

16 May 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 Issues Paper

Thank you for the opportunity to comment on the ASEL Review - Air Transport Issues Paper.

While it is acknowledged that air transport is generally safer for livestock than sea transport, disasters can and do continue to occur. There can be no room for complacency. The shift in regulatory approach that is taking place for sea transport in moving from a framework based on mortality to one based on animal welfare must apply equally to air transport.

We provide the attached comments to the Issues Paper questions but we look forward to reviewing the forthcoming literature review so that we may make more detailed comments and recommendations on the Draft Report.

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

Yours sincerely,



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RSPCA Australia submission

Stage 3: Issues Paper - Review of the Australian Standards for the Export of Livestock - Air Transport

2.2	What is the role for government?
Para 4	<p>The Issues Paper makes reference to the recent Productivity Commission report on the regulation of agriculture. It correctly identifies the role for government in responding to the inability of the market to provide acceptable states of animal welfare due to the conflict between welfare and profit-orientated goals within the live export trade. The Issues Paper also quotes the following passage from the Commission's report:</p> <p style="padding-left: 40px;">“An important policy question is whether regulatory arrangements can effectively manage the welfare of Australian live exports without imposing costs that lead to a substitution to exports from other countries.”</p> <p>However, the Issues Paper leaves out the following paragraph in the Commission's report, which provides important context to the passage preceding it:</p> <p style="padding-left: 40px;">“That said, if regulation is unable to effectively address the welfare risks for live exports (both during the voyage and in export supply chains), then the Australian Government could still decide to prohibit the trade on ethical grounds if this aligns with the expectations of the Australian community.”</p> <p>We acknowledge that prohibiting the trade is not the current Government's policy nor is it within the ASEL review's Terms of Reference, but the objective of the current review is to improve the ASEL to deliver acceptable animal welfare outcomes that meet the Australian community's expectations and are based on scientific evidence. Considering whether such improvements may or may not lead to substitution to exports from other countries would place an artificial and inappropriate constraint on the deliberations and decisions of this review. The ASEL are Australian standards governing conduct within and connected to Australia. As a matter of policy, they should not be determined with reference to what other nations may or may not do. To do so would risk undermining our standards leading to a race to the bottom. The review of the ASEL must be considered based on achieving welfare outcomes acceptable to the Australian community and based on scientific evidence.</p>
3	SOURCING AND PREPARATION
3.1	Liveweight and body condition score for livestock exported by air
	<p>1. Should the minimum live weight of sheep exported by air be increased from 20kg to 24kg? Should it be higher/lower and why? What are the animal health and welfare risks?</p> <p>Yes. The minimum live weight of sheep should be increased to at least 24 kg to reduce health and welfare risk associated with the increased stressors of air transport. Younger animals of lower body score are generally more vulnerable in high stress environments.</p>
	<p>2. Should the minimum live weight of goats exported by air be increased from 14kg to 18kg? Should it be higher/lower and why? What are the animal health and welfare risks?</p> <p>Yes. The minimum live weight of goats should be increased to at least 18 kg to reduce health and welfare risk associated with the increased stressors of air transport. Younger animals of lower body score are generally more vulnerable in high stress environments.</p>
	<p>3. Are the weight restrictions for other species appropriate? Should a minimum weight be specified for other species? If yes, what should the minimum weight be (by species)?</p> <p>We would like to review the literature review to be released with the Draft Report before providing more specific comment/recommendations on this question.</p>

