Feedback on the proposed new format of the standards

Please include responses to these questions in your submission:

Is the proposed version clear and concise?

Yes, the proposed version is mostly clear and concise. However, in some instances, terms such as 'regularly' (1A.1), 'suitable' (1A.3) and 'sufficient' (2A.2c (i)) are used which is open to interpretation. The use of these terms should be accompanied by either defined values, reference to sections of the document that elaborate further, or reference to external documents that have defined values. One example is the use of the word 'sufficient drainage' under 2A.2c (i). What is 'sufficient'? If 'sufficient' relates to 2A.2d (i) and (ii), then this should be referred to in 2A.2c (i) for clarity. If 'sufficient' does not relate to 2A.2d (i) and (ii), then it is not adequate to have 'sufficient drainage' as a standalone comment with no guidelines on what constitutes 'sufficient'.

Are any regulatory requirements missing?

Yes. There are no requirements included that address the disposal or storage of livestock who have been euthanised to prevent impact on remaining stock.

Are any regulatory requirements duplicated?

There is some duplication of information but it is necessary for clarity.

Can the proposed new format be improved? Where? How?

The point and/or breakdown of 'Overarching requirements' should be mentioned under 'Scope and General' like done for 'Outcomes', otherwise it is unexpected.

Feedback on the content of ASEL

Please include responses to these questions in your submission:

What are the three most important issues for the committee to consider as part of this review? Why are these issues important? Does information exist to support a change?

Issue 1

Section 3B.7 should include requirements for the storage or disposal of euthanised animals throughout the consignment so as not to impact on remaining stock.

Issue 2

Section 4D.2 states that Records of and animal's treatment history must be kept for at least two (2) years after the date of export. Two years is too short, and should be increased to at least 10 years to allow sufficient access to information should an investigation into the live export industry be needed.

Issue 3

Both 2B.1a and 3B.2a (ii) state that livestock must be offered water and feed as soon as possible within 12 hours, and Appendix B show water deprivation times that exceed a day! This may be acceptable for food, but water should be offered much sooner than 12 hours in any instance, and water deprivation in Appendix B times should be drastically reduced.

Issue 4

Under 1A.3 Animals have a suitable health and welfare status for export, all livestock, except deer, are given the same 14 day timeframe for weaning prior to souring for export. This is presumably due to a lack of studies investigating what the suitable timeframe for weaning is for each livestock animal. This timeframe my not be suitable as a blanket rule.

Are you aware of any emerging research, data or scientific evidence the committee should consider in planning future review stages?

For example, you may know of a research project about the air quality on board livestock vessels that will conclude by the end of 2018. Providing us with these details can help the committee schedule its work plan so that the review stage that considers air quality may include the research outcomes of that project.

Renee Willis BVSc,

Title: Animal Welfare Monitoring in the Australian Live

Export Industry

Animal welfare monitoring is become increasingly recognised as an essential aspect of ensuring the sustainability of livestock production systems. Society expects greater ethical responsibility for the welfare and humane treatment of animals managed under intensive, large-scale production and transport systems. The livestock production sector recognises that it must meet the demands of the community and show that the welfare needs of animals are being considered. Monitoring and reporting welfare standards will allow producers and operators to express industry awareness and incremental progression. The live export industry requires a comprehensive system of welfare monitoring. Current reporting processes do not meet the community's expectation for knowledge regarding industry practices. Improved monitoring will be a challenge but reporting of welfare across the whole live export supply chain can lead to a better understanding of the welfare standards within the industry. The development of a comprehensive assessment protocol will allow quality control, help to mitigate risk and provide stakeholder and community confidence. Accurate monitoring of industry practices will enable benchmarking of standards and motivate ongoing improvements in welfare performance.

This project will propose a list of welfare indicators relating to environmental-, resource- and management-based inputs, as well as outputs relating to animal health and behaviour. This list of indicators will be designed to assess sample groups of cattle and sheep at all levels of the supply chain; on farm, feedlot, on ship and at a foreign feedlot, in a practical and efficient manner. The study will trial data collection techniques, sampling strategies and test for inter-observer reliability for a welfare indicators protocol. In addition, we propose to collect information regarding the level of training and experience of stockpersons and survey industry attitudes to animal welfare.