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The Chair
Technical Advisory Committee
ASEL Review

Dear Sir/Madam

ASEL REVIEW - STAGE 2

Thank you for the opportunity to provide feedback on the second stage of the review of the Australian Standards for the Export of Livestock.

As a preliminary comment, we are disappointed that the consultation period has been much too short to enable meaningful consultation and engagement with stakeholders, given the level of technical detail that is involved.

Townsville Against Live Export Inc. believes that the live animal export trade operating from the Port of Townsville and elsewhere in Australia is cruel and unnecessary and that there are alternatives that would be better for the animals and for our community. Until the trade ends there needs to be a significant improvements made to reduce the suffering experienced by animals going into the live export trade.

While the proposed amendments will bring some improvements in conditions for animals being exported for slaughter they fail to address a number of concerns raised in our original submission, notably:

1. Cattle exported from northern ports such as Townsville will continue to be permitted to be loaded under extreme weather conditions likely to risk them suffering injury, stress and poor animal welfare outcomes, and to travel without bedding or the care of competent and independent vets, employed by a third party.
2. The proposed amendments do not include any restrictions on the export of animals from ports located in the tropics such as Townsville and Darwin to ports in the northern



hemisphere where temperatures can be close to zero, as was the case with the cattle exported to China on the Bison Express in January 2018.

3. Our submission suggested a maximum weight of 500kg for cattle being exported live to reduce the risk of animals being unable to get up should they fall or suffer foot and leg problems during the voyage and while there are weight restrictions in the proposed amendments they could be further improved to help ensure better animal welfare.

Details of our concerns regarding specific sections of the proposed amendments are:

Section 2B.6 Animals are loaded and unloaded safely

- (a) **Livestock must be expediently loaded and unloaded by a sufficient number of competent stock handlers in a manner that prevents injury, minimises stress and ensures that livestock husbandry and welfare needs are addressed.**

It is unclear if this section would prevent animals from being loaded during heavy rain after standing in wet conditions, or from being loaded during periods when high temperatures and humidity were being experienced. The animal welfare concerns regarding cattle being loaded from Townsville during extreme weather conditions were raised in our original submission. (See Mortality Investigation Report 61 cattle exported by sea to Vietnam in March 2016. This shipment was exported from Townsville during a period of prolonged wet weather. All the animals were over 500kg. In addition to problems with lame cattle due to the wet conditions, the stockperson reported that, "it appeared some animals had fallen asleep on top of others early in the voyage which may have resulted in smothering).

Concerns regarding the welfare of cattle exported from warm conditions in tropical Townsville to the cold weather of a northern hemisphere winter, as experienced by cattle exported to China on the Bison Express in January 2018, also do not seem to have been taken into consideration when drafting the amended standards.

Section 3A3.3 Bedding

- (a) **Cattle and buffalo on voyages of ten (10) days or more must be provided with sawdust, rice hulls or similar material to be used exclusively for bedding at a rate of at least seven (7) tonnes or 25 m³ for every 1000 m² of cattle pen space.**

NOTE: This does not apply to cattle and buffalo loaded from Brisbane or a port north of latitude 26° south and exported to Southeast Asia or Japan.





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Our submission asked that all cattle exported by sea be provided with adequate bedding, but this section makes it clear that the requirement to provide bedding does not apply to cattle exported from the Port of Townsville to Southeast Asia.

Section 3B.5 Personnel

The on-board management of livestock for export by sea must ensure the health and welfare of animals during the voyage:

(a) An accredited stock person must accompany each consignment of livestock and must remain with the consignment until the vessel has completed discharging at the final port of discharge.

(b) An accredited veterinarian must accompany each consignment of livestock where required by the relevant Australian Government agency and must remain with the consignment until the vessel has completed discharging at the final port of discharge.

Accredited veterinarians must accompany consignments by sea that are:

A. travelling to or through the Middle East

B. undertaken upon new or recently renovated vessels, or

C. the first consignment for an exporter.

It is disappointing that there is no requirement for competent and independent vets, employed by a third party, on all live export ships as requested in our original submission to ensure animals are able to be provided with appropriate veterinary care regardless of the length of the voyage or the ship's destination.

We trust that the Technical Committee will consider these comments and we trust that further changes can be made to better reflect community expectations regarding animal welfare during live export operations.

Yours sincerely

Jennifer Brown
President
Townsville Against Live Export

