| Section | RSPCA Comments |
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| **Section 1: AApl Animal Welfare/Supply Chain Management Standards** | |
| **AApl 01 Selection Standards** | |
| **AApl 1.1 General and all species requirements** | This section should also consider including the following general requirements:<br>- Unfamiliar animals should not be mixed together<br>- Horned and unhorned animals should not be mixed, unless they have been reared together |
| **1.1.3** | RSPCA strongly recommends that AApl surpass the current ESCAS and ASEL requirements as listed in this section by adding that:<br>- All animals shall be individually identified<br><br>Individual identification is crucial to animal welfare because the welfare of an animal cannot be adequately assessed or monitored in groups. Individual identification should be a requirement of all exported livestock species to allow for supply chain traceability and control. |
| **1.2** | The RSPCA does not support the export of buffalo. There are significant and serious animal welfare and mortality issues with the mustering, road transport, confinement and export of feral buffalo. Feral buffalo are completely unfamiliar with human contact and do not tolerate handling and transport without serious welfare compromise. These problems carry over into importing countries to the point of slaughter.<br><br>Therefore, the RSPCA recommends that the standards should not permit the export of buffalo. |
| **1.2.5** | This section should include requirements for pain relief when animals undergo spaying procedure. It is recommended that pain relief in the form of both LA and an NSAID be administered during painful procedures.<br><br>1.2.5d Add "Registered veterinarians may use ultrasound if the animal is too small to be manually palpated," as per ASEL 3.2 under section |
| **1.2.6** | Correct error – there are two sections denoted as (a). The second one should be corrected to section b:<br><br>AApl 1.2.6<br>Female buffalo sourced for export as breeder Livestock must be no more than 220 days pregnant at the scheduled date of discharge in the importing country, and must be pregnancy tested within 30 days prior to export: |

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| | a) by a registered veterinarian using an approved blood test; and<br>i) if the test result is negative, be certified in<br>writng as not detectably pregnant; or<br>ii)<br>if the test result is positive, undergo<br>testing as per b) or c) below; or<br>a. by a registered veterinarian that attests to current experience and<br>competency in buffalo pregnancy diagnosis, using manual palpation and<br>only if the voyage is less than 10 voyage days; and<br>i) if the test result is negative, be certified in writing as not<br>detectably pregnant; or<br>ii) if the test result is positive, be certified in writing as<br>pregnant with number of days pregnant stated; or |
| **Exclude sourcing for camelids, deer and goats** | The RSPCA notes that camelids and deer are excluded from the standards. We support prohibiting camelids, deer and goats from the live export trade because previous extreme mortality events have shown that they cannot tolerate live export by sea and that their welfare is severely compromised. There is also insufficient expertise and infrastructure in the live export supply chain to manage these species at sea and such export is unnecessary when air transport is available as a safer cost-effective option.<br><br>On this basis we believe the standards should not permit the export of feral goats, camelids and deer by sea. |
| **1.3.3** | The definition of 'Heat stress risk assessment (HSRA)' must ensure that it includes reference to the change in risk settings. The change in risk settings from mortality to animal welfare measures is a fundamental change in the regulatory parameters of the trade. This should therefore be explicitly referred to as opposed to simply leaving them open to the Department of the day to approve.<br>The RSPCA recommends that the aim of setting 'reportable' mortality rates should be to trigger the investigation of voyages that have unusually high levels of mortality. For reportable mortality rates to drive continuous improvement they need to be linked to actual rates: those consignments that report high rates compared to the majority of recent voyages should be investigated, rather than using a static level that does not change over time. In addition to investigating 'high' mortality voyages, all voyages should be subject to random audits of the Masters report, AAV/Stockperson reports and reports from Departmental Observers. This should include actions to confirm the accuracy of these reports and seek further clarification of those records where necessary. |
| **AApl 1.5** | **Sheep sourcing and export criteria**<br>RSPCA advocates for an end to the export of live sheep because the trade subjects sheep to conditions that animal welfare science has shown are beyond the physiological tolerance of sheep. |
| **AApl 02 Animal Handling Standards (Movement, Welfare, Slaughter, Emergency Slaughter, Mortalities)** | |

