AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES FOR THE LAND TRANSPORT OF LIVESTOCK

Public Consultation Response Action Plan
September 2008
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INTRODUCTION

This document functioned as an internal draft Reference Group discussion paper and will now be published as a final record of decisions made at and around Reference Group meetings seven and eight. Tracking changes to standards and guidelines have been preserved to illustrate changes proposed or accepted. Final reports will comprise this revised Response Action Plan containing Reference Group resolutions, a revised Land Transport Standards and Guidelines document and revised Regulation Impact Statement. These will be released publically after final Reference Group deliberations.

Forty four written submissions have been received relating to the draft Standards and Guidelines and the Regulation Impact Statement. These have been analysed and are reported on in this document. A relatively low number of surveys questionnaires (72) have also been received. Submitters will not be responded to directly. Only organisational submissions are identified in this report.

The intention is to report where there is a need or a desire for change in the standards and guidelines and how this might be accomplished. This document is based on proposals for change in the current draft Standards and Guidelines for the Land Transport of Livestock and follows the format of the proposed standards and guidelines where possible.

The proposed Standards and Guidelines (and Option B in the RIS) is the default option and stakeholder support for this position is generally not mentioned in this report, or is presumed. All submissions have been used to help provide an indication of the weight/volume of concern about and/or support for particular aspects of the Standards/RIS. Where there has been a simple error of fact or interpretation of the proposed documents – this is not mentioned or corrected in this report. Communications with the stakeholder may have occurred to clarify issues of concern. There are many cases of guidelines being proposed to become standards, if accepted, the resultant action could be to redevelop or delete the guideline, and recommendations may have been made for this subsequent action. There are many cases of proposed standards that are more appropriately considered as guidelines and this course of action has been recommended for some proposals. Changes to standards and definitions will have legal implications.

The proposed categorisation of issues in this report is:

1. Irrelevant, not understood or factually incorrect material – no further action, explanation may be given.
2. Minor correction or clarification – changes assembled for Reference Group consideration, including all guideline changes proposed. Each section covers submissions and recommendation for; standards, guidelines, definitions and notes.
3. Significant specific issue but no new solutions proposed in the context of previous Reference Group discussions – no further action but an explanation provided in the body of the report which may be further discussed.
4. Significant specific issue described, to be further considered by the reference group (SRG7) or subject to further collaborative working group process. All new standards.
The proposed decision criteria for making changes in the review of standards and guidelines are:

1. Potential animal welfare benefit. The proposal leads to a worthwhile improvement in the welfare of livestock during the transport process.

2. Volume and authenticity of responses. The number and variety of responses that indicate shared concerns and the depth of reasoning behind these concerns and the proposed solutions.

3. Alignment with existing animal welfare concepts expressed in existing laws and the Standards and Guidelines proposal. The proposal does not contradict or confuse other laws or proposed standards and guidelines.

4. Practicality in terms of industry implementation. The proposal is able to be implemented by industry with reasonable adjustment and cost.

5. Practicality in terms of regulatory implementation. The proposal is able to be implemented by government with reasonable adjustment and cost.

6. Relationship to previous Reference Group proposals and discussions. The proposal has not been previously rejected by the Reference Group in the context of the current standards and guidelines framework.

7. Previously unrecognised science basis. The proposal is based on scientific research that has not yet been recognised and evaluated by the Reference Group.

8. A clear, essential and verifiable approach is recommended. Preference is given to standards and guidelines that are; prescriptive, address real animal welfare concerns and are able to be measured or audited.

9. A greater balance is achieved and omissions corrected. The proposal better addresses an animal welfare issue than existing clauses or fills in a gap in the current proposal.

10. Factually correct. The proposal represents a correct interpretation of the correct version of the proposed standards and guidelines.

The list does not signify an emphasis that may be applied to the justifications and in most cases there will be multiple reasons for a decision. Only the main reason for a recommendation in this draft report is cited. In most cases there will be several of the above points that will be relevant for each issue.

Specific issues are grouped in themes and are presented in the context of; background information of relevance, submissions and considerations and proposed actions.

It has not been possible to generally recognise individual submissions in this report. In all cases the concerns raised by individuals have been also raised by organisations, and therefore the issues have been identified in this report. Acknowledgement is generally given to the degree of interest and effort that has gone into these submissions. In particular, the ongoing efforts throughout the development process of RSPCA Australia and Animals Australia, is acknowledged.
GENERAL ISSUES

These wider issues have been discussed comprehensively during the development process and are not intended to be further discussed in detail. They are relevant to the planned revision of the Standards and Guidelines Development Plan for all future livestock welfare projects.

Scope – relationship between the standards and guidelines

The document contains standards that are general and outcomes based or are detailed and prescriptive, or a mixture of the two types. The value of the general standards has been agreed by the majority of the Reference Group. The use of general standards has been minimised as it is recognised that it creates a need for further explanation or interpretation. The guidelines are not written to describe how to meet these standards but describe a better welfare position than the standard. The overall philosophy is that the private sector has the prime responsibility for livestock welfare and that this document will provide a basis for determining acceptable practices. Government regulation resulting in prosecution action is the option of last resort.

- **Standards** — The acceptable animal welfare requirements designated in this document. The requirements that must be met under law for livestock welfare purposes. The standards are intended to be clear, essential and verifiable statements; however, not all issues are able to be well defined by scientific research or are able to be quantified. Standards use the word ‘must’.

- **Guidelines** — The recommended practices to achieve desirable animal welfare outcomes. The guidelines complement the standards. They should be used as guidance. Guidelines use the word ‘should’. Noncompliance with one or more guidelines will not in itself constitute an offence under law.

- **Notes** — Explanations of the context of the standards and guidelines (the notes are advisory statements for selected background information).

The Dairy Industry, MLA, APL supports the statement that “non compliance with one or more of the guidelines will not in itself constitute an offence under law”, but does not support a process whereby the guidelines are referred to or legislated within state or territory legislation. AMIC recommend that all of the guidelines are rewritten as ‘compliance guidelines underpinning the standards, or are separated out from the document. AMIC prefers earlier definitions of the guidelines. SCA is concerned about the large number of guidelines and the apparent duplication within them. LTA WA has concerns about the relationship and suggests that greater clarity is achieved for industry. HAW believes that the standards should be set at a higher level and incorporate more guidelines. CCA, MLA, APL, ACMF, ACGC supports the status quo. AHA tenders the diagram at attachment three for information.

The standards do not relate to live exports from Australia to another country. Any recommendations in relation to ships, aircraft or the live export process cannot be accepted in this report.
Scope – feral livestock

AACT raise the general concern that the transport of feral livestock is a particular concern that they believe is not well addressed in the proposal. It is believed by AHA that adequate recognition is made to this risk category in the general standards and guidelines that cover handling, water provision, spelling, segregation, etc. There are no prescriptive standards that focus on the particular issue of ‘wild’ livestock. Additional guidelines may be of benefit.

Language

There is an issue with the guidelines being interpreted as mandatory or underpinning, which they are not. The consistent use of the word ‘should’ in the voluntary guidelines has also created difficulties as the term is closely allied to the term ‘must’ and conveys a much stronger position than that intended in many cases. This could be partly solved by the use of another term such as ‘recommendation’. Alternative use of words in the guidelines such as; ‘could, may, can, might,’ may help understanding. This matter has been considered previously and AHA suggests that revision on the basis of the document intentions being more effectively conveyed might be considered in future reviews. The issue has become particularly apparent with comments from stakeholders who have not been closely involved in Reference Group deliberations.

There is a minor issue with some stakeholders believing that greater emphasis must be applied in the wording of the standards to reinforce and clarify the intention. The use of ‘only’ after ‘must’ is an example of this. In general the use of ‘must only’ is not adopted. An economy of words is pursued in the standards with minimal descriptive terms.

Definitions

The definitions proposed are an integral part of the draft document and are important to achieve consistent implementation of the standards. It is equally important for the process that the definitions are agreed and adopted. There are general concerns about the use of terms such as ‘competency, effective, reasonable, at the first opportunity, excessively, appropriate, known to be, minimise the risk of, acceptable, habitually, significantly, hot and cold, etcetera’, which have not been and are not intended to be, specifically defined. AL Qld, Lawyers for Animals recommend that all terms are explicitly defined. Further definitions are proposed.

General Standards

The use of general, non-prescriptive standards creates a dilemma for regulators and industry and is a double-edged sword. The use of the phrase; “to minimise risk to the welfare of the livestock” relies upon a common understanding of what is ‘reasonable’ in livestock transport in those areas where a complex interaction of factors make it difficult to create an acceptable prescriptive rule for the country. The expectation of what is ‘reasonable’ may be different between the livestock industries and the community. This conundrum may require prosecution test cases and over time community expectations may change. This development process has also created a big opportunity for all three sectors of stakeholders
to work together to develop or refine agreed industry guidelines on a regional or national basis and to focus research investment on contentious issues.

AWWG support the notion and value of general standards and there has been a conscious effort to develop the best option for clear, essential and verifiable standards where possible. Of the 110 standards proposed in the draft, approximately 14 standards are general or have non-prescriptive elements. All data from the Model Codes of Practice for the Welfare of Animals (MCOP) has been migrated into the standards with the exception of loading density guidelines. Contrary to AWWG member views, DAFWA believe that most general, non-prescriptive standards are not verifiable and recommends that they be reworded to facilitate use in regulation if possible or converted to guidelines.

RSPCA Australia seeks assurance that the non-prescriptive standards will be strengthened and made more enforceable. RSPCA Vic believes that the S&G are less enforceable than the MCOP where these existed. Animals Angels does not support the use of outcomes based legislation, particularly when combined with a lack of a reporting and oversight mechanism. They have particular concerns with the use of ambiguous and undefined terms in standards that are not auditable and they support a more prescriptive approach. LOBSA SA supports the need for more prescriptive standards, including the development of many of the guidelines into standards. They believe that issues that require discretion and judgement may be left as guidelines but that the guideline principles are to be made clear.

Lawyers for Animals recommend that the standard of proof that an individual or corporation has failed to ‘minimise the risk to the welfare of animals’ be reduced such that the regulatory authority only be required to evidence a breach of the standard ‘on the balance of probabilities’ rather than ‘beyond a reasonable doubt’. This would then require the accused to prove that they did not breach the standard beyond a reasonable doubt. To justify this reversal they suggest that proving animal cruelty charges is significantly different to proving criminal charges because proof of animal suffering or risk to welfare is presently far more difficult to establish in law. They do not support scientific research as they believe that it obfuscates the issues of animal welfare. CCA, MLA, VFF have stated support the use of available science in the standards development process and this is a well recognised principle in this development process.

