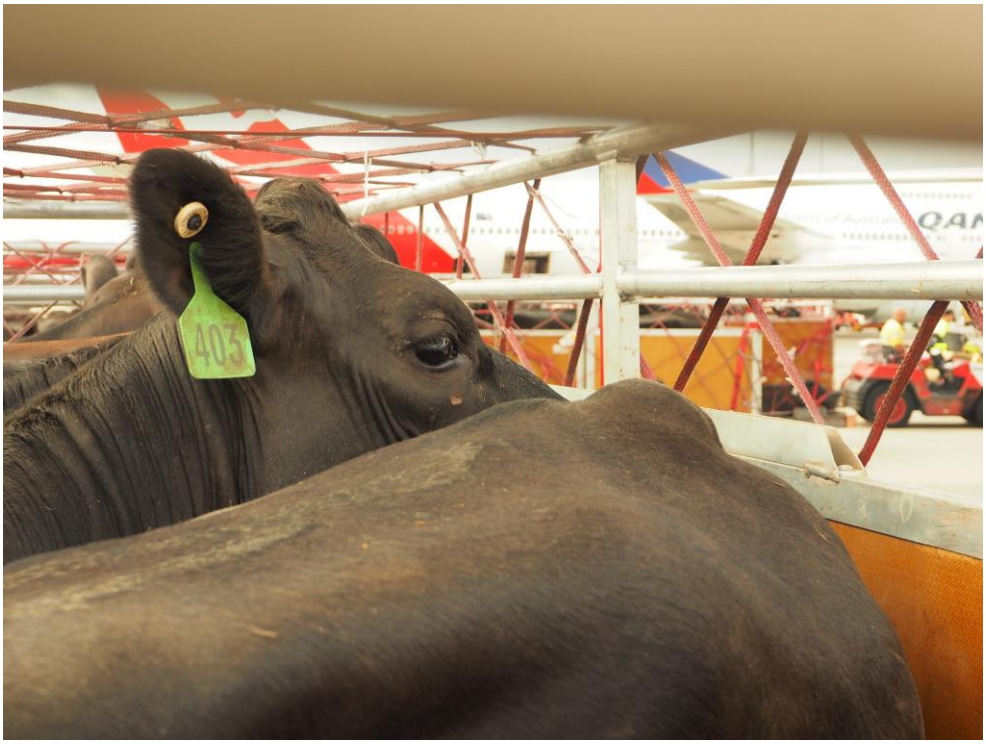
Review of ASEL Air transport 2019 – Submission by a group of Australian Government Accredited Veterinarians for Stage 2 Issues Paper



The following group of Australian Government Accredited Veterinarian (AAVs) and other veterinarians have prepared this submission for the ASEL technical advisory committee as requested through stage 2 of the ASEL review process:

Editors

- Dr Andrew Way
- Dr Holly Ludeman

AAVs who contributed directly/indirectly or responded to communications

- Dr Peter Lynch
- Dr Greg McCann
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The ASEL Review documents (Issue paper and Draft report) to help with this submission can be found at:
http://agriculture.gov.au/animal/welfare/export-trade/review-asel/air-voyages

Scope

The following document provides opinions and thoughts from AAVs and veterinarians listed. Each section is not a full representation of each submitting contributor. Where vastly differing opinions were received they are listed. The number of opinions is not representative of the number AAVs making comments as similar comments have been grouped together.

The document is not exhaustive of all AAVs and this group recommends the ASEL committee interviews and engages directly with AAVs as a key stakeholder group.

AAVs are best placed to review operational effectiveness or practical application of research and proposed monitoring tools. AAVs have a unique skills bases, have a thorough understanding of the structure of international trade and how this relates to Australia's animal health system which is supported by additional training through the APAV and AAV programs. AAVs are a group whose profession dictates that animal welfare is paramount and are regulated by both State/Territory and Federal legislation. AAVs are well placed to report if proposed or implemented changes are effective in improving animal health or welfare.

Method

This submission was developed through input from AAVs and other veterinarians associated with the live export industry.

An email was sent to all currently registered AAVs asking for their input into the working draft document. A follow up email was sent, to all registered AAVs, with a link to the more finalised document asking for further input and if the AAVs could advise the editors if they wish their name added or removed from the document.

