



National Animal Welfare Advisory Committee

Animal Welfare Policy
Ministry for Primary Industries
PO Box 2526 Wellington
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cc: Minister of Agriculture

22 January 2020

Submission on: Review of livestock exports

Introduction

1. The National Animal Welfare Advisory Committee (NAWAC) welcomes the opportunity to make a submission on the review of live export rules.
2. NAWAC is an independent statutory committee established under the Animal Welfare Act 1999 to advise the Minister of Agriculture on animal welfare matters. Its functions include recommending codes of welfare for issue and making recommendations on legislative proposals including regulations.
3. NAWAC acknowledges that economic and trade considerations are central to the live animal exports issue. However, as the committee was established to provide animal welfare advice, this submission will focus only on the animal welfare risks and benefits presented by each option in MPI's discussion document.
4. At present, NAWAC considers that the only way to fully protect animal welfare during and after livestock export is to implement option one: a total ban.
5. NAWAC may be able to support a conditional prohibition or further regulations under certain circumstances, described below.
6. NAWAC has concerns over the limited scope of the live export review in terms of species covered. While the review focuses on the export of cattle, deer, goats and sheep, we note that thousands of horses, millions of day-old chicks, and large numbers of live aquatic animals such as crustaceans and eels are also exported from New Zealand each year. NAWAC understands that the majority of the aquatic animals are exported for slaughter.
7. Although NAWAC acknowledges that animals other than livestock are covered by different processes and are not considered in the current review, the Committee notes that the Animal Welfare Act 1999 does not differentiate between species and states that all the species listed above are sentient. Therefore NAWAC submits that the same animal welfare considerations we present here must also be considered for all animals exported live from New Zealand.

Option one: a total ban on livestock export

1. Having received advice from the Ministry for Primary Industries on the current live animal export controls, NAWAC concludes that it is difficult to obtain information on the animals' welfare either during the journey or in the importing country after export where New Zealand has no jurisdiction, especially beyond the 30 day post-arrival reporting period. NAWAC therefore considers that the current controls on the export of livestock cannot adequately protect the welfare of animals.
2. NAWAC has major concerns around the welfare of animals after they arrive at their destination. Problems will inevitably arise where animals are sent to a destination to which they are not physiologically and/or behaviourally adapted, or where they are not cared for in the same way that would be expected in New Zealand. For example, it would be difficult for cattle, raised on pasture in New Zealand's temperate climate, to adjust to a tropical environment and the use of tie-stalls. Even where those in charge of the animals have the best intentions and receive ongoing support from New Zealand, fundamental differences in animal genetics, climate, farming systems, disease, parasite risk, and feed, will predispose towards significant animal welfare risks when sending our livestock overseas.
3. A further concern is around the information collected by MPI during transport. We acknowledge that statistics such as mortality and significant animal health events (e.g. disease, severe injury, abortions) are gathered and reported to MPI. However, NAWAC considers that good animal welfare is about much more than simply avoiding mortality and significant health events. The understanding that animals are sentient, that they can have emotions, feelings, perceptions and experiences that matter to them, is integral to NAWAC's work. NAWAC therefore considers that good welfare must take into account the *affective state* of an animal – that is, what the animal may experience negatively or positively. Thus, for New Zealanders to be satisfied that the welfare of the animals is protected during transport and after arrival, it is important that reporting establishes whether the animals receive proper and sufficient food and water, adequate shelter, opportunity to display normal patterns of behaviour, physical handling in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress, and protection from, and rapid diagnosis of, any significant injury or disease.
4. NAWAC also considers that emergency responses and contingency plans are inherently limited during live export, especially sea transport. It would be extremely difficult to effectively respond to situations such as a vessel capsizing or unexpected delays when the animals are in transit. Delays may impact on food and water availability, hygiene and waste disposal, behavioural needs, and cause additional unnecessary stress to the animals due to increasing length of the journey. The animal welfare impact in such emergency situations is likely to be severe.
5. Based on the advice NAWAC has received, it appears that in its current state, and particularly in regards to the export of large numbers of animals by sea, live animal export presents a high risk to animal welfare with no clear animal welfare benefit.
6. Considering the significant risk to animals during and after live export, it is extremely unlikely that these risks can be mitigated to a level consistent with New Zealand's animal welfare strategy.
7. Alternatives to live exports are available, such as the export of germplasm and genetic material.
8. NAWAC therefore supports a total ban on the live export of animals as this is the best means to protect animal welfare.

Other options: a conditional ban on livestock export and/or further regulations

1. A conditional ban and/or implementing new regulations to enhance the livestock export system may be acceptable to NAWAC under certain circumstances.
2. As noted above, it is likely to be very difficult to mitigate many of the animal welfare risks associated with livestock exports.
3. If any form of livestock export is to continue, it is therefore essential that New Zealanders can be assured that the animals will experience good husbandry and welfare both during transport and for their entire lifetime after they have reached their destination.
4. NAWAC considers that this would require post-arrival reporting far beyond the current 30 day requirement. At a minimum, reports should continue for at least 12 months post-arrival; and ideally longer, for the animal's lifetime. When considering applications, focus would need to be placed on ensuring that exporters have a good relationship with destination farms and facilities in order to facilitate this.
5. To ensure that the welfare of the animals is safeguarded in countries where we have no jurisdiction, New Zealand should also limit export of live animals to countries that have welfare standards that meet or exceed our own. NAWAC understands that for many reasons, including international trade rules, deciding which countries these are and administering such a system is likely to prove exceedingly difficult.
6. NAWAC submits that to reduce animal welfare risk, regulations would need to be implemented requiring that all livestock journeys are as short as possible. NAWAC anticipates that this would effectively limit live export to transport by air rather than by sea.
7. Small consignments would be essential. Shipment size via any vessel must be limited so that individual care and attention is available during the journey.
8. Detailed journey reports, regularly audited by an independent third party, would be required. Welfare assessment and reporting by qualified and experienced observers must go beyond the current observation of mortality and significant health events, in a manner that accounts for the needs of these animals as sentient beings.

Other considerations for live export of animals

1. NAWAC has identified the export of germplasm as an alternative to live animal export. When genetic material is exported to countries with differing climate or management systems to our pastoral based agriculture, NAWAC notes that there is still potential for animal welfare compromise after birth. It is therefore important for animal welfare that animals are genetically, behaviourally and physiologically suited to their environment, and that those receiving and caring for the animals have sufficient knowledge and capabilities as stockpersons.
2. Where embryos are exported there remains risk that the genetics may not be suited to the environment, so NAWAC prefers that germplasm export is only done with semen, so 50% of the genetic input is from animals that are suited to the environment. Alternatively only specific genetics should be exported, for example genes that allow higher heat tolerance (e.g. the "Slick" gene).
3. NAWAC also notes that exceptions for emergency or humanitarian reasons may be required: such as allowing large numbers of live animals to be exported in order to quickly "re-stock" a nation after a natural disaster. NAWAC is not opposed to such

exceptions, but expects that these situations will be well defined and occur rarely. There would still be a need to manage animal welfare risks during and after transport as much as possible.