Stage 2: Issues Paper

Review of the Australian Standards for the Export of Livestock

Submission by Vets Against Live Export (VALE Inc)

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VETS AGAINST LIVE EXPORT
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Technical Advisory Committee
C/- Department of Agriculture and Water Resources
GPO Box 858
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Dear Committee,

Thank you for the opportunity to make a submission to the **Review of the Australian Standards for the Export of Livestock.**

Vets Against Live Exports (VALE) was established in 2011. It currently has over 200 members. Since its establishment, VALE has sought to provide informed and factual comment on the live export industry, including on the science and husbandry principles applying to it. VALE has regularly been requested to lecture at scientific meetings and provide briefings and review on the subject to veterinary organisations, the media, politicians and government ministers.

VALE welcomes this opportunity to make a submission to the Review.

Yours sincerely

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1. Consultation

It is essential that groups and organisations, who oppose the live export trade are not excluded and that decisions by the technical committee are evidence based.

2. Overview/Introduction

VALE strongly supports the aims of the review as stated but bearing in mind that VALE believes that animal welfare compromise is inherent in the nature of the trade. However, whilst the trade continues, significant improvements can be made to help safeguard animal welfare.

This review aims to address concerns that:

- *The standards do not deliver acceptable animal welfare outcomes for exported livestock within a viable industry.*
- *The standards do not meet community expectations for the welfare of animals.*
- *The standards are not based on the best available scientific evidence.*

ASEL animal welfare requirements must be animal based, evidence based, able to be monitored, recorded and reported and enforceable.

3.1 Reportable mortality rate (RMR)

1) The reliance upon RMRs to monitor and/or help safeguard animal welfare is inappropriate and limited. The nature and severity of negative physical and mental impacts on animals during live export must be considered as a more appropriate parameter and in conjunction with mortality rates. For example, where heat stress is considered the main cause of death, an estimate of the prevalence of animals (ie morbidity) experiencing high heat stress must also be determined.

2) Investigations should not just be triggered by notification of 'reportable' mortality rates. As described above, other welfare parameters need to be set to identify where welfare is compromised so that appropriate action is taken, as well as an investigation to help reduce the risk of future occurrences of similar incidents. Further, random inspections of relevant documents should be undertaken as part of the monitoring of animal welfare, e.g. Masters Report, Independent Observer Reports & AAV/stockperson Reports.

3) There should be a relationship between the average mortality and the RMR but this should be tracked continuously with averages being updated on a monthly basis and therefore the RMR needs to be reviewed. As mentioned previously, morbidity for specific conditions such as inappetance, scouring, heat stress etc.

4) The current purpose of the RMR is to trigger an investigation but this should not be the only one. For example, there needs to be random investigations as well as investigations triggered by high morbidity rates for specific conditions. The information gathered and analysed should be used to review the adequacy of ASEL to minimise similar incidents in the future on an ongoing basis.

5) All relevant epidemiological factors which can influence the RMR must be considered and reported for specific parameters. For example, even though the overall RMR may not be exceeded for a total consignment, unacceptably high mortality rates may occur in specific cohorts onboard a ship. This needs to be considered.

6) Inclusion of other welfare indicators is supported and need to be considered. For example, a prevalence of inappetance should be considered and for long haul voyages, individual body condition must be assessed to ensure animals do not lose substantial body weight and/or condition score. It is paramount that the the welfare of individual animals is safeguarded. The number of animals who died as well as the number who were euthanased should also be reported as this indicates the level of monitoring and capacity to prevent suffering of sick and moribund animals.

3.2 Voyage reporting

1) Recommendations by the 2012 ASEL Review Committee to expand both daily and end of voyage reports are strongly supported. All voyages, including short haul should be required to submit daily reports and should be comprehensive in terms of specific pens and reflect important aspects of the loading plan. Further such reporting should be provided by an independent auditor to ensure transparency and accountability.

2) The changes to voyage reporting as recommended by the McCarthy and the Department should be more broadly applied. Specifically, ASEL mandated animal welfare indicators should be reported on a daily basis. Welfare indicators outlined under W.LIV.3032 (Development and assessment of livestock welfare indicators MLA Project Report) are recommended to be used for reporting. It is recommended to develop reportable levels for each indicator which need to be a critical level at which to exceed this would compromise animal welfare. It is noted that for dairy heifers, specific parameters relating to udder conditions such as mastitis, engorgement etc be included as welfare indicators.

3) There should be no debate regarding voyage reports being publicly available with hefty penalties for those who withhold or alter specific data. The industry must be accountable and transparent.

4) On-board realtime monitoring of animals is supported and could be achieved through CCTV which can be viewed at any time by those delegated responsibility for animal welfare under the direction of the ship's captain as well as independent observers. CCTV footage should also be referred to in reports and should be available to the regulator to view as part of investigations.

