



# CATTLE COUNCIL OF AUSTRALIA

29 November 2019

Ms Melissa McEwen  
Principal Regulator and First Assistant Secretary  
Live Animal Exports Division  
Department of Agriculture  
GPO Box 858  
CANBERRA CITY ACT 2601

Via email: [livestockexp@agriculture.gov.au](mailto:livestockexp@agriculture.gov.au)

Dear Ms McEwen

**RE: Implementing Australian Standards for the Export of Livestock review recommendations**

The Cattle Council of Australia (Cattle Council) appreciates the opportunity to provide input into the implementation of the 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 1,095,325 head of Australian cattle annually exported (to over 23 countries), at a value of A\$1.2 billion (export value), it is vital that Australia has an efficient and clear set of standards that enable ASEL to be easily understood and utilised by those in the livestock export industry.

As a member of the Northern Australian Live Export Working Group (NALEWG), Cattle Council endorses the submission to the review provided by the NALEWG. There are however, a number of points that the Cattle Council would like to reinforce, that have been articulated in previous submissions to the ASEL Review.

Cattle Council supports Recommendation 7:

*“That the standards require that cattle and buffalo over 500kg may only be exported in accordance with a heavy cattle/buffalo management plan to be agreed with the department. The welfare of cattle and buffalo over 500kg should also be monitored over the coming 12 months to assess whether an absolute upper weight limit is needed in the standard.”*

Increased mortality risks and poor animal welfare outcomes associated with transporting heavy buffalo by sea are of concern to Cattle Council. We assert that feral buffalo over six years of age or over 500kg should not be exported as these animals pose the highest mortality and human health and safety risks.

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Cattle Council supports weighing individual animals, as group weighing could potentially allow too many out of specification animals (too heavy or too light) in a consignment. It would be reasonable to allow for a tolerance factor either side of a weight specification, although as live buffalo exports present a specific risk profile, Cattle Council considers that every individual buffalo must meet a weight specification prior to export.

As buffalo have a different metabolism to cattle, they are more prone to suffer heat stress during a voyage at sea than cattle. Cattle Council contends that they should be allocated the coolest and best ventilated area of the ship to mitigate against poor animal welfare outcomes.

Cattle Council considers that all feral or free-range buffalo should spend at least 14 days in an approved registered premises (RP) before export, and that each individual buffalo should be inspected in the RP prior to loading. To ensure optimal animal welfare outcomes on the voyage, it is in the exporters best interest to be the party responsible for reporting mortality incidences.

Cattle Council have asserted in previous submissions to the ASEL review that a 30-day limit for valid pregnancy testing apply. Therefore, Cattle Council supports Recommendation 16 that states:

*“That the standards allow the department to extend the validity of a pregnancy test beyond 30 days only where necessitated by circumstances outside the exporter’s control and where the exporter can demonstrate that the extension will not impact on animal welfare outcomes. That decision should be delegated to regional veterinarians, rather than requiring a formal dispensation from the Canberra office.”*

Cattle Council upholds that the rate should be maintained at 30 days with a tolerance factor for exporters and RPs that experience delays. Cattle Council considers extending the validity of a pregnancy test beyond 30 days as the norm, could call into question the accuracy of the testing, as well as encouraging poor practice and potentially poor animal welfare outcomes.

Cattle Council supports Recommendation 19, which states:

*“That the standards require that a mortality report be provided for each consignment at the time it leaves the registered premises.”*

Cattle Council considers that it is in producers’ best interest to have as much information as possible, including mortality information from the RP, to assist in identifying possible supply or voyage issues.

On behalf of our 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 on 02 6269 5660.

Yours sincerely



Travis Tobin  
Chief Executive Officer