



James Jackson
President

Ref: 181920C

4 March 2019

Technical Reference Panel – HSRA Review
Department of Agriculture and Water Resources
GPO Box 858
CANBERRA CITY ACT 2601

Dear Panel,

RE: Feedback on the Recommendations of the Heat Stress Risk Assessment (HSRA) Review

NSW Farmers' Association welcomes the opportunity to provide feedback on the recommendations made in the Draft Report by the Independent Heat Stress Risk Assessment (HSRA) Technical Reference Panel (The Panel). Our contribution to this stage of the review builds on our submission made in October that provided commentary on the Panel's HSRA Issues Paper.

NSW Farmers is Australia's largest state farming organisation, representing the interests of over 8,000 farmer members from across the state. Our members strongly support the continuation of a sustainable live export industry, which simultaneously demonstrates high standards of animal welfare while being financially viable. Recent industry-led developments such as the Australian Live Exporters' Council's (ALEC's) decision to impose a three-month live-export moratorium during the Northern Hemisphere summer, demonstrate that the industry is dedicated to an agenda of reform and improving animal welfare outcomes. These industry led initiatives only strengthen Australia's position as a global leader in animal welfare within the live export industry.

Countries in the Middle-East have stated that they will continue to use the live export trade, whether Australia remains an active participant or not. If impractical regulations are imposed on the Australian live export industry then the trade will cease, as it will become unviable for exporters. This will see alternate countries replace Australia, who do not necessarily share our commitment to high animal welfare standards, potentially resulting in poorer welfare outcomes globally.

NSW Farmers is committed to the live export industry continually improving, in a measured and practical way. To ensure that optimal animal welfare outcomes are achieved within the industry it is essential that any regulatory changes are underpinned by robust, peer-reviewed scientific evidence. The implementation of any reform prior to sufficient review will have devastating impacts on animal welfare outcomes.

NSW Farmers has a number of concerns with the Draft Report recommendations, particularly the evidence used to underpin them. It is clear that not all the evidence has been thoroughly reviewed, as apparent by the failure to corroborate HSRA model outputs from controlled animal experiments with information from on-board operational live export vessels. This lack of sufficient rigour in the information used to underpin the recommendations is highly troubling and further work is required.

The Association has provided a response to specific recommendations of particular concerns. Our response has been prepared with input from Sheep Producers Australia (SPA) and other industry

NSW Farmers' Association

ABN 31 000 004 651 PO Box 459 St Leonards NSW 1590 Level 4 154 Pacific Hwy St Leonards NSW 2065
Member Service Centre 1300 794 000 T 02 9478 1000 F 02 8282 4500 www.nswfarmers.org.au

groups, with specific emphasis placed on the findings of the industry-established Technical Advisory Group (TAG).

Please find our detailed response below:

- HSRA Model Based on Animal Welfare

NSW Farmers supports the live export industry adopting a HSRA that is focused on animal welfare rather than mortality. However animal welfare is a complex concept and the proposed indicators must be founded in clear and accurate scientific data, making it a long term ambition. Unfortunately such a reform is not currently possible in the short-term.

Australian Livestock Export Corporation Limited (LiveCorp), the Research and Development Corporation (RDC) for the live export industry, is currently undertaking a project examining on-board welfare indicators that are multi-faceted, reliable, and easily measured and monitored. This LiveCorp project will be completed by 2021, and any attempt to implement animal welfare indicators prior to its completion may be incomplete and without the required scientific rigour. The premature adoption would force the live export industry to use underdeveloped and ineffective indicators, risking animal welfare outcomes.

The Panel must refrain from implementing any animal welfare indicators in the immediate term. These indicators can only be endorsed once they have been rigorously peer-reviewed and subject to a clinical trials on-board live export vessels in operation. This process may take a number of years.

Recommendation 5 outlines the need for the HSRA model to be constantly refined, especially in relation to diurnal temperature differences. While the Association agree that the HSRA should continually be updated as improved information becomes available, we oppose any model that does not consider diurnal temperature variances as it is such an important component of determining heat stress. Therefore, we do not support the HSRA model as proposed in the Draft Report

- Establishing an On Board Heat Threshold of 28°C Wet-Bulb Temperature (WBT)

NSW Farmers supports the use of a heat threshold, as one of many different animal welfare indicators that should be used to measure on-board welfare. However a heat threshold must never be the sole animal welfare indicator for live export voyages.