**Specific standards**

RSPCA Vic believes that each species section must describe and address the following issues in the standards:

1. fitness to travel
2. handling and segregation during transport
3. water deprivation
4. spelling requirements
5. stocking density at normal and extreme weather conditions
6. facilities
7. special conditions e.g. pregnancy, injured animals, and drought
8. **humane destruction**

They point out correctly that for most species (section B) the above issues are covered in the guidelines and they recommend that the points under the guidelines be moved to the standards. For example under SB6, stocking densities, handling, vehicle specifications and fitness of animals are not described for ratites. The issues where there are consistent standards across the species are; time off water, spelling, pregnancy, electric prodders, dogs and humane destruction. There is coverage of generally relevant matters by the Part A standards and other species standards as believed relevant by the Reference Group. Matters not considered by the standards may be subject to a recommendation in the guidelines. New standards will be considered if the proposal can be justified on the 10 point decision criteria.

**Consistent implementation**

The CCA, MLA, APL, Dairy Industry continues to support the development of a Deed of Understanding or similar binding commitment between all states, territories and Federal Government as to national consistency in legislation of the Standards. CCA also strongly support the need for participation in the implementation process to achieve consistent results. RSPCA Australia requests that the Federal Minister seek a 2 year implementation target post PIMC endorsement. VFF are concerned that the future cost of industry QA audits represents a transfer of government enforcement costs for community benefit. Animals Angels are concerned about a lack of reporting of welfare issues and enforcement and the level of jurisdictional resources devoted to the task. A Angels highlight the recognised role of industry in delivering a high standard of livestock welfare. STAC and others recommend the formation of an ‘Independent National Animal Welfare Body’ that will have precedence over s109 of the Australian Constitution (free trade between states) in relation to the welfare of animals and deliver federal legislation.

**Revision process**

The APL, CCA, Dairy Industry would only support changes to the draft Standards and Guidelines if there is an opportunity for further input and that any changes are scientifically sound, not excessively prescriptive and are proportionate to the animal welfare concern. Further assurances will be sought from government that any significant changes required are referred back to stakeholders for consideration.

**Communication and extension**

There is a huge need for tailored communications with relevant industry sectors at the time of implementation. ALFA feel that the concept of ‘time off water’ in particular requires a communication effort. There will need to be consideration of how this might be achieved by stakeholders.

**International standards**

Comparisons and justifications to other countries standards are not provided in this report. The proposed standards are intended to equal or exceed references in the OIE Terrestrial Animal Health Code (2007) – Guidelines for the Transport of Animals by Land. A small number of relevant features from other international standards including; New Zealand,
Canada, USA and UK are taken into account. The proposed standards are not based on EU Directives and Regulations despite the wishes of some stakeholders including Animals Angels who also provide a comparison to New Zealand standards. APL, APF raise the issue that pig transport in Canada and the USA is conducted at a lower standard than that proposed in Australia and the financial impacts on the pig industry must be considered.

A comparison to the OIE Guidelines warrants the following discussion on a few significant and relevant differences:

Basically both documents are substantially in agreement on issues of importance, not-with-standing that the OIE code only contains guidelines and more general information on livestock handling. Both documents cover the same species and follow the principle of article 3.7.3.1 ‘the amount of time animals spend on a journey should be kept to the minimum’. The OIE guidelines suggest that there should be resting points at appropriate intervals during the journey and this is equivalent in the Australian context to ‘voluntary spells’ guidelines. There are a number of areas like this where a difference in terminology obscures an easy comparison. The Australian standards and guidelines do not have to deal with cross border situations that may impact upon livestock welfare.

In responsibilities, the OIE requires in article 3.7.3.3 4 e that transporters ‘produce a journey plan which includes a loading plan, journey duration, itinerary and location of resting places’. This sounds more mandatory compared to GA1.3 vii) but it is not clear that this is the case. In Australia it is accepted that transporters have a clear responsibility to plan for the journey but they do not have to produce a plan and documentation is only mandatory for journeys reasonably expected to be longer than 24 hours. There is generally a higher demand in the OIE code for veterinary expertise to determine fitness or treatment options.

The OIE document has a focus on disease control requirements that are not directly related to livestock welfare in transport and this is not apparent in the Australian standards and guidelines, e.g. article 3.7.3.3 5 f – facilities for washing and disinfecting vehicles, article 3.7.3.5 9 control of disease.

OIE Article 3.7.3.7 3 c fit to travel excludes pregnant animals in the last 10% of their gestation period – Australia has a set of standards that allow the appropriate movement of pregnant animals with reducing journey length with advancing pregnancy and no absolute bans. The OIE does not recommend the transport of females that have given birth in the previous 48 hours. Australia is not expressly specific about this, other general standards apply.

The use of electric prodders is an issue with the OIE recommending a higher standard with the exclusion on sheep, goats and use on the belly region, but a lower standard by permitting use in pigs. OIE handling requirements are possibly lower with manual lifting by only the wool, head limbs etc, ‘not permitted, except in an emergency where animals welfare or human safety may otherwise be compromised’. Australia does not have such an exemption to its standard.
Consultation and consensus in development

RSPCA Australia has concerns that AHA is not an independent body in the development process and suggests that the Writing Group is more broadly representational. RSPCA Vic suggests that some stakeholders have been given too much influence in the development process. At all times the development process has been inclusive and no extra rights have been accorded to any party. The decision making process is conducted at the Reference Group level and is based on logic, values all opinions and is not set up to ‘out vote’ any stakeholder or group.

Regulation Impact Statement - Base Case

Background
The Regulation Impact Statement (RIS) has been developed in conjunction with the Reference Group. There are a number of assumptions and limitations that well recognised in this complex and lengthy document. In general terms, the RIS is accepted to be sufficiently accurate for the intended purpose.

Submissions
The issues that have been raised have been discussed at length by the Reference Group. SCA disagree that the MCOP are relevant as the base case, but do not propose an alternative. MLA recommends that the base case is a detailed review of the current situation in each jurisdiction. RSPCA Australia suggests that there are deficiencies with the general handling of issues that have been difficult to quantify and in particular, bobby calves, and questions the choice of the preferred option. RSPCA Vic feel that some of the choices for the RIS options have been too arbitrary and do not reflect the best options for livestock welfare and therefore they do not support any option. NSW FA believes that the costs have been under-estimated as do VFF who suggest that the costs will be borne mostly by primary producers.

Actions
No new data or argument was made available during the consultation process. The underlying methodology of the RIS will not be revised. The RIS will have to be revised to take into account changes to any standard as proposed below in this report.
SPECIFIC ISSUES

SA1.1 Responsibilities

Background
Comprehensive debate has occurred on this key issue to recognise where the ‘duty of care for livestock welfare in transport’ properly exists, particularly around loading and the question of assessment of fitness to transport for the intended journey. The standard sets out the default position and it is recognised that loading responsibilities are not easily defined and all these responsibilities may be varied by commercial arrangements. A court of law will decide the facts of a case where there are disputed responsibilities. Rail transport only occurs in Queensland for cattle, sheep and horses. The many aspects of responsibility are covered by numerous other standards.

Table 1: Usual responsibilities for livestock welfare (SA1.1) at all stages of the transport process.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Person responsible for livestock welfare</th>
<th>Other relevant Part A standards including responsibilities</th>
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<tbody>
<tr>
<td>Mustering and assembly</td>
<td>Consignor</td>
<td>SA2.1, SA5.6, SA5.7, SA5.8, all SA6</td>
</tr>
<tr>
<td>Handling, selection and waiting periods before loading</td>
<td>Consignor</td>
<td>SA1.2*, SA2.1, SA4.1, SA4.2, SA4.3, SA4.4, SA5.2, SA5.6, SA5.7, SA5.8, all SA6</td>
</tr>
<tr>
<td>Loading, transport and unloading, including spelling periods</td>
<td>Transporter</td>
<td>SA1.2, SA2.1, SA3.1, SA4.1, SA4.2, SA4.4, SA5.1, SA5.2, SA5.3, SA5.4, SA5.5, SA5.6, SA5.7, SA5.8, SA5.9, SA5.10, SA5.11, SA5.12, SA5.14, SA5.15, all SA6</td>
</tr>
<tr>
<td>Holding time after unloading</td>
<td>Receiver</td>
<td>SA2.1, SA5.6, SA5.7, SA5.8, SA5.13, all SA6</td>
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</table>

* Standards in bold are relevant to water provision/journey length responsibilities.

The key principle is that the ‘Person in Charge has a duty of care’ to ensure the welfare of livestock under their control (SA1.1) and must generally take into account all the relevant factors to minimise the risk to the welfare of livestock including the time spent off water by the livestock (SA5.2) which includes the length and nature of the journey, loading density (SA5.3), segregation (SA5.5) and handling (SA5.6, 5.7 & 5.8).

Loading density decision making is a key issue and is also covered by SA5.4.

Submissions
AMIC suggest that this standard is a definition that is important for consistent implementation and that the concepts need to be preserved, possibly in the scope section. MLA point out that the consignor may have responsibility for loading, and this is certainly the case for rail. SCA point out that SA1.1 states that the transporter is responsible for loading and consequently GA1.2 requires revision to be consistent. There is an issue of being able to define when the responsibility for livestock being loaded is transferred from
consignor to transporter – it is believed that this could be a shared responsibility and the circumstances will vary. APF makes the point that pig farms have strict biosecurity rules and drivers do not go beyond the loading ramp and vice versa for farm staff. DPI&W Tas, LTA WA, PACAT require clarifications to the consignor/driver responsibilities around loading where there is a proportion of dual responsibility. DAFWA believe that this standard is not verifiable and recommends that it be a guideline.

The following proposal is made to SA1.1 on the basis of volume and variety of submissions:

‘SA1.1 A person in charge must exercise a duty of care to ensure the welfare of livestock under their control and compliance with the livestock transport standards.

The responsibility for livestock welfare (excluding poultry) in the transport process is:

i) the consignor for the mustering and assembling of livestock
ii) the consignor for the handling, preparation, including selection as ‘fit for the intended journey’, feed and water provision and holding periods before loading.
iii) the transporter for the loading, journey and except rail the loading, loading density (excluding poultry) and unloading, including final inspection selection as ‘fit for the intended journey’ during loading, and additional inspections of livestock and spelling periods during the journey.
iv) the receiver after unloading.
v) for poultry the pickup crew is responsible for the loading, loading density and final assessment as fit for the intended journey. The receiver is responsible for the unloading.
vii) for rail in Queensland, the consignor is responsible for loading, the Rail Authority is responsible for the livestock during the journey.
vii) the master of the vessel when transporting by vehicle over sea (to be included in definitions).

An alternative is to propose a new standard for livestock responsibilities relating to rail.

SCA propose a change to GA1.2 to align with the current SA1.1 which has been recommended for revision that will make this change redundant:

GA1.2 The livestock consignor is responsible for the livestock until they are to be loaded onto the transport vehicle. This responsibility should include but is not restricted to: (7 points).

