AVA Submission:
Issues paper - Review of the Australian Standards for the Export of Livestock: Air Transport

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Submission from the Australian Veterinary Association Ltd

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AUSTRALIAN VETERINARY ASSOCIATION

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About us

The Australian Veterinary Association is the national organisation representing veterinarians in Australia. Our 9,500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

Discussion

The AVA's responses to the Issues Paper questions are provided below.

3.1 Questions about liveweights for livestock exported by air

AVA supports increasing the minimum liveweight of sheep to 24kg and of goats to 18kg, as in both cases, the slightly more mature individuals will be better able to cope with the stress of transport.

Other species:

The 150kg minimum weight for cattle is appropriate.

The minimum liveweight for export of alpacas and llamas should be 20kg. Animals 3 months of age that have not achieved that weight are suffering ill thrift.

Consignment-specific management plans are recommended for miniature breeds.

3.2 Questions about deer and camelids

Consignment-specific management plans are recommended for any export containing deer or camelids.

3.3 Questions about pregnancy testing requirements

AVA supports the maximum days of gestation at scheduled date of departure for cattle and buffalo.

Fat-tailed sheep provisions: Fat-tailed sheep including Damara sheep can conceive from 30 kg, so it is recommended that the requirement be that all of these sheep over 30 kg (not 40kg) must be determined to be not detectably pregnant before transporting.

Section 3.3.4 and Appendix B pregnancy testing requirements:

Definition of competent pregnancy tester is not supported. Pregnancy testing of all species other than sheep should be performed by a registered veterinarian. Pregnancy testing of ALL cattle and buffalo, whether breeder or for slaughter, should be by a Pregcheck®-accredited veterinarian.

Note: AVA does not support Appendix B Section (c) which allows for non- Pregcheck®-accredited veterinarians to perform pregnancy diagnosis on cattle or buffalo undergoing voyages less than 10 days duration. All air transport is less than 10 days. This should be amended to also require a Pregcheck®-accredited veterinarian.

Further discussion follows:

ALL *cattle and buffalo* should only be pregnancy tested by a Pregcheck®-accredited veterinarian. Pregcheck® accreditation requires veterinarians to demonstrate a high level of skill in detection of pregnancy and estimating gestational age. Use of a Pregcheck®-accredited veterinarian provides assurance that pregnancy testing of breeder cattle is performed with sufficient accuracy to ensure good animal welfare outcomes, and meet the expectations of community, exporters and importing countries.

Pregnancy diagnosis of camelids and deer should be performed by a registered veterinarian for the following reasons:

- Registered veterinarians have professional and legal obligations to conduct veterinary procedures with a high degree of competence, and to certify the health, freedom from disease and physiological status of animals. Veterinarians are legally and professionally accountable for their activities and this provides a significant level of assurance and accountability to industry, exporters and importing countries that pregnancy testing has been performed diligently and with a very high degree of accuracy.
- Current training and accreditation standards for non-veterinary "accredited cattle pregnancy testers" in the relevant state or territory is inadequate and provides a very poor level of assurance of competency and high risk of poor compliance with resultant poor animal welfare outcomes.

Pregnancy diagnosis of sheep and goats must be done by transabdominal ultrasound. Use of electronic ID (see 3.1, above) is strongly recommended to allow trace back when lambs are born, to identify poor operators. Lay operators are generally accurate at pregnancy testing sheep (* note exception below), but they and farm management must ensure attention to detail at every step during testing and drafting, so that only correctly tested animals are transported.

Re: Table 4 – Maximum days of gestation at scheduled date of departure:

In practice it is very difficult to determine with accuracy if cattle are < or > 250 days gestation, even for very experienced Pregcheck®-accredited veterinarians. In reality, often the best we can do in very late gestation cows is provide a professional judgement that the animal(s) are not imminently going to calve (ie during the airfreight process).

* Similar issues apply for sheep and other species in late gestation, and lay sheep scanners may not have sufficient expertise to accurately differentiate gestational age at 115 days. Thus the AVA recommends that pregnancy diagnosis in these circumstances should only be performed by a veterinarian (for pregnant sheep).

3.4 Questions about non-farmed livestock requirements

AVA supports the proposal for revision of standards for non-farmed livestock, in particular wild caught animals.

Non-farmed, non-domesticated and wild-caught animals are likely to suffer additional stress as they are not adapted to human contact, confinement and transport. Deer also have lower tolerance to handling and should be managed carefully to avoid additional stress. Further research on welfare impacts and conditioning times for these groups of animals is warranted, to inform the development of best-practice guidelines for transport of each non-domesticated species.

It is essential that these animals have sufficient time to adapt to handling, and eating and drinking from troughs prior to export. Time frames for adaptation should not be prescribed but instead, consignment-specific management plans are recommended so that each situation can be assessed and judged on the particular animals' circumstances. Animals that are unable to adapt are not fit for transport.

3.5 Questions about vulnerable classes of livestock

As above, consignment-specific management plans are recommended for vulnerable classes of livestock, including those with young-at-foot.

3.6 Questions about livestock with horns

AVA supports the requirements as outlined, with the exception of the mention in section 3.6.3 of removal of horns in cattle to a diameter of 3cm. The Australian Animal Welfare Standards and Guidelines for Cattle (2016)[1] state in guideline G6.24: "*Tipping should only remove a solid, nonvascular portion of the horn, and result in a blunt horn end*". There is no mention of 3 cm diameter.

It is appropriate to have a maximum allowable horn length. If trimming the non-vascular portion of the horn results in a horn exceeding the maximum length, then the beast is not fit for shipping.