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| **AApl 2.1.1** | This should include guidance as to sample size of animals that is assessed when assessing compliance. This could be done on a percentage basis depending on the size of facility. |
| **AApl 2.1.2** | Focus should be on the outcome in that animals should be moved using low stress best practice handling methods (e.g., using flight zones effectively). The current language of 'unnecessary' pressure is vague and should be modified to clearly articulate the specific requirements. For example, clearer wording would be: "Animals should not be pressured or rushed or excited when they are already moving or when they have nowhere to move to." |
| **AApl 2.1.4** | RSPCA strongly recommends that AApl removes the inclusion that it is acceptable to use battery-powered goads for any purpose, because these devices cause pain and suffering to animals. RSPCA does not support the use of electric goads under any circumstances as because scientific evidence indicates that such devices cause significant stress to an animal. The inclusion of goads does not align with sections 2.1 nor 2.2. RSPCA is opposed to the use of electric goads/prods for handling animals. Electric goads are a significant stressor to animals and result in unavoidable negative animal welfare outcomes where used. |
| **AApl 2.2** | **Livestock must not be subjected to procedures that cause pain and suffering** |
| **AApl 2.2.1** | The use of electric and battery-powered goads/prods is unacceptable because animal welfare science shows that such devices cause pain and suffering to animals. Therefore, RSPCA strongly recommends that any type of goad or prod be prohibited by adding them to S2.2.1 under the third dot point that prohibits "Use of implements that cause suffering: includes but not limited to..." Adding these devices to this section will assist in improving animal welfare by dispelling the use of goads/prods as common or acceptable handling practices, which they are not. |
| **AApl 2.2.2** | RSPCA is opposed to the use of electric goads/prods for handling animals. We recommend deleting this Standard because it allows the use of electric prods/goads. The use of electric or battery-powered goads/prods is considered poor animal welfare by contemporary animal welfare science.<br><br>If electric goads remain permitted then the list of inappropriate use should also include – any young animal <6months, any pregnant animals, where animals are unable to get away. |
| | Clarification is required as to what is considered 'twice during one handling events'. Further details should be included on assessment methodology. For example, assessing electric prodder use in cattle as per AMIC Guidance document states:<br><br>*Assess 50 - 100 animals to calculate the percentage of animals handled with the electric goad. Touching an animal with and electric goad is counted, whether a shock is delivered or not. Do not count multiple applications of the goad on a single animal as individual events.* |

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| **AApl 2.4.1** | Any animal that is unable to move, or that falls down, or is lame must not be moved and killed in-situ as soon as possible.<br><br>Modify wording of this standard to better reflect the WOAH's Article 7.5.4 (9) which states that: *Animals which are sick, weak, injured or showing visible signs of distress should be separated, and veterinary advice should be sought immediately regarding treatment or the animals should be humanely killed immediately if necessary.*<br><br>Modify the wording of the second sentence in is Standard from "Downer cattle and buffalo should not be moved and should be slaughtered where they lie," to "Downer cattle and buffalo should not be moved and should be humanely euthanised where they lie to end further pain or suffering." |
| | Additional standard needed to account for species other than cattle or buffalo. We suggest the following wording:<br><br>No animal should be moved if movement will cause further pain or distress; thus if sheep or goats cannot walk unaided they should not be moved if this causes them pain or distress; nor should cattle or buffalo be moved even if they can walk unaided if this would cause them pain or distress. |
| **AApl 2.4.2** | Modify the wording of this standard from "Livestock that are unfit to transport are not loaded for transport," to "Animals that are unfit to transport are segregated, not loaded for transport and tended to by a veterinarian or humanely euthanised to end further pain or suffering." |
| **AApl 2.4.3** | Additional standards are required to ensure all aspects of abattoir lairage design and construction as set out in WOAH Article 7.5.3 are covered. For example, 7.5.3 2(b) specifies: passageways and races should be arranged in such a way as to permit inspection of animals at any time, and to permit the removal of sick or injured animals when considered to be appropriate, for which separate appropriate accommodation should be provided.<br><br>Modify the wording of this Standard from "Facilities and equipment are available on-site to segregate, treat or humanely dispose of livestock (that are unfit to transport," to "Facilities and equipment are available on-site to segregate, treat or humanely euthanise animals that are unfit to transport." |
| **AApl 2.4.4** | The statement about inappropriate handling would be better placed under 2.4.1 - perhaps a typo? |
| **AApl 2.4.5** | The term 'promptly' should be defined to clarification what is meant. We recommend modifying the wording of this standard from "Livestock requiring immediate slaughter on welfare grounds are identified and promptly dealt with," to "Animals requiring euthanasia on welfare grounds are identified and humanely euthanised as quickly as possible." |

