27th November 2018,

Department of Agriculture and Water Resources

GPO Box 858

Canberra ACT 2601

Dear Sir/Madam,

**RE: Draft report – review of Australian Standards Exporting Livestock.**

Thankyou for the opportunity to provide community response feedback to the draft ASEL review report.

I provide the following points of concern and changes to the recommended standards. Detailed evidence to support these changes is provided in the submissions put forward by RSPCA Australia and the Australian Veterinary Association.

**Sourcing and preparation of animals**

* No cattle should be exported from southern ports across the equator during the high risk May to October period.
* The upper weight limit for all cattle being exported should be set at 500kg, not at 650kg, with no exemptions.
* Sheep must be rested for at least two clear days after shearing and prior to loading, to overcome the cumulative stress of road transport, handling and shearing and to ensure all shearing wounds are healed.
* No sheep, whatever the breed, should be allowed on board a ship with more than 25mm of wool or hair.

**Space allowance for sheep and cattle**

* The space allowances proposed in the draft Standards are still far too small and will force animals to ‘time share’ their space.
* Space allowances must be increased to ensure all animals in a group are able to lie down comfortably at the same time and easily access feed and water, whether they are in a registered premises or on-board ship.

**Heat stress risk assessment (HSRA)**

* The heat stress risk assessment (HSRA) model should be applied to all voyages crossing the equator, at all times of year, from all ports.

**Voyage reporting**

* Voyage reporting requirements should be increased to include more detailed daily welfare monitoring at the pen level, with monitored pens chosen independently of exporters to ensure transparency and accuracy.
* Voyage reports should be made publicly available to demonstrate that exporters have nothing to hide.

**Onboard management**

* Ammonia levels must be tracked using ammonia meters, and action taken when they reach harmful levels.

**Onboard personnel**

* There must be at least one accredited stockperson per 2,500 head of cattle and 10,000 head of sheep (not 3,000 cattle and 30,000 sheep), to allow effective monitoring of stock. A qualified Australian Government Accredited Veterinarian (AAV) must be on board every live export voyage, for supervision and monitoring, as well as an independent auditor with ultimate responsibility for reporting requirements.

**Species permitted to be exported**

* Live export of sheep to the Middle East during the May to October high risk period must cease immediately.
* The live export of feral buffalo should be prohibited, as they are unused to human contact and clearly do not tolerate handling and transport without serious welfare compromise.
* The export of feral goats, camels and deer should be prohibited, based on previous extreme mortality events and serious concerns over the handling and care of these species.

I look forward to your response regarding how the Dept will be address be addressing community expectations and animal welfare concerns in your review of the ASEL standards.

Kind regards,

Meaghan Hughes.