

Australian Standards for Export of Livestock (ASEL) – Update 3.3: Submission by Sentient, The Veterinary Institute for Animal Ethics

Sentient is an independent Australian veterinary association dedicated to animal welfare advocacy based on the ethical implications of animal sentience and the findings of animal welfare science. Our members are represented in academia, private practice (companion, equine and large animals), non-government, government and industry settings, with expertise in many fields including animal welfare, animal behaviour, clinical medicine, zoo and wildlife medicine, epidemiology and the use of animals in teaching and research. A number are qualified specialists in particular disciplines or have extensive experience within industries such as live export, horse racing and greyhound racing. Sentient has presented at international and national conferences, published papers, contributed numerous submissions to state and federal government inquiries, and provided evidence at parliamentary public hearings. We also host final year veterinary science students for Public, Industry and Community placements in animal welfare advocacy. Sentient is registered with the Australian Charities and Not-for-profits Commission.

We appreciate the opportunity to provide commentary on the draft Australian Standards for the Export of Livestock (ASEL) – Update 3.3. Sentient is opposed to live animal export due to the inherent risks to animal welfare this industry entails. Whilst the trade continues, we are keen to assist by providing commentary that, if adopted, may help mitigate these risks.

When an accredited veterinarian (AAV) or stockperson must accompany a voyage

4.1.8 An accredited stockperson who is employed or contracted by the exporter must be appointed to accompany each consignment of livestock for the duration of the voyage. The accredited stockperson must not be a member of the vessel's crew.

Commentary: Sentient supports this amendment. It is crucial that AAVs and stockpersons be independent of the vessel's crew and that they remain on voyages for their full duration (based on the ASEL definition of 'voyage') to oversee animal welfare and provide full reports on mortality and morbidity of livestock.

4.1.9 Unless the exporter has approval under Standard 4.1.10, an AAV must accompany each consignment of livestock for the duration of the voyage in these circumstances:

- a) if the voyage is expected to be an extended long-haul voyage; and or
- b) on voyages with pregnant livestock; and or
- c) if the vessel is travelling to or through the Middle East; or
- d) if the vessel is new or has had a significant structural change or re-fit; or
- e) if the consignment is the first consignment for the exporter; or
- f) any other voyage when directed required by the department.

Commentary: Sentient does not support this limited list of circumstances upon which an AAV must accompany each consignment of livestock for the duration of the voyage. We submit that 4.1.9 be redrafted as follows:

‘An AAV must accompany each consignment of livestock for the duration of the voyage in all circumstances.’

One of the major animal welfare issues faced by livestock who are exported by sea is the lack of access to veterinary treatment throughout their voyage. The welfare risks to these animals are extreme from the time they are loaded, and it is an act of serious neglect to not at least ensure they are accompanied by personnel who are trained in animal health and welfare and can intervene to alleviate or end their suffering. The occurrence of illness or injury cannot be predicted or fully prevented due to the conditions of live export by sea, particularly given the unnatural, crowded and unsanitary conditions livestock are forced to endure. Only veterinarians with experience treating livestock can monitor, diagnose and treat these animals. Likewise, the veterinary role includes euthanasia, performing post-mortem examinations, detecting and developing plans to reduce the spread of infectious diseases (which may have zoonotic potential) and also raising the alert for food security risks. Without accurate reporting by AAVs of preventable and high mortality diseases such as pneumonia that may arise through poor preparation and inadequate vaccination programs, and without traceback to Australia, there is also a risk of animal health problems entering the receiving countries. The Department should be alert to the strong likelihood that exporters will object to the presence of AAVs or try to undermine their role, including by pressuring them to modify their reports. Such corrupt behaviour should be dealt with by loss of licence.

