



RSPCA SUBMISSION

REFORMATTED ASEL & REVIEW PRIORITIES

20 March 2018

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1. Reformatted ASEL

Please see comments in Appendix 1.

2. Review priorities

Priorities for the next stages of the review should be based on greatest impact to animal welfare. With this in mind, the RSPCA would like to see the following issues addressed in the subsequent stages of the review.

a) Stocking densities

Review of the stocking density rates outlined in the ASEL is long overdue. The current requirements were developed with no validated scientific basis and fail to meet basic OIE standards (see OIE Animal Welfare Standards Chapter 7.2.5.7b, 7.2.5.8, 7.1.4.3, 7.9.5.2h). This is a major deficiency of the ASEL as stocking densities have significant implications for welfare outcomes. High stocking densities exacerbate levels of heat stress, inanition, morbidity, and mortality.

Current stocking density rates at registered premises and on-board ship fall well below allometric requirements and the threshold for adverse welfare outcomes. Stocking density rates should be consistent with allometric requirements for all animals to be lying down at the same time; for all animals to easily access food and water; for all animals to be able to move freely; for the identification of shy feeders; and for visual inspection of all animals.

b) Export to the Middle East from May to October

Evidence from Australian shipments demonstrates that mortality approximately doubles when sheep are transported from the Australian winter to the Middle Eastern summer (Phillips 2016). On average, mortalities are lowest in the first four months of the year, rise to a peak in August and remain above 1% until after October (Sheill et al 2013).

Over a decade ago, the Keniry Review (2004) recommended that 'exports should be banned in circumstances where the available evidence indicates that the risks of adverse outcomes are predictably high' (recommendation 6). Several years later, the Farmer Review (2011) recommended that a review of ASEL 'should inter alia examine the policy on export of sheep from southern ports to the Middle East in winter months, with a view to: mitigate feedlot and shipboard losses in adverse weather conditions; mitigate losses from heat stress and inanition during the voyage' (recommendation 6). Such review is long overdue.

Cattle are also affected by export during this period, especially *Bos taurus* breeds from southern ports.

It is acknowledged that slight adjustments for stocking density are provided for in the ASEL for this period of the year, however these adjustments fall short of providing adequate protection as the consistently higher rates of mortality demonstrate. Stocking density adjustments alone cannot protect animals from morbidity and mortality when temperatures approach or reach the heat stress threshold for the species concerned.

c) Independence of accredited veterinarians and scope of veterinary care

Live export accredited veterinarians are recognised in legislation and are required to perform the critical role of both managing the health and welfare of livestock during the export process and reporting to the Australian Government on health and welfare outcomes of the voyages. Currently, accredited veterinarians are contracted directly by the exporter. This arrangement places considerable control and power in the hands of the exporter and gives rise to real and perceived conflicts of interest on the part of the veterinarian. There have been several well publicised examples of exporters exerting undue influence over accredited veterinarians in the performance of their duties. Some examples were canvassed in the 2011 Farmer Review (pp.36-37).

The Keniry Review highlighted the problems with the appointment arrangements back in 2004, noting that it places accredited veterinarians ‘in a difficult situation’:

On the one hand, they are responsible to their employer and are required to perform as directed; on the other hand, they are responsible for performing regulatory functions but not given regulatory protection, nor are they subject to regulatory sanctions.

The Keniry Review considered whether this conflict could be overcome by amending the legislation to set out the roles and responsibilities of the veterinarians but concluded that:

the role of these ‘third party’ veterinarians is so critical to the integrity of the entire livestock export process that they should be contracted by AQIS and report directly to it, although exporters should continue to be responsible for the full cost associated with them.

The Keniry Review went on to make the following recommendation:

‘Third party’ veterinarians responsible for the treatment and preparation of animals for export must be directly contracted and accountable to AQIS in the performance of their duties:

- they must be registered with a state veterinary board;
- their responsibilities must be referenced in export legislation with suitable penalties for any breach;
- livestock exporters should be allocated a ‘third party’ veterinarian by AQIS at the time they advise AQIS that they intend to export; and
- livestock exporters should pay all costs associated with the services of these veterinarians.

This is also consistent with the policy of the Australian Veterinary Association which states that shipboard veterinarians “Where live export occurs, an Australian-registered shipboard veterinarian must accompany each shipment and this veterinarian must be independent and thus not employed by either the exporting company or the shipping company” ([AVA 2016](#)).

