



Department of Agriculture: Regulator's response to the final report on the review of the Australian Standards for the Export of Livestock: Air Transport

- The technical advisory committee was appointed by the Department of Agriculture to review the Australian Standards for the Export of Livestock (ASEL) and ensure they remain fit for purpose.
- The final report on the Review of the ASEL: air transport was provided to the department on 15 August 2019.
- The government's policy is to continue the live export trade while strongly supporting the development of effective measures to manage animal welfare outcomes in this trade.
- There are a number of Australian and international regulations and standards that apply to the export of livestock by air transport including the ASEL, the International Air Transport Association Live Animals Regulations (IATA Regulations), the World Organisation for Animal Health Terrestrial Animal Health Code (OIE Code), and the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (Land Transport Standards).
- Under the framework established under the *Export Control Act 1982* and *Australian Meat and Live-stock Industry Act 1997*, the department, as the regulator, has responsibility for setting operating rules for exports and therefore for responding to the recommendations in the final report on the review of the ASEL: air transport. In doing so, the department has taken animal welfare, the interests of the industry and the government's policy into account.
- On this basis, the department supports or supports in principle the recommendations from the ASEL review committee and will implement them as soon as practical. The department notes that some of the recommendations require consultation with other entities or do not require changes to the ASEL.
- The recommendations will have minimal impact on the regulation of livestock exports. However, there are a few new measures being imposed, which include:
 - reduced notifiable mortality level for all livestock species;
 - changing the rounding point from n.5 to n.7
 - more detailed welfare monitoring and reporting;
 - attendants to accompany consignments;
 - management plans for classes of livestock that require specialised care.
- The recommendations that impact the ASEL will be incorporated into a revised, reformatted standard and implemented in 2020. The department will work with industry participants to ensure implementation is done with the least administrative burden as possible.
- The department's response to each of the committee's recommendations is attached.

RECOMMENDATION	RESPONSE
<p>Recommendation 1 – Sourcing and Preparation That the minimum weight of alpacas sourced for export by air be raised to 20kg.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 2 – Sourcing and Preparation That the standards require a management plan for the sourcing and export of deer under 6 months of age. The management plan must address potential risks during transport including the management of livestock during delays, access to water, rest periods and any additional space requirements.</p>	<p>Support. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 3 – Sourcing and Preparation That the standards require a management plan for the sourcing and export of miniature breeds and other livestock that do not meet the minimum liveweight requirements. The management plan must address potential risks during transport including the management of livestock during delays, access to water, rest periods and any additional space requirements.</p>	<p>Support. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 4 – Sourcing and Preparation That the body condition score tables for beef and dairy cattle, buffalo, sheep, goats, camels and alpacas included in Appendix A of the report be adopted for air transport.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 5 – Sourcing and Preparation That the standards (S6.15) be amended to prevent male deer being sourced for export by air unless they have hard antlers removed leaving only buttons, they are not in the first two weeks after velveting and they are outside the roar and rut periods if they are over one year of age.</p>	<p>Support. This will be implemented in 2020.</p>

RECOMMENDATION	RESPONSE
<p>Recommendation 6 – Sourcing and Preparation</p> <p>That the rejection criteria in the standards be amended to prevent deer being exported that have broken velvet.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 7 – Sourcing and Preparation</p> <p>That the pregnancy testing requirements detailed in Appendix B of the report be adopted for livestock exported by air.</p>	<p>Support in principle. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 8 – Sourcing and Preparation</p> <p>That the standards require a management plan for livestock exported in the last third of pregnancy. The management plan must address potential risks during transport including the management of livestock during delays, access to water, rest periods and any additional space requirements.</p>	<p>Support. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 9 – Sourcing and Preparation</p> <p>That standard 6.13 (goats) and 6.14 (deer) be amended to: require that non-farmed goats and deer must not be sourced for export unless they have become conditioned to being handled and to eating and drinking from troughs for a minimum of 21 days at some time before being sourced for export.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 10 – Sourcing and Preparation</p> <p>That the standard include a requirement for non-farmed buffalo to have become conditioned to being handled and to eating and drinking from troughs for a minimum of 21 days.</p>	<p>Support. This will be implemented in 2020.</p>

RECOMMENDATION	RESPONSE
<p>Recommendation 11 – Sourcing and Preparation</p> <p>That the standards require a management plan for livestock that are exported with young at foot. This plan must address possible risks during transport including the management of livestock during delays, access to water, rest periods and any additional space requirements.</p>	<p>Support. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 12 – Sourcing and Preparation</p> <p>That the standards prevent livestock that have given birth in the five days prior to the expected date of departure of the aircraft, from being exported.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 13 – Sourcing and Preparation</p> <p>That the requirements for horned cattle, buffalo and sheep outlined in Section 2.6.3 of the report be adopted for air transport. That is;</p> <ul style="list-style-type: none"> a) for cattle, tipping should only remove a solid, nonvascular portion of the horn, and result in a blunt horn end; b) for buffalo, if the horns are no longer than the spread of the ears; and <p>for sheep, are no longer than one full curl.</p>	<p>Support in principle. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 14 – Sourcing and Preparation</p> <p>That the standards (ASEL v2.3, S6.12) for sourcing horned goats for export by air be amended in line with the Land Transport Standards: Horn trimming or removing sharp horn points is recommended to minimise injury to other goats. Where tipping is applied for bucks, horns should be tipped within 2.5-5cm from the tip (no further down than 2cm diameter of horn) and for does less than 2cm from tip to avoid sensitive zones. Tipping, where applied, should be done at least seven days before transport.</p>	<p>Support. Implementation of this recommendation will be subject to further consultation.</p>