The definition of near and far markets

Table 10a Alternative minimum pen space allocation for consignments of cattle loaded at a port north of latitude 26°S where an exporter is approved to use the alternative pen space – ~~near~~ ~~markets~~ short-haul

Table 10b Alternative minimum pen space allocation for consignments of cattle loaded at a port north of latitude 26°S where an exporter is approved to use the alternative pen space – ~~far~~ ~~markets~~ long-haul

Commentary: Sentient agrees with the use of the terms ‘short-haul’ (less than 10 days) and ‘long-haul’ (10 days or longer) because geographical demarcation cannot accurately predict whether a voyage will be less than or longer than 10 days due to unexpected factors (such as weather and

tidal conditions, congestion at ports and vessel characteristics) that can lead to longer journeys and worse animal welfare outcomes. However, we advocate the same stocking densities for all animals, regardless of the duration of their voyage. Cattle who cannot comfortably turn around, lie down, move around or access food and water will experience very poor welfare, even in a 24-hour period; their needs do not change based on the duration of the voyage.

The requirement for contingency plans for escaped livestock – Sea

General and all species requirements

4.1.18 Contingency plans, including procedures for contacting the exporter, must be prepared in writing for each consignment that address:

- a) mechanical breakdown of the vessel or functionality relevant to maintaining the livestock's health and welfare; and
- b) feed and/or water shortage during the voyage; and
- c) the satisfactory tending, feeding and watering of the livestock in the event of a malfunction of the automatic feeding or watering systems, without compromising the safe navigation of the vessel; and
- d) an outbreak of a disease during the voyage; and
- e) adverse weather conditions during the voyage; and
- f) rejection of the consignment by the overseas country.; and
- g) procedures for the humane recapture of livestock that escape during the loading process.

Commentary: Sentient applauds the addition of point g) because livestock who escape during the loading process experience terror and risk serious injury, including after falling off wharves into the water, or being hit by boats or traffic. It is crucial that current practices and loading facilities are reviewed and that contingency plans are developed to reduce the risk of escape. We suggest that this point be amended as follows:

g) “procedures and provisions for the humane recapture of livestock that escape during the loading and unloading process”.

We are aware that many cattle escape at the ports of destination due to poorly designed unloading infrastructure, including truck gates that are prone to falling open or that can only be shut when the driver has moved forward from the ramp, which leaves gaps. Provisions required on live export ships to prevent this should include portable cattle panels with pins to allow crew members to isolate and recapture escaped cattle. This would also provide a safe space for cattle to recover safely from sedation. Other essential provisions should include tranquilliser guns on all ships (to be used by the AAV and head stockperson, who must all be accredited users) and portable ramps to help escaped animals back onto a ship or truck.

Penning requirements for horned cattle

Cattle sourcing and export criteria

1.4.8 Cattle with horns must only be sourced for export or exported if the solid non-vascular tip has been removed to a diameter of 3cm (or less if the horn vasculature does not allow) and horns have a blunt horn end; and

- a) horns are no longer than 12cm in length at the time of export, unless otherwise provided in a long-horned livestock management plan approved in writing by the department., or
- b) horns are longer than 12cm in length at the time of export and are pointing downwards parallel to the face and do not show signs consistent with the rejection criteria specified in Table 1.

Commentary: We submit that horns longer than 12cm should not be approved for loading and that point b) should be removed. Horns longer than 12cm in length, regardless of the direction they grow, are a danger to cattle both on land and especially during live export by sea. They can become caught in railings and troughs and common mortalities onboard arise from incidents of cattle having their heads trapped due to long horns. Another risk is the pain and suffering of cattle whose horns have become ripped off, exposing their skull. These injuries are horrific, can lead to infection and death and must be promptly treated. Sentient advocates the Government supports a shift towards the farming of non-polled cattle. De-horning by producers is often performed without pain relief, which causes pain and suffering and increases the risk of infection. The problem of cattle with lengthy horns needs to be addressed at the level of production. These animals should never be sent for export.

Cattle loading and management requirements

5.3.1 The minimum pen space allocations for cattle exported by sea are contained in Table 9, Table 10a, Table 10b, Table 11a, Table 11b, Table 12a and Table 12b. These penning criteria apply:

d) cattle without horns may be penned with cattle with:

- i) horns up to 12cm in length and where the horns are tipped (blunt) and / or
- ii) horns longer than 12cm in length and are pointing downwards parallel to the face and where the horns are tipped (blunt);

Commentary: Due to the animal health and welfare risks outlined in our previous point about cattle sourcing and export criteria, and also on the grounds of safe animal handling, we urge that point d) ii) be removed. Cattle with parallel horns should not be allowed for export. Furthermore, it is concerning that no maximum horn length has been specified but we submit that no animal with horns longer than 12cm in length should meet the criteria for export.

