



20 December 2018

The Hon. David Littleproud MP
Minister for Agriculture and Water Resources
PO Box 6022
Parliament House
Canberra ACT 2600

Dear Minister

Your letter of 17 December 2018 and the Heat Stress Risk Assessment (HSRA) Technical Reference Panel's draft report demand an immediate response.

Animal Welfare is the highest priority area for our organisation. That is why ALEC, through LiveCorp, commissioned research in 2015 on the development of animal welfare indicators, including those directly associated with heat stress, and that work is ongoing. This work was commissioned following receipt of reports on improving industry's social licence in 2013 and 2014.

This work has included extensive literature and community research and has already moved to trialling. While the distressing events of the Awassi Express indicate that further work must be done, this has been an ongoing part of ALEC's business and assertions that the work is simply a reaction to industry incidents is inaccurate.

I emphasise that what this work has shown is that Heat Stress can be monitored and can be managed by industry – this is why we have supported a shift to animal welfare indicators rather than mortality.

Because of this ongoing research, ALEC is deeply concerned over the content of the HSRA Technical Reference Panel's draft report referenced in your letter. The draft recommendations contained in this report, if adopted, will result in the end of the live sheep trade, with the potential for severe contagion to cattle.

Effectively the draft recommendations in the HSRA report require no sheep to pant at score 3 or above, a score exhibited by sheep under certain conditions in Australia. The report also vastly lowers the targeted threshold from a mortality basis to one based on pant score. A normal response when a targeted threshold is lowered is to increase the risk setting (since the impact of not meeting the threshold is less severe – in this case, the risk involves avoiding animals panting at score 3 rather than unrecoverable event in both heat and duration).

However, the HSRA Technical Panel has not only substantially lowered the threshold but also the risk setting. The end result is a threshold / risk setting that is impossible to meet. The Panel seems to have ignored evidence, including from AAV reports, and those from Independent Observers, that for a large

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part of the year sheep on voyages to the Middle East suffer no overwhelming serious discomfort at wet bulb temperatures of 28 degrees.

A closure of the sheep trade, as a result of the Panel's report, will have an enormous impact on producers, particularly those in Western Australia, a source of extreme concern to ALEC. Of equal concern is that new animal welfare benchmarks in the report, which are unprecedented globally in terms of their requirements, will have implications over time for domestic sheep production practices and management of both heat stress and cold stress – standards cannot be introduced in one section of the supply chain without implications for all sections when root causes are the same.

One of the Guiding Principles of the HSRA Technical Panel was to “be cognisant of the government's policy that supports a sustainable livestock export trade”. We submit that the draft recommendations render the trade unsustainable. We note that the subject of heat stress risk is extremely complex, with the current HSRA model being developed from the combined expertise of animal behaviour and welfare experts, engineers, statisticians, regulators and practitioners. We note that the Technical Reference Panel only contains animal welfare expertise (and a representative from AMSA) and one of the Panel members is closely associated with groups opposed to the trade.

Your letter states that “little investment has been made by industry voluntarily and any investment in research that is underway has occurred only after yet another live export animal welfare crisis, being the Awassi Express incident earlier this year”. This statement is inaccurate.

Since 2013, the industry has invested heavily in animal welfare research, as well as training for industry participants both domestically and in-market, technologies that improve animal welfare, investment in new vessels and enhanced infrastructure on vessels. This will be further detailed in Livecorp's response to you.

This work has continued over the last few years, including initiatives directly associated with the 2013 report referred to in your letter. Amongst other things these initiatives have involved:

- Development of a set of animal welfare indicators, including technology to collect these indicators. After an extensive literature review and community research, collection of these indicators is now being trialled.
- Progressing with the development of LGAP with establishment of a structure within which it could operate, engagement of an independent board and appointment of a CEO.
- A mandatory code of conduct applicable to all ALEC members with severe penalties including suspension of the code is breached.
- Development and endorsement by ALEC of an Ethics Committee, independent of the ALEC Board.
- Support for an Inspector General for live Animal Exports.
- Imposing a voluntary moratorium on live sheep shipments to the Middle East between June and August at the height of the northern hemisphere summer.



- Imposing a voluntary pause in shipments of slaughter livestock to Malaysia during Korban in 2018.

Since you were appointed Minister for Agriculture and Water Resources, apart from one heated exchange, you have resisted my many attempts to engage with you, both on progress and the way forward. Now in the interest of securing the viability of the trade, I am pleased that you have finally agreed to meet and discuss our reset and the way forward.

In the light of the HSRA report we will not only be responding to it but also make a supplementary submission to the ASEL review

Yours Sincerely

Hon Simon Crean
Chairman
Australian Livestock Exporters' Council

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