SCA further propose the following additions to the guidelines:

GA1.3 The driver or transporting company is responsible for the livestock from the point of loading of livestock (including inspection and assessment of livestock immediately before loading), to the point of unloading and notifying the receiver of the livestock at the destination. This responsibility should include but is not restricted to:
being competent in their tasks and key activities to meet the provisions of these standards and guidelines

GA1.4 The person at the destination is responsible for the livestock from the point of unloading and notification of livestock being received. This responsibility should include but is not restricted to:

- handling and managing livestock in accordance with the provisions specified in these standards and guidelines

SCA propose the deletion of GA1.8 as they consider it to be adequately covered by GA1.3ii) and GA2.1iv). There is some validity in this observation but also a case for preserving this guideline in chapter five.

GA1.8 Where information is not provided on water and feed provision for livestock being transported, the transport company, driver or agent should take action to obtain these times. This will allow determination of:

- the total time off feed and water, including mustering
- when the livestock have to be spelled or fed.

**Rail Transport**

RSPCA Qld and DPI Qld note that the situation for responsibilities during rail transport of livestock in Queensland is different to road transport and the document must be further adjusted to recognise the practical differences that exist. The proposed changes are considered to be minor in the context that few livestock welfare problems occur during rail journeys with the systems in place.

With Queensland Rail the system is:

- the train driver has no direct responsibility at any time
- the owner/owners agent is responsible for loading
- QR is responsible whilst they are on the wagons. QR supplies Stockcare Attendants to monitor the animals enroute
- the owner/owners agent is responsible for unloading
- spelling is the responsibility of the owners/owners agent

**Actions**

The changes recommended to and then supported by the majority of the Reference Group for rail to clarify responsibilities are considered to be a minor change and are:

The following proposal is recommended on the basis of volume and variety of submissions:

1) as below in SA1.1, noting that the ‘transporter’ can include the Rail Authority and the Stockcare Attendant
2) SA5.10 exclude rail
3) SA5.11 exclude rail
4) SA5.12 include Rail Authority (through the agency of the Stockcare Attendant)
5) SA5.14 include Rail Authority (through the agency of the Stockcare Attendant).
SA1.1  A person in charge must exercise a duty of care to ensure the welfare of livestock under their control and compliance with the livestock transport standards.

The responsibility for livestock welfare in the transport process is:

i. the consignor for the:
   - mustering and assembling of livestock

ii. the consignor for:
   - handling,
   - preparation, including selection as ‘fit for the intended journey’,
   - feed and water provision and
   - holding periods before loading and loading.

ii. the transporter for the loading-journey (except rail):
   - loading
   - loading density (excluding poultry)
   - unloading
   - final inspection selection as ‘fit for the intended journey’ during loading
   - additional inspections of livestock and
   - spelling periods during the journey.

iii. the receiver after unloading.

iv. for rail in Queensland, the Rail Authority is responsible for the livestock during the rail journey.

v. the Master of the marine vessel for livestock on roll-on/roll-off livestock transport vehicles during a sea journey.

The alternative position to propose a new standard for livestock responsibilities relating to rail was not chosen by the majority of the Reference Group.

The issue of the definitions of ‘selection’ and ‘inspection’ have been clarified in the section on SA4.1.

The following revision to a definition is requested.
The acceptable animal welfare requirements designated **in the standards section** in this document. The requirements that must be met under law for livestock welfare purposes.

**Standards**

**Sea journeys**

The Master of the marine vessel is responsible for the welfare of livestock on roll-on/roll-off livestock transport vehicles that are not able to be attended by their drivers during the sea journey.

Requested by RSPCA Australia

Arose from Reference Group discussions.

The following changes to guidelines are recommended:

| GA1.2 | The livestock consignor is responsible for the livestock until they are **to be** loaded onto the transport vehicle. This responsibility should include but is not restricted to:
|       | - selecting livestock to make sure that they are fit for the intended journey
|       | - providing feed, water and rest before curfew or loading, as appropriate
|       | - providing suitable holding and loading facilities that do not predispose livestock to injury
|       | - providing suitable shelter and protection for the elements for susceptible animals such as young stock

Proposed by DPI Vic

| GA1.3 | The driver or transporting company is responsible for the livestock from the point of loading of livestock (including inspection and assessment of livestock immediately before during loading), to the point of unloading and notifying the receiver of the livestock at the destination. This responsibility should include but is not restricted to:
|       | - being competent in their tasks and key activities to meet the provisions of these standards and guidelines
|       | - taking action to determine the time that livestock were deprived of water and for unweaned livestock liquid feed, from the previous owner or person responsible, including time without water during assembly, holding, loading or previous transport
|       | - inspecting and assessing livestock at loading to ensure that they are fit for the intended journey
|       | - inspecting livestock during the journey as required and taking action if a problem arises that affects the welfare of the livestock
|       | - making sure that the management, care or humane destruction of any livestock that are judged as weak, ill or injured during the journey is appropriate

Clarification – consistent with GA1.3 point iii).

Proposed by DPI Vic.

Proposed by DPI Vic.

Proposed by DPI Vic.

Proposed by DPI Vic.

Proposed by DPI Vic.

Poultry to be treated
| GA1.4 | GA1.4 The person at the destination is responsible for the livestock from the point of unloading and notification of livestock being received. This responsibility should include but is not restricted to:  
  - handling and managing livestock in accordance with the provisions specified in these standards and guidelines | Proposed by SCA |
| GA1.5 rail | ensuring that the journey is planned and managed with consideration of:  
  - the condition, species and class of the livestock  
  - route and duration of the journey including railway stop locations for shunting, inspection or delays due to high priority freight  
  - weather conditions and railway stop locations  
  - the provisions in these standards, such as water deprivation time, spelling and loading density | Recommended by QDPI |
| GA1.8 | Where information is not provided on water and feed provision for livestock being transported, the transport company, driver or agent should take action to obtain these times. This will allow determination of:  
  - the total time off feed and water, including mustering  
  - when the livestock have to be spelled or fed. | SCA propose deletion on the basis of duplication in GA1.3 ii) & GA2.1 iv). Deletion not supported by majority of the Reference Group |
| GA1.17 | If unexpected delays occur, such as vehicle breakdown, the driver should make every reasonable effort to minimise the delay and ensure that water is provided within the times specified in the standards. |  |

**SA1.2. Longer journeys, contingency plans, verification of water deprivation time, communication of key information**

**Background**

These issues have been debated comprehensively in the development process. Currently SA1.2 requires a document that states the date and time livestock last had access to water if
the journey is reasonably expected to exceed 24 hours and the current standard represents comprehensive previous Reference Group discussions on the four issues in the title. In previous drafts there was a standard requiring the documentation of this information for all journeys (the standard SA1.3 from the post SRG4 15/9/07 version) and also contingency plans, that was subsequently removed.

SA1.3 A person transferring responsibility for livestock must communicate relevant information for the management of the welfare of the livestock to the next person in charge. Information may include:

i) Last access to water

ii) Last access to food

iii) Last rest

iv) Any other information required to manage the risk of the welfare of the livestock to be transported.”

Food provision is a lesser consideration than water for the relatively short times for most journeys. Standards for feeding are proposed for:

- calves (SB4.4, SB4.5), emus and ostriches (SB6.2, SB6.3), and poultry (SB10.2, SB10.3)
- species that can be fed on the vehicle on extended journeys, including alpacas (SB1.2), camels (SB3.2), horses (SB8.2) and pigs (SB9.2)
- ratites (SB6.2, SB6.3), horses (SB8.5) and poultry (SB10.2, SB10.3).

The term ‘spell’ defines a period of rest when livestock are required to have access to water and space for all livestock to lie down, on or off the vehicle (SA5.1, SA5.2 and Part B standards), for their recovery. The relationship between maximum permitted time off water and the requirement for a spell and the use of spelling in transit, governs how a multi-sector journey is undertaken in relation to the welfare requirements for the livestock. It is believed that the comprehensive arrangements in place are adequate and the main concern is for longer journeys exceeding 24 hours.

Planning is an integral part of the transport of livestock that occurs in the ordinary course of activities and the current position does not require a standard for livestock welfare. Similarly, vehicle construction, maintenance, operation and contingency matters are more appropriately covered by other processes in the ordinary course of transport business. The standard for contingency planning (SA1.2) requires details of appropriate emergency contacts to be carried in the vehicle for journeys in excess of 24 hours.

The general guideline (GA5.46) describes how an unexpected substantial delay should be managed for the best possible livestock welfare outcome. Compliance with this non-mandatory guideline would provide a defence against a charge of cruelty or of exceeding the water deprivation times under these standards.
Submissions

ALFA, A Angels would like to see an auditable procedure for transferring the time of water information with the livestock through the transport process. LTA WA also recommends this and that it be extended to include a declaration of last time fed. LTA WA recommends that the NVD becomes the relevant document and is revised to facilitate this. AA recommends that SA1.2 is amended from 24 hours to 16 in line with national driver fatigue management laws, Horse SA, PACAT, A Angels – 12 hour journeys, AL SA – 8 hours. RSPCA Qld, LOBSA SA, AACT, PACAT recommends that detailed, auditable records are available for all livestock journeys. RSPCA Australia also recommends that the issue be given greater emphasis for all livestock journeys and are particularly concerned about loss of water management information through the saleyard system. Some stakeholders have objected to the use of the term ‘reasonably expected’ and requested replacement with a more defined term such as ‘will’. RSPCA Vic raise the issue of feeding times and want greater emphasis placed on emergency contacts, requesting “all emergency contacts for all stages of the journey” but it is felt that this does not add anything of value to the standard as writ. The proposal for consideration is:

| SA1.2  | “For all journeys / a journey reasonably expected to will exceed 8-12-16 24 hours, there must be one or more documents that accompany the livestock and that specify: |
| |  |
| | i) the date, duration and time that the livestock last had access to water and feed |
| | ii) the date and time of livestock inspections and any livestock welfare concerns and actions taken identification of inspector |
| | iii) all emergency contacts for all stages of the journey, documentation of a full travel plan. |

A person in charge who is transferring responsibility for livestock to be further transported for longer than 24 hours must provide a document with this information to the next person in charge.”

Contingency plans

AA, AMIC, A Angels recommend the inclusion of a documented contingency plan in SA1.2, currently the only standard is for a list of emergency contacts (SA1.2 iii)). RSPCA Qld, AL SA wish to see the all the contingency guideline material covered in GA1.13 – GA1.19 be made into a standard resulting in a written journey plan. There is also discussion about contingency extension to time off water in the time off water section.

