



Agriculture Victoria

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ASEL Review
C/- Technical Advisory Committee Secretariat
Department of Agriculture and Water Resources
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Dear Technical Advisory Committee Secretariat,

ASEL REVIEW 2018 STAGE 1.

Thank you for the opportunity to provide comment on stage one of the review of the Australian Standards for the Export of Livestock (ASEL).

Agriculture Victoria supports the proposed change in format of the ASEL document bringing together all the requirements of the 2011 version of ASEL (v2.3) together with the current export advisory notices, while removing the land transport requirements which are now covered under the Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock (Land Transport Standards) .

The proposed format provides a more concise and easily understood document through the removal of the land transport requirements, and simply referencing the Land Transport Standards, and the separation of the ASEL standards into four distinct sections (Outcomes 1-3, and the overarching requirements), followed by a series of appendices which can be more easily amended/updated as required.

Agriculture Victoria provides the following suggestions for enhancement to the proposed format.

1. **Scope** of ASEL – The ASEL standards do not include equids (horses, donkeys and mules), but it is unclear whether equids are 'livestock' or 'companion animals'. The DAWR website contains information for livestock, companion animals and reproductive material. Clarity of the scope of ASEL with respect to animal species is required.
2. The standards need to ensure the **roles** and **responsibilities** and **competencies** of those involved along the export supply chain are clearly defined.
 - a. The standards need to be clear as to who is responsible under each standard, especially if the standards are to be incorporated under the new Export legislation which allows penalties for offences and penalty infringement notices.
 - b. Personnel handling livestock should be trained in low-stress handling techniques.
3. The **Definitions** could be provided as a Glossary or Appendix at the back of the document rather than up front.

4. The **Overarching requirements** may be better placed before the three outcomes sections
 - a. 4B - Isolation requirements – 4B.1 General isolation requirements, and 4B.2 Isolation requirements may be more appropriately placed within Outcome 2. (preparation at domestic export facilities).
 - b. 4C.1 Prohibition for preparing sheep and goats to the Middle East may be more appropriately placed within Outcome 1 (fit for export / selection).
 - c. 4D. Animals have appropriate traceability – Consider replacing this heading with *Traceability requirements are met*.
 - d. Insert an additional requirement for compliance with recording livestock movements on the NLIS database under 4D (Traceability) e.g. *4D.X Livestock movements (NLIS database transfers) are recorded by the specified people within the specified timeframes.*
 - i. *Livestock movements (NLIS transfers) are recorded on the NLIS database within the required times specified in state and territory legislation:*
 - *Livestock movements from the property of origin PIC to the registered premises/depot PIC*
 - *Livestock movements from registered premises/export depot PIC to the port PIC*
 - *NLIS transfers from Port PIC to EEEEEEEEE (8Es).*
 - e. Insert an additional requirement for minimum residency period (on the property of origin) e.g. *4.D.Y Minimum residency period on the property is met*
 - i. *Animals sourced for export meet the minimum 30 day residency requirement for the property of origin, or the minimum residency period specified in the importing country protocol where this is longer than 30 days.*
 - f. 4D.2 Animal's treatment history – this heading would be more appropriately referred to as '*Record Keeping*', and separated from Traceability.

5. Appendix A

- a. Table #1. Body Condition Scoring (BCS) cattle. Table 1 requires updating. Beef cattle use a BCS system 0-5. The MLA published guideline - *A national guide to describing and managing beef cattle in low body condition scoring system* could be used or referenced. Dairy cattle use a BCS 1-8. The BCS Handbook for dairy cattle published Dairy Australia could be referenced.
- b. Table #2. Condition scoring sheep – could either reference an MLA published document with diagrams depicting each score, or insert diagrams.

Top issues

Agriculture Victoria provides the following issues which need to be addressed in the ASEL review.

These were contentious issues during the 2012 review of the ASEL. These are not necessarily in order of importance.

1. **On board stocking densities** for cattle, buffalo, sheep and goats, including densities for pregnant cattle, camels and buffalo.

