

18 July 2019

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

By email: TACsecretariat@agriculture.gov.au

Dear Committee members

ASEL Review - Air Transport Draft Report

Thank you for the opportunity to comment on the ASEL Review - Air Transport Draft Report.

We are disappointed the literature review for Stage 3 was not released publicly to inform this public consultation process as was expected. Without the literature review we have been unable to provide the level of detailed comment we otherwise would have preferred.

Nevertheless we trust that our comments will be of assistance to the Committee and look forward to receiving the Final Report and literature review in due course.

Yours sincerely,



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RSPCA Australia submission

Stage 3: Draft Report - Review of the Australian Standards for the Export of Livestock - Air Transport

1.3	Conduct of the review
Table 1	Please amend the number of submissions received to the Draft Report on ASEL sea transport to reflect the additional 6,623 individuals who made submissions to the public consultation. Each of these submissions contained personalised content and data on the identifying particulars of each individual was provided to the Department. They should therefore be counted as the individual submissions they are and recorded as such.
2	SOURCING AND PREPARATION
2.1	Liveweight and body condition score for livestock exported by air
	We are disappointed to see no proposed increase to minimum live weights.
2.2	Sourcing of deer and camelids
	<p>We are disappointed to see no proposed requirement for consignment-specific management plans for deer and camelids and no prohibition on the export of wild-caught deer. The requirements for exporting deer and camelids by air should be governed by a combination of specific ASEL standards and consignment-specific management plans.</p> <p>The ASEL should prohibit the export of wild-caught (feral) deer and camelids due to the increased stress to the animals and risks to health and welfare. Deer in particular are extremely stressed during transport (as noted in 3.2.2 of the Issues Paper) and should not be transported unless they are habituated to humans and captivity (i.e. reared on farm).</p>
2.3	Pregnancy testing requirements
	<p>We support recommendations 6 and 7.</p> <p>However, we recommend a requirement that animals be certified in writing as no more than a maximum of 180 days pregnant for cattle, 200 days pregnant for buffalo, and 99 days for sheep and goats at the scheduled date of departure.</p> <p>Management plans should consider the following:</p> <p>To ensure an acceptable level of accuracy, pregnancy testing must only be undertaken by a registered veterinarian with demonstrable current experience in pregnancy diagnosis for the given species, with the following exceptions:</p> <p>In the case of sheep, an accredited tester with demonstrable current experience in sheep pregnancy diagnosis may be used, provided all sheep are individually identified and the pregnancy status is linked to the RFID number).</p> <p>In the case of breeder cattle, these should only be tested by a registered vet accredited under the National Cattle Pregnancy Diagnosis Scheme.</p> <p>Requirements for competency of pregnancy testing must be consistent and of the highest standard (this is not a straightforward or precise test).</p> <p>Individual identification of ALL animals is necessary to verify that the animal that had a negative pregnancy test is the animal being exported. Submissions to the 2012 ASEL review indicated that where livestock that are prepared for export are pregnancy tested but are not individually identified it is impossible for the certifying officer to confirm the status of the animals presented. All documentation relating to pregnancy status must identify individual RFID codes.</p>

2.4	Non-farmed livestock
	RSPCA does not support the export of wild-caught animals due to the immense stress such animals experience when handled and transported as reflected in a history of high mortality rates. Wild-caught goats, camels, and buffalo cannot “become conditioned” to being handled with a matter of days or weeks and are particularly vulnerable under high stress handling and transport conditions. They also pose great risk to personnel trying to load, tend, treat or discharge them.
2.5	Vulnerable or special classes of livestock
	Especially vulnerable animals such as livestock with young at foot should not be exported. Handling and long-distance transport at such a young age causes considerable stress to both the young and the mother. The ASEL should prohibit the export of livestock with young at foot.
2.7	On-farm preparation of livestock
	<p>We support recommendation 14 for a minimum of 24 hours rest period for livestock returned to the approved premises or property of origin. Accumulative stress from different stages of handling and transport can have significant consequences for animal health and welfare. Animals must have time for sufficient rest between transport stages.</p> <p>We are however disappointed to see that no further changes are proposed relating to maximum travel times to the airport. The literature review identified multiple studies indicating that total transport time is the most significant factor in transport stress yet the Committee believes the focus should instead be on time livestock spend off water during the entire journey. We strongly recommend that maximum travel times to the airport be introduced and factored into the anticipated total export journey time for the purposes of determining appropriate feed, water, and rest periods.</p>
3	PENNING ARRANGEMENTS AND CRATE DESIGN
	We support draft recommendations 15-18.
4	FODDER AND WATER REQUIREMENTS
	We support draft recommendations 19-21.
5	INSPECTION OF LIVESTOCK
	<p>We support recommendations 22-24.</p> <p>We welcome the industry’s recommendation for an attendant to accompany any air shipment of livestock on a freighter aircraft regardless of the number of animals in the shipment. This should be reflected as a requirement in the ASEL.</p> <p>Conditions for livestock must be monitored continuously throughout the flight. In particular, the consideration of monitoring ammonia levels in transport crates during the journey and setting a maximum level for ammonia. We note that the majority of industry research in this area has been conducted by Enviroag and encourage the committee to meet with the relevant researchers to discuss this aspect of air transport.</p> <p>Inspection of livestock must occur immediately prior to take off and immediately upon landing. Arrangements must be in place with relevant airports and cargo crew to ensure livestock will be attended to immediately and not left on tarmacs or other locations where they will be exposed to adverse temperature or weather conditions.</p>
6	REPORTING REQUIREMENTS

6.2	Contingency planning and reporting requirements
	<p>We support recommendations 27-30 expanding the range of factors for which contingency plans are required, increasing the factors to be recorded in the end of journey report, and the addition of exceeding maximum water deprivation times as a notifiable incident.</p> <p>We would like to see the monitoring of ammonia levels added to the end of journey reporting, and for the disablement of ventilation systems to be added to the list of notifiable incidents.</p>
7	GENERAL
	<p>We support the principle behind recommendation 31 however we do not think the current drafting of the recommendation sufficiently captures the intent expressed in the Committee's views where it refers to the ASEL providing 'over and above the IATA Regulation requirements'. The 'over and above' element is not reflected in the current recommendation. We recommend it be redrafted along the following lines - '...unless the ASEL requirements go over and above the IATA Regulations, in which case the ASEL should apply.'</p>