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| **AApl 2.7** | **Clean water must be available and accessible to all livestock** |
| **AApl 2.7.1** | The wording of this Standard is ambiguous. RSPCA recommends modifying the wording of this Standard from "Pens (where livestock are held) have facilities for the provision of water and water is available," to "Sufficient fresh water is provided for animals in holding pens to meet the needs of that species," It is imperative that automated water systems are mandatory on all vessels. Water should be provided adlib and available to all animals as soon as they are loaded onto the vessel. Provisions must be in place for back up water access should water supply issues arise, (insecure water troughs, leaking hoses or the water systems breaking down occurred on over 40% of voyages carrying cattle from Australia to China over an 18-month period between July 2018 to December 2019) [1].<br><br>RSPCA recommends the standards specify feed and water rations by species and weight giving special consideration to the temperatures that the animals will be subjected to.<br><br>Cattle need to consume large volumes of water to meet maintenance needs. Water deprivation largely impacts animal welfare and can hinder biological functioning (has been associated with morbidity and, in cases of extreme deprivation, mortality). It is also associated with negative affective states. The volume of water required by livestock increases under conditions of increased temperature and humidity (often experienced during transit) It is often "justified" that ruminants can endure longer periods of water deprivation compared to monogastric/ other animals due to their ability to draw from the rumen to maintain fluid balance. However, it should be noted that if given the opportunity to exercise choice with water freely available, cattle will drink more frequently, usually 2–5 times per day. The role of the rumen as a fluid “store” also assumes that the animals are well fed and hydrated but cattle in the live export industry are exposed to several periods of enforced feed and water deprivation including during mustering, yarding and prior to and during road transport. Hormones released as part of the stress response (including the response to handling, novel environments, and transport) can also have a diuretic effect that contributes to dehydration in sheep and possibly other ruminants. Should not be seen as adequate that although livestock can adapt to survive brief periods of low water availability, that the animal’s welfare is not compromised prior to reaching their survival limits [2]. Necessary to highlight that under some shipboard conditions, even short periods of water deprivation on a ship can be fatal for vulnerable animals that may be ill or have gone undetected for illness upon boarding. |
| **AApl 2.8** | **Feed of sufficient quantity and quality must be provided to all livestock held over 12 hours** |
| | The World Organisation for Animal Health (WOAH) Article 7.5.4 (6) states: *Waiting time should be minimised and should not exceed 12 hours. If animals are not to be slaughtered within this period, suitable feed should be available to the animals on arrival and at intervals appropriate to the species.* Therefore, Standards should specify that if the intent is for animals to be held over 12 hours they should be provided with feed, not to wait 12 hours before providing them with feed. The standards must specify appropriate feeding intervals for each species.<br><br>Modify the wording of this Standard from "Feed of sufficient quantity and quality must be provided to all livestock held over 12 hours," to "All animals should be provided with feed of sufficient quantity and quality for their species and size on arrival unless they are to be slaughtered within 12 hours of receival." |

