



AUSTRALIAN LIVESTOCK
EXPORTERS COUNCIL

18 October 2021

Tina Hutchison
Principle Regulatory Officer
Plant & Live Animal Exports Branch
Department of Agriculture, Water and the Environment
Canberra ACT 2601

By email: aselreview@awe.gov.au

Dear Ms Hutchison

Re: Review of the Australian Standards for the Export of Livestock version 3.2

The Australian Livestock Exporters' Council (ALEC) is a member-based, peak industry body representing Australia's livestock export sector which contributes over \$1 billion in export earnings annually while employing 13,000 mainly regional Australians. ALEC provides strategic direction to the industry, sets industry policy and represents Australia's livestock export trade in Australia and internationally.

ALEC members account for more than 96 per cent of Australia's annual livestock exports, by volume and value. ALEC's membership also extends to supply chain participants including registered premise operators, ship owners, feed suppliers and other service providers to the trade all are significantly affected by the Australian Standards for the Export of Livestock (ASEL). As such, ALEC welcomes this opportunity to comment on the Department of Agriculture, Water and the Environment's (DAWE) 2021 update of ASEL.

As a sector, the livestock export industry is one of the few in agriculture that is 100 percent exposed to the export market, and therefore 100 percent exposed to its regulation. The implementation of ASEL 3.0 on 1 November 2020 had a significant impact on the commerciality of parts of the sector. Particularly considering the industry runs on incredibly tight margins and exporters bear considerable financial risk with each shipment. Consequently, poor, unfair and unnecessary regulatory outcomes only heighten that financial risk which may be an inhibitor to trade.

Such an approach does not reflect the critical importance of the industry to the broader livestock production sector. An industry that was valued at \$1.8 billion in 2018-19, representing approximately 10% of all red meat export receipts.

It is very disappointing that ALEC continues to raise many of the issues outlined in this submission, and some instances have been doing so for years, without any progress towards a solution. This is despite the livestock export industry repeatedly presenting solutions supported by data and evidence. These issues continue to unnecessarily cost industry, despite being administrative or technicalities that do not substantively impact voyage animal welfare outcomes.

In setting regulatory standards, it is important to note that much of what ALEC proposes in this submission are minimal standards. ALEC notes many of its members continually exceed these standards. The following comments are from feedback received from ALEC members in a forum

undertaken jointly with LiveCorp and should, as such, be read in conjunction with the LiveCorp submission:

- *Definitions - Near markets*

- Near markets are defined as destination ports located south of latitude 15°N, east of longitude 90°E and west of longitude 180°. This definition divides Vietnam, Australia's second largest live cattle export market in two with southern Vietnam a near market and northern Vietnam far.

Undertaking an export voyage to northern Vietnam with significantly less cattle than a voyage to southern Vietnam is simply uneconomic and may potentially result in perverse animal welfare outcomes by increasing the use of domestic transport from southern to northern Vietnam.

This definition fails to take into account factors other than geological location that have a greater impact on the likelihood or otherwise of adverse animal welfare outcomes. This includes vessel characteristics such as the speed in which a voyage would be undertaken and departure ports.

In terms of departure ports, the difference in voyage duration from Townsville to Vietnam's southernmost ports in the Ho Chi Mihn vicinity and the northernmost port Cai Lan, is a day at most. Two if departure is from Fremantle. Furthermore, voyage duration is only 7.5 days from Broome.

This additional voyage duration is highly unlikely to result in any statistically significant differences in stocking density related animal welfare outcomes.

There lacks a real and tangible justification for excluding half of the Vietnam market from being considered a near market. The northern most boundary of a near market should be amended to south of latitude 22°N.

- *1.1.3 d)*

- Sheep and goats are not individually identified by electronic identification (RFID ear tags) outside of Victoria (sheep). On the assumption that the intention of this Standard is to maintain an animal's traceability, 'the animal's identification in accordance with state or territory legislation' is sufficient. This should also be reflected in 1.6.7, 1.7.5 & 1.7.6.

- *1.1.8*

- Management of sheep within registered establishments is mob-based, not pen-based. 'Pen-based' should therefore be removed from this Standard.

- *1.2.4*

- Training of exporters stock handlers, departmental staff and regional veterinary officers (RVO) is recommended to improve the consistency in the assessment of body conditions scoring.

- *1.2.5*

- The creation of compliance document templates would improve consistency in compliance. ALEC understands that the industry's Live Export Program (LEP) is undertaking a project to deliver such templates. This is also relevant for 1.4.5 & 1.7.5.

