20th November 2018

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

Dear Committee Members

Australian animals experience abject cruelty aboard live-export ships. We have documented proof that animals are kept in hot, cramped, filthy conditions, bogged down in their own faeces and without clear access to food and water.

Sadly, it seems that live export will not cease in the near future. Therefore, the proposed ASEL Standards **must** do better in assuring animal welfare. As a concerned Australian, I implore you not to allow the cruelty of this industry to continue unchecked.

And I will continue to voice my concerns and my expectations for animal welfare within the new standards being proposed.

I began thinking about live exports more than a decade ago, when I witnessed the suffering of sheep being shipped to ports in dreadful cramped conditions in reeking four-tiered lorries. Subsequently, I visited the Port of Fremantle to see for myself how these gentle creatures were loaded onto the ships – very roughly and with no consideration for their comfort at all. Since then, of course, there have been innumerable exposés of the appalling conditions aboard those ships and the vile acts of cruelty sheep, cattle and other animals endure when they reach their port of call … if they survive the journey at sea. Despite what a lot of farmers, many in government and the industry itself maintain, sheep, cattle and other animals are neither stupid nor unfeeling, and none should have to experience such prolonged suffering. I'm neither a vegan nor a vegetarian, but to my mind the live export trade carries a heavy burden of shame, as do all Australians while it is allowed to continue.

Until live export is banned for good, the treatment of – and conditions experienced by – any animal unfortunate enough to be transported live from Australia by sea must meet evidence-based animal welfare standards to protect them far more than occurs at present.

Although the recommendations put forward in the ASEL Review Draft Report are a step in the right direction, I feel more comprehensive changes are necessary to maintain a bare modicum of humanity towards these creatures.

Detailed evidence to support the changes outlined below has been provided in submissions put forward by RSPCA Australia and the Australian Veterinary Association, and they are the very least I would expect to improve animal welfare in this industry.

**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 but consider the risks too great to allow cattle **of any class** to be exported from southern ports across the equator during this period.
* 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 500 kg, not 650 kg, 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 a 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 that all shearing wounds are healed before loading.
* No sheep, whatever the breed, should be allowed on board a ship with more than 25 mm of wool or hair – this includes hair sheep as well as Merinos. We have seen the devastating effects of sheep coated in slurry succumbing to heat stress, and every possible step must be taken to avoid this.

**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 the ship. This is a basic, necessary requirement irrespective of other environment factors such as heat load, yet the current recommendations do not allow for 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 inherently cruel. If you must continue to permit 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 that voyage-reporting requirements be more stringent in detailiing daily welfare monitoring at the pen level. That said, selection of pens must not be left to exporters to decide; they have already proved they do not have the animals' welfare at heart. Welfare monitoring must be accurate and transparent, allowing no opportunity for exporters to avoid reporting poor outcomes.
* Voyage reports should be publicly available, to demonstrate that exporters have nothing to hide.

**On-board management**

I am most concerned that there is so far no standard that requires corrective action to be taken when ammonia levels reach harmful levels. No further research is required to implement this standard. Ammonia meters are widely available and already used on farms; they absolutely must be deployed during daily monitoring.

**On-board personnel**

* I support the recommendation that the number of stock handlers be in proportion to the number of animals loaded, but that requirement should be for, at the very 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 vital 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 – and every journey 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 to 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 their welfare being seriously compromised. These problems carry over into importing countries to the point of slaughter. I urge you to **please** amend the standards to prohibit the live export of feral buffalo.
* **Feral goats, camels and deer** – none of these species has 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 and cost-effective option. I urge you to amend the standards to **prohibit** the live export of feral goats, camels and deer.

Finally, it is my expectation that, on completion of this review process, the Australian Government will act to immediately implement the revised standards so that exported animals can benefit from any improvements to animal welfare as soon as possible.

In the words of someone far cleverer than me, "The assumption that animals are without rights, and the illusion that our treatment of them has no moral significance, is an outrageous example of Western crudity and barbarity. Universal compassion is the only guarantee of morality" ~ Arthur Schopenhauer.

I await the results of the review and implore the committee to improve standards for all animals subject to this cruel and inhumane 'trade'.

Kind regards

Josephine Norman