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| | RSPCA recommends that the AApl Standards should specify the requirements for feed to also account for acclimatisation and calculation for daily rations to ensure appropriate feed is stored on ship etc and available. Appropriate holding time prior to loading to allow acclimatisation to feed pellets would be recommended to be 7 days. According to Makin et al 2010 [12] sheep are at a lower risk of mortality if they are maintained for 7 days compared to those maintained for 3 to 6 days prior to loading.<br><br>Regarding the WOAH recommendation currently reads:<br>*Feedlot nutrition (OIE recommendation) – Person responsible for the livestock should have adequate knowledge of appropriate body condition specific to the species and should not allow body condition to fall outside an acceptable range. They should also understand the impact of livestock size and age, weather patterns, diet composition and sudden dietary changes in respect to digestive upsets and their negative consequences (e.g. acidosis, bloat, liver abscess and laminitis).*<br><br>RSPCA recommends that requirements for training and competency assessments are added specific to body condition scoring and management. Proposed rewording:<br>Feedlot nutrition (OIE recommendation) – Person responsible for the livestock should have adequate knowledge, training and be deemed competent to assess body condition specific to the species and should not allow body condition to fall outside an acceptable range. They should also understand the impact of livestock size and age, weather patterns, diet composition and sudden dietary changes in respect to digestive upsets and their negative consequences (e.g. acidosis, bloat, liver abscess and laminitis). |
| **AApl 2.9.1** | The wording of this standard is vague - there is no reporting mechanism or action defined on how to manage heat/cold stress, or on what alternative arrangements should be if heat/cold stress is not alleviated.<br><br>It is crucial that the standards specify that shelter is needed to adequately protect animals from hot and cold climatic conditions and predators. RSPCA recommends that the wording of this Standard should be modified from " Livestock are provided with shade/shelter or there are alternative arrangements in place to prevent or alleviate heat/cold stress," to "Animals are provided with shade and shelter for protection from predators and the elements." This should include the requirement that shade and shelter should be adequate to meet the needs of all animals in the pen simultaneously. |
| **AApl 2.11** | **The method of restraint employed must be designed and operated effectively for the size and class of livestock processed** |
| | Wording should be revised to adequately reflect the wording of Article 7.5.2 4(b) which states: *Methods of restraint causing avoidable suffering should not be used in conscious animals because they cause severe pain and stress.* Standards should ensure restraints used do not cause avoidable suffering.<br><br>The use of restraint that rotates or inverts animals while conscious should be prohibited.<br><br>RSPCA is opposed to any form of restraint that rotates or inverts animals while conscious. Rotating restraint where animals are forced into lateral recumbency (90°) or dorsal inverted (180°) while conscious causes unavoidable stress to animals. Due to the animal welfare |

