



Department of  
**Primary Industries and  
Regional Development**

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

Date: 17 July 2019

Dear Mr McCutcheon,

**Draft report: 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 review the draft report of the Australian Standards for the Export of Livestock (ASEL): Air Transport. The Department recommends that any changes to the ASEL are based on scientific evidence. Where this evidence does not exist or is lacking in robustness, the Department supports further research into these areas as needed. Comments below relate to specific sections in the report and are numbered accordingly.

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

The Department does not support leaving the minimum live weight of sheep exported by air at 20kgs. The Department recommends that a 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 generally need longer than two to recover from weaning and be robust enough for export.

Whilst the Department supports the draft recommendation that a specific management plan for those breeds of livestock who do not conform to the minimum live weight requirements, the Department recommends that this only applies to miniature breeds, not to animals of standard sized breeds who fail to meet the minimum weight. Animals of standard sizing who fail to meet the minimum weights for their species are likely to have nutritional stress or a health issue that needs to be managed pre-export and are therefore not suitable for export.

2.3 Pregnancy testing requirements

Whilst the Department acknowledges the draft requirements for a management plan for livestock exported during their third trimester of pregnancy, we recommend avoiding export during the last trimester all together. Whilst the Department acknowledges that parturition may

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not be imminent, there is a higher risk of negative health and welfare issues arising (such as hypercalcemia) during transport in the last trimester.

#### 2.4 Non-farmed livestock

The Department supports the recommendation that non-farmed livestock must be conditioned to handling, and eating and drinking from troughs, prior to export. We further recommend that the standards include provisions to remove individual animals who are not acclimatising within the required period.

#### 2.5 Vulnerable or special classes of livestock

Whilst the report outlines generally what classes of animals should be classed as “vulnerable” the Department strongly recommends the inclusion of a definition in the standards. The Department supports a provision for a consignment specific management plan for all types of vulnerable animals. 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 supports the committee’s recommendation that the standards prevent livestock that have given birth in the 5 days prior to the expected date of departure, from being sourced for export.

#### 3. Penning arrangements and crate design

The Department supports the committee’s recommendation that livestock must be penned with the same species, class, weight and gender (including castrated males). The Department notes that immature entire males can be penned with females. The Department does not support this unless the committee defines “immature male” and includes this definition in the standards.

#### 5. Inspection of livestock

The Department recommends 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 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 after the aircraft lands.

It is disappointing that the committee did not recommend alternatives to manual inspection such as video monitoring during flight. Technology such as real time monitoring could be a valuable tool in monitoring the animal’s health and welfare without disturbing them. The Department acknowledges the committees reference to the Live Air Transport Safety Assessment (LATSA) software but it is the Departments understanding that it is not mandatory to use. Additionally, this software is only a prediction tool to determine if the aircraft has the basic capability to transport the consignment without incident. At no stage does this software report inflight conditions in real time. Essential environmental conditions such as cabin pressure, ventilation, humidity, temperature and lighting must be monitored during flight and included in reporting requirements, and the Department urges the committee to revisit this issue.

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

A handwritten signature in black ink, appearing to read 'Bruce Mullan', with a long, sweeping horizontal stroke at the end.

Dr Bruce Mullan

Director Livestock Research and Industry Innovation