



## Agriculture Victoria

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Ref:

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 2018 STAGE 2.**

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

Agriculture Victoria's submission to the Stage 2 Issues paper is provided in **Attachment 1**.

Yours sincerely,

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## Attachment 1.

# Agriculture Victoria submission to Stage 2. Issues paper for the Review of the Australian Standards for the Export for Livestock

## Questions about reportable mortality rate

### **1) Should the current reportable mortality rates (RMR) be revised and, if so, how?**

Yes, the RMR should be revised, reducing the current ASEL RMR for each species by half, (noting DAWR has already reduced the RMR for sheep to 1% following the recommendations of the McCarthy report). The mortality rates have been incrementally improving since ASEL was developed, and the reportable mortality rates originally introduced are much higher than average mortalities currently experienced.

It is also important that morbidity rates are recorded, as animal welfare can still suffer even though the animals do not die.

### **2) At what level of mortality should a notifiable incident be declared, thereby triggering an investigation?**

As per the definition of a notifiable incident – a shipboard mortality rate equal to or greater than the reportable level.

### **3) Should there be a relationship between the average mortality rate and the RMR and should it be reviewed annually?**

The average mortality rate provides an indicative industry bench mark and provides for the setting of a suitable RMR, and it should be monitored annually, but probably reviewed every few years. One or two high mortality shipments as occurred with the Awassi Express to the Middle East in August 2017 can inflate or even spike an annual average. If the RMR was to be linked to an average mortality rate, then 'extreme' incidents should be excluded from the calculation.

### **4) What should be the stated purpose of an RMR, and what should be the consequence(s) of exceeding the RMR for a voyage?**

The RMR should be a trigger for an investigation as to the cause of higher mortality rate and the contributing factors leading to the higher mortality, and as a trigger point for a review of Standard Operating Procedures, or the infrastructure design of the vessel, that cause animal welfare outcomes to be impacted.

The information gained from the investigation should be used to inform recommendations for improvements in livestock export management practices to and mitigate future high mortality rates and animal welfare issues.

The consequences of exceeding the RMR for a voyage should depend on whether there was negligence, incompetence or a lack of compliance with the requirements of ASEL and any applicable industry guidelines, or design faults. The consequence should be a change in either working practices, or design, to improve the situation.

Persistent defaulting should result in penalties in the form of fines, or prison-terms, and forfeiture of operating licences.

**5) Should the RMR also relate to classes of livestock (within species), different areas of the vessel etc. as well as length of journey?**

The RMB should relate to each class (within species) of livestock where there are mixed classes in a shipment, such as pregnant heifers and feeder animals. For example, there may be high mortality rates in one class of animals (e.g. pregnant stock) making up a smaller proportion of the total shipment, and the mortality rate in that class being above the RMR, and the overall mortality rate being below the RMR, due to the averaging effect.

The trigger points should be set at a lower level (earlier reporting/action/intervention) for the most vulnerable classes of livestock.

The vessels should be designed/fitted-out such that RMR's should not need to vary across different areas of the vessel.

Consideration should be given to having a RMR (within classes and species) for each deck on the ship, with a 20% buffer, allowing for example a mortality rate in one deck of sheep of up to 1.20% without triggering the 1% RMR (notifiable event), providing the average mortality rate across the shipment of that class of animals was below the RMR.

**6) Should the RMR be replaced by, or supplemented with, reportable levels for more general welfare indicators (e.g. see McCarthy Review report)? If so, what should the welfare indicators be and what should be the reportable level for each?**

The RMR should not be removed but it should be supplemented with reportable levels for more general health and welfare indicators. The use of a heat stress score (incorporating a panting score) provides additional indication of welfare and should be implemented.

Mortality rate by itself is a poor and very crude and limited indicator of animal welfare.

## Questions about voyage reporting

**1) What further changes, if any, do you think are necessary to the voyage reporting requirements of the standards?**

Reports should be standardised using a template, preferably electronic where feasible. Additional welfare indicators should be included in the daily reports, particularly where there is higher risk of welfare issues due to environmental conditions.

**2) Should the voyage reporting changes recommended by the McCarthy Review and then instituted by the Department be applied more broadly?**

Voyage reporting standards as recommended by the McCarthy review should be more widely adopted, but further improvements are required about the use of that information as suggested under section 3.1.

**3) Some stakeholders would like voyage reports to be publicly available, while others argue that this approach may limit candour. What is the best approach to balance public transparency with frankness in reporting?**

The original voyage reports should probably not be made public (so not to restrict expression of views and opinions) but a report summary could be provided by the Commonwealth department. The identification of the AAV/stockpersons, etc, and stock property of origin information should not be public.