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| | concerns associated with rotating restraint several EU countries, the UK, and Australia all prohibit the use of rotating restraint for conscious animals. These animal welfare issues include the unnatural posture, abdominal pressure on visceral tissues, stress from inversion, and the prolonged period of inversion. Cattle when inverted have been demonstrated to have significantly increased cortisol concentrations in comparison to those in upright restraint, confirming that inversion causes more stress to cattle than when in upright restraint. Additionally, cattle in rotating restraint show significantly more incidences of vocalisation per animal, which is an indication of distress and poor cattle welfare.<br><br>The Mirabito (2015) report assessing the welfare and socio-economic implications of restraining systems of bovines during unstunned slaughter highlights that rotating restraint has more animal welfare concerns and causes significantly more stress to cattle in comparison to upright restraint. The animal welfare concerns with rotating restraint are inherent and unavoidable when forcing animals into lateral recumbency or full inversion while conscious. Whereas the animal welfare concerns associated with upright restraint can be addressed through better design and management.<br><br>There is no detail provided on how vocalisation in restraint will be assessed against the standards – how would this be assessed? |
| | Additional Standard (2.11.7) should be added to require documentation and recording of falls, slips and vocalisations. |
| **AApl 2.11.1** | Modify the wording of this standard from OIE Terrestrial Code to WOH Terrestrial Code as the OIE has rebranded and is now referred to as the World Organsiation for Animal Health (WOAH). |
| **AApl 2.11.5** | This standard refers to the allowable limit of vocalisation of 5% in observed cattle, however, there is no provisions on how this will be monitored, recorded and evaluated over time. RSPCA recommends that an additional standard be added to address this matter (e.g. 2.11.7) to require documentation and recording of falls, slips and vocalisations. |
| **Additional standard** | RSPCA strongly recommends AApl include a standard that requires mandatory stunning before slaughter. The standards should require that all livestock are effectively stunned and rendered insensible to pain before slaughter to cover all relevant clauses of WOAH Article 7.5.8. Stunning is intended to cause unconsciousness in an animal before slaughter so that the bleed-out may be carried out without causing the animal fear, anxiety, pain, suffering, or distress. Without stunning animals may be conscious when slaughtered and bled out. Standards that require stunning will support better animal welfare and will also provide a point of difference between AApl Standards and other live export standards such as ESCAS and LGAP [3,4,5]. |
| **AApl 2.12** | There must be a back-up procedure to stunning. If an initial stun is ineffective, a re-stun must be applied immediately. |
| | Standard should specify that the backup stunning device should exceed or match the specifications of the primary stunning device; e.g., if the primary device is a non-penetrative captive bolt the back-up device is a penetrative captive bolt. Suggested wording: The back-up stunning device must be equivalent to or exceed the specifications of the primary stunning device and be available for immediate use. |

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| **AApl 2.12.2** | This contradicts AApl 2.12 where animals must be re-stunned immediately. If animals are ineffectively stunned they should be re-stunned immediately. |
| **AApl 2.13**<br><br>**Non-penetrating captive bolt and captive bolt** | Non-penetrating captive bolt stunning should not be recommended for used in mature bulls or Bos indicus cattle. For these classes for cattle penetrating captive bolt is preferred.<br><br>Head restraint should be used in non-penetrating and penetrating captive bolt and electrical stunning methods to allow appropriate stun positioning to allow for effective stunning. |
| **Additional standard** | Many of the restraint and slaughter methods permitted under these standards require a 'High level of operator competency' and/or 'proper design and operation of equipment' according to WOAH Articles 7.5.6 and 7.5.9. They are:<br>- Restraining and/or conveying methods<br>- Restraining by inversion (noting that this does not meet the requirement of Article 7.5.2 4(b))<br>- All methods of stunning<br>- Bleeding out by severance of blood vessels in the neck without stunning<br><br>RSPCA recommends that personnel involved in livestock slaughtering must have a high level of competency in:<br>- operation and maintenance of restraint equipment<br>- operation and maintenance of stunning equipment<br>- operation and maintenance of slaughter equipment<br><br>AApl standards should specify these competencies and require documentation that operators have achieved the required level of competency for these methods. |
| **AApl 2.13.1** | Additional standards are required to reflect limitations of different stunning methods as standards. This should include suitable species for each method, placement and stun to stick intervals. |
| **AApl 2.13**<br><br>**Buffalo** | Non-penetrative stunning and head-only electrical stunning should be prohibited for stunning buffalo. The anatomy of buffalos' heads is significantly different from domestic cattle. The frontal and the paranasal sinuses are wider in buffaloes when compared with cattle (e.g., the median distance from the frontal skin surface to the inner bone table is 7.4 cm in water buffaloes and 3.6 cm in cattle). The brain in buffalos also sits under the crown of the skull with a shorter distance between the eyes and base of the horn, meaning it is more protected than in domestic cattle. In addition to this, these anatomical features vary significantly depending on breed, sex and age of buffaloes.<br><br>Due to buffalos' thick skulls non-penetrative captive bolt guns are unable to achieve a reliable or effective stun particularly when using a frontal position. Small and White (2020) found non-penetrative captive bolt even when utilising a poll position was only able to achieve a ~76% first stun success rate (26 out of 34 animals). Therefore, non-penetrative captive bolt guns should not be allowed for use stunning buffalo given the welfare concerns of animals being ineffectively stunned or regaining consciousness during bleed out. |