Google docs was used to create the submission as multiple people can edit, comment, or view the document at once. Contributions, either through written or verbal communications, have been included in the submission. If there was vastly different opinions these were listed under the relevant questions. A scientific approach, and where appropriate supported by individual experiences, has been taken.

AAVs are constrained by work commitments and as a group has not had the resources to review all scientific literature (both peer review and grey) to identify appropriate references.
Relevant scientific references to research may be found in the Livecorp and ALEC submissions.

Definitions

- **AAV:** refers to Australian government Accredited Veterinarians
- **Class:** the purpose the animal is being exported (Breeder, Feeder, Slaughter)
- **DAWR:** Department of Agriculture and Water Resources may also be referred to as “the department”
- **EAN:** Export Advisory Notice
- **EOV:** End of Voyage
- **Industry:** refers to the livestock export industry as a whole.
- **POO:** Property of Origin
- **RP:** Registered Premises
- **Type:** a characteristic that the can define a group of animals (Breed, Sex, etc)

Issues paper questions

2 Sourcing and preparation of livestock

2.1 Liveweight and body condition score for livestock exported by air

Draft recommendations

1) That the standards require a management plan for the sourcing and export of deer under 6 months of age.
2) 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.
3) That the body condition score tables for beef and dairy cattle, buffalo, sheep, goats, camels and alpacas included in Appendix A be adopted for air transport.

Please see draft report as there are many pages some species have diagrams and others do not. It is unclear where multiple assessment methods are presented which method or reporting number is to be used

In summary:

- Beef cattle body condition score scale 1-5 and other scores presented
- Dairy cattle condition score scale 3-6
- Buffalo body condition score scale 1-5 and other scores presented
- Sheep body condition score scale 1-5
- Goat body condition score scale 1-5 and other scores presented
- Alpaca body condition score scale 1-5
- Camel body condition score scale 1-5
- Deer body condition score scale 1-5

AAV comments/recommendations

AAV Opinion 1:

Body condition scores 1 and 2 for all species should not be exported, except for Dairy Cattle where condition score less than 4 should not be exported.

Clarity should be provided by the committee about which body condition score system is being used for the standards and scientific references to the system should be provided.

AAVs would like more information on how conflicts will be resolved between breed, body condition score, body weight, and age when they exist?

AAV Opinion 2:

Dairy cattle condition score is a 1-8 scale - see dairy Australia for definitions. Dairy cattle < score 3.5 arguably are not fit for long haul transport and should not be eligible for export by air. Generally, pre-export quarantine periods and supplementary feeding should be sufficient to eliminate dairy cattle <BCS3.5

AAV Opinion 3:
Supportive of below recommendations from ALEC ASEL stage 1 submission to the TAC 2018
Paragraph 1A.3.4 (e) should be amended to read …. 'For export by air, sheep must have a live weight of more than 24 kg.'
Paragraph 1A.3.5 (f) (i) should be amended to read …. 'a liveweight of more than 18 kg.'

AAV Opinion 4 and 5:
Consistency in body condition scoring systems is needed across ASEL and should align with national systems used as much as possible. AAVs should work with exporters to ensure management plans are suitable for the risks associated with the type and class of livestock being exported. Increases or decreases in weight can not be substantiated with data at this point and the success of air transport voyages demonstrates risks has been effectively managed.

2.2 Sourcing of deer and camelids

Draft recommendations

4) 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.
5) That the rejection criteria in the standards be amended to prevent deer being exported that have broken velvet.

AAV comments/recommendations

There have been no deer exported in the previous 3 years. This class of livestock represents a very low number. Animal welfare risks associated should be considered on a case by case basis by veterinarians experienced with this species.

2.3 Pregnancy testing requirements

Draft recommendations
6) That the pregnancy testing requirements detailed in Appendix B be adopted for livestock exported by air.
7) That the standards require a management plan for livestock exported during the third trimester 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.