RECOMMENDATION	RESPONSE
<p>Recommendation 15 – Sourcing and Preparation</p> <p>That the standards require a minimum 24 hour rest period for any livestock that have been returned to an approved premises or alternative property after being transported to the airport, and prior to being reloaded for transport back to the airport.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 16 – Stocking Density</p> <p>That the space allowances in Appendix C of the report be adopted for alpacas (this table is based on the Land Transport Standards space allowances).</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 17 – Stocking Density</p> <p>That the standards require camels over 300kg liveweight to be penned for air transport in accordance with a management plan.</p>	<p>Support. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 18 – Stocking Density</p> <p>That the standards require livestock to be penned for air transport with animals of the same species, class, gender and of a similar weight (note: castrated males may be penned with females however entire males must be penned separately). Animals must be crated with similar weighted and sized animals or the crate must be divided so that animals of unequal size are penned separately.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 19 – Stocking Density</p> <p>That the current wording in 6.1.1 (2)(b) be changed to – “that when calculating the stocking density per pen, the number of livestock per pen may be rounded to the nearest whole number. n.7 (and below) must be rounded down.”</p>	<p>Support. This will be implemented in 2020.</p>

RECOMMENDATION	RESPONSE
<p>Recommendation 20 – Livestock Management</p> <p>That a management plan for water deprivation time during the whole journey be required for all livestock consignments by air. This plan should address the time livestock are off water and include water management arrangements during delays and transit stops, aimed at ensuring maximum water deprivation times are not exceeded.</p>	<p>Support. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 21 – Livestock Management</p> <p>That the maximum water deprivation times reflect the Land Transport Standards be adopted as detailed in Appendix D of the report.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 22 – Livestock Management</p> <p>The exporter must ensure a competent attendant is present during planned transit stops and unloading of livestock from the aircraft to oversee the welfare of the animals.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 23 – Livestock Management</p> <p>That the standards require a competent attendant appointed by the exporter(s) accompany consignments where the livestock are transported:</p> <ul style="list-style-type: none"> a) on all charter aircraft dedicated to livestock; and b) on a freighter aircraft unless otherwise agreed by the relevant government authority. <p>The role of the attendant is to oversee the welfare of the livestock during flight, at transit stops and during unloading of livestock from the aircraft.</p>	<p>Support in principle. Implementation of this recommendation will be subject to further consultation.</p>

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<p>Recommendation 24 – Livestock Management</p> <p>That standard 6.22 is amended to:</p> <p>Livestock for export by air must be checked to ensure they remain fit to travel:</p> <ul style="list-style-type: none"> a) immediately before departure; b) where feasible: <ul style="list-style-type: none"> i. within 30-60 minutes of commencement of the flight ii. at least every 2-3 hours during the flight; iii. as soon as possible after landing c) immediately prior to departure during any transit stops. 	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 25 – Facilities</p> <p>The department should work with the relevant organisation(s) to review and improve the facilities available at airports for the unloading of livestock from land transport, inspection and loading into crates and loading onto the aircraft, to ensure they meet the standards expected to mitigate risks associated with animal health and welfare.</p>	<p>Support in principle. No change is required to ASEL. The department will consider the implementation of this recommendation.</p>
<p>Recommendation 26 – Reporting</p> <p>That the reportable level for mortalities for sheep, goats, camelids and deer should be set at 1 per cent, or three animals, whichever is greater.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 27 – Reporting</p> <p>That the reportable level for mortalities for cattle and buffalo should be set at 0.5 per cent, or three animals, whichever is greater.</p>	<p>Support. This will be implemented in 2020.</p>

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<p>Recommendation 28 – Reporting</p> <p>That the question of mortality reporting be examined by the department in consultation with industry, in an attempt to cover the whole period that the animals are held in air export crates.</p>	<p>Support in principle. No change to ASEL is required at this time. Implementation of this recommendation will be subject to further consultation.</p>
<p>Recommendation 29 – Reporting</p> <p>That the standards require that each shipment has a contingency plan for the management of livestock in the event the aircraft is diverted and forced to land at a location different from the intended transit stop(s) or destination. An exporter’s contingency plan must demonstrate how a suitable person will attend unplanned stops to oversee the welfare of the animals.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 30 – Reporting</p> <p>That the standards require a contingency plan for euthanasia for any animal where it is deemed as required either on-board the aircraft if livestock are accessible and it is safe to do so, or as soon as possible after unloading the livestock from the aircraft.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 31 – Reporting</p> <p>That the requirements for the end of journey report be updated as per Appendix E of the report to include more detailed animal welfare and environmental monitoring and to cover more aspects of the air export journey.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 32 – Reporting</p> <p>That the standards include a notifiable incident if the maximum water deprivation time is exceeded. If maximum water deprivation times are exceeded, exporters should notify the</p>	<p>Support. This will be implemented in 2020.</p>

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<p>department as soon as possible. The report should include details of any mitigating measures that have been employed to address the issue.</p>	
<p>Recommendation 33 – General</p> <p>That the standards include a provision that the IATA Regulations, as amended and in force from time to time, shall apply to the export of livestock by air from Australia, unless there is a variance with the ASEL, in which case the ASEL should apply.</p>	<p>Support. This will be implemented in 2020.</p>
<p>Recommendation 34 – General</p> <p>That the department releases an Export Advisory Notice when the IATA Regulations are amended.</p>	<p>Support in principle. No change is required to ASEL. The department will consider the best way to ensure exporters are aware of IATA regulations (as amended).</p>