

9 January 2019

8 January 2019

Technical Advisory Group Secretariat
GPO Box 858
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By email: tacsecretariat@agriculture.gov.au

Dear Secretariat

Re: Australian Standard for the Export of Livestock (ASEL) Draft Report

Please accept this as a supplementary submission to our submission of November 2018. Since our initial response to the draft ASEL Review, the draft Heat Stress Risk Assessment for the Export of Live Sheep Review (HSRA Review) was released on 13 December 2018.

We have written to the Minister Littleproud in response to the draft HSRA Review report stating that if the recommendations of that report were adopted it will result in the end of the live sheep export trade with severe contagion to cattle. This is because the draft HSRA Review report has not only substantially lowered the threshold but also the risk setting. The end result is a threshold / risk setting that is impossible to meet.

The Panel seems to have ignored evidence, including from AAV reports, and those from Independent Observers, that for a large part of the year sheep on voyages to the Middle East suffer no overwhelming serious discomfort at environmental wet bulb temperatures above 28 degrees.

Of equal concern is that new animal welfare benchmarks in the report, which are unprecedented globally in terms of their requirements, will have implications over time for domestic sheep production practices and management of both heat stress and cold stress – standards cannot be introduced in one section of the supply chain without implications for all sections when root causes are the same.

Whilst, the draft HSRA Review report confines itself in scope to the live sheep trade, it potentially sets a concerning precedent for the calculation of Heat Stress Risk Assessments in other species and in other areas of animal production. Of particular concern to ALEC are the ASEL Draft Recommendations 23 and 24. Taken together these recommendations propose to apply the findings of the HSRA review, which are limited to live sheep exports to the Middle East, more widely to other livestock and other destinations involving livestock crossing the equator without the requisite analysis and research being undertaken.

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Should a heat stress risk assessment as proposed by the draft HSRA review be applied to cattle, then the viability of the live cattle will also be at risk.

We are committed to welfare-based standards and have spent significant resources and time developing them. They are not yet finalized but are close to finalisation. There is no current evidence that indicates how these standards can best be measured.

Heat stress risk assessment is a complex and specialised area. Recommendations to extend the HSRA model to other species and voyages should not be made without significant specialised input and the requisite research being undertaken. We, therefore, request that Recommendations 23 in the draft report be removed from the final report and Recommendation 24 either be removed, or made specific to sheep.

Given the urgency in the context of the HSRA review we are providing this brief submission. We would of course be very happy to speak to the committee in further detail.

Yours Sincerely



Hon Simon Crean
Chairman
Australian Livestock Exporters' Council