



Cattle pregnancy testing and ovarian scanning for commercial purposes and scientific research

Submission from
Australian Cattle Veterinarians and
Queensland Division
Australian Veterinary Association Ltd

To:
Department of Agriculture and Fisheries

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www.ava.com.au



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The Australian Veterinary Association submits informed comment on the proposed changes to regulations around cattle pregnancy diagnosis and ovarian scanning.

About us

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9500 members come from all fields within the veterinary profession. Clinical practitioners work with livestock, companion animals, horses, wildlife, conservation and zoo animals. Government and institution employed veterinarians work with animal health, public health and biosecurity. We also have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association. The AVA has a range of special interest groups (SIGs), allowing members with shared interests or expertise to develop their practice and skills in a specific area. These include Australian Cattle Veterinarians, Conservation and Biology Animal Welfare and Ethics, Public Health, Equine and Sheep.

Executive Summary

Recommendation

AVA strongly advocates that pregnancy diagnosis remains an act of Veterinary Science. The deregulation would have massive impacts on **biosecurity, animal health and welfare**, as well as veterinary practice sustainability.

Supporting comment on the recommendation

Cattle producers need accurate and reliable pregnancy diagnosis. Veterinarians provide vital information on reproductive diseases, welfare and biosecurity. This advice is crucial to farm productivity and sustainability.

An active and functional biosecurity system is a key component of our Australian biosecurity system, and provides the foundational support for our clean, green image in overseas markets. Our relative disease-free status enables us to enjoy access to many markets, in comparison to other countries.

Both the national CVO Mark Schipp and the Queensland CVO, acknowledge the importance of a biosecurity partnership with private veterinarians. A cornerstone of our submission outlines the situation that has occurred in WA since deregulation. The corner store analogy – if you don't use the corner store it will shut down. The number of veterinarians servicing the production animal market in WA has contracted. Producers now pay a penalty when engaging veterinary services because travelling times have increased. This outcome in a geographically disperse state such as Queensland will be catastrophic. This will lead to a long-term cost to our beef industry rather than the likelihood of any cost savings.

Further lay pregnancy testing can only lead to serious and detrimental biosecurity outcomes for Queensland's trade relationships and obstruct any necessary biosecurity responses in the face of a disease outbreak.

Ensuring acceptable animal welfare standards are maintained with accurate certification of an animal's health and pregnancy status is paramount for the Queensland beef industry to maintain its social licence and to continue to operate. Issues with live sheep export indicates that our accreditation schemes need to be strengthened and not relaxed if we are to maintain Australia's \$1.35B export trade.

Certification is a key issue that has not been addressed in the RIS. Pregnancy diagnosis of cattle is an act of veterinary science, as is the signing and issuing of certificates relating to the description, health, diagnoses and treatment of animals. In the same way you are required to visit a doctor for a sickness certificate. Certification by a professional is universally accepted as written proof of evidence in most situations and countries.

This submission provides details relating to a number of aspects missing from the RIS, particularly around cost benefit analysis.

Response to the consultation

Certification

Pregnancy diagnosis of cattle is an act of veterinary science, as is the **signing and issuing of certificates** relating to the description, health, diagnosis and treatment of animals. In the same way a doctor needs to sign a sickness certificate, certification by a professional is universally accepted as written proof of evidence in most situations and countries.

Social licence and cattle industry sustainability

The live export trade has become an integral part of the Australian cattle industry and even temporary cessation of the trade causes catastrophic effects as was evidenced in 2011. Ensuring acceptable animal welfare standards are maintained and that there is rigor in our certification on animal health and pregnancy status is paramount for the Queensland beef industry to maintain its social licence, and to continue to operate. Recent issues that have arisen with live export of sheep indicate that our accreditation schemes need to be strengthened and not relaxed to maintain the live export trade worth \$1.35 billion to Australia.

The PREgCHECK™ system

The Australian Cattle Veterinarians PREgCHECK™ scheme enjoys the benefit of over 1,000 members and complaints are covered by registration fees charged by that association. This scheme and the Australian Cattle Vet members have supported the Australian Cattle industry for many years. The PREgCHECK™ has developed into what is arguably the best in the world for certification of pregnancy in cattle. Any issues or complaints relating to certification are handled by the professional body (ACV) that operates the scheme. In summary, the PREgCHECK™ scheme is underpinned by: -

- Previous acquired knowledge of a veterinary degree which automatically includes training in anatomy, diseases, physiology and basic manipulation of the reproductive tract of cattle.
- Registration as a veterinarian with the relevant State Veterinary Surgeons Board (sometimes multiple) and membership of the Australian Veterinary Association and Australian Cattle Veterinarians.
- A comprehensive 95-page manual “Pregnancy Diagnosis in Cattle” that covers all aspects of pregnancy diagnosis.
- A log demonstrating that any prospective veterinary graduate has manually palpated a minimum of 2,000 animals prior to examination.
- Basic rules to follow where uncertainty exists e.g. “Never put an empty tag on an animal unless you have palpated the empty uterus”.
- A test by an accredited examiner on 100 animals with zero tolerance on positive or negative animals and guidelines for the prevalence of pregnancy status in the mob on which the examination is conducted.
- A certified examiner who has at least 5 years’ experience and who has tested >20,000 head.
- Individual identification (normally a colour coded tail tag) of every animal tested that is traceable back to the individual veterinarian who performed the test.
- A certification that accompanies each mob tested which lists the ID of all animals in the mob along with any tail tags that have been replaced.
- A traceback system to investigate all complaints.

- A random annual audit system.
- Potential deregistration by the Veterinary Surgeons board for professional misconduct as a veterinarian and automatic loss of accreditation.

For a lay pregnancy tester, the only recourse is the civil court, and outcomes would be highly dependent on the individual's financial and insurance situation. At present there is no insurance policy that would cover a lay pregnancy tester.

Biosecurity and risk to Queensland markets

An active and functional biosecurity system is a key component of our Australian biosecurity system, and provides the foundational support for our clean, green image in overseas markets. Our relative disease-free status enables us to enjoy access to many markets, in comparison to other countries. Zoonotic disease can threaten the lives of the producers and their families, but even non-zoonotic diseases can threaten their livelihoods, as trade sanctions are likely in a disease outbreak situation. Both the national CVO Mark Schipp and the Queensland government through Biosecurity Queensland, acknowledge the importance of a biosecurity partnership with private veterinarians. This is needed because of the decline in government veterinary services, both at the state level (across all jurisdictions), and the national level within the Department of Agriculture and Water Resources.

