



Attachment: Cattle Council Submission

Cattle Council's response below follows the sequence of questions put by the TAC in its Issues Paper; page numbers in parentheses are in reference to the Issues Paper. Following the table are comments on issues not otherwise covered.

SECTION 3 – REPORTING AND INVESTIGATIONS (p. 11)	
General Comment	
<p>In spite of all good intentions, mortalities are inevitable in any livestock population. The challenge is to reduce, to as close to zero as possible, unusual mortalities caused specifically by particular forms of management, including transport.</p> <p>The current 'reportable mortality rate' (RMR) is a tool to encourage minimising of mortalities during voyages and to trigger action if it is exceeded. Its application is binomial: one rate is set for voyage of ≤ 10 days and another for voyages of > 10 days.</p> <p>Cattle Council suggests the RMR be applied in a different way such that it be based on daily increments. Once calculated, the per-day rate can be multiplied by the number of days for each voyage, including delays. The resulting RMR would apply for the whole voyage, as it does now.</p> <p>Apart from allowing for a more accurate RMR that is proportionate to the length of journey, an advantage of this approach is that an RMR could also be applied to a part of each voyage if desired, and used to signal the need for corrective action if there is a spike in mortalities over a short part of a longer journey.</p> <p>Either way, Cattle Council continues to support the utilisation of an RMR.</p>	
Specific Responses against TAC's questions	
<i>Questions about reportable mortality rate (p. 13)</i>	
1.	Cattle Council recommends revision of the methodology for the RMR be considered along the lines described above.
2.	The current RMRs are set above actual mortality averages for voyages involving cattle, which is appropriate. Notwithstanding the comments above on the <i>methodology</i> for applying the RMR to each voyage, Cattle Council supports the RMRs being based on current levels as they do act as incentives for good animal-welfare practice.
3.	Historical mortality rates can be used to 'inform' the setting of the RMR, which should be reviewed annually.
4.	<p>The RMR should be used as a tool to encourage sound animal-health and -welfare practices and, as a consequence, the minimisation of mortalities.</p> <p>To make this more effective, RMRs could be applied to other than just whole voyages where end-of-voyage reporting is assessed for potential action: they could also be calculated for time increments within voyages where, if reached, on-board corrective actions can be triggered to assist in militating against the risk of a full-voyage crisis.</p>
5.	<p>Different RMRs could be applied to different classes of livestock. Using the figures supplied in the Issues Paper as examples, cattle and buffalo clearly have different historical mortality rates; provided these figures are scientifically supported, it may be prudent to apply different RMRs to the two species. The same logic would apply within species (e.g., vulnerable bulls versus heifers).</p> <p>Regarding different zones within the vessel and assuming the same type of livestock throughout, the one RMR should be applied to each zone, but each zone should be monitored separately. A low upper-deck mortality figure, for example, should not be used to 'mask' a high lower-deck figure.</p> <p>The 'length of journey' issue is covered earlier by referencing daily increments and extrapolating these over the journey's total length, including any unforeseen extension to a</p>



