



Agriculture Victoria

Department of Jobs, Precincts and Regions

475-485 Mickleham Road
Melbourne, Attwood
Victoria 3049 Australia
Telephone: +61 3 9217 4200
DX 211278

ASEL Review
C/- Technical Advisory Committee Secretariat
Department of Agriculture and Water Resources
GPO Box 858
CANBERRA ACT 2601

Dear Technical Advisory Committee Secretariat,

ASEL REVIEW: AIR TRANSPORT

Thank you for the opportunity to provide comment on the air transport issues paper as part of the review of the Australian Standards for the Export of Livestock (ASEL).

Agriculture Victoria's submission to the air transport issues paper is provided in **Attachment 1**.

Yours sincerely,

Dr David Champness
Principal Veterinary Officer – Livestock Management Standards
Chief Veterinary Officers Unit, Biosecurity and Agriculture Services
Agriculture Victoria

10 / 05 / 2019

This page is intentionally blank

Attachment 1.

Agriculture Victoria submission to the ASEL review of air transport standards

Note: Agriculture Victoria provides no comment in this submission on the cost of any proposed changes to the current arrangements.

Questions about liveweights for livestock exported by air

1. *Should the minimum live weight of sheep exported by air be increased from 20kg to 24kg? Should it be higher/lower and why? What are the animal health and welfare risks?*

Agriculture Victoria supports an increase in minimum weight to 24kg. In paddock situations, to improve survivability, spring born weaner sheep should be at least 45% of their mature bodyweight when pastures dry off (i.e. 22-25kg).

2. *Should the minimum live weight of goats exported by air be increased from 14kg to 18kg? Should it be higher/lower and why? What are the animal health and welfare risks?*

A 14 kg rangeland goat is a relatively small goat. Boar goats are heavier for their age than rangeland goats. An 18kg boar goat is a young goat. Agriculture Victoria supports increasing the minimum 18kg weight. Should consider 20kg minimum weight for boar goats.

The health risk for transported goats which have been weaned at an early weight will be dependent on their ongoing nutrition. Early weaned goats will require a high protein diet.

3. *Are the weight restrictions for other species appropriate? Should a minimum weight be specified for other species? If yes, what should the minimum weight be (by species)? What are the animal health and welfare risks? Are there any mitigating measures that must be taken?*

Minimum weights should be based on industry recommended for weaning weights (or heavier) with minimum body conditions scores included.

4. *Should the standard include a provision for miniature breeds?*

Miniature breeds could be covered through consignment-specific management plans as the minimum weights will obviously be lower.

5. *Should the body condition score tables in [Appendix A](#), as recommended in the ASEL: sea transport final report, be adopted for air transport? Are there any other body condition score tables that should be considered?*

Yes, body condition score tables should be consistent throughout the ASEL standards.

Regarding **Table 2 Body condition score**, the body condition score for beef cattle rating is 1-5, therefore over-fat is simply '5', not '5 or more'.

Need to specify the beef and dairy body condition scores separately.

Why have a different BSC requirement for pregnant cattle? An emaciated pregnant cow in condition score 3 is not emaciated.

Should there be minimum BCS for sheep in table 2 rather than included under “all other livestock”?

Questions about deer and camelids

1. *Should the requirements relevant to exporting deer and camelids by air be replaced by the provision of consignment-specific management plans? These plans would initially cover the requirements contained within ASEL but would be required to be customised to address specialised animal health and welfare requirements for these high-risk consignments.*

Agriculture Victoria supports the proposed changes to consignment-specific management plans as this aligns sea and air transport standards.

2. *Are the standards in relation to rejection criteria for deer adequate? Should the requirements for antlers be revised? If so, how?*

Suggest consultation with a veterinarian(s) with deer husbandry experience to provide a sound animal welfare criteria.

Questions about pregnancy testing requirements

1. *Are the maximum days of gestation appropriate for cattle and buffalo? Should they be changed?*

Support status quo

2. *Should the maximum days of gestation be reduced for any other species? If so, which species and why?*

Pregnant goats should not be exported unless under consignment-specific management plans which can demonstrate minimal stress will occur. Pregnancy in goats is maintained by a corpus luteum, and therefore stress will cause goats to abort.

3. *Should the pregnancy testing requirements in section 3.3.4 and Appendix B of this paper be adopted for air transport?*

Yes, there should be consistency between sea and air standards for pregnancy diagnosis requirements.

Questions about non-farmed livestock requirements

1. *Are the standards for non-farmed livestock adequate i.e. wild caught camels or goats?*

See response to Q2.