This partnership approach is acknowledged by states and federal governments through the Intergovernmental Agreement on Biosecurity (IGAB) schedule 4 which is to enhance programs that build capability in both the public and private sectors, and the community for the early detection of pests and diseases.

Private veterinarians are key to ensure passive disease surveillance is carried out, and it is the key to early detection and validating disease status. A key part of this disease surveillance is on-farm veterinary visits as these are critical for herd health, biosecurity, animal welfare and disease detection. Through this system private veterinarians are able to support the Queensland Government without any direct cost.

Queensland is different to other states, both with the provision of government veterinary services and the extensive production livestock systems. The reality is that without pregnancy diagnosis there will be very little, if any, reason for veterinarians to come onto properties in an extensive beef livestock system. In the southern states with more intensive practices, including dairy, there are many reasons for veterinarians to interact with, and provide services to, producers. There has been AGforce media on why Queensland doesn't have what NSW has, however in NSW there is extensive network of LLS vets who play an important role in biosecurity, and Queensland does not have this resource.

Lay practitioners get on farm, undertake the work as quickly as possible, and do not have the training to evaluate animal health issues that could be an indication of a disease outbreak. In an emergency response situation large numbers of personnel are required. During the 2007-08 equine influenza response, large numbers of veterinarians from the private sector were employed to perform field operations such as performing field surveillance and to assist in control centres.

NAQS utilising Agricultural White Paper funds is undertaking a program called the Northern Australia Biosecurity Surveillance project (NABS) which is aiming to strengthen disease surveillance activities across vet practices in northern Australia. This leads to the current situation where there are conflicting state and federal government messages on the role of rural veterinary practitioners. If the Queensland government supports changes to deregulate cattle pregnancy diagnosis, this will reduce rural veterinary practice viability and reduce or eliminate private veterinary surveillance on rural properties. It is the corner store analogy – if you fail to use it then it shuts down. There are serious statewide biosecurity implications arising from the proposed changes. The Queensland government has reduced the active surveillance capacity on the ground with reductions in staffing at Biosecurity Queensland. As stated at public forums by the Queensland CVO, private veterinarians play a very important role in providing this capacity, both for passive surveillance, and as capacity in the event of an outbreak. However, if there is no reason to go out to a property, then we can't undertake this role,

and it will mean that the Queensland government will need to fund this activity. Additionally, it is only larger practices with multiple veterinarians that are able to provide assistance in an outbreak situation. A reduction in income from pregnancy diagnosis will result in a reduction of veterinarians in multi vet practices in rural areas and will mean that there are no resources available to the government in the event of an exotic disease incursion. Modelling has already shown that veterinarians would be the most critical resource to be depleted in the event of a modest outbreak of FMD and was certainly the case in the UK FMD outbreak in 2001.

Internationally it is recognized that private veterinarians are a key component supporting Australia's strong animal health status which in turn underpins our capacity to access international markets. A 2015 report by the OIE's on Australia's Performance of Veterinary Services (PVS) recognises the collaborative approach to maintaining our animal health status and the benefits that brings Australia—it is something we could not achieve without the assistance of Australia's nearly 13,000 registered veterinarians.

Australia's and Queensland's reliance on exports requires continual increases in production, value and safety. Australia's modest population and gradual consumption growth leads many Australian farmers to depend on new international markets to expand and maintain profitability. A high animal health and food safety status is of cardinal importance for Australia. Queensland is heavily reliant on agricultural exports, particularly beef. The Australian Veterinary Association questions why Queensland is seeking to weaken the backbone of the states biosecurity and animal health security.

Specific Comments on the Regulatory Impact Statement (RIS)

The RIS as presented fails to provide a balanced, or adequate overview of the situation. There are unfortunately anecdotal assumptions which very much weaken the validity and robustness of a Regulatory Impact Statement. Apart from this there is also much that the RIS does not include. We will address both the inaccuracies, and the missing information separately.

Putting the RIS into Perspective

1. **Cost benefit analysis:** The RIS states that it is impossible to provide a meaningful cost benefit analysis of the situation, however given the low-cost savings that the RIS details of \$1.58M, we believe that some form of cost benefit analysis is essential. The Queensland government has undertaken cost benefit analysis on outbreaks such as FMD, and these do demonstrate the costs.
2. **Costs of pregnancy diagnosis in the RIS are highly inflated:**
 Veterinary practices use a number of different models for pregnancy diagnosis. Some are based on a per head basis, some on an hourly rate and some on a combination of these and a rate per kilometer travelled to the diagnosis property. In the far north of the state the cost of pregnancy diagnosis services tends to be lower due to larger numbers, and far lower than the \$5/head that the RIS states, as the table below demonstrates. These figures were obtained from practices in October 2018.

Location	Cost (incl GST unless stated)
Hughenden	\$2.09/head, \$1.65/km travel
Goondiwindi	\$90 first cow \$2.75 /head or \$272.73/hr (excl GST)
Mt Isa	First 50 head \$8.75 each Then \$2.40/head
Clermont	\$3.00/ head incl GST Flag fall of \$88.00 if under 100 head NLIS certificate - \$4.00 per head With tags - \$4.50 per head Travel \$1.76 per km incl GST
Cloncurry (and servicing Gulf) – 3 veterinarians plus two mobile veterinarians	\$2.20/head \$2.53/ head for boats and use of NLIS reader

3. **Projected cost savings with lay pregnancy testers**

The RIS details a projected annual cost saving across Queensland of \$1.58M per year. In comparison to the value of the Queensland Beef Industry, with a gross value of beef production at the farm gate valued at \$5.07 billion in 2014-15, these projected saving are very small. In the table above, we can see whilst there is a variation of costs between practices and across the state, that the cost is closer to \$3 per head. For a comparison, an illegal lay pregnancy tester operating in Julia Creek is currently charging \$2.00 a head, and \$1.50/km travel, so for the Cloncurry and Gulf region there is very little difference in cost, and thus potential savings to the producer. Lay testers operate on a commercial basis similar to veterinarians.

