



Middle East sheep exports policy options discussion paper

Submission by a group of Australian Government Accredited Veterinarians

The following group of Australian Government Accredited Veterinarian (AAVs) have prepared this submission for the Department of Agriculture to examine the policy options put forward for future Middle East sheep exports by sea.

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The review documents to help with this submission can be found at:
<https://haveyoursay.agriculture.gov.au/middle-east-sheep-exports>

It should be noted that AAVs are not necessarily represented by the Australian Veterinary Association's (AVA) policy position and submissions on livestock exports. The AVA represents its members from the wider veterinary community, not all veterinarians working in the livestock export industry are AVA members. This submission has been formulated with the aim to represent the opinions of veterinarians who are currently employed in the livestock export industry and have a thorough working knowledge of the industry.

Definitions

- **AAV:** refers to Australian government Accredited Veterinarians
- **AEP:** Approved export program
- **APAV:** Accreditation Program for Australian Veterinarians
- **AVA:** Australian Veterinary Association
- **Class:** the purpose the animal is being exported (Breeder, Feeder, Slaughter)
- **DoA:** Department of Agriculture may also be referred to as “the department”
- **Industry:** refers to the livestock export industry as a whole
- **IO:** Independent Observers
- **Type:** a characteristic that can define a group of animals (Breed, Sex, etc)

Introduction

As Australian Government Accredited Veterinarians (AAVs) we welcome the opportunity to provide information to the Department of Agriculture to help their Regulatory Impact Statement process on regulating sheep exports by sea to the Middle East.

AAVs are best placed to review operational effectiveness and practical application of policy. AAVs have a unique skills bases, and a thorough understanding of the structure of international trade and how this relates to Australia's animal health system. Their professional qualifications and experience are supported by additional training through the APAV and AAV programs. AAVs are regulated by both State/Territory and Federal legislation, their professional standing dictates that animal welfare is of paramount concern. AAVs are in a unique position to provide reporting around whether proposed or implemented changes are effective in improving animal health or welfare throughout the livestock export supply chain.

Previous submissions made by this group of Australian Government Approved Veterinarians that may provide additional context to the position detailed in this document include:

- Heat Stress Risk Assessment review for export of sheep to the Middle East during Northern Hemisphere summer (submitted October 2018)
- Export of Sheep to Middle East in September 2019 (submitted July 2019)

The following document provides opinions and thoughts of the AAVs and veterinarians listed. Each section is not a full representation of each submitting contributor. Where vastly differing opinions were received, they are listed. The document is not exhaustive of all AAVs and this group recommends the department engages directly with AAVs as a key stakeholder group.

Methodology

This submission was developed through input from AAVs and other veterinarians associated with the livestock export industry.

An email was sent to all currently registered AAVs asking for their input into the working draft document through a google survey. A follow up email was sent to all registered AAVs reminding them that their input was required. Google docs was used to create the submission as multiple people can edit, comment, or view the document simultaneously. Contributions, either through written or verbal communications, have been included in the submission. If there were vastly different opinions these were listed under the relevant questions. A scientific approach, supported by individual experiences, where appropriate, has been taken.

AAVs are constrained by work commitments and as a group has not had the resources to review all scientific literature (both peer review and grey) to identify appropriate references.

Relevant scientific references to research may be found in the Livecorp and ALEC submissions.

AAV position

The AAV WG proposes a combination of Options 1 & 2. This would involve a three month moratorium at the highest risk time of year and the removal of the requirement for a HSRA for the other 9 months of the year. Removing the HSRA is suggested because HotStuff version 4 is unlikely to require greater pen space allowances than the revised stocking densities under the Middle East Order.

In future, the collection of standardised welfare indicators data and a revised HSRA model, will make Option 3 the most favourable regulatory position. This option will become viable when the industry has access to better data collection techniques, improved regulatory capacity on the basis of these data, and more sophisticated methods of ensuring that livestock are not subject to extremes of environment at any stage of the supply chain. Ideally, Option 3 should become applicable for 12 months of the year, for all livestock export markets. This means that significant efforts need to be made by industry and the regulator to work towards making Option 3 viable in the near future. We recommend prioritising the standardisation of data collection and continuing to improve technologies and infrastructure on-board vessels and in pre-export facilities and receival feedlots.