	voyage.
6.	'Mortalities' are a crude proxy for measuring welfare, so Cattle Council supports the principle of augmenting the RMR with other measures where possible. Identifying and validating such measures, particularly when behavioural indicators are involved, have proved difficult issues for the livestock industry, but such measures are becoming available. Having said this, these measures should be used judiciously and as 'alerts' or early warnings for livestock handlers rather than as the basis for punitive actions, at least until a better understanding of their impact is gained.
<i>Questions about voyage reporting (p. 16)</i>	
1.	<p>Cattle Council notes the research project cited by LiveCorp (W.LIV.3032) and will hold most comments until the results are available.</p> <p>For noting:</p> <ul style="list-style-type: none"> • <i>maximum</i> and <i>minimum</i>, not average, daily temperatures and relative humidities should be recorded and reported; • A mechanism for case-by-case projections of risk could be considered, which would allow exporters to adjust their mitigation strategies as required for each proposed voyage; • behavioural indicators in livestock should be recorded and reported daily (reference LIVEXcollect app); • mortalities by deck, hold, tier and/or zone for each species should continue to be recorded and reported daily; • reporting mechanism by AMSA around ventilation and air turnover and velocity should be reviewed; and • Cattle Council supports an on-board video log being recorded for a prescribed period each day on all live export shipments. <p>To expand on McCarthy's observation, all effort should be made to limit imposing additional administrative burden on livestock-management personnel involved in reporting. While thorough reporting is seen as essential, electronic means for collecting data should be used wherever possible.</p>
2.	More information on the impacts would need to be sought before the McCarthy recommendation as implemented by the Department is applied more broadly. Cattle Council reserves its right to provide additional comments if more details become available.
3.	<p>Cattle Council supports a factual public-reporting process as part of transparency and building trust. Reports should be written in a way useful for producers and the community alike.</p> <p>Cattle Council supports the TAC seeking expert advice on how best to approach this.</p>
4.	<p>Cattle Council supports monitoring systems calibrated to the AMSA standards, which would include max/min temperatures and relative humidity, wind velocity and ventilation, water supply and factors impacting animal stress.</p> <p>The presence of stock handlers should be recognised as a form of real-time monitoring.</p>
5.	<p>One additional environmental parameter of importance is 'air velocity at head level'. For some types of livestock, there is strong evidence that high air velocity (not just ventilation) is a critical factor for survival in the event of high temperature and high relative humidity.</p> <p>Reportable trigger levels if implemented should be for the purpose of corrective, not necessarily punitive, actions.</p>
6.	Cattle Council supports the recording and reporting of animal-welfare indicators provided they align with applicable standards and guidelines and are for the purpose of identifying



	and/or 'alerting' of impending incidents. Any reporting must assist to mitigate risks.
7.	Additional recording and reporting requirements, if deemed fit for purpose and efficiently applied, should be considered a cost of doing business. The supply/demand balance will influence whether the cost is passed up or down the supply chain or is carried by the importer and/or exporter. This said, it is commonly accepted the producer supplying the cattle most commonly wears the additional cost and, as such, should have a say in the benefits and costs associated with the change being proposed.
SECTION 4 – HEAT STRESS RISK ASSESSMENT (p. 17)	
General Comment The Heat Stress Risk Assessment (HSRA) model is central to the livestock-export debate; however, Cattle Council acknowledges, “the HSRA model and its settings are not considered as part of this Issues Paper” (Issue Paper, p. 17), awaiting results from the Technical Reference Panel (TRP) established by the Department to examine them. Cattle Council looks forward to being kept informed of progress with the TRP and involved in discussions following its reporting.	
Specific Responses against TAC’s questions	
<i>Questions about limits relating to heat stress risk assessment application (p. 18)</i>	
1.	Notwithstanding the comments made under #2&3 below about ‘disparity data’, paragraph 3A.4 (a) (ii) should be amended to cover <i>all</i> shipments. If the temperature differences are minor then so be it, but this should not preclude the HSRA model being applied. The point here is that the primary focus of applying the model should be on <i>potentially abrupt changes to climatic conditions</i> rather than on any specific market, even though the latter may seem the result. (It is noted that <i>Bos taurus</i> and <i>Bos indicus</i> cattle handle climatic conditions differently, which should be factored in when assessing the HSRA. Account should also be made of situations where <i>Bos taurus</i> cattle have in some way been pre-conditioned for the voyage and the climate into which they are being sent.) Applying the model to all shipments, albeit with some of them falling well inside the model’s parameters, should not be onerous and would send a strong message to observers that everything is being done to ensure the safety of the animals on board the shipments.
2.	For assessing voyagers destined for climatically risky markets, an alternative approach to using ‘dates of departure’ would be to assess each potential voyage on <i>disparity data</i> ; that is, by recognising that climatic extremes don’t always align with calendars, it may be more prudent to use weather-forecasting technology to estimate the two extremes (and not ‘averages’) of ‘temperature’ and ‘relative humidity’ likely to be experienced throughout the voyage and adjust load parameters accordingly before the livestock embark. While this approach might appear more onerous, it places the focus on the higher purpose of the HSRA model and various animal-welfare parameters: to minimise potential stress to the livestock and management-personnel on board.
3.	
SECTION 5 – SOURCING AND PREPARATION OF ANIMALS (p. 19)	
General Comment Cattle Council is pleased the Body Condition Score (BCS) chart on p. 62 of the Issues Paper has been chosen as reference for cattle, as against the outdated version in the ASEL and ASEL Reformatted versions. This new chart, which was developed under MLA’s project B.AWW.0207, was originally requested and endorsed by Cattle Council and accepted by the Australian Animal Welfare Strategy Production Livestock Industry Working Group in 2013, as aligning the traditional southern Australian ‘muscle and fat’ scoring system with the northern ‘body condition’ scoring system of the time. Cattle Council suggests the TAC source a better diagram of the animal than the one being used and can supply one if needed.	



