

Review of the Australian Standards for the Export of Livestock. Stage 2: Draft Report

VALE Submission

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Technical Advisory Committee C/- Department of Agriculture and Water Resources GPO Box 858 CANBERRA ACT 2601

Dear Committee,

Thank you for the opportunity to make a submission to the Stage 2 Draft Report on ASEL.

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, especially with respect to heat stress and the limitations of ASEL v2.3.

VALE has contributed to each phase of the current ASEL Review in addition to making a submission to the Moss Review and the HSRA Review.

Yours sincerely

Joter

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1. INTRODUCTION AND GENERAL COMMENTS

VALE would like to acknowledge the large amount of work that has gone into preparing the Stage 2: Draft Report of the Review of the Australian Standards for the Export of Livestock (ASEL). However, whilst many of the recommendations would be considered substantial improvements over ASELv2.3, the actual effect of some of these recommendations would be quite minor and would not be expected to significantly improve animal welfare nor reduce risk of adverse incidents. Given that compliance with ASEL has never been adequately policed and that enforcement is likely to be impossible under current legislation (out of scope for this draft), it is imperative that ASEL standards are "generous" and not a bare minimum that is likely to be pared back by the exporters, if compliance occurs at all.

VALE is concerned by the repeated suggestions that change cannot be made because there are no peer-reviewed studies. Whilst peer-reviewed studies are ideal, some are not without flaws. For example one study undertaken to assess risk factors for cattle mortality between 1995 and 2012 (Moore et al 2015) excluded the most extreme mortality voyages as outliers. This was inappropriate given that the aim of the study was to identify mortality risk factors. Identification of extreme mortality risks should have been just as relevant as identifying the more routine risks. Whilst it was appropriate to exclude these outliers for statistical purposes, they should have been considered as a separate and very important data set. The causes of mortality on 7 out of the next 8 high mortality voyages that occurred after the end of this study, were the same as those of the excluded voyages, namely mechanical and ventilation issues and/or high seas (Foster 2016).¹

Apart from flaws that can occur in any scientific study, published live export studies are nearly always funded by government or industry which creates a conflict of interest (declaration of such is always now required in scientific journals because this conflict is recognised). In addition, the authors of independent reviews commissioned by the Australian government are not bound to disclose any conflict of interest or research funding sources. Both are routinely required for all presentations at major international veterinary conferences (e.g. American College of Veterinary Internal Medicine and European College of Veterinary Internal Medicine Conferences). Such disclosures could alert readers to any potential for unintentional bias to either welfare groups or industry depending on the main employment or research funding sources of the author(s). In addition, for truly independent literature reviews, the government should engage at least one scientist with no direct or indirect affiliations to the Australian government, Australian livestock industry or Australian animal welfare bodies.

In addition to actual study issues, some facets of animal welfare in live export may not lend themselves to systematic studies due to significant multifactorial variation, e.g. voyage types, distances, livestock involved, climatic conditions and ship factors. Careful independent and skilled analysis of the voyage data accumulated by the Department of Agriculture should be weighted highly as it is "in situ" data. In addition, the observations of shipboard veterinarians (AAVs), especially those experienced in the long haul trades, are paramount and should not be ignored purely on the basis of lack of systematic peer reviewed scientific literature.

Although not directly related to live export, the well-known and peer-reviewed paper by Smith and Pell (2003) published in the *British Medical Journal* should always be kept in mind (see

¹ High Mortality Voyages 44, 45 (2013), 50 (2014), 51, 52 (2014) and 56 (2015) Only one voyage, Voyage 54 (2014), was due to the main risk factor (BRD) identified by Moore et al (2015).

Figure 1). This study discussed what evidence there was for the fact that a parachute could prevent trauma due to gravitational challenge. This paper was an erudite comment on the 21st Century obsession with evidence-based medicine for the blindingly obvious to the exclusion of common sense. Another study also published in the *British Medical Journal* (Potts et al 2006) stated that "Waiting for the results of randomised trials of public health interventions can cost hundreds of lives, especially in poor countries with great need and potential to benefit. If the science is good, we should act before the trials are done." One needs to keep both these papers in mind when assessing the live export trade. The obvious point being that if there is inadequate information or studies for analysis, then rational common sense (based on pertinent observations and scientific principles) should prevail. The animal and not the exporter must always be given the benefit of the doubt. It is important to emphasise that ASEL was created to protect animals not to facilitate the trade.

Figure 1: Abstract of the study by Smith and Pell (2003)

Abstract

Objectives To determine whether parachutes are effective in preventing major trauma related to gravitational challenge.

Design Systematic review of randomised controlled trials.

Data sources: Medline, Web of Science, Embase, and the Cochrane Library databases; appropriate internet sites and citation lists.

Study selection: Studies showing the effects of using a parachute during free fall. **Main outcome measure** Death or major trauma, defined as an injury severity score > 15. **Results** We were unable to identify any randomised controlled trials of parachute intervention. **Conclusions** As with many interventions intended to prevent ill health, the effectiveness of parachutes has not been subjected to rigorous evaluation by using randomised controlled trials. Advocates of evidence based medicine have criticised the adoption of interventions evaluated by using only observational data. We think that everyone might benefit if the most radical protagonists of evidence based medicine organised and participated in a double blind, randomised, placebo controlled, crossover trial of the parachute.

2. SPECIFIC COMMENTS ON DRAFT RECOMMENDATIONS

Draft Recommendation 1

That the standards prevent Bos taurus cattle from an area of Australia south of latitude 26° south being sourced for export on voyages that will cross the equator between 1 May to 31 October (inclusive), unless an agreed livestock heat stress risk assessment indicates the risk is manageable.

The committee cites an industry document (Perkins et al 2015) as supporting an argument that heat stress is not a major cause of mortality for cattle exported to the Middle East. It is concerning that the committee have not themselves examined and critically evaluated this document and the source literature for that document (Moore et al 2014; Moore 2014). Independent analysis of the original data and industry data from the voyages studied, indicates that this particular conclusion is not necessarily valid.

Moore and colleagues (Moore et al 2014; Moore 2014) found that of all the cattle necropsied only two had "heat stroke". The conclusion was that mortalities due to heat stress were uncommon. However, if a critical evaluation of this study is performed it is evident that:

- exporter enrolment was optional
- necropsies were only performed on 33% (20/59) voyages
- only 27% (197/742) of the animals that died on those 20 voyages had necropsies
- only 13% (97/742) of the animals that died had a deep probe thermometer measurement
- 14% (107/742) of the animals that died did so on a voyage that had a high mortality incident mainly due largely to heat stress
- the necropsy sampling rate on the 20 voyages varied from 3.8-90.4%. The voyage that had the lowest sampling rate (3.8%) was the only high mortality voyage included in the study. The main cause of the high mortality incident was heat stress.

