



REVIEW OF THE AUSTRALIAN STANDARDS FOR THE EXPORT OF LIVESTOCK: DEPARTMENTAL SUBMISSION—STAGE 1

The Department of Agriculture and Water Resources (the department) regulates the livestock export industry through the *Australian Meat and Live-stock Industry Act 1997*, the *Export Control Act 1982* and associated subordinate legislation. Through the Australian Standards for the Export of Livestock v. 2.3 (ASEL), the department sets out the requirements to ensure animals are fit to export and to manage the risks to livestock health and welfare throughout the export voyage. The current version of the standards was published in 2011.

We support an outcomes-based approach to the standards to facilitate continuous improvement and innovation in industry practices. This must be balanced with requirements that are clear, verifiable, and science-based to support consistent and effective regulatory activities.

The department is aware that there are several significant issues within the standards that may be raised by stakeholders, and which will require in-depth consideration to determine appropriate, evidence-based recommendations. Some of these issues have been previously identified through other review processes, including the 2013 ASEL review, Farmer review (2011) and the Keniry review (2003) and this information has been previously provided to the committee. However, the department also encourages the committee to consider incorporating other issues which could be easily and quickly resolved early within its workplan. Some examples of these issues have been included within this submission (for example, unclear definitions which could be clarified to provide clearer, consistent application of the standards).

Issue 1: Improving the format of ASEL

The proposed reformatted version of ASEL provides a clearer and more concise standards document that brings all the requirements of ASEL together into a single source while reducing its overall volume.

The department notes that, in order to make the standards ready for review, the proposed version incorporates requirements for export previously included in export advisory notices and in conditions applied to export consignments, as well as agreed items from previous ASEL reviews. The proposed document also excludes requirements now covered under the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock, previously found in Standard 2 of ASEL.

The department is satisfied that the proposed reformatted version of ASEL does not alter the regulatory impact upon exporters.

Issue 2: Improving ASEL content through a review work plan

The department suggests the committee considers the following three areas when developing their work plan to improve the standards:

1. Outstanding issues from the 2013 ASEL review

The following issues from the previous ASEL review are of particular importance to the department, and we believe these should be considered when developing the review workplan:

- Stocking densities on vessels
- Provision and management of bedding on board vessels including measurement of ammonia levels in sea exports
- Review of the minimum time cattle and buffalo must remain at a registered premise prior to export by sea, particularly for buffalo given the increase in buffalo exports (see Table 1).

Table 1 Total number of species exported per year since 2014

| | | 2014 | 2015 | 2016 | 2017 |
|----------------|--------------|------------------|------------------|------------------|------------------|
| Alpacas | Air | 712 | 1 113 | 243 | 1 801 |
| | Sea | 0 | 0 | 0 | 0 |
| | Total | 712 | 1 113 | 243 | 1 801 |
| Buffalo | Air | 3 | 25 | 0 | 0 |
| | Sea | 5 065 | 5 097 | 5 792 | 9 710 |
| | Total | 3 | 5 122 | 5 792 | 9 710 |
| Camels | Air | 40 | 123 | 61 | 67 |
| | Sea | 18 | 0 | 0 | 0 |
| | Total | 58 | 123 | 61 | 67 |
| Cattle | Air | 9 477 | 11 309 | 6 107 | 9 261 |
| | Sea | 1 281 911 | 1 301 361 | 1 136 352 | 857 795 |
| | Total | 1 291 388 | 1 312 670 | 1 142 459 | 867 056 |
| Deer | Air | 0 | 90 | 80 | 0 |
| | Sea | 0 | 0 | 0 | 0 |
| | Total | 0 | 90 | 80 | 0 |
| Goats | Air | 86 569 | 86 676 | 54 201 | 12 245 |
| | Sea | 154 | 1000 | 0 | 0 |
| | Total | 86 723 | 8 7676 | 5 4201 | 12 245 |
| Sheep | Air | 39 318 | 57 189 | 62 706 | 42 144 |
| | Sea | 2 235 872 | 2 014 516 | 1 775 321 | 1 845 272 |
| | Total | 2 275 190 | 2 071 705 | 1 838 027 | 1 887 416 |
| Total | Air | 136 119 | 156 525 | 123 398 | 65 518 |
| | Sea | 3 523 020 | 3 321 974 | 2 917 465 | 2 712 777 |
| | Total | 3 659 139 | 3 478 499 | 3 040 863 | 2 778 295 |

2. Other issues to consider

- Lack of discretion in pregnancy test requirements prior to export for all species, other than exemption from the requirement. Particularly in the discrepancies between minimum age/weight for some species as opposed to others, and the adequacy of current 30 day timeframes for testing given the trend towards increased pre-export quarantine periods in certain markets.
- Management of animals at the airport prior to loading of the aircraft, including access to water and shelter from the elements.
- Review descriptions of the veterinary medicines and equipment required on board

3. Greater clarification of terms

The department's role as regulator of the livestock export industry is reinforced by standards that clearly outline the government's requirements for the trade. Further clarification of some ASEL definitions would provide greater certainty and consistency in the application of the standards. Examples of definitions which could be clarified include the natural position of an animal for air shipments, requirements for horns and body condition scores.

The department encourages the committee to consider the issues identified in this submission when developing their review work plan. We would be pleased to provide further supporting information as required to assist the committee in its review process.