Specific Responses against TAC's questions	
<i>Questions about sourcing Bos taurus cattle (p. 19)</i>	
1.	By referencing the chart on p. 62 of the Issues Paper, it can be seen that the maximum BCS is 5; therefore, if Paragraph 1A 3.2(c)(iv) is to be retained, "or more" should be removed.
2.	<p>Additionally, the first of the ASEL Review Committee's two options (being the one supporting a maximum BCS of 5 for October to December) becomes irrelevant, as it represents no restriction whatsoever.</p> <p>Comments under #2&3 of the previous section are relevant to considering whether or not these two paragraphs need other amendments. Either way, there would be benefit in merging the two or, at the least, simplifying the wording.</p> <p>Cattle Council does support maintaining a case-by-case risk mitigation strategy on sourcing of <i>Bos taurus</i> cattle during particular months involving extreme weather differentials, particularly if these cattle have been pre-conditioned in some way.</p>
<i>Questions about maximum weight for cattle and buffalo to be exported by sea (p. 22)</i>	
1.	<p>Cattle Council is relatively comfortable with the current maximum weights and BCSs for cattle, but is willing to review its position if there is strong evidence in support of alterations.</p> <p>Regarding buffalo, the Australian Buffalo Industry Council's (ABIC) views take precedence; however, Cattle Council requests consideration be given to placing an eight-year age limit on sourced animals. Ageing buffaloes can be problematic; in such cases, a reduction in the maximum weight from 650kgs to, say, 550kgs could be considered. Shipping older buffaloes exposes the trade to unnecessary risk, particularly from undomesticated males, with high mortalities due to stress; these animals also pose a safety risk to stock handlers.</p> <p>Aside from the above, provided maximum limits are evidentially based, commercial forces and/or importing-country regulations will govern prevailing weights.</p>
2.	
3.	
4.	
<i>Questions about minimum hold times in registered premises (p. 24)</i>	
3.	Cattle Council supports the ASEL Review Steering Committee's Option 1 for cattle: <i>Status quo</i> , with the addition of, " <i>extended long-haul voyage – 3 clear days</i> ".
4.	Again, the ABIC takes precedence. Cattle Council requests an additional stipulation such that buffaloes be held in RPs for a minimum of one week. As buffaloes originate from free-range herds, they require a minimum period to adjust, particularly if they have been dehorned. Heart muscle collapse ('fish muscle') followed by death can occur when buffalo are over-exerted and stressed during the helicopter-mustering process in Northern Territory wetlands. Mortalities generally occur within the week, being one of reasons for the longer period proposed in RPs.
<i>Questions relating to pregnancy requirements (p. 27)</i>	
3.	<p>There are two significant projects underway at present that will have a bearing on the ASEL in respect of lay pregnancy testing:</p> <ul style="list-style-type: none"> i. Queensland is progressing legislative amendments to enable lay pregnancy testers to operate in that State; and ii. Cattle Council, Australian Livestock Exporters' Council and Australian Lot Feeders' Association are facilitating an MLA-commissioned project aimed at facilitating the development of a national standard for pregnancy testing. <p>AVA/ACV is involved in consultations for both projects, which are anticipated for completion in 2019.</p> <p>Assuming both projects are completed successfully and accredited lay pregnancy testers are accepted as providing a similar service under equivalent standards (including similar</p>



