

RSPCA Australia Submission

Review of standards around the Middle Eastern Summer live sheep trade

Thank for the opportunity to make this submission. Please note that in the interests of providing a succinct and rapid response we have not attempted to cover all issues, nor have we been able to present all the available scientific evidence. We have instead focused on summarising specific issues relevant to our previous discussion and provided attachments or links to where further information can be obtained.

Summary

This review provides an opportunity to address long-standing and significant issues with the treatment of sheep during long-haul live export voyages. There have been many previous reviews and recommendations in relation to the way in which live exports are conducted. When it comes to the long-haul sea transport of sheep, these reviews have successively failed to protect sheep from suffering and the risk of death because they have allowed the economics of the industry to override animal welfare requirements. This cannot continue. This review must not balk at proposing strong and significant change or it will fail as all previous reviews have.

The expectation of the Australian community is that this review will ensure that sheep no longer suffer on every voyage, and that there are no further heat stress incidents or significant mortalities on board live export vessels. This requires a fundamental shift in attitude and regulation, from one based on mortality or survival to one based on ensuring animal welfare.

In order to achieve that, three main things must change:

- 1. There must be a significant shift in the aim of current practice, from reducing the risk of death, to providing an environment and level of management that ensures sheep welfare, albeit at a mass commercial scale.**
- 2. Voyages during the May-October period must cease. The evidence is clear that regardless of any proposed changes to stocking density or other conditions, sheep will suffer and die during voyages in the May-October period.**
- 3. Sheep on board all voyages must have sufficient space to be able to easily access feed and water and lie down at the same time. In order to meet these basic requirements, current space allowance must be doubled.**

A number of further steps are also required to protect the welfare of sheep and ensure compliance with new regulations. These are set out in more detail below.

1. Stocking densities on board ship

We have already provided information (Attachments 1-3) explaining the allometric principles around how much space sheep need to (a) avoid consistent harm; and (b) meet basic (OIE) requirements to be able to easily access feed and water and adopt a normal lying posture at all times. We also point out that even with these increased space allowances animals will still be lying in their excreta with no bedding material or cleaning out of pens.

RSPCA Australia

ABN 99 668 654 249
ACN 163 614 668

P 02 6282 8300
F 02 6282 8311
E rspca@rspca.org.au
W rspca.org.au

PO Box 265
Deakin West ACT 2600



As previously explained, based on these principles (i.e. a k-value of 0.047), each 50kg sheep needs 0.621m² in order to be able to lie down and easily access feed and water: ASEL currently only provides 0.315m². In the way that current requirements are being worded (in terms of a % reduction in stocking density) this means they need nearly 100% more space, or to put it another way, each pen/vessel needs to load half the number of sheep.

Attachment 1 also provides some advice on what is sufficient when it comes to trough space - this also needs to be appropriately regulated.

These changes would also bring the ASEL more into line with the OIE requirements which state:

7.2.5. Planning the journey

7. Space allowance

b) Each animal should be able to assume its natural position for transport ... When animals lie down, there should be enough space for every animal to adopt a normal lying posture.

7.2.9. Travel

1. General considerations

d) Adequate access to suitable feed and water should be ensured for all animals in each pen.

That's why we are concerned that calculations based on reducing heat stress alone will still not be sufficient to ensure the welfare of sheep.

Key issue: Stocking densities on board ship must not only avoid consistent harm, but must ensure that all animals are able to easily access feed and water and adopt a normal lying posture at all times. Using allometric principles, this requires a k-value of 0.047. Thus a 50kg sheep requires twice as much space as ASEL currently requires in order to ensure their welfare for the duration of the live export journey (and to meet OIE requirements). This allowance is irrespective of the risk of heat stress.

2. Reportable mortality rates

The aim of setting reportable mortality rates should be to set a maximum level of mortality above which is regarded as unacceptable and which triggers an investigation. Prior to ASEL, Marine Orders Part set the reportable mortality level for all voyages. Before 1999 this was 3% for sheep: during the period 1981-99 the actual rate ranged between 1.33% and 2.36%. In 1999 the reportable level was reduced to 2% for sheep, 1% for short-haul cattle and 0.5% for long haul cattle. At that time, average mortality levels for sheep voyages were below 1.5%: they are now consistently tracking below 1%.

