

RESPONSE FROM THE AUSTRALIAN VETERINARY ASSOCIATION

In respect to the document titled:

Stage 1: Formatting improvements and work plan priorities. Review of the Australian Standards for the Export of Livestock. Technical Advisory Committee consultation report and work plan.

1.1 2012/13 ASEL review

Dr Ray Batey represented the AVA on the 2012 ASEL review steering committee and was a co-author of the December 2012 majority report: *Review of the Inspection Regime Prior to Export of Livestock from Fremantle Port*

http://www.agriculture.gov.au/SiteCollectionDocuments/animal-plant-health/welfare/fremantle-review/Review_of_the_inspection_regime_prior_to_export_of_livestock_from_Fremantle_Port_report.pdf

In this report, 5 of 7 findings and recommendations were directed specifically to the ASEL requirements.

It is recorded that the ALEC representative dissented from the report.

The steering committee addressed a range of matters which affected 'fitness to load' particularly the processes utilised by exporters and AAV's. In hindsight, a significant omission may have been a consideration of the ability of animals to withstand adverse conditions during the voyage, although a range of other fitness criteria were dealt with comprehensively.

It is particularly noteworthy that committee members identified a deficiency in that livestock exporters and others who met with the committee cited 'experience' as sufficient justification for established practices and procedures, but, even given prompting and opportunity, failed to identify 'competence' as a significant attribute.

The above report does not appear to be referenced during the current review. AVA submits that its recommendations should inform the review because it related specifically to the port of Fremantle from which the most recent voyages with major adverse events originated.

1.4 Independent Literature Review

1.5 Research

The AVA requests information on the process of selection of the individual or group who will be commissioned to conduct the independent literature review. It is essential that the individuals conducting the review are suitably qualified in animal physiology, animal health, and animal welfare science, to be able to interpret the literature from both a health and welfare perspective. It is also essential that the literature review be done as a critical review, in which it is expected that justification is given for inclusion or exclusion of research papers, and the quality of evidence in each is assessed as well as any flaws in methodology or conclusions. Preference should be given for peer-reviewed papers published in respected journals, and evidence of lower quality (such as non-peer-reviewed literature, industry reports and anecdote) should be identified as such.

1.6 Proposed work plan

AVA requests plenty of notice of proposed meetings please so we can plan ahead to attend.

1.6.1 Minor amendments and “quick wins”

Removal of requirements for deer and camelids, requiring provision of consignment specific management plans to address specialised animal health and welfare requirements

We support removal of deer-specific information for sea/air export

We also support removal of South American Camelids because they are likely to be sent by air rather than sea.

However we recommend retaining camels export in ASEL because they are likely to be sent by sea and are large animals.

Update, refine and review definitions

Support

Update body condition scores to be consistent with producer values

Support

On-board veterinary medicines and equipment

Current veterinary equipment allowances are completely inadequate. There should be replication of head bale, halter, nose grips, knives/steel/stone, captive bolt/cartridges on every deck.

Pregnancy tests requirements and limits

Cattle – AVA supports a requirement for all NCPD-accredited (PregCheck®). No lay pregnancy testing. Within 30 days of shipping.

Sheep/goats – electronic identification and trace-back if lambs are born on board – we recommend looking at the ramifications of introduction of such a system. Farm trace-back when lambs are born would allow to determine whether incompetent pregnancy testing/fault of buying agent/exporter.

Camels – vet-only

Camelids - < 50 mm max skull diameter if South American Camelids stay in ASEL

Deer to be removed from ASEL

Minimum live-weights for export

Sheep minimum is currently 28 kg but we propose that ≥ 35 kg is more appropriate, based on mortality reports. Suggest reviewing mortality reports in relation to age of sheep, eg Voyage 51 mortality report.

Cattle > 200 kg; < 500 kg

Buffalo > 200 kg

Camels > 150 kg: too immature and flighty if lighter

Secondary inspection of goats prior to export

AAV feedlot inspection.

Farmer Review Recommendation 4 – final inspection for all animals by AAV prior to loading

Compliance with Australian food safety standards

No comment

Horn requirements for cattle, goats and buffalo

Regardless of length, injuries/death by misadventure are possible

Sourcing of southern *Bos taurus* cattle

What proposed minor amendment is ASEL TAC intending?

Same as for sheep, *Bos taurus* cattle south of 26th parallel not to be shipped May-October.

Sourcing of sheep through Darwin, Weipa or Wyndham

What proposed minor amendment is ASEL TAC intending?

Recommend it should be nil regardless of month

Water engorgement requirements

What proposed minor amendment is ASEL TAC intending?

Proposed duplication areas with the Land Transport Standards

Fit to Load should have equivalence with Fit to Export

Additional chaff requirements

All stock require daily chaff.

Extension of long-haul voyage requirements

What proposed minor amendment is ASEL TAC intending?

Addition of Broome to the list of ports in the reformatted ASEL paragraph 1A.3.4 (d)(v)

Support

1.6.2 Stage 2 issues for consideration

1.6.3 Stage 3 issues for consideration

The AVA supports the lists of specific issues identified for review, and also the prioritising of issues relating to animals exported through the northern hemisphere summer.

We wish to add to the list provided, the following highly important issues that do not specifically appear in either the Stage 2 or Stage 3 lists of issues for consideration:

- Reducing the threshold at which mortalities are reported / investigated
- Flooring characteristics (ie the actual physical characteristics of the flooring). Perhaps this can be added to the issue dealing with bedding and considered concurrently.
- Pen configuration – as this relates to animal comfort, sufficient trough length and ability of animals to access feed and water, ability for stockmen/vets to easily inspect individual sheep, and ability of stockmen to access sick stock and remove dead stock.

Additional preliminary comments in respect to the document titled:

***Australian Standards for the Export of Livestock Part 1: Reformatted
Stage: Consultation Draft Consultation period 6 February—20 March 2018***

Definition

Competent stock handler

AVA suggests that ‘relevant experience’ is an inadequate sole criterion to demonstrate competence in this industry, particularly considering the findings of the *Review of the Inspection Regime Prior to Export of Livestock from Fremantle Port*. It is suggested that this be amended to ‘recognition of prior learning’ in line with Vocational and Employment Training processes and/or it be qualified by the other criteria. It is of concern that poor practices are frequently perpetuated and/or justified in livestock industries on the basis of the operator being ‘experienced’- one notable example being poor Mulesing technique.

1A.3.1.f Animals intended to be exported for human consumption must comply with Australian food safety requirements, including standards for chemical residues or environmental contaminants.

Should this be linked to record and NVD obligations? It is noted this does not refer to ESI requirements but it is a consideration that some markets may have concerns about possible residues from some treatments (such as injectable long-acting oxytetracycline).

1A.3.1.xxi ballanitis (pizzle rot)

This should be ‘balanitis’ or preferably ‘balano-posthitis’

Overarching requirements

4A. Responsibility for the health and welfare of animals

4A.1 Ensuring all animals are fit to export

The issue of competence became a critical issue during the *Review of the Inspection Regime Prior to Export of Livestock from Fremantle Port*.

Sections 4.A and 4.A.1 would appear to imply that exporters and corporate bodies are required to have relevant systems in place to ensure animal welfare outcomes. However, a significant omission may be performance indicators which might include evidence of appropriate corrective actions or modifications of systems following adverse events.