

27 November 2020

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Via: animal.welfare@agriculture.gov.au

Dear Dr Sheridan

Review of *Bos taurus* cattle exports from Southern Australia

Thank you for the opportunity to comment on the Review of Heat and Cold Stress in *Bos taurus* Cattle from Southern Australia during Long Haul Export by Sea Stakeholder - Consultation Paper. We are grateful for this review being prioritised as the conditions depicted in the Independent Observer reports from these voyages are very concerning.

We would like to reiterate our request for the advice of the Independent Panel to be made public, or at the very least, for stakeholders to be given access to this advice. This will be important for enhancing the transparency of the process and our confidence in the review's recommendations.

We have had the benefit of receiving an analysis of conditions depicted in Independent Observer reports from 37 cattle voyages to China between July 2017 and December 2019. This analysis was conducted by Dr Sue Foster of Vets Against Live Export and we have permission to circulate it to the Department for the purposes of the review; please find **attached**. The analysis contains useful data that we hope will be of assistance to the review team in informing the development of the draft review paper for public consultation. As the analysis is currently being prepared for publication, we ask that it be treated as confidential and not published or distributed beyond the Department.

Key issues that we would like to highlight for special attention include the following:

Heat and cold stress

The analysis notes that 35% of voyages recorded heat stress and another 24% had either clinical descriptions consistent with heat stress or wet bulb temperatures that exceeded the Department's heat stress thresholds for the relevant class of cattle. These incidents occurred at various times of the year but primarily as the vessels crossed the equatorial region. These findings are also broadly consistent with data provided by the Minister in response to questions raised in the Senate, indicating that Observers reported varying

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degrees of heat stress on 49% of voyages carrying *Bos taurus* cattle over the equator in the 2019 calendar year.¹

In addition to heat stress, *Bos taurus* cattle exported into the Northern Hemisphere winter period are often subject to cold stress from exposure to very low temperatures. The analysis identified that approximately 19% of voyages experienced temperatures of below 2 °C, with all of these occurring during the December to February (inclusive) period. Compounding the stressors of these voyages were the extreme temperature variations. One voyage from Portland to the Port of Rongcheng in Northern China (IO Report 59) in January 2019, experienced temperature variation of 42 °C, ranging from 32 °C while sailing over the equator and dropping to -10 °C when arriving in Port only several days later. While the Observer Report makes no reference to hyperthermia, it does note that “over 500 treatments were administered” (accounting for over 20% of the cattle), for conditions including lameness, respiratory and ocular disease. Temperature fluctuations of this magnitude place significant stress on the animals’ ability to thermoregulate and maintain normothermia resulting in states of hypothermia and hyperthermia, sometimes on the same voyage.

It is clear that measures need to be put in place to ensure animals are protected from these weather extremes. We note the ASEL Review Technical Committee recommended that a HSRA be developed for all voyages crossing the equator, which the Department supported. In light of the extreme cold temperatures occurring in the Northern Winter period of December to February (inclusive), we believe that voyages to the Northern Hemisphere during this period should cease. In the absence of seasonal export restrictions, we believe the Department should develop a Cold Stress Risk Assessment model, equivalent to the Heat Stress Risk Assessment model, and that this should also factor in additional stressors associated with extreme temperature variations.

Poor pen conditions

The analysis found that 78% of consignments experienced wet, sloppy pad conditions at various times during the voyages, and 41% had insufficient bedding material. Many of the images show cattle with heavy faecal jacketing. Such poor conditions can accentuate the prevalence of physical and thermal discomfort, ammonia levels, essential behaviours such as lying and resting, and the risks of trauma and infections.

We request that the review panel place particular focus on the adequacy of current bedding and wash down requirements with a view to ensuring pen conditions are significantly improved.

Inadequate food supplies

It was deeply concerning to learn that food issues were detailed in 43% of voyages, including food insufficiency detected in 27% of voyages. At least 16% of voyages exceeded the planned journey time by more than the additional three days of food provisions. Of these, 11% had to ration food, or exhausted food supplies entirely, during the voyage. This can also place incredible pressure on the ship’s captain and crew to reach port within a certain period of time despite unforeseen delays and weather conditions. This can lead to the taking of unnecessary risks placing the safety of crew and animals in jeopardy.

We find this to be completely unacceptable and call for urgent action to be taken to ensure that food supply issues do not continue occurring and that stronger food contingencies are put in place. Under no circumstances should voyages experience food shortages on such a regular basis.

¹ Response to Senate Question No 1533, 14 May 2020.

Lack of veterinary treatment

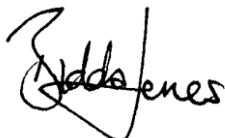
Finally, we would like to highlight the issue of insufficient veterinary care. Long-haul voyages of *Bos taurus* cattle going over the equator are high risk as evidenced by the long list of issues identified in the analysis. It is therefore concerning to learn that only 41% of these voyages have a veterinarian onboard. The analysis shows that when veterinarians are onboard more treatments are prescribed and more definitive causes for mortality are identified.

We note the ASEL Technical Review Committee recommended that “an AAV must accompany each consignment on long haul voyages...unless otherwise agreed by the department.” The Department supported this recommendation in principle stating that it would be “implemented as soon as practical” and that the Department would engage in further consultation on the recommendation given that some vessels have limited accommodation.

RSPCA Australia’s long held position is that veterinarians should accompany all livestock export voyages. The need for veterinarians onboard long-haul and other high-risk voyages including *Bos taurus* cattle going over the equator is clear. We ask the review panel to consider the status of this recommendation with a view to ensuring veterinarians are required on all long-haul *Bos taurus* cattle exports over the equator.

We trust this overview of key issues has been of assistance. We look forward to working with the review team and seeing the timely implementation of improvements to this trade.

Yours sincerely,

A handwritten signature in black ink that reads 'Bidda Jones'. The signature is written in a cursive, flowing style.

Dr Bidda Jones
Chief Science and Strategy Officer
RSPCA Australia