Table 1 Rejection criteria for all species by sea: Head

- Sharp horns
- Horns that would cause damage to the head or eyes of the animal or other animals
- Horns that would restrict access to feed or water
- Horns that would endanger the animal or other animals
- Bleeding or not fully healed horn stumps or broken antlers
- Horns longer than appropriate for export.

Commentary: Sentient supports the first five horn rejection criteria but the final point, ‘horns longer than appropriate for export’ has not been clearly defined for cattle, so we recommend replacing it with: ‘horns longer than 12cm in length.’

Penning requirements for horned sheep

Sheep sourcing and export criteria

1.7.7 Sheep with horns must only be sourced for export or exported if the horns:

- a) would not cause damage to the head or eyes of the animal or other animals during the export process; and
- b) would not endanger the animal or other animals during the export process; and
- c) would not restrict access to feed or water during the export process; and
- d) are no more than 1 full curl, unless otherwise provided for in a long-horned livestock management plan approved in writing by the department and do not show signs consistent with the rejection criteria specified in Table 1.

Commentary: We support the changes to points a), b) and c) but recommend that point d) be changed as follows: ‘are no more than ½ full curl ...’. Sheep with even half a curl are notorious for becoming stuck in troughs and railings at sea, requiring crew members to unhook them, which is an occupational health and safety hazard. Also, having horn curls is a welfare risk for sheep, who can become hooked around railings outside pens or on external railings, or hooked into the end of fodder delivery pipes, which leads to fodder smothering their noses under pellets and pellet dust. It can be difficult to detect sheep who are trapped in these ways by their horn curls, and unless they are freed, they are highly likely to experience exhaustion, collapse and death from strangulation or suffocation. As for long cattle horns, the real solution to this animal welfare and occupational health and safety issue is for farmers to prepare their animals properly before sending them to export, where they are destined to be exposed to intensive penning.

Sheep loading and management requirements

5.5.1 The minimum pen space allocation for sheep is contained in Table 19. These penning criteria also apply:

- a) where a curfew of more than 12 hours will be undertaken at the registered establishment prior to transport to the port of embarkation, a curfew factor of an additional 5% must be applied when calculating liveweight (cumulative with other additional space requirements and must be calculated first); and
- b) for weights between those shown in Table 19 the minimum pen area per head must be calculated by linear interpolation; and
- c) [deleted]
- d) sheep without horns may be mixed with sheep with horns up to 1 full curl in length; and
- e) sheep exported in accordance with a long-horned livestock management plan approved in writing by the department under Standard 1.7.7 d) must be allocated an additional 10% space.

Commentary: Regarding point d), we submit that horned sheep (regardless of horn length) and polled sheep should not be mixed as this increases the risk of injury to polled sheep. Regarding point e), whilst an additional 10% space may reduce risk of injury from long horns, this would require low stock numbers in pens where sheep can be easily monitored so this needs to be specified.

Table 1 Rejection criteria for all species by sea

Head:

- Sharp horns
- Horns that would cause damage to the head or eyes of the animal or other animals
- Horns that would restrict access to feed or water
- Horns that would endanger the animal or other animals
- Bleeding or not fully healed horn stumps or broken antlers
- Horns longer than appropriate for export.

Commentary: We support this list of rejection criteria but the final point: ‘horns longer than appropriate for export’ has not been clearly defined for sheep, so we recommend replacing it with ‘more than half a horn curl.’

Clarifying livestock identification requirements in laboratory test reports – Sea

General and all species requirements

1.1.3 Livestock sourced for export must be:

- a) identified in accordance with state and territory and National Livestock Identification System (NLIS) requirements; and
- b) traceable to the property of source; and

- c) accompanied by a correctly completed and signed movement records such as NVDs/waybills; and
- d) individually identified where testing, including pregnancy testing, is required during preparation, excluding feeder/slaughter sheep and goats where the pregnancy testing certification may identify animals to a mob-based level; and
- e) accompanied by any test results, including all pregnancy testing and spay declarations where applicable. Laboratory test reports must include the below information in a single document:
- i) the NLIS identification number of the animal where individual identification is required by state or territory legislation,
 - ii) the PIC where the animal was sampled, and
 - iii) the visual tag number of the animal (if applied).