The extent of veterinary care and supervision available should be proportionate to the risk of the journey and the number of animals carried. At present, standard arrangements are that no veterinarian is present on short-haul voyages and only one veterinarian travels per shipment regardless of the number or type of animals carried, the number of decks requiring supervision, or the relative risk of the journey. The review should re-examine this approach and ensure that provision of veterinary care is appropriate for each individual journey.

The role performed by accredited veterinarians is critical to the integrity of the live export trade. The current arrangements for their appointment are not appropriate and are long overdue for review.

d) Reducing reportable mortality levels & triggers for Departmental investigations

Mortality reporting thresholds are unchanged from previous legislative requirements despite agreement for annual review. These thresholds should be reduced as average mortalities reduce. For example, the average mortality rate for sheep voyages by sea is 0.74%. Over the past five years, 33 voyages have recorded mortality rates of over 1%, yet only 3 of these have triggered an investigation. The lack of information on the causes of above average mortality makes it difficult to recommend actions that might lead to further reductions in mortality rates. A review of the reportable rate should also involve consideration of what data need to be collected during a journey when mortalities are occurring, the data required by the Department for an investigation, and consideration of auditing a proportion of all voyages with above average mortality rates. Consideration also needs to be given to reportable events and investigation triggers that go beyond blunt measures of mortality, including more sophisticated measures of morbidity.

e) Heat stress risk assessment

Heat stress is still a significant cause of on-board deaths and morbidity. Otherwise prohibited high risk voyages can be approved by the Department upon receipt of an agreed heat stress risk assessment (see, s.1A.3.2). The heat stress model must be referenced in the standards and subject to independent and ongoing assessment. The current heat stress model is an industry-developed model that has not been independently validated, is not publicly available for scrutiny, has not been published in a peer-reviewed scientific publication and is therefore of unknown quality. The main output of the heat stress risk assessment is predicted mortality; it does not provide an assessment of the risk to livestock of morbidity or other welfare measures.

f) High risk exports of vulnerable animals

Standards for the export of particularly vulnerable categories of livestock require review to ensure that the necessary additional safeguards are in place, and in cases where such safeguards are not possible, that export of such categories of livestock is prohibited. Vulnerable categories of livestock include:

- fat *Bos taurus* cattle;
- young lambs and goat kids;
- feral goats;
- entire males, especially goats and dairy bulls;
- all deer, camels, and alpacas; and
- all pregnant animals.

These categories of livestock have special requirements and vulnerabilities that necessitate additional safeguards for their welfare. Current requirements in the ASEL are insufficient and are not based on relevant scientific evidence.

g) Sourcing and preparation of livestock for export

Standards for critical livestock sourcing and preparation requirements have significant implications for welfare outcomes on-board ship and post disembarkation. Critical sourcing and preparation issues in need of review include:

- The minimum time off shears for sheep prior to export;
- The minimum time for livestock to be at registered premises prior to export;
- Rejection criteria and individual inspection processes; and
- Pregnancy testing processes.

These and other issues relating to the sourcing and preparation of livestock were examined in the 2012 Report of the Review of the Inspection Regime Prior to Export of Livestock from Fremantle Port. The recommendations of this report should be progressed as part of the current review process.

h) Provision and management of on-board bedding

Lack of appropriate bedding material for livestock during export, particularly for cattle on long haul voyages, gives rise to significant welfare impacts. Livestock can suffer from soft tissue injuries, sores and abrasions as a result of prolonged lying and rising attempts on abrasive decking. The ability to rest on a dry and comfortable surface should be a minimum standard for journeys. The bedding requirements in the ASEL are insufficient to mitigate risks and ensure acceptable welfare outcomes. These requirements are in need of review with a view to increasing bedding and bedding management requirements.

3. Independent scientific review

We would also like to reiterate the importance of the review process including an independent scientific literature review. A critical component of any animal welfare standard setting process is ensuring that stakeholder deliberations and committee decisions are informed by a strong and credible scientific basis. This scientific basis should be established via an independent literature review. This is an essential first step in any animal welfare standard setting process to separate out questions of science from questions of policy, ethics, economics, and other considerations. If processes do not allow for sufficient separation between these questions, the scientific basis of the standards can be lost through conflation with non-scientific issues.