5) The specific recording and reporting of additional environmental parameters on vessels during voyages is strongly supported and should include dry and wet bulb temperatures, humidity, air flow and ammonia levels at various locations (at sheep head level, in several pens that are representative and for pens which may be considered high risk for any parameter, e.g. pens near bulk heads may be hotter etc) on each deck. Ideally, this data should be electronically logged and alarms included when thresholds are exceeded so that corrective action can be taken immediately. Trigger levels should be able to be set which reflect points at which welfare may be compromised.

6) It is recommended that reporting is based on welfare indicators recommended by the McCarthy Review and identified in W.LIV.3032. Trigger levels should be able to be set which reflect points at which welfare may be compromised.

4.1 Limits relating to heat stress risk assessment application

1) It is recommended that paragraph 3A.4(a) (ii) is amended to include other geographical locations to cover all destinations which experience ambient temperatures and humidity which pose a high risk of heat stress to Australian animals. This is not restricted to sheep on long haul voyages but may affect cattle to some Asian destinations as indicated by recent mortality events on *MV Dareen* and *MV Yangtzee Harmony*.

2) Given the evidence that animals will experience some heat stress during May to October to the Middle East, it is recommended that all voyages cease during this time. Only focusing on August on the basis of having the highest mortality rates, this does not consider the welfare impact of the other months where although mortality rates may be lower, the negative effect of heat stress is significant. This point was raised in the Australian Veterinary Association submission to the McCarthy Review (2018) which recommended against exporting live sheep to the Middle East from May to October.

3) All markets should be reviewed in terms of potential risks of heat stress due to climatic conditions.

5.1 Sourcing *Bos taurus* cattle

1) Paragraph 1A 3.2 (c) (iii) should not be retained in its current form but modified to prohibit the export of Bos Taurus cattle during May to October irrespective of the location of breeding and without exemption under an agreed livestock heat stress risk assessment.

2) Paragraph 1A 3.2 (c) (iv) should be modified to reduce the maximum BCS from five to 4.5 and state that animals with at least 50% Bos Taurus be considered as Bos Taurus.

5.2 Shearing livestock with wool, fibre or hair

1) The minimum time off-shears should be consistent irrespective of whether sheep are shorn at the feedlot or elsewhere. This minimum time allows for cuts to heal and for animals to recover from shearing which is stressful. Further, sheep being shorn elsewhere should not be loaded and transported within 48 hours of shearing to allow recovery. The maximum wool length should remain as 25 mm without DAFF discretion.

2) The same requirements should apply to all hair sheep and alpacas as for wool sheep, ie 25 mm limit and at least 10 days from shearing to export.

3) Yes, see above.

4) Yes, see above.

5) Yes, see above.

5.3 Maximum weight for cattle and buffalo to be exported by sea

1) This should remain unchanged unless there is evidence to alter this on welfare grounds.

2) The maximum weight for cattle and buffalo should be consistent irrespective of whether they are being exported for slaughter or breeding purposes.

3) It is recommended that the maximum weight limit be 500kg. Heavier animals pose many risks including reduced capacity to regain feet in the event of going down and associated problems with downer cattle including reduced circulation and tissue damage of limbs caught under the torso. Bigger animals especially if due to fat are more susceptible to heat stress.

4) A weight restriction is the most appropriate parameter as different breeds may have a different body score range, i.e. dairy breeds versus beef breeds.

5.4 Minimum holding times in registered premises

1) Paddock-based feedlots

The standard should include a prohibition on the live export of goats by sea.

For sheep, the minimum time spent in paddock-based feedlots should be based on optimal welfare in terms of acclimatisation, especially to pellet feed, whilst minimising the risk of feedlot related conditions such as salmonellosis. There does not appear to be any evidence to support reducing the current holding times. Pre-selection of ‘fit’ sheep is paramount and should be the focus of continuous improvement, especially regarding shy feeders.

2) Indoor facilities

The current holding requirement for sheds is 5 days. However, there is evidence that mortalities are lower for sheep assembled for 7-8 days compared to 3-6 days (see LIVE.123 p96). Thus, is recommended to increase the mandatory holding requirement to 7 days.

3) The standards should be amended regarding mandatory timelines for various classes of livestock to be exported by sea to reflect causative factors identified through in-depth investigation of health and welfare incidences, e.g. short holding times and/or movement of cattle between registered premises.

4) The associated costs of increasing holding times prior to export are not publicly available. However, it is essential that animal welfare is not compromised due to commercial gain.

5.5 Shy feeders and inanition in sheep

1) Shy feeders are a serious condition relating to live export as well as salmonellosis which account for most on-board mortalities. These causes have been the focus of considerable research but unfortunately deaths from these causes continue, mainly due to industry failing to adopt recommendations and/or further causative factors not being identified.