Commentary: Supported.

Rejection criteria table – Sea

General and all species requirements

Table 1 Rejection criteria for all species by sea Category Rejection criteria General requirements •

Category	Rejection criteria
General requirements	Failure to meet importing country requirements including sex or breed if specified • Pregnancy status not confirmed as appropriate for export • Lactating animals/lactating animals with young at foot • Viral diseases such as scabby mouth or infectious bovine rhinotracheitis • Animals displaying clinical signs of infectious or contagious disease or external parasites • Animals showing signs of injury such as but not limited to fractures or swelling
Systemic conditions	Body condition score not appropriate for export (such as emaciated or over-fat) • Anorexia (inappetence or 'shy feeders') • Uncoordinated, collapsed, weak • Unwell, lethargic, dehydrated • Ill-thrift
Gastrointestinal system	Dysentery or profuse diarrhoea • Bloat Musculoskeletal system
Musculoskeletal system	Abnormal gait or lameness of any kind • Abnormal soft tissue or bony swellings
Nervous system	Nervous symptoms such as head tilt, circling, incoordination • Abnormal or aggressive behaviour/intractable or violent
External/skin	Sheep wool or hair longer than 25mm • Generalised papillomatosis or generalised ringworm or dermatophilosis • Generalised and extensive buffalo fly lesions • Generalised skin disease or infection • External skin cancer • Lacerations that penetrate the full thickness of the dermis or are

	likely to affect the health or welfare of the animal • Discharging wounds or abscesses • Cutaneous myiasis (flystrike) • Balanitis (pizzle rot in sheep) • Blood/abnormal discharge from reproductive tract (vulva/prepuce) • Visible external parasites
Head	Blindness in 1 or both eyes • Cancer eye • Keratoconjunctivitis (pink eye) • Excessive salivation • Nasal discharge consistent with signs of a contagious or infectious disease • Coughing consistent with signs of a contagious or infectious disease • Respiratory distress or difficulty breathing • Sharp horns • Horns that would cause damage to the head or eyes of the animal or other animals • Horns that would endanger the animal or other animals • Horns that would restrict access to feed or water • Bleeding and/or not fully healed horn stumps or broken antlers • Horns longer than appropriate for export • Scabby mouth
Other	Groups of animals with unusual mortalities • Disparities in sex, size, weight or age that could cause an issue with the health or welfare of the animals (redraft animals in this case)

Commentary: Supported, but we recommend that under ‘Head’, ‘horns longer than appropriate for export’ should be specifically defined for cattle as ‘horns longer than 12cm in length’ and for sheep as ‘more than half a horn curl.’

Reserve fodder requirements

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.

Commentary: Sentient supports this change to address the risk arising from inadequate provision of reserve fodder in the event of voyage delay, which often occurs, but we recommend a further revision to include “an additional 30% or 2 days of reserve feed” rather than an additional 20%. The rationale for this is that exporters often underpredict voyage length, which can lead to under loading of fodder, so having maximum reserves is essential to prevent starvation and mortality of livestock.

Livestock marking and isolation practices in Registered Establishments

General and all species requirements

3.1.15 Livestock must be individually inspected at unloading, and inspected at least daily, to determine whether they are suitable for preparation for export. Any animal must be rejected from the consignment if they:

- a) are, identified as being distressed, or injured, or
- b) have a condition that could be defined as an infectious or contagious disease, or
- c) have a condition where the animal's health or welfare could decline, or
- d) could suffer distress during the export process, or are otherwise unsuitable for export (including the rejection criteria outlined in Standard 1 Table 1), or
- e) do not meet importing country requirements.

All rejected animals must be individually visually marked upon identification, by a semi-permanent or permanent method.

Where a rejected animal is injured or suffering distress, the animal must be isolated from the consignment upon identification.

Where a rejected animal has an infectious or contagious disease, the animal must be isolated from the consignment upon identification where possible or otherwise at the first reasonable opportunity.

Where an animal is not suffering distress or does not have an infectious or contagious disease, the animal should be isolated upon identification or at the first reasonable opportunity.