**4) Should there be on board real-time monitoring of animals and vessel conditions? If so, what should these be and what would be the cost?**

Real-time monitoring of animals, and their environment, should be implemented, along with specific recording and reporting of environmental parameters. It is important that it is not just about monitoring and recording the data but having a contingency plan as to what should change, or happen, in response to reports of worsening conditions.

**5) Should there be specific recording and reporting of additional environmental parameters on vessels during voyages? What might these be, and can or should reportable 'trigger' levels be set?**

No specific comment other than any trigger levels should be risk based and based on known science.

**6) Should there be specific recording and reporting of animal welfare indicators during, and at the conclusion of a voyage? If so, what might these welfare indicators be, how frequently should they be measured and can/should reportable trigger levels for these measures be established?**

There should be specific recording and reporting of animal welfare indicators both during and at end of a voyage. Reporting during a voyage will help to identify and enable action to mitigate animal welfare issues.

**7) If reporting requirements are increased, what might be this cost and who would pay?**

Increased costs incurred in creating a framework to improve animal welfare should be covered by the beneficiaries of the trade.

## Questions about limits relating to heat stress risk assessment application

**1) Should paragraph 3A.4 (a) (ii) be amended to include other geographical locations?**

Yes, other geographic locations should be included, particularly voyages passing through the Middle East, and areas with risky environmental conditions.

**2) Is the restrictive period of May to October for voyages departing to the Middle East appropriate? Are these the high risk months for heat stress for animals being exported to the Middle East? If not, what months should be considered as high risk?**

The period of May to October is a suitable restrictive period for voyages departing to the Middle East AND should apply to other destinations in the northern hemisphere with similar weather conditions. The period should be reviewed regularly, and also take into account forecast weather conditions in April and November in case of extended extreme weather events.

**3) Are there different high risk months for different markets that aren't considered in the standards?**

## Questions about sourcing Bos taurus cattle

**1) Should Paragraph 1A 3.2 (c) (iii) be retained in its current form?**

Paragraph 1A 3.2 (c) (iii) appears reasonable.

## **2) Should Paragraph 1A 3.2 (c) (iv) be retained in its current form?**

Paragraph 1A 3.2 (c) (iv) will require amending to align with the 0-5 BCS system. An upper BCS of 4 should probably apply.

Where the cattle are sourced from (i.e. acclimatised) is more important than where they were 'bred'. They may be bred north or south of Lat 26, but be residing (sourced) from a different location, where they may (or not) be acclimatised.

Consider using the heat stress risk assessment approach, rather than lines on maps or specific date limitations.

## Questions about shearing livestock with wool, fibre or hair

### **1) Should there be a minimum period of time off-shears and/or wool length to apply for all wool sheep being sourced for export?**

Yes, there should be a minimum period of time off-shears and/or wool length to apply for all wool sheep being sourced for export. There should be a minimum five days period of time off-shears to allow for the healing of any shearing cuts before loading.

A maximum of 25mm wool/hair length seems a reasonable to allow for monitoring health and welfare and for stocking density purposes.

Where sheep require shearing before export, the weather forecast for the ensuing days should be taken into account. Snow combs and/or shedding should be utilised where sudden cold/wet weather conditions are forecast.

### **2) Should all hair sheep and alpacas be subject to the same requirements as wool sheep?**

Alpacas, goats and hair sheep which shed wool/hair should be subject to the same requirements as wool sheep. An exemption for the Awassi sheep breed could be considered if there is science to support the claim of 'heat tolerance'.

### **3) Should the standards be amended to alter the specifications currently in place prescribing time-off periods for shorn wool sheep and shorn hair sheep? If so, what would you suggest?**

As per Q1, have a maximum of 25mm wool/hair, and a minimum 5 days off-shears.

### **4) Are any other changes necessary to the requirements for wool sheep and hair sheep?**

As above.

### **5) Should the current standards regarding timing of shearing prior to loading for export by sea be revised?**

Yes, as per above. Setting a minimum 5 days off-shears, and maximum 25mm wool/hair nullifies a complicated timing issue of shearing on-farm or at the depot.

## Questions about maximum weight for cattle and buffalo to be exported by sea

### **1) Should the maximum weight for sourcing and exporting cattle and buffalo be the same?**

Yes, the maximum weight for sourcing and exporting cattle and buffalo should be the same, unless there is good evidence that heavier buffalo can handle the voyage without compromise to their welfare.