Despite this reduction in the average rate, there are still multiple sheep voyages every year where more than 1% of sheep die but where no investigation takes place (Figure 1). Thus there is no public record of what occurred or consideration of how to prevent the same issues from occurring. For reportable mortality rates to drive 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.

Investigations that are triggered by a reportable mortality rate should aim to determine what factors may have led to the high mortality level and to recommend strategies to reduce the risk of these factors from reoccurring. Mortality investigations should form part of a process of continuous improvement. There are a number of ways that such investigations could be

improved, including better record keeping and accessibility of records and better tracking of individual animals. Investigations triggered by one consignment should automatically include all consignments on the voyage to allow comparisons between consignments

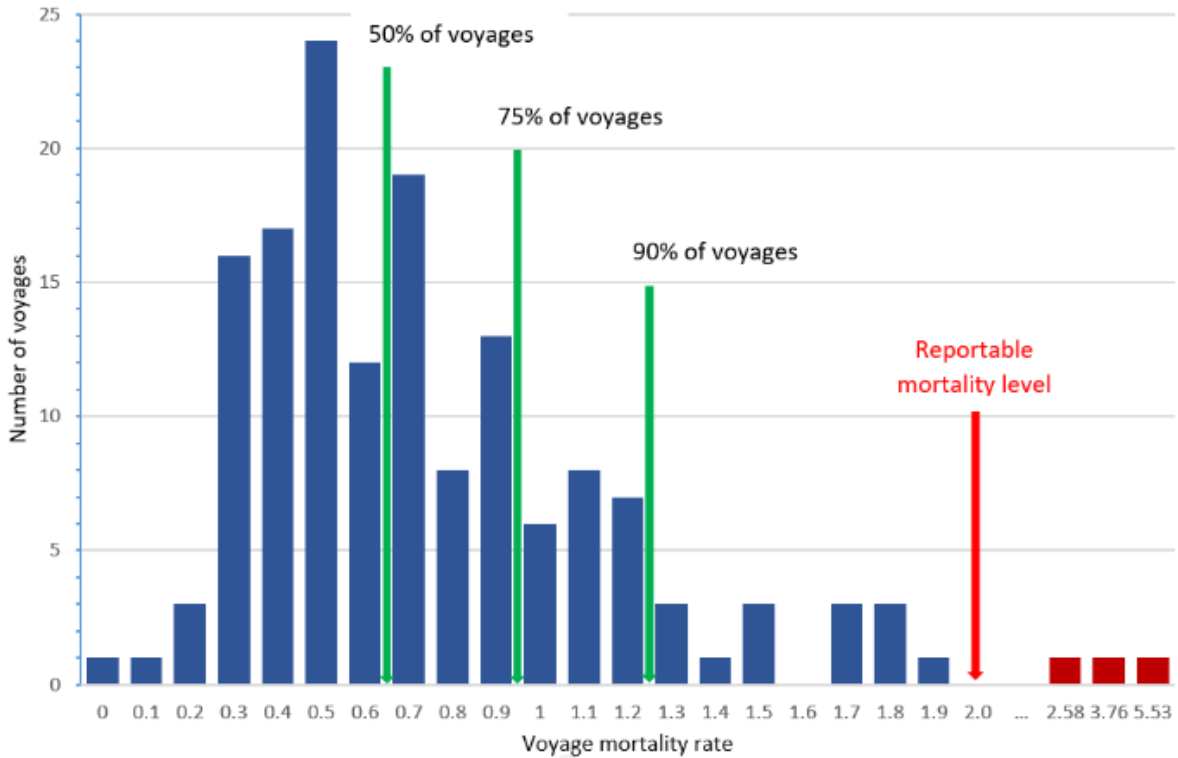


Figure 1 Reported mortality rates on long-haul sheep voyages 2013-17

Key issue: The reportable mortality rate should be immediately reduced to 1% for all sheep voyages with further reductions linked to the average mortality rate over time. A random audit of consignments with above-average mortality rates (but below 1%) should also be instigated to prevent adjusting of rates to avoid investigation.