Appendix B Pregnancy testing requirements

Pregnancy testing for breeder cattle or buffalo

A valid pregnancy test for breeder cattle or buffalo must:

(a) have been carried out during the 30 day period before export, unless otherwise agreed by the relevant Australian Government agency, with that agreement to be provided only where necessitated by circumstances outside the control of the exporter and where the exporter can demonstrate it will not impact on animal welfare.

(b) be evidenced by written certification by the person carrying out the test that the animal is no more than 250 days pregnant at the scheduled date of departure.

NOTE: For consignments where an accredited PREgCHECK® tester is required, the exporter must ensure the name of the accredited tester, their accreditation number and a statement of their accreditation is provided on the pregnancy declaration for the consignment.

(c) That in relation to (b), the veterinarian may base this certification on assessment of the animals by a method other than manual palpation if the veterinarian:

(i) is accredited under the PREgCHECK® Scheme, and

(ii) determines that cattle or buffalo are too small to be manually palpated safely.

Pregnancy testing for feeder or slaughter cattle or buffalo

A valid pregnancy test for feeder or slaughter cattle or buffalo must:

(a) have been carried out during the 30 day period before export, unless otherwise agreed by the relevant Australian Government agency, with that agreement to be provided only where necessitated by circumstances outside the control of the exporter and where the exporter can demonstrate it will not impact on animal welfare

(b) be carried out by a registered veterinarian

(c) be evidenced by written certification by the person carrying out the test, that the animal is not detectably pregnant.

Pregnancy testing for camelids

A valid pregnancy test for camelids must:

(a) have been carried out during the 30 day period before export, unless otherwise agreed by the relevant Australian Government agency, with that agreement to be provided only where necessitated by circumstances outside the control of the exporter and where the exporter can demonstrate it will not impact on animal welfare

(b) have been carried out by ultrasound, or in the case of breeders by ultrasound foetal measurement
(c) be carried out by a registered veterinarian with demonstrable current experience in camelid pregnancy diagnosis
(d) be evidenced by written certification by the person carrying out the test, that the animal is not detectably pregnant, or in the case of breeders, not more than 250 days pregnant.

Pregnancy testing for goats, sheep or deer

A valid pregnancy test for goats, sheep or deer must:

(a) have been carried out during the 30 day period before export, unless otherwise agreed by the relevant Australian Government agency, with that agreement to be provided only where necessitated by circumstances outside the control of the exporter and where the exporter can demonstrate it will not impact on animal welfare
(b) have been carried out by ultrasound, or in the case of breeders by ultrasound foetal measurement
(c) be carried out by a person able to demonstrate a suitable level of experience and skill, and
(d) be evidenced by written certification by the person carrying out the test, that the animal is not detectably pregnant, or in the case of breeders, not more than the specified number of days pregnant at the scheduled date of departure in Table 22:

Table 22 maximum days gestation for breeder goats, sheep and deer

Livestock	Maximum days gestation
Deer (axis, fallow, sika)	170
Deer (rusa, red, reindeer)	185
Sheep	115
Goats	115

AAV comments/recommendations

AAV Opinion 1:
Concern exists over use of non-veterinarian pregnancy testers. There are no current accreditation scheme for lay-pregnancy testers. Without an accreditation scheme it seems difficult to ensure ASEL standards are consistently met with the accuracy desired.

This concern exists even more when pregnancies are in the upper limits of the gestation allowed. It is very difficult to accurately determine the age of late gestation pregnancies age (cattle pregnancies above 250 days, sheep pregnancies above 115 days).

There could be additional information provided to determine the age of late gestational pregnancies such as Artificial Insemination (AI) or Embryo Transfer (ET) dates, joining dates, early scan dates, etc.

Animal welfare needs to be considered while no overstepping to effectively reduce business risk for the exporter.

AAV Opinion 2:
All registered veterinarians should be able to pregnancy test animals for export regardless of species, class or type. ACV Pregcheck accreditation should be optional. Legislative control for malpractice (inaccurate pregnancy testing and false declarations) lies with the State or Territory Veterinary Boards not the Australian Veterinary Association.

AAV Opinion 3 and 6:
Cattle: Certification of pregnant cattle should only be performed by a PREgCHECK accredited veterinarian. At this time, veterinary registration or nationally recognised training of pregnancy testing, nor approval of non-veterinarians by WA VSB or NT DPI, do not require competence to estimate gestational age to perform PDx in cattle. Pregcheck accreditation does require demonstrable competence of gestational ageing (within technical limitations of the procedure) and therefore should be the minimum requirement for certification of pregnant cattle with limits on gestational age.