Actions

It is not proposed to recommend any changes to SA1.2 on the basis of previous comprehensive Reference Group discussions and this was supported by the majority of the Reference Group. AA have a point about the impact of driver fatigue management, practically limits the relevant journey time to 16 hours or less in any 24 hour period.

| SA1.2  | For a journey reasonably expected to exceed 24 hours, there must be one or more documents that accompany the livestock and that specify: |
| |  |
i) the date and time that the livestock last had access to water

ii) the date and time of livestock inspections and any livestock welfare concerns and actions taken

iii) emergency contacts.

A person in charge who is transferring responsibility for livestock to be further transported for longer than 24 hours must provide a document with this information to the next person in charge.

Further definitions have been requested:

<table>
<thead>
<tr>
<th>Document</th>
<th>A document for livestock movements is any written record. It may be, but is not restricted to:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• an existing document, such as a consignment sheet, health certificate, national vendor declaration or equivalent, an invoice, a waybill, a diary entry or other documentation</td>
</tr>
<tr>
<td></td>
<td>• another record that shows the person(s) in charge responsible for livestock during the transport process, including yards.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Record</th>
<th>A written document or an accessible electronic record</th>
</tr>
</thead>
<tbody>
<tr>
<td>Requested</td>
<td>by RSPCA Australia</td>
</tr>
</tbody>
</table>

**SA2.1. Competency and training**

**Background**

Comprehensive debate has occurred on this key issue of competency and its definition. The present situation does not have the capacity for a large amount of rapid change towards a national scheme for training and certification. As a consequence, the guideline GA2.2 describes the current system that provides assurance of competency.

Supporting evidence of competency should include any of the following:

- records of on-the-job training
- relevant experience
- recognised training and staff training registers
- induction training
• supervisor sign-off for specific tasks.

Submissions
Most stakeholders support the proposed standard with several industry members cautioning about the current labour force shortage within primary industries and the need for workable arrangements. Requests have been made to recognise the importance of national training and accreditation.

CIWF, A Angels support training, accreditation and certification of all competency issues by the relevant competent authority based on the EU system. PACAT, AL Qld, AL SA, A Angels, HAW, STAC supports a national training and accreditation scheme. STAC believe that the appropriate level should be certificate IV. Lawyers for Animals propose that a time limit of 6 months be placed on the attainment of competency. STAC also believe that the Police Service National Training Package must be reviewed to update and allow police to be more active in animal welfare roles.

Requests have been made to alter the chapter two guidelines, covered in the table below. AA, AL Qld recommends a requirement for accredited testing to demonstrate competency, particularly in relation to humane destruction. AMIC request a removal of the elements of competency from the definition to the guidelines only. DPI&W Tas suggest that the standard is too subjective for enforcement but also that establishing a competency framework is beyond the scope of this project.

Humane destruction has been a particular issue with further discussion in that section. RSPCA Vic proposes that operators must also be competent in the techniques of bleeding out and pithing. ACMF point out that it is unreasonable for commercial poultry transporters to be required to humanely destroy poultry enroute and PACAT points out that it lack of humane killing competency is a major deficiency of drivers.

Action
No change is recommended to the standard. The following recommendation is made for a new guideline but this was not supported by the majority of the Reference Group:

| GA2.X | “National training and accreditation programs based on a national competency framework for livestock welfare in transport should be developed.” |

Further minor changes to the guidelines are proposed.

<p>| GA2.1 | Elements of competency for each phase of the livestock transport process should include: | Proposed by SCA |
| GA2.1 vii) | identifying weak, injured or ill livestock and other behavioural signs of distress that are relevant for assessment as being fit for the intended journey, and taking the appropriate remedial action as relevant. | Recommended by QDPI |</p>
<table>
<thead>
<tr>
<th>GA2.2</th>
<th>Supporting evidence of competency should include any of the following:</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>• records of on-the-job training</td>
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<td></td>
<td>• relevant records of experience</td>
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<td></td>
<td>• recognised training and staff training registers</td>
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<td></td>
<td>• induction training</td>
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<td></td>
<td>• supervisor sign-off for specific tasks.</td>
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</table>

Proposed by SCA, MLA, WPA, AgForce Sheep and Wool, VFF consistent with definition used and OIE 3.7.3.4.

Further discussion on humane destruction occurs in the section on the issue.

**SA3.1 Vehicles and facilities**

**Background**

Comprehensive debate has occurred on this key issue of vehicle and facility standards for livestock welfare. Vehicles and facilities are covered by the standard SA3.1, which requires construction, maintenance and operation to be conducted in a way that minimizes risk to the welfare of livestock. Non-prescriptive elements relating to containment, ventilation, flooring, internal protrusions and vertical clearance are mentioned in the guidelines.

Additional requirements relating to some of these non-prescriptive elements are given in the species chapters for camels, cattle (calves), deer, emu, horses, ostrich and poultry. Other considerations relating to vehicle management and design considered to be issues of relevance to livestock welfare (such as container or crate cleaning, exhaust gas pollution, limb protrusion, bedding, partitioning, distractions and ramp design) are mentioned in the general and species guidelines.

The issue of height clearance and ‘normal’ or ‘natural’ positions for head carriage has been specifically covered in the standards for taller species e.g. camels (SB3.5) and horses (SB8.10).

**Submissions**

DAFWA, LTA WA believes that this general standard is not verifiable and recommends that it be a guideline. RSPCA Australia recommends a number of changes shown below, including that the vertical clearance clause (v) be strengthened to prevent contact with overhead structures when in a natural position. DPI Vic is of the view that guidelines should be developed for vertical clearance where there is an acknowledged risk to welfare AACT are also concerned about risk from overhead structures.

DPI Vic also supports more effective ventilation requirements such as contained in GA5.24-Ventilation should be appropriate at all times, including when the vehicle is stopped”. SCA recommend deletion of GA5.24 on the basis of the adequacy of SA3.1 ii).

GA5.24 Ventilation should be appropriate at all times, including when the vehicle is stopped.
AL SA recommends that GA1.19 – vehicle logs and maintenance records be made into a standard. Vehicle maintenance and contingency matters are more appropriately covered by other processes in the ordinary course of transport business.

RSPCA Vic wishes to see an additional point on bedding and cleaning.

A Angels has concerns about; dual use floors, ventilation with respect to the Temperature Humidity Index during stops, vertical clearance and the normal standing position.

STAC wish to see rubber flooring and shade on all vehicles.

The proposals considered are:

SA3.1 “Vehicles and facilities must be constructed, maintained and operated in a way that minimises risk to the welfare of livestock.

Vehicles and facilities must:

i) be appropriate to contain the species and to prevent limbs and other body parts from protruding

ii) have effective ventilation when moving and stationary

iii) have flooring that minimises the risk of injury or of livestock slipping or falling and allows the animals to lay down

iv) be free from internal protrusions and other objects that could cause injury; smooth sides inside

v) have sufficient vertical clearance for livestock to minimise the risk of injury and be able to stand in a normal position without contacting overhead structures

vi) provide bedding and be clean and dry.

RSPCA Vic raises the issue of the definition of “minimises risk to the welfare of livestock” – this is a general standard phrase that occurs in SA3.1 and subsequently in the standards. It is felt that the current definition resulting from several Reference Group discussions is adequate:

risk to welfare of livestock

The potential for a factor to affect the welfare of livestock in a way that causes pain, injury or distress to livestock. The outcome could include sunburn, hypothermia, heat stress, dehydration, exhaustion, abortion, injury, metabolic disease or death. These risks can be managed by undertaking reasonable actions to prevent or reduce the risk.

**Limb protrusion**

AA, DPI Vic proposes that GA3.7 becomes a standard, RSPCA Vic, HAW also support this position:

GA3.6 —— Limbs of livestock should not protrude from the livestock crate. Limbs should be contained within the livestock crate using an appropriate crate design, sound side panelling and appropriate loading densities.
SA xx  “Limbs of livestock must not protrude from the livestock crate.”

LTA WA cautions that this is a visual and emotive issue which would effectively require crates to be completely enclosed to eliminate the issue. The net result would be a worse outcome for livestock welfare and any change must be based on science. A Angels are also concerned about this issue but believe that it is mainly a loading density issue.

PACAT propose that all of GA3.1 to GA3.15 become standards that are redefined to be enforceable. This change is not recommended consistent with previous Reference Group discussions.

GA5.24 is proposed for deletion by SCA as covered by the standard SA3.1 ii). No replacement guideline is proposed.

| GA5.24 | Ventilation should be appropriate at all times, including when the vehicle is stopped. |

**Action**

None of the proposed changes to standards are supported for the following reasons. Confirmed by the majority of the Reference Group:

- Overall, standards relating to vehicles and facilities are considered sufficient. The guidelines cover all the areas raised.

- Limb protrusion is regarded as not practical to implement as a standard but a modification to the standard SA5.10 is proposed in that section.

- ‘Effective ventilation’ is accepted to mean when moving and stationary.

- ‘Normal position’ debate has occurred extensively. Standards are in place to address known welfare risks for certain species.

- Bedding is addressed as appropriate on a species/category basis – it is mostly not relevant or practical. Cleaning has been discussed at length by the Reference Group – adequate guidelines are in place to address the livestock welfare risk.

It is proposed to delete GA5.24 on the basis that it is covered by SA3.1 ii) but this was not supported by the majority of the Reference Group.

| GA5.264 | Air flow | Ventilation should be appropriate at all times, including when the vehicle is stopped. |

A clarification to a definition.

**livestock crate**  A structure on a vehicle used for transporting livestock, excluding poultry that are transported in containers.

The following minor changes are proposed:
Chapter 3 objective
Transport vehicles and facilities for holding, loading and unloading are designed constructed, maintained and operated to minimise risks to livestock welfare. Proposed by RSPCA Vic to achieve consistent use of wording. Constructions takes into account design and build aspects.

SA3.1 Livestock transport vehicles and holding, loading and unloading facilities must be constructed, maintained and operated in a way that minimises risk to the welfare of livestock.

Vehicles and facilities must:

SA3.1 ii) Replace all use of ‘ventilation’ with ‘airflow’ – about 20 usages

Proposed by QDPI.

GA3.54 Vehicle exhaust gases should not significantly pollute the livestock crate to avoid respiratory distress
proposed by RSPCA Australia

GA3.98 The floor of multideck vehicles, excluding poultry vehicles, should be constructed and maintained in a way that prevents the soiling of livestock on lower decks.

Proposed by LTA WA

GA3.132 Solid yard extensions should be used to cover any gaps between the loading ramp floor and the floor of the vehicle through which an animal or part of an animal might protrude go down.

GA3.1 Facilities, vehicles, crates and containers should provide a suitable environment to minimise the risk to the welfare of livestock from extremes of temperature, weather and humidity.

General guideline proposed by RSPCA Australia.

