



6 October 2021

Tina Hutchison
First Assistant Secretary
Plant and Live Animal Exports Division
Department of Agriculture, Water and the Environment

Via: haveyoursay.awe.gov.au


Dear Tina

ASEL 3.1 update

Thank you for the opportunity to comment on the proposed update of ASEL 3.1.

We support the proposed change to the definition of animal welfare.

We do not support the following proposed changes:

5.1.20 The deferral of the maximum ammonia level restrictions 'until further notice'. It has now been two years since the ASEL review concluded. Setting maximum ammonia levels is standard practice in intensive farming situations. The animal and human welfare impacts of high levels of ammonia are well documented. Ammonia is easily measured -  has provided advice on how to measure ammonia levels in previous consultation processes. This is already double the time recommended by the ASEL Technical Committee for complying with this standard. It should not be delayed further.

5.6.5(j) Removing exceeding the average daily mortality rate as a notifiable incident.

6.1.24 Removing the requirement for stock handlers to accompany livestock during air transport.

We also note the requests by 'stakeholders' to reduce the two clear day holding time for cattle at registered establishments and removing the additional clear day requirement for sheep following shearing. While we note the Department is not intending to make these changes in the current update, we wish to make it absolutely clear that we do not support such proposals.

We trust our comments have been of assistance. We look forward to being consulted on the many issues identified for future review processes.

Yours sincerely,