Simply reviewing the submissions and information provided by stakeholders and the public is not sufficient. This is problematic for two reasons:

1. the scope of the scientific information considered in the review should not be limited to that provided by ASEL Reference Group members and the public; and
2. the TAC consists of members who have expertise in areas other than animal health and welfare, therefore, any consideration of animal welfare science by the TAC as a whole risks conflating questions of animal welfare science with other factors such as commercial feasibility.

Instead, we strongly recommend the Australian Government commission independent animal welfare scientists to conduct literature reviews of relevant peer-reviewed science for each module of the standards review (with the exception of the initial stage) and prior to ASEL Reference Group meetings on such modules. The literature review should then be circulated to ASEL Reference Group members without prior amendment or editing by the TAC, and be released as part of the public consultation documentation. This will ensure ASEL Reference Group members and the Australian public have a strong and credible scientific basis to inform their submissions to the draft standards.

An example of an independent animal welfare scientific review may be found in the Victorian Government's recently commissioned review of poultry welfare science to inform its position on the draft Australian Standards and Guidelines for the Welfare of Poultry. The Victorian Government commissioned Bristol University researchers to undertake the review in 2017. The review was also peer-reviewed by additional researchers from Australia and New Zealand and then published on Agriculture Victoria's website for the Victorian Government, poultry stakeholders, and the Australian public to refer to in forming their position on poultry welfare issues of concern.

Another example can be found in the recently commissioned review of pig welfare science by Australian Pork Limited (APL). As part of the national review of the Model Code of Practice for the Welfare Pigs, APL commissioned several researchers from the Animal Welfare Science Centre to review the relevant international scientific literature around pig welfare. The review Terms of Reference made the following important distinction between peer-reviewed published literature and industry research reports:

The focus of the scientific review should be on peer-reviewed published papers. Reports from funding organisations or other organisations can be noted but the emphasis should be on independently peer-reviewed research to inform the Australian Standards and Guidelines for Pigs.

Another important feature of this review relates to its timing. It is happening *prior to* the development of the draft standards and stakeholder meetings. This is important to ensure the drafting group and stakeholders have a strong scientific reference point for drafting the standards and engaging in deliberations.

In addition to these recent Australian examples, there are numerous reviews that can be pointed to throughout Europe, New Zealand, and Canada, which demonstrate the need for, and the routine nature of, undertaking independent scientific reviews to inform the development of animal welfare standards.

To summarise, an independent scientific review should be:

- a) conducted by researchers who are sufficiently qualified and independent of the interests of any stakeholders;
- b) based on peer-reviewed published literature, not industry research reports;
- c) undertaken prior to the development of the drafting process and stakeholder advisory meetings; and
- d) circulated to stakeholders and published in an un-edited form.

We understand that such reviews require time and resources but this is not expected to be significant. While it is incumbent upon Government to fund essential components of good standard-setting practice, in the event that Government claims to be unable to fund the proposed scientific reviews to the extent required, we reiterate our previous offer to provide the necessary funds to ensure such a review takes place.

The review of the ASEL will be contentious. Commercial and animal welfare considerations will come to the fore and different interests and value sets will inevitably come into conflict. It is therefore critical to the integrity of the process that questions of science remain independent of other considerations. As discussed above, independent scientific reviews are a routine feature of animal welfare standard-setting processes in many other developed nations. Considering the profile and community interest in the live animal export trade, we expect a similar standard to apply to the ASEL review process.

4. Supporting documentation

In addition to considering the findings of an independent scientific review, we recommend the TAC obtain and consider the following documentation:

- All previous documents and submissions made to the 2012 ASEL review
- The Fremantle Review Report 2013
- Published and unpublished industry funded R&D reports
- Department Reportable Mortality Investigation reports
- Relevant peer-reviewed published literature

References

Australian Veterinary Association (2016) Live Animal Export Policy, 29 July, available at:
<http://www.ava.com.au/policy/151-live-animal-export>

Farmer, B (2011) Independent Review of Australia's Livestock Export Trade

Keniry, J et al. (2003) Livestock Export Review

Phillips, C (2016) The welfare risks and impacts of heat stress on sheep shipped from Australia to the Middle East. *The Veterinary Journal*, 218: 78-85