3.7 Questions about on-farm preparation of livestock

The standards should define a maximum travel time from the property of origin, to the airport, and this should be related to the anticipated total journey time to the overseas destination. Ideally, there would be a minimum rest time defined for situations where livestock are returned to the property of origin for any unforeseen reason, prior to being re-loaded onto trucks for transport again. Rather than this being a prescriptive time, it may be better to aim for outcome-based standards (animals well rested, eating and drinking, and fit to re-load).

[1] The Australian Animal Welfare Standards and Guidelines for Cattle (2016) are at: http://www.animalwelfarestandards.net.au/cattle/

4. Questions about stocking density

The AVA supports allometric principles in determining appropriate stocking densities for livestock. For relatively short land journeys, where animals can remain standing and do not need to move around, eat or drink, a *k*-value as low as 0.020 may be appropriate, noting that animals at this density would be tightly packed and have difficulty lying down and standing up (Petherick and Phillips 2009).

As air transport can involve prolonged travel times in crates, a *k*-value of 0.025 - 0.027 is recommended as a minimum. At this stocking density, animals will all be able to lie down simultaneously (without necessarily allowing ability to rise or free movement).

Lower stocking rates in lower cargo compartments - despite often being cooler than the main deck, the addition of extra space in these lower compartments may be warranted because of reduced ventilation efficiency in mixed cargo consignments.

The provisions for "rounding up" numbers would ideally be reversed, and "rounding down" used as a precaution.

Requirements for all camelids should be on a consignment specific management plan basis. There should not be mixing of different sized animals.

Requirements prohibiting mixed sex loading are supported.

Generally, crate design in relation to head height needs to follow IATA regulations to suit dimensions of aircraft and aircraft openings.

5. Questions about water requirements

The AVA supports a recommendation that consignment-specific management plans should be in place to manage maximum water deprivation time for the entire journey (from property of origin to destination) for all air transport of livestock. At a minimum, consistency with the Land Transport Standards is recommended.

In particular, consignment-specific management plans should be used to manage provision of water during transit stops. Transit stops are more likely on longer journeys as exporters usually prefer non-stop trips if possible. Transit stops are often in hot locations, and can add hours to the journey, so water management is especially important.

6. Questions about inspection of livestock

The AVA supports the current requirements for inspection of livestock during air transport. Facilities at airports are generally suitable to allow adequate inspections. Treatment of livestock during transit can be difficult, due to difficulties accessing individual animals, however use of captive bolt or sedation may be possible for animals on the main deck. Pens are usually covered with cargo nets which severely restricts access.

7. Questions about reportable mortality rates, contingency planning and reporting

Reportable mortality rates in 7.1.2 are acceptable, noting however that generally mortality should be zero, unless there is a major failure of air conditioning or pressurisation.

The definition of “notifiable incident” is adequate, however consideration could be given to adding ‘severe turbulence’ to this list.

References

Petherick, J. C. and C. J. C. Phillips (2009). "Space allowances for confined livestock and their determination from allometric principles." Applied Animal Behaviour Science **117**: 1-12.

Contact:

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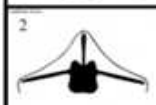
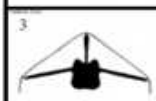
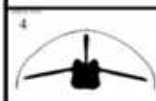
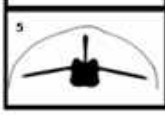
SUPPLEMENTARY INFORMATION PROVIDED BY AVA

On page 10 ASEL-air-issues paper states " the body condition tables that were recommended by the committee are in Appendix A

I was perplexed that the table for sheep in appendix A is "table 8 "sheep body condition scoring " is not consistent with the table below developed by "Life Time Ewe" program This is an $11 million program that had an experimental phase 2000-2005 and since then over 30% of Australian Sheep producers have completed a 1 - 2 year training course where 50 sheep at each of the 6 per year training days from each producers property are condition scored based on the table below. All major industry bodies (AWI MLA and the Sheep CRC use these recommendations).

1 	**Backbone** The bones form a sharp narrow ridge. Each vertebra can be easily felt as a bone under the skin.. There is only a very small eye muscle. The sheep is quite thin (virtually unsaleable)	**Short Ribs** The ends of the short ribs are very obvious. It is easy to feel the squarish shape of the ends. Using fingers spread 1cm apart, it feels like the fingernail under the skin with practically no covering
2 	**Backbone** The bones form a narrow ridge but the points are rounded with muscle. It is easy to press between each bone. There is a reasonable eye muscle. Store condition- ideal for wethers and lean meat.	**Short Ribs** The ends of the short ribs are rounded but it is easy to press between them. Using fingers spread 0.5cms apart, the ends feel rounded like finger ends. They are covered with flesh but it is easy to press under and between them.
3 	**Backbone** The vertebrae are only slightly elevated above a full eye muscle. It is possible to feel each rounded bone but not to press between them. (Forward store condition ideal for most lamb markets now. No excess fat).	**Short Ribs** The ends of short ribs are well rounded and filled in with muscle. Using 4 fingers pressed tightly together, it is possible to feel the rounded ends but not between them. They are well covered and filled in with muscle.
4 	**Backbone** It is possible to feel most vertebrae with pressure. The back bone is a smooth slightly raised ridge above full eye muscles and the skin floats over it.	**Short Ribs** It is only possible to feel or sense one or two short ribs and only possible to press under them with difficulty. It feels like the side of the palm, where maybe one end can just be sensed.
5 	**Backbone** The spine may only be felt (if at all) by pressing down firmly between the fat covered eye muscles. A bustle of fat may appear over the tail (wasteful and uneconomic).	**Short Ribs** It is virtually impossible to feel under the ends as the triangle formed by the long ribs and hip bone is filled with meat and fat. The short rib ends cannot be felt.