Regardless of method (transrectal palpation or ultrasound), it is not technically possible to determine gestational age +/- 250 days pregnant with a degree of certainty to minimise the risk of parturition during or immediately after PEQ or export by air, and therefore, without additional confirmatory information, does not adequately mitigate risk of adverse welfare of pregnant animals. I would propose that maximum gestational age is aligned with ASEL Sea transport standards (not permitted in last trimester) except in circumstances where the exporter can demonstrably address the issue of accuracy of gestational age within their CRMP. This may include verifiable A.I. dates or mating dates, or verifiable PDx at an earlier stage when gestational ageing was determined with acceptable accuracy, in combination with confirmatory PDx within 30 days of export. In addition, if cattle are exported in third trimester,

exporters management plans should consider welfare risks associated with post-arrival transport and quarantine requirements.

Sheep: Similar issues apply to estimating gestational age in sheep and goats by transabdominal ultrasound, and there is no training or accreditation program in Australia that provides assurance of an operator's capacity to provide gestational age of these species, particularly in late in the 3rd trimester of pregnancy.

The statement: (b), the veterinarian may base this certification on assessment of the animals by a method other than manual palpation if the veterinarian:
(i) is accredited under the PREgCHECK® Scheme, and
(ii) determines that cattle or buffalo are too small to be manually palpated safely.

Is ambiguous in regard methodology and does not align with standards of the PREgCHECK scheme (which has separate palpation and ultrasound accreditation). This statement should be reviewed in both the ASEL sea transport and air transport.

Further technical advice should be sought from the Australian Cattle Veterinarians, and the Australian Sheep Camelid and Goat Veterinarians if required.

AAV Opinion 4:
Supportive of below recommendations from ALEC ASEL stage 1 submission to the TAC 2018
- "For cattle exported by air, the maximum stage of pregnancy allowed should be 220 days."

AAV Opinion 5:
This issue is one that can divide the veterinary profession and industry. Veterinarians are the best placed to perform pregnancy testing and should be engaged as the animal health and welfare professionals. The role of the ASEL standards and guidelines is to reduce risks of poor animal welfare outcomes and provide clear auditable guidelines for the industry. Any unwanted pregnancy in tested livestock needs effective feedback to ensure accountability to the tester. Exporters and DAWR have not in the past systematically provided any feedback or collated records on this topic. The standards in ASEL manage animal risks however the risks associated with personnel performing the testing needs to be quantified. DAWR or industry should set up clear recording of all unwanted pregnancies during flights and vessels so future ASEL reviews are more informed.

2.4 Non-farmed livestock

Draft recommendations

8) That the standard requiring goats to be conditioned to being handled and to eating and drinking from troughs for a minimum of 21 days before transfer to a registered or approved premises (S6.13) be amended to apply to non-farmed goats only (that is rangeland or feral goats).
9) That the standard include a requirement for non-farmed buffalo to become conditioned to being handled and to eating and drinking from troughs for a minimum of 21 days.

AAV comments/recommendations

AAV Opinion 1 and 2:

Animals that have not adapted to handling, eating and drinking are to be excluded from export.

2.5 Vulnerable or special classes of livestock

Draft recommendations

10) 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.
11) That the standards prevent livestock that have given birth in the five days prior to the expected date of departure, from being sourced for export.

AAV comments/recommendations

AAV Opinion 1:

Animals of all species should be 14 days old before being eligible for export.

2.6 Livestock with horns

Draft recommendations

12) That the requirements for horned cattle, buffalo and sheep outlined in Section 2.6.3 of this report be adopted for air transport. That is; a) for cattle, no longer than 12 cm in length and 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 c) for sheep, are no longer than one full curl.
13) 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 2.5-5 cm from the tip (no further down than two cm diameter of horn) and for does less than two cm from tip to avoid sensitive zones. Tipping, where applied, should be done at least seven days before transport.

