



## AgForce Cattle Ltd

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Ref : G099

Wednesday 19 September

Mr Steve McCutcheon  
Chair, Technical Advisory Committee  
Australian Standards for the Export of Livestock Review  
By web address

Dear Mr McCutcheon,

### **RE: Review of the Australian Standards for the Export of Livestock - Issue Paper 2**

AgForce Queensland Farmers (AgForce) is the peak rural group representing beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2015-16. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. The producers who support AgForce provide high-quality food and fibre to Australian and overseas consumers, manage around 40 per cent of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

Please see attached AgForce's Submission to the Technical Advisory Committee (TAC) overseeing the review of the Australian Standards for the Export of Livestock. AgForce supports the two submissions provided by Cattle Council of Australia and has chosen to add an additional submission in light of the potential change to legislation in Queensland enabling lay pregnancy testing of cattle.

AgForce is working with the Queensland Department of Agriculture and Fisheries to amend the *Veterinary Surgeons Act 1936* to enable accredited lay pregnancy testers to participate in the market. AgForce suggests a transparent nationally applicable and inclusive accreditation system which accommodates lay and vet testers, utilising ultrasound and manual palpation and incorporating a traceability system will ensure a high standard of pregnancy testing which meets animal welfare standards. AgForce is confident of a change in Queensland legislation and requests the TAC consider this in their review of ASEL.

Yours sincerely

Anthony (Bim) Struss



**September 2018**

**AgForce Submission**

**Australian Standard for Live Export Review**

## **INTRODUCTION**

AgForce is the peak rural group representing the majority of beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2015-16. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. Our members provide high-quality food and fibre products to Australian and overseas consumers, manage around 40 per cent of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

## **BACKGROUND**

AgForce supports the submissions provided by the Cattle Council of Australia to represent our views on the Australian Standards for the Export of Livestock Review however, we have a particular concern with the way the current legislation refers to pregnancy testing of cattle and this submission focuses on this one issue.

AgForce has been working with the Queensland Department of Agriculture and Fisheries (DAF) to amend the Veterinary Surgeons Act 1936 to enable trained and accredited lay pregnancy testers to receive a fee for service. DAF have drafted a regulatory impact statement which is due to be released for public consultation later this year.

The amendments have been developed in collaboration with the DAF, RSPCA, Australian Veterinary Association (AVA), Australian Cattle Veterinary Association, Australian Lot Feeds Association (ALFA), Queensland Livestock Export Association, Cattle Council of Australia and are supported by Hon. Mark Furner, Minister for Agricultural Industry Development and Fisheries.

To support the amendment AgForce has developed a training and accreditation program with Queensland Ag Colleges, AUSMEAT, Catagra and ALFA for pregnancy testing cattle. The program, TestRight, builds on the national unit of competency AHCLSK408 Pregnancy Test Animals, incorporates the AVA PregCheck program and builds further transparency through a data capture tool that enables the accredited tester to record information about all cattle tested. Accurate record keeping, and timely certificate writing have been identified by exporters and regulators as an issue in the current system. TestRight records, who (accredited tester), when, where (PIC), mob-size, NLIS tag, management style, and destination providing a level of transparency of process and record keeping not currently available. The use of available technology will provide a robust and verifiable system without adding additional paperwork.

The TestRight scheme will be open to all vets and lay testers to use Australia wide and will enable northern Australia to harmonize standard of pregnancy testing.

### **What is the problem we are addressing?**

Queensland producers are at a competitive disadvantage to their neighboring states that do not require a vet for live export. Calls for more services in northern Australia have not delivered more vets and live exporters are constrained by the lack of service, additional cost, and difficulty with record keeping and

certificate lodging. There is also unmet demand for herd management which lay testers are currently meeting illegally in Queensland.

Producers require a reliable pregnancy testing service that upholds the current high standards of animal welfare, is traceable and providers accountable service providers. Exporters require certainty that the cattle meet the destination country protocols and specifications for export. AgForce is confident the training and accreditation program TestRight will be used across northern Australia to both lift herd productivity, meet export demand and improve the current service offered.

### Questions relating to Pregnancy requirements page 27 Stage 2 issue paper

#### Answers are only in response to Pregnancy testing Cattle

Q3. Must pregnancy testing be undertaken by a vet or is a competent pregnancy tester acceptable? Should it be expanded to any livestock pregnancy tester as accredited by the state or territory?

