



Department of
**Primary Industries and
Regional Development**

GOVERNMENT OF
WESTERN AUSTRALIA

Mr Steve McCutcheon
Chair, Technical Advisory Committee
Review for the Australian Standards for Export of Livestock
GPO Box 858
CANBERRA ACT 2600

Dear Mr McCutcheon,

Issues Paper: Review of the Australian Standards for the Export of Livestock: Air Transport

The Department of Primary Industries and Regional Development (the Department) welcomes the opportunity to contribute to the Issues Paper: Review of the Australian Standards for the Export of Livestock (ASEL): Air Transport. The Department recommends that changes to the ASEL be based on science, and supports further research into areas where needed. Comments below relate to specific sections in the issues paper and are numbered accordingly.

3.1. Live weight and body condition score for livestock exported by air

The Department supports the implementation of a consignment specific management plan for those breeds of livestock who do not conform to the average weights/criteria existing under ASEL e.g. miniature breeds.

The Department also recommends that the minimum duration between weaning of lambs and export be increased to at least three weeks and that the standard for minimum live weight of sheep exported by air be increased from 20kg to 24kg. Small increases in weaning weights have a significant positive effect on survivability and lambs need longer than two weeks to recover from weaning and be robust enough for export. Lambs should also be at least condition score two when sourced for export. Lambs less than this have either nutritional stress or a health issue that needs to be managed pre export.

It is suggested that the minimum weights for other species be revised in accordance to the latest research.

**OFFICE OF THE DEPUTY DIRECTOR GENERAL
Sustainability and Biosecurity**

Gordon Stephenson House, 140 William Street, Perth WA 6000
Locked Bag 39, Cloisters Square WA 6850

Telephone +61 (0)8 6552 4444 Facsimile +61 (0)8 9482 7389 enquiries@dpird.wa.gov.au
www.dpird.wa.gov.au

ABN: 18 951 343 745

3.3 Pregnancy testing requirements

The maximum days of gestation are not appropriate for cattle and buffalo and may not be for other species. The current maximum days of gestation at scheduled date of departure for cattle is 250 days. This means that cows can be exported up to 32 days before the expected calving date. Whilst the Department acknowledges that calving may not be imminent, there is a higher risk of negative health and welfare issues arising (such as hypercalcemia) during transport in the last trimester. The Department suggests avoiding export during the last trimester.

3.4 Non-farmed livestock

The Department agrees that non-farmed livestock must be appropriately backgrounded prior to export. Animals must be conditioned to handling and eating and drinking from troughs prior to export. It is suggested that the Standards include provisions to remove individual animals who are not acclimatising within the required period.

3.5 Vulnerable or special classes of livestock

Livestock with young at foot have specific requirements that need to be met to ensure their safety and welfare during sourcing and air transport. The term "young at foot" must be defined in the Standards. At a minimum young must be able to walk, feed and thermoregulate.

The Department supports a provision for a consignment specific management plan for high risk animals such as those with young at foot. Where practical, the management plans should be aligned with the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock for operational consistency. The Department discourages the export of livestock that have given birth within 48 hours of export, even with a veterinary certificate certifying animals are fit to travel.

3.7 On farm preparation of livestock

The Department supports the inclusion of a maximum travel time between premises where the animals are being prepared and the airport. Consideration should be given to the amount of time animals are spent on trucks at the airport due to unforeseen delays such as departure of the aircraft.

The suggestion that livestock transported by air need to be prepared at a registered premise requires sound scientific justification. The role of a registered premise for livestock transported by sea is largely for the purpose of backgrounding so animals become accustomed to a feedlot environment, changes in feed and animals who are not acclimatising can be identified and removed from the consignment. Livestock export journeys by air are significantly shorter than livestock export journeys by sea (hours vs days/weeks). Whilst the Department acknowledges time spent at a registered premise is essential for livestock exported via sea, it questions whether time at a registered premise is needed for air transport and recommends any decision relating to this matter be based on the latest scientific research.

4 Penning arrangements and crate design

Consideration must be given when segregating and penning animals. Factors such as species, class and size, general health of the animal and level of aggression should be considered prior to penning and crating for air transport. Penning/crating of animals for transport from different properties is generally not recommended unless animals are backgrounded first.

6 Inspection of livestock

Animals being held at a registered premise prior to export can be inspected for health and injuries. As livestock exported by air do not have this requirement, it is suggested that all animals destined for export via air are inspected prior to loading onto the truck for transport to the airport and then again immediately prior to being loading onto the aircraft. Animals which

are travelling on the main deck of a freighter aircraft should also be manually inspected as soon as the aircraft doors are shut and as soon as possible after the aircraft lands. Animals travelling in the cargo hold of a passenger aircraft should be inspected as soon as possible the aircraft lands.

Whilst the Department acknowledges that manual inspection of animals inflight may cause further stress and have a negative effect on animal welfare, it still considers inflight inspection essential. Alternatives to manual inspection such as video monitoring should be utilised during flight. That way a general health and welfare assessment can be conducted without disturbing the animals. Technology such as real time monitoring should also be used to monitor the animals on board environment. Essential environmental conditions such as cabin pressure, ventilation, humidity, temperature and lighting must be monitored during flight and included in reporting requirements. Arrangements must be made to remove or separate sick or dead livestock from others as soon as possible.

7 Reporting requirements

The Department suggests that reportable mortality rates for livestock transport by air be consistent with the rates for livestock transport by sea.

The Department recognises the importance placed on animal welfare by the general community and considers it essential that the proposed changes to the ASEL are reflective of the current scientific understanding of animal welfare. We support a more efficient and transparent system to allow for the effective regulation of the ASEL.

Yours sincerely



HEATHER BRAYFORD
DEPUTY DIRECTOR GENERAL

14/5/2019