



19 September 2018

Mr. Steve McCutcheon  
Technical Advisory Committee for the Review of the Australian Standards for the Export of  
Livestock (ASEL)  
Department of Agriculture and Water Resources  
GPO Box 858  
CANBERRA ACT 2601

Dear Mr. McCutcheon

### **Review of the Australian Standards for the Export of livestock (ASEL)- Stage 2**

Thank you for the opportunity to provide a submission into the ASEL Review – Stage 2. Sheep Producers Australia (SPA) is the peak industry organisation for sheep and lamb producers. It works to enhance the industry's productivity, profitability and sustainability. SPA appreciates this is the second stage of the review process, however much of our previous submission (to Stage 1) gives context and informs our standpoint for many of the areas raised in the Discussion Paper for Stage 2, and members of the Technical Committee are encouraged to read this document.

With reference to the particular points made in the current Discussion Paper, SPA encourages a common-sense test approach to the report, that will assist in ensuring animal welfare standards are acceptable (to both the regulator and community at large) as well as allowing a sustainable industry to re-emerge following the current upheaval.

There are many technical areas that are undergoing more research or are best answered by other stakeholders, that will not be addressed in this submission. SPA is however, supportive of the research undertaken by Livecorp, which has been partly funded by sheep industry levies.

SPA is supportive of space allowance that allows all livestock in a pen to simultaneously lie down. The research presented to SPA by Livecorp, has a recommended allometrically calculated k-value of 0.027, which allows sufficient space for animals on long haul voyages. SPA supports the use of this value in calculating stocking densities. The only case where this should be disregarded, is when the Heat Stress Risk Assessment (HSRA) for a voyage determines that more space is required for each animal. For extended long haul voyages, an additional space allowance of 10% is recommended.

For other issues within the Discussion Paper, SPA would comment as follows:

#### **1. Voyage Reporting**

(Page 16, Point 3) The question is raised regarding whether reports should be made public. SPA considers that reports should be made public, as part of the improved transparency that the industry requires. It is important that when statistics are released, that an explanation of



any 'anomalies' is also reported to ensure context is given to the conditions experienced on each voyage.

(Page 16, Point 4) The desirability of Real Time Monitoring is discussed. This would be of limited value. Whilst initially it would seem to assist in providing a further element of transparency that the industry requires, it can lead to particular situations being taken out of context.

An example would be a temporary high stocking rate to alleviate a vessel safety problem, or allowing an issue to be solved in pens with bedding needed to be replaced. The event in isolation may be viewed as a breach of conditions, however the event can be short term and allow a better welfare outcome for the animals.

Real time monitoring may discourage irregular practices that allow better animal welfare outcomes. It is up to the Government nominated representative (the Veterinary Officer) to ensure that all decisions being made, rate animal welfare as the first priority.

## 2. Cost of Additional Requirements

(Page 16, Point 7) The discussion, for any changes to practices within a supply chain, will turn to who bears the cost. Initially it is the shipping line and exporter that will bear the cost, through the increased labour requirement, additional infrastructure, and contracting arrangements between the two parties.

In reality it is the sheep producer that will pay for any additional requirements placed upon the industry. Every exporter continually runs the equation:

**Sales price less Margin less Transfer Costs equals Procurement Value**

Transfer costs will always include any additional cost placed on the shipping process. It is true that margins can be squeezed, however any additional structural costs will be applied to the procurement of stock. The farm gate is where the majority of any additional costs will rest, given a competitive environment in the export market.

## 3. Heat Stress Risk Assessment (HSRA)

(Page 18, Point 1) The question is posed, as to whether some destinations should have risk assessments and others not have this requirement. SPA considers that all major sheep destinations (Middle East) should have an HSRA, as major destinations will require crossing the equator at some point in the voyage. SPA is fully supportive of all decisions relating to heat stress being made on sound scientific grounds.

## 4. Minimum Time at a Registered Premises

(Page 21, Point 1 and Page 24, Point 1) SPA appreciates that sheep sourced from different regions will have had different levels of exposure to different types of feed rations and feeding systems. SPA does not see any need to change the current requirements for time spent at a Registered Premises. Those animals that have been raised on properties where sheep feeders are in place will adapt very quickly, whereas those from pastoral zones will take much longer to accept using feeders and the rations.

