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Australian Standards and Guidelines for the Welfare of Animals

Dear Kevin,

The following are the deliberations of LiveCorp and ALEC on the Land transport Standards and Guidelines.

Context

As a major stakeholder in these Standards and having gone through a construction and revision of the Australian Standards for the Export of Livestock (ASEL) in the last 4 years, we had to ensure that we had a context within which we could review these Standards and Guidelines. That context is as follows

- The Standards are relevant
- The Standards can be enforced
- The Guidelines represent best industry practice
- Both Standards and Guidelines are commercially viable
- And last but not most important
There is no anomaly between these Standards and Guidelines and the Australian Standards for the Export of Livestock

General Comments

- The concept of these conversions from Model Codes of Practice and the State regulatory regime is supported in principle by the industry provided they are no more or less stringent than the ASEL
- This support is also conditional on the two legislative areas namely State and Federal governments having distinct jurisdictions and there is no overlap of regulators.
- The Standards as reviewed are relevant and commercially viable and for the most part meet the requirements of the Live Export industry.

- The major difference in splitting the Guidelines out of the Standards is sensible and is supported by the industry for the conversion of the Model Codes of Practice, however careful consideration will need to be given before this format can be applied across ASEL as there may well be problems in maintaining a high standard with a reduced compliance base.

Specific Comments

One of the main contextual requirements as mentioned earlier is the compatibility of these Standard and Guidelines to ASEL. As a result, the table below picks areas where some differences exist. The remedial action for these differences may be a for our industry to alter ASEL or possible advice to you. Where possible I have stated any recommended action

Topic	New Standards and Guidelines	ASEL	Recommended Action
Compliance		S2.1 This refers to the need for the land transport for Live Export to meet all State and Territory legislation and Codes of practice.	ASEL will need to be clarified
Responsibilities	This standard lists as Guidelines the responsibilities of consignors, drivers, transport companies, receivers, planners and railway operatives. It is highly detailed far in excess of ASEL. The problem lies in that ASEL assigns ultimate responsibility to the exporter.	ASEL holds the Exporter ultimately responsible	Industry believes that the exporter cannot be held responsible for processes beyond his control and this may apply to a consignment of animals purchased “delivered to feedlot”. This will need to be clarified in ASEL
Planning	No time stipulation other than a requirement for additional documentation for trips over 24 hours. Guideline GA1.3 details planning requirements by the driver. Contingency arrangements very detailed in the guidelines	S2.3 Transport Plan- ASEL only invokes a transport plan for journeys over 8 hours or interstate journeys over 2 hours	ASEL is more stringent here and should remain so. Possibly this could be re-looked at in the Standards and Guidelines

Humane Destruction	Part of the drivers responsibility and detailed throughout the Standards and guidelines		This could be repeated in ASEL
	A separate section mandates extensive requirements for humane destruction. Also each animals species has detailed methods		
Competency	Standards call for a competent person for selection, loading, transporting and unloading	ASEL calls for competency in unloading only	ASEL should be reviewed here
Vehicles	Similar to ASEL	ASEL has additional requirements of registration and deck spacing	Minor Point
Selection	Similar rejection criteria except stipulate not to be blind in both eyes	ASEL has blind in one eye as a rejection criteria.	This will need to be altered in ASEL
Loading	The Standards contain significant additional Animal Welfare requirements to ASEL especially in the physical handling of an animal eg. No throwing kicking hitting etc. This is in the mandated section ie Standards		I am not sure this needs to be in the Standards but rather in the Guidelines
	Guidelines include Driver Management. This has been suggested to be added to ASEL at the last LESAC committee meeting		This is being reviewed for ASEL

Species Requirements

Buffalo	Standards mandate maximum water deprivation times- 36 hours for adult, 24 for pregnant or less than 6 months old.	ASEL does not stipulate a maximum time off water but suggests the cattle figures as a guide. ASEL raises the issue of heat stress	Need to discuss with ASEL if this is adequate. Also recommend that the Standards and Guidelines look at differences with buffalo
Cattle	Deals in much wider range of weights ie. 100 kg but maximum time off water and loading densities are the same as ASEL		No action required as live export deals with a minimum weight for cattle of 200Kg

Goats	Maximum time off water is quite different to ASEL Goats >6 months 48 hours	Maximum time off water is 32 hours extended to 38 under defined circumstances for goats over 12 months old	These must be reconciled as the Standards are too far apart
	Spelling times in the Standards are 36 hours after 48 hours of deprivation	Spelling times in ASEL are 12 hours after 32 hours	
	Loading densities are slightly different with lower weights requiring less room and heavier requiring more room		
Sheep	Standards require 36 hours maximum time off water extendable to 48 hours. Guidelines are quite detailed in the justifications to extend maximum time off water	ASEL require shorter time off water at 32 extendable to 38 hours	ASEL may need to be reviewed as these differences are more stringent
	Mustering and loading times are in the Guidelines NOT the Standards	The same values for mustering and loading times are mandated in ASEL	

The RIS seemed a very thorough document and no comment is offered

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