Sheill, K, Perkins, N & Hewitt, L (2013) Review of ASEL Scoping Study - Export of sheep from southern ports to the Middle East in winter months. LiveCorp/MLA, W.LIV.0284

Appendix 1 - Comments on the reformatted ASEL

Reformatted ASEL		
Standard	Text	RSPCA comments
Appropriately segregated	<p>Livestock of the following types must be segregated in different lines/pens:</p> <ul style="list-style-type: none"> • animals of different species • animals of the same species sourced for different end purposes, i.e. feeder animals must be segregated from breeder animals of the same species • young animals from older animals • animals of a dissimilar size • any animals covered by an ESAL management plan from those that aren't covered by an ESAL management plan • camels of different sexes. 	Include bulls and heifers
Livestock Services	Any equipment, processes and systems necessary to ensure the health and welfare of livestock throughout the entire export chain, which may include but are not limited to feed and water supply systems, ventilation monitoring on aircraft and ships and the washing down of decks and disposal of faeces on a ship.	Include electronic data loggers
Voyage	In maritime law, the time of a vessel's transit from one place to another.	As the term 'voyage' is used in the ASEL exclusively in the context of live animal export, the definition of 'voyage' should include the time taken for the loading and discharge of the animals

<p>Water deprivation time</p>	<p>The time that animals can be deprived of access to adequate water of a quality to maintain good health and welfare. Water deprivation time is the total continuous period of water deprivation, starting when all animals last had access to water. Each of the below must be included when calculating the total water deprivation time with respect to transport journeys:</p> <ul style="list-style-type: none"> • time off water during mustering • time off water when yarded after mustering • curfew • all time on the transport vehicle, whether moving or stationary, and • any time without water after unloading, such as at a saleyard, spelling centre or registered or approved premise. 	<p>Include 'during unloading' in the last dot point</p>
<p>1A.1</p>	<p>Animals must meet the importing country requirements. Livestock sourced for export must meet the requirements set out in the applicable importing country protocol and import permit, such as sex, breed, and property clearances etc. Livestock must be inspected on-farm and any animal that do not meet the importing country requirements is not fit for export. Animals that are not fit-for-export must, in accordance with outcome 1B, not be prepared for export.</p>	<p>This text is different to that in the draft reformatted ASEL document.</p>
<p>1A.2.1</p>	<p>Rejection criteria—All livestock Animals that meet any of the following rejection criteria are not fit-for-export:</p> <p>(a) Livestock must not be sourced or prepared for export if they are showing signs consistent with any of the following rejection criteria:</p> <ul style="list-style-type: none"> (i) emaciated or over-fat body condition in accordance with the body scores in Appendix A (ii) anorexia (inappetence) (iii) unwell, lethargic, dehydrated (iv) uncoordinated, collapsed, weak (v) ill-thrift (vi) un-healed de-horning or tipping wounds (vii) lactating, unless with calves at foot and being transported by air (viii) lameness or abnormal gait (ix) abnormal soft tissue or bony swellings (x) dysentery or profuse diarrhoea (xi) bloat (xii) neurological symptoms (head tilt, circling, Incoordination) (xiii) abnormal or aggressive behaviour/intractable or violent (xiv) generalised and extensive buffalo fly lesions 	<p>This is 1A.3.1 in the draft reformatted ASEL document.</p>