The recommendation to set the heat threshold at a Wet-Bulb Temperature (WBT) of 28°C poses a number of issues. Firstly, it fails to recognise that a number of important variables impact livestock's heat stress threshold such as diet, diurnal temperatures and wool length. Secondly, the Draft Report did not outline how the threshold would operate, specifically how it would be measured and monitored. Thirdly, the 28°C WBT heat threshold threatens the viability of the industry.

The Draft Report did not consider diurnal temperature variations and the ability of sheep to shed their heat load in cooler evening temperatures. This omission is significant as it is a fundamental contributor to reduced heat stress in livestock. It is known that heat stress is the result of experiencing high temperatures over a long period; short-term exposure to high temperatures does not necessarily result in heat stress. By not accounting for the ability of sheep to lose heat overnight the 28°C WBT heat threshold recommendation is misleading.

Furthermore there is no clear information on how the heat threshold will be measured, monitored and applied. It is not clear whether the WBT will be calculated by an equation or based on atmospheric temperature and relative humidity or by another method. The lack of clarity extends to how the

NSW Farmers' Association

threshold will be applied. The Draft Report does not explain whether the threshold is an absolute figure, never to be exceeded, or not. The ambiguity of the Draft Report on this essential issue makes it difficult to provide sufficient comment and is causing angst amongst industry participants. We request that the Panel, as a matter of urgency, provide further clarification on the operational details of the threshold's application.

The proposed 28°C WBT heat threshold threatens the economic viability of the live export trade. The implementation of the threshold would reduce the trade to 5 months a year, between November and March. Reducing the timeframe that the trade can operate would affect exporter's profitability, as it would not be possible to supply the current markets their desired volumes. This would result in many exporters leaving the industry, leaving millions of Australian sheep stranded without a market and potentially leading to a domestic animal welfare disaster, similar to that experienced in the Northern Territory in 2011.

NSW Farmers recommend that the Panel must set the WBT heat threshold at a far higher, more sustainable figure. The Panel should work with industry and utilise data from Independent Observer reports that indicates that animals can comfortably cope with temperatures above 28°C.

- Reduced Stocking Densities

NSW Farmers' supports stocking densities that promote quality animal welfare outcomes, based on scientific evidence.

The Association is concerned that the proposed stocking densities in last year's Australian Standards for the Export of Livestock (ASEL) Review, are overly prescriptive and the proposed requirements are not founded in clear scientific evidence. The densities must be scaleable, to allow for advancements in technology and vessel design to be recognised. The requirements in ASEL must be amended to reflect outcomes based on scientific evidence and to permit higher stocking rates, if innovations are developed.

- Welfare Beyond the Journey

Australia is a leader in animal welfare in the global live export industry as the only country that demands welfare is monitored and protected through the whole supply chain. Practically, subjecting our key markets to adopt recommendations relating to environmental conditions outlined in the Draft Report is un-workable. The key markets for our live exported sheep are Middle Eastern countries which can experience high temperatures at times. It is unlikely, that these countries would accept these recommendations given their climate realities. Therefore, it is likely that they would cease sourcing Australian sheep if the recommendations of the Draft Report were imposed on them.

We suggest that the Panel don't extend the recommendations in this report to our trading partners. It could have a detrimental effect on our trading relationship with these countries, across all commodities and exports.

- Interim Regulations

Under no circumstances does the Association support the implementation of interim regulations while the HRSA Review is being finalised. As stated above, the Association have a number of concerns with the recommendations in the Draft Report. The implementation of any interim measures based on the Draft Report would be poor governance and raise questions over the integrity of the review process.

NSW Farmers' Association

The Association appreciates the opportunity to comment on the HSRA Review and reinforce that any reforms must be based on clear scientific evidence to ensure that good animal welfare outcomes are achieved and a sustainable trade exists.

If you would like further information please contact Annabel Johnson, NSW Farmers Livestock Policy Director on (02) 9478 1035.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James Jackson', written in a cursive style.

James Jackson
PRESIDENT