There are several factors more directly related to the cost of pregnancy diagnosis, and these relate to the facilities on farm, which are frequently unsafe, poorly functional and sometimes nonexistent. A functional crush will increase operator speed, and thus reduce the cost of service per animal. Practices with clients that provide functional, safe facilities frequently charge much lower than 'average' rates, and certainly lower than lay operators typically charge. Producers in Queensland would be much better off if advised to focus on the cost savings, that can be achieved by having functional handling equipment. There are substantial direct costs contributed by unsafe and poorly functional handling equipment. The primary driver of Pregnancy Diagnosis costs are the facilities through which cattle are processed, including whether or not there is a safe, functional vet crush. Second most important driver is the stockmanship of the operators providing assistance and the third factor is how organised they are.

4. **Location of veterinarians in Queensland:** The RIS finds there are inadequate veterinarians in the channel country, however there is a Cloncurry based practice that has three veterinarians, plus an additional two mobile veterinarians. The Hughenden practice has four veterinarians.
5. **Importantly, potential costs associated with the RIS proposal include a lack of timely advice on herd production problems.** Veterinarians can provide science-based advice on herd production problems that will optimise production. Lay testers are not trained to do this. As an example, dystocia in cattle has been estimated to cost the national beef herd in excess of \$50 million/year. It is increasingly evident that dystocia is a major cause of calf loss in the northern beef production areas. Veterinarians can provide professional advice on how to mitigate this problem. A questionable cost-saving of \$1.58 million touted in the RIS pales to insignificance in comparison to the influence of just this one example.

What's missing

6. **Export certification or lay testing across the entire state:** There would appear to be two distinct issues here and the arguments for lay pregnancy diagnosis don't apply equally. Firstly, there is the perceived need to use lay pregnancy testing to service a live export industry which may involve as few as 80,000 heifers a year and secondly there is an argument for lay pregnancy testers to charge for services over the whole of Queensland which is largely well serviced by cattle veterinarians and lay testing who can operate in their own businesses.
7. **Risk profiles of supply chains:** There is no understanding demonstrated of the different risks of cattle in various supply chains. Risks associated with stud breeders vary dramatically from those associated with live export.
8. **The facts on lay testing schemes in WA and NT:** The impact statement indicates that successful lay pregnancy testing schemes are operating in both WA and the NT but fails to state that there are only three lay pregnancy testers working in WA and that they must operate under the supervision of a registered veterinary surgeon. The document also portrays a lay pregnancy testing scheme that is working very successfully in NT but fails to provide account of the serious

flaws uncovered in an investigation undertaken by Dr Geoff Neithe in 2015 i.e. four years after the live export ban, which is contained in the appendix.

9. **Providing certification acceptable to importing countries:** The report suggests that pregnancy diagnosis should not be classified as an act of veterinary science and compares it with other procedures such as artificial insemination and semen testing. However, it fails to outline that the provision of a certificate is also deemed an act of veterinary science and this is an extremely important aspect of the bigger picture under consideration here, especially when it comes to export certification.
10. **The decline in the proportion of females being exported as feeders:** The writer intimates on page 23, that 50% of the export cattle in Queensland are female without any supporting documentation but this would appear not to be the case as it is probably closer to 20%. If this claim of 50% is true, then it should be substantiated with some accurate data.
11. **The role of pregnancy diagnosis in specific regions of Qld:** The document provides a table of breeder numbers for Queensland and the veterinary density servicing those regions. For instance, it reveals there is only one vet per 185,814 head in the desert channels but then fails to explain that probably none of these cattle will ever be destined for the live export market as it is basically a fattening region. Well in excess of half of these cattle are bullocks. Similarly, it provides data to show low veterinarian to breeder cow numbers in the northern and southern gulf but fails to reveal how many of these animals are actually routinely pregnancy diagnosed each year as normal management practice; especially where the 12-month inter-calving intervals are very low. The Cash cow project showed that only 17% of breeders ≥ 4 years of age have a 12 month inter calving interval in these regions.
12. **A confusing case study:** The regulatory impact statement provides a case study from Yelvertoft Station which is located between Mt. Isa and Cammowéal and then attempts to explain mileage costs being greater to get a vet from Mt Isa compared to Cloncurry – the only problem is, Yelvertoft is much closer to Mt. Isa than it is to Cloncurry. Even lay pregnancy testers operating illegally in Queensland currently charge mileage. All lay pregtesters working on the black market operate commercially apparently using prevailing veterinarian pricing structure.
13. **A proposed accreditation scheme without essential integrity:** The favoured accreditation scheme as proposed by Agforce sounds good on the surface as it includes
 - a. Completion of a unit of competency/certificate of attainment
 - b. access to the accreditation tool to record a period of practice and repetition to develop reliable testing skills and
 - c. examination and certification.

This process is rather analogous to going from 'L' plates to 'P' plates after acquiring a driver's licence. However, the proposed scheme fails to mention the essential elements of any accreditation scheme and these are the need to include individual identification of the animals at the time of the testing, the accompanying certification that details animal ID with test results, the audit scheme and the traceback mechanism for breakdowns.

14. **The cost of compliance and transparency:** The impact statement proposes that the accreditation scheme should be run as pilot in Queensland for 20-30 lay testers but has not mentioned the cost of accreditation, auditing of the scheme and most importantly who will pay for market failure when a complaint in a feedlot has to be investigated overseas. The Australian Cattle Veterinarians PREgCHECK™ scheme enjoys the benefit of over 1,000 members and complaints are covered by registration fees charged by that association.