<p>(xv) generalised skin disease (xvi) generalised papillomatosis or generalised ringworm, dermatophilosis (xvii) visible external parasites (xviii) significant lacerations (xix) discharging wounds or abscesses (xx) cutaneous myiasis (flystrike) (xxi) ballanitis (pizzle rot) (xxii) blood/discharge from reproductive tract (vulva/prepuce) (xxiii) blindness in one or both eyes (xxiv) cancer eye (xxv) keratoconjunctivitis (including pink eye) (xxvi) scabby mouth (xxvii) excessive salivation (xxviii) nasal discharge, the cause of which may affect the health or welfare of the livestock (xxix) severe coughing, or (xxx) respiratory distress—difficulty in breathing.</p> <p>(b) In addition to the above, all livestock with horns must not be sourced or prepared for export if they have any of the following: (i) untipped sharp horns (horns must be blunt) (ii) horns that are turned in so as to cause damage to the head or the eyes (iii) horns that would endanger other animals during transport, or (iv) horns that would restrict access to feed or water during transport.</p> <p>(c) Female livestock must not be treated with a prostaglandin drug within 14 days of export, and not during the 60 day period before export unless they have been pregnancy tested immediately before prostaglandin treatment and declared to be in the first trimester of pregnancy or not detectably pregnant.</p> <p>(d) Mobs with unusual mortalities over the whole period of pre-export isolation are not fit-for-export and the whole mob must be rejected.</p> <p>(e) In addition, for export by air, all eligible pregnant livestock or livestock that have given birth in the last 48 hours are not fit-for-export unless accompanied by a veterinary certificate certifying the animal is fit to travel and there is no evidence of imminent parturition.</p>	<p>Include ‘probability of or’ before ‘evidence of imminent parturition.’</p>
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	(f) Animals intended to be exported for human consumption must comply with Australian food safety requirements, including standards for chemical residues or environmental contaminants.	
1A.2.4	<p>Rejection criteria—Sheep</p> <p>Further to 1A.2.1:</p> <p>(a) all sheep much have been weaned for at least 14 days prior to sourcing for export.</p> <p>(b) if horned, sheep must have horns no longer than one full curl.</p> <p>(c) all female feeder or slaughter sheep over 40 kg and all Damara female sheep must have been determined to be not detectably pregnant and tested in accordance with the requirements of a valid pregnancy test.</p> <p>(d) For export by sea, all sheep must:</p> <p>(i) a liveweight of more than 28 kg</p> <p>(ii) have fibre not more than 25 mm in length</p> <p>(iii) either be:</p> <p>A. 10 days or more off shears when sourced, or</p> <p>B. be shorn during the 10 day period before export and accommodated in sheds on the registered premises.</p> <p>(iv) if female breeder sheep, be determined to be no more than 100 days pregnant at the scheduled date of departure and tested in accordance with the requirements of a valid pregnancy test.</p> <p>(v) not be sourced for export from or through the ports of Darwin, Weipa or Wyndham from 1 November to 31 May in the following year (inclusive).</p> <p>(e) For export by air sheep must have a liveweight of more than 20kg. In addition:</p> <p>(i) all female breeder sheep over 40 kg must have been determined be no more than 115 days pregnant at the scheduled date of departure and tested in accordance with the requirements of a valid pregnancy test.</p>	<p>This is 1A.3.4 in the draft reformatted ASEL document.</p> <p>Spelling error – change ‘much’ to ‘must’.</p>

<p>1B.2</p>	<p>Inspection for export by sea</p> <p>(a) In addition to the inspection requirements of the Land Transport Standards, at a minimum livestock to be exported by sea must be inspected by a competent person familiar with the requirements of the consignment (unless otherwise specified) to determine if the animals remain fit to export:</p> <ul style="list-style-type: none"> (i) upon the animals being unloaded into a registered premise (ii) daily whilst the animals are in the registered premise by a competent stock person (iii) prior to inspection by an authorised officer, and (iv) immediately prior to the animals being loaded onto the vessel. <p>(b) If goats are to be exported by sea on a short haul voyage, they must be inspected at the registered premises by an authorised officer on at least two (2) occasions during preparation to confirm the goats have been held in the registered premise for five (5) days and fed appropriately as per Appendix D.</p>	<p>This is 1A.1.1 in the draft reformatted ASEL document.</p> <p>Insert 'individually' before 'inspected' as outlined in S3.13 of current ASEL.</p> <p>Insert 'species' after 'consignment'</p>
<p>1B.3</p>	<p>Inspection for export by air</p> <p>In addition to the inspection requirements of the Land Transport Standards, to be exported by air livestock must be inspected by a competent person familiar with the requirements of the consignment (unless otherwise specified) to determine if the animals remain fit to export at a minimum:</p> <ul style="list-style-type: none"> (a) upon the animals being unloaded into a registered premise (b) daily whilst the animals are in the registered premise, and (c) once loaded, immediately prior to the departure of the aircraft. 	<p>This is 1A.1.2 in the draft reformatted ASEL document.</p> <p>Insert 'individually' before 'inspected'</p> <p>Insert 'species' after 'consignment'</p>
<p>2B.6</p>	<p>Animals are loaded and unloaded safely</p> <p>In addition to the requirements of the Land Transport Standards, to ensure animals are loaded and unloaded safely:</p> <ul style="list-style-type: none"> (a) Livestock must be expediently loaded and unloaded by a sufficient number of competent stock handlers in a manner that prevents injury, minimises stress and ensures that livestock husbandry and welfare needs are addressed. (b) During every specified rest period within Appendix B or the Land Transport Standards, sheep and goats of all ages must: <ul style="list-style-type: none"> (i) be unloaded (ii) have access to food and adequate water of a quality to maintain good health, which may be withdrawn during the curfew period of up to a maximum of 8 hours before reloading, and (iii) have enough space for exercise and rest. 	