- 1.4.4
 - Training of exporters stock handlers, departmental staff and regional veterinary officers is recommended to improve the consistency in the assessment of body conditions scoring.
 - For consistency, the body condition score should align with the HSRA model.
- 1.4.8
 - Horn length is currently inconsistently assessed by RVO's. To avoid the inconsistent application of this Standard, exporters are opting to run cattle being exporter to Indonesia through a crush to accurately measure horn length. Cattle to Indonesia are not normally run through a crush prior to export, so to adhere to this Standard currently, cattle are exposed to increased animal welfare risk. The introduction of the "Rejection criteria guidebook" is a positive step forward, however, it is unlikely to be sufficient in and of itself. A focus through training, in conjunction with experienced stock persons, on the regulatory outcome sought by assessing RVO's is recommended, recognising that accurate horn length to the millimetre is overly and unnecessarily prescriptive.
- 2.1.4
 - This Standard should also include unloading in addition to loading.
- 3.1.15
 - DAWE commentary noting that 'these issues are complex, and this standard will be reviewed in a separate process to this update' is inadequate and unsatisfactory considering the substantial amount of information provided to DAWE by exporters. Awaiting the results of the Inspector General of Live Animal Export's review of sheep rejection processes is therefore also unnecessary.

Marking individual rejected sheep or goats requires in additional and unnecessary handling and does not align with national animal welfare standards of 'reasonable action' as it results in poorer animal welfare outcomes. Isolation and separation from the mob/consignment and recorded should suffice. 'Marked by semi-permanent or permanent method' should therefore be removed and replaced with 'identified and isolated as soon reasonably possible'.

ALEC strongly recommends that the Standard be removed from ASEL and replaced with a requirement for a sheep rejection management plan. Issues that may be identified will be then indicative of issues with the management plan, which can be amended accordingly.

- Cattle and buffalo have individual NLIS tags and therefore already have a 'permanent' method of recording rejected animals in place. Nothing further is necessary.
- 3.1.16
 - The definition of lamb is "an ovine animal that is under 12 months of age or does not have any permanent incisor teeth in wear". Therefore, the word 'immature' in 3.1.16i) is superfluous.
 - Whereas 'immature' bulls and steers behave similarly to entire and spayed female livestock (3.1.16ii)) when penned together, particular considering they must be of a similar weight ($\leq 50\text{kg}$). Therefore, steers and immature bulls should be allowed to be penned together as they do not present adverse welfare risks to each other. If during transport a bull starts to exhibit dominating behaviour, the offending animal should be promptly removed by the stock person.

- 3.4.2
 - There remains a lack of evidence that two clear days in registered establishments for short haul voyages delivers any animal welfare benefits. In fact, ALEC contends that increasing the clear day requirement in these circumstances beyond 24 hours only increases the risk of poorer animal welfare outcomes. This Standard as written prolongs the disruption experienced by cattle to be exported, increasing handling stress, without any defined benefit. Anecdotally, increasing the number of clear days and the associated disruption has resulted in an increase respiratory related mortalities post arrival in Indonesia.

The ASEL Technical Advisory Committee (TAC) made two points in their final report highlighted the lack of research done in this area:

'There appears to have been relatively little research done on the welfare benefits of providing cattle with more time in the registered premises.'

'Submissions on the issues paper proposed a range of changes to the holding periods for cattle in registered premises. The committee's considerations were unfortunately not assisted by recent or relevant research directed at this component of the cattle export process.'

Presumably, if adequate research has not been undertaken it is almost impossible to determine the absolute and relative importance of adjusting this Standard beyond the original 24 hours. If DAWE has research data that determines the absolute and relative importance of time spent in registered premises (in relation to the importance of other input mechanisms), then we request it be shared. Opinion in the absence of a solid fact base, expressed either by the TAC or certain exporters, should not be allowed to masquerade as scientific evidence.

Returning this Standard, being the minimum length of time that cattle must remain in a registered establishment prior to departure for the port, to 24 hours is strongly recommended.

- 3.7.1
 - The animal welfare risk trying to be addressed by this Standard is unclear. Whether the intent is to manage the risk of cold stress or shearing cuts, neither are issues in Western Australia, where the vast majority of sheep are exported from. ASEL shearing related Standards are outdated and don't align with risk or recent research. DAWE commentary that 'further work needs to be done to determine what change to this standard is appropriate to maintain the welfare of shorn animals in registered establishments' and 'changes to this standard will be considered in a separate review process' are inadequate and unsatisfactory considering the substantial amount of data provided to DAWE by exporters.