SA4.1 Fit to load, including pregnancy

Background
Comprehensive debate has occurred on this key issue of livestock fitness criteria for the intended journey. It is accepted that there are varying levels of journey and acceptable fitness requirements will also vary. Pregnancy issues are an example where short journeys are permitted to facilitate better management during parturition. Livestock must be assessed by a competent stockperson to be fit for the intended journey before every loading,
according to various visible criteria (SA4.1) that are either general or specific. This standard attempts to protect livestock welfare against common issues that may cause further risk to the welfare of the animal during transport and is based on the international OIE (World Organisation for Animal Health 2007) transport standards.

Any livestock judged as not fit for the intended journey must only be transported under specific veterinary advice (SA4.2). This standard permits a degree of flexibility relating to the ‘intended journey’ and the use of expert advice to manage livestock for the best welfare outcomes under a wide variety of circumstances. The primary responsibility for first selecting livestock to be ‘fit for the intended journey’ lies with the consignor, who will be the owner in most cases. The driver also has a responsibility for final selection. Additional specific fitness standards exist for horse lameness (SB8.7) and poultry (SB10.5).

**Submissions**

DAFWA, LTA WA believe that parts of this standard (SA4.1 ii, iii & iv)) are not verifiable and recommends that they be a guideline. PACAT wishes to see these parts subject to proper training and accreditation and clause vi) changed from 4 to 2 hours.

AMIC support the standard but recommend that the definition of ‘fit or fit for the intended journey’ is bought into line with the proposed wording of the standard by the replacement with the words in SA4.1 clause vi) and deletion of the words in the definition “Following the intended journey, they can recover their normal biological state in a reasonable time” and MLA, SCA, AgForce Sheep and Wool, VFF, TGFA support deletion of this sentence from the chapter five objective.

RSPCA Vic do not support the dehydration clause as a specific and suggest that it is replaced by ‘visibly ill or unwell” – which is covered by SA4.1 iii) – “not showing signs visible signs of distress”. SA4.1 is based on visible conditions that the stock person can observe – it is accepted that livestock may be approximately 10-15% dehydrated before clinical signs become apparent but there are no other practical methods of diagnosis in livestock.

A Angels request that animals within 4 weeks of parturition, 7 days of giving birth and lactating animals are excluded from transport. There are species based standards and guidelines that address these issues and adoption of this recommendation would require adjustment of these. CIWF recommend that a fit animal have sight in both eyes. This recommendation exceeds the OIE Guidelines and is not supported on the basis of previous Reference Group discussions. DPI Qld recommend incorporation of the clause “not severely emaciated” to more adequately address the issue of animals in poor condition. Previous decisions have been made to not include reference to Body Condition Scores (BCS), except for horse guidelines as they are regarded as subjective measures that may create a degree of precision where none is intended. The assessment of body condition scores is an expert matter but the broad principle of being too poor in condition for some journeys is accepted by the Reference Group.

The proposed changes are as follows:

Chapter five objective: “Livestock are handled, loaded, transported and unloaded in a manner that minimises risks to livestock welfare.
Livestock recover their normal biological state within a reasonable time after arrival.

SA4.1 “Livestock must be assessed as fit for the intended journey at every loading. An animal is fit for a journey if it is:

i) able to walk on its own by bearing weight on all legs

ii) not severely emaciated

iii) not visibly dehydrated

iv) not showing visible signs of severe injury or distress

v) free from conditions that are likely to cause increased pain or distress during transport

vi) not blind in any eyes

vii) not known to be, or visually assessed not to be, within 4 weeks of parturition, 7 days post parturition or lactating.”

<table>
<thead>
<tr>
<th>Definition fit or fit for the intended journey</th>
<th>Livestock are of sufficient health, vigour and condition such that they are:</th>
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<tbody>
<tr>
<td></td>
<td>• able to walk on their own by bearing weight on all legs</td>
</tr>
<tr>
<td></td>
<td>• not severely emaciated</td>
</tr>
<tr>
<td></td>
<td>• not be visibly dehydrated</td>
</tr>
<tr>
<td></td>
<td>• not showing visible signs of severe injury or distress</td>
</tr>
<tr>
<td></td>
<td>• free from conditions that are likely to cause increased pain or distress during transport</td>
</tr>
<tr>
<td></td>
<td>• not blind in both any eyes</td>
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<tr>
<td></td>
<td>• not visually assessed to be within 2 weeks of parturition unless the journey is less than 4 hours duration, not known to be, or visually assessed not to be, within 2 weeks of parturition, unless the water deprivation time and journey is less than 2-4 hours duration to another property.</td>
</tr>
<tr>
<td></td>
<td>• Following the intended journey, they can recover their normal biological state in a reasonable time.</td>
</tr>
</tbody>
</table>
selection of livestock

The process of inspection to ensure that livestock meets the criteria for the intended journey and the actions taken during the inspection to present the livestock for loading and transport.

AA recommends that GA4.3 is made into a standard to recognise the high risks associated with transporting livestock under special circumstances. This has been discussed previously by the Reference Group.

GA4.3 Records should be maintained of any livestock that are transported under special circumstances.

SA 4.x Records must be maintained of any livestock that are transported under special circumstances.

Conditions and veterinary advice prescribed further

AA recommends that GB11.2 be deleted on the basis that it provides an exemption to fitness requirements (SA4.1). This is a misinterpretation and the suggestion is rejected. RSPCA Victoria proposes that GB5.2, GB7.2 and similar guidelines should become standards and this is also not supported. Similar guidelines exist for all species covered and the intention of the guidelines is that the sub optimal health conditions mentioned are amongst those that might be considered in the decision making process for assessing risk to the welfare of livestock for an intended journey. SA 4.1 has aspects that are general and non-prescriptive and in any case health assessment requires competency. Where the livestock fitness for an intended journey is judged or assessed to be not fit, an appropriate veterinarian must be consulted for advice (SA4.2) if it is desired to transport the livestock. Where there is doubt about the level of livestock fitness for an intended journey an appropriate veterinarian should be consulted for advice (GA5.19, GA5.38). A Angels suggest that GA5.19 is incorporated into SA4.3. SCA, WPA, VFF seek deletion of GA5.19 on the basis of SA4.2 being in place for animals judged to be unfit, but this guideline is about consulting a vet if there is doubt about fitness for transport. Changes are not recommended.

GA5.19 Where there is concern about the assessment of fitness to load, veterinary advice should be sought.

DPI Vic recommends that GA5.38 is developed into a standard.

SA5.x “Where there is doubt about an animal’s fitness to resume a journey, the spell period should must be extended, veterinary advice sought, and action taken to care for any livestock that are rejected.”

Whilst this clause might be useful as a guideline, developing it into a standard confuses the decision making responsibility of the person in charge, meaning the livestock might be unfit – you must do something and this action would be difficult to verify. It would be more appropriate that the person in charge seeks appropriate advice (vet or otherwise) to make a decision and this principle is embodied in the current arrangements (SA4.2).

A number of stakeholders (including DPI Vic, AL SA, A Angels) have requested a
strengthening of SA4.2 to incorporate the principle of:

“Must only be transported under a signed veterinary authorisation after examination.”

A number of stakeholders (including DPI Vic, vets, AL SA,) have requested that GB4.5 be developed into a standard. This issue is considered to be covered by SA4.1 i) and SA4.4 as these animals would have a non-weight bearing lameness and could not be considered fit to travel. In most cases the appropriate action under SA4.4 would be humane destruction at the first opportunity following detection of the case. The new standard is not recommended as it is covered by existing standards as described.

GA4.5 Livestock with broken limb bones should be humanely destroyed unless veterinary advice recommends alternative measures.

SB4.X Livestock with broken limb bones must be humanely destroyed without delay, unless veterinary advice recommends alternative measures.

**Exemption for short journeys for treatment or better management**

ADF/DA is concerned that the current standards, SA4.1 – 4.4 does not permit short relocation of animals with fitness issues, without veterinary advice possible under SA4.2. They propose: SA4.1 vii) for a limited distance to allow treatment or effective management. Other stakeholders have suggested that this clause is necessary to allow injured animals to be taken to a veterinarian, before getting veterinary advice.

However, SA4.1 provides absolute requirements with an exemption for advanced pregnancy. Veterinary advice can be part of an ‘approved arrangement’ for an enterprise and does not necessarily mean a veterinary consultation for every time an unfit animal is required to be moved. The proposal is not necessary under the current arrangements of ‘fit for the intended journey’ that would allow appropriate movement for a limited distance to allow treatment or effective management and does not introduce any improvement in verification.

**Pregnancy**

AMIC notes that there are differences between the species in the number of standards and the gestational periods covered. This reflects the differing gestational lengths and the risk to the species involved. SA4.1 vi) is the major standard that brings consistent arrangements to the species. PACAT supports transport of animals in last trimester only with a written veterinary authorisation. PACAT wish to see removal of all of the ‘known to be’ phrases that were adopted because of the view that it is not reasonable that all livestock owners must know the pregnancy status prior to transport, but where known, they are bound to manage their livestock appropriately. A Angels request that there is a pregnancy declaration that includes the last 4 weeks of pregnancy and those animals in the last 4 weeks of pregnancy are not transported. A Angels oppose the transport of any animals in late pregnancy and suggest that all stock owners should know the pregnancy status prior to transport. This objection is not repeated for all the mammalian species. HAW does not support the transport of animals in the last two weeks of pregnancy.
“At the first opportunity”

A number of stakeholders have suggested alternatives to this phrase such as; “without delay, as soon as possible, immediately”. The phrase is first used in SA4.4 and then in a number of other standards and guidelines. The issue with this timing definition is the priority attached to the action. The matter is linked to the concept of ‘reasonableness’. It is expected that a livestock handler will have to justify reasons why an unacceptable delay has taken place in providing for livestock in need. Otherwise it is expected that the action(s) will be carried out as without delay. A definition is proposed:

“At the first opportunity” means that an appropriate action for livestock is undertaken without delay except where a reasonable delay is caused by a significant reason relating to; resources, skills, safety or the immediate welfare of other livestock.”

The need for a new definition was proposed by RSPCA Australia: AHA suggests the following:

Heat stress: a response by animals to hot conditions above their thermo-neutral limit that activates their behavioural, physiological or psychological coping mechanisms.

Visual signs of this response include; panting, tonguing, seeking shade and water, agitation.

The following minor change is proposed by DPI&W TAS for clarification. This change if agreed may also have to be applied to GB2.2, GB3.1, GB5.2, and GB8.2.

GB1.2 “Conditions that could decrease adversely affect alpaca welfare during transport that should be considered unfit for transport in the assessment of fitness for the intended journey might include; lethargic alpacas, and alpacas with profuse diarrhoea, disease, or wounds or abscesses. A decision to transport an alpaca with the above conditions should be made after considering the welfare of the animal concerned and the treatment and management options”.

Actions

No change is recommended to the chapter five objective as it is considered to be a good outcome based statement of objective with general support from other stakeholders, however the majority of the Reference Group decided to remove the second sentence. Pregnant and lactating females are discussed in the next section on time off water.