15. **Details lacking on the quality of the proposed lay testing service:** The favoured option is an accreditation scheme for lay pregnancy testers in Queensland but it fails to provide any detail on the quality of the proposed service. A pregnancy testing scheme that simply denotes non-pregnant versus pregnant animals is a completely unsatisfactory outcome for an industry that wishes to manage its reproductive performance and to identify where losses are occurring. Foetal aging must be part of any pregnancy diagnosis scheme. If the proposal is to introduce a scheme similar to the one which exists in the NT, then this would be a retrograde step for both the domestic and export beef industries.
16. **The reality of a national lay pregnancy testing scheme:** The writers suggest that a national accreditation scheme is almost a *fait accompli* and that it would therefore be able to be self-funded as there would be presumably much greater membership at a national level. However, the logic, or need for lay operators in southern states to join a national scheme has not been realistically explored. The simple facts are that no female feeder or slaughter cattle ever originate out of the southern states and lay pregnancy testers cannot certify breeding cattle for live export under ASEL requirements. There are no identifiable advantages for lay pregnancy testers to join a national scheme. The writers therefore need to provide some certainty that a national scheme is both practical and imminent to ensure that enough funds can be generated to sustain a reputable accreditation scheme.
17. **No decision on lay pregnancy testing prior to completion of ASEL:** The writer implies that the current ASEL review may relax the requirements for PREgCHECK™ veterinarians to be used for breeder cattle, but this is highly unlikely given the recent introduction of additional requirements to ensure free martins are not exported as breeder cattle into China. Failure of the accreditation scheme in the live export of sheep in recent months would also suggest that accreditation schemes need to be strengthened and not relaxed to maintain the live export trade worth \$1.35 billion to Australia.
18. **Status of lay pregnancy testing in Queensland:** Conspicuous by its absence in this document, is the failure to mention that pregnancy testing has, and is still currently taught to non-veterinary students at Agricultural Schools in Queensland and to producers at privately run schools. Cattle producers can therefore test their own stock and remain within the confines of the current legislation. Thousands of students have been instructed in the procedure over the decades. No data has been provided on how many females are tested annually by their owners.
19. **Gross income survey data does not provide an accurate assessment:** Survey data is provided on gross incomes being derived from cattle in mixed veterinary practices. It is a little unclear what this data is highlighting but it must be pointed out, that gross income by species is a poor reflection of activity within a practice as the overheads involved with small animal practice such as kennels, clinic rent, veterinary nurses and expensive support equipment all have to be recovered by the practitioner whereas cattle practice is largely ambulatory.

Other Jurisdiction experiences

The Western Australia situation

Section 26(4) (b) of the *WA Veterinary Surgeons Act 1960* allows for the authorization of a person who is not a registered veterinary surgeon to carryout, under the direction of a registered veterinary surgeon, an act of veterinary surgery that is specified by regulation.

The WA Veterinary Surgeons' Board authorizes non-veterinary testers to test cattle for pregnancy by ultrasound or manual palpation under specific conditions set out in the Board's accreditation guideline documents.

The legislation is quite clear about both the scope and the intention of the legislation to deregulate pregnancy diagnosis. The true situation in Western Australia is quite different. Producers now employ lay pregnancy testers in Western Australia without abiding by the required restrictions and there has been little enforcement activity to increase compliance with the requirements of the scheme.

In Western Australia, this scheme has:

- ▣ reduced the number of veterinarians in rural areas
- ▣ reduced opportunities for newly-graduated veterinarians to work in rural areas
- ▣ impaired surveillance for exotic and zoonotic disease
- ▣ reduced access to veterinarians with the necessary skills to support livestock producers
- ▣ diminished welfare outcomes for livestock, and
- ▣ increased issues of food safety by reducing veterinary oversight in the procurement and administration of scheduled and unscheduled medications.

Surveys undertaken in 2011 by veterinarian Zoe Chatfield (nee Bagshaw) found that the bovine caseload of rural veterinary practices in WA had declined from 90 percent to 19 per cent since deregulation in WA. Veterinary practices surveyed stated that businesses could increase their cattle veterinary staffing levels by an additional 80% if pregnancy diagnosis were only able to be undertaken by a veterinarian. Noting that in veterinary clinics there is a ratio of 1 to 1.4 support staff per veterinarian employed, there is a considerable flow on employment effect for local rural communities based on the number of veterinarians employed.

After it was deregulated within WA there were many lay pregnancy testers working in the system. Within a relatively short time there was a great deal of attrition from the system, and there are currently only three registered with the vet board, and one of these is injured and has not undertaken any work for some time. In the South-west region of WA, the lay pregnancy testing provider has structured his business and workload to maximize profitability, and no longer will work at properties with small herds, poor facilities, or work with unsuitable crushes. In the 11 years since deregulation the single lay operator in the south west of WA has had a substantial impact on the availability and level of veterinary services available to cattle producers over a large region. Several practices have reduced the number of veterinarians in this time or have diverted veterinary resources elsewhere in their business. Declining contact with cattle producers has resulted in a loss of established veterinary-client-patient (VCPR) relationships, reduced the level of service available, reduced skill level of veterinarians relevant to cattle producers and substantially increased the cost of veterinary services to livestock producers as the regular, scheduled income stream of pregnancy diagnosis work has been eroded. Now cattle producers have reduced access to veterinary services, or have to engage veterinary services from further afield, at significantly higher cost. It is highly likely that a similar boom and bust cycle will occur in Queensland. This would destroy veterinary sustainability and reduce veterinarians in rural practices, impact on Queensland biosecurity capability and in 5 years' time Queensland producers will not be any better off, and in fact will be worse off.

Our discussions with AgForce have indicated between 10 and 20 Queenslanders may embrace such a scheme if it was offered. It is unreasonable to expect the Queensland tax payer to pay for the cost of setting up a pregnancy testing scheme for such a small number of service providers when the market is already sufficiently served by highly-qualified and regulated veterinarians. If the cost, as indicated by the election platform document, is \$1 million to set up such a scheme, then the minimum cost per tester is at least \$50,000. This compares to veterinarians funding their own training and registration board and leaving university with a personal debt in excess of \$100,000.

Northern Territory

The NT situation is far from an acceptable. ESCAS does not allow misdiagnosed "empty" feeder heifers to exit the Indonesian supply chain as cow-calf pairs any longer. This has resulted in importers fining exporters for non-compliant animals. In one mob of approximately 1360 females audited for pregnancy status at the Darwin export depot, lay testers had incorrectly diagnosed (as not pregnant) 95 pregnancies up to seven months of gestation – a 7% error rate.

AVA has been in direct contact with exporters who have stated with certainty that they do not want the deregulation of pregnancy diagnosis services in Queensland as it has occurred in the Northern Territory. One exporter has asked us to do whatever we can to ensure that “Queensland does not become like the Northern Territory”.

Some exporters are getting lines of heifers retested at the Darwin depot and are consistently finding in the order of 5% of heifers submitted from the lay testers are non-compliant to required pregnancy status. When asked whether this is the case with Queensland vet-tested cattle, they reported that they don't see the same issues. Furthermore, the exporters claim that they have never had a problem sourcing feeder heifers for export from Queensland due to lack of access to a veterinarian.

Pregnancy testing prior to export is a business cost that confers much greater value to northern heifers than other supply chain options. Compromising Queensland's ability to export heifers is a real risk to this value chain.