Impacts of regulatory change on AAVs

Australian Accredited Veterinarians have been significantly impacted financially, professionally and personally, by the changes in regulation over the last twelve months.

Significance of options presented

All options necessitate alternative activities to support a livelihood, however, Option 1 would have the least impact on AAVs. It is almost impossible to quantify the financial and personal impacts because changes in regulation appear incomplete.

How the regulatory environment in the last 18 months has affected AAV businesses

AAVs whose workload is focused on sheep exports have reported the need to transition away from their primary business focus being on AAV activities. The provision of other veterinary activities and services have taken a higher priority due to uncertainty around trade. It is widely understood that this uncertainty and unpredictability has had a similar impact on everybody supplying or servicing live sheep exports.

AAVs servicing sheep exports have reported a 30% loss of income over the last 18 months for land-based activities and 20% -50% loss of income for shipboard AAVs.

Regulatory changes in the last 18 months has affected the AAVs' ability to secure professional indemnity insurance

Since the Awassi media exposé and the proposed conflict of interest discussions raised under the Moss Review, numerous insurance companies have stated they will no longer provide professional indemnity insurance for AAV activities on the basis that their underwriters will not cover them. The reasoning for this shift in position from the underwriters has not been made clear. It is difficult to comprehend that this decision has been made on the basis of probability and risk as there has not been a claim made to date. This is a significant concern for AAVs, many of whom are now face with the possibility of working without professional indemnity insurance or deciding to no longer operate as an AAV.

Regulatory changes in the last 18 months and personal challenges for AAVs

AAVs are predominantly employed under a fee for service arrangement, the shifting regulatory environment over the last 18 months has resulted in significant impacts on the ability to earn an income. The lack of security has also had an enormous personal impact on the affected AAVs.

This has been exacerbated by changes in policy made with little warning (such as an extension of the moratorium in September). However, over the last 18 months, there has been a shift in industry culture and changes such as the moratorium during the northern summer and greater space allowances on vessels have been made. This has created an environment with significantly reduced risk of poor welfare outcomes, from a personal rather than business perspective, these improvements have created a more satisfying workplace.

Independent Observers effect on AAV role

The IO's constitute a disparate group of people from varying backgrounds, experience, professional capacities and levels of commitment, they have diverse opinions and a poorly defined agenda. This causes uncertainty regarding their expectations and a need to be responsive to the individual context created by their presence. There is a common perception amongst AAVs that IOs have been placed on board vessels because the AAV role is not trusted.

The perception of AAVs within the community and veterinary profession

The perceived need to have an Independent Observer looking over our shoulder is a clear indication that AAVs are not trusted to deliver sound professional services and information to the Department. The ministerial decision to have IOs on all voyages was outside of the Department control, however, it was driven by a lack of Departmental understanding around the operational reality on livestock vessels. The recent amendments to reduce IOs and develop a deployment policy is sensible. AAVs welcome further consultation on the best model to ensure presence on voyages that require the services of a veterinary health professional.

Appendix 1: Departmental policy options

The AAV response to each of the four policy options presented by the department are:

Option 1

Three month prohibition - conditions under the Middle East Order apply for the northern summer months and industry continue to use the existing HSRA model or agreed animal welfare indicators.

AAV Response:

This option is viable as the three months of highest risk are excluded and it allows 9 months of trade based on improved consignment risk assessments. It has the capacity for better veterinary involvement in voyage preparation and risk mitigation. This option gives a higher level of security and certainty to producers. It facilitates making on-farm decisions to sell stock to export markets close to the mid-May break in the season, or to retain stock over the three month moratorium if the seasonal feed availability allows. It is commercially important for the sheep and export industries to have access to the live export market as early in September as welfare allows. This provides flexibility of marketing sheep prior to the finish of the growing season. This is becoming increasingly important with climate change and the resulting unpredictability of weather patterns. This aspect has significant potential welfare implications. It is also critical for those servicing the industry to have no longer hiatus than welfare dictates. There has already been an exodus of skilled personnel and service providers. Exporters take on greater risk under this option because each consignment must be approved on a case by case basis, however, it also allows for risk assessments to be conducted on each voyage by departure and destination ports, and on the basis of livestock preparation and individual vessel performance.