	<p>4. Should the standard include a provision for miniature breeds?</p> <p>Yes. This could require the development of a consignment specific management plan.</p>
	<p>5. Should the body condition score tables in Appendix A, as recommended in the ASEL: sea transport final report, be adopted for air transport?</p> <p>Yes.</p>
3.2	Sourcing of deer and camelids
	<p>1. Should the requirements relevant to exporting deer and camelids by air be replaced by the provision of consignment-specific management plans? These plans would initially cover the requirements contained within ASEL but would be required to be customised to address specialised animal health and welfare requirements for these high-risk consignments.</p> <p>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) and should not be transported unless they are habituated to humans and captivity (i.e. reared on farm).</p> <p>We do not agree with the proposal to increase the reportable mortality rate for deer to 3%. The fact that deer are easily stressed is an argument to improve the standard of transport, not to permit more animals to die as a result of transport. See also 3.4.</p>
	<p>2. Are the standards in relation to rejection criteria for deer adequate? Should the requirements for antlers be revised?</p> <p>The standards in relation to the rejection criteria for deer should remain in the ASEL.</p>
3.3	Pregnancy testing requirements
	<p>1. Are the maximum days of gestation appropriate for cattle and buffalo? Should they be changed?</p> <p>We recommend a requirement that animals be certified in writing as no more than a maximum of 180 days pregnant for cattle and 200 days pregnant for buffalo at the scheduled date of departure.</p>
	<p>2. Should the maximum days of gestation be reduced for any other species? If so, which species and why?</p> <p>The maximum days of gestation for sheep and goats should be reduced to 99 days.</p>
	<p>3. Should the pregnancy testing requirements in section 3.3.4 and Appendix B of this paper be adopted for air transport?</p> <p>Yes. Submissions to the 2012 ASEL review indicated that ASEL pregnancy testing requirements are inadequate. It is crucial for the welfare of exported females that all pregnancy testing is as accurate as possible. 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>
3.4	Non-farmed livestock
	<p>1. Are the standards for non-farmed livestock adequate i.e. wild caught camels or goats?</p> <p>RSPCA does not support the export of wild-caught goats or camels due to the immense stress such animals experience when handled and transported as reflected in a history of high mortality rates. Wild-caught goats and camels 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.</p>
	<p>2. Should the standard be revised with respect to the minimum requirement for non-farmed livestock to become accustomed to handling and eating and drinking from troughs prior to export? Is 14 days adequate for camels? What other time frames could be considered and why?</p> <p>Wild-caught goats and camels cannot “become conditioned” to being handled within a matter of days or weeks and are particularly vulnerable under high stress handling and transport conditions. We believe the export of wild-caught livestock should be prohibited.</p>
3.5	Vulnerable or special classes of livestock
	<p>1. Should the standards be amended to remove existing references to livestock with young at foot and be replaced by a provision for a consignment specific management plan? These plans would cover the requirements contained within ASEL but would be required to be customised to address specialised animal health and welfare requirements for these high-risk consignments.</p> <p>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.</p>
3.6	Livestock with horns
	<p>1. Are the standards for horned goats adequate? Should the requirements regarding the length of horns be revised? If so, how?</p> <p>We agree the standards for horned goats are confusing and should be revised for clarity and to strengthen welfare outcomes.</p>
	<p>2. Should the requirements for horned cattle, buffalo and sheep in section 3.6.3 of this paper be adopted for air transport?</p> <p>Yes.</p>
3.7	On-farm preparation of livestock
	<p>1. Should the standards define a maximum travel time from the property where livestock are prepared to the airport? If so, what should it be? Should this be related to the</p>

