

17 May 2019

Technical Advisory Committee Secretariat  
GPO Box 858  
Canberra ACT 2601

By email: [tacsecretariat@agriculture.gov.au](mailto:tacsecretariat@agriculture.gov.au)

Dear Secretariat,

The Australian Livestock Exporters' Council (ALEC) is a member-based, peak industry body representing Australia's livestock export sector. It sets industry policy, provides strategic direction to the industry and represents Australia's livestock export trade in Australia and internationally.

ALEC members account for more than 96 per cent of Australia's annual livestock exports, by volume and value. ALEC's membership also extends to supply chain participants including registered premise operators, ship owners, feed suppliers and other service providers to the trade.

Air transport occupies a small, but important, place in the shipment of Australian livestock to export markets. As such, ALEC welcomes this opportunity provided by the Australian Standards for Export of Livestock (ASEL) Technical Advisory Committee (TAC) to respond to its *Issues Paper - Review of the Australian Standards for the Export of Livestock: Air Transport* (the Issues Paper).

The Australian Livestock Export Corporation Limited (LiveCorp) is a not-for-profit industry body funded through statutory levies collected on the live export (including by air) of sheep, goats and beef cattle, and a voluntary levy collected on live dairy cattle exports. ALEC strongly supports the LiveCorp submission to the Issues Paper, prepared with assistance from the LiveAir consultative committee. This submission incorporates the research knowledge of LiveCorp, with the extensive practical and operational knowledge of the LiveAir consultative committee.

*High welfare outcomes achieved - irrespective of mode of transport*

High welfare outcomes are achieved for Australian livestock irrespective of mode of transport, with air transport delivering excellent welfare outcomes. This cautions against placing undue regulatory burden on air transport of livestock, as air transport already provides an effective method for safely transporting livestock to export markets.

*Aligning with international standards where possible*

ALEC recommends aligning Australian standards with the World Organisation for Animal Health (OIE) standards where possible. Not aligning Australian standards with accepted international standards (to which Australia is a signatory) may result in potential violation of World Trade Organisation rules. More importantly, not to do so would place Australia out of step with well accepted international rules. It is understood that Australia accepts these rules for animal imports – except in exceptional circumstances, the same should apply for animal exports.

*Weight & age*

The Land Transport Standards, the International Air Transport Association (IATA) and OIE standards do not impose prohibitions on the transport of cattle, sheep and goats by air based on weight or age. Reference to other standards and the experience of live air exporters indicates a case for increasing minimum weights for sheep is unnecessary. ALEC contends that blanket prohibitions on transporting animals with certain characteristics should only be imposed when it is concluded that available risk mitigation procedures will not prevent poor welfare outcomes.

*Space allocations*

The current ASEL standards for air transport, as well as being reasonably aligned with international standards, also align closely with the Australian land transport guidelines. ALEC does not support any change to space allocations that substantially deviate from current international standards. Therefore, a change to the use of allometry for air transport, as adopted in the sea transport review of ASEL, is not supported. If space allocations that differ to those currently accepted internationally are sought by the Australian Government, then ALEC recommends arguments for change to the standards be presented at the appropriate international forums.

The current ASEL standards require an additional 10% of space be allocated to animals when loaded into the lower hold of aircraft. ALEC is not aware of any justification for this requirement and research undertaken by LiveCorp indicates that, on modern aircraft, ventilation in the lower hold is superior to the main hold. Without clear evidence as to its need, this requirement should be removed.

*Rounding*

Both the OIE and IATA standards allow for rounding up to appropriately fit animals in an air freight crate. The OIE standards point to the danger of increased injuries if animals are loaded too loosely within a crate. Current stocking densities, including the practice of rounding, has not resulted in inferior welfare outcomes for air transport. Low morbidity and mortality levels experienced for air shipments indicate that welfare has not been compromised. On the other hand, preventing rounding would substantially affect the economics of air travel. As such, ALEC supports the retention of rounding up.

*Approved Premise*

Currently, preparation of livestock exported by air can occur at an Approved Premise rather than at a Registered Premise, as is the case for sea transport. A requirement to only use a Registered Premise when livestock are exported by air would result in substantially increased economic and logistical costs and would, almost certainly, result in a deterioration of animal welfare outcomes.

Managing feed and, especially, water deprivation times is an issue of which air exporters are extremely aware. These exporters have a demonstrated history of working closely with importers to ensure livestock are not put at risk of an adverse outcome. The current standards are working well and as such, no reason exists to add to regulatory burden with additional layers of ASEL requirements.

*Attendants on live export aircraft*

As emphasised by ALEC in our Stage 1 ASEL submission, checking livestock as specified in Section 6.22 of ASEL V2.3 is not standard operating practice, generally not possible given the constraints of aircraft operations, and not best animal welfare practice. Only limited access to animal consignments during flight is possible. Even on the main hold of a freighter aircraft access should be used sparingly for a variety of reasons. Moreover, no access is available for the lower hold or on passenger flights.

Industry is cognisant that when transporting by air, the greatest potential risk to animal welfare is during loading, unloading, at transit stops or if an aircraft is diverted. A competent person accompanying the consignment could ensure that handling and other aspects of loading and unloading are completed appropriately and in ways that protect animal welfare (small as these risks might be). Similarly, during transit stops or if an aircraft is diverted, a competent person accompanying the consignment can ensure appropriate provisions are made for the animals.

Even with no access to the animals, the accompanying person can monitor gauges and influence decisions being made during flight. This would be expected to have more impact in mitigating welfare risk than any change to the standards involving preparation of livestock, penning arrangements and crate design, fodder and water requirements and Government inspection. This requirement would, however, be costly (\$2,000 – 4,000 per consignment) and extremely complex to implement. Such a requirement would therefore need to be carefully considered and, noting livestock transport by air already maintains an excellent animal welfare record, only introduced where a benefit can be demonstrated.

In the first instance, industry would support a requirement for industry appointed approved attendants for freighter-based exports. This is noting that an attendant on these kinds of flights will have a greater opportunity to contribute to animal welfare improvements and the scale of the shipment supports such a measure. The effectiveness of the measure could then be monitored for these shipments and a decision then made on whether to extend the provision to other shipments.



In addition, industry would support an exporter appointed approved attendant or exporter proposed shipment management plan for all passenger aircraft consignments, with a recommendation of appointed agent being responsible for the transit check/care of the consignment on route if transits/tranships occur. ALEC notes that LiveAir is engaging with passenger airline companies to enable greater communication and access to livestock on tarmac, on route and on landing for “a possible” attendant on board. Industry’s position will be reviewed following initial implementation and an associated animal welfare improvement can be established.

Finally, it is vitally important to understand that even minor changes to regulations can have major cost ramifications. As such, any change needs to clearly demonstrate animal welfare improvements, which may be difficult noting the history of excellent animal welfare air transport has achieved.

ALEC and its members expect that this submission will assist the TAC in its consideration of existing ASEL regulations for air transport. Please do not hesitate to contact me if you require further information.

Regards,

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