	<p>repercussions for non-compliance) as vets, there will be little to no justification for stipulating in ASEL that only vets can pregnancy test cattle for export.</p> <p>Having said this, Cattle Council acknowledges the time needed for completion of these projects and full implementation of any outcomes. Either ASEL can be worded more flexibly now to enable easy accommodation of the above projects later (this being Cattle Council's preference) or plans should be made for later amendments (less preferred). What is important is recognition of the national standard if and when it comes.</p> <p>The definition of <i>Competent Pregnancy Tester</i> (p. 10 of the Reformatted ASEL) makes reference only to WA and NT for accredited testers; these two dots points should be replaced with, "A competent pregnancy tester is a person accredited by the relevant agency of the State or Territory to conduct pregnancy tests", or similar.</p>
4.	<p>Cattle Council supports maintaining the '30-day period prior to export' for pregnancy testing, but this must be net of any delay. That is, if a delay in shipment causes the females to be held beyond 30 days, the original pregnancy testing certification should prevail to save them having to be retested.</p> <p>Regarding discretionary allowances for low-risk cases involving unjoined heifers, the process of verification to establish heifers are unjoined is unclear. Under a robust verification process, flexibility would be supported; however, further investigation is required to ensure 'unplanned joinings' are guarded against.</p> <p>Where shipping delays have occurred, welfare is a concern if animals are to be retested. If pregnancy testers were highly competent, there would be little to be gained from re-testing and much to lose because of the potential stress caused to the animal. A discretionary allowance is supported in this case.</p>
6.	See comments under #3 above.
7.	All pregnancy testers, whether lay or vets, should be accredited to conduct testing and would therefore be qualified to make a call as to whether the animal is too small for manual palpation. This assumes accreditation will be nationally standardised following the current CCA/ALEC/ALFA-requested project mentioned above.
8.	When adopted nationally, harmonised pregnancy testing standards will facilitate implementation of a national accreditation scheme. The more people in the scheme the lower the administration costs. Development of the tools and program will occur under an already agreed MLA funded project. Costs of managing the scheme will be dramatically reduced through the use of technology and data management, building compliance and traceability of pregnancy testing from the ground up.
SECTION 6 - STOCKING DENSITIES (p. 28)	
General Comment	
Having stocking densities as stringent as, or more stringent than, OIE's requirements would lend strength to the credibility of Australia's standards.	
Specific Responses against TAC's questions	
<i>Questions about stocking density (p. 31)</i>	
1.	<p>Cattle Council supports the principle behind allometric modelling for calculating stocking densities. [It would be useful for ASEL to include, perhaps in the Definition of 'allometrics', an explanation behind the formula, which seems to have originated from work in the 1980s based on that of D'Arcy Thomson (1917) and Julian Huxley (1932) and adapted by Petherick and Phillips in 2009].</p> <p>Also supported is a variation being applied for different livestock classes and different voyage lengths.</p> <p>It is important that allometric modelling is used as only one of the tools, albeit the main tool,</p>



