

8 October 2019

Interim Inspector-General of Live Animal Exports
Department of Agriculture
GPO Box 858
CANBERRA ACT 2601

Via: Have Your Say website

Dear Mr Carter

Submission to the Review of monitoring and reporting during livestock export voyages

Thank you for the opportunity to provide a submission to your review of monitoring and reporting during livestock export voyages.

As recent incidents in the live sheep trade have shown, animals remain incredibly vulnerable on-board live export vessels. The lack of effective on-board monitoring and reporting has allowed substandard conditions to persist in the live export trade far longer than they should have, and countless animals have suffered as a result.

Objective and timely data that are directly relevant to the animals' experience and state of welfare during export voyages are critical to improving welfare standards and reducing the frequency of catastrophic events.

Our submission is divided into three parts:

1. Voyage monitoring and reporting requirements;
2. Roles and responsibilities of on-board personnel; and
3. Departmental response, reporting and transparency.

We trust this information will be of assistance to your review. Please do not hesitate to contact me should you require further information or clarification.

Yours sincerely,



Dr Bidha Jones
Chief Executive Officer (A/g)
RSPCA Australia

RSPCA Australia Inc.
ABN 99 668 654 249

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

PO Box 265
Deakin West ACT 2600



1. Voyage monitoring and reporting requirements

Objective and timely animal based and environmental data that are directly relevant to the animals' experience and state of welfare during the voyage are critical to improving welfare standards and reducing the frequency of catastrophic events.

We support the recommendations made in the final report of the Australian Standards for the Export of Livestock Review (Final ASEL Review Report) to expand the daily report and end of voyage report. We also support the recommendations made by the Australian Veterinary Association to the extent they exceed and provide further detail on such reporting requirements. Daily reports should be required for all voyages regardless of the length of the voyage. Reporting should be pen-specific and possible to relate directly to the vessel loading plan.

Animal welfare indicators

Daily reports of animal welfare indicators and end of voyage reports must be mandated in the ASEL and provided for all voyages regardless of duration. We support the requirements for daily reports and end of journey reports outlined in Appendix A and Appendix B in the Final ASEL Review Report, the welfare indicators identified in [W.LIV.3032](#), and the recommendations made by the Australian Veterinary Association to the ASEL Review.

In addition to these reporting obligations, all voyages on which dairy heifers are consigned should include additional daily and end-of-voyage reporting on the number of animals observed to suffer udder enlargement, the leakage of milk or clinical mastitis (see [W.LIV.0280](#)).

Notifiable levels for individual indicators should be developed based on thresholds that represent good animal welfare, not on current outcomes which may be unacceptably poor. In particular, we believe it is necessary to expand the scope of notifiable incidents in line with the new Heat Stress Risk Assessment (HSRA) model. Voyages that exceed the revised HSRA output of 5 per cent of livestock experiencing heat stress, however defined, should trigger an investigation by the Department.

Systems must be developed to ensure the robust and objective monitoring of these animal welfare indicators. We have concerns about the potential for bias in sampling methods recommended in the Final ASEL Review Report. The recommendation to base welfare monitoring on an assessment of at least 1-2 pens of sheep, cattle, buffalo and goats representative of each class or line, per deck, as well as a welfare assessment for any 'at high risk pens' or 'pens of concern' raises the following questions:

- Who will make the decision as to which pens to assess as 'representative', and which pens enter the 'high risk' or 'concern' category?
- Where and when will the daily environmental recordings be taken? (These need to be representative of actual min and max readings across all decks and all high risk areas).

We recommend a procedure be established by the Department to ensure random and representative sampling is ensured and opportunities for selective bias reduced.

We support the installation and use of CCTV cameras on all vessels as an additional means of monitoring animal welfare indicators. CCTV should be observable from the bridge, kept for the entire voyage and the content made available to the regulator.

Environmental data

We support all the recommendations for environmental reporting made in the Final ASEL Review Report and in the Australian Veterinary Association's submissions to the ASEL Review. Notifiable levels for exceeding particular environmental indicators should be developed based on thresholds that represent good animal welfare, not on current outcomes which may be unacceptably poor.

We concur with the ASEL Review committee's view that the standards should include a new requirement that ammonia levels must not exceed 25ppm, and that ammonia reduction measures must be implemented if levels exceed or appear likely to exceed this level. We also share the view that recording of ammonia levels should be incorporated into the daily and end-of-voyage reports.

However we disagree with the suggestion that practical measurement of ammonia gas levels as a routine, regular measure is problematic. While there may be no automated means of measuring ammonia, there are handheld devices that can and should be used for animal and human welfare reasons to ensure that critical levels are not exceeded.

RSPCA on-farm assessors currently use a small handheld portable device (GasAlert Extreme NH₃, BW Technologies). It is designed as a personal alarm device for use when working in confined spaces. It measures NH₃ by diffusion in 1ppm increments. There are many such devices on the market, they typically range from \$600-\$800. They do require regular calibration (3-6 monthly) and sensor replacement (1-2 years). The cost of calibration is \$150-\$200 and a new sensor is \$400-\$500.

Ammonia tape is another option, if basic in nature. It costs around \$10 per roll (<https://www.microessentiallab.com/>) and is exceptionally portable, cheap and easy to use. Colour shades are green through darker green which means it determines ammonia levels in bands e.g. 0-10ppm, 10-20ppm, 20-30ppm etc. rather than a single figure e.g. 21ppm. As such it is most useful for indicating the presence of high ammonia levels.

There is at least one option used in the poultry industry for continuous monitoring (www.bigdutchmanusa.com/en/poultry-production/poultry-production/environmental/ammonia-sensor/).

