



AUSTRALIAN LIVESTOCK  
EXPORTERS COUNCIL

3 December 2021

Carol Sheridan  
Assistant Secretary – Animal Welfare  
Department of Agriculture, Water and the Environment  
Canberra ACT 2601

By email: [animal.welfare@agriculture.com.au](mailto:animal.welfare@agriculture.com.au)

Dear Carol

**Re: Draft report - Heat and cold stress in *Bos taurus* cattle from southern Australia during long haul export by sea**

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. ALEC therefore appreciates the opportunity to provide comment on the *Draft report: Heat and cold stress in Bos taurus cattle from southern Australia during long haul export by sea* (the Report), released for consultation by the Department of Agriculture, Water and the Environment (DAWE).

The research and analysis undertaken in the Report is clearly superior to past report produced by DAWE on cattle and sheep heat stress risks. Basing the findings and recommendations in the Report on analysis of actual voyages, rather than experimental research that does not completely, or even largely, replicate conditions onboard live export vessels, is commended. This contrasts markedly to the heat stress review process used for sheep exports to the Middle East. However, the livestock export industry remains concerned with the purpose and projects being undertaken by the Animal Welfare Branch (AWB). Scientific and statistical assessment should be undertaken by entities that have the requisite skills and experience, namely research and development corporations (RDC) such as LiveCorp.

RDC's, such as LiveCorp, also make more efficient and effective use of exporter levies. Scientific and statistical assessment undertaken by the AWB are cost recovered through export related fees and charges. This is over and above the statutory levy paid by exporters to LiveCorp, which has the substantial added benefit of attracting matched funding from government. It is essential that regulatory decisions are practical and guided by robust research and evidence undertaken and analysed by recognised RDCs. This is extremely pertinent now as the global economy battles the impact of COVID-19, and even more so for our trading partners where these regulatory decisions have a real and tangible impact on their food security.

Another drawback with AWB reviews is that more regulatory burden inevitably follows. The Report continues this unwavering trend with 18 recommendations, despite the major identified risks being confined to Bos taurus slaughter cattle shipped during the late autumn and winter months and that these risks are either addressed by existing regulatory tools, or tools that are in development. DAWE's regulatory mindset needs to change. Commentary, finding and recommendations throughout the Report posit an assumed concern due to the lack of demonstrated evidence, rather than accepting there is no evidence of a risk. This is indicative of a mindset that prefers to find a problem, rather than being satisfied when a demonstrated risk is not present. Cold stress and data recording related findings and recommendations within the Report are a case in point.

This was also identified by the Technical Expert Group (TEG) in comments contained in Appendix D of the Report. The TEG recommended 'increased justification and explanation for some recommendations, stating in some cases it was not clear how recommendations were developed out of the findings.' ALEC strongly supports this assertion as the Report does not differentiate between unsupported observations and scientific evidence.

The Report also references submissions received during the earlier iteration of the Bos taurus review, attempting to qualify a point or to provide some justification. However, the reference does not impart the reader with any perception of the submission's scientific integrity. For example, was the submission making an unqualified observation or was it factual, supported by scientific evidence?

#### **Alignment with industry**

The Australian Livestock Export Corporation (LiveCorp), the Australian livestock export industry's service provider and research body, has substantial technical expertise in export processes and the associated regulatory framework. ALEC notes that the Report predominately aligns with the LiveCorp preliminary report submitted to DAWE in May this year, which concluded:

- Cold stress is not a significant welfare issue for voyages within the scope of the Review.
- Similarly, heat stress is not a significant welfare issue for within scope voyages, except for slaughter Bos taurus cattle voyages to China, leaving southern Australia in the late autumn or winter.
- Breeder Bos taurus cattle voyages to China have an excellent welfare record.

The Report therefore also predominately aligns with ALEC's policy on temperature stress risk in long haul Bos taurus voyages by sea:

*In recognition of the increased risk heat stress poses on heavy slaughter Bos taurus cattle voyages to China leaving southern Australia by sea in the late autumn or winter, ALEC supports DAWE exercising rigorous regulatory scrutiny, reflective of the increased risk, on any heavy cattle management plans submitted for proposed export consignments to China that exhibit the following characteristics:*

- heavy Bos taurus cattle (average weight > 500kgs),
- grainfed,
- departures from southern ports from May to August.

#### **Heat stress**

ALEC commends the Report recommendation that a suitable Heat Stress Risk Assessment (HSRA) should be employed all year round for Bos taurus slaughter cattle to all destinations, recognising that slaughter cattle are at a higher risk of increased heat load than other Bos taurus cattle types and at a higher risk of heat-related mortalities compared to Bos taurus breeders.

This is a significant improvement on the Australian Standards for the Export of Livestock (ASEL) Technical Advisory Committee (TAC) recommendation that Bos taurus cattle sourced from southern

Australia be prevented from being exported on voyages crossing the equator between 1 May to 31 October (inclusive), unless an agreed livestock HSRA indicates the risk is manageable. ALEC strongly supports the Report's recommendation superseding the TAC recommendation, noting that the TAC recommendation lacked supporting evidence and would have placed a substantial and unwarranted regulatory impost on the industry.

### **Comparison with domestic production systems**

The Report states that there is evidence of increased heat load during long-haul Bos taurus voyages from southern Australia in all classes of cattle (breeder, feeder or slaughter):

- to all destinations
- from all departure ports and
- departing during both the northern hemisphere winter and summer.