SPA contends that the focus needs to be placed on identifying those animals that are considered 'shy feeders' or not accepting the ration, rather than setting arbitrary time frames. Sheep producers already identify shy feeders through simple methods (such as

placing a food dye in the ration), and expect acceptable methods for fast identification within the live export system.



Shy feeders must be clearly identified and either removed from the system (for live export) or placed in a remedial area where they are allowed a longer period to adapt. No animals should be sent on a live export vessel unless they are able to be kept at an acceptable level of condition (already set out in the Standards), before and for the duration of the voyage.

**SHEEP  
PRODUCERS  
AUSTRALIA**

#### 5. Pregnancy Testing Requirements

(Page 27, Point 3) It is an accepted industry practice that pregnancy testing can be carried out by any competent pregnancy tester. The level of training and the competency of the operator, should be assessed by the Government appointed veterinarians (noting that courses are run by Australian Government agencies). It is accepted by sheep producers that pregnancy testing is carried out by appropriately trained individuals, and that veterinary training is not required to complete the task to a skill level acceptable to producers.

#### 6. Role of Accredited Vet and Independent Observer

(Page 40, Point 4) SPA considers the role of the Veterinarian on the vessel, as vital. They are not only the Government Representative aboard the vessel, but perform a hands-on role in managing the welfare of the animals.

SPA considers that the Veterinarian on a vessel should perform a similar role to that of the Government appointed vet at an abattoir. In an abattoir setting the Vet has the final word on the majority of regulation surrounding the handling of animals and hygiene on the plant.

SPA believes the Government appointed veterinary officer, is the best person to both report on the performance of a voyage (with regard to animal welfare standards) as well as assist and advise those handling and managing the animals.

There is limited capacity for vessels to accommodate crew and stockpersons and other relevant parties. An Independent Observer, would monitor conditions and animal welfare, without participating in completing the tasks required for a successful voyage and outcome for the animals.

SPA appreciates that consideration of whether there should be an Independent Observer aboard a vessel or not, is outside the scope of this review. SPA would, however like it to be noted that it is preferable to have another stockperson on the voyage to assist with animal welfare issues, with observation tasks to be completed by the Veterinary Officer, that is employed solely by the Government.

Your sincerely,

Graham Smith  
Chief Executive Officer  
Sheep Producers Australia



## Background

Sheep Producers Australia (SPA) represents sheep and lamb producers in Australia and provides a mechanism to bring a diverse range of issues and needs to the policy making process. SPA draws on many formal and informal processes to achieve this. Principal amongst these is input from the state farming organisations, which have extensive networks within their jurisdictions.

As the recognised peak body for the sheepmeat industry under the *Australian Meat and Livestock Industry Act 1997* (the Act), SPA sets the strategic objectives to be pursued by the levy funded organisations Meat and Livestock Australia (MLA), Animal Health Australia (AHA), and the National Residue Survey (NRS), examining and approving their programs and budgets. We are involved in priority setting for industry research and development and marketing activities both domestically and internationally as set out in the Red Meat Memorandum of Understanding (MoU). Under the MoU, SPA assesses the performance of services delivered by expenditure of lamb and sheep levies.

The objects of SPA are;

- to represent and promote the interests of Australian sheep and lamb producers;
- to carry out activities necessary for the advancement of the sheepmeat and live sheep export industries;
- to collect and disseminate information concerning the sheepmeat and live sheep export industries;
- to co-operate with industry stakeholders and organisations at the state and national level and overseas;
- to maintain interaction and co-operation with its Members, relevant Government departments and authorities at Federal, State, and local government levels, and with other relevant industry organisations;
- to promote the development and resourcing of the agricultural and pastoral industries of Australia;
- to act as the Prescribed Body for the sheepmeat industry in Australia within the Red Meat Industry MoU under the Act;
- to oversee the implementation of the Sheepmeat Industry Strategic Plan (SISP).