2) The main changes which could be implemented to reduce salmonella/inanition in live sheep export is to improve identification and removal of shy feeders prior to entering and leaving feedlots.

3) The associated costs would need to be calculated and when doing so it is important to consider the value of losses of sheep who have died and those who have lost condition (although it is noted that exporters do not suffer financial loss from deaths)

5.6 Pregnant animals

1) The pregnancy test requirement for Damara sheep should be reduced from 40kg as it has been shown that conception can occur at 30kg.

2) Standards should be expanded to include all fat-tailed sheep.

3) Pregnancy testing must only be undertaken by a registered veterinarian with demonstrable appropriate experience; for breeder cattle, only veterinarians registered under the National Cattle Pregnancy Diagnosis Scheme. It is also imperative that animals in their third trimester are not exported – this needs to be calculated on the minimum average gestation period. Pregnancy status must be recorded and linked to the individual RFID code.

4) A blanket change of extending pregnancy testing from 30 to 45 days prior to export is not supported but could be considered on a case by case basis and only where non-pregnancy status can be maintained.

5) Increasing the age that goat kids and ewe lambs are pregnancy tested before export to more than five months of age is only supported if this is based on evidence that pregnancy can be confirmed at the earliest age of conception at five months. It is imperative that pregnancy is not missed.

6) Current methods for carrying out pregnancy tests are inadequate, with the same test being used to determine either length of pregnancy or pregnant/non-pregnant. It is essential that requirements to assess pregnancy testing operator competency are stringent. Individual identification with pregnancy status (RFID code) must be recorded.

7) Only veterinarians accredited under the National Cattle Pregnancy Diagnosis Scheme should determine if breeder cattle and buffalo are too small to be manually palpated, in which case testing should be done by ultrasound by an accredited veterinarian certified for ultrasound pregnancy testing.

8) Potential costs associated with any changes are not publicly available but commercial gain must not take priority to animal welfare.

6.1 Stocking density

1) The use of an allometric metric model for stocking densities is supported but on the basis that the assigned k-value must be sufficient for all animals to be able to lay down simultaneously, access food and water, as well as allow sufficient inspection of all animals, especially to identify shy feeders. It should be noted that an extra 15% space allowance is made

2) The McCarthy Review application of a k coefficient of 0.033 is not supported but a value of 0.047 should be used to ensure individual animals can lay down simultaneously and access feed and water.

3) Applying a factor associated with curfew and anticipated weight during the voyage is supported as is the Department's approach as per the McCarthy Review.

4) Unable to comment on financial impact of on-board stocking densities but it is obvious that profitability may be affected but animal welfare must not be compromised for commercial gain.

6.2 Registered premises stocking density

1) Recommend that space allowance exceed that recommended on-board vessels with a k value of 0.047. Regarding sheep held in sheds at registered export premises, most are held in large groups with >31 animals where current requirements are 0.33m^2 if less than 10 days and 0.5 m^2 for >10 days. However, if a k value of 0.047 is used then the space allowance is 0.654m^2. Separate stocking densities should be used for beef and dairy cattle.

It is also recommended to consider access to trough space which can be limited on board. Therefore, it is suggested that the following equation developed by Broom & Fraser (2007) is used;

Length of trough (m) = $0.112 \times W^{0.33}$

Reference: Broom DM & Fraser AF (2007) Domestic Animal Behaviour and Welfare. CAB International, Wallingford, pp. 180–207.

2) The following options included in the 2012-13 Review are supported;

Sheep – mesh flooring used in sheds must allow animals to lay down and get up comfortably; shed design and stocking densities must allow inspection of individual animals to allow removal to ensure unfit animals are not exported and provided with appropriate treatment as soon as possible. In addition, the same space allowance must be provided irrespective of the holding period, i.e. if delays occur, stocking densities must not be reduced.

Cattle & buffalo – space allowance of 9m^2 is recommended to be consistent with national feedlot standards, irrespective of the holding time length.

3) Unable to comment on cost implications of changing stocking densities but commercial gain must not take priority over animal welfare.

7.1 Bedding and ammonia levels

1) Bedding for cattle is very important with current requirements either being inadequate or not complied with. It should be noted that dairy cattle require special consideration regarding bedding.

2) Bedding - Requirements as described in Option 3 in Appendix 4.3 Provision of bedding in the 2013 Draft AAWSEL are supported.

Ammonia – the standard should include a maximum ammonia level of 25ppm which is based on industry research (LIVE.218).

3) A requirement that bedding is used to manage an appropriate faecal pad is supported.

A requirement to include a statutory reserve amount of bedding be required as a contingency amount to manage flooded pens is supported.