Other factors for consideration

Dispute options

In the case of a lay technician there is access to civil court proceedings in the event of dissatisfaction with the service delivery, and veterinarians hold indemnity insurance, which has significant yearly cost. For veterinarians producers have two mechanisms for dealing with unsatisfactory results. They can go to the ACV PREGCHECK™ scheme and they will address the issue within the scheme. The producer can also go to the relevant state Veterinary Surgeon's board.

Practice sustainability and vet employment in the region

In March 2018 the ACV undertook a survey of members using survey monkey (n=72). Importantly, for practice sustainability, when asked the question *'do you think there will be a loss in practice income if lay pregnancy testing is allowed'*, 94 per cent of veterinarians said there would be an impact, and 50 per cent of these said a great deal or a lot. This proposed change will impact veterinarians in rural areas in Queensland and decimate the industry, just as occurred in Western Australia, as our case study demonstrates.

To lose the income from pregnancy diagnosis would result in many rural practices becoming financially unviable. Losing these practices will ultimately result in substantially diminished disease surveillance, biosecurity, food safety and animal health and welfare services within the state of Queensland, as well as having a negative social impact on rural communities.

Ultrasound

Ultrasound devices are an excellent tool for the diagnosis of pregnancy, but when reasonable throughput is the goal, their use to assure empty status is absolutely inappropriate. To prove this point, a group of PREGCHECK™ accredited examiners, using the ultrasound in the course of their usual pregnancy testing logged the results from 40 management groups amounting to 4,143 cows.

They kept track of the number of animals misdiagnosed by ultrasonography alone, backed up by the gold standard of manual palpation. The ultrasound's sensitivity for positive pregnancy status varied from 78.5% to 100% with a mean of 95.6%. Translated, this data set showed that up to 21.5% of pregnancies could have been missed, with an average of 4.4% missed pregnancies if the animals diagnosed as empty by ultrasonography had not been manually confirmed.

The specificity for empty status was much worse, varying from 0 to 100% with a mean of 79.3% meaning that on average only 79.3% of the animals where a pregnancy was not visualized were actually empty. Overall, from 4,143 animals tested by rigid ultrasound, 181 pregnancies were missed by the ultrasound.

Biosecurity Queensland Survey

The Biosecurity Queensland survey that has been sent out was very flawed in design, and frankly appears biased or demonstrates incompetence and a lack of understanding. It does not provide scope to demonstrate the nature of rural practices that travel large distances, and undertake thousands of pregnancy diagnoses per week, and ten's, if not hundreds of thousands, per year. The results obtained will be questionable.

Ovarian scanning addition

AVA is puzzled by the inclusion of ovarian scanning in this RIS. Ovarian scanning must also remain in the hands of registered veterinarians. Ovarian scanning is used to ascertain puberty and to diagnose the cause in some cases of infertility. As it is used in the diagnosis of disease, and diagnosis of disease is an act of Veterinary Science, it should be restricted to registered veterinarians. As the process of ovarian scanning is undertaken on prepubertal heifers and it is not a quick process, it can be quite distressing for the animals concerned and detrimental to their welfare in some cases, it should be restricted to registered veterinarians.

Summary

Pregnancy diagnosis needs to remain an act of veterinary science in Queensland for the long-term benefit of the live export industry. In addition to maintaining high levels of accuracy and accountability with results, veterinarians also provide many value-added services while on farm providing pregnancy diagnosis. These include conversations about animal health and production, disease and biosecurity-related matters, and a *de facto* passive disease surveillance system.

If the cattle industry wishes to have access to rural veterinarians for emergency and other routine work, it is necessary to maintain a viable veterinary industry. Removing pregnancy diagnosis as an act of veterinary science and establishing a non-veterinary pregnancy testing process will undermine this. In turn this risks animal health and welfare, surveillance and potentially the access to export markets which Northern Queensland relies on.

Clearly, the most efficient and effective way of achieving pregnancy diagnosis of cattle in Queensland is by veterinarians providing the service to meet market demand as is currently the case. ACV has a publicly-available list of current accredited pregnancy testers who have agreed to have their contacts included. Our office has never received a call from a producer unable to find a veterinarian to test their cows and heifers.

If the Queensland government wants to provide additional resources for Queensland producers then a far better long-term solution would be investing the money in bonding veterinary graduates into rural areas within Queensland. The \$1M proposed by Agforce for this scheme would indenture 20 to 40 students over a 5-year time frame into Queensland rural communities, meeting the needs of the Queensland cattle industry for this generation and the next.

In conclusion, AVA believes this will dramatically impact on the Queensland Cattle Industries long term sustainability, lead to poorer animal health and welfare outcomes, and impact on Queensland ability to maintain its post border biosecurity responsibilities as outlined in the Intergovernmental agreement on biosecurity.

This regulatory impact statement fails to provide a balanced and comprehensive assessment of the real issues being discussed here and it is highly recommended that any decision be put on hold until the ASEL requirement is completed and a more balanced statement can be prepared.

Appendix 1 – Report by Dr Geoff Niethe on pregnancy testing under ASEL

PREGNANCY TESTING UNDER AESL

Background: The instructions with regards pregnancy testing for the export of livestock is unambiguous under the Australian Standards for the Export of Livestock (Version 2.3) 2011. If the specs are for feeder or slaughter cattle, under S1.8 females must be (a) of a liveweight of more than 200 kg and less than 650, (b) must have been pregnancy tested during the 30 day period before export and certified in writing as not detectably pregnant by the registered veterinarian or competent pregnancy tester who pregnancy tested the cattle; or (c) be accompanied by a vendor declaration that certifies that they have been spayed. In the NT and WA, a **competent pregnancy tester**, is a person accredited by the relevant agency to conduct pregnancy tests. If the spec is for pregnant cattle, they must be from condition scores 3 to 6 (inclusive) on a scale of 1 to 7. Females must have (a) an individual liveweight of more than 200 kg and less than 650 kg, (b) have been pregnancy tested within the 30-day period before export and certified in writing as no more than a maximum of 190 days pregnant for cattle. The certification must be provided by a veterinarian who is a member of the Australian Cattle Veterinarians and an accredited tester under the National Cattle Pregnancy Diagnosis Scheme and who pregnancy tested the cattle. If the accredited veterinarian states that the animals are too small to be manually palpated safely; the veterinarian may base this certification on assessment of the animals by a method other than manual palpation. If the stock are transported by air, under S6.6, the maximum days pregnant at the scheduled date of departure is 250 days.