“Livestock are handled, loaded, transported and unloaded in a manner that minimises risks to livestock welfare. Livestock recover their normal biological state within a reasonable time after arrival.”

It is expected that the following issues will be further discussed in depth by the Reference Group.

The following changes are recommended:

SA4.1 “Livestock must be assessed as fit for the intended journey at every loading. An
animal is not fit for a journey if it is:

i) unable to walk on its own by bearing weight on all legs

ii) not severely emaciated

iii) visibly dehydrated

iv) not showing visible signs of severe injury or distress

v) suffering free from conditions that are likely to cause increased pain or distress during transport

vi) not blind in both eyes

vii) not known to be, or visually assessed not to be within 2 weeks of parturition, unless the water deprivation time and journey is less than 4 hours duration to another property.

The following changes to or new definitions are proposed:

<table>
<thead>
<tr>
<th>At the first opportunity</th>
<th>Means that an appropriate action for livestock is undertaken without delay except where a reasonable delay is caused by a significant reason relating to; resources, skills, safety or the immediate welfare of other livestock.</th>
<th>Proposed by AHA</th>
</tr>
</thead>
</table>
| fit or fit for the intended journey | Livestock are of sufficient health, vigour and condition such that they are:

- able to walk on their own by bearing weight on all legs
- not severely emaciated
- not be visibly dehydrated
- not showing visible signs of severe injury or distress
- free from conditions that are likely to cause increased pain or distress during transport
- not blind in both eyes
- not known to be, or visually assessed not to be, within 2 weeks of parturition, unless the water deprivation time and journey is less than 4 hours duration to another property.
- emaciated- Extremely thin body condition due to starvation or disease |
| Heat stress | When the A response by animals to hot conditions above their thermo-neutral limit activates exceeds the ability of their behavioural, physiological or | Requested by RSPCA Australia, amended by the |

Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock - Public Consultation Response Action Plan
<table>
<thead>
<tr>
<th>nature of the journey</th>
<th>Includes duration, distance, route, road conditions, terrain, traffic, prevailing weather and any other factors that could affect a journey for livestock.</th>
<th>Requested by RSPCA Australia</th>
</tr>
</thead>
<tbody>
<tr>
<td>selection of livestock</td>
<td>The process of inspection to ensure that livestock are assessed to be fit for the intended journey and the actions taken during the inspection to present the livestock for loading and transport.</td>
<td>clarification</td>
</tr>
<tr>
<td>Weak</td>
<td>Livestock that are sufficiently affected so they do not meet the ‘normal’ criteria for the journey but are able to be managed for successful transport without further compromising the welfare of the livestock.</td>
<td>Requested by RSPCA Australia, RSPCA Vic</td>
</tr>
<tr>
<td>welfare of livestock</td>
<td>Any component of the livestock welfare state that is recognised as being important for the species in question in an everyday sense. The normal expectations of welfare that would apply to a livestock species in a normal situation. This includes: access to water, food, shelter; the ability to express normal behaviours; and the provision of care to prevent pain, injury or disease.</td>
<td>Deleted by Reference Group, except Definition of Risk to the welfare of animals</td>
</tr>
</tbody>
</table>

The following minor changes are proposed:

GB1.2 “Conditions that could decrease adversely affect alpaca welfare during transport and should be considered unfit for transport in the assessment of fitness for the intended journey this might include; lethargic alpacas, and alpacas with profuse diarrhoea, disease, wounds or abscesses. A decision to transport an alpaca with the above conditions should be made after considering the welfare of the animal concerned and the treatment and management options”.

This change will also have to be applied to GB2.2, GB3.1, GB5.2, and GB8.2.
SA4.2 Any livestock judged assessed to be not fit for the intended journey must only be transported under veterinary advice. Use of consistent language ‘assessed’.

GA4.2 For journeys involving changeovers, livestock should be inspected for their continued fitness for the intended journey at each driver or vehicle changeover point during the journey. DPI Vic proposes incorporation in SA5.11 iv) added – see that section.

GA4.34 GA5.47 Effective management options for livestock considered not fit for the intended journey should include, but are not restricted to:
- effective containment in a suitable holding area
- rest
- provision of shelter, feed and water
- veterinary treatment
- humane destruction. Recommended by WPA, AgForce Sheep and Wool, VFF.

**SA5.1, SA5.2, Time off water limits and contingency extensions to time off water**

**Background**
Time off water is a key welfare consideration for livestock transport and a central part of the standards and guidelines. Considerable Reference Group discussions have gone into this area.

Livestock may be subjected to longer periods of water deprivation during transport than those permitted in normal management situations, where the livestock are capable of tolerating this stress in a managed situation. In Part B, water provision standards that restrict travel times apply to special categories of species defined by age, lactation and pregnancy (including SA4.1 vi). Providing water on the vehicle during transport is impractical for many livestock and this governs the length of time animals can be transported. Species that are often given access to water on a specialized vehicle during long trips include; alpacas, camels, horses and pigs.

Water provision is a key determinant for the welfare of livestock—responsibility extends across all persons in charge at various times during the movement process. The maximum permissible times that livestock could be without water specified in Part B does not diminish the responsibility of the person in charge to assess livestock to be fit for the intended journey at various times (SA1.1, SA4.3, SA5.2, Part B standards) and to make decisions to provide a spell or access to water as considered appropriate to minimize the risk to the welfare of livestock, particularly for vulnerable categories such as weak livestock or lactating livestock.

The responsibility for livestock water management begins with the consignor during preparation for transport. Communication of times when water has been provided is an
important management issue at all times, especially for long-distance transport when records of water provision times must accompany the livestock for journeys reasonably expected to exceed 24 hours (SA1.2). Documentation of water provision is only required for journeys over 24 hours, but is a recommended guideline for all journeys.

**Submissions**

**SA5.1.** RSPCA Vic have difficulty with the final phrase “before starting another journey”, in relation to the provision of food, water and rest and recommend that it be deleted. This is an issue that has been discussed in-depth in relation to the guarantee of reasonable outcomes for livestock after delivery. The standard underpins the notion of a mandatory spell between journeys. Overall, it is regarded by the Reference Group as a non issue as livestock delivered from a long journey approaching maximum deprivation times will in most cases be fed, watered and rested as required by common sense, various model codes, industry standards and prevention of cruelty legislation. The latter regulatory mechanism provides sufficient remedy for any cases of abuse. A number of guidelines give recommendations for post delivery feed and water, transfer of responsibilities and remedial actions. The request is not recommended.

SA5.1 If the maximum permitted time off water is reached, livestock must be provided with water, food and rest **before starting another journey.**

SA5.2 DAFWA believes that this standard is not verifiable and recommends that it be a guideline. LTA WA support this and also point out that many saleyards in WA do not have adequate watering facilities. RSPCA Vic request a definition of “longer” – there has been reluctance by the Reference Group to do this and the following clarification is offered. RSPCA Vic also request clear definition of “assessed fitness” and it is unlikely that this term can be improved. The assessment of fitness is a subjective judgement requiring experience that is not amenable to the development of meaningful, prescriptive livestock welfare indicators. A Angel’s request that further prescriptive definition is given to all aspects of this standard including hot temperature to be above 35 degrees.

SA5.2 Time off water must be managed to minimise risk to the welfare of the livestock according to:

i) the increased risk to livestock welfare of longer journeys up close to the permitted maximum time off water

ii) assessed fitness of the livestock for the remainder of the intended journey

iii) predicted climatic conditions, especially heat or cold

iv) class of livestock, especially if weak, pregnant, recently having given birth, lactating or immature

v) nature of the intended journey.

**Time off water limits**

AA, LOBSA SA, AACT, CIWF, AL Qld, A Angels, HAW generally believes that the maximum times permitted are too long. AACT believe that they should be halved. STAC believes that no livestock transport journey should exceed 500 kilometres or 8 hours, particularly to feedlot, slaughter or export. STAC believe livestock must not be transported across jurisdictional borders. RSPCA Australia wish to see a return to the ‘normal’ and
‘extended’ times concept with the conversion of guidelines such as GB4.1 into standards for the ‘extended’ times. PACAT recommend extensive changes on the basis that the current proposal is not ‘evidence based’ but they do not offer any scientific evidence themselves. Some of these suggestions could be accommodated as guidelines. The time off water standards are the first standards that appear in each species chapter.

Alpacas

Buffalo. A Angels believes that the maximum time off water for adult buffalo should be 28 hours and for all others – 18 hours. PACAT believes that the maximum time off water for adult buffalo should be 24 hours and for all other categories 12 hours. This is supported by M Swart in the context of best practice.

Camels. RS SA propose that the maximum time off water for camels over 6 months old is increased to 48 hours in line with cattle, sheep and goats, and that additional categories are recognised as follows in SB3.1. A change consistent with cattle is recommended.

<table>
<thead>
<tr>
<th>Class</th>
<th>Maximum time off water (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Camels over 6 months old</td>
<td>24 48</td>
</tr>
<tr>
<td>Calves 1–6 months old</td>
<td>48</td>
</tr>
<tr>
<td>Lactating cows with calves at foot</td>
<td>24</td>
</tr>
<tr>
<td>Camels known to be more than 9 months pregnant excluding the last 4 weeks</td>
<td>24</td>
</tr>
</tbody>
</table>

PACAT propose a reduction for camels (known to be) more than 9 months pregnant excluding the last 4 weeks from 24 to 12 hours and the inclusion of ‘camels with calf at foot’ – a modification to guideline GB3.4 is recommended. A Angels believe the limit for pregnant camels should be 18 hours.

GB3.4 Camels in the third trimester of pregnancy, lactating camels with calves at foot, and calves under 6 months old should not be deprived of water for more than 12 hours and they should be spelled for 12 hours before starting another journey.

Cattle. AA, PACAT believes that the maximum time off water for adult cattle (SB4.1) should be 24 hours and for all other categories AA-12 hours, bobby calves – 2 hours, PACAT as shown below. A Angels believe that there is a lack of scientific studies to support the 48 hour limit and suggest 28 / 10 / 4 hour limits.

<table>
<thead>
<tr>
<th>Class</th>
<th>Maximum time off water (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cattle over 6 months old</td>
<td>48 24</td>
</tr>
<tr>
<td>Calves 1–6 months old</td>
<td>24 6</td>
</tr>
<tr>
<td>Lactating cows with calves at foot</td>
<td>24 12</td>
</tr>
<tr>
<td>Calves 5–30 days old travelling without mothers</td>
<td>48 2</td>
</tr>
<tr>
<td>Cattle known to be more than 6 months pregnant excluding the last 4 weeks</td>
<td>24 12</td>
</tr>
</tbody>
</table>
AL Qld supports a reduction from 48 to 38, and for the rest to 18 hours, AL SA recommend 24-18-12 hours, except bobby calves.