**2) Should cattle and buffalo exported for feeder and slaughter purposes have a different maximum weight to cattle and buffalo exported for breeder purposes?**

No, cattle and buffalo exported for feeder and slaughter purposes should not have a different maximum weight to cattle and buffalo exported for breeder purposes. Exemptions may be required for bulls exported for breeding purposes.

**3) Is 500 kg appropriate? Is 650 kg? Should it be higher/lower and why? What are the animal health and welfare risks? Are there any mitigating measures that must be taken?**

Due to the physics of the musculoskeletal interaction with the floor surfaces of the pens, and the movement of the ship, heavy cattle should be precluded from export, especially on long-haul journeys. What weight constitutes a heavy animal for these purposes should be investigated scientifically but is likely to be below 500 Kg. Exemptions may be required for bulls exported for breeding purposes.

**4) Is a weight restriction appropriate and are there extra conditions that should apply or should it be more specific, for instance, a body condition score and breed?**

Weight alone may not be a suitable determinant, and a combination of weight-for-age and body condition score may be a better combination. Larger breeds (large frame score) will be heavier for the same body condition score compared with smaller breeds.

Scientific assessment of what the cut-off values should be will need to be undertaken.

## Questions about minimum hold times in registered premises

**1) What is the minimum time that sheep and goats should be held in an outdoors registered premises prior to loading aboard an export vessel? Should other provisions be included regarding seasonal factors, feeding and pre-conditioning to shipboard rations?**

Sheep and goats should be held in outdoor registered premises for a minimum 7 clear days, so as to allow for rumen acclimatisation to change of feed, including pre-conditioning to shipboard rations, and the recovery from transport stress. As per the issues paper, industry research has stated 'sheep assembled for 7-8 days had a lower risk of mortality than those assembled for 3 to 6 days'.

This additional time also allows for the identification and removal where necessary of shy feeders. Outdoor registered premises should provide sufficient shelter to protect stock from extremes in weather.

**2) What is the minimum time that sheep and goats should be held in sheds registered premises prior to loading? Should other requirements be made for seasonal factors, feeding and pre-conditioning to shipboard rations?**

Sheep and goats should be held in sheds registered premises for a minimum 7 clear days, so as to allow for rumen acclimatisation to change of feed, including pre-conditioning to shipboard rations, and the recovery from transport stress. As per the issues paper, industry research has stated 'sheep assembled for 7 to 8 days had a lower risk of mortality than those assembled for 3 to 6 days'.

This additional time also allows for the identification and removal where necessary of shy feeders.

**3) Should the standards be amended to alter the specifications currently in place prescribing timelines for various classes of livestock to remain at a registered premises prior to export by sea? If so, what would you suggest?**

Livestock need to be provided sufficient time at registered premises prior to export by sea to allow for rumen acclimatisation to feed changes, including preconditioning to shipboard rations. Importing country protocols may specify additional time requirements for isolation to meet health protocols.

**4) What would be the cost implications of any changes to the times livestock must spend in registered premises?**

## Questions about the management of shy feeders and inanition in sheep

**1) What measures should be required to reduce the incidence of inanition and salmonellosis in sheep? Are the current requirements in the standards adequate to manage shy feeders and inanition in sheep?**

As described above, providing sufficient time for commingled animals to adjust to a new hierarchy, a new environment and new ration will help immensely in reducing inanition.

A correct, and fully implemented, vaccination programme will help reduce losses due to *Salmonella*.

**2) If not, what changes would you suggest?**

Shy feeders need to be identified and removed. Weight gain/loss could be used to monitor for shy feeders, e.g. sheep could be individually identified with electronic NLIS tags and weighed the day after arrival at the registered premises and again 5 days later to identify sheep not eating sufficiently.

**3) What would be the cost implications of any proposed changes to these requirements?**

## Questions relating to pregnancy requirements

**1) What is the risk of changing the pregnancy test requirement from all Damara sheep to only those that weigh over 40 kg?**

Suggest this question is referred to the Sheep, Goat and Alpaca Veterinarian's Special Interest Group of the Australian Veterinary Association for export advice.

**2) Should the standards be expanded to include all fat-tailed sheep and not just Damara? Fat-tail sheep being: sheep distinguished by a genetic predisposition for the accumulation of fat in the tail and hindquarters.**

The standards should include all sheep.