Pregnancy Diagnosis: - The 2 most reliable and practical methods to establish the pregnancy status of an animal is by manual palpation or using ultrasound. B mode or real time ultrasound with the transducer embodied in a specially designed pole/introducer has been developed for cattle and offers increased speed (especially in rotary dairies) and less fatigue/stress on the operator. While a recordable image is theoretically possible, the disadvantages include the initial cost of the machine, the need to confirm not detectably pregnant animals manually and the inability to reliably determine pregnancies in animals greater than 4 months pregnant i.e. where the gravid uterus has dropped over the brim and is deep in the abdominal cavity of the animal. The non-pregnant uterus is sometimes difficult to locate using the sector probe which has been employed in these devices. Manual palpation by an experienced operator who has been trained in foetal aging can effectively determine pregnancy status down to 6 weeks of age in almost all animals (the exception being extremely large and fat breeders where the uterus can't be retracted) and is the gold standard. Manual palpation is the favoured option for identifying "not detectably animals" and those with uterine abnormalities e.g. "freemartins" however the size of the animal being examined limits its use in heifers <250 kgs by many operators except those with very small hands and forearms. There could be potential animal welfare considerations if rectal manipulation in heifers of 200kgs were to be widely condoned. Fortunately, the prevalence of pregnancies in animals of this age is extremely low as the recommended and accepted industry target weights for joining heifers in Australia is 230-280 kgs for Jersey heifers and 330-370 kgs for Holstein-Friesians.

Age (months)	Jerseys Target live weight kg	Holstein-Friesian Target live weight kg
Birth	20–25	35–45
Weaning (2–3)	70–80	90–100
12	170–180	250–280
15 (mating)	230–280	330–370
24 (pre calving)	400–450	550–600

Target live weights (kg) for Holstein-Friesian and Jersey heifers

Courtesy of "Growing Heifers" by Ray Johnston, NSW Agriculture, Gloucester, Dick Buesnel, NSW Agriculture, Bega and John Moran, Agriculture Victoria, Kyabram

A device to determine pregnancy externally at the right flank and paralumbar fossa of an animal is still under development and is not currently available and so has not been considered in this discussion.

The NCPD Scheme: Certification of pregnancy is fundamental for quality assurance in any market specification with regards breeder stock. The Australian Cattle Veterinarian (ACV) National Cattle Pregnancy Diagnosis (NCPD) scheme has been developed over two decades and underpins the export protocols for all breeder cattle in the live export trade. Accredited non-veterinarians can be used for feeder and slaughter cattle from the NT and WA but not for animals intended for breeding. The NCPD has developed into what is arguably the best in the world for certification of pregnancy in cattle and while no scheme can offer absolute guarantees, any issues or complaints relating to certification can and should be handled by the professional body (ACV) that operates the scheme. In summary, the NCPD scheme (see attachment) is underpinned by: -

- A veterinary degree which automatically includes training in anatomy, diseases, physiology and basic manipulation of the reproductive tract of cattle.

- Registration as a veterinarian and membership of the Australian Veterinary Association and Australian Cattle Veterinarians.
- A comprehensive 95-page manual “Pregnancy Diagnosis in Cattle” that covers all aspects of pregnancy diagnosis.
- A log demonstrating that any prospective veterinary graduate has palpated a minimum of 2,000 animals prior to examination.
- Basic rules to follow where uncertainty exists e.g. “Never put an empty tag on an animal unless you have palpated the empty uterus”.
- A test by an accredited examiner on 100 animals with zero tolerance on positive or negative animals and guidelines for the prevalence of pregnancy status in the mob on which the examination is conducted.
- A certified examiner who has at least 5 years’ experience and who has tested >20,000 head.
- Individual identification (normally a colour coded tail tag) of every animal tested that is traceable back to the individual veterinarian who performed the test.
- A phone number on each tail tag that can be used in case of complaints.
- A certification that accompanies each mob tested which lists the ID of all animals in the mob along with any tail tags that have been replaced.
- A traceback system to investigate all complaints.
- A random annual audit system.
- Potential deregistration by the Veterinary Surgeons board for professional misconduct as a veterinarian and automatic loss of accreditation.

It should be noted that a separate accreditation and examination process exists for those veterinarians that are now using ultrasound examination in their pregnancy diagnostic service.

Additional comments: The current standards should ensure there are no issues with pregnancy diagnosis and certification of pregnant breeders in the live export trade. The odd abortion can occur when transporting animals, but this is a risk associated with pregnancy and would normally be expected to <1% unless some unforeseen stressor or agent were involved. Abortions in breeders less than 8 months pregnant are readily recognised on development and size/weight of the foetus and will be recorded as such. The only issue that could possibly arise is with animals being transported by air and where the requirement is for the pregnancy to be <250 days. Foetal aging becomes more problematic once the pregnancy develops past 4 months and a one-month error is generally acknowledged and accepted in animals that are >4 months pregnant. The issue here would be one of birth during transit and provided the calf survives and conditions on the plane are satisfactory, then consumer concern should be minimal.

If the specification is to deliver a pregnant animal and the animal on arrival does not calve within roughly 1 month either side of its expected calving date, then this is a matter for the ACV to follow up through their NCPD scheme and the necessary complaints and actions investigated. The customer from the importing country needs to be aware that the scheme exists and that complaints are taken seriously. The complainant needs to have the contact details of the NCPD convener, the original accompanying certification, a list of animals that were incorrectly diagnosed and evidence (where possible e.g. photo) of the transgression. Now traceback becomes problematic once the animals leave the country and “one off” issues would be difficult to follow up BUT if the problem is sizeable or if the offending operator persistently is making mistakes, then ACV can certainly examine the suspect offender back in Australia as an absolute minimum requirement for traceback.

Under the NCPD scheme, no accredited tester should be certifying animals are empty (not detectably pregnant) unless they can categorically establish (usually by manual palpation) that the animal is non-pregnant. Now if the animal is too small to examine manually and if they are unable to assess the reproductive tract with an ultrasound (linear probe), then the heifers must not be included in the shipment. On the other hand, if the specification for the shipment is for a non-pregnant heifer suitable for breeding and if the animals are too small to manually palpate, then the glass speculum test can be used to at least ensure the animals are not a “freemartin”. An additional safeguard or protocol which should be considered for inclusion in the certification process is a declaration by the owner (especially dairy farmers) that none of the heifers included in the mob are known to be a female cotwin of a twin at birth. It must be remembered that the incidence of free martins is quite low – usually 1% or less.