	<p>for determining stocking densities: actual experience must be used to ‘inform’ whether or not densities are appropriate.</p> <p>In response to the research commissioned by ALEC for this review and being cognisant of the OIE recommendation that animals should have space to lie down simultaneously “in a normal lying posture”, Cattle Council supports the k value of 0.027 being used for calculating on-board stocking densities.</p>
2.	<p>Commercial viability and animal health and welfare go hand in hand. Any change in stocking density parameters would have to be developed in line with a holistic approach to the trade as opposed to just cost.</p>
3.	
4.	
<p><i>Questions about registered premises stocking density (p. 32)</i></p>	
1.	<p>Consistent with ALEC’s research, Cattle Council believes the stocking densities for RPs using the standard cattle unit of 500kgs should align with those in the National Feedlot Accreditation Scheme applicable to the standard cattle unit weight of 600kgs.</p> <p>Discretion in assigning higher stocking densities for smaller animals (e.g., 5m² for a 350kg animal during long stays) should be retained.</p>
2.	
<p>SECTION 7 – ON-BOARD RESOURCES AND MANAGEMENT (p. 33)</p>	
<p>General Comment</p> <p>Similar to its views on most other quantitative aspects of the ASEL, Cattle Council will await the TAC’s assessments around bedding, water, fodder and chaff requirements following the literature review and any additional research being conducted.</p>	
<p>Specific Responses against TAC’s questions</p>	
<p><i>Questions about bedding and ammonia levels (p. 35)</i></p>	
1.	<p>Cattle Council recognises the many variables to be considered, and simply states its support for the principle of ensuring all cattle are afforded bedding to enable adequate health and welfare for the duration of the voyage.</p> <p>Some classes of animals (e.g., pregnant breeders, bulls) may require more bedding than others.</p>
2.	<p>Regarding ammonia levels, the issue of ‘air velocity’ (as distinct from ‘ventilation’) again comes into play. High levels of ventilation <i>and</i> air velocity in combination are crucial in the event of heat, relative-humidity and ammonia built-up.</p>
3.	<p>Faecal pads reportedly offer efficient and protective flooring in feedlots and therefore, presumably, on vessels. Bedding can and should be used to manage these pads.</p>
4.	
<p><i>Questions about water, fodder and chaff requirements on vessels (p. 37)</i></p>	
1.	<p>Generally Cattle Council is supportive of feed requirements being standardised on the basis of nutrition requirements.</p> <p>The Council supports additional chaff being available for use in hot/humid conditions to reduce the heat produced from the animals, especially with high-risk animals.</p>
2.	<p>Will await the outcome of the R&D project cited in the Issues Paper.</p>
3.	<p>Automated water systems should be considered against viability. Such systems can malfunction and cause serious flooding and unexpected loss of on-board drinking water.</p>
4.	<p>There should be a feed contingency for <i>all</i> voyages to cover potential delays; the size of the contingency would be determined against the length of the voyage.</p>



SECTION 8 – ON-BOARD PERSONNEL, ANIMAL MANAGEMENT AND CARE (p. 38)	
General Comment	
Cattle Council understands there is considerable political pressure for Independent Observers to be appointed for all voyages.	
Specific Responses against TAC's questions	
<i>Questions about on-board personnel and the monitoring and management of animals (p. 40)</i>	
1.	As the name suggests, Australian Government Accredited Vets (AAVs) are accredited by the Government – but the exporter pays them. If the Government were to pay AAVs, they would be independent of the exporters and could then be the Independent Observers being demanded by the Minister. Cattle Council urges the Federal Government to pay for the AAVs rather than appoint IOs <i>additional to</i> the AAVs. Regarding short-haul voyages, Cattle Council requests consideration of AAVs/IOs being included on a 'random' or a 'risk-alert' basis and, as mentioned, be paid by the Government. If an AAV/IO is to accompany every voyage, accredited stock handlers should be in sufficient numbers to ensure livestock are optimally observed, with the AAV/IO being informed on a regular basis of any developments. AAVs, IOs and stock handlers should sit the stock persons' accreditation course or be recognised as having prior learning with the handling of cattle.
2.	
3.	Cattle Council favours the Review Committee's Option 3 – <i>Mandatory AAVs: an accredited veterinarian must be appointed to accompany all consignments</i> , but with two caveats: that the AAV is considered as the IO and not additional to an IO (as described under 1&2 above); and that numbers of stock handlers are adjusted to suit the size of the shipments and length of the voyage.
4.	The presence of IOs on vessels should not duplicate the presence of AAVs (see comment under points 1&2 above).
5.	Accredited stockpersons should carry the responsibility of interaction with the livestock to ensure care and welfare are maximised.
6.	The cost of the AAV/IO should be borne by the Government so they can be deemed truly 'independent'. With the Government paying, there should be either an IO or an AAV (not both) on voyages.
7.	It is impractical to expect stockpersons to observe <i>all</i> animals simultaneously <i>all</i> the time; however, their interaction with the livestock must be managed efficiently by the supervising AAV to ensure interface time is maximised, particularly during high-risk periods. Guidance should be given to AAVs on how best this can be done.
<i>Questions about vulnerable/special classes of animals (p. 41)</i>	
1.	All vulnerable species or classes within species should be subject to an adequate segregation, which should be available with specific reference within ASEL. As mentioned earlier, there is strong justification for specific standards to cover the management of buffaloes. To reiterate, these would relate to maximum weight and minimum days held in RPs and reflect the potential stresses resulting from the dramatic changes in their living conditions after being 'harvested'.
2.	
SECTION 9 – MINOR AMENDMENTS (p. 42)	
3.	As mentioned earlier (under Section 5, General Comment), Cattle Council supports use of the updated Body Condition Score for cattle, as approved by industry in 2013, and recommends sourcing of a better cattle diagram or diagrams to accompany the chart.