**3) Must pregnancy testing be undertaken by a veterinarian, or is a competent pregnancy tester acceptable? Should it be expanded to any livestock pregnancy tester as accredited by the state or territory?**

Only veterinarians can provide a pregnancy status certification. A person performing cattle/buffalo pregnancy testing for export should be assessed as competent pregnancy tester to the competency assessment of the National Cattle Pregnancy Diagnosis Scheme.



Ultrasound pregnancy diagnosis in cattle and sheep could be undertaken by an accredited non-veterinarian pregnancy tester, but that individual would need to be assessed by an experienced veterinarian prior to accreditation as to their ability to accurately identify pregnancy AND foetal age.

**4) 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.**

It would be appropriate for a discretionary allowance for low-risk cases, such as unjoined heifers or a shipping delay, where adverse animal welfare outcomes are likely to result from re-testing, but only if assurances are in place that joining in the interim could not have inadvertently taken place.

**5) Should the age that goat kids and ewe lambs are pregnancy tested be increased to more than five months? What would be an appropriate age for goat kids and ewe lambs to be tested?**

Minimum body weight eg. 40 kg may be a better trigger for a requirement for pregnancy testing than age, (especially when actual birth date is not usually known).

**6) 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?**

The method of pregnancy testing should be determined by the accredited competent tester. Generally manual palpation and/or rectal ultrasound will be used for cattle and/or buffalo, and ultrasound used for sheep and goats.

**7) Should breeder cattle and buffalo only be determined as too small to be manually palpated safely by a veterinarian accredited under the National Cattle Pregnancy Diagnosis Scheme (NCPD) or should this be any veterinarian?**

Any accredited competent pregnancy tester should be able to make this assessment.

**8) What would be the cost implications for any proposed changes to these requirements?**

## Questions about stocking density

**1) Do you agree with the application of an allometric model for densities? What is the appropriate k value and why? Should the k coefficient value vary depending on the species and voyage length?**

An allometric model for densities is appropriate, as long as the k value used allows, in reality, sufficient space in the pen layout for animals to be able to lie down, and others move around without stepping on them, and sufficient space for all animals to access feed and water as and when they wish to eat or drink.

The highest economically appropriate k value should be used to optimise animal welfare.

**2) Should the McCarthy Review application of a k coefficient of 0.033 be applied more broadly?**

An appropriate K coefficient should be considered depending on the class of stock, pregnancy status, length the voyage length and predicted environmental conditions, rather than a blanket approach.

**3) How would you standardise liveweights? Is it appropriate to apply a factor associated with curfew and anticipated weight during the voyage? How else can curfew and weight gains after leaving the registered premises be accounted for?**

Average weights and ranges in the different classes of stock can be easily measured by weighing a reasonable number of stock while in the registered premises.

Why use curfew weights when the stock are not under curfew on the ship? The true live weights should be used (using averages across the different classes), and allowing for weight gains, particularly in sheep.

Weight gains after leaving registered premises should be predicted using computer models such as grazfeed and past records of weight gains or feed intake. Assessment of the body condition scores of the animals will assist in this monitoring process.

**4) What is the financial impact of changing on board stocking densities?**

One would expect so, however the welfare of the animals is paramount.

## Registered premises stocking density

**1) Are stocking densities at registered premises an issue?**

Failure to stipulate stocking densities at registered premises could create issues.

**2) What do you think about the options presented in the 2012-13 review? Should any of those options now be implemented?**

An individual space allowance of 5m<sup>2</sup> rather than the current 4m<sup>2</sup> for cattle, buffalo or camels held for **less than 10 days**, based on an individual live-weight of 500Kg, would be more appropriate, increasing to 9 m<sup>2</sup> for cattle held 10 days or more.

The proposed space allowance for sheep, based on a live-weight of 54Kg is only appropriate for shorn sheep, otherwise it should be 1 – 1.2 m<sup>2</sup> for those in fleece.

The minimum stocking densities could be aligned to those required for cattle and sheep feedlots. Beef cattle feedlots require a minimum 9m<sup>2</sup> per Cattle Standard Unit under the Australian Animal Welfare Standards and Guidelines for Cattle.

**3) What are the cost implications of changing stocking densities in registered premises?**

## Bedding and ammonia level questions

**1) What specific requirements (i.e. volume, usage, and components) should exist for bedding material for export consignments of cattle and sheep? Should these apply to all voyages or only some? Should it apply to all species or only some?**

A review of any scientific literature and findings should be undertaken to determine the most appropriate requirements to recommend in relation to volume, usage and components of bedding, and the specifications and management for ammonia levels on vessels.