4) Unable to comment on cost implications of changing current requirements regarding bedding and ammonia but commercial gain must not take priority over animal welfare.

7.2 Water, fodder and chaff requirements on vessels

1) For all long-haul and extended long-haul cattle voyages, the requirement for at least 1 per cent of fodder being chaff and/or hay is supported.

2) It is recommended to provide chaff on all vessels to help minimise scouring and bloat in cattle, as well as shy feeders.

3) Automated water systems must be mandatory on all voyages to ensure animals have ad-lib access at all times. However, there must be monitoring to ensure a continuous supply and contingency plans in case of breakdown etc. Curfewing of water is not acceptable.

4) Extra fodder must be provided for voyages exceeding 10 days to avoid rationing if delays occur which result in increased competition with some animals not receiving optimum daily intake as well as stress which may lead to disease outbreak.

8.1 On-board personnel and animal monitoring/management

1) In terms of on-board personnel accompanying live export consignments, there needs to be an appropriate number of veterinarians, stock persons and veterinary equipment/medications to ensure appropriate care and treatment of individual animals. Furthermore, every voyage must include an independent auditor (appropriately experienced vet or animal scientist who has animal welfare qualifications) whose job it is to monitor and report on conditions and welfare of all animals as well as compliance with ASEL throughout the voyage to the regulator. Staff reviewing such reports must be appropriately trained to be able to identify non-compliance as well as incidents requiring further investigation.

2) The following amendments to current requirements are recommended;

- All AAVs to be appointed by the regulator to avoid conflict of interest.

- All live export consignments to be accompanied by an AAV

- All live export consignments to be accompanied by an independent auditor whose primary responsibility is to report to the regulator on the health, welfare of consigned livestock and compliance with ASEL.

- the ratio of AAVs and stockpersons to the number of cattle and sheep must be calculated based on the ability to inspect and if required treat individual animals on a daily basis to ensure sick/injured animals are identified and treated promptly.

3) The 2012-13 review option to require an AAV to accompany all live export consignments is supported as an AAV is essential to ensure appropriate diagnosis of disease conditions, conduct of post mortems and appropriate treatments (especially with antibiotic resistance being a significant issue).

4) The current requirement of independent observers does not negate the need for AAVs as they are responsible for completely different tasks.

5) Roles and responsibilities for personnel

In general, the relevant recommendations in the Draft AAWSEL from the 2012 ASEL review are supported as outlined in 'Appendix A. 1 Roles, responsibilities and competencies of livestock export supply chain operators' (p11-17) with the following changes.

a) AAVs – add training requirements such as regular and/or as required regarding any changes to ASEL. Also, specify that the AAV provides assistance to the Independent Auditor in relation to reporting animal health/welfare issues and non-compliance with ASEL to the Regulator.
b) Accredited Stockpersons – as per AAVs

6) Any additional costs associated with placing additional AAVs on voyages should be the responsibility of the exporter.

7) Unsure what is meant by 'at all times' as it would not be physically or practically possible to do this. It is recommended that an appropriate schedule is developed to ensure that the most common conditions can be monitored to allow prompt treatment and/or euthanasia. For example, monitoring intervals for heat stress would be more frequent than for salmonellosis.

8.2 Vulnerable/special classes of animals

1) Specific requirements need to be in place for vulnerable or special classes of livestock based on examination of mortality records to reduce potential risks.

2) Yes, as above.

9.1 Exclusion of deer and camelids

1) Goats, deer and camelids should not be transported by sea due to higher risks of stress for these species. This requirement should be included in ASEL. If this is not done, then stringent requirements must be in place to prevent compromised animal welfare for these species.

2) Pastoral & station sheep definitions - seems reasonable

3) Body conditions scores – seems reasonable; must be standardised

4) Quantification of terms – agree

5) Appendix F Table 10 to apply to all classes of cattle and buffalo – agree

6) Appendix F updated – agree

7) Minimum requirements for dosages – concern that minimum may be insufficient; this requires serious consideration

8) Minimum liveweight increase for sheep – agree but also have minimum BCS of 2.5 as liveweight does not reflect the condition of the animals

9) Minimum liveweight increase for goats – don't export goats by sea; agree but also have minimum BCS of 2.5

10) Don't export goats by sea but if do so, then agree with a) & b)

11) Agree but also increase space allowance

12) No comment

13) Horned goats should not be exported by sea

14) Animals with long horns must not be exported; this is an on-farm management issue and should be part of proper preparation

15) No comment

16) Water provision – water should be freely available at all times.

17) Agree

18) Agree

19) Agree

10. Definitions

Haulage (long & short) – must include loading time, not just at sea

Morbidity – add as this is very important in terms of assessing animal welfare and investigating incidents.

END.