welfare needs of exported animals are addressed throughout the entire journey (Foster and Overall 2014; Wickham *et al.* 2017; Australian Veterinary Association 2018). Indeed, McCarthy (2018) recently recommended that the industry moves away from using mortality as a measure to a focus on measures that reflect the welfare of the animal. Recording on-board mortality and non-compliance with ASEL (Commonwealth of Australia 2011) only indicates problems retrospectively (after any events) and does not identify areas where conditions or management decisions could be modified, or welfare improved prospectively. Thus, identifying potential issues earlier may potentially avoid negative incidents and provide solutions through pre-emptive modifications and adaptive management.

**Onboard management**

* Ammonia levels must be tracked with steps implemented to limit harmful levels.

Ammonia is a highly irritating alkaline gas that has been associated with adverse effects on sheep on transport vessels (Costa *et al.* 2003; Tudor *et al.* 2003; Phillips *et al.* 2010; Phillips *et al.* 2012a, 2012b; Pines and Phillips 2011, 2013; Zhang *et al.* 2017; Zhang *et al.* 2018; Zhang and Phillips 2018b). Ammonia accumulates in livestock accommodation, which adversely affects feed intake, inflames mucosal tissue and causes coughing, sneezing and lacrimation (tears to flow from the eyes; Zhang *et al.* 2018). Ammonia can be produced in livestock bedding when organic matter ferments. An early study recommended the monitoring of ammonia levels on-board live export ships, and that ammonia levels below 20 ppm (parts per million) should be the target during live cattle export (Tudor *et al.* 2003). A subsequent study used on-board monitoring and animal experimentation to recommend that the maximum exposure limit for sheep and cattle should be 30 ppm (Phillips 2007).

**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.
* **Feral buffalo** - the Draft Report indicates there are significant and serious animal welfare and mortality issues with the export of feral buffalo. It appears that these problems have gone unidentified and unaddressed because of the absence of any independent or veterinary oversight. Feral buffalo are completely unused to human contact and clearly do not tolerate handling and transport without serious welfare compromise. These problems carry over into importing countries to the point of slaughter. I urge you to amend the standards to prohibit the live export of feral buffalo.
* **Feral goats, camels and deer** – none of these species have been exported by sea in the past three years or more. Previous extreme mortality events have indicated that goats cope poorly at sea and similar concerns exist for deer and feral camels. There is insufficient expertise and infrastructure in the live export supply chain to manage these species at sea and such export is unnecessary when air transport is available as a safer cost-effective option. I urge you to amend the standards to prohibit the live export of feral goats, camels and deer.