We support the ASEL Review committee's suggestion that the Veterinary toolbox includes at least one handheld device capable of measuring Wet Bulb Temperatures (WBTs) and humidity. It should also include a similar device for measuring ammonia levels. All Australian Government Accredited Vets (AAVs) and Accredited Stockpersons should be trained in the use of these devices.

Temperature (dry and wet) and ammonia levels should be electronically data logged and fed to bridge and regulator in real time so that corrective action can be taken if threshold levels are exceeded. The data should also be archived for use should an investigation be required and to inform future R&D and standards review.

Mortality reporting

The aim of setting notifiable mortality rates should be to trigger the investigation of voyages that have unusually high levels of mortality. For notifiable mortality rates to drive continuous improvement they need to be linked to average 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.

Daily and end of voyage reports must clearly identify the number of animals euthanased (and the reason for euthanasia) and the number of animals that were found dead within the mortality reports.

We support including specific Average Daily Mortality (ADM) as a notifiable incident as recommended in the Final ASEL Review Report. The Department should carefully consider at what point consecutive ADM rates above the threshold level should trigger an investigation.

2. Roles and responsibilities of on-board personnel

On-board personnel have critical roles to play in ensuring the health and welfare of animals during the voyage and for fulfilling public reporting requirements under law.

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 (not as a group) in the same way as cattle in order to meet ASEL requirements. We support the proposal in the Final ASEL Review Report to relate the number of accredited stockpersons to the number of animals loaded, however the ratio recommended should be reduced to one accredited stockperson per 2,500 head of cattle and 10,000 head of sheep (instead of the recommended 3,000 & 30,000, respectively).

AAVs should be required to accompany all live export consignments regardless of the duration. Only AAVs are trained to actually diagnose a range of disease and prescribe appropriate treatment. There is always a risk that stockpersons may misdiagnose conditions and use inappropriate treatment.

We support the adoption of the role descriptions outlined in *Appendix A.1 Roles, responsibilities and competencies of livestock export supply chain operators* presented on pages 11-17 of the Draft AAWSEL Report which came out of the 2012 ASEL review process but with appropriate amendment of reporting responsibilities to reflect the addition of an independent auditor (discussed below).

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

Independent validation of on-board conditions and reporting accuracy is essential to ensuring public confidence in the regulatory framework. AAV's and stockpersons are placed in a position of conflict when they are required to report on matters that may negatively impact the interests of their employer. Substantial evidence of this conflict manifesting in the form of AAV's being pressured to edit voyage reports and being removed from the industry for critical reporting has been presented to past inquiries.

To overcome the inherent conflict of the current system, in addition to the AAVs and stockpersons, each vessel must also carry an independent auditor with appropriate animal welfare and auditing skills, to monitor and assess on-board conditions, 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. The independent auditor should have overall responsibility for reporting requirements to the Department with the assistance of the stockpersons and AAVs in the gathering of required data and information. The independent auditor must be selected and paid by the regulator (either directly or via a suitably qualified and independent third party arrangement) and should be required on all voyages regardless of duration.

3. Departmental response, reporting and transparency

It is essential that the reporting of on-board data is received, analysed, and acted upon by the regulator. Relevant Departmental officers must have the appropriate qualifications, skill set, experience, and training, including having actually travelled on a live export vessel, to interpret and appreciate the significance of the reported data.

We support the ASEL Review committee's view in the Final ASEL Review Report (at 5.2.4) that:

Ideally reports should include daily measures on animal welfare and morbidity and mortality data, including animal identification. This data, combined with an end of voyage report, should be analysed post-voyage with an epidemiological approach. The analysis should involve discussion with the AAV, an exporter representative and the department.

We note and support the need for a dedicated veterinary epidemiologist within the Department's Live Export Division to ensure that post-voyage data is adequately examined. A similar recommendation was also made in the Moss Review.

Investigations into notifiable incidents should aim to determine what factors may have led to the incident and to recommend strategies to reduce the risk of these factors from reoccurring. Investigations should provide recommendations for future journeys (not just for that specific vessel or exporter) and for improvements to standards. These investigations should form part of a process of continuous improvement rather than just proposing changes to the next similar voyage. Investigations triggered by one consignment should automatically include all consignments on the voyage to allow comparisons between consignments.

In addition to investigating 'high' mortality voyages and other notifiable incidents, 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.

Systems should be established to ensure that data from on-board reporting and investigations are fed into R&D and periodic standards review processes.

The Department must also ensure that R&D recommendations and outcomes are translated into regulated standards in a timely fashion. History has shown that suggestions and comments from R&D reports on the way things 'could' be done have zero effect in the live export trade unless they are translated into regulated standards.

Due to the extremely high level of public interest in live animal exports, the Department should aim to be as transparent as possible about voyage outcomes and its regulation of the trade. All voyage reports, including those of the Departmental Observers, should be publicly available (minus any personal information subject to privacy requirements).

If only summaries of Departmental Observer reports are to be published, the Department must ensure a consistent, objective, standardised system of summarising the reports and presenting the information including photographs and video footage. Reducing the scope for subjective interpretation and focusing on standardised objective data relating to animal welfare and environmental indicators like panting scores and deck Wet Bulb Temperatures is critical.

Footage of animal behaviour is an important tool for assessing an animal's state of health and welfare. The Department's ongoing refusal to release any footage obtained by the Departmental Observers leads to



lowering levels of confidence in the regulator and deepening suspicion about the nature of on-board conditions and levels of animal welfare. The Department should review this position and develop a system for publishing representative samples of the video footage as it does already with the photographs.