What the Report fails to consider is how the increased heat load the cattle are purported to be subject to compares with domestic production systems. Once again it appears the livestock export industry is judged and therefore regulated to a different and much higher standard. ALEC therefore strongly recommends DAWE undertake a valid comparative risk assessment before assuming identified heat load constitutes a need for additional regulatory burden on one portion of the red meat sector.

### **Delineation of slaughter cattle**

While the above recommendation is a substantial improvement on the TAC recommendation, apportioning all increased heat related risk to all slaughter cattle, without delineation, indicates that further in-depth analysis is required to ensure regulatory settings are not unnecessarily burdensome. LiveCorp analysis, mentioned earlier in this submission, identified that heavy slaughter cattle posed an increased risk heat stress on voyages to China leaving southern Australia by sea in the late autumn or winter, not all slaughter cattle to all destinations.

LiveCorp analysis of voyages carrying Bos taurus with notifiable mortality events identified that it was the heavy (>500kg), grain fed (>100 days on high performance grain ration) slaughter cattle that posed the increased risk on voyages crossing the equator between 1 May to 31 October.

Considering ASEL prohibits the export of cattle over 500kg from being shipped unless a heavy cattle plan is agreed between the exporter and DAWE, the associated risk this class of animal poses can be appropriately considered and managed through this mechanism.

### **Additional pen space**

ASEL v3, implemented on 1 November 2020, increased pen space allowances particularly for lighter cattle (by more than 20% for some cattle). These changes have and will continue to alter welfare outcomes for live export voyages generally.

ALEC first questioned the relevance of reviewing welfare outcomes under ASEL v2.3 when the Review was initially discussed in August last year, considering ASEL v3 was to be implemented soon thereafter (1 November 2020). ALEC contended that it would be prudent to holdoff undertaking a review until the impact of ASEL v3 changes could be assessed. This argument is still relevant as this concern was also raised by the TEG commenting in the Report that the 'timing and nature of the introduction of ASEL 3 made it difficult to determine how many factors may change or improve through ASEL 3 alone.'

ALEC therefore maintains and strongly recommends that any further consideration of providing Bos taurus slaughter cattle exported from southern Australian ports during the northern hemisphere summer additional pen space until substantial data on ASEL v3 shipments become available and a regulatory impact statement process is undertaken.

## **Vaccinations**

The Report recommends that consideration be given to Bovine Respiratory Disease (BRD) vaccinations for *Bos taurus* slaughter cattle departing Australia from southern ports between 1 May - 31 October. ALEC appreciates the importance of vaccinating for diseases cattle may be exposed to, particularly during domestic transport, time at the registered establishment and during voyages, and therefore accepts this recommendation in-principle.

ALEC is open to developing industry policy and working with LiveCorp on projects on BRD vaccination programs, noting that a BRD vaccination framework already exists as it is included within the heavy cattle management plan. Further associated recommendations should therefore be delayed until the effectiveness of this activity is known and understood.

## **Hotspots**

Independent Observer (IO) reports provide documented evidence that onboard export staff actively manage hotspots during voyages. While data loggers 'could assist' in improving the accuracy and recording of diurnal ranges of deck temperatures, it would not be without a substantial increase in export staff time and effort, placing, retrieving and submitting data. Therefore, without considerably more demonstrated evidence supporting the need, the additional and substantial regulatory impost is unnecessary and strongly opposed.

## **Pad management**

Pads are managed according to the environmental conditions being experienced. This therefore makes regulating their management very difficult and unwarranted. ALEC notes that there are best-practice activities that are undertaken by most exporters. To ensure a better understanding of these practices and their importance, and therefore uptake, industry is committed to develop best-practice guidance for exporters, in collaboration with LiveCorp.

## **Additional comments**

- Overview by destination region (pg. 15)
  - Table 6 commentary appears to be factually incorrect. Supply and price were not the driver behind lower export numbers in 2016-17.
- Premature lactation (pg. 62)
  - The issue of premature lactation is separate and unrelated to heat or cold stress and is therefore out of scope for this review and should be removed.
  - Reference to one submission stating that 'it is likely to be associated with feeding management and thermal conditions during transport' – appears to be speculation without documented scientific evidence and should either be removed or qualified.
- 5.5.1 Summary of reporting of heat stress
  - An alternate view would be that heat stress was not a major issue. Another example of the Report continuing to seek justification for a heat stress issue even in the face of limited evidence.
- 6. Cold stress
  - The analysis and findings do not justify the cold stress related recommendations made in the Report. Further evidence of a mindset that prefers to find a problem, rather than being satisfied when a demonstrated risk is not present.

## **Conclusion**

ALEC and our members appreciate the opportunity to provide comment on the *Draft report: Heat and cold stress in Bos taurus cattle from southern Australia during long haul export by sea*. The research and analysis undertaken in the Report is clearly superior to past report produced by DAWE on cattle

and sheep heat stress risks. However, future similar analysis should be undertaken by LiveCorp for a more competent and cost-efficient approach.

ALEC strongly supports the clarification that breeder and feeder cattle are lower risk and rightfully do not feature in any recommendations seeking to deliver additional regulatory burden. However, the analysis of slaughter cattle doesn't support or justify the raft of proposed recommendations. Particularly considering there is existing regulation to manage or mitigate the identified risks. Slaughter cattle related recommendations should also be more specific to delineate the higher risk portion of the class.

ALEC expects that this submission will assist DAWE in establishing sensible, science and risk-based regulatory oversight of long-haul Bos taurus exports by sea.

Please do not hesitate to contact me at [ceo@livexcouncil.com.au](mailto:ceo@livexcouncil.com.au) or on 0400 980 452 should you wish to discuss further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Harvey-Sutton', with a stylized flourish at the end.

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