Animal welfare indicators can be introduced; however, they are still currently being developed and tested, they cannot be used as the primary basis of risk assessments at this stage. In future, the implementation of welfare indicators will result in the collection of standardised data assessing health, behaviour and mortality outcomes. It is not only the collection of data but what and how we react to data that is important. When welfare indicator data have been collected over all voyages for a period of time, industry can benchmark voyage performance and guide future decision making (see requirements for data collection under Option 3). The use of automated data (WBT) logging equipment on board vessels for all voyages is recommended. The collection of animal-based welfare indicators can then be compared to accurate climatic data, facilitating the relationship between environmental conditions and welfare outcomes to be extrapolated.

There are currently several MLA/Livecorp funded research projects in progress and as these are reported there will probably be better regulatory options to support. The support for Option 1 should be reviewed every 6 months as research projects report.

Option 2

Apply the 2019 prohibition period—Conditions under the Middle East Order apply for the northern summer months. The department would remove the requirement for a HSRA on live sheep export voyages to, or through, the Middle East.

AAV Response:

The AAV response stands by its previous submission regarding the 2019 prohibition period. However, AAVs support the removal of the HSRA at times of the year not covered by an industry moratorium. The revised stocking densities based on allometric calculations put forward by the ASEL update supersedes the stocking density allowances based on HSRAs. HotStuff version 4 is unlikely to require greater pen space allowances than the revised stocking densities under the Middle East Order.

It is important to consider the implications that alternative trade practices will have on the timing of ships returning to Australia. With a moratorium in place June-August, ships will travel to alternative countries and consequently undergo comprehensive pre-loading assessment on their return to Australia. This may impact the timing of voyages leaving Australia following the moratorium.

We must also consider the variations in risk for different markets and destination ports, it is known that the time of year that risk markedly decreases can vary for different destinations. Further to this, AAVs recommend the consideration of improved welfare reporting in market. It is important to consider animal welfare for the whole of the supply chain. It would be beneficial to gain a better understanding of the adaptive capacity of sheep to ME conditions on arrival in different destination markets.

As previously stated by AAV consensus:

“The prohibition of sheep exports to the Middle East by sea through the month of September is not an appropriate option. This does not take into account historical evidence of successful voyages of sheep cargoes and the critical data presented to support this [regulatory changes were] oversimplified. Extending the industry initiated moratorium period [of three months], which was put in place by exporters as a collaborative risk mitigation strategy, [serves] to negatively impact market reliability and access to trade with the Middle East.

This option does not consider the significant shift in industry culture that has occurred over the last twelve months. Improvements in animal welfare outcomes have been achieved primarily through reductions in stocking densities as enforced prior to the voluntary moratorium, but there has also been a concerted industry effort to mitigate risk in all areas of the supply chain. Actions such as improved producer engagement with industry, more stringent sourcing and on farm selection of livestock, stricter procedures for preparation, drafting and shearing in pre-export facilities, changing company standards to increase minimum quarantine periods, the transport of livestock predominantly from Western Australian ports (acclimatisation zone 3 and reduced sea transport times), should not be overlooked. The impacts of these industry initiatives, and the

improved communication and feedback structures between all levels of the supply chain is evident in our workplaces and has been reflected by recent voyage outcomes.”

“AAVs feel that the adoption of this regulatory option as a blanket rule is too conservative and does not reflect the actual level of risk demonstrated by current industry practices.”

Option 3

Adopt a revised HSRA model with risk settings based on heat stress thresholds or agreed animal welfare indicators.

AAV Response:

Regulation of the industry through the northern hemisphere summer months using a revised HSRA based on heat stress thresholds is currently not viable because -

- Heat stress thresholds are not an appropriate way of assessing cumulative heat loading and the risk of developing heat stress risk in an industry environment. We propose that a welfare threshold based on a single wet bulb temperature value is unrealistic. The risk of heat stress is not simply dependent on animal factors and a WBT threshold. It is imperative that periods of exposure to high WBT's, and periods of respite allowing animals to shed heat load, are accounted for when assessing heat stress risk. The current HSRA model does not account for exposure time and respite periods.