**2) Should the standards be amended to alter the specifications currently in place to manage provision of bedding for livestock and ammonia levels on vessels? If so, what would you suggest?**

**3) Should there be a requirement that bedding is used to manage an appropriate faecal pad? Should a statutory reserve amount of bedding be required as a contingency amount to manage any flooded pens?**

There should be a statutory reserve amount of bedding as a contingency to manage any flooded pens.

**4) What would be the costs of any changes to the current arrangements?**

## Water, fodder and chaff requirements on vessels questions

**1) Should paragraph 3A.3.2 (c) be amended as follows: a) 'For all long-haul and extended long-haul cattle voyages, at least 1 per cent of the fodder required for cattle must be chaff and/or hay.'**

Suggest 'yes'.

**2) There are a range of issues relating to shipboard fodder requirements being reviewed within Industry. In the interim, are there any other changes to water, fodder and chaff requirements that need to be addressed?**

Hay/chaff should be made available for animals in hospital pens and/or with digestive issues. Good rumen health is important not just for nutrition, but also other welfare related issues in ruminants including acidosis, hoof health, general health, and overall well-being. Poor ration design (both energy/protein balance, provision of minerals, and adequate long-fibre) can contribute to many poor animal welfare outcomes.

**3) Should automated water systems be mandatory on all voyages? What would be the cost associated with this change and who should pay?**

Automated water systems should be made mandatory on all voyages.

**4) Should there be extra fodder provisions for voyages longer than 10 days?**

It would be sensible to have extra fodder provision on long-haul voyages for contingencies/delays.

## On board personnel and the monitoring and management of animals questions

**1) In addition to the ship's crew, which on board personnel should accompany livestock export consignments? Should this apply to all consignments? Please provide detail.**

All consignments should be accompanied by an Australian registered veterinarian (AAV), and this person should be in addition to accredited stockpersons.

**2) Should the current requirements in the standards be amended and, if so, what elements should be changed?**

Yes, the current requirements in the standards should be amended as per the responses to these questions.

**3) What is your view of the three options for AAVs accompanying voyages proposed during the 2012-13 review, and why?**

All consignments should be accompanied by an Australian registered veterinarian (AAV), and this person should be in addition to accredited stockpersons.

**4) Does the requirement for Independent Observers now in place modify or change the need for AAVs to accompany some or all voyages?**

No, the Independent Observer should be in addition to the AAV and accredited stock person/s.

**5) What do you believe the roles and responsibilities of the following personnel should be, and why? a) AAVs b) Stockpersons**

The AAV should be responsible for overall monitoring of the livestock health and welfare, disease monitoring, diagnosis and treatment, euthanasia of stock, and/or overseeing euthanasia, and ensuring recording and reporting requirements are met.

The stock persons should be responsible for overseeing the day to day livestock management – feeding, watering, bedding maintenance, monitoring the health and welfare of stock and reporting any issues to the AAV.

**6) If AAVs are to be placed on more or all voyages, what is the additional cost and who should pay?**

The exporter should pay the additional cost.

**7) Is it a practical requirement for stock handlers on board to be able to observe all animals at all times during a voyage? If not, what requirement should exist to ensure animal health and welfare is appropriately monitored during a voyage?**

All animals on board should be able to be observed at all times. Stock handlers are essential to recognise potential issues and behaviour changes. Additional methods could involve CCTV or other electronic monitoring but this should be in addition, not replace stock handlers.

The numbers of stockpersons appointed should be at a level, dependent on the numbers of livestock onboard, to ensure good animal welfare outcomes can be maintained. The proposal of one accredited stockperson per 2,500-3,000 head of cattle, or 40,00 to 60,000 sheep seems a high number of animals for one person to effectively monitor.

## Vulnerable/special classes of animals questions

**1) 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?**

Vulnerable or special classes of livestock should be provided for through specific management plans. Additional space for pregnant animals should be captured in the stock density standards.

Entire males should be socialised in the groups they will be penned with onboard before export, i.e. at the registered premises.

**2) Should the requirements in the standards be amended to address concerns raised about safeguards for vulnerable/special classes of animals? If so, what changes should be made?**

## Minor amendments

### **ASEL Review Technical Advisory Committee interim recommendations:**

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

**a) Specific comments made by Deer Industry Association of Australia will be considered for updating the minimum requirements for deer consignments.**

Agriculture Victoria supports this recommendation as an interim measure.

**2) Definitions for ‘pastoral’ and ‘station’ sheep to be included as agreed in 2012-13 and in Appendix A of this issues paper.**

Agriculture Victoria supports this recommendation.