The AAV for the one high mortality voyage (High Mortality Voyage 39) in the study clearly states in the End of Voyage report, that during the time of hotter passages [which the High Mortality Investigation report states is when the majority of the cattle died] "a number of animals were not postmortemed due to rapid putrefaction" (see Figure 2).²

Moore (2014) acknowledged the sampling bias in this study with 19/20 voyages necropsied by non-designated research staff and the dependency on AAVs to necropsy and collect samples. Moore (2014) cited time pressure on AAVs as one explanation for necropsies not being performed. In a heat stress incident, not only would a veterinarian not have enough time to perform the necropsies but necropsies are not actually always possible due to rapid autolysis of carcases under these conditions (as evident in every high mortality voyage incident in which heat stress has been identified as the major cause of death and clearly evident on this particular voyage). Moore cited optional exporter enrolment as one sampling bias but would probably not have been aware that some shipboard veterinarians have been advised not to mention "heat stress" as a cause of death if possible (AAVs to VALE pers comm). When comparing the careful End of Voyage Report on this high mortality voyage with the daily voyage reports (all obtained under the *Freedom of Information Act* 1982), it is clear

² See: <u>http://www.vale.org.au/high-mortality-voyages.html</u>. Accessed 22nd Nov 2018

that there was prolonged severe heat stress in all cattle on High Mortality Voyage 39. This may not have been immediately evident to Moore and her colleagues as they may not have possessed that voyage data.

Thus unintentional sampling bias with this study design would and obviously did bias this study against heat stress being identified as a major cause of shipboard mortalities. The conclusion that heat stress was not a major issue for cattle mortality when this degree of sampling bias was present and when heat stress was the major cause (or at the very least, a major contributing factor) to the only high mortality incident that occurred during the study period, suggests that both the extent of the sampling bias and the implications of the raw data were not recognised by the authors (and thus possibly, the committee).

Figure 2: Extract of a portion of the End of Voyage Report for High Mortality voyage 39

The mortalities of the cattle fell into several classes.

1. Animals that had shown no clinical signs but were found dead in the pens with no gross pathological signs on post-mortem.

2. Animals that were in backward condition / smaller than their pen mates / non eaters and who were transferred to hospital pens and subsequently died.

A] On post mortem these animals were found to contain little body fat and exhibited signs of fat mobilisation i.e. catechetic, gelatinous, depleted fat stores. Rumenal contents were subnormal. B] As above but with pneumonic lungs.

3. Animals that had lameness in one or more legs with single or multiple infected joints. On post mortem some of these animals had extensive tracts of necrotic / gangrenous tissue in the subscapular or sternal regions.

4. Animals that died in the pens and on post mortem showed gross pathological changes in the thorax, that is, extensive pleuro pneumonia with pleurisy and extensive adhesions between the pleural surfaces and the lungs.

5. Animals that died in the pens showing minimal pneumonic pathology but being diagnosed as having been terminally reduced by heat.

During the time of hotter passages a number of animals were not post mortemed due to rapid putrefaction.

The original load plan was for many more than the 9000 loaded and thus it was possible to significantly lessen the density of the penned cargo, for example, on all decks, pens that may have

VALE would request that the review committee carefully reads the PhD thesis of Dr Jo Moore (Moore 2014) and do this in conjunction with both the daily voyage reports (noting the respiratory rates \geq 80 breaths per minute from Days 16 to 36), End of Voyage Report and High Mortality Investigation Report from High Mortality Voyage 39³.

However, even if one ignores the publications by Moore and colleagues, the official government report for High Mortality Voyage 39 states: "All cattle exported from Portland were identified as *Bos taurus*. In the end-of-voyage report, the shipboard AAV commented on the high number of deaths of *Bos taurus* that had long winter hair coats and were exported from a Victorian winter through a Middle Eastern summer to Turkey."

The daily voyage reports from this voyage clearly show that the Portland cattle fared far worse than the Fremantle cattle. The mortality rate for the Fremantle cattle (approximately 25% of which were *Bos indicus*) did not exceed the acceptable mortality threshold. This document highlights the risk for *Bos taurus* cattle sourced below latitude 26° south for

³ See: <u>http://www.vale.org.au/high-mortality-voyages.html</u>. Accessed 22nd Nov 2018

voyages to the Middle East from May to October. The *Bos taurus* cattle acclimatised to the worst winter weather (the Portland cattle) with thick woolly coats succumbed when animals from Fremantle did not. It is not known whether this is because the winter climate for WA is milder (albeit still below 26° south) or whether the different mortality percentages actually reflected the composition of the two consignments with a much lower percentage of the atrisk *Bos taurus* in the Fremantle consignment.⁴

High Mortality Voyage 39 highlights why *Bos taurus* cattle should not be shipped from this latitude during 1 May to 31 October but it is not an isolated or historical incident. In 2018, two consecutive consignments of *Bos taurus* cattle exported by Phoenix Exports had high mortality due to heat stress when transported from Portland to China between May and October. The role of a cold front during loading was noted for the first event on the *Dareen* (similar to pre-export conditions for High Mortality Voyage 39). The mortality incidents were attributed to conditions at the Equator and highlight that with the current heat stress risk assessment (HSRA) model and an exporter who consistently claims best practice, adverse events are unavoidable in winter-acclimatised *Bos taurus* cattle from southern latitudes when crossing the Equator.⁵

There are compelling meteorologic, industry and scientific data that indicate that *Bos taurus* cattle from below latitude 26° south should not be exported across the Equator (let alone to the Middle East or beyond) from 1 May to 31 October 2018 (AVA 2018 a and b).

VALE Response:

VALE rejects this recommendation. Bos taurus cattle from an area of Australia south of latitude 26° south must not be sourced for export to the Middle East from 1 May to 31 October. Bos taurus is defined as being any animal that is known to be \geq 50% Bos taurus or likely to be \geq 50% Bos taurus based on phenotype.

Draft Recommendation 2

That the standards prevent pregnant Bos taurus cattle being sourced for export on voyages that cross the equator from 1 May to 31 October (inclusive).

