



The veterinary voice in animal welfare

## **Submission by Sentient of operational comments on Stage 2: Draft Report: Review of the Australian Standards for the Export of Livestock (Technical Advisory Committee Reformatted Standard 30 Oct 2018)**

26/11/2018

To Whom it may Concern,

We wish to submit our suggested amendments to the Draft recommendations (see under Comments):

**Draft Recommendation 3.** That the standard prevent *Bos taurus* cattle with a body condition score of four (4) or more being sourced for export from, or exported through, any area of Australia north of latitude 26° south from 1 October to 31 December (inclusive).

**Comment:** No animal with a BCS greater than 4 of a possible 5 should be exported in any month to anywhere due to the risk of heat stress. Examples of poor outcomes are the recent reportable mortality events with the MV Dareen and the MV Yangtze Fortune (?)- both in 2018 from Australia to China- slaughter weight *Bos taurus*.

The Discussion states Arabian Sea concerns; it should be noted that *Bos Taurus* are vulnerable to heat stress not only in the Middle East, North Africa, Pakistan and Turkey but also on any voyage past the equator encompassing Russia and China.

**Draft Recommendation 4:** That the standards require that sheep to be exported by sea have no more than 25mm of wool, with hair sheep excluded from that requirement given their natural tolerance for heat and lack of information on the stresses associated with shearing those animals.

**Comment:** Hair sheep (and goats) should not be excluded from this requirement because their excessive hair/wool prevents staff from monitoring them for a range of health problems.

- For example, in the end of voyage report of the reportable voyage of the MV Murray Express from Port Kembla to Madagascar 2007/2008, long haired goats could not be monitored for respiratory distress, ocular or nasal discharge indicative of disease due to excessive hair/ wool length.

- It is well known operationally from AAV and Stockman reports that exotic hair sheep such as Damaras cannot be monitored properly for weight loss, bloat, inanition (low gut fill), increased/ labored, respiratory rate and scouring due to excessive hair presence. The fat tail of these sheep often also masks the presence of scouring. The shearing of these animals would enable monitoring for welfare and health parameters as with wool sheep. To not shear these animals would be to deny them the same monitoring provided to other sheep.

**Draft Recommendation 6:** That for sheep held in sheds at the registered premises, the standard require they be given at least one 'clear day' between shearing and loading for export. (Note: refer definition of 'clear day' at Recommendation 9).

**Comment:** Sheep require at least two clear days between shearing and loading to minimise cumulative stress.

**Draft Recommendation 7:** That industry investigate potential to reduce leg cuts/injuries and infections by not shearing the distal legs, and accommodate in best practice arrangements for further monitoring.

**Comment:** Distal legs should be shorn to prevent the animals from collecting and holding wet faecal matter on their distal legs in the wool which, in turn, becomes a dermatitis that animals then scratch with their mouths, thereby ingesting faeces and urine that could lead to disease transmission.

**Draft Recommendation 8:** That existing weight thresholds for cattle and buffalo be retained, but with outcomes for animals over 500kg monitored over the coming 12 months to assess whether the upper threshold weight should be reduced from 650kg, and whether an absolute upper weight limit is necessary.

**Comment:** 500 kg should be the maximum weight of all cattle loaded, to reduce injury from decking and smothering and make management of these animals easier if they do require sedation and maneuvering for injuries. There should be no exceptions to this maximum weight limit.

**Draft Recommendation 11:** That the standards require all classes of cattle travelling on short and longhaul voyages to be held at the registered premises for a minimum of two clear days, irrespective of the location of the premises and the number of loading/discharge ports on the voyage. Three clear days should be required for all classes of cattle travelling on extended longhaul voyages.

**Comment:** All classes of cattle should be held in registered premises for a minimum of 3 'clear days' to enable inspectors preship loading to identify any shy feeders by visual lack of gut fill. Unless hay is being carried on the ship, access to hay during this period should be denied so an animal cannot be loaded with gut fill of hay having avoided the pelletised feed.