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| | The European Union Food Safety Authority (EFSA) has recommended that an occipital/poll position for captive penetrating bolt or high power ballistic 'firearm' if using a frontal position when stunning buffalo. There is also no evidence available that electrical stunning systems have been validated to be effective at stunning buffalo. Therefore, the RSPCA strongly recommends that electrical stunning should not be used on buffalo [6,7]. |
| **AApl 2.14** | RSPCA strongly opposes all forms of slaughter that does not involve prior stunning of animals. Slaughter without stunning results in animals experiencing pain from the neck cut while conscious and it has been demonstrated that time to loss of consciousness can take up to several minutes suggesting a prolonged period of suffering and stress during bleed out if un-stunned. |
| **AApl 2.15.1** | Suggest this requirement is more consistent with other standards such as the AMIC Industry Animal Welfare Standards and NAMI Guidelines - at least 96% of animals are stunned effectively with the first application of the stunning method for penetrating captive bolt and nonpenetrating percussive devices are used; and at least 99% of animals have the electrodes applied in the optimum position for electrical stunning and 98% or more of the animals show no sign of starting the process of return of consciousness. |
| | Further detail needed in the standard to better reflect WOAH Article 7.5.7. |
| **AApl 2.18 F** | RSPCA recommends that these stunning methods should be specific and also include the outcome that animals remain unconscious after stunning and remain unconsciousness during bleed out until death. |
| **AApl 2.20** | RSPCA strongly opposes all forms of slaughter that does not involve prior stunning of animals. RSPCA strongly recommends AApl delete this standard, and require mandatory stunning before slaughter in all circumstances to genuinely improve animal welfare in live export. |
| **AApl 2.22** | Similar to the AApl 2.15.2 for assessing signs of effective stunning, the standards should include signs of confirming death prior to further processing. |
| **Additional standard** | WOAH guidelines emphasise the need to discourage the practice of removing 'hypothetical blood clots just after the bleeding' as this 'may increase animal suffering'. A standard is needed to ensure action is only taken when clots are present and occluding the vessels.<br><br>RSPCA recommends adding advice on signs of occlusion and what is 'a strong flow of blood' versus' versus when 'flow is not sufficient' to mitigate animal suffering. |
| **AApl 2.23.1** | Current evidence suggests it is unlikely that fetuses are capable of conscious perception while developing in the uterus. It is therefore important that fetuses do not breathe air and do not have the opportunity to oxygenate their brain to levels compatible with consciousness. Research suggests that as long as the fetus has not breathed air it is not conscious and therefore is not at risk of suffering. A fetus should therefore be left in the uterus until they are confirmed dead. The EFSA and WOAH recommend that a fetus should be left undisturbed in the uterus for 30 minutes after the death of their mother to ensure it is dead. Fetal blood collection should also occur while fetus remain enclosed in the uterus [8, 9,10,11]. |