VALE Response:

VALE agrees but recommends that *Bos taurus* cattle are defined as per VALE definition in Recommendation 1.

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).**

Note, new body condition scoring system for beef cattle goes from 0-5.

⁴ An analysis of the Fremantle consignment mortality by species was not performed. It is believed that only two *Bos indicus* cattle died on this trip. Thus it is possible that if all but two of the deaths from this consignment were *Bos taurus*, then the % mortality in the Fremantle *Bos taurus* consignment may also have exceeded 1%.

⁵ See: <u>https://thewest.com.au/business/agriculture/deaths-mar-china-cattle-trade-ng-b88870012z</u> Accessed Nov 22nd 2018

VALE Response:

As per Draft Recommendations 1 and 2, VALE recommends that that *Bos taurus* cattle are defined as per VALE definition in Recommendation 1.

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.

VALE commends the committee for expressly stating that there should be no discretion for the Department to allow the export of sheep with more than 25 mm wool. However, to limit this recommendation to wool sheep and provide exemption of hair sheep with no scientific evidence or shipboard evidence to support the validity of that decision is most concerning.

VALE wishes to draw attention to the fact that the definition of "hair sheep" is somewhat arbitrary with the West Australian Department of Primary Industries and Regional Development ⁶ noting that the fleece of hair sheep such as Awassi, Damara and Dorper are described as containing wool (See Figure 3). In addition, Dorper sheep are often loosely classified as being "wool type" or "hair type" and Van Rooy sheep were designed to have enough wool between their hair to withstand cold climatic conditions. If ASEL distinguishes between hair- and wool- sheep, these definitions and discrepancies will be problematic as will the issue of classification of cross-bred sheep (as noted by the committee). If only for reasons of absolute clarity and operational ease, all sheep should be considered similarly and have no more than 25 mm fleece.

Figure 3 Fleece characteristics of some hair sheep breeds⁷

Awassi Double coated, containing hair, heterotype, wool and kemp fibres; often coloured Damara Outer kempy coat, inner layer of wool; range of colours Dorper Wool and kemp; black head with white body, or all white (White Dorper)

Whilst, some hair sheep (Awassi) have been shown to be more heat tolerant than Merino sheep (Stockman 2006), it is evident from the footage available from the *Awassi Express* that hair sheep still suffer and died from heat stress in conditions of high temperature and humidity (see Figure 4 for one such image). The high mortality voyage reports have never indicated that hair sheep were spared or even less affected by heat stress despite deaths being analysed by class, e.g. Awassi sheep also died on the *Bader* (High Mortality Voyage 46) and Damaras and Van Rooys died on the *AI Messilah* (High Mortality Voyage 65).⁸

In addition, AAVs have reported to VALE that hair sheep are difficult to monitor for weight loss, rumen size, respiratory rate and even scouring due to excessive hair presence (and/or fat tail issues). Many voyage reports identify deaths from fly strike or hospitalisation of

⁶ See: <u>https://www.agric.wa.gov.au/livestock-parasites/control-lice-haired-and-fleece-shedding-sheep</u>. Accessed 22nd Nov 2018

⁷ See: <u>https://www.agric.wa.gov.au/livestock-parasites/control-lice-haired-and-fleece-shedding-sheep</u>. Accessed 22nd Nov 2018

⁸ See: <u>http://www.vale.org.au/high-mortality-voyages.html</u> Accessed 22nd Nov 2018

animals due to fly strike from Day 1⁹ and identification of breech strike in the fat tail hair sheep can be problematic. In addition, the End of Voyage Report of the *MV Murray Express* voyage from Port Kembla to Madagascar 2007/2008 (High Mortality Voyage 25)¹⁰ stated that long-haired goats could not be monitored for respiratory distress, ocular or nasal discharge due to excessive hair/ wool length.



Figure 4: Hair sheep showing heat stress on the *Awassi Express* (Image from Animals Australia)

VALE Response:

VALE rejects this recommendation based on difficulty with accurate definition of hair sheep, no scientific evidence that hair sheep have lower mortality rates on voyages affected by heat stress and that monitoring haired animals for other diseases can be extremely difficult when not shorn.

VALE recommends that no sheep with more than 25mm fleece are exported.

Draft Recommendation 5

That for sheep held in a paddock at the registered premises, the standard continue to require that they be 10 or more days off–shears when sourced.

VALE Response:

Agree.

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).

Sheep with shearing cuts and injuries are not fit to load for land transport (or live export) so should not be transported to the port, let alone loaded. However, the committee note that there will be failure of detection of shearing injuries at pre-export inspection. VALE have

⁹ See daily voyage reports received under Freedom of Information Act (1982) from voyages including High Mortality Voyage 65 (*Al Messilah* 2016) <u>http://www.vale.org.au/high-mortality-voyages.html</u> Accessed 22nd Nov 2018

¹⁰ See: <u>http://www.vale.org.au/high-mortality-voyages.html</u> Accessed 22nd Nov 2018

witnessed extensive shearing cuts on sheep transported to Fremantle Port (see Figure 5; others available on request). Daily Voyage Reports from routine and high mortality voyage also invariably detail hospitalisation of sheep with shearing injuries, e.g. from Day 1 on High Mortality Voyage 65 (*Al Messilah* 2016).¹¹

Figure 5: Shearing cuts on sheep transported to Fremantle Port for export on the *Ocean Drover* 3rd August 2012



VALE Response:

VALE rejects this recommendation. One clear day is inadequate between shearing and export.

VALE recommends that for sheep held in sheds at the registered premises, there should be a minimum of five 'clear days' between shearing and loading for export.

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.

Distal legs should be shorn to prevent the animals from collecting and holding wet faecal matter on their distal legs which can logically be expected to predispose these areas to skin disease under the conditions known to exist on ships.

VALE Response:

¹¹ See daily voyage reports received under Freedom of Information Act (1982) from High Mortality Voyage 65 (*Al Messilah* 2016) <u>http://www.vale.org.au/high-mortality-voyages.html</u> Accessed 22nd Nov 2018

VALE rejects this recommendation.

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.

It is important that this recommendation is assessed as per VALE's introductory comments about weight of evidence and observations. Given the general concern of those in industry, the concern noted by committee, the higher mortality rate of bulls (suggestive), the comments in industry reports (Hedlefs 1988, Banney et al 2009, Simpson 2012) and the logical and observational assessments including those noted by the AVA (AVA 2018a) that heavier cattle between 500 kg and 650kg are at increased risk, then it would be prudent to err on the side of caution and stipulate that 500kg is the maxium weight of cattle loaded.