In addition, the Australian Cattle Veterinarians have recognised that they need to further develop their certificate of pregnancy to be suitable for large shipments in the live export trade and to include the individual NLIS of each animal tested.

An awareness program may also be required when importing young/small Holstein heifers. The importer needs to recognise that the majority of Holstein heifers will not reach maturity until they have reached a weight of around 300 kgs so it could take 6-12 months depending on nutrition for imported weaner heifers to start cycling after they have arrived in the importing country.

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Appendix 2

LAY PREGNANCY SCHEMES IN AUSTRALIA AND NZ - UPDATE PAPER

20th April 2015

In the initial paper titled “LAY PREGNANCY SCHEMES IN AUSTRALIA AND NZ”, compiled in October 2014, information was provided on how each of the lay pregnancy testing schemes in WA, NT and NZ operate, e.g. training, accreditation, reporting, auditing, and uptake. This update paper provides additional information as to the success or otherwise of the schemes supported by data where data was available, and addresses a number of questions raised by Agforce.

All of the information provided in this report has been supplied in complete confidence. In some instances people interviewed have been prepared to be named but in doing so, the confidentiality becomes diluted and so it was felt that provision of the contact details will provide an effective avenue to follow up any of the information provided in this report if respondents wish to identify themselves.

The following people associated with the live export trade were contacted in preparing this update paper:

Organisation	Person	Contact Details
Vet Surgeons board , Qld	Registrar	07 32393600
Vet Surgeons Board, WA	Registrar	08 93172353
Australian Cattle Veterinarians	Anna Gates (Convenor of the NCPD scheme)	0417 636839
Australian Cattle Veterinarians	Enoch Bergman (President)	0427 716907
South East Asia Live Export Sales	Kevin Mulvahil (Managing Director)	08 89415710
NTLEA	Tony Eggington	08 89996186
Dept of Agriculture (Darwin)	Johnathon Benyei (Senior Veterinarian)	08 89207001
Dept of Agriculture (Darwin)	Michelle Byers (Senior Field Veterinarian)	08 89984908
Austrex	Warrick Barrett (General Manager)	0428 186064
Elders International	Patrick Underwood	0407 262 260
Wellard Rural Export	Mr Bernie Brosnan (Managing Director)	0419 866268
Frontier International Agri	Mr Ashley James (Operations Manager)	0427 411 406
Australian Accredited Veterinarian	Hamish Brett	0405 101577
DPIF (NT Department)	Susanne Fitzpatrick - Senior veterinarian (responsible for the Lay Pregnancy scheme in the NT)	0407 498003
DPIF (NT Department)	Malcolm Anderson (Chief Veterinary Officer)	malcolm.anderson@nt.gov.au
Ministry for Primary Industry New Zealand	Roger Poland DVM MANZCVS Senior Adviser (Animal Welfare)	Telephone: 64-4-894 0372 Facsimile: 64-4-894 0733

Update of Veterinary Surgeons Act

The Veterinary Surgeons Acts in both Queensland and Western Australia are still in the process of being reviewed. No one was prepared to put a date on when these reviews will be completed and when changes might be introduced into parliament. There are no proposed changes to the act in WA with regards a ‘prescribed person’ who is able to perform acts of veterinary science under a registered veterinarian. In Queensland, with the recent change in government, no indication was provided as to what changes may occur and when this is likely to happen.

Prevalence of false negatives by lay pregnancy testers

While there are sound arguments for the use of lay pregnancy testers by properties in the NT with regards convenience, cost and ensuring the live export trade flows smoothly, no one that was interviewed supported its reliability in the current format. Despite the fact that no lay pregnancy testers had lost their accreditation, breaches are occurring and there is mounting pressure from the Indonesian importers to ensure pregnant animals don’t end up in their consignments. Several exporters stated that the ratio of steers to heifers being exported has increased from 66.6% steers : 33.3% heifers to 80% steers : 20% heifers in recent times due to growing numbers of unwanted pregnancies in the consignments. Indonesian feedlotter (Santori, TUM and WST) have all expressed serious concerns about the level of pregnant animals arriving at their feedlots. One exporter is arranging for an Australian Cattle Veterinarian to travel to

Santori to investigate further and to try and get a better handle on the actual extent of their losses. While pregnant animals that calve during transit pose serious welfare issues, the main reasons why pregnant heifers are not wanted in feedlots are:

1. When heifers are being purchased on a live weight basis, then the importers are paying for live weight that cannot be recuperated. At around \$2.00/kg live this can add an extra \$5.00 to \$40.00/beast.
2. The feed conversion ratio of pregnant animals is less than their non pregnant counterparts as extra feed is being diverted to the growing foetus.
3. The Indonesian butchers have become very anxious about slaughtering pregnant animals both on religious grounds and reduced dressing percentage.
4. Animals that are 'springing' or looking 'calfy' at slaughter have to be retained at the feedlot until they calve out and this represents an additional economic cost on those animals.

Because of the growing concern of importers at least one live exporter is now doing their own quality assurance at the export depots in Darwin. There is not a lot of data available but a recent test in late March 2015 detected 95 misdiagnosed animals in a consignment of 1,360 head, i.e. 7% errors. The test was performed by an accredited veterinarian in the National Cattle Pregnancy Diagnosis (NCPD) scheme. Approximately 50% of the pregnancies were 2-3 months, 30% were 4-5 months and 20% were 6-7 months pregnant. There were multiple testers used in this consignment and up to 6 lay pregnancy testers are expected to receive warning letters from the Chief Veterinary Officer as soon as the details and the accompanying paperwork is forwarded to the Department from the exporter. Another set of data from late 2014 found 150 pregnant animals in a mob of 700 head (14% error rate). One live exporter confidentially advised that he thought the pregnancy rate was running at around 4%. This is further supported by feedback from at least one Indonesian feedlot which is pregnancy testing heifers on arrival.