**Deer.** RSPCA Australia recommends that the SB5.1 limits be 24/20 hours and PACAT 24/12 hours, AL Qld 32/18 hours, A Angels 18/8 hours.

**Goats.** PACAT recommends that the SB5.1 limits be 24/12 hours and believe that there should be a standard for the last 4 weeks of pregnancy – this has not been done because of the relatively short gestation. A Angels propose 28/12 hours and are also concerned about transport of pregnant goats which they believe should be transported if in the last 4 weeks of pregnancy. AL Qld recommends that goat limits are reduced by 10 hours.

**Horses.** A Angels propose 18/12 hours and also propose a new category of foal between 2-6 months old with a new limit of 6 hours. They recommend that foals less than 2 weeks old are not transported. A Angels also believe the limit in SB8.2 should be 28 hours. RSPCA Australia recommends that the SB8.1 limits for lactating and pregnant mares be returned to 8 hours (from 12). They question whether SB8.2 only applies to adult horses; the current words mean all horses. Horse SA recommends that all limits are too high. AL Qld recommend that the limit for foals < 6months old is 8 hours and mares in last 4 weeks of pregnancy is 2 hours with a veterinary certificate.

**Pigs.** AA believe that the maximum time off water for adult pigs (SB9.1 & 9.2) should be 16 hours and 24 hours if water is provided on the vehicle. A Angels recommend 12/8 hours. RSPCA Australia request that ‘short distances’ in GB9.2 be defined. AL Qld recommend that the limits are reduced to 18/10 hours respectively, AL SA 16/12, extended to 24 hours if given continuous access to water.

**Poultry.** A Angels recommend 12/24 hours.

**Sheep.** AA believes that the maximum time off water for adult sheep (SB11.1) should be 24 hours and 18 hours for lambs and pregnant ewes. A Angels believe that there is a lack of scientific studies to support the 48 hour limit and suggest 28/10 hours and a new category for lambs between 10 days and 6 months old. DPI Vic suggests a lower limit for lambs and that the age should be higher at 8-10 months. PACAT recommends that the SB5.1 limits be 24/12 hours and believe that there should be a standard for the last 4 weeks of pregnancy. AL Qld recommends a 38/18 hours regime, AL SA 28/24 hours.

AA recommends RIS option E2 but notes that this option does not reflect AA recommendations for time off water limits.

Changes to any of these standards may require appropriate changes to the mandatory spelling standards.

**Contingency extension to time off water**

AMIC, SCA, AgForce Sheep and Wool, NSW FA, VFF, TFGA recommends that the guidelines (GA5.46, GB7.11, & GB11.7) be converted to a standard(s) for relevant species to give greater certainty under the law for livestock transporters. DPI Vic, RSPCA Australia, RSPCA Vic does not support these guidelines. AA, AL SA reject the notion of GB11.7 to facilitate a contingency extension of time off water during cold weather.
conditions for sheep transport and suggest that this should be replaced by adequate alternative contingency planning for such events. No proposals are recommended on the basis of previous Reference Group discussions.

SCA, MLA proposes that GA5.29 be modified to better recognise this issue:

| GA5.29 | During cold weather, care should be taken to avoid cold stress and windchill, particularly for recently shorn sheep and goats, and weaner pigs, lambs, poultry and calves. This might include providing cover for the vehicle, enclosing the front of the vehicle, providing food before loading, avoiding colder weather or avoiding loading wet livestock or stopping the vehicle to reduce the wind chill factor.

Curfews. Curfews are not dealt with specifically by the standards but are subject to the water and feed provisions that are proposed. A Angels believe that insufficient attention has been given to this practice which they do not support and that feed and water should be provided before loading. There is an opportunity for additional guidelines to be developed.

Action

No changes to the time of water standards or contingency arrangements were proposed during public consultation except for camels, and this was agreed by the majority of the Reference Group. Subsequent to the Reference Group meetings the time off water limits for lactating deer, goats and sheep were questioned. Late communications were conducted to address an omission for deer, rather than to defer this issue to a future date and process. Lactating deer are a much higher risk than lactating goats or sheep. Lactating sheep and goats have a time off water limit of 28 hours applied through the limitation on the young of the species, whether weaned or not, no further changes were made to the document.

---Clarifications are proposed to SA5.2, the definitions and a correction to RIS case example two and some guidelines.

| SA5.2 | Time off water must be managed to minimise risk to the welfare of the livestock according to:

i) the increased risk to livestock welfare of longer journeys up close to the permitted maximum time off water

ii) assessed fitness of the livestock for the remainder of the intended journey

iii) predicted climatic conditions, especially heat or cold

iv) class of livestock, especially if weak, pregnant, recently having given birth, lactating or immature

v) nature of the intended journey.

A change is proposed for camels to bring them into line with cattle, goats and sheep. Whilst there are a number of differing opinions on the limits across the species, no convincing evidence is provided that the limits should be revised.

The guidelines are probably more relevant to non-commercial transport of some species and these are shown below with the recommended changes.
Alternative recommendations are recognised in guidelines as proposed below – there are already a number in place.

**General** – GA4.6, GA5.35 - GA5.40, GA5.46

**Alpacas** – GB1.1, GB1.7, GB1.8

**Buffalo** – GB2.1, GB2.4, GB2.5

**Camels** – GB3.4, GB3.5 in place. The following changes proposed to rectify an omission.

**SB3.1** Time off water must not exceed the time periods given below:

<table>
<thead>
<tr>
<th>Class</th>
<th>Maximum time off water (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Camels over 6 months old</td>
<td>48</td>
</tr>
<tr>
<td>Calves 1–6 months old</td>
<td>24</td>
</tr>
<tr>
<td>Lactating cows with calves at foot</td>
<td>24</td>
</tr>
<tr>
<td>Camels known to be more than 9 months pregnant excluding the last 4 weeks</td>
<td>24</td>
</tr>
</tbody>
</table>

**GB3.4** Camels in the third trimester of pregnancy, lactating camels with calves at foot, and calves under 6 months old should not be deprived of water for more than 12 hours and they should be spelled for 12 hours before starting another journey.

**Cattle** – GB4.1, GB4.3, GB4.6, GB4.7, GB4.9

**Deer** – GB5.1, GB5.5, GB5.6, GB5.7. The DIAA recommend that lactating deer are only transported where there is a welfare need and for the shortest duration possible as recommended in GB5.5.

**SB5.3** Deer known to be in the last 4 weeks of pregnancy and lactating deer with calves must only be transported under veterinary advice unless the journey is less than 4 hours duration.

**Ratites**

The following guideline is required for birds to cover an omission:

**GB6.2** Additional considerations for bird welfare should be made for long duration distance travel:

- for birds after 424 hours off water
- for chicks or young birds 5 to 90 days after 18 hours off water

These considerations should include:

i) that the birds are fit for the remainder of the intended journey
ii) adverse hot weather conditions are not prevailing or predicted

iii) a longer spell time at the end of the journey

iv) the recent management of the birds before first loading.

**Goats** – GB7.1, GB7.5, GB7.6, GB7.9, GB7.10, GB7.11

**Horses** – GB8.1, GB8.3, GB8.4, GB8.8

**Pigs** – GB9.2, GB9.3

The following guideline is required for pigs to cover an omission:

GB9.45 Additional considerations for pig welfare should be made for long duration distance travel: (numbers provided by APL)

- for pigs after 12 hours off water
- for lactating sows, piglets and weaners after 8 hours off water
- for pregnant sows after 8 hours off water

These considerations should include:

i) that the pigs are fit for the remainder of the intended journey

ii) adverse hot weather conditions are not prevailing or predicted

iii) a longer spell time at the end of the journey

iv) the recent management of the pigs before first loading.

**Poultry** – GB10.5, GB10.7

The following guideline is required for birds to cover an omission (numbers provided by ACMF):

GB10.5 Additional considerations for bird welfare should be made for long duration distance travel:

- for breeder birds, pullets and layer hens after 42 20 hours off water
- for broilers after 15 hours off water
- for chicks after 30 36 hours from take off

These considerations should include:

i) that the birds are fit for the remainder of the intended journey
ii) adverse hot or cold weather conditions are not prevailing or predicted

iii) a longer spell time at the end of the journey

iv) the recent management of the birds before first loading.

**Sheep – GB11.1, GB11.4, GB11.5, GB11.7**

Definitions:

<table>
<thead>
<tr>
<th>Access to Water</th>
<th>A reasonable opportunity for livestock to be able to drink water of a suitable quality and quantity to maintain their hydration.</th>
<th>Deletion of ‘reasonable’ requested by RSPCA Australia but denied by majority of the Reference Group</th>
</tr>
</thead>
</table>

**Journey**

The movement of livestock from loading to unloading at a final destination or at the point where maximum time off water has been reached.

“Where the term ‘longer journey’ is used, this refers to journeys in excess of water deprivation times as specified in the species guidelines where mention is made of additional requirements for long distance travel.”

Retain original definition

**Journey Time**

The time that animals are loaded in a container or on a vehicle, until they are unloaded

**Time off Water**

When water is not reasonably accessible for livestock. Equivalent to water deprivation time. Time off water is cumulative from the last time the animals were provided with water. First livestock handling or curfew, unless livestock are given reasonable access to water. During the transport process, this minimum reasonable access period is four hours

Reasonable access to water on a property is a management decision. During transport livestock are faced with unfamiliar circumstances and other stressors that may deny them an opportunity to drink.
<table>
<thead>
<tr>
<th>Water deprivation time</th>
<th>The total time animals are deprived of water, including during mustering away from water, yarding and water curfew time before transport, loading, time on the vehicle whether moving or stationary unless reasonable access to water is provided, and time during unloading and holding at the destination until reasonable access to water is provided. Where a voluntary spell exceeds four hours, the time that water is provided to livestock during the spell can be used to extend the total time of the trip within the permitted maximum time off water if the livestock meet the fitness requirements. See Time off water.</th>
<th>Clarification using the notion of the ‘clock stops’ and avoiding any mathematical terms.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case Example two p30</td>
<td>A corrected example has been circulated showing a 29.7 hour mid journey spell with food (no curfew) allowing the journey to be completed in compliance with the standards. The RIS will be amended. LTS definitions have been clarified.</td>
<td>Mid-journey spells enable the water deprivation time clock to stop; there is no deduction from the time off water. A spell in excess of 24 hours with food allows a new journey to take place.</td>
</tr>
<tr>
<td>Chapter 5 Heading change guidelines above GA5.34</td>
<td>Feed, water, rest, stops and spells during or after the journey</td>
<td>To better reflect these important subjects.</td>
</tr>
</tbody>
</table>

The following minor changes are also proposed:

**GA5.29** During cold weather, care should be taken to avoid cold stress and windchill, particularly for recently shorn sheep and goats, and weaner pigs, lambs, poultry and calves. This might include providing cover for the vehicle, enclosing the front of the vehicle, providing food before loading, avoiding colder weather and avoiding loading wet livestock, or stopping the vehicle, to reduce the wind chill-factor.

