

20 March 2018

TAC Review Secretariat
Department of Agriculture and Water Resources

TACsecretariat@agriculture.gov.au



Dear Sir/Madam

Review of Australian Standards for the Export of Livestock – Stage 1

Sheep Producers Australia (SPA) welcomes the opportunity to provide a submission into the Review of Australian Standards for the Export of Livestock (ASEL) – Stage 1. SPA supports this review and the submission from the Australian Livestock Export Council (ALEC) to ensure the standards remain fit for purpose and improve animal welfare outcomes across the export supply chain.

SPA supports the live export of Australian sheep, albeit a relatively small market in comparison to the total market for sheep and lamb product. However, at a regional level and for specific classes of livestock, the live export trade provides a very important market outlet, and in the absence of the live export trade the financial viability of many regional livestock industries, particularly in Western Australia¹, would be severely challenged.

SPA therefore strongly supports initiatives and contributes to much of the research and development that improves animal welfare outcomes across the sheep meat supply chain, including the live export market. We therefore make the following comments on the Review of Australian Standards for the Export of Livestock – Stage 1.

Issue 1: Improving the format of ASEL

SPA supports the proposed new format and agrees with the intent to have all requirements of ASEL in a single document, recognising that the new format does not alter the regulatory requirements of exporters.

Issue 2: Improving ASEL content through a review work plan

The current ASEL review is an opportunity to refine the current standards to address issues of duplication, inconsistency and ambiguity and to ensure that all standards are essential, verifiable, clear and underpinned by science.

Consistent with the recommendations in the Farmer Review, *Independent Review of Australia's Livestock Export Trade, 2011*, SPA considers that ASEL needs to continue to evolve based on the results of scientific research².

The Livestock Export Research and Development Advisory Council (LERDAC) is currently undertaking a number of scientific studies related to heat stress, bedding management and ammonium levels on-board livestock export vessels, which will provide scientific and technical literature to further underpin the ASEL standards and provide animal welfare outcomes that demonstrate and verify compliance. SPA is a member of this council and fully supports its charter to provide scientific, evidence-based research that will further strengthen Australia's reputation as a world leader in improving animal welfare outcomes in the live export industry.

¹Enhancing the competitiveness of the Australian livestock export industry.

²Independent Review of Australia's Livestock Export Trade.



While being supportive of the live export trade, SPA considers that research and development to improve on-board animal welfare standards is best guided by exporters through ALEC and LiveCorp. SPA does however consider that further research be conducted into on-farm preparation of both sheep and cattle and loading of higher-risk livestock to transport to feedlots. Improved preparation is likely to result in both enhanced animal welfare outcomes and economic benefits.

SPA remains concerned about the current Standard 3.9, relating to the export of sheep from pastoral areas and considers that further work is required to ensure this standard appropriately reflects the mortality risk posed by exporting these sheep. Further research is required to uphold this regulation, other than the current broad, geographic restrictions currently applying under ASEL.

In considering the above SPA seeks assurances that the potential implementation of the Livestock Global Assurance Program is not compromised by the review process, or the implementation of ASEL review recommendations. Any changes to ASEL will require appropriate consideration and resourcing.

Should you wish to discuss any aspects of this submission please do not hesitate to contact John McGoverne, Policy Director on 02 6269 5610 or at jmcgoverne@sheepproducers.com.au.

Yours sincerely

Sue Dillon
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