	<p>(c) Dogs must be muzzled at port and the number of dogs used should be the minimum necessary to complete the task.</p> <p>(d) Animals must not leave the registered premises until AMSA, Department of Agriculture and Water Resources (sea ports) and the master of the vessel have determined that the vessel is in a fit state for the vessel to load stock before departing.</p> <p>(e) For export by sea: (i) Deer must be loaded onto the ship through raceways with solid walls, such as plywood, preferably at least two (2) meters high (ii) When camels are loaded onto the ship, the clearance between the hump and the deck of the ship must be at least 100 millimetres.</p>	<p>Insert 'be loaded onto trucks to' before 'leave'</p>
3A.2	<p>Animals are accompanied by appropriate veterinary medicines and equipment Vessels must: (a) carry appropriate veterinary medicines and equipment sufficient for the species and number of livestock carried, as specified in Appendix F</p> <p>(b) store veterinary medicines accordance with veterinary directions and manufacturer's recommendations, and</p> <p>(c) carry appropriate restraint equipment as specified in Appendix F.</p>	<p>Insert 'and use' after 'store' Insert 'in' after 'accordance'</p>
3A.3.2	<p>Feed At the time of departure, the vessel must hold at least the quantity of feed to meet the anticipated needs of the animals: (a) The vessel must also hold the statutory reserve amounts, as specified in Appendix G.</p> <p>(b) Non-pelleted feed must not contain more than 30% by weight of wheat, barley or corn. If the animals have adapted to feed with a greater percentage of wheat, barley or corn for at least than 2 weeks prior to loading, this feed may be used on-board.</p> <p>(c) Fodder for cattle exported from an Australian port south of latitude 26° south must include at least 1 per cent of the required feed as chaff and/or hay.</p>	<p>Delete 'than' before '2 weeks' Insert 'without concurrent access to supplementary roughage such as hay' after 'loading'.</p>

	<p>(d) Pelleted feed must be accompanied by a manufacturer's declaration that states it is manufactured in accordance with national pellet standards as specified in the Australian Code of Good Manufacturing Practice for the Feed Milling Industry, October 2002, and available for downloading from the website of the Stock Feed Manufacturer's Council of Australia, at www.sfmca.com.au.</p> <p>(e) Pelleted feed for sheep, goats and camelids must also meet the nutritional requirements in Appendix G.</p> <p>(f) Feed from a previous voyage may remain in a feed storage tank provided that:</p> <ul style="list-style-type: none"> (i) Each tank is completely emptied at least once every ninety (90) days (ii) All feed that is no longer suitable for livestock consumption is emptied in its entirety before further suitable feed is loaded, and (iii) Records are maintained of the emptying of feed storage tanks. <p>(g) For deer, where concentrates are fed, the concentrates should be included at a ratio of 1:4 with the roughage.</p> <p>(h) For all voyages travelling through the Suez Canal, a statutory reserve of at least seven (7) days additional fodder must be loaded.</p>	
3A.5	<p>Contingency plans to ensure the safe carriage and maintenance of the animal's health and welfare during export are prepared.</p> <p>(a) Contingency plans for the following emergencies must be prepared for each consignment:</p> <ul style="list-style-type: none"> (i) emergencies and interruption during loading, including procedures for contacting the exporter in the event of an animal health or welfare emergency (ii) mechanical breakdown of the vessel or aircraft (iii) rejection of the consignment by the importing country, and (iv) For export by air: <ul style="list-style-type: none"> A. unavailability of the aircraft to be used for the air transportation, and B. livestock are unable to be loaded onto the aircraft. (v) For export by sea: <ul style="list-style-type: none"> A. a feed or water shortage during the voyage B. an outbreak of disease during the voyage, and C. extreme weather conditions during the voyage. <p>(b) The contingency plan under 3A.5(a)(v)A. for a shortage of feed, must include:</p>	