In addition, care and consideration of the health and safety of sailors, stockpersons and veterinarians should be considered - the heavier the animal, the more difficult it is to manoeuvre and treat.

Note: Hedlefs (1988) provides detailed insight into issues facing transportation of heavy cattle and additional data on space for heavy cattle has been provided in the comment on Draft Recommendation 21. Professor Hedlefs scanned the document and provided it to VALE on request in 2016 after receiving permission to do so, thus it is surprising that the authors of the Independent Literature Review¹² were unable to access the document.

VALE Response:

VALE rejects this recommendation. VALE recommends that cattle over 500kg are not exported.

Draft Recommendation 9

That the term 'clear day' be defined in the standard as a full day (midnight to midnight) during which livestock are not subject to any feed or water curfew, and are not handled, treated (including shearing) or moved from their holding pens or paddocks.

VALE Response:

Agree.

Draft Recommendation 10

That the standards require sheep and goats to be held at the registered premises for five clear days, irrespective of the location and design of the registered premises, the time of year, or the length of the export voyage.

VALE is concerned that the committee have not considered evidence from all studies already performed in sheep. The committee would appear to have based their recommendations on one study by Barnes and colleagues (2018) which showed that, on average, it took five days in a feedlot for the majority of the sheep to transition to pelleted rations. This does not equate to 5 days being the appropriate minimum holding time as other factors may also be

¹² See: <u>https://haveyoursay.agriculture.gov.au/33007/documents/91281</u> Accessed 22nd Nov 2018

important. It is clearly stated in another study (Makin et al 2010) that "sheep assembled for 7 to 8 days had a lower risk of mortality than those assembled for 3 to 6 days (p96). Given that Makin and colleagues assessed sheep mortality in Portland and Adelaide shipments, both of which tend to have higher mortality rates than those from Fremantle (Norris and Norman 2012), it would be appropriate to favour this outcome-based data over a single-factor study performed in West Australian feedlots.

VALE Response:

VALE rejects this recommendation. VALE recommends the mandatory holding requirement be a minimum of 7 days.

Draft Recommendation 11

That the standards require all classes of cattle travelling on short and long haul 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 long haul voyages.

It is VALE's opinion that all classes of cattle should be held in registered premises for a minimum of 3 'clear days' to enable cattle to adapt to the pelleted food and for inspectors to identify bovine respiratory disease (BRD), shy feeders, diarrhoea and lameness before loading.

Bovine respiratory disease is a major identified cause of mortality and a most serious and time-consuming problem for onboard veterinarians and stockpersons. The common complaint from AAVs (to VALE and the Department, the latter evident in high mortality voyage reports) is that ill or at-risk animals should have been culled at the feedlot. Identification of all clinically ill animals may not be possible in the 2 clear days designated by the committee in Recommendation 11.

Likewise, lameness is also a significant cause of suffering and mortality in cattle and a difficult problem for onboard veterinarians and stockpersons. From high mortality voyage reports (eg High Mortality Voyages 61 and 64)¹³, it is clear that cattle with lameness and foot injury are not being identified prior to loading in the limited time available.

Adaptation to food is an issue for cattle. Shy feeders (typically younger smaller cattle) can be difficult to manage on board. Shipboard veterinarians have reported that these cattle are very predisposed to BRD, the main cause of mortality identified on routine voyages (Moore et al 2015). In addition, shy feeders may not have adapted sufficiently to feed to withstand the stress of heat and humidity in Gulf and Red Sea on long haul voyages. Poor or insufficient adaptation to pellet feeds can also result in diarrhoea (not detected due to short holding times).

VALE Response:

VALE rejects this recommendation.

VALE recommends that cattle be held at registered premises for a minimum of three clear days.

¹³ See: <u>http://www.vale.org.au/high-mortality-voyages.html</u> Accessed 22nd Nov 2018

Draft Recommendation 12

That the standards require buffalo to be held at the registered premises for a minimum of five clear days, irrespective of location of the premises, length of intended voyage or number of loading/discharge ports.

VALE recommends that a distinction should be made between buffalo which have been mustered from the wild and transported direct to the registered premises or buffalo which have been retained in yards on another premise. It is essential that these animals are acclimatised to both feed and human handling to minimise welfare impacts. According to the Australian Water Buffalo Manual¹⁴ some buffalo can adapt in a day or so, whilst others may take weeks and others may never settle. VALE is not able to recommend a specific time limit for holding these animals but suggests that animals are assessed to determine if they will respond appropriately to export based on calmness and handling response as well as feed adaptation.

VALE Response:

VALE rejects this recommendation.

VALE recommends further specific information should be included such as whether the buffalo are derived direct from the wild or have been retained on property and that additional assessment criteria are applied before loading buffalo.

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.

As per VALE comments on Draft Recommendation 10: a minimum of 7 clear days is required for sheep based on an industry study into mortality from Portland and Adelaide (Makin et al 2010).

VALE Response:

VALE rejects this recommendation.

Draft Recommendation 14

That the standards continue to require pelletised feed to be fed in troughs at the registered premises, and that feeders/troughs be of a design that prevents spoilage of feed, particularly during inclement weather. For sheep and goats held at registered premises in southern parts of Australia the standards should require they be fed from fully sheltered troughs, regardless of the time of year.

VALE Response:

Agree.

Draft Recommendation 15

That the existing pregnancy–related rejection criteria and pregnancy testing criteria be retained in the standards, other than:

a. the testing criteria relating to 'maximum days pregnant' for all livestock exported by sea, which should be amended to apply at the scheduled date of discharge, rather than the

¹⁴ See <u>The Australian Water Buffalo Manual</u> page 53

scheduled date of departure, to ensure that livestock cannot be exported in the third trimester; and b. the provision relating to Damara female sheep, which should be extended to apply to all female fat tailed sheep.

VALE Response:

Agree.

Draft Recommendation 16

That the definition of a competent pregnancy tester be amended to cover persons permitted to undertake pregnancy testing by law in any state or territory jurisdiction, rather than just persons in the Northern Territory and Western Australia. For clarity, the circumstances in which competent pregnancy testers are permitted remains unchanged.

