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Australian Standards for the Export of Livestock (ASEL) 2023 update
Department of Agriculture, Fisheries and Forestry
ASELreview@aff.gov.au

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LiveAir Incorporated is an organisation committed to fairly representing stakeholders such as Livestock Exporters, crate manufacturers, transporters, export depots and specialist freight forwarders involved in the live export of livestock by air freight globally ex Australia.

LiveAir appreciates the opportunity to consult with the Dept on the Air freight updates towards ASEL 3.3. and has the following feedback for each Airfreight Update:

- **Competent Stock Handler on aircraft:**
Suggested change to 6.1.27. 'During the air export journey' is not a concise nor feasible instruction and LiveAir would suggest changing to " During the air export journey (only when aircraft is grounded and livestock are accessible)".
Agree to additional proposed changes that appear to remove redundant requirements that are not feasible to achieve in air.
Also, need to be explicit on intent to require data loggers. Concept of data loggers needs to consider airline approval of equipment with battery/ electrical components onboard. Significant concerns around attaching and reclaiming data loggers from disposable crates.
- **Pregnancy Testing and penning requirements for the export of juvenile alpacas**
Agree – The proposed changes are a practical solution for alpacas yet to reach sexual maturity and will have no negative impact on animal welfare requirements.
- **The requirement for contingency plans for escaped livestock:**
Agree- Explicitly incorporates guidance in an EAN (EAN 2012-07) into ASEL, which is preferable to EANs being defacto regulatory instruments. Should only capture current practice, as included in existing Operations and Governance Manuals.
- **Rejection Criteria Table:**
Disagree- "Horns that would endanger the animal or other animals" is too vague. Needs to be more specific and objective or removed.

LiveAir would like to request that proposed changes for Air in ASEL 3.3 is considered a minor amendment and treated as such by the Department during the implementation of this update.

Yours sincerely

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