



19 October 2018

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

To whom it concerns,

RE: Heat Stress Risk Assessment Review

("HSRA") review for livestock exported from Australia by voyage.

The organisation representing the interests of its 8,000 farmer members from across **across**, including farmers who produce livestock for the \$1.4 billion livestock export industry.

and demonstrates positive animal welfare outcomes. Australia is a leader in animal welfare 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 global market. 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.

scientific evidence and enhance animal welfare outcomes. To ensure animal welfare is furthered, any changes must be subject to a rigorous due-diligence process and not implemented prematurely, as this could adversely impact their effectiveness.

The **Management** has provided a response to the specific areas raised in the HRSA Issues Paper to achieve these priorities.

Mortality limit and heat stress threshold

support requirements to achieve positive animal welfare outcomes on-board live export vessels. Appropriate preparation and planning is essential to ensuring high quality animal welfare outcomes are achieved during the voyage.

The current HSRA assesses whether a planned voyage has less than a 2 per cent chance of a 5 per cent mortality incident. The McCarthy Review recommended that industry transition to an approach that estimates the risk of heat stress to promote better animal welfare. The revised model would assess

heat stress through a holistic approach, by considering animal welfare indicators such as; panting scores, respiratory rates and appearance.

These changes have the potential to include subjective data and measurements into the tool, as the assessment is dependent on each individual assessor's interpretation. To ensure the HSRA remains an effective regulatory tool capable of producing consistent results, no changes should be adopted until they are supported by clear scientific evidence and assessments can be undertaken objectively. This may mean an appropriate HSRA model may not developed prior to the 2019 Northern Hemisphere summer but it is essential that changes are not made without clear and objective evidence.

To enhance the current HRSA model and transition towards predicting heat stress as opposed to mortality, a heat stress threshold (HST),¹ could be included. The inclusion of a HST could be assessed objectively and would promote improved animal welfare by reducing the temperature that livestock are exposed to during the voyage. To be effective the HST must account for factors that affect an animals' ability to deal with heat such as; body condition, coat and acclimatisation.

• Stocking Densities

supports stocking densities that promote quality animal welfare outcomes, based on robust scientific evidence.

The McCarthy Review proposed to reduce the stocking density during high risk periods, subject to the vessels ventilation or pen air-turnover ("PAT"). The new conditions seek to reduce stocking densities allowable under the Australian Standards for the Export of Livestock ("ASEL") by 17.5% and also require independent audits of a vessel's PAT.

These changes to the stocking density requirements are likely to encourage exporters to utilise vessels with better technology and ventilation. The **support** support the principle of this new approach and the key is ensuring that in practice it delivers scientifically based and 'fit for purpose' stocking density requirements, and that standards are no set to hinder the economic viability of the trade.

The **matrixed** appreciates the opportunity to comment on the proposed changes to the HSRA and reinforces that any amendments must be based on clear scientific evidence to ensure that good animal welfare outcomes are achieved.

If you would like further information please contact

Yours sincerely,



¹ An animal's HST is the maximum wet-bulb temperature at which the animal can self-regulate its core body temperature by body heat loss mechanisms such as perspiration.