Pregnancy testing is a competency-based skill which improves with practice and experience. It could be undertaken by either a vet or an accredited pregnancy tester. AgForce supports expanding the definition to include any livestock pregnancy tester as accredited in the state or territory.

Producers choose the service required based on skill, convenience, cost and market requirement. Over a number of years there have been many instances where the availability of vets to pregnancy test for live export, during peak export periods has been completely inadequate. The addition of an accreditation program for lay pregnancy technicians will provide an alternative, while maintaining high standard of competency, animal welfare and accuracy.

We ask that the committee considers the ASEL review in relation to a legislative change in Queensland and to consider amending the definition of a competent pregnancy tester to accommodate any potential amendment to the Vet Surgeons Act 1936.

Further the ASEL refers to use of ultrasound for testing.

*Competent pregnancy testers may only diagnose pregnancy for feeder/slaughter cattle or buffalo by manual palpation and are not approved to use ultrasound diagnoses or the IDEXX pregnancy test.*

AgForce argues ultrasound technology is well established and relied on in other countries for its accuracy speed and reliability. Ultrasound competency is linked to experience and should be allowed as a viable tool in any pregnancy testers kit. TestRight accreditation scheme incorporates training and accreditation for ultrasound as well as manual palpation and will facilitate the establishment of a verifiable standard of pregnancy testing for both methods. AgForce requests the review considers not restricting pregnancy testing to manual palpation and expand the definition to include both methods.

Nationally CCA, ALEC and ALFA have commenced a study into what the 'National Standard' for pregnancy testing should be. Once established the benchmark for accredited testers will be set providing additional strength to the Queensland accreditation program.

<p>The legislation may change in Queensland to accommodate lay testers accredited through the TestRight scheme. If this happens the ASEL will need to reflect the state new legislation. AgForce supports the expansion of the definition of a valid pregnancy test by a competent pregnancy tester to either accommodate an accredited pregnancy tester or to reflect the national standard.</p>
<p>Q4. Should the 30 day period prior to export for pregnancy testing be extended to 45 days as a blanket change? Should there be discretionary allowances for low-risk cases, such as unjoined heifers or a shipping delay, where adverse animal welfare outcomes are likely to result from re-testing?</p>
<p>No doubt there are exceptional circumstances however, the process of verification to establish tested heifers are un-joined and remain so is not clear. Under a robust verification process then flexibility is supported. Further investigation is required to ensure pregnant cattle are not accidentally exported.</p>
<p>Q6. Are the methods for carrying out pregnancy tests appropriate? Are there any appropriate national pregnancy testing criteria currently in place that should be adopted/referred to in the standards?</p>
<p>Differences between states and territories on pregnancy testing requirements are leading to potential inadequacies in the system. There is no one data capture system to provide verification and manage risk. AgForce proposes an accreditation system that provides accountability, is inclusive of vets and technicians and provides a standard to ensure the system is robust and benchmarked. This program forms part of the regulatory amendments proposed in Queensland.</p> <p>AgForce supports the development of a National Standard of Pregnancy testing and has openly collaborated with the researchers providing all relevant content to the study. The accreditation scheme proposed in Queensland will encompass any national standard once established. However, it is important to note a national standard may be difficult to negotiate in the short term and a more market led proposal may emerge if Queensland legislation is amended before the national standard is determined.</p>
<p>8) What would be the cost implications for any proposed changes to these requirements?</p>
<p>Nationally harmonised standards will facilitate the adoption of a national accreditation scheme. The more people in the scheme the lower the administration costs. Development of the tools and program will occur under an MLA funded program already agreed to by MLA. Cost of managing the scheme are dramatically reduced through the use of technology and data management building compliance and traceability in from the ground up.</p> <p>The steady increase in both vets and lay pregnancy testers in Queensland is an indication the market is large enough to accommodate both vets and technicians. The Australian Vet Association statistics indicate veterinary workforce has steadily grown from 1,830 in 2000 to 2,555 in 2015. Over this period the lay pregnancy testing market has also significantly increased in line with an increase in training and uptake of ultrasound. It is clear the market is growing and able to accommodate both vets and technicians.</p>