



June 2023

Australian Standards for Export of Livestock (ASEL) – Update 3.3

Reserve fodder requirements

Standard 5 relates to the loading onto vessels and onboard management of livestock for export by sea.

The proposed amendments to the standard/s appear below in tracked changes. Text proposed to be deleted will appear struck out.

General and all species requirements

5.1.15 To manage daily feed requirements when a voyage experiences a delay, ~~a minimum of 3 days of reserve feed must be carried on the vessel~~ an additional 20% or 2 days of reserve feed, whichever is greater, must be loaded on the vessel. The ~~reserve feed 3-day feed reserve~~ requirement is in addition to the calculated daily feed provisions for the ~~loading/unloading time and the recommended estimated~~ voyage length. Reserve feed must only be used if a delay is experienced during the voyage.

Rationale

The proposed changes to standard 5.1.15 aim to address the animal welfare risk arising from inadequate provision of reserve fodder in the event of voyage delay.

In undertaking our analysis for this paper and the near and far market definitions paper, Animal Welfare Branch (AWB) reviewed voyage length data from Tracking Animal Certification for Export (TRACE) and LIVEXCollect (LXC). We reviewed all cattle consignments departing Australia to all single destination ports and regions from 1 November 2020 to 31 December 2022, accounting for around 80% of all cattle exports. We compared estimated voyage length (EVL) submitted by exporters in their Notice of Intention (NOI) with actual voyage length (AVL) reported at voyage completion.

This analysis indicated that voyage length is:

- underestimated in 63% of cases
- correctly estimated in 26% of cases
- overestimated in 11% of cases.

When analysed by region, data indicated that voyage length underestimation occurred in exports to all regions.

On average, consignments are underestimated by approximately 1 day. This increases for longer voyages, for example, for consignments to China the average voyage length underestimation is 3.9 days.

To address the issue of voyage length underestimation and also to support the proposed amendments to standard 5.1.15 for reserve fodder, the department may consider introducing a minimum recommended voyage length (RVL) policy. The department has determined minimum RVLs for many routes using data

from TRACE and LXC. This data collates reported AVLs, port of loading, destination port, number of discharge ports and vessel class.

To address the animal welfare risk arising from inadequate provision of reserve fodder in the event of voyage delay three options are being presented for consideration.

Option 1: No change to current ASEL

Maintain the current ASEL requirement for voyages to carry 3 days of reserve fodder.

Analysis indicates there is widespread non-compliance with the reserve fodder requirement. For all cattle consignments, 54% had less than the 3-days of reserve fodder remaining on board (ROB) at voyage completion, increasing to almost 56% of cattle consignments on short-haul voyages. The incidence of zero fodder ROB is not uncommon across all regions, occurring in 8% of cattle consignments. AAV and accredited stockperson voyage reporting from these consignments did not indicate that there were negative animal welfare impacts from inadequate reserve fodder levels.

Non-compliance with the current ASEL standard may risk the health and welfare of livestock, by having inadequate reserve fodder in the event of a voyage delay.

However, a requirement to carry excessive reserve fodder potentially imposes an unreasonable financial and operational burden on exporters.

The department modelled fodder level outcomes under Option 1, using EVL submitted in NOIs and compared these to AVL reported at voyage completion. Based on loading and feeding at ASEL minimum levels, it was determined 9% of all cattle consignments to single port destinations would have had insufficient fodder to complete the voyage without rationing below the ASEL minimum level, even with the reserve fodder loaded. When the same voyages were modelled using a RVL instead of the EVL, the rate of consignments needing to ration fodder fell to 1%. This modelling also indicated the average amount of fodder ROB would have been 2.0 days.

This analysis indicates that Option 1 provides assurance that 99% of consignments have sufficient reserve fodder levels.

Option 2: Revert to the ASEL 2.3 requirement

An additional 20% or 3 days of reserve fodder, whichever is less, must be loaded on the vessel.

Analysis indicates widespread voyage length underestimation, occurring in 63% of cases.

By underestimating voyage length, fodder calculations based on a percentage of voyage length would also be underestimated. Therefore, reverting to ASEL 2.3 reserve fodder requirements risks the adequacy of fodder provisions if voyage length underestimation continues, with the potential for poor animal welfare outcomes.

The department modelled fodder level outcomes under Option 2, using the same methodology as used in Option 1. This indicated that 32% of all cattle consignments to single port destinations would have had insufficient fodder to complete the voyage without rationing below ASEL minimum levels, even with the reserve fodder loaded. When the same voyages were modelled using a RVL instead of the EVL, the rate of consignments needing to ration fodder fell to 7%. This modelling also indicated the average amount of fodder ROB would have been 0.7 days.

This analysis indicates that if the issue of voyage length underestimation is resolved, we may be able to consider Option 2.

Option 3: Proposed option: 20% or 2 days of reserve fodder, whichever is greater.

An additional 20% or 2 days of reserve fodder, whichever is greater, must be loaded on the vessel.

Under Option 3, the reserve fodder requirement for consignments less than 10 days would decrease from 3 days to 2 days. However, for voyages of 20 days or more, the reserve fodder levels would increase from current requirements.

The department modelled fodder level outcomes under Option 3, using the same methodology as used in Options 1 and 2. This indicated that 17% of all cattle consignments to single port destinations would have had insufficient fodder to complete the voyage without rationing below ASEL minimum levels, even with the reserve fodder loaded. When the same voyages were modelled using a RVL instead of the EVL, the rate of consignments needing to ration fodder fell to 3%. This modelling also indicated the average amount of fodder ROB would have been 1.2 days.

This analysis indicates that if the issue of voyage length underestimation is resolved, Option 3 provides for greater assurance than Option 2 that reserve fodder levels are sufficient.

More information

Learn more about [Australian Standards for Export of Livestock - Update 3.3](#)

Read more about [Exporting a livestock consignment](#)

Web agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/animal-welfare/asel-updates

Have Your Say haveyoursay.agriculture.gov.au/australian-standards-for-the-export-of-livestock-asel-2023-update

Email aselreview@agriculture.gov.au

Acknowledgement of Country

We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

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