VALE recommends that pregnancy testing of cattle, buffalo, camelids and deer for live export should be performed by registered veterinarians. Whilst a veterinary degree does not necessarily translate to pregnancy testing competency (thus the National Cattle Pregnancy Diagnosis Scheme for cattle), a veterinary degree is preferable to the current standards required for non-veterinary "accredited cattle pregnancy testers". Veterinarians have legal obligations to conduct veterinary procedures with competence. Lay persons do not.

Regardless, VALE recommends that pregnancy testing of both breeder and slaughter cattle should only be performed by veterinarians accredited under the National Cattle Pregnancy Diagnosis Scheme. There are no valid scientific reasons for the committee to suggest that this is necessary on animal welfare grounds for breeder cattle and not slaughter cattle. Animal welfare issues for pregnant cattle (and any offspring) on board ships are identical for both.

Pregnancy diagnosis of sheep and goats by transabdominal ultrasound by lay testers is appropriate but is only useful if animals are individually identified with accuracy and traceability. Exporters invariably explain that onboard pregnancies in sheep are due to misidentification and not poor pregnancy testing (e.g. essentially sheep substitution) and this situation cannot continue. Pregnancy status must be recorded and linked to an individual radiofrequency identification device (RFID) code for all animals.

Lay pregnancy testing cannot be recommended for cattle, buffalo, camelids or deer.

VALE Response:

VALE rejects this recommendation.

Draft Recommendation 17

That the standards allow the department to extend the validity of a pregnancy test beyond 30 days only where necessitated by circumstances outside the exporters control and where the exporter can demonstrate that the extension will not impact on animal welfare outcomes. That decision should be delegated to regional veterinarians, rather than requiring a formal dispensation from the Canberra office.

VALE does not believe it adequate or even likely that exporters can demonstrate that an extension beyond 30 days will not impact on animal welfare outcomes. Exporters are businessmen. They are not animal welfare scientists or veterinarians so there is no logical

basis for assuming their competency in the field of animal welfare. In addition, all evidence available indicates that exporters have failed to self regulate, thus the whole basis for ASEL as recommended by Keniry (2004)¹⁵. Given all the evidence available including the Moss Review (2018),¹⁶ it is naïve and unwise to place discretionary animal welfare decisions in the hands of the exporters or the Department. VALE supports the recommendations made by the AVA (2018a) regarding extensions (e.g. extended to beyond 30 days, to a maximum of 45 days only when circumstances require and pregnancy testing is conducted by Pregcheck®-accredited veterinarians).

Pregnancy status in this situation must be recorded and linked to an individual RFID code.

VALE Response:

VALE rejects this recommendation.

VALE suggests that the recommendation be changed to: The validity of the pregnancy certification be extended beyond 30 days to a maximum of 45 days when circumstances require only if pregnancy testing is conducted by Pregcheck®-accredited veterinarians and if the animals are accurately identified by RFID code.

Draft Recommendations 18 and 19

18. That the standards require that sheep and goats held at a registered premises for any period of time and in any group size be given a minimum space allocation of $0.5m^2$ per head, with an additional $0.006m^2$ for each 1kg increase in bodyweight above 54kg (as the threshold already specified in the standard).

19. That the standards for stocking density in registered premises remain unchanged for cattle and buffalo.

Different registered premises will have different space requirements depending on multiple factors including animal type and class, shelter, ventilation and environmental conditions. VALE does not have sufficient information or knowledge about the premises to make accurate comment and can only recommend that stocking density in registered premises should be at least referable to equivalent industry standards (e.g. Australian Animal Welfare Standards and Guidelines for sheep (2016)¹⁷ which also state that a "person in charge must ensure sufficient space to allow all sheep to lie on their sternums at the same time in an intensive production system".

VALE Response:

VALE has insufficient information to comment and recommends that the space requirements in registered premises must be, at the very least, referable to equivalent Australian industry standards.

¹⁵ See: <u>http://www.agriculture.gov.au/SiteCollectionDocuments/animal-plant/animal-</u>

welfare/trade/export-transport-review/keniry_review_jan_04.pdf Accessed 22nd November 2018 ¹⁶ See: <u>http://www.agriculture.gov.au/SiteCollectionDocuments/export/moss-review.pdf</u> Accessed 22nd November 2018

¹⁷ See: <u>http://www.animalwelfarestandards.net.au/files/2011/01/Sheep-Standards-and-Guidelines-for-Endorsed-Jan-2016-061017.pdf</u> Accessed 22nd Nov 2018

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.

As discussed by VALE in previous submissions, the space allocations for both sheep and cattle were never based on animal husbandry studies.

The only scientific analysis of space allowance indicates that a k value of 0.033 is the **minimum** required (Petherick and Phillips 2009). A k value of 0.033 on all voyages is based on natural behavioural space requirements and the unacceptability of 'timesharing' for resting space. It does not take into account difficulties in accessing troughs. Whilst a k value of >0.033 (e.g. 0.047) would be VALE's preference, the minimum likely to be required for adequate welfare is 0.033.

The committee state that after consideration of research findings (not referenced and with a "paucity of evidence" noted also by the committee in the preceding paragraph) and Stage 2 submissions (some of which were from industry) that they believe that the appropriate k value is between 0.027-0.033. In VALE's opinion, the committee's decision for a k value of 0.030 is an unjustified compromise in the favour of industry and not the animals for which these standards purport to protect.

As the AVA states, **there is no current scientific justification to reduce the k value below 0.033** (AVA 2018a). Thus, in line with VALE's introductory comment, the animals should always be given the benefit of the doubt and a k value or 0.033 should be the very minimum space allowance for all livestock.

VALE Response:

VALE rejects this recommendation. VALE recommends that the k value for sheep should not be reduced below 0.033.

Draft Recommendation 21

That the standard adopt an allometric approach for calculating on–board 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.

VALE notes that the effect of space allocation for cattle has actually been studied under voyage conditions (Hedlefs 1988).¹⁸ This study identifies the fact that the space requirement for cattle in 1988 was more generous than the current ASEL (e.g. $2m^2$ vs $1.63m^2$ for 600kg cattle) (Hedlefs 1988). Hedlefs (1988) compared mortality when the space for heavy bullocks was increased from 2.4 to $3m^2$ and found a significant reduction in mortality. VALE believes this was the first assessment of the effect of space on mortality in live export cattle voyages. It is significant that the "baseline space" was likely to have been higher than both the current ASEL and a space allocation calculated with a k value of 0.033 although the actual weights of cattle tested weren't provided (e.g. for 800kg cattle, space allocation using a k value of 0.033 is 2.7 m²).