	<p>anticipated total journey time from the property the livestock are prepared to overseas destination?</p> <p>Yes. This should be consistent with the equivalent maximum time from registered premises to the port for sea transport, and it should be factored into the anticipated total export journey time for the purposes of determining appropriate feed, water, and rest periods.</p>
	<p>2. Should the standards define a minimum rest period if livestock are returned to the property prior to being reloaded onto trucks for export?</p> <p>Yes, this is strongly recommended. Accumulative stress from different stages of handling and transport can have significant consequences for animal health and welfare. Animals should have time for sufficient rest between transport stages.</p>
	<p>3. There is currently a difference in the requirements for premises used for preparation of livestock for export by sea and air. Should the standards be amended to require preparation for export by air to be completed at a registered premises (or an alternative)? If not, why not?</p> <p>This does seem to be a curious omission considering import country requirements still need to be met and many of the risks to health and welfare apply equally to air transport. We would support amendments to ensure consistency in these requirements provided there were no potential adverse implications for animal health and welfare.</p>
4	PENNING ARRANGEMENTS AND CRATE DESIGN
	<p>1. Are the current stocking density and penning arrangements in the standard appropriate for air transport? If not, what should they be? Can this be done within the practical limitations for crates to fit on aircraft?</p> <p>We believe the current density and penning arrangements can be strengthened in line with our comments below.</p>
	<p>2. Do you think more space is required for livestock loaded in the lower cargo compartment/hold of the aircraft? If so, why?</p> <p>Space requirements must be determined on the basis of the animal's health and welfare needs. If the lower cargo compartment/hold of an aircraft poses additional risks to health and welfare, which can be limited by the provision of additional space, then additional space should be required. We would like to review the literature review to be released with the Draft Report before providing more specific comment/recommendations on this question.</p>
	<p>3. Are the current provisions for 'rounding up' stocking densities appropriate (for example, 4.5 animals is rounded up to 5)?</p> <p>We do not think this is appropriate. If any rounding for stocking density calculations is necessary, it should be done with a view to erring on the side of caution with respect to animal health and welfare risks and providing more space - 4.5 animals should therefore be rounded down to 4.</p>
	<p>4. Should the standard include specific stocking density and penning arrangement for alpacas? If so, what should be the basis for the stocking density calculation?</p> <p>Yes. Alpacas have considerably different physical dimensions and features to those of sheep. The stocking densities and penning arrangements should reflect this. Again, we would like to review the relevant literature presented in the literature review prior to providing more detailed commentary on this point. As a general point, the stocking density calculations must be based on the animal's health and welfare needs.</p>

	<p>5. Should the standard include specific stocking density and penning arrangement for camels? If so, what should be the basis for the stocking density calculation?</p> <p>Yes they should. However, we would like to review the relevant literature presented in the literature review prior to providing more detailed commentary on this point. As a general point, the stocking density calculations must be based on the animal's health and welfare needs.</p>
	<p>6. Should the standard include reference to head height (in relation to crate design)? If so, should the standard adopt international standards (IATA Live Animal Regulations) or use another measure?</p> <p>Yes the standard should include reference to head height. We do not agree with the suggestion that the requirement for animals to be able to stand in their natural position without any part of their body touching the overhead part of the crate is "subjective". This is basic physics and anatomy. The fact that this requirement may necessitate consideration of an individual animal's physical height does not make it subjective. If any clarification is needed, perhaps the standard can be amended to refer to the "animal's natural standing position" and a height limit imposed on individuals in a given consignment.</p>
	<p>7. Should the standard include provisions for mixed sex loading (entire males or females) of crates/decks?</p> <p>Yes. The evidence shows that penning entire males with females can lead to increased welfare risk. Mixed sex penning should therefore be prohibited.</p>
5	FODDER AND WATER REQUIREMENTS
	<p>1. Should a consignment specific management plan be submitted to manage the provision of water during transit stops?</p> <p>Yes. Water requirements for animals during air transport may vary considerably depending upon a range of factors specific to the particular journey.</p>
	<p>2. Should a consignment specific management plan be submitted to manage the water deprivation time for the entire journey (from the property the livestock are prepared to the importing country)?</p> <p>Yes. Water requirements for animals during air transport may vary considerably depending upon a range of factors specific to the particular journey.</p>
	<p>3. Should there be a maximum water deprivation time for the entire journey (from the property the livestock are prepared to the importing country)? If so, how long (by species)?</p> <p>The maximum time off water should be reduced to 12 hours to account for cumulative stress.</p>
6	INSPECTION OF LIVESTOCK
	<p>1. Are the current requirements for inspection of livestock practical and feasible? If not, why not and what are alternate suggestions?</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>
	<p>2. Are the facilities available at airports adequate to allow proper inspection of livestock?</p> <p>We are unable to comment on this. If facilities are not adequate to allow proper inspection of livestock, the export should not be approved via the relevant airport until arrangements have been made between the Government, exporter, and airport to facilitate proper inspections.</p>
	<p>3. Should the standard be amended to require inspections at other points in the supply chain? If so, at which points and why?</p> <p>If the amended standards require pre-export preparation to be complete at a registered premises, the standards should require livestock to be inspected at the premises prior to transport to the airport.</p>
	<p>4. Should the standards require a competent person to accompany all or some consignments? If so, which consignments?</p> <p>Yes. A competent person should be required to accompany all air transport consignments to address health and welfare issues at the earliest opportunity.</p>
7	REPORTING REQUIREMENTS
7.1	Reportable mortality rate
	<p>1. Should the reportable mortality rates in section 7.1.2 of this paper be adopted for air transport? If not, what reportable levels are appropriate (for each species)?</p> <p>In light of the considerably shorter journey times, the reportable mortality rates for air transport should be reduced to at least half of those set for sea transport.</p>
7.1	Contingency planning and reporting requirements
	<p>1. What further changes, if any, do you think are necessary to the end of journey reporting requirements in the standards?</p> <p>Additional animal health and welfare indicators should be included in the end of journey report. The additional indicators recommended for sea transport should serve as a starting point where they are equally applicable to air transport.</p> <p>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>2. Should there be specific recording and reporting of animal welfare indicators in the end of journey report? If so, what might these indicators be?</p> <p>Animal welfare indicators reported in the end of journey report for air transport should be consistent with those required for sea transport where they are equally applicable.</p> <p>3. Should the requirements for contingency planning be expanded to cover more issues? If so, what types of contingency plans might be required for air transport?</p> <p>Contingency planning should also be required for significant delays to any stage of the air export journey due to air traffic or airport congestion.</p>