Failure of the feedback system in the NT

The issue in the NT is quite sensitive and live exporters have been reluctant to report errors to the Department of Primary Industry and Fisheries (DPIF) for fear of losing customers in what is a very competitive environment. Pregnant animals either have to be returned to the property of origin or slaughtered at a much reduced price at the abattoir. Export yards invariably get left with unwanted animals that have to be fed. It has also been stated that the corporates are equally at fault but because they can exert significant pressure with regards weight of numbers, no one to date has been prepared to instigate regulatory action by supplying details to the DPI&F. Apparently the rate was so bad by one corporate producer that the procedure developed was to ensure a roadtrain was kept back until after the pregnancy test was performed by an accredited veterinarian at the export yard. The station roadtrain would then take the pregnant animals back to the station. However, the practice of pregnancy testing everything at the export yards is not the favoured option as it is not only time consuming and expensive, but also adds another level of stress on the animals in short haul consignments. On the other hand, an exporter who sources over 50% of their cattle out of Queensland stated that he has no issues at all with the Queensland cattle as they are all tested by NCPD veterinarians. Both the reliability of the test and the accompanying paperwork has never been a problem.

It would appear that there are several major issues with the current NT scheme. At an operational level, animals can be tested up to 30 days prior to being exported. This means that animals which are <8 weeks at the time of the test (NB, the NT scheme is based on the earliest diagnosis of pregnancy at 8 weeks) can be up to 12 week pregnant by the time they are loaded. In addition, the NLIS tag is used to identify these animals but unless staff and personnel involved in the preparation of these animals have a list of all the animals tested along with access to an NLIS tag reader, then visual identity of tested animals can be problematic where tested animals are retained in holding paddocks at the property of origin for up to 30 days.

Most of the other issues with the current scheme seem to relate to the examination process, getting adequate experience prior to undertaking the test and ability to maintain quality outcomes:

1. A test immediately following a school is not recommended except for students who have had prior adequate practical experience. Documentation of having tested several thousand head prior to sitting the examination is highly advocated.
2. The rigour of the test required for accreditation is totally inadequate, i.e. able to detect as pregnant cows which are 8 or more weeks pregnant with an accuracy of 100% in 20 cows and attained a pass mark of 80% in the theory examination. A test similar to the NCPD scheme could be considered, i.e. at least 100 head with a wide range of pregnancies.
3. Attendance at a 'one off' school unaccompanied by ongoing supervision and feedback results in a situation where the operator never finds out when they are making the same mistakes.
4. Accredited examiners need to conduct the scheme.
5. Quality assurance cannot be maintained if a feedback system is not adequately resourced and regulated. An initial application charge together with an ongoing annual registration fee would provide funds for investigations, random audits and general administration of the scheme. It would also ensure that only the genuine operators would be engaged. An annual fee of say \$500 amounts to 10 cents per head for an operator

who would test 5,000 head a year. This cost is much less than the costs and problems borne by the purchaser of unwanted pregnant animals.

Pregnancy testing is really about operator honesty and self-assurance. An immediate action that could be adopted by lay preg testers in the NT if nothing else happens in the short term is to promote awareness of the issues and a slogan **“if in doubt, leave her out”**, i.e. only send animals where the empty uterus has been palpated.

The NCPD scheme

The cattle veterinarians have had only one veterinarian reported in recent times for misdiagnosis and possible loss of accreditation. This problem was investigated and subsequently it was found that the failure of the cows to calve (as was initially diagnosed pregnant) was in fact due to an outbreak of Pesti virus in the tested positive animals. The disease was confirmed by laboratory diagnosis of the affected animals.

NCPD veterinarians have to report annually as to the numbers they test and many veterinarians lose their accreditation or don't renew it if they aren't actively participating in the scheme. All NCPD veterinarians have to be registered veterinarians, a member of the Australian Veterinary Association and a member of the Australian Cattle veterinarians. It costs most NCPD veterinarians around \$1,000 p.a. to maintain their accreditation and this does not include the ongoing cost of Continuing Professional Development.

NZ export testing

The export of livestock (sheep, cattle, deer, and goats) for slaughter is prohibited unless the risks to New Zealand's trade reputation can be adequately managed. Individual consignments may be approved on a case-by-case basis at the discretion of the Director-General of Minister for Primary Industries (MPI). Approval may only be granted if the Director-General judges that the risks can be adequately managed. The factors considered can include:

- the export is for slaughter of livestock in commercial slaughter houses
- the importing country has requirements in place that meet the World Organisation for Animal Health 'Guidelines for the Slaughter of Animals'
- cattle exported for slaughter are stunned prior to slaughter in accordance with any of the methods described in the Guidelines
- the importing country has requirements in place that meet the World Organisation for Animal Health 'Guidelines for the Transport of Animals by Land, Sea and Air', in relation to the unloading and post-journey handling and transport of livestock
- a pre-shipment audit of slaughter facilities by inspectors nominated by MPI, carried out at the exporters' expense, demonstrates compliance with the above requirements
- any other matter the Director-General of MPI considers necessary to manage the risks to New Zealand's reputation as a responsible exporter of agricultural products.

Exporters are also required to provide a declaration as to the purpose of export for all livestock exports. Consequently, while export of cattle for slaughter is feasibly possible, the live export trade in cattle revolves around dairy heifers to various countries as listed in the original paper.

If the requirement is for pregnant animals, then certain requirements must be met. Cows should be shipped as early in pregnancy as possible. It is highly unlikely that heifers more than six months pregnant at the date of shipment would be granted an Animal Welfare Export Certificate.

The Recognised Person* will assess pregnant cattle's eligibility for export by:

- a) the use of owner declarations stating the first date of mating and/or
- b) the results of a pregnancy test, supplied by a veterinarian or appropriately qualified paraprofessional** on practice letterhead, stating the date and method of testing, and the stage of pregnancy for each animal at the time of testing.

* The Recognised Person is “A person recognised under section 103 of the Animal Products Act 1999 for the purpose of performing specified functions and/or activities. In the context of this standard, refers to an AsureQuality veterinarian managing the consignment during pre-export preparation”

** An appropriately qualified paraprofessional is “A person who has completed a bachelor degree in Veterinary Technology.” They usually work under the guidance of a registered veterinarian. Qualified veterinary nurses and technicians carrying out the veterinary functions/technical tasks their training equips them for. Bachelor of Veterinary Technology graduates, for example, have veterinary nursing skills and are also trained for an expanded role in clinical examination, history taking, implementing treatment/preventative plans, emergency response, and advanced pain management.

Contact details

This submission is a joint submission by the Qld Division and the Australian Cattle Veterinarians.

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