Regulation of the industry through the northern hemisphere summer months using a revised HSRA based on animal welfare indicator data is not currently a viable option. To regulate on the basis of animal welfare indicators we must:

- Define the indicators that give us the most informative feedback - what do we measure? This is currently not possible as the types of indicators (particularly regarding appropriate behaviours and good welfare outcomes) are still under development.
- Elevated panting scores can indicate an animal's need to shed body heat at that point in time. To truly understand the welfare implications of elevated panting scores we must also consider the impact that the heat challenge is having on the animal's normal behaviours and health outcomes.
- Standardise the measurement technique for each criterion through provision of training for auditors/observers, then validate the interobserver reliability between auditors/observers. This is specifically important to ensure that measurements yield consistent results between different auditors/ observers. Protocols for ongoing assessment of interobserver reliability is also recommended (periodical auditing of auditors).
- Develop a sampling protocol for timing and frequency of assessments - some indicators will change daily, while others will change over the course of a 24 hour period (esp panting scores). Therefore, how frequently do we make our observations in order to understand appropriate behavioural patterns and heat loading and respite periods?
- Take a representative sample of animals. Deck and pen areas differ environmentally on-board export vessels. E.g. if we take an average panting score from all animals, we miss individual variations in scores, and miss the upper and lower scores in different areas of

the ship. Recording the percentages of animals at each panting score, and in areas of the ship that vary in environmental conditions is more informative.

- Define acceptable limits. Welfare indicators need to work from a benchmark of data collected over multiple voyages to understand the parameters of normal welfare outcomes. Specifically, when do normal animal responses to environmental challenge become unacceptable welfare outcomes? This is yet to be quantified, and the data have not yet been captured for the baseline of welfare outcomes to be established, therefore, setting critical levels is not yet possible.
- The current welfare indicators project has been contracted to design a tool to be used by exporters and industry to judge their own performance against industry benchmarks. It is designed for industry workers to be using the tool to self assess. It has not been contracted to provide a tool for regulating trade.
- The LiveEx Collect project has been working alongside the welfare indicators project. LiveEx Collect is providing a platform that incorporates some animal welfare indicators derived from the welfare indicators project, however, these indicators have not yet been validated. The LiveEx Collect platform is designed to facilitate the collection of standardised data, provide necessary information to meet reporting requirements and to be used as a self-assessment tool.
- If the welfare indicators information collected through LiveEx Collect is going to be used as a regulatory tool, it will need to be recorded by an appropriately trained auditor (possibly the shipboard AAV) or a skilled IO.
- It is currently possible to use welfare indicators to report on animal outcomes but not yet for predicting and mitigating risk.

The HSRA model must be revised based on industry applicable heat stress data, specifically, data that considers heat load accumulation and respite periods rather than WBT thresholds for a single point in time. This must be considered in conjunction with animal outcomes in an industry setting (i.e. animal welfare indicators data). This option would then allow risk assessments and regulatory decision making to be made on the basis of relevant and recent data. We can determine the actual risk rather than regulating on the basis of perceived risk, opinion or by extrapolating from scientific data that is not specific to the livestock export industry.

It is also worthwhile considering other methodology and husbandry procedures (aside from stocking density) that have a significant impact on welfare outcomes during sea voyages. Consideration for improvements in ventilation dynamics are imperative, techniques to improve the direction of air flow (or the possible dehumidification of air) must also be applied to the risk assessment framework if they are utilised on vessels. Improved feeding techniques can also reduce the latent heat produced by animals when travelling through 10° South and 10° North, the Straits of Hormuz and the Gulf of Aden. Trailing the use of adjuncts to heat stress management such as electrolyte supplementation, betaine, glucagon and ionophore inclusions may also improve our heat stress management capabilities. Therefore, a revised HSRA should compile information not only on temperature and stocking density, but also accumulated heat load index information for sheep of different categories, ventilation dynamics, and nutritional management.

In summation, although Option 3 is the best regulatory position, we feel that it is not currently viable. It may be a viable option in the future if improved scientific data become available regarding heat load accumulation, respite periods, and the impact of exposure times at incremental WBTs. When we are able to map objective measures of welfare against current and prior environmental conditions, this option will be preferred. The use of animal welfare indicators in an industry setting

is under development, but is currently not suitable for use as a regulatory tool (McCarthy Review 2018 Section 6.6.11).

Option 4

No prohibition—live sheep exports to, or through the Middle East would be permitted 12 months of the year. Conditions under the Middle East Order apply for the northern summer months and industry continue to use the existing HSRA model.

AAV Response:

This option becomes viable only if the science/technology, data collection and analysis, and regulatory capacity becomes available to support Option 3.