AAV comments/recommendations

AAV Opinion 1:

Where possible standards should align with Australian Animal Welfare Standards and Land Transport of Livestock for consistency and ease of compliance throughout the supply chain. Supportive of “the nonvasucular horn tip removed to a diameter of three cms” and no inclusion of 12 cm in length.

2.7 On-farm preparation of livestock

Draft recommendations

14) That the standards require a minimum 24 hour rest period for any livestock that have been returned to the approved premises or property of origin after being transported to the airport, and prior to being reloaded for transport back to the airport.

AAV comments/recommendations

AAV Opinion 1 and 2:

Contingency plans are in place for water deprivation and exporters will have management plans and rest periods incorporated. These shipments are high value animals and welfare is the highest priority. Transports should be in line with Land Transport standards and the exporter's management plan.

3 Penning arrangements and crate design

Draft recommendations

15) That the space allowances in Appendix C be adopted for alpacas (this table is based on the Land Transport Standards space allowances).
16) That the standards require camels over 300 kg liveweight to be penned for air transport in accordance with a management plan.
17) That the standards require livestock to be penned for air transport with the same species, class, weight and gender (note: castrated males may be penned with females however whole males must be penned separately, unless immature). Particularly small (low weight) animals must be crated with similar weighted animals or the crate must be divided so that animals of unequal size are not mixed together in a given space.
18) 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."

Appendix C Pen space allowances for alpacas

The following pen space allowances have been taken from the Land Transport Standards.

Table 23 pen space allowance for alpacas

Mean liveweight (kg)	Minimum floor area (m2/head)
20	0.4
30	0.5
40	0.6
50	0.7
60	0.8
80	1.0

Alpacas must have enough space to be able to cush during transport, that is sit with their legs folded underneath them.

The estimated area for an alpaca cush is approximately 0.55 m2 for a 40–50 kg alpaca.

AAV comments/recommendations

AAV Opinion 1:

Unlike export by sea, stocking rates should carefully consider the need for animals to support each other if movement of the aircraft becomes severe or turbulence is experienced. Land transport stocking densities are more appropriate than ASEL export by sea stocking densities.

AAV Opinion 2:

There should be lattitude to mix sexes when it is indicated--for example mature Buffaloe bulls travel much better when mixed with pregnant females they have been run with.
There is ample room provided by ASEL for stocking density as evidenced by the outcomes of airfreight and has been formulated to include rounding up-rounding down is unnecessary and restrictive to a form of live export we should be helping to be competitive.

4 Fodder and water requirements

Draft recommendations

19) That a management plan for water deprivation time during the air export journey be required for all livestock consignments by air. This plan should address the plan for 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.
20) That the maximum water deprivation times reflect the Land Transport Standards and be adopted in ASEL for the air export journey, as detailed in Appendix D.
21) The regulator should be required to assess the air export journey times proposed by the exporter to ensure they are realistic and that the maximum water deprivation time is not likely to be exceeded and have the ability to vary the plan if it considers the proposed times are not realistic.

Appendix D Maximum water deprivation times for the air export journey

The following maximum water deprivation and minimum rest times must be observed for the air transport of animals:

Table 24 maximum water deprivation time and minimum rest times

Species	Class	Maximum water deprivation time	Minimum rest period (prior to commencing another journey)
Alpacas	over 12 months	24 hours	24 hours
	6 to 12 months, or up to second trimester of pregnancy	8 hours	12 hours
	in the third trimester of pregnancy; lactating with young at foot; or cria up to 6 months	4 hours	12 hours
Buffalo (note: Buffalo must not be held off water prior to transport, no curfew is permissible)	over 6 months; or up to second trimester of pregnancy	36 hours	24 hours
	1 to 6 months; in third trimester of pregnancy; or lactating with young at foot	24 hours	12 hours

Camels	over 6 months; or up to second trimester pregnancy	48 hours	36 hours
	1 to 6 months; in third trimester of pregnancy; or lactating with young at foot	24 hours	12 hours
Cattle	over 6 months	48 hours	36 hours
	1 to 6 months; lactating with young at foot; or in third trimester of pregnancy	24 hours	12 hours
Deer	over 6 months	48 hours	36 hours
	1 to 6 months	28 hours	12 hours
	in third trimester of pregnancy	24 hours	12 hours
Goats	over 6 months	48 hours	36 hours
	1 to 6 months	28 hours	12 hours
	third trimester pregnancy	24 hours	12 hours
Sheep	over 4 months	48 hours	36 hours
	1 to 4 months	28 hours	12 hours
	in third trimester of pregnancy	24 hours	12 hours