ALEC strongly recommends that the Standard be removed from ASEL and replaced with a requirement for a shearing management plan. Should this be unacceptable, an immediate review into sheep shearing standards is required. This also applies to 3.7.2 & 3.7.7.

- 3.7.4
 - This Standard is unnecessarily prescriptive and fails to deliver measurable animal welfare improvements. The Standard should focus on the desired outcomes, rather than prescribing to outdated industry practices. Current animal management practices means that shy feeders are not the prevalent issue for exporters when adapting sheep to ship ration.

To maintain consistency to state and national welfare standards and guidelines, ALEC recommends amending the Standard to 'at a rate ensuring adequate nutrition and adaptation to ship ration'.

- 3.7.9
 - Previous discretionary approval allowed extrapolation below 54kg, which is most common weights held in sheds. This Standard only allows decreased by 0.006m² for each 1kg decrease in individual liveweight below 40kg, rather than 54kg, which means more sheep held outside of sheds if a shipment is delayed.

ALEC strongly recommends amending this Standard to enabling extrapolation of 0.006m² for each 1kg above or below 54kg liveweight (to minimum of 38 kgs).

- 5.1.9
 - ALEC seeks confirmation on what and when constitutes an actual liveweight. Seeking to require exporters to weigh animals prior to loading is impractical, with fodder often loaded onboard vessels prior to livestock, and often not in the best interests of the livestock. There are ample regulatory tools available for DAWE to use should an exporter not load sufficient fodder. This then begs the question, what is the regulatory driver behind this Standard and what demonstrated evidence exists supporting its need?
 - If the 'actual' liveweight requirement remains, for cattle short haul fodder and bedding calculations these should be liveweights captured on entry to the registered establishment.

- 5.1.15
 - ALEC questions the extent of fodder required to be kept in reserve as a contingency and whether this substantial regulatory burden is justified. How often are contingency reserves required? This Standard results in excessive amounts of fodder being disposed of that is unused per voyage and acts as a disincentive for exporters to feed above the minimum ASEL requirement specified to avoid the potential of regulatory sanctions. ALEC contends that the substantial regulatory burden seeks to address a very low risk and should be amended accordingly.

- 5.2.5
 - This Standard requires future proofing by generalising the medicines to classes of medicine and doses per number of animals. Specifically referencing certain drugs is unnecessarily prescriptive. This also applies to 5.3.9.

- 5.6.6
 - The loading of vessels with livestock can take up to 3 days from the first animal loaded. Therefore, requiring a daily report on the first day is, as noted, onerous. It is also highly disruptive as it requires the Australian Government Accredited Veterinarian (AAV) or accredited stockperson to focus on reporting instead of the welfare of animals being loaded, potentially leading to poorer animal welfare outcomes. In addition to being onerous and disruptive, it is also duplicative as verification at port is already undertaken by RVO's.

ALEC notes that DAWE state making the necessary amendments is 'a large-scale change that would require changes to policy and current reporting, and will be considered in a separate review process.' ALEC recommends that this review process be initiated immediately.

- 6.1.14
 - This Standard is overly and unnecessarily complicated and the rationale and chart provided are difficult, if not impossible, to interpret. Considering only the top weight ranges risks a 5% decrease from minimum requirements, ALEC recommends removing the 5% clause for the sake of simplicity and replacing with n.5 rounding for lighter cattle (<420kg) and n.7 rounding for heavier cattle (>420kg).

- 6.1.24
 - ALEC notes that the implementation of this Standard has been delayed until further notice by DAWE, whether animals are 'accessible' during a flight or not, actions possible are restricted by IATA regulations on cargo handling during flight. On direct flights there lacks the ability for a stock handler, if present and with accessibility, to take any actions even when required. While there is the ability for access and intervention during layovers while transiting, ALEC questions the regulatory animal welfare outcomes sought by intending to impose this Standard in the future. Development of a suitable management plan may be a more efficient and effective regulatory option.

ALEC and its members expect that the above feedback will assist DAWE in effectively implementing appropriate ASEL Review outcomes. Please do not hesitate to contact me on 0400 980 452 or ceo@livexcouncil.com.au if you have any questions.

Regards,



Mark Harvey-Sutton
Chief Executive Officer
Australian Livestock Exporters' Council