4.	When the list of 'Definitions' has been reviewed (as requested by ALEC and others), it would be useful to identify words throughout the ASEL text that have definitions included in the list. An example of this practice can be found in the Animal Welfare Standards and Guidelines where words with definitions are hyperlinked to the definition itself. <i>The Australian Animal Welfare Standards and Guidelines for Livestock at Saleyards and Depots</i> were finalised in February 2018 and should be crosschecked for consistencies and definitions, and referenced if appropriate.
5.	Agree with the amendment of Appendix F, Table #10's heading.
6.	Agree with the conditions under which upcoming amendments to Appendix F – mandatory veterinary medicines, are made.
7.	
11.	Cattle Council has concerns with the current dehorning/tipping requirement. The current requirement in ASEL is for 12cm horns, but pedantic interpretation of the rule is causing unnecessary tipping before export. Also, while <i>Bos taurus</i> cattle can have very pointy horns that require tipping, <i>Bos indicus</i> cattle more commonly have heavy, blunt horns or scurs, which lead to unnecessary damage and stress if dehorned or tipped. An option for consideration involves extending the allowable length to 14cm and providing an exemption from tipping for blunt horns and scurs. Cattle Council acknowledges most exported cattle have either clean heads or are polled.
15.	Cattle Council agrees with the change for sheep export exclusions to be geographic, not by port.
16.	Agree with the deletion of paragraph 2B.1(c).
17.	Agree with the retention of paragraphs 2B.6(a) and (b).
18.	
19.	Agree with the amendment to paragraph 3A.3.2(h).

OTHER ISSUES

Finally, following is a list of issues considered by Cattle Council as worthy of mention but otherwise not covered in the above table.

1. Add into paragraph 1A.3.2(c) *Rejection Criteria*, cattle treated for Johne's disease using Silirum. These cattle can produce false-positive results if tested overseas for JD infection and, more importantly, bovine TB, which is now exotic to Australia. Silirum-treated cattle are, or will be, permanently identified in two ways: with a three-hole earmark (preferably the right ear) and with a 'JDV' or 'JDP' status in the NLIS database. Most treated cattle will be dairy heifers.
2. Under the definition for *Animal Welfare*, reference is made to "the internationally recognised 'five freedoms'". It is reasonable to observe the 'five domains', which incorporate 'positive welfare states', are superseding the five freedoms. [See Mellor, D.J. and Beausoleil, N.J. (2015), *Extending the 'Five Domains' model for animal welfare assessment to incorporate positive welfare states*, *Animal Welfare* 24: 241-253.] The five domains more accurately reflect the reality of good welfare practice.
3. Livestock producers have an important role in backgrounding livestock for voyages. This involves having livestock practiced at being fed and watered from troughs, and being handled by people.



4. There should be oversight of adoption of relevant R&D findings as soon as possible after their release. The vessels need to adhere to strict AMSA regulations and reviews.
5. 'Disembarkation' is defined, but not 'embarkation'.
6. Under 2B.2, reference is made to 'competent personnel', 'sufficient personnel' and 'competent person'. Presumably such inconsistency will be picked up in final editing.
7. Under paragraph 4E.2, *Record keeping*, reference is made to "vendor declarations for each consignment regarding the property of origin and health and welfare status of the livestock..." It should be clarified here that the form being referenced is the 'Animal [cattle, sheep, goat] Health Declaration, not the National Vendor Declaration that covers food-safety-related issues like residues.
8. In the footnote at the bottom of Appendix F, Table #10, *Ceftiofur* (note the spelling error in the ASEL) is mentioned as useful for the treatment of BRD. It should be noted that Ceftiofur is on the OneHealth danger list as being an antibiotic common to both animals and humans and must be used judiciously and sparingly.