AAV comments/recommendations

AAV Opinion 1:

Our experience with water deprivation is that we tend to be too conservative- stock travel well when dry and the conditions within the trucks and planes are much better for reduced faeces and ammonia--we need to be sure that we are basing these decisions on outcomes and science not simply conservatism.

5 Inspection of livestock

Draft recommendations

22) The exporter must ensure a competent attendant can be present during transit stops (planned and unplanned) and unloading of livestock to oversee the welfare of the animals.
23) That the standards require a competent attendant appointed by the exporter accompany consignments where the livestock are transported in a charter/freighter aircraft dedicated or substantially dedicated to livestock. The role of the attendant is to oversee the welfare of the livestock during flight, at transit stops and unloading.
24) 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 work health and safety, and animal health and welfare.

AAV comments/recommendations

AAV Opinion 1:

Does “oversee” mean that the attendant has authority to stop or change the unloading if welfare or safety is compromised?

AAV Opinion 2:

Supportive of recommendations from ALEC ASEL stage 1 submission to the TAC 2018 as follows

Paragraph 3B.2 (b) should be amended as follows:

‘For export by air, livestock must be checked to ensure health and welfare is maintained:

(i) for livestock travelling in a lower cargo hold - as late as possible before the animals are loaded into the aircraft and as soon as possible after they are unloaded;

(ii) for livestock travelling on the main deck of a freighter aircraft – when the animals are loaded onto the aircraft, until the main door of the aircraft is closed, and again as soon as possible after the aircraft lands; and

(iii) the temperature in each cargo hold with livestock must be monitored throughout the flight.

6 Reporting requirements

6.1 Reportable mortality rate

Draft recommendations

25) 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.

26) That the reportable level for mortalities for cattle and buffalo should be set at 0.5 per cent, or three animals, whichever is greater.

AAV comments/recommendations

AAV Opinion 1 and 2:

Reporting requirements need to be interpreted by competent personnel within the department. More use of regional veterinary officers to do this would be better use of skilled resources.

Please review the AAV ASEL submission to stage 1 which outlines views on the use of average mortality. The distribution of mortality rates are not normally distributed due to the nature of what it is measured. It is an inverse distribution, therefore, ***median*** values need to be used when describing the measure of central tendency. Using the mean ("average") overestimates the true measure of central tendency in these distribution because it is heavily skewed by the infrequent outlier events.

6.2 Contingency planning and reporting requirements

Draft recommendations

27) That the standards require 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.
28) 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 from the aircraft.
29) That the requirements for the end of journey report be updated as per Appendix E of this report to include more detailed animal welfare monitoring and to cover more aspects of the air export journey.
30) 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 department as soon as possible. The report should include details of any mitigating measures that have been employed to address the issue.

Appendix E Air export journey report

This report must provide a general overview of the air export journey, with mention of any specific issues relevant to the health and welfare of the livestock, and must include the following information:

Table 25 air export journey report

1	Approved premises/property
2	Departure airport(s) Total loaded, by species
3	Aircraft type(s) and airline(s)
4	Flight number(s) Date and departure time (of flight)

5

Details	Details and time (local)	Cumulative time off water (hours)
Curfew time – animals are removed from access to water (at premises or property)	For example curfew began at xx:xx	0
Loading time – time that the loading of crates began	For example loading began at xx:xx	4
Total flight(s) time–including any stopovers or transits	For example flight departed at xx:xx flight arrived at xx:xx	15
Time when animals are released from the crate (time when the last animal is out)	For example animals were unloaded from crates at xx:xx (local time)	19
Time when animals are first offered water	For example animals were offered water at the destination property at xx:xx	22
TOTAL water deprivation time		22

6

Transit stops
Feed and water
Access
Maintenance issues
Weather conditions
Ventilation