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| | Suggest increasing time from 5 to 30 minutes that the fetus is not removed from the uterus (either in its entirety or partly exposed) after the cow is slaughtered. |
| | This standard requires further specificity on how fetuses should be killed. The use of a captive bolt is the surest way to ensure a humane death. RSPCA recommends adding wording to specify that where a live foetus is identified, the animal shall be immediately killed using a captive bolt. |
| **AApl 2.24** | This standard should require provision and documentation of annual training in facility SOPs, and evaluation of staff competency against the SOPs. RSPCA recommends expanding this standard to require all personnel engaged in the unloading, moving, lairage, care, restraint, stunning, slaughter and bleeding of animals are assessed annually for competency and knowledge in accordance with WOAH Article 7.5.1 (2). |
| **AApl 03 Quarantine** | |
| **AApl 3.2.3** | RSPCA recommends that this standard be revised to ensure all animals will be individually identified. Group identification does not allow for effective traceability and will undermine the capacity of the standards to provide supply chain level assurance. |
| **3.1.6** | RSPCA commends the requirement for CCTV. We recommend mandatory CCTV or equivalent monitoring technology for real-time monitoring, verification and auditing of animal welfare. CCTV can assist in identifying animal welfare issues that may be missed by physical observation. For CCTV monitoring to be meaningful it must provide a clear view of animals in all areas where live animals are handled, and that the footage can be viewed real-time as well as stored for verification and auditing purposes. In addition to being a valuable tool for animal welfare CCTV also demonstrate staff compliance with work instructions and can be used for staff training and verification purposes. |
| **3.7.8** | The RSPCA do not support any shipment of live sheep to the middle east during the Northern Hemisphere Summer, inclusive of May 1 to October 31, due to the significant risk of heat stress during this period. |
| **AApl 04 Transport (Trucks, Vessel, Plane)** | |
| **4.1.4** | The RSPCA opposes the use of dogs or electric goads during loading and unloading animals for transport. |
| **4.2** | Typo – should read “outlines the requirements”. |
| **4.2.8 and 4.2.9** | Refer to Standards 4.1.9 and 4.1.12 which are not included in the draft standards and therefore cannot be assessed as to the meaning. |
| **4.2.12** | The RSPCA does not support the ration of 1 stock handler per 30,000 sheep as this will not provide sufficient oversight of sheep to manage animal welfare risks. This standard should be expanded to meet the WOAH requirement for the provision of a 'sufficient number of personnel' to carry out tasks in accordance with its animal welfare principles, see Article 7.5.1 (2). |

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| | There is no reference to independent observers or other independent opportunities for management and observation of animal welfare. RSPCA recommends that the standards is expanded to include this. |
| **4.2.16** | Refers to 'an outbreak of a disease during the voyage' this should be specified to be amongst the staff/crew AND the animals to ensure contingency plans are drawn up to cover both risks. |
| **4.2.17** | Written instructions provided must be understandable and accessible by the crew on board the ship and therefore must be provided in the most appropriate language for the crew to ensure they are accessible and can be understood easily. |
| **4.3** | Stocking density rates should be consistent with allometric requirements for all animals to be lying down at the same time; for all animals to easily access food and water; for all animals to be able to move freely; for the identification of shy feeders; and for visual inspection of all animals.<br><br>The RSPCA recommends that pen space be doubled for all animals onboard vessels and housed in registered premises is required |
| **4.3.20** | The RSPCA do not support deferring compliance with the ammonia levels being maintained <25ppm [10]. The effects of ammonia on animal welfare are well known on both animals and humans. There are animal health and welfare issues for livestock housed in conditions where noxious gases are present. |
| **4.8.2** | Suggest that 12 hourly livestock checks are not sufficient, particularly in certain high-risk circumstances/conditions - e.g. disease concerns, high temperatures, unexpected events. These should be included to allow for 3-4 times daily checks as a minimum requirement. |
| **4.8.3** | Modify the standard to include the requirement for a post-mortem for animals that are euthanized or found dead to determine cause of death or illness. This information should be documented and reported on. |
| **AApl 05 Physical Infrastructure Standards (Feedlots, Depots, Abattoirs)** | |
| **5.2.1** | RSPCA recommends that the standard be expanded to better reflect Article 7.2.3 of WOAH, i.e., the following details should be included for ramps: Design of new loading and unloading facilities or modification of existing facilities should aim to minimise the potential for distractions that may cause approaching animals to stop, baulk or turn back.<br><br>Below are examples of common distractions that increase the welfare risk to the animal: |