¹⁸ Note: this study was funded by "Shipboard Veterinary Clinical Service", a group that was established prior to Livecorp.

The study by Hedlefs (1988) provides much observational data. Discussion of difficulties of trough access due to pen layout, cattle character and stocking density was provided. Whilst some of the cattle would be heavier than those routinely carried, it is an important document with which to assess space allowance and provides strong evidence that a k value of 0.033 is the absolute minimum (and probably inadequate). In addition, Professor Hedlefs gave VALE the following comment (pers comm): "The majority of my findings were it was difficult conditions for the cattle, heavyweight (500+ kg) bullocks of angus type with some Hereford and murray grey type and a pen of droughtmasters on one voyage. They have been in feedlots on the Darling downs for months in winter chilly weather before loading. Within four days (total voyage times around 21 days) the environment was at saturation humidity and over $34^{0}C$The real benefit came on subsequent voyages when space allocations were increased for these cattle and they could be effectively ventilated by the shipboard systems."

VALE Response:

VALE rejects this recommendation.

VALE recommends that the k value for cattle should not be reduced below 0.033.

Draft Recommendation 22

That the relation to special categories of livestock, the following approach should apply to onboard stocking densities –

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

b. Cattle and buffalo with horns: 30 per cent more space than otherwise required for cattle and buffalo without horns.

c. Cattle and buffalo from 650kg and above: additional space allowance as determined by an approved heavy cattle/buffalo management plan.

d. All pregnant cattle and buffalo: a minimum of 15 per cent more space than otherwise required for cattle and buffalo for a given liveweight and voyage.

e. Rams and goats with horns: 10 per cent more space than otherwise required for sheep and goats.

Re 22a, in addition to increased space, a veterinarian should be mandatory on every live export voyage carrying buffalo to assess the adequacy of the space allocations and investigate the cause of higher mortalities in this livestock class. It is imperative that a trained animal health professional is present to observe, treat and provide necropsy information on this class of animal.

Re 22c, VALE believes that cattle from 650kg and above should not be transported (as per Draft Recommendation 8).

VALE Response:

VALE accepts 22a but recommends that in addition to increased space allowance, a veterinarian accompany every buffalo shipment to assess adequacy of this space allocation in addition to other investigations.

VALE rejects 22c as per Draft Recommendation 8.

VALE has insufficient information to comment on 22b, d and e.

Draft Recommendations 23-25

23. That the standards be revised to require the application of an agreed heat stress risk assessment for all livestock voyages that cross the equator, at all times of the year, from all Australian ports.

24. That once the (separate) review of the heat stress risk assessment model is completed, the testing criteria in the standards should be revised to support the new model.25. That the period 1 May to 31 October continue to be applied as defining the 'northern summer' in the relevant sections of the revised standard.

The committee states that there seems little doubt that the introduction of the HRSA has been a contributing factor in reducing mortalities over time. In actual fact, high mortality events on individual voyages in the early 2000s also resulted in substantial changes to the actual selection of animals and management during the whole export process (Stinson, 2008). VALE would thus question the assertion that HSRA had reduced sheep mortality. The HSRA was introduced in 2003 and been revised a number of times since then, presumably with improvements being made each time. If one accepts the industry figures for mortality (and there is some evidence that these are incorrect¹⁹ and refers to Shipboard Performance Reports (Norris and Norman 2013, Norman 2017), then it is evident that the shipboard mortality for sheep has been essentially static with mortalities of 0.75% (in 2004) to 0.97% between 2003 and 2012 and 0.62% (2015) to 0.97% from 2007 to 2016 with a mortality rate of 0.8% in 2016. Whilst there is a slight downward trend over 10 years in the most recent shipboard performance report (Norman 2017), it is unlikely that the yearly mortalities are statistically different from one another. The trend over the last 10 years was helped by one rather low sheep mortality rate of 0.62% in 2016. The sheep mortalities in 2004, 2008, 2011, 2012 and 2016 are all essentially the same and are probably a more realistic snapshot of the static nature of average annual shipboard mortalities in sheep over the last 14 years despite the claimed benefits of the HSRA. In addition, the HSRA has failed comprehensively to prevent significant numbers of high mortality voyages²⁰ and almost certainly has failed to prevent morbidity due to heat stress.

VALE's recommendations regarding the HSRA can be found in VALE's submission to the HSRA Review. Both the AVA and VALE recommend that sheep are not exported from Australia to the Middle East between 1 May and 31 October.

VALE Response:

VALE is unable to support Recommendation 23 without the inclusion that all sheep shipments cease between 1 May to 13 October.

VALE is unable to support Recommendation 24 without first assessing the revised HSRA model.

VALE supports Recommendation 25

Draft Recommendation 26

That the reportable mortality level for sheep and goats should be reduced to 1 per cent, or three animals, whichever is greater; and that an average daily mortality rate of greater than 0.05 per cent be added to the list of events that would qualify as a 'notifiable incident'.

VALE Response:

Agree.

¹⁹ See: <u>http://www.agriculture.gov.au/SiteCollectionDocuments/export/moss-review.pdf</u>. Accessed 22nd Nov 2018

²⁰ See: <u>http://www.vale.org.au/high-mortality-voyages.html</u> Accessed 22nd Nov 2018

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'.

Given the current mortality percentages reported on cattle voyages, it is appropriate to reduce the long-haul voyage (>10 day) reportable mortality to 0.5%. Given that it is stated that 0.5% is "some six times the three year average of 0.08%" on shorthaul voyages, it is then inappropriate that the reportable mortality for short haul voyages (up to 10 days) has not been reduced in line with the long haul sheep and cattle reportable limits. To be consistent with other reportable mortality reductions, and appropriately aligned with current industry figures, short haul voyages of up to ten days should have a reportable mortality level of 0.25%.

VALE Response:

VALE rejects this recommendation.

VALE suggests halving the current reportable percentage mortality that would qualify for a 'notifiable incident' for both long-haul and short-haul voyages.

Draft Recommendation 28

That the requirements for daily reports and end of journey reports be updated as per Appendix A and Appendix B in this report including:

a. Inclusion of more detailed welfare monitoring in daily reports based on an assessment of at least 1-2 pens of sheep, cattle, buffalo and goats representative of each class or line, per deck as well as a welfare assessment for any 'at high risk pens' or 'pens of concern'.

There is no information as to what constitutes 'at high risk pens' or 'pens of concern'. Specific criteria and/or examples should be provided as the wording currently is not sufficiently defined.