**3) Updated and industry standard body scores to be included as agreed in 2012-13, as proposed by the Australian Buffalo Industry Council, and as detailed in Appendix B of this issues paper.**

Agriculture Victoria supports this recommendation.

**4) Terms to be quantified through drafting the standards text to remove legal uncertainty of certain standards. Definitions list to be thoroughly reviewed, considering the Australian Animal Welfare Standards and Guidelines definitions.**

Agriculture Victoria supports this recommendation.

**5) Amend ASEL to reflect that Appendix F Table #10 applies to all classes of cattle and buffalo exported by sea, not only slaughter and feeder classes.**

Agriculture Victoria supports this recommendation in associated with question 6 below.

**6) Appendix F—Mandatory veterinary medicines and equipment—is updated:**

**a) Upon completion of research by Livecorp into Shipboard drug use**

**b) In consultation with experienced shipboard AAVs**

**c) With consideration to the causes of poor welfare outcomes and mortalities upon review of consignments**

Agriculture Victoria supports this recommendation.

**7) Divided into minimum requirements for the voyage and minimum doses per quantity and class of animals.**

Agriculture Victoria supports this recommendation.

**8) Amend 1A.3.4(d)(i) to increase the minimum liveweight of sheep for export by sea from 28 kg to 32 kg**

Agriculture Victoria supports this recommendation.

**9) Amend 1A.3.4(e)(i) to increase the minimum liveweight of goats for export by sea from 22 kg to 24 kg**

Agriculture Victoria supports this recommendation.

**10) Paragraph 1A.1.1 (b) should be amended to:**

**a) 'When goats are exported by sea, they must be inspected by an authorised officer or AAV at least once during export preparation, (excluding the day of delivery to the registered premises and day of final inspection prior to loading), to confirm the goats have been held in the registered premises for five (5) days and fed appropriately as per Appendix D.'**

**b) apply to all sea voyages of goats.**

Agriculture Victoria supports this recommendation, bearing in mind the recommendation to hold stock a minimum 7 clear days to acclimitise to feed etc. The inspection day should be the day after arrival, otherwise how can the AAV/AO confirm the arrival day if the goats are inspected some days after apparent arrival. There may be other ways to conform arrival, such as transport records, etc.

**11) Consistent with the Land Transport Standards 'Horned bulls should have the nonvascular tip removed to a diameter of three cm.'**

**a) Paragraph 1A.3.2 (b) should be replaced with a requirement that horned cattle must have the nonvascular horn tip removed to a diameter of three centimetres.**

Agriculture Victoria supports this recommendation.

**12) No change to paragraph 1A.3.3(b).**

Agriculture Victoria supports this recommendation.

**13) Paragraph 1A.3.5 (b) for goats with horns, should be amended to read .... 'If horned, with horns that are likely to restrict access to feed and water during transport and/or endanger other goats or stock handlers, the horns must be tipped to remove the points, with only the solid non-vascular horn cut.'**

Agriculture Victoria supports this recommendation.

**14) No removal of long horn management plans.**

Agriculture Victoria supports this recommendation.

**15) Change the requirement of paragraph 1A.3.4 (d)(v) to be geographic – all ports north of 20 degrees South**

Agriculture Victoria supports this recommendation.

**16) The provision of water to animals within a registered premise is under the domain of state or territory legislation and the Australian Animal Welfare Standards and Guidelines. Paragraph 2B.1 (c) to be deleted**

Agriculture Victoria supports this recommendation, bearing in mind it will be some time before the Cattle and Sheep Welfare Standards will be adopted into regulations in Victoria, and the standards only cover cattle and sheep.

**17) While ASEL 2B.6 (a) and (b) address issues that come under the domain of the Australian Animal Welfare Standards and Guidelines and may be considered as duplication, are considered fundamental to ASEL and are to be retained.**

Agriculture Victoria supports this recommendation.

**18) Appendix B contains shorter periods of curfew and travel before rest for animals to be exported. This is due to the cumulative stress of transport through the supply chain. Appendix B should be retained.**

Agriculture Victoria supports this recommendation.

**19) Paragraph 3A.3.2 (h) should be amended as follows:**

**a) 'For all sea voyages via the Suez Canal, the Cape of Good Hope, the Panama Canal or Cape Horn, or via any other route where the voyage is expected to be longer than 30 days, the statutory reserve of additional fodder that must be loaded must be increased to at least seven (7) days.'**

Agriculture Victoria supports this recommendation.