	<p>4. Is the current definition of ‘notifiable incident’ adequate?</p> <p>We believe disablement of ventilation systems on an aircraft carrying livestock should be a notifiable incident regardless of whether it causes serious adverse effect on animal health and welfare or not.</p>
8	GENERAL QUESTIONS
	<p>1. Where there are provisions of international standards and requirements, such as the IATA Live Animal Regulations, relevant to and adopted by the ASEL, should they be reproduced in ASEL or referenced? How might this best be done?</p> <p>There is a need to consider how the ASEL can best remain consistent with the more frequently updated IATA Regulations. However, it is still desirable for Australia to set and maintain its own standards, preferably consistent with IATA. Perhaps the best way to achieve this will be to maintain the core health and welfare, and reporting requirements (addressed in the current ASEL and to be addressed in the revised ASEL) in the ASEL, while also referencing the applicability of the IATA Live Animal Regulations as amended from time to time. However, in the event of any inconsistency, Australian Government regulations that will prevail. Achieving consistency with IATA Regulations and their amendments will inevitably require more regular review of ASEL.</p>
	<p>2. Is the level of regulatory detail for the export of livestock by air in ASEL necessary and appropriate? Should the standards for air be largely outcomes focused and avoid prescription (given the role of the IATA Live Animal Regulations)?</p> <p>Yes, the level of detail is necessary and appropriate. Best practice standards development generally requires a balance of prescriptive and outcomes based provisions. We do not agree with the suggestion that the commercial incentives in live export via air transport are sufficient to address conflicts between welfare and profitability goals. The individual value of the animals may generally be higher but it is important to acknowledge that this does not guarantee good welfare outcomes. The commercial value of animals may be impacted by poor animal health, particularly if it leads to mortality, but it is not impacted by poor welfare per se. This is especially so if the poor welfare state does not lead to consequences for the animal’s health and productivity. Thus, Government regulation is still necessary to ensure welfare outcomes and to reduce risk.</p>