Re Appendix A Section 9:

There is currently no provision to monitor and report on shy feeders or development of lameness. Both must be included as both are significant welfare issues and contribute to morbidity and mortality. These issues must be noted in these sample pens in addition to being detailed in the hospital pen section so that both incidence and prevalence can be accurately assessed.

Given that the heat stress threshold for sheep is exceeded at McCarthy Panting Score 2 (VALE Submission HSRA Issues Paper 2018), then the wording below panting score **must** be: "If any animals at panting score ≥ 2 , describe percentage of animals in pen at each panting score; approx how many pens have animals ≥ 2 ." This is absolutely necessary given the McCarthy Review (2018)²¹ and the Moss Review (2018)²² recommendations which emphasise that morbidity must be monitored, analysed, assessed and minimised. It is not adequate to merely detail animals in severe heat stress, i.e. panting score ≥ 3 .

²¹ See: <u>http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/live-animals/mccarthy-report.pdf</u> Accessed Nov 22nd 2018

²² See: <u>http://www.agriculture.gov.au/SiteCollectionDocuments/export/moss-review.pdf Accessed</u> Nov 22nd 2018

Re Appendix A:

There should be a section asking for information regarding any issues with deck cleaning and any ventilation breakdowns, fan malfunctions or blackouts affecting ventilation and the time-frame of events to the point of rectification (so that these can be assessed against the animal data).

Re Appendix A or Appendix B:

Treatment records must be submitted with either Daily Voyage Reports or the End of Voyage Report. Information is required on the types of illness, treatment given and treatment duration. With the appendices supplied there is no requirement to detail the actual treatment given. This is critical as veterinarians are not on every ship and it is evident that drug doses administered by stockmen are not necessarily appropriate for the conditions (See High Mortality Voyage 61).²³ In addition, Australia has a prescribing responsibility in animals intended for slaughter to carefully record all drug administration so that appropriate with drawal times can be followed (Foster 2018). This is also imperative with respect to Australia's National Antimicrobial Resistance Strategy (Foster 2018).

It should also be mandatory to report shipboard fires. VALE knows of at least two shipboard fires that were not reported. Recent large shipboard fires have fortunately occurred on unloaded vessels in port (*Awassi Express*²⁴ and *Ocean Drover*²⁵) but with grain storage, fire risks are real and fires have been the cause of some of the worst historical Australian shipboard mortality events (*Farid Fares* and *Uniceb*). There is no provision currently for this in Appendix A and in Appendix B, "maintenance issues and equipment failure" does not specifically cover this type of event.

Re Appendix B:

The number of animals that died and the number of necropsies performed should be detailed so that both the mortality rate and the necropsy sampling rate are clearly detailed. There should also be a requirement to provide details of situations in which animals could not be attended for either treatment or necropsy.

VALE Response:

VALE supports this recommendation in principle but rejects the current suggested appendices, Appendix A and Appendix B. VALE recommends that criteria be provided regarding "at high risk pens" and that specific sections be added as per the above concerns.

Draft Recommendations 29-30

29. That the standard require bedding management, including deck wash downs and replacement of bedding materials, to be sufficient to ensure good welfare outcomes for livestock, in particular, minimising slipping and abrasions, lameness, pugging and faecal coating.

30. That the standard require the consistency and depth of bedding material to be routinely monitored.

²³ See: Documents from Voyage 61 available on <u>http://www.vale.org.au/high-mortality-voyages.html</u>. The stockman used 10ml tolfedine to treat lameness in cattle well above 200kg (the dose of tolfedine is 5ml/100kg).

 ²⁴ See: <u>https://www.marinetraffic.com/en/maritime-news/article/4126</u> Accessed 22nd Nov 2018
 ²⁵ See: https://www.atsb.gov.au/media/5769859/mo-2014-012-final.pdf Accessed 22nd Nov 2018

VALE is concerned that the phrase "sufficient to ensure good animal welfare" is inadequately defined. Apart from the relatively vague terminology, it is likely that different bedding will be required for different stock classes (e.g. heavy cattle, breeder cattle), different climatic conditions (heat, humidity, expected rough passage) and long haul voyages. Both veterinarians and stockpersons need some visual guidelines as to what constitutes adequate bedding for each class of voyage and also a standardised scoring system for monitoring.

VALE Response:

VALE agrees in principle but recommends:

- visual guides be developed to help with assessing "sufficient" bedding coverage in pens
- appropriate scoring systems for monitoring consistency, depth and condition of bedding be established.

Draft Recommendation 31

That the sheep manure pad continue to be used as the preferred bedding approach for sheep, but that the standards require a sufficient amount of sawdust, rice hulls or similar material be carried to manage moisture in the sheep manure pad, avoid slippage during loading and unloading, and manage incidents such as pen flooding. The necessity and adequacy of the amounts carried should be tested over the next 12 months, with adjustments to this requirement made on the basis of evidence obtained through daily and end of voyage reporting.

VALE Response:

Agree.

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 1000m² per application, with a minimum of 4 tonnes per 1000m² provided after each washdown.

The recommendation for bedding in the pens appears to be an improvement on the current ASEL requirement. However, it is difficult for VALE to assess the adequacy based on kg/square metre as the different bedding materials described have different texture and density/weight. VALE believes that some visual scoring/assessment scheme is required for bedding as it will also be very difficult for AAVs, stockpersons and independent observers to calculate how much bedding is required for each pen. Exporters are responsible for provision of adequate bedding and the veterinarians and stockpersons are not privy to how many tonnes of bedding are loaded. Currently, personnel assess how much is on board (with no knowledge of actual tonnage), divide that by how many applications are likely to be required and then just distribute to each deck based on how much there is to "go round". This is likely to continue with the current wording. VALE recommends that the committee state how much pen coverage this is expected to provide to assist the personnel on board to apply the correct amounts, assess whether the correct amounts have actually been loaded and to help with ongoing analysis of adequacy.

In addition, there is a requirement over and above pen space for bedding material to be used on ramps and alleyways at loading and discharge that has not been, and should be, specified.

VALE Response:

VALE cannot assess the overall adequacy of this recommendation. However, if this bedding provision is deemed by the committee to be adequate, then VALE recommends that the committee must provide clear guidelines as to how much pen coverage this is expected to provide to assist with onboard management and ongoing assessment of bedding adequacy. Provision must be made for ramps and alleyways at loading and discharge over and above the stated draft recommendation.