7	Flight conditions Weather conditions Temperature (where the livestock is kept) Ventilation
8	Health and welfare of livestock Number of livestock born during the journey Number of abortions Number of mortalities and details of mortality/cause of death Number, species of any animal that is affected by injury or ill health, including cause and any treatment. General behaviour of animals in flight (standing, resting, etc.) General demeanour of animals: Alert/active/lethargic/anxious/dull or other Effect on animals of any turbulence or alteration to ventilation inside aircraft.
9	Discharge airport(s) Date Comments on discharge operations

AAV comments/recommendations

AAV opinion 1 and 2:

The working group for air transport at the OIE Global Forum on Animal Welfare in Paris April, 2019 discussed the need for electronic submission of documentation for animals transported by air. Reporting and certification should have an option for electronic submission of documentation as per other commodities exported from Australia. This reduces the risk of documentation being the reason for delays in journey times. Electronic documentation introduces the ability for submissions to be made remotely, and for documentation to be sent ahead of consignments. Streamlining clearance times for documentation and reporting can reduce the risk of delay and prolonging overall journey times for animals. Electronic submission of documentation, reports and certification is not only more efficient for dissemination of data, but also for collation of industry information.

AAV Opinion 3:

Reporting requirements need to be interpreted by competent personnel within the department. More use of regional veterinary officers to do this would be better use of skilled resources.

7 General

Draft recommendations

31) 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 conflicting with the ASEL, in which case the ASEL should apply.
32) That the department releases an Export Advisory Notice when the IATA Regulations are amended.

AAV comments/recommendations

AAV Opinion 1 and 3 :

IATA is the international regulations, if ASEL standards are to apply in preference ASEL standards at a minimum should meet IATA regulations.

AAV Opinion 2:

Supportive of below recommendations from ALEC ASEL stage 1 submission to the TAC 2018.

1. All references to IATA Live Animal Regulations should be deleted from ASEL v3.0. ASEL should be a stand-alone document that sets out all necessary animal husbandry and management requirements for Australian livestock exported by air.
2. A desktop study should be undertaken to determine: · which elements of the IATA Live Animal Regulations are relevant to the Australian livestock export industry; and · where the IATA Live Animal Regulations differ from ASEL requirements, Hogan and Willis research findings and/or current industry practice.
3. Incorporating Hogan & Willis and IATA legislation into abridged format to ASEL for Air.

8 Management Plans

The committee has recommended that ASEL is updated to require the use of management plans for certain activities when exporting livestock by air. The management plans should detail how the exporter intends to manage the heightened risk of animal welfare issues associated with the:

- export of young animals
- sourcing and export of miniature breeds and other livestock that do not meet the minimum liveweight requirements
- export of livestock during the third trimester of pregnancy
- export of livestock that have recently given birth
- export of livestock with young at foot
- penning arrangements for camels over 300 kg liveweight
- management of total water deprivation time during the air export journey.

General inclusions in a management plan

A management plan must include details of how the exporter will manage the sourcing and transport of these animals, in particular:

- The age, weight and breed (where applicable) of the animals covered by the plan
- Induction and sourcing activities – including weighing, inspection and segregation (if required)
- Animal health and treatments - including additional treatments or veterinary requirements
- Feeding and water requirements – details of any feeding programs/regimes
- Loading and penning arrangements – detail the process for selecting and stocking appropriate crates, including segregation where required
- Monitoring and inspections during the air transport journey – detail how the animal welfare will be monitored throughout the journey.

Total water deprivation time

A management plan for the total water deprivation time during the air export journey must include details of how the exporter will manage the water deprivation time for animals, in particular:

- Routine curfew arrangements
- Expected journey time – including from the premises to the airport, time spent at the airport prior to and including loading, total flight time and expected time the animals will be uncrated and offered water at the destination.
- Provision of water during delays or transit stops
- Contingency arrangements if the maximum water deprivation time is exceeded – including details of how animals can be provided water enroute or during transit

AAV comments/recommendations

AAV Opinion 1 and 2:

Management plans developed to manage animal welfare risks outside ASEL should be made in consultation with veterinary professional advice. Declarations of veterinary oversight could be submitted or viewed at audit.