

28 February 2019

Technical Reference Panel  
Review of the Heat Stress Risk Assessment Model

By email: [HRSAreview@agriculture.gov.au](mailto:HRSAreview@agriculture.gov.au)

Dear Panel members

### Heat Stress Risk Assessment Draft Report

Thank you for the opportunity to comment on the Draft Report. We would like to express our support for all eight recommendations made by the Reference Panel. It is refreshing to see recommendations relating to the live export trade that reflect the scientific evidence base and we commend the Panel for acting on this evidence.

We note that the current HSRA model is complex in terms of its inputs and assumptions, but only generates one outcome: minor adjustments to the minimum space allowance for animals on-board the vessel. In light of the recommendations made in the Draft Report, we expect the model will fundamentally change from one of simply adjusting on-board conditions, to one that determines whether or not a voyage should be permitted to occur.

We understand that industry associations will be making submissions to the review that may propose new approaches to dealing with heat stress. While innovation and new technologies to improve animal welfare are to be encouraged, we call on the Reference Panel to take a precautionary approach to considering any new proposals that seek to alter the recommendations made in the Draft Report. Animals have suffered enough through the trials and errors of the live export trade. The Australian community will not accept an approach that yet again places the welfare of animals at risk. A strict precautionary approach must be adopted to ensure that the scientific integrity of the Panel's recommendations remains intact.

Finally, we would like to again express our support for the proposed definitions of heat stress scores outlined in Table 1 of the Australian Veterinary Association's submission to the HSRA Issues Paper.

We look forward seeing the Panel's recommendations reflected in the final HSRA Review report and trust the Government will implement all recommendations in a timely fashion before the forthcoming Northern summer period.

Yours sincerely,



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