Draft Recommendation 33

That bedding requirements for extended long haul voyages be agreed in the long haul management plan.

VALE Response:

Agree in principle but these requirements must be defined by the committee.

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.

It is clearly stated that ammonia levels above 25 ppm are harmful to animals. Ammonia levels are already required to be kept below 25 ppm on a human health and safety basis. However, the issue is not just the actual measured ammonia concentration but the time of exposure to that concentration. The average exposure for Australian workers should not exceed 25 ppm Time Weighted Average (TWA: the average exposure during an 8 hour day; Pines and Phillips 2011). Given that personnel are likely to be exposed to these conditions for greater than 8h, a more appropriate level would be calculated on the basis of TWA for human exposure (thus likely to be substantially lower than 25 ppm given that there will be >8 hours of exposure). In addition, ammonia levels must be regularly (ideally continuously) monitored on all decks and recorded.

Note: the upper level of ammonia acceptable in intensive piggery and poultry operations is 20 ppm thus this would seem a preferable recommendation.

VALE Response

VALE rejects the current recommendation as it appears to be in contravention to human health and safety requirements. Designated ammonia concentrations cannot exceed those required for human health and safety for both the personnel and, by extension, the animals which, unlike the personnel, get no respite from these conditions. Ammonia levels must be defined by both an upper limit and a TWA.

Draft Recommendations 35-40

35. That the standards require that all livestock be offered feed and water as soon as possible after being loaded on the vessel, and at the very least within 12 hours.
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.
37. That the standards require that for voyages of 30 days or less, at least 1 per cent of the

fodder required for cattle must be chaff and/or hay. For voyages of 31 days or more, at least 2 per cent of the required fodder must be chaff and/or hay.

38. That in relation to 3A.3.2, the 'anticipated needs of the animals' must include expected days of loading and discharge, rather than applying from the time of departure.
39. That in relation to 3A.3.2, the statutory reserve should be increased to 4 days for all voyages longer than 10 days, regardless of species (while maintaining the current requirement for a 7 day fodder reserve for all voyages travelling through the Suez Canal).
40. That the standards are further reviewed without delay once current studies into fodder quality, quantity and pellet specifications are completed.

VALE agrees in principle but believes a discrepancy exists between Recommendation 35 and Recommendation 36 which states that water must be provided ad libitum throughout the voyage including days of loading and discharge. There is no justification or logical reason why livestock should be deprived access to water for up to 12 hours after loading.

VALE Response:

Recommendation 35: VALE recommends rewording as follows: "That the standards require all livestock be offered feed as soon as possible after being loaded on the vessel and at the very least within 12 hours.

Recommendations 36-40: Agree.

Draft Recommendations 41 and 42

41. That the standards continue to require an accredited stockperson to accompany each consignment of livestock.

42. That the standards require one competent stock handler (as defined in the reformatted standards) per 3,000 (or part thereof) cattle and buffalo, and/or one per 30,000 (or part thereof) sheep. The standards should allow the accredited stockperson to count towards this requirement.

VALE Response:

VALE acknowledges that this is an improvement on the current requirements but the adequacy should be assessed by careful analysis of independent observer reports and changes made to the minimum number of stock handlers required if this is demonstrated to be inadequate.

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.

VALE does not believe that on current evidence (Moss 2018)²⁶, the Department are an appropriate body to determine when an AAV is required to accompany a shipment. If a veterinarian is not required on every ship then the committee must specify which voyages require veterinarians, not the Department.

²⁶ See: <u>http://www.agriculture.gov.au/SiteCollectionDocuments/export/moss-review.pdf Accessed</u> Nov 22nd 2018

Both VALE and the AVA²⁷ have consistently called for a veterinarian on every ship (and for that veterinarian to be independent of the exporter). There are no valid reasons at all as to why a veterinarian should not be present on every ship. It is imperative that a veterinarian be present for reasons of:

- animal health
- animal welfare
- disease investigation, surveillance and monitoring
- biosecurity
- to ensure compliance with Australia's antimicrobial resistance strategy
- to provide quality assurance for export markets.

It is completely inappropriate that a stockperson with a **four day training course**²⁸ be assigned and expected to perform these veterinary duties that are well beyond their training and abilities. When one scans the high mortality voyages that have no causes identified, they have nearly all been voyages without veterinarians.²⁹ Skilled necropsies and disease investigations can only be effectively performed by trained health professionals. If this version of ASEL is to ensure good animal health and welfare then it is essential that veterinarians be present on every voyage irrespective of length.

If veterinarians are not going to travel on every voyage, then:

- they should, as per previous Department directives, accompany every voyage over 10 days
- 2) there must be an onboard veterinarian for camels, alpacas and buffalo.

With respect to point 1, it should be noted that the accepted practice until recently (EAN 2016-14)³⁰ was always to have a veterinarian accompany voyages of 10 days or longer (long-haul). With the opening up of the cattle trade to China, however, the Department has dropped this recommendation and conveniently redefined long-haul as being to the Middle East or beyond. It is evident that some voyages to China are as long, or in some cases longer, than voyages to the Middle East. A veterinarian should be required to accompany all such voyages as there have been issues with heat stress, BRD and climatic conditions noted on some of these voyages.

VALE Response:

VALE rejects this recommendation.

VALE recommends that an independent veterinarian accompany all voyages irrespective of duration.

VALE would accept an exporter-employed veterinarian on all voyages as an alternative provided that an independent observer is present in addition to the veterinarian.

If the committee do not deem it mandatory to have a veterinarian on every live export ship, then VALE would recommend in addition to the current requirements, that a veterinarian

 ²⁷ See: <u>https://www.ava.com.au/policy/151-live-animal-export</u>. Accessed 22nd Nov 2018
 ²⁸ See:

http://www.pgaofwa.org.au/events/Livestock+Export+Stockperson+Accreditation+Course+%25E2%2 580%2593++3+to++6+July+2018 Accessed 22nd Nov 2018

²⁹ http://www.vale.org.au/high-mortality-voyages.html Accessed 22nd Nov 2018

³⁰ See Export Advisory Notice 2016-14, 22 April 2016, Veterinarians accompanying livestock by sea.

must accompany all voyage over 10 days duration irrespective of destination and all voyages carrying camels, alpacas and buffalo.

Draft Recommendation 44

That the standard not allow the same person to be both the AAV and the accredited stockperson for any given voyage.

VALE Response:

Agree.

Other Recommendations

pp 56-57

VALE Response: Agree.

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