	<p>(i) Adequate means to match the fodder already on-board the vessel to prevent on-board mortalities, and</p> <p>(ii) Advising the importer of any fodder shortages that occurred during the voyage and assisting the importer with details of the fodder composition and transitioning onto local fodder.</p> <p>(c) The contingency plan under 3A.5(a)(v)A. for a shortage of feed, must consider:</p> <p>(i) the time required to manufacture fodder that matches the composition of that on-board if the voyage length is extended and additional fodder must be sourced</p> <p>(ii) the time and amount of existing fodder required to successfully transition to fodder of a different composition</p> <p>(iii) importing country requirements for the origin of the fodder, and</p> <p>(iv) availability and access to suitable fodder along the voyage route.</p>	<p>Insert 'or are occurring' after 'occurred'</p> <p>Insert 'or access' after manufacture</p>
3B.3	<p>Animals are provided appropriate ventilation</p> <p>To ensure animals have appropriate ventilation whilst on the export voyage:</p> <p>(a) For export by sea:</p> <p>(i) When livestock are loaded on vessels with enclosed decks, the ventilation system must be run continuously from the commencement of loading.</p> <p>(ii) Ventilation must be monitored daily to ensure adequate thermoregulation of the livestock.</p> <p>(b) For export by air: when the aircraft carrying livestock is on the ground (whether moving or stationary), the operator of the aircraft must ensure that ventilation and temperature in the livestock hold is adequate to maintain all of the animals' health and welfare.</p>	<p>Replace 'daily' with 'continuously'</p>
3B.5	<p>Animals are managed by sufficient competent personnel</p> <p>The on-board management of livestock for export by sea must ensure the health, welfare and physical needs of livestock are met during the voyage:</p> <p>(a) An accredited stock person must accompany each consignment of livestock and must remain with the consignment until the vessel has completed discharging at the final port of discharge.</p> <p>(b) An accredited veterinarian must accompany each consignment of livestock where required by the relevant Australian Government agency and must remain with the consignment until the vessel has completed discharging at the final port of discharge.</p> <p>(i) Accredited veterinarians must accompany consignments by sea that are:</p> <p>A. travelling to or through the Middle East</p> <p>B. undertaken upon new or recently renovated vessels, or</p> <p>C. the first consignment for an exporter.</p>	

	<p>(ii) The accredited veterinarian and accredited stock person may be the same person if that person holds both current accreditations.</p> <p>(c) Accredited stockpersons and accredited veterinarians must work with the vessel's Master and crew to ensure and maintain the health and welfare of the livestock on-board.</p> <p>(d) All personnel handling and caring for livestock or who are otherwise responsible for animals during the voyage must be able to demonstrate an adequate level of experience and skill to allow them to undertake their duties.</p> <p>(e) Pregnant livestock must be accompanied by an accredited stockperson with experience with pregnant livestock.</p>	<p>Insert 'and the consignment is under 2,500 head of cattle or 50,000 head of sheep' after 'accreditations.'</p> <p>Replace 'stockperson' with 'veterinarian'</p>
3B.7	<p>Animals that do not maintain their health and welfare status receive appropriate, prompt and humane handling and care.</p> <p>(a) For export by sea, any livestock identified after loading as being distressed, sick or injured must:</p> <p>(i) be transferred to a hospital pen, if required</p> <p>(ii) be given immediate appropriate treatment</p> <p>(iii) if required to be treated using veterinary medicines or equipment the usage must be in accordance with veterinary directions and manufacturer's recommendations</p> <p>(iv) if necessary, be safely and humanely euthanised without delay</p> <p>NOTE: See the Australian Animal Welfare Standards and Guidelines, Standard 6—Humane Destruction, for recommended euthanasia practices.</p> <p>(v) If an accredited veterinarian is on-board a vessel that is carrying sheep and any animals on-board are showing signs of scabby mouth, the veterinarian must supervise the separation of these animals.</p> <p>(b) For export by air, any livestock for export identified during transport by air as being distressed, sick or injured must, where feasible:</p> <p>(i) be given immediate appropriate treatment</p> <p>(ii) if necessary, be safely and humanely euthanised without delay</p> <p>(iii) arrangements must be made to remove or separate sick or dead livestock from pens carrying multiple animals in transit. If animals need to be off-loaded, arrangements must be made to ensure the health and welfare of the animals.</p>	<p>Insert 'or carry out' after 'supervise'</p> <p>Suggest (iii) is a new paragraph (c) as it does not currently follow from (b).</p>
Counting days	<p>For the purposes of calculating the number of days an activity was conducted before export, the day the activity was performed (i.e. sheep shorn, test conducted or sample taken) is considered to be day zero and</p>	