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| | • reflections on shiny metal or wet floors – such flooring should be covered with sawdust (or the like) to reduce the risk of animals slipping, move a lamp or change lighting if reflections or harsh lighting causes shadows that interrupt approaching animals;<br>• dark entrances – illuminate with indirect lighting which does not shine directly into the eyes of approaching animals;<br>• animals seeing moving people or equipment up ahead – use solid sides on chutes and races or install shields;<br>• dead ends – avoid if possible by curving the passage, or make an illusory passage;<br>• chains or other loose objects hanging in chutes or on fences – remove them;<br>• uneven floors or a sudden drop in floor levels – avoid uneven floor surfaces or install a solid false floor to provide an illusion of a solid and continuous walking surface;<br>• sounds of air hissing from pneumatic equipment – install silencers or use hydraulic equipment or vent high pressure to the external environment using flexible hosing;<br>• clanging and banging of metal objects – install rubber stops on gates and other devices to reduce metal to metal contact;<br>• air currents from fans or air curtains blowing into the face of animals – redirect or reposition equipment. |
| **5.12.1** | RSPCA suggests that competence standards for animal handlers and managers of facilities must be required. This must include humane, low-stress handling of the animals as they move through facilities. Especially during loading and unloading of transport vehicles and vessels. |
| **AApl 06 Management of Breeding Livestock** | |
| **6.6.2** | As stated, Bos Taurus cattle are more susceptible to the risks of heat and humidity stress. Additional risk mitigation should be considered where heat stress may be a factor during certain times of the year, such as Livestock selection, acclimation, and use of the Heat Stress Risk Assessment (when required under AApl), etc. Due to decreased heat tolerance in Bos Taurus cattle, Bos Taurus must not be sourced for SEA small holder breeding programs. (Suggest stronger wording to be used here) |
| **6.6.3** | Cattle must be introduced to intensive feed rations gradually. RSPCA recommends feeding decreasing amounts of roughage and increasing amounts of grain for a 15–20 daytime period to provide cattle adequate time to adapt to diet. |
| **6.6.14** | RSPCA recommends that required vaccinations be specified individually and not proposed as options as the text implies. This is vital to protect animal welfare and mitigate biosecurity risks. Also need to specify time period and parameters for isolation from local flocks for bio-security, Animal Health Australia suggests a 10-day "cooling –off" period to monitor for disease and changes in introduced stock. |
| **6.7.2** | As noted, Merino sheep and other wooled sheep are more susceptible to the risks of heat and humidity stress. The RSPCA opposes the sourcing of Merino sheep for tropical environment small holder breeding<br>Programs, and recommends the use of the words "must not" to replace "should not". |

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| **6.7.6**<br>**6.7.14** | Suggest that required vaccinations be specified individually and not proposed as options as the text implies. Also need to specify time period and parameters for isolation from local flocks for bio-security - Animal Health Australia suggests a 10-day "cooling –off" period to monitor for disease and changes in introduced stock. |
| **6.7.16** | RSPCA recommends that required vaccinations be specified individually and not proposed as options as the text implies. This is vital to protect animal welfare and mitigate biosecurity risks. |

**General questions and Management standards**

1. How often will the standards be reviewed?
2. Will the management of AApl meet ISO standards? If so – which one(s)?
3. What occurs if a certified entity is found to have a non-conformance?
4. How are non-conformances graded?
5. What are the escalation procedures around repeated non-conformances or no appropriate action taken on reported non-conformances?
6. How will the standards be maintained in the event of government changes (e.g. ESCAS changes)?
7. What is the process for selecting appropriate certification bodies? Who will provide this service?
8. What qualifications/training and competency assessment will auditors have?
9. How will you handle complaints regarding the Standards, complaints of animal welfare etc?

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