

## **SUBMISSION**

### **On DRAFT REPORT**

#### **REVIEW OF THE AUSTRALIAN STANDARDS FOR THE EXPORT OF LIVESTOCK : AIR TRANSPORT**

I have the following comments to make on the draft report. I grew up on a farm and I have an interest in the welfare of farm animals. I write as a concerned member of the community.

I believe that standards must be based on morbidity as well as mortality.

I agree with the RSPCA that ASEL standards must provide welfare outcomes that are acceptable to the community and should not be based on the standards of other countries, especially countries with lower standards than those in Australia.

I believe the OIE standards are basic, and that our Australian standards should be stricter than this to set an example to poor welfare countries.

At present, with continuing recent disastrous events like the *Maysora* unloading of cattle in June this year in Israel, for example, Australia is not setting a good example to the community and the rest of the world.

I make the following comments:

#### **2. Sourcing and Preparation**

The minimum live weight for sheep should be increased to 24 kg and for goats to 18 kg. If, as the draft report states, lesser weighted animals would be small or young, this is not acceptable, because obviously these younger animals would be vulnerable and suffer stress.

#### **2.2 Deer and Camelids**

The ASEL standards should be used as well consignment specific standards. No feral deer or camelids should be exported as they would suffer extreme stress as they are unused to human handling.

#### **2.3 Pregnancy testing**

It should be certified in writing that cattle are no more than 180 days, 200 for buffalo, and 99 days for sheep. Testing should be done by a registered vet.

#### **2.4 Non-farmed stock – feral**

I do not believe feral animals should be exported. It is not possible to 'condition' wild animals to human contact in a few days. The suffering due to lack of experience of human contact is inhumane and would be unacceptable to the community.

#### **2.5 Vulnerable animals**

Animals with accompanying young should not be exported

#### **2.7 On farm preparation of livestock**

A period of 24 hours' respite before being re-transported is too short. More consideration should be given to the cumulative effect of stress on transported stock.

### **3. Penning arrangements and crate design**

Rounding up of stocking densities is unsatisfactory and has health and welfare risks. Alpacas and camelids require plenty of room for their heads. This is not a 'subjective' conclusion, but one based on their physical attributes and good welfare.

### **4. Fodder and water requirements**

There should be consignment specific management plans. The time off water should be a maximum of 12 hours.

### **5. Inspection of livestock**

Conditions should be monitored continuously during the flight period by a competent accredited person. Stock should not be left on the tarmac or elsewhere where they could be exposed to adverse weather conditions. If airport facilities are not up to standard, stock should not be on aeroplanes in the first place.

### **6. Reporting requirements – mortality rate**

Because air journeys are much quicker than sea voyages, the reportable mortality rate must be considerably reduced compared with that for sea voyages. For example, 0.5 for sheep, goats, camelids and deer and 0.2 for cattle and buffalo. Therefore, I do not agree with the draft report recommendation. Why is there no accounting for morbidity (suffering) on live export by air? I am sure the community would expect and want this.

### **6. Contingency Planning and reporting**

In addition to the draft recommendation, monitoring and reporting on ammonia levels in crates should be undertaken.

### **7. General – IATA**

It is important that ASEL be applied to air transport of livestock as well as IATA regulations. Both should apply, with ASEL overriding where appropriate. It is thus important that ASEL is reviewed more regularly based on mortality and morbidity reports and other events such as delays and the effectiveness of contingency plans.

### **8. Management plans**

I maintain that if the risky exporting of young, vulnerable animals, those that are in later stages of pregnancy and those with young at foot, for example, were avoided, the need for special management plans in those cases would not arise - and instead management planning could focus on the welfare of those animals that *are* suitable for live export by air. By highlighting that such vulnerable animals require specific management plans, the committee is highlighting that those vulnerable livestock should never be put on aeroplanes in the first place and that all energy should be focusing on the welfare of animals deemed suitable for export.

Jan Kendall

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