ASEL stage 2 - TAC draft report November 2018

Comments by Onn Ben-David OAM BVSC

While I recognise that the proposed changes to the ASEL that have been considered and discussed in recent month are certainly better than the current ASEL version, the overall effects of these changes are not as good or as progressive or as caring for the animals involved as they should have been. The suggested changes are still not sufficiently focused on animal welfare, do not truly consider animals as a sentient creature and indeed in many respects, consider the animal cargo as a commodity in the trade. The current recommendations seem to only take very few short steps to improve the care and respect for the animal while focus predominantly on d protecting the industry and the trade. The release of the scientific literature review and the use of scientist on the TAC have not really achieve any meaning full changes from the animals point of view and has not reduced, mitigated the animal welfare risk associated with the trade.

See below some of the main concern I have with regard to the draft TAC report with regard to the 2nd issue review.

1. Considerable gap in the scientific literature versus ASEL requirements is very clear following the release of the literature review. It is important to highlight this deficiency and reiterate the importance of employing all the data, results and measurements that are observed and recorded in the day to day monitoring of the trade. While this is not a peer review science never the less it is considerable volume of information which is accumulated during the conduct of the trade which must not be “wasted” in a government archive. This data should be used to further study the trade and its implications on the welfare and wellbeing of the animals involved. And be made public for the benefit of all concerns.
2. The notion that: improvement /changes /amendments of the current standard cannot be permitted unless a peer review papers support such change is unacceptable unless seriously consider many procedures and provisions that are in the current ASEL that do not have a peer review scientific support. While this suggestion is not scientific in itself it does reflect fairness and equality. Accepting current practices and /or modifying them based on evidence base finding needs to be applied across the board and not just selectively one way.
3. The community attitudes and rights to know seem NOT to be accepted or supported in the ASEL and by the committee. This deficiency is very obvious in many of the discussion’s sections of the draft TAC committee report. Indeed, the narrowness /shallowness approach of the committee is obvious in just about all the 44 recommendations. It is very annoying and very appalling it is unfair and unbalance and reflects badly on the TAC committee in general. Recommendations are most certainly slanted demonstrably to one side. Support the trade ignore community / animals / and at time the science as well.
4. Accepting “current” practices that are not peer reviewed on the grounds that it is how we did things all the years and excluding suggested amendments because that there is in “sufficient peer review support” is not applying same rules across the standard and must be rejected.
5. The prevailing concept should be that “the animal and not the exporter must always be given the benefit of the doubt”. Unfortunately, this philosophy /concept is not very evident in many of the issues and provisions. Too often the ASEL seem to seek to satisfy the exporter and facilitate the trade on the expense of the animals and their welfare. There are many such examples in the 44 recommendations on the draft report.
6. Many specific comments by the AVA, VALE provided in written form to the review committee have not been picked up. Many principles that were promoted by the AVA based on scientific, experience and evidence base seem to have been ignored. At time I am not sure if it is the advice or the AVA evidence is what the committee is rejecting. In some cases, it seems, interpretations of the same publications by say the AVA and VALE seem different to the interpretations the TAC committee promote in the response.
7. There are to many references to “leave matters for the department /regulator discretions” which is of concern to me. The regulator should regulate and not be placed in the position of actually writing protocols, instructions, guidelines or further requirements. All these should be developed by the ASEL review process through the open transparent and consultative “democratic’ process. The Regulator had had its share of concerns and the Moss review identified and documented it.
8. Compliance with ASEL has never been policed effectively and we are yet to see how will it be undertaken in the future. There are many recognised natural / procedural and situational difficulties in enforcement not to mention the deliberate bureaucratic and political “disrespect” to ASEL enforcement. To also purposely and deliberately set the ASEL standard on minimal base is totally unacceptable. Too many provisions conditions and parameters are set at the lowest level rather than aim to the middle range or indeed to the higher level of management, restrictions or provisions.
9. Section 6 (food and water). Water is by far a bigger concern for welfare and MUST be available in the pen all the time. What are the limitations for Water in the pen upon arrival of animals? Food with in 12hrs is less critical for welfare generally. NOTE Recommendation 36 calls for water to be available at all the times which is in some contradiction to R35. Which say wihin12hrs of loading.
10. Section 6 (hay and chaff). Recommendation 37 what so significant between Day30 to Day31 of a journey that drive the committee to recommend doubling of amount of chaff/ hay from 1% to 2%. Wouldn't it be better to increase the amount from say day1o to 31 proportionally so over 30 it will be 2% at the end. This way we mimic increases as journey days are increased and we are set more logically.
11. Ammonia concentrations recommendation is concerning it must be measured and recorded daily preferably continuously and should specify 20 ppm as upper limit. In the TAC own wording 25 PPM is known to cause health/ injury issue to people and indeed is considered as an OH&S issue at this level. Furthermore, I believe the Upper limit of acceptable in the Pig and Poultry standards is set at 20 PPM
12. The stock density compromise as articulated by the committee is well outside scientific basis and is a clear and obvious blast against welfare and in support of the industry and the trade. Such a compromised approach puts a large question mark about the entire TAC motivation and aims.
13. The provision of bedding is insufficiently addressed and is not monitored in any meaningful ways to improve and or insure the welfare of the animals is not compromised.
14. The importance of an in-depended veterinarians on every voyage is still not a reality as is the pregnancy testing which must be undertaken by registered veterinary practitioners.
15. There are considerable concern regarding conflict of interest and transparency which seem not to be effectively addressed or discharged with regards to personal involved with the production of the Literature review, having undertaken research on this topic themselves, and serving on the TAC committee framing recommendations and changes to the ASEL.

A lot more progress is needed if we are to look for justifications of this trade.

Thanks for the opportunity to express my opinion.

Cheers

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