



James Jackson
President

Ref: 18138OC

4 December 2018

Steve McCutcheon
Secretariat of the Technical Reference Panel
Department of Agriculture and Water Resources
18 Marcus Clarke Street
CANBERRA ACT 2601

Dear Panel,

RE: Review of the Australian Standards for the Export of Livestock (ASEL) Draft Report

NSW Farmers' Association welcomes the opportunity to comment on the Draft Report of the Review of the Australian Standards for the Export of Livestock (ASEL Review).

New South Wales Farmers' Association is Australia's largest state farming organisation representing the interests of over 8,000 farmer members from across New South Wales, including farmers who produce livestock for the \$1.4 billion livestock export industry.

NSW Farmers' supports the continuation of a sustainable live export industry that is both accountable and demonstrates positive animal welfare outcomes. Australia is a leader in the global live export industry as the only country that demands welfare is monitored and protected through the whole supply chain.

By improving our live export standards and remaining an active participant in the global trade Australia can influence and raise animal welfare standards across the whole industry. In the event of Australia withdrawing from the live export trade, alternate countries will not replicate Australia's commitment to high animal welfare standards and poorer welfare outcomes would occur within the global industry.

NSW Farmers is committed to ensuring that any amendments to ASEL are supported by scientific evidence and enhance animal welfare outcomes. To ensure the ASEL amendments are adequate any changes must be subject to rigorous due-diligence and not implemented prematurely, as this could produce adverse welfare outcomes. The requirements of ASEL must also recognise the potential for future developments in the industry, such as improved vessel design and other technological enhancements. This necessitates that the ASEL requirements are not overly prescriptive, as this may hinder advancements within the industry.

The Association has provided a response to the specific areas raised in the ASEL Review to achieve these priorities:

- Improved Vessel Design & Technology

NSW Farmers is concerned that the ASEL Review does not anticipate improvements in vessel design and technology, especially developments that allow for greater on-board stock monitoring. Advancements to design and technology will deliver better climate control capabilities. These

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developments would render the recommendations relating to an animal's ability to acclimatise immaterial, especially those on the sourcing Bos Taurus cattle and shearing requirements.

The Association recommends that to enable these design and technological advancements to be incorporated into ASEL, the requirements must not be overly prescriptive and the standards must be updated to reflect these developments as they occur.

- Pregnancy testing competency

NSW Farmers strongly supports the requirement that livestock for export are subject to pregnancy tests.

The Association believes that appropriately qualified and trained laypeople be considered competent pregnancy testers for livestock destined for feeder and slaughter markets. Restricting the ability to conduct pregnancy testing for these trades to veterinarians places an inappropriate regulatory impost on the industry; especially given competent pregnancy testers are capable of meeting the requisite level.

However, in the interests of the industry as a whole, it is essential that a higher standard is maintained for the breeder trade.

- Mortality Rate

NSW Farmers is focused on improving animal welfare and an important element is reducing preventable livestock deaths.

The Association supports the mortality rate recommendations, as it will enhance the industry's accountability. Reducing the reportable mortality rates on both cattle and sheep live export voyages will ensure exporters are held to a higher standard. This is a positive accountability measure that will reduce deaths and facilitate improved animal welfare outcomes.

- On-Board Stocking Densities

NSW Farmers' supports stocking densities that promote quality animal welfare outcomes, based on scientific evidence.

The Association is concerned that the proposed stocking densities in the ASEL Review, are overly prescriptive and the proposed requirements are not founded in clear scientific evidence. The densities need to be able to be scaled, to allow for advancements in technology and vessel design to be recognised and enable higher stocking densities. The requirements in ASEL must be amended to reflect outcomes based on scientific evidence and to permit higher stocking rates, if innovations are developed.

- Heat Stress Risk Assessment (HSRA)

NSW Farmers provided a submission to the Department of Agriculture and Water Resources (DAWR) on the HSRA Review. Our submission raised a number of concerns, including the implementation of animal welfare indicators before they have sufficient scientific evidence. The Association requests that all recommendations relating to the HSRA must not be actioned until there has been sufficient consultation on the outcomes of the HSRA Review.

- On-Board Personnel

NSW Farmers support the requirement that each live export vessel carry an Australian Government Accredited Veterinarian (AAV) on board. This will ensure that each voyage has a trained professional, who will be able to attend to sick animals and also enforce good animal welfare.

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To ensure that these positive outcomes are achieved it is vital that only persons with sufficient skills and experience in managing livestock can fulfil these positions. The role of AAV should be limited to vets with extensive experience with sheep and cattle. It is also critical that decoupling the role of the accredited stockperson and AAV can be accommodated by exporters, in terms of staff amenities and financially.

The Association appreciates the opportunity to comment on the ASEL Review and reinforce that any amendments must be based on clear scientific evidence to ensure that good animal welfare outcomes are achieved.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Jackson', written in a cursive style.

James Jackson
PRESIDENT