Key issue: All sheep must be individually identified and traced through electronic tagging to ensure that numbers of sheep loaded and unloaded are accurate. This is essential to ensure compliance with standards relating to stocking density, mortality, health and welfare monitoring (and will facilitate traceability and compliance within ESCAS).

3. Heat stress

We have not attempted to summarise the available information on heat stress in this short submission, as we are aware that others (Animals Australia, Vets Against Live Exports, Australian Veterinary Association) have already provided this information via other submissions and discussions.

Key issue: It is absolutely clear from these submissions that changes to standards cannot remove the risk of suffering and death of sheep on voyages to the Middle East during the May-October period. The RSPCA cannot support any continuation of voyages during this period.

Outside of the May-October period, we support a number of significant changes to the heat stress risk assessment model (Hotstuff) for all voyages.

Heat stress threshold

We support the statements provided by Dr Sue Foster from VALE that the current DAWR heat stress threshold (HST) is not supported by current scientific and field data (Attachments 4-5).

Key issue: The HST for merino sheep must be urgently revised and lowered. The HST should be applicable to all animals on a voyage and be adequate for sheep that may already be stressed and/or diseased.

Risk assessment inputs

Risk assessment for heat stress must change from reducing risk based on mortality to one based on reducing risk of welfare impact. Specifically, the requirements of the model must aim to avoid the symptoms of heat stress rather than the risk of death from heat stress.

Information on vessel design, pen placement and previous voyage data must be included as inputs.

Risk factors related to the selection (property of origin etc) and preparation of sheep also need to be included.

Vessel loading plan

Requirements for loading plans must require vessels to be loaded in a way that all sheep benefit from lower stocking numbers, i.e. sheep must be dispersed evenly around the pens and decks during loading.

Key issue: The Hotstuff model must be reviewed in the light of current knowledge to expand the range of inputs and ensure that it is aimed at reducing welfare impacts rather than mortality.

4. Independence of Australian Accredited Veterinarians (AAVs)

It is abundantly clear that the current model where AAVs have to juggle two roles and have two 'masters' is untenable. It is not possible for an AAV to be employed by the export company and be beholden to the ship's master, at the same time as being required to act independently of their employer and report to DAWR on compliance with ASEL.

Every live export voyage should be required to have an appropriate number of veterinarians, stockpersons and veterinary equipment to properly manage, care for and treat every animal on board. This staffing level should reflect the need for sheep to be considered and treated as individuals in the same way as cattle, not as a group, in order to meet ASEL requirements.

To overcome the inherent conflict of the current system, in addition to the vet and stockpersons, each vessel must also carry an independent observer with appropriate animal welfare and auditing skills, to monitor and assess the welfare of animals and compliance with ASEL during the voyage. This person should be a vet or an otherwise qualified animal scientist with competencies in assessing animal welfare and auditing.

When it comes to monitoring the day-to-day outcomes during the voyage, DAWR must ensure that staff involved in receiving daily and end-of-voyage reports have the skills to be able to review these reports and act on information in them. In order to do this, it is advised that such staff have travelled on a vessel and have received appropriate training.

All existing AAVs should be required to undergo training to familiarise them with any changes to existing standards. Steps should also be taken to ensure that all new veterinarians are accompanied by an existing AAV when undertaking their first voyage.

Key issue: All voyages must include an independent observer with competencies in animal welfare and auditing in addition to the existing AAV. The independent observer must be selected and paid by the regulator (either directly or via a suitably qualified and independent third party arrangement). The AAV model needs to be reviewed to ensure that there is a requirement for vets on board (proportional to the number of animals) and that the regulator receives independent information and reports. Changes must also be made to current arrangements for AAVs and Stockpersons to ensure that sheep are managed as individuals. Training and support must be provided to all vets transitioning to new arrangements.