All rejected animals must be removed from the consignment prior to being loaded for departure from the registered establishment to the port.

Arrangements must be made for the prompt and humane handling, treatment and care of rejected livestock, including:

- e) provision of treatment to all sick or injured livestock;
- f) provision of veterinary advice if the cause of a sickness or injury is not obvious, or if action taken to prevent or treat the problem is ineffective; and
- g) where required euthanasia and/or disposal, in compliance with all relevant and applicable legislation.

Commentary: Supported.

Add to definitions:

'At the first reasonable opportunity' means within the timeframe that would be expected by a reasonable person with the relevant knowledge, skills and experience in the management of livestock given the urgency of the situation in relation to the welfare of the livestock.

Commentary: Supported, but we suggest the inclusion of a maximum timeframe, such as 'no longer than 12 hours' and an assurance that livestock are monitored on a 24-hour basis. For example, an animal who has become stuck, has a broken leg or is experiencing breathing difficulty

should be tended to as soon as possible and certainly not beyond 12 hours. All of this reinforces the need for AAVs to be present for the full duration of all voyages.

The number of clear days livestock spend in a Registered Establishment

Sheep management requirements

3.7.7 The minimum length of time that sheep must remain in a registered establishment prior to departure for the port is 5 clear days. For any day on which animals are subject to a feed or water curfew of greater than 12 hours an additional clear day is required. During at least the last 3 clear days prior to export, sheep are to be fed ad libitum on a ration equivalent in both form and composition to that which is to be used on the export voyage.

3.7.1 Sheep that are 10 days or more off shears may be accommodated in paddocks at the registered establishment.

3.7.2 Sheep that are less than 10 days off shears must be:

- a) given at least 2 clear days between shearing and loading for export, and
- b) accommodated in sheds at the registered establishment, unless otherwise provided in an accommodation of shorn sheep management plan approved in writing by the department.

Buffalo management requirements

3.2.2 The minimum length of time that buffalo must remain in a registered establishment prior to departure for the port is 5 clear days. For any day on which animals are subject to a feed or water curfew, an additional clear day is required.

Cattle management requirements

3.4.2 The minimum length of time that cattle must remain in a registered establishment prior to departure for the port is 2 clear days for short or long-haul voyages, or 3 clear days for extended long-haul voyages. For any day on which animals are subject to a feed or water curfew, an additional clear day is required.

Goat management requirements

3.6.4 The minimum length of time that goats must remain in a registered establishment prior to departure for the port is 5 clear days. For any day on which animals are subject to a feed or water curfew, an additional clear day is required. During at least the 3 clear days prior to export, goats are to be fed ad libitum on a ration equivalent in both form and composition to that which is to be used on the voyage.

Commentary: Supported.

Record keeping requirements for Registered Establishments

Monitoring and reporting requirements

3.8.1 - Animal records must be kept by the registered establishment occupier in accordance with the registered establishment operations manual, from the time of unloading of livestock at the registered establishment to their loading for transport to the port of embarkation and retained for at least 2 years after the date of export. These must include:

- a) the animal's identification in accordance with state and territory and NLIS requirements; and
- b) all management procedures that occur in the registered establishment relevant to export preparation and date(s) undertaken; and
- c) all veterinary medicines and treatments provided by the registered establishment to livestock undergoing export preparation (including species, treatment date(s), trade name or active ingredient, batch number and if used according to manufacturer's directions. If not used according to manufacturer's directions, the dose administered is to be included); and
- d) daily inspections by competent stock handlers of livestock health, welfare and appropriateness for export; and
- e) any mortality, sickness, injury or other sign consistent with the rejection criteria found, and actions taken to identify and remove any rejected livestock from the consignment, including location of rejected livestock, handling, care, treatment, euthanasia and/or disposal; and
- f) all other information required to demonstrate compliance with the relevant ASEL standards.

Commentary: Supported, with the recommendation that a simplified report of any health issues and mortalities and their causes observed in the Registered Establishment be provided to the shipboard AAV and Head Stockperson in a handover meeting to assist with their monitoring of livestock. This will be particularly crucial for the detection of infectious diseases, as animals may be asymptomatic at the time of loading.

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