Note, the 2012 ASEL review steering committee agreed to increasing the extra space for pregnant animals from 5% to 15%. Agreement also took place on removing reference to animals over 500kg from the ASEL which are no longer allowed to be exported.

2. Reducing the reportable mortality rates

Mortality rates have been incrementally improving since ASEL has been developed, and the mortality rates originally introduced are much higher than average mortalities currently experienced. Triggering additional investigations by reducing the mortality rate will not directly equate to improvements being made to the system unless such investigations are aimed at determining what factors may have led to the high mortality level and, where possible, recommending strategies to reduce the risk of these factors from reoccurring. Mortality investigations should form part of a process of continuous improvement.

3. Bedding and bedding management requirements

A report prepared by the Meat and Livestock Australia, W.LIV.0254 made comments regarding management of bedding during the livestock export process along the lines that:

- Bedding levels are currently insufficient and need increasing to facilitate better animal welfare, less injury from deck surface abrasions, more ammonia absorption, reduced slippage and improved hygiene.
- Furthermore, submissions suggest that the ASEL should ensure enough sawdust is provided/ loaded onto the vessel to allow for bedding replacement every 3 – 4 days of voyage duration, to coincide with deck washing programs, as well as enough to have the ship ready at loading and to provide enough sawdust for discharge points, ramps and traffic areas. Current levels of sawdust provision and application are greatly inadequate to ensure the well-being of cattle loaded.

4. **Minimum time** sheep, goats, cattle and buffalo must remain **at a registered premises** prior to export by sea. This should also address the sourcing of feral (rangeland) goats for export by sea.

The main issue with minimal times in the registered premises relates to the time required for adjustment/acclimatisation to the feed which will be provided on board the vessel, feeding from troughs, and sufficient time for the identification and removal of shy feeders before loading.

Agriculture Victoria also provides the following specific comments on some standards. The below comments are not format issues, and may be left over for a later review stage specifically relating to the standards.

- Definition of emaciated and over-fat body condition in relation to 1A.3.1 (A) (i) emaciated or over-fat body condition score. Need to revise the definition of emaciated and over-fat body condition to align the minimum and maximum BCS with which ever body condition scoring systems are used for beef and dairy cattle.
- 1A.3.1 (d) *Mobs with unusual mortalities over the whole period of pre-export isolation are not fit to export and the whole mob must be rejected.* What defines 'unusual mortalities'? Is this mortalities which cannot be explained, or is it linked to the levels of mortalities stated in 1B.1.(c) as a trigger for veterinary investigation? Probably need a definition or guidance on what constitutes 'unusual mortalities' necessitating whole mob rejection.

- 1B.1 (a)(i) *be clearly identified as unfit to export* – Current wording does not specify if it relates to the specific consignment (presumably), or any future consignments.
- 2A.2 (a) (v) *the quantity of feed available should meet at least the minimum daily feed requirements, which are*
 - The 'should' should be replaced with 'must'.
 - There is no minimum trough space allowance for ration feeding for cattle.
- 2A.2 (a) (vi) There is no minimum water trough size/capacity, and provision for shade of water troughs in hot environments to prevent excessive heating of drinking water.
- 2A.2 (b) *to ensure adequate shelter* is very vague on actual requirements.
- 2B. *Animals are responsibly managed* There should be guidance for the adoption of low-stress handling techniques.
- 3A.3 1 & 2. There are no minimum specifications, or description, in the standards surrounding space allowances for feed-troughs (allowances per head), nor water-trough space or numbers of water-trough points as a ratio of the total pen-size of animals.
- 3A.5(a) Contingency plans... Include unforeseen delay/extended journey duration.
- 3B.7 (iv) Need to insert *Land Transport of Livestock* following *Australian Animal Welfare Standards and Guidelines* in the Note under clause (iv).

Should you require any clarification on matters raised, I can be contacted by email - david.champness@ecodev.vic.gov.au or phone 03 55730703.

Yours sincerely,



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