2. *Should the standard be revised with respect to the minimum requirement for non-farmed livestock to become accustomed to handling and eating and drinking from troughs prior to export? Is 14 days adequate for camels? What other time frames could be considered and why?*

While it is acknowledged and in the current standards that wild caught camels and goats (rangeland) need an appropriate time to acclimatise to ‘domestication’, feeding and water

troughs, there should be provisions in the standards to ensure the animals have also acclimatised to the ration they are/will be fed around the transport period and the identification and removal of shy feeders.

Questions about vulnerable classes of livestock

1. *Should the standards be amended to remove existing references to livestock with young at foot and be replaced by a provision for a consignment specific management plan? These plans would cover the requirements contained within ASEL but would be required to be customised to address specialised animal health and welfare requirements for these high-risk consignments.*

Agriculture Victoria would support a provision for a consignment-specific management plan for the export of special classes of livestock with young at foot. The provisions would need to specify sufficient additional space and separation of dam and young from other such animals to avoid injury to the young. This provision for such vulnerable animals must not replace the selection requirement for, and compliance with the maximum days of gestation at scheduled date of departure.

2. *Are there specific requirements that need to be in place for vulnerable or special classes of livestock which are currently not addressed in the ASEL? Which categories of stock and what additional requirements are needed? Could these be managed under specific management plans, or departmental discretions?*

Any special classes of livestock not addressed within the ASEL should be considered on a case by case basis at the department's discretion and managed under consignment-specific plans.

Questions about livestock with horns

1. *Are the standards for horned goats adequate? Should the requirements regarding the length of horns be revised? If so, how?*

Agriculture Victoria would support a revision of the horn requirement for goats provided the outcome provides for minimising risk of injury to themselves or other animals and not restrict access to feed and water.

2. *Should the requirements for horned cattle, buffalo and sheep in section 3.6.3 of this paper be adopted for air transport?*

Yes, horn requirements should be consistent across the sea and air transport standards.

Questions about on-farm preparation of livestock

1. *Should the standards define a maximum travel time from the property where livestock are prepared to the airport? If so, what should it be? Should this be related to the anticipated total journey time from the property the livestock are prepared to overseas destination?*

Yes. The maximum time needs to take into account the anticipated total journey time from when taken off feed and water until the anticipated time the animals will be provided feed

and water at the overseas destination. The maximum time off water should align with the species and class requirements within the Land Transport Standards.

2. *Should the standards define a minimum rest period if livestock are returned to the property prior to being reloaded onto trucks for export?*

The minimum rest period (= spell with food and water) should be based on the time the stock had been off feed and water and the anticipated total journey time to the overseas destination and aligned to the Land Transport Standards.

3. *There is currently a difference in the requirements for premises used for preparation of livestock for export by sea and air. Should the standards be amended to require preparation for export by air to be completed at a registered premises (or an alternative)? If not, why not?*

The pre-export preparation premises whether 'registered' or 'approved' needs to be sufficiently close to the departure airport to meet the maximum transport times to the airport and for the return of consignments if flight delayed/cancelled. The premises must meet the importing country's protocol requirements for biosecurity and isolation as well as applicable Australian biosecurity and animal welfare requirements.

Questions about stock density

1. *Are the current stocking density and penning arrangements in the standard appropriate for air transport? If not, what should they be? Can this be done within the practical limitations for crates to fit on aircraft?*

No comment.

2. *Do you think more space is required for livestock loaded in the lower cargo compartment/hold of the aircraft? If so, why?*

No comment.

3. *Are the current provisions for 'rounding up' stocking densities appropriate (for example, 4.5 animals is rounded up to 5)?*

Caution is needed where 'rounding up' is used in smaller pen sizes as the additional 'half' an animal is increasing stocking density by 10% in the above example.

4. *Should the standard include specific stocking density and penning arrangement for alpacas? If so, what should be the basis for the stocking density calculation?*

The Land Transport Standards provides loading density guidelines for alpaca including space allowances. Alpaca should have enough space to be able to cush during transport.

5. *Should the standard include specific stocking density and penning arrangement for camels? If so, what should be the basis for the stocking density calculation?*

The Land Transport Standards provides a table of recommended space allowances. As per the Land Transport Standards "Camels need additional space to sit down with their legs folded underneath them on long journeys. Camels will travel best if they can sit whether it is a short or long journey".