	<p>the day of loading of the animal is counted as the last day. For example, if a heifer was pregnancy tested on 1 July, day zero is 1 July and the day of loading must be no later than 31 July to meet the valid pregnancy test requirements of testing during the 30 day period.</p> <p>For the purpose of counting clear days in a registered premise, exclude the first day (arrival day) and last day (departure day).</p> <p>When counting journey time, the time begins upon the loading of the first animal onto the mode of transport (i.e. truck) and finishes when the last animal is discharged (i.e. into the registered premise).</p> <p>The time for a voyage is calculated from completion of loading in Australia until anticipated arrival at the first port of discharge overseas.</p>	<p>How does this interact with the definition of ‘voyage’ above? The time for a voyage should be consistent with journey time, that is, the time should begin upon the loading of the first animal onto the vessel and end when the last animal is discharged overseas.</p>
<p>Appendix E— Portable Livestock Unit (PLU) requirements</p>	<p>The requirements within this Appendix applies where PLUs are used to transport livestock exported by sea.</p> <p>(a) The maximum number of PLUs per voyage/consignment is 5 (not including 1 additional empty PLU, if a PLU is to be used as a hospital/isolation area).</p> <p>(b) The stocking density within the PLU must be set in accordance with the minimum stocking densities within this standard, with an additional 15% space allocation to account for the following as necessary:</p> <ul style="list-style-type: none"> (i) species and class; (ii) size and body condition; (iii) wool or hair length; (iv) horn status; (v) predicted climatic conditions; (vi) design and capacity of the PLU. <p>(c) An appropriate hospital/isolation area must be available, and must be clearly stated in the exporter’s standard export plan, as a means of segregating livestock if required. This can be either:</p> <ul style="list-style-type: none"> (i) divider rails (any); (ii) an additional empty PLU, along with the required equipment or facilities to move livestock safely between PLUs. 	<p>Insert ‘and readily accessible’ after ‘available’</p>

NOTE 1: Any division within a PLU must comply with the requirements of Marine Orders Part 43.

NOTE 2: If an additional empty PLU is used as the means of segregating livestock, details of livestock (stud) that are capable of being “led” between PLUs, or of a sheep trolley or portable panels, must be included within the consignment inventory.

(d) PLUs must be adequately equipped to provide shelter and shade (shade-cloth and tarpaulins). The accredited stock person or accredited veterinarian must take action before or during extreme weather conditions to minimise the risk to the welfare of livestock.

(e) The floor surface of a PLU must be non-slip and non-abrasive.

NOTE: This can be achieved through the use of sufficient and suitable bedding material for the class and species of livestock to be transported.

(f) For cattle, bedding material (kiln-dried sawdust/shavings or equivalent) must be applied at a minimum of 4 kg per m² before loading.

(g) Soiled bedding material must be replaced as necessary (subject to type and species).

(h) The consistency and depth of bedding material must be continually monitored.

(i) Bedding management must minimise abrasions, lameness, pugging, faecal coating and ammonia production.

(j) The placement and securing of PLUs on-board the vessel must be:

(i) done in accordance with sections 34 and 35 of the Marine Orders Part 43; and

(ii) done in a way approved by a surveyor appointed under the Navigation Act 2012.

(k) PLU’s must not be stacked on top of each other.

(l) Each PLU must be stowed in a position that allows direct access to the PLU.

	<p>(m) Feed and water must be managed in accordance with the requirements within this standard and the Marine Orders Part 43 with adequate storage space; and with sufficient protection from weather.</p> <p>(n) The vessel must have adequate capacity to desalinate water or sufficient water storage on-board.</p>	
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