5. Compliance and enforcement of ASEL

The myriad problems with ASEL relate not only to the standards themselves, but the way in which they are regulated. Many of the changes needed to improve the welfare of exported sheep will rely on the regulator ensuring that every animal that walks onto a vessel meets the specifications for that specific voyage. The validity of any risk assessment relies on this.

To ensure this occurs, the specifications need to be clearly set out and approved prior to animals leaving the registered premises. This not possible under current arrangements at Fremantle where the individual inspection of sheep occurs at the wharf after leaving the registered premises.

Key issue: The recommendation of the 2013 Fremantle Inspection Review to require the individual inspection of sheep prior to loading for transport to the port should be immediately implemented.

Key issue: The on-board independent observer must be empowered to observe and audit loading to ensure that only sheep meeting specifications for that voyage are loaded.

6. Preconditioning/selection of sheep

Multiple factors have been identified for export sheep that influence their 'performance' during the export process. Historically 'performance' has meant whether sheep survive export or not, a mindset of thinking that we all seem to agree needs to be abandoned in favour of a welfare-based approach which acknowledges that avoidance of suffering means much more than survival.

Risk factors for sheep deaths in relation to on-farm selection and preparation have been known for many years and include geographical location, length of pasture and rainfall at farm of origin, mixing of sheep, previous dietary experience, handling facilities and procedures (Alliance Consulting 2001 - Attachment 6). The major cause of death during sheep voyages is salmonella/inanition and affected sheep are also at a higher risk of heat stress. [Significant investment](#) has been made in researching the feeding behaviour and intake of sheep during preparation in an effort to address inappetance (for examples see the body of work by [Anne Barnes](#) at Murdoch University). This indicates that after 5 days of exposure to pelleted diet only 95% of sheep are eating adequately. Yet, to date, this has failed to lead to any significant changes in sheep selection or management. Indeed the most recent paper by Anne Barnes' team indicates that it is still not possible to single out sheep at risk of inappetance prior to loading, thus stockman intervention remains the only means of management onboard ship

(Barnes et al 2018 - Attachment 7). Inanition is also exacerbated by high stocking densities and limited access to feed troughs.

It is not possible to screen out sheep at risk of inappetance prior to export, so the focus must be on reducing the likelihood of inappetance from occurring. This means better backgrounding of all sheep including on-farm preparation. This is incompatible with 'topping up' up with saleyard sheep to fill orders with no knowledge of their history or their risk.

Key issue: Standards must ensure that all sheep selected for live export are adequately backgrounded prior to leaving the farm. Saleyard sheep must be excluded from all consignments.

7. Port order in the Middle East

We understand that each Middle Eastern port has its own risk profile and that this is incorporated into the current version of Hotstuff. However, suggestions that rotating the first unloading port in the Gulf, and therefore not being fully loaded when arriving at more humid ports can mitigate risk, is at odds with available information.

An examination of [mortality investigation reports](#) shows that heat stress deaths can commence as soon as a ship approaches the equator all the way through to the Persia Gulf, when vessels are always fully loaded. Where Kuwait was the first port destination, the evidence shows deaths on ships rising prior to and then on arrival in Kuwait, and then continuing at high levels after stocking densities had reduced due to offloading in Kuwait. Other shipments where the first port of call was Oman, Bahrain, or Qatar also had high mortality spikes after the first port of unloading despite less sheep being onboard during this section of the voyage.

One of the most recent high death shipments illustrates this point. The Al Messilah, on which over 3,000 sheep died in July 2016, had rapidly escalating daily deaths upon entering the Persian Gulf, 3 days prior to docking in Qatar where the deaths continued. 854 sheep died just in the three days prior to arrival in Qatar - all occurring in the lower Persian Gulf.

Key issue: Deaths from heat stress cannot be avoided by manipulating the port of entry. The risk profile of each port should be considered as part of the voyage approval process and the regulator must be satisfied that the order of port visitation is consistent with the lowest possible risk to sheep welfare.

ENDS