6. *Should the standard include reference to head height (in relation to crate design)? If so, should the standard adopt international standards (IATA Live Animal Regulations) or use another measure?*

The Land Transport Standards guideline GB3.13 states 'livestock crates should allow resting hump clearance for land transport of 100 mm'.

7. *Should the standard include provisions for mixed sex loading (entire males or females) of crates/decks?*

Where possible, entire males should be separated from females.

Questions about water requirements

1. *Should a consignment specific management plan be submitted to manage the provision of water during transit stops?*

Agriculture Victoria would support the use of consignment specific management plans for addressing water (and feed) deprivation and curfew periods. Consignment specific management plans allows the flexibility to manage feed and water deprivation, and curfew times and distance (travel time) of the pre-export premises to the departure airport and total journey time to the destination country.

2. *Should a consignment specific management plan be submitted to manage the water deprivation time for the entire journey (from the property the livestock are prepared to the importing country)?*

Consignment specific management plans allows the flexibility to manage feed and water deprivation, and curfew times and distance (travel time) of the pre-export premises to the departure airport and total journey time to the destination country.

3. *Should there be a maximum water deprivation time for the entire journey (from the property the livestock are prepared to the importing country)? If so, how long (by species)?*

Yes., the maximum water deprivation periods should align with the maximum time off water standards in the Land Transport Standards.

Questions about inspection of livestock

1. *Are the current requirements for inspection of livestock practical and feasible? If not, why not and what are alternate suggestions?*

See below overall comments

2. *Are the facilities available at airports adequate to allow proper inspection of livestock?*

See below overall comments

3. *Should the standard be amended to require inspections at other points in the supply chain? If so, at which points and why?*

See below overall comments

4. *Should the standards require a competent person to accompany all or some consignments? If so, which consignments?*

Where it is possible to monitor/inspect (and treat if necessary) animals during the flight, then a competent stock person should accompany the consignment.

General comments to Q1-3 on livestock inspection requirements

- Animals must be inspected at the pre-export premises to ensure they are fit for the intended journey and pass the rejection criteria.
- Animals should be inspected before loading onto the aircraft to ensure they remain suitable to transport.
- There should be suitable facilities at the airport to remove any unfit/rejected animal for return to the pre-export premises.
- Where possible the consignment should be checked before the final cabin door is closed to ensure animals remain okay.
- Animals on the aircraft should be monitored where possible during the flight (this may not be feasible in all cases).
- Animals should be inspected on arrival as soon as possible.
- Where possible and safe to do so, any animals found to be sick, injured or distressed on the aircraft should be treated appropriately.
- The person conducting the inspections (and any treatment) must be a competent stock person.

Questions about reportable mortality rates

1. *Should the reportable mortality rates in [section 7.1.2](#) of this paper be adopted for air transport? If not, what reportable levels are appropriate (for each species)?*

The performance indicator (mortality rate) over the past 3 years (2016-2018) indicates a very low mortality percentage in sheep and goats and no mortalities for the other species. Based in these past records, a lower reportable level is indicated for air transport (compared to sea transport) in order for the department to gain meaningful information to promote continuous improvement in the export supply chain.

The reportable mortality rate could be lowered to 0.5% or 2 animals (which ever is the greater number of animals) for all species.

Questions about contingency planning and reporting requirements

1. *What further changes, if any, do you think are necessary to the end of journey reporting requirements in the standards?*

No comment.

2. *Should there be specific recording and reporting of animal welfare indicators in the end of journey report? If so, what might these indicators be?*

No comment.

3. *Should the requirements for contingency planning be expanded to cover more issues? If so, what types of contingency plans might be required for air transport?*

No comment.

4. *Is the current definition of 'notifiable incident' adequate?*

No comment.

Questions about general items

1. *Where there are provisions of international standards and requirements, such as the IATA Live Animal Regulations, relevant to and adopted by the ASEL, should they be reproduced in ASEL or referenced? How might this best be done?*

Where duplication may exist, the primary legislation (e.g. IATA requirements) could be referenced in the ASEL with a requirement to comply with primary legislation.

2. *Is the level of regulatory detail for the export of livestock by air in ASEL necessary and appropriate? Should the standards for air be largely outcomes focused and avoid prescription (given the role of the IATA Live Animal Regulations)?*

The Australian Government is responsible for the provision of export certification and export permits and is best placed to be the overall 'regulator' of the export supply chain. There are some parts of the export supply chain which fall under the responsibility of other regulators e.g. Land Transport Standards are regulated under state and territory legislation but referenced under ASEL as a mandatory requirement.

Are the IATA Live Animal Regulations appropriately monitored and enforced?