**Draft Recommendation 13:** That the standards require that, of the five clear days for which sheep and goats are held at the registered premises (refer Recommendation 10), they are fed ad libitum on pelletised feed equivalent to the shipboard ration for at least the final three clear days. (Note: refer definition of 'clear day' at Recommendation 9).

**Comment:** Animals must only be fed pelletised feed for the reason stated in comment above re DR 11.

**Draft recommendation 20:** That the standard adopt an allometric approach for calculating on-board stocking densities for sheep, with a k-value of 0.030 to be applied to the voyages during November to April, and a k-value of 0.033 for voyages during May to October.

**Comment:** K value of 0.033 on all voyages based on natural behavioural space requirements and the unacceptability of 'timesharing' for resting space.

NB: Stocking densities were originally developed based on engineering safety requirements regarding the weight of the cargo to be held with railings/ pens, so that if all the 'cargo' (livestock) were to move violently at the same time in rough water then the pens had the strength to not break. This was not an animal husbandry study. (Personal communications: AMSA, and Mike Kiely ex GM of RETWA).

**Draft Recommendation 21:** That the standard adopt an allometric approach for calculating onboard stocking densities for cattle, with a k-value of 0.03. Where this approach determines a space allowance that is lower than the current ASEL requirement for a given liveweight and voyage, the higher space allowance will apply.

**22.** That in relation to special categories of livestock, the following approach should apply to on-board stocking densities:

a. Buffalo: 10 per cent more space than required for cattle.

**Comment:** In addition to 10% extra space allowance, all voyages carrying Buffalo should carry a veterinarian to determine why they have a higher mortality rate compared to cattle.

**Draft Recommendation 27:** That the reportable mortality level for cattle and buffalo should be set at 0.5 per cent, or three animals, whichever is the greater; and that an average daily mortality rate of greater than 0.025 per cent be added to the list of events that would qualify as a 'notifiable incident'.

**Comment:** To be consistent with other reportable mortality triggers, short haul voyages of up to ten days should have a mortality trigger of 0.25%. Hence all are halved from current ASEL levels.

**Draft Recommendation 32:** That the standards require that cattle and buffalo on all voyages are provided with sufficient sawdust, rice hulls or similar material to be used for bedding at a minimum rate of 4 tonnes per 1000m<sup>2</sup> per application, with a minimum of 4 tonnes per 1000m<sup>2</sup> provided after each washdown.

**Comment:** Pre-voyage management should account for requirement based on number of likely required reapplications after washing, including requirements on ramps and alleyways for discharge and loading.

NB: regarding Daily voyage report templates- there should be a direct section asking for intelligence regarding any ventilation breakdowns, fan malfunction or blackouts affecting ventilation and timeframe of events to the point of rectification.



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**Draft Recommendation 34:** That once the variables affecting ammonia levels are better, and practical measurement devices are available (noting the current Livestock Export Program project underway), a requirement be inserted into the standards that: (i) ammonia levels in livestock spaces must not exceed 25ppm, and (ii) that ammonia reduction measures must be implemented if levels exceed 25ppm in any given area of a vessel.

**Comment:** Ammonia levels are legally to be kept below 25ppm on a crew work health and safety basis.

**Draft Recommendation 36:** That the standards require water to be provided ad libitum throughout the voyage (including days of loading and discharge). The standards should also prevent any water curfew prior to unloading in the northern hemisphere summer in Middle East ports.

**Comment:** The standards must prevent any acceptable water curfew prior to unloading in any ports due to very long waiting in loaded trucks to leave some ports/ very long transport times, especially in countries such as Russia and Turkey.

**Draft Recommendation 43:** That the standards require an AAV to accompany any export consignment where required by the department. Notwithstanding that, an AAV must accompany each consignment on long haul voyages, extended long haul voyages and voyages with pregnant livestock, unless otherwise agreed by the department.

**Comment:** Should read an AAV (Australian Government Accredited Veterinarian) on EVERY voyage, especially with pregnant animals, novel animals (camels, alpacas etc) and/ or Buffalo to determine their cause of high mortality compared to cattle.

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