



CATTLE COUNCIL OF AUSTRALIA

17 May 2019

Technical Advisory Group Secretariat
GPO Box 858
CANBERRA ACT 2601

By Email: tacsecretariat@agriculture.gov.au

Dear Committee Secretariat

Review of standards for the export of livestock by air — Australian Standards for the Export of Livestock

Cattle Council of Australia welcomes the opportunity to respond to the issues paper arising from Stage 1 of the review of standards for the export of livestock by air — Australian Standards for the Export of Livestock (ASEL).

Cattle Council is the peak industry body representing Australian beef cattle producers and advocates on behalf of the broader cattle industry, including the families and communities whose livelihoods depend on the future of the livestock export industry. With over 70% of all Australian cattle production exported (to over 78 countries), at a value of A\$8 billion in 2017/18, it is vital that Australia has a regulatory framework that is able to foster further development of the beef industry into the future.

The modernisation of livestock export supply chains helps secure the long-term viability of the trade and encourages producers and associated industry employees and businesses to invest in its future. Cattle Council continues to have a significant interest in the review of the ASEL and welcomes the opportunity to provide further input into this process.

Cattle Council supports the Australian Livestock Export corporation Ltd (Livecorp) and Australian Live Export Council (ALEC) submissions to this process. In addition to the specific feedback on questions posed in the issues paper provided by Livecorp and ALEC, the Cattle Council would like to make the following general comments.

While a relatively small number of beef cattle are exported via air compared with sea voyages, increasingly over the last 12 months, the demand for feeder and slaughter cattle transported by

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air has grown¹, where previously the predominate export category by air was breeding cattle. However, Cattle Council believe that in the future, the opportunity exists for significantly larger number of both feeder and slaughter cattle to be exported by air as cost efficiencies are reached.

Cattle Council are supportive of the current ASEL standards for air transport. To this end, Cattle Council would urge caution on changing ASEL in regards to air transportation for the sake of change, and instead suggest aligning the standards to existing international standards. Given the lack of synchronicity between reviews of Australian and international standards, Cattle Council recommends that international standards, where applicable, be referenced, rather than reproduced, in the Australian standards.

Australia over the last decade have had significant revision of its animal welfare standards, and industry continues to monitor and adjust its culture to ensure optimal animal welfare outcomes. Industry have been active in developing a 'fit to load guide', to ensure that domestic transportation of livestock delivers prime animal welfare outcomes.

Currently there are exceptionally good animal welfare outcomes achieved through air transportation of livestock, due to the already entrenched culture and well-established regulations imposed by airlines when transporting livestock. As demonstrated in the Department of Agriculture and Water Resources records for mortalities of livestock transported by air, from 2014-2019 mortality averaged at 0.0 percent. Cattle Council supports the position put forward in the submissions of ALEC and Livecorp of aligning ASEL air with the international standards that currently exist for transportation of livestock by air.

Cattle Council do not support the use of allometry for air transport, as adopted in the sea transport review. Cattle Council assert that any changes to space allocations that deviate significantly from current international standards for livestock transportation by air could result in potential violations of the World Trade Organisation rules and potential unintended negative animal welfare outcomes. It is critical for future trade that Australia [as a signatory to the World Organisation for Animal Health (OIE)], aligns its domestic regulation (in the same manner as it does for exports as it currently does with imports) with international standards.

In relation to the suggestion within the issues paper of having a competent handler accompany each consignment, where feasible, Cattle Council believe that there could be some merits to this suggestion particularly in regards to loading and unloading of the animals to ensure optimal animal welfare outcomes. The greatest potential risks for animals transported by air occur during loading and unloading or at transit stops or when aircraft is diverted. Cattle Council believe that this suggestion could assist in achieving optimal welfare outcomes, particularly if an aircraft is diverted or for transit stops, but is not necessary for lower hold freight or passenger consignments due to the lack of accessibility to monitor the consignment.

It is not common practice for cattle that have horns be exported by either sea or air. It is well recognised by industry that dehorning mature cattle is not good animal welfare practice. When well-developed horns are cut to less than 12 cm in length, the vascular portion of the horn is invariably exposed, with intensive bleeding. In relation to the question as to whether the requirements for horned cattle, buffalo and sheep in section 3.6.3 of the issues paper be adopted

¹ <http://www.agriculture.gov.au/export/controlled-goods/live-animals/live-animal-export-statistics/livestock-exports-by-air>, sourced 13/5/19

for air transport, Cattle Council believes there would be merit in achieving harmony between ASEL and the Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock, with a common requirement for horns to be tipped to a diameter of three centimetres (and no other requirements).

Cattle Council believe that any changes made to ASEL should be aimed at delivering improved animal welfare outcomes. The proposal to limit travel time to an 8-hour maximum from an Approved Premises to an airport is not supported by Cattle Council as it would negatively affect the economics of transporting livestock by air without delivering any additional welfare outcomes. Provided animals are adequately rested, watered and fed on route to the airport, animal welfare outcomes are currently high, thus any requirement regarding distance/time on route to the airport should be measured from the last loading point where animals were watered and fed.

Cattle Council urge the TAC to be cognisant of the cost implications to changing the standards, where there is little option to improve animal welfare outcomes (as they are currently very high). The current standards for transporting livestock by air are working well and as such, no reason exists to add to regulatory burden with additional layers of ASEL requirements.

On behalf of its members and the broader industry, Cattle Council is grateful for the opportunity to play an active, ongoing role in these important reforms. Should you have any questions regarding this submission please do not hesitate to contact us

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Andrae', written in a cursive style.

Margo Andrae
Chief Executive Officer
Cattle Council of Australia