The phrases ‘hours time off water’ and ‘hours off water’ mean the same and preference will be given to the use of the shorter phrase ‘hours off water’ where appropriate. There are a number of guidelines where this minor change will take place.
Spelling arrangements - mandatory, voluntary, pre-transport & mid-journey temporary destinations

Background
The proposed mechanism within the overall duty of care responsibilities, livestock can travel for a time period up to the limits for time off water specified in the species chapters of Part B, and then they must be given a mandatory spell with sufficient space to all lie down, access to water and food, before starting a further journey. This spell is usually performed off a vehicle but may be performed on a stationary vehicle if provisions are met. Where animals are unloaded, a spell starts from the time all animals are unloaded and ends when animals are handled for reloading. The time off water / mandatory spell relationship is not linear or meant to be applied as a pro-rata standard. As long as livestock are assessed to be fit, they can be travelled / deprived of water up to the maximum permitted time, before the mandatory spell is required. Voluntary spell arrangements allow some flexibility in managing the total time taken for a journey within the permitted maximum time off water.

Table 2: The revised relationship between maximum permitted time off water and mandatory spell time

<table>
<thead>
<tr>
<th>Maximum permitted time off water (hours)</th>
<th>Mandatory spell time (hours)</th>
<th>Relevant species.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 12</td>
<td>nil</td>
<td>all</td>
</tr>
<tr>
<td>12</td>
<td>12</td>
<td>Horse, pig</td>
</tr>
<tr>
<td>24</td>
<td>12</td>
<td>All except poultry</td>
</tr>
<tr>
<td>28</td>
<td>12</td>
<td>Deer, goat, sheep</td>
</tr>
<tr>
<td>36</td>
<td>24</td>
<td>Alpaca, buffalo</td>
</tr>
<tr>
<td>48</td>
<td>36</td>
<td>Cattle, deer, goats, sheep and camels</td>
</tr>
</tbody>
</table>

The mandatory spell length is defined by Part B standards for each species. There are no mandatory spells for water deprivation periods of less than 12 hours. Spelling after journeys of up to 12 hours time off water is only required for defined special categories of horse and pig, based on age, lactation status and pregnancy status. Bobby calves and poultry generally do not travel longer than 24 hours and on this basis do not have a mandatory spell requirement defined as they are not expected to travel further. A 24 hour spell with all elements, allows a new journey to commence.

The species that can be transported for long trips with special provisions including water and food access and additional space include; alpacas (72 hours), camels (72), horses (36) and pigs (48). Space allowance must be made for all young stock travelling with their mothers, so that the animals have space to lie down. All other species are off loaded when a spell is required, which is usually at the end of a journey.
A voluntary spell may occur before loading, mid-journey or at the completion of a journey. During a voluntary spell, water and space to lie down must be provided to all livestock, on a stationary vehicle or off a vehicle. Food and shelter may also be provided.

Unloading en-route can be counterproductive to livestock welfare, due to the extra handling, unfamiliar surroundings and new social interactions between livestock. To mitigate this potentially adverse effect, four hours is proposed as the minimum time for an in-transit spell to be recognized for the purposes of extending the time of a transport process. This minimum time is considered necessary to permit livestock to drink and rest in unfamiliar surroundings. In-transit spells longer than four hours can be used to extend the total time of the journey to permit completion of a journey within the total, cumulative, time off water limit as defined by the standards (‘the clock stops during an eligible spell’). After a spell time of 24 hours, a new period of water deprivation (journey) can commence as long as food has been provided (the ‘clock’ is restarted).

A spell less than four hours duration is not recommended or recognised in water deprivation time calculations for any species, but can be undertaken if necessary. A voluntary mid-journey spell of over four hours is an important planning and contingency strategy for long duration transport.

Pre-transport spells are not mandated except for horses (SB8.5) but the general consideration arises in the context of managing total time off water and the fitness of all categories of livestock, particularly livestock that are weak, pregnant, lactating, immature or that have recently given birth (SA5.2iv).

During a driver rest stop, where the vehicle is stationary and animals usually remain on the vehicle, livestock are inspected on the vehicle but this time is not recognized as a spell or rest for livestock, unless the spell requirements are met which are; the minimum four hour time period, undisturbed access to water and space to all lie down.

A curfew is when livestock are purposefully denied access to feed and/or water. No standards for curfews are specified. Curfews are sometimes important for livestock welfare during transport to prevent soiling and slippery conditions, as indicated in the species guidelines. Time spent in curfew in yards when water is not provided, does not count as a spell. The standards for the outer limits of water provision may over-rule a decision to curfew.

Submissions

A Angels believe that there is a general lack of spelling facilities in Australia and that it is difficult for transporters to spell livestock on long journeys for better management or in emergencies. The Nullarbor crossing is an example of this deficiency. They call for more spelling facilities to be developed to follow the EU and NZ approaches to transport.

SA5.1

Proposed by RSPCA Australia as a clarification consistent with the intention.

| SA5.1 | If the maximum permitted time off water is reached, livestock must be provided with water, food and rest before continuing the current journey or starting another journey. |
**Mandatory spell**

AMIC propose that where a standard requires a spell (after maximum time off water is reached) that this is stated to be a mandatory spell to remove confusion with the voluntary spell option. AMIC notes correctly that mandatory spells represent feed deprivation times unless there are higher standards for provision of feed.

WPA, ALFA, AgForce Sheep and Wool, VFF, LTA WA believe that the 36 hours mandatory spell after 48 hours time off water is not warranted for sheep and cattle and should be deleted to rely upon a 24 hours mandatory spell. The 36 hours spell after 48 hours TOW is recommended to become a guideline. WPA point out that the research (MLA AHW055) shows that sheep had recovered most metabolic indicators by 24 hours, but were not tested with a subsequent journey. A requirement for 36 hours spell affects only an extremely small proportion of potential sheep, cattle and goat journeys and complicates the spelling arrangements that allow a new journey to commence after a 24 hours spell with feed and water (‘24 hour rule’). ALFA, RSPCA Australia suggests that the 24 hour rule is in conflict with the 36 hours mandatory spell requirement after 48 hours TOW.

The following proposals are made to the relevant parts of the standards:

- **SB4.2** If cattle over 6 months old have been off water for 48 hours, they must **have a mandatory spell** for 36 24 hours before starting another journey.
- **SB7.2** If goats over 6 months old have been off water for 48 hours, they must **have a mandatory spell** for 36 24 hours before starting another journey.
- **SB11.2** If sheep over 4 months old have been off water for 48 hours, they must **have a mandatory spell** for 36 24 hours before starting another journey.

Inclusion of ‘have a mandatory spell’ elsewhere as relevant.

New guidelines are proposed by AHA:

- **GB4.X** “A spell period of 36 hours should be undertaken before commencing or continuing a journey if cattle have been off water for 48 hours and transported for a long distance **duration**”.
- **GB7.X** “A spell period of 36 hours should be undertaken before commencing or continuing a journey if goats have been off water for 48 hours and transported for a long distance **duration**”.
- **GB11.X** “A spell period of 36 hours should be undertaken before commencing or continuing a journey if sheep have been off water for 48 hours and transported for a long distance **duration**”.

AL SA wish to see a standard for feeding of cattle and sheep (GB11.3) prior to transport based on the relevant guidelines. A Angels support the current arrangements but they wish to see enforceable mid-journey mandatory spells similar to the EU situation. They recommend that this is achieved through shorter maximum time off water limits for all categories and the same proposed length of spell. This recommendation is not repeated in
each species chapter unless there is a viable argument for reducing the limits as discussed in the previous section on time off water limits.

RS SA has put forward a reasonable case for increasing the time off water for camels that will also require revision of SB3.3 as follows:

**SB3.3** If camels over 6 months old have been off water for 48 hours, they must be spelled for 24 hours (4) before starting another journey.

If camels over 6 months old or camels known to be more than 9 months pregnant, excluding the last 4 weeks, or lactating cows with calves at foot, or calves 1-6 months old, have been off water for 24 hours, they must be spelled for 12 hours before starting another journey.

**Voluntary spell**

RSPCA Australia, AVA requests that a scientific basis be provided for the 4 hour rule that permits an extension of the transport process and also suggest that the 24 hour rule is in conflict with the 36 hour mandatory spell after 48 hours TOW. Four hours was chosen as a reasonable compromise for an opportunity for livestock to rest and drink in unfamiliar surroundings at some mid stage of a journey. Australian sheep and cattle research supports this finding. The ‘24 hour rule’ which permits the recommencement of a new journey if the livestock are fit for the intended journey maybe at times in conflict with the 36 hours mandatory spell requirement, but it is predicted that this will be an infrequent issue. In any case, at all times, transporters are bound by a duty of care to manage livestock appropriately and to minimise the risk to their welfare. A short synopsis will be provided in the revised RIS.

SCA are concerned that the longer voluntary spell periods examined in Options E and E1 of the RIS will prolong the transport process and may be counter-productive to livestock welfare. These options are not currently supported. In support of this CSIRO report;” For journeys between 24 – 36 hours, the available evidence would indicate that the benefits of mid-transport rest periods are of negligible value in terms of animal welfare. There is more value in ensuring the journey is completed in the shortest time possible. There is a knowledge gap in terms of the relative animal welfare benefits of unloading and resting sheep and cattle for periods (and the duration of such periods) compared with transportation for 36 to 48 hours.

AL SA recommends that GA5.39 and GA5.42 are developed into standards:

**GA5.39** Water should be easily accessible to all livestock and livestock should be able to drink with normal posture.

**SA5.X** “Water must be available to livestock to be able to drink in a normal posture.”

It is felt that this proposal is not necessary and that standards and definitions that mandate the supply of water and time off water limits are already adequate to guarantee a reasonable opportunity to drink.
SA5.X “Drivers must ensure that unloaded livestock have access to water if not able to
transfer responsibility for livestock welfare.”

It is felt that this proposal is also not necessary and that standards and definitions that
mandate the supply of water and time off water limits and responsibilities of the ‘person in
charge’ are already adequate to guarantee access to water after unloading. This situation
presents similar difficulties to the determination of responsibilities at loading. The
responsibilities at unloading are dependent on circumstances directed by delivery
instructions. It is recommended that the guidelines remain.

Mid-journey temporary destinations
This is a particular issue where the initial stage in a journey is less than 24 hours long and
the current standards do not require documentation or communication of livestock access to
water information as required by SA1.2. QDPI recommend that there is a standard that
covers saleyards, spelling facilities and staging points where the responsibility for the
management of the livestock changes. NSW DPI recommends that any animals held in
yards for over 24 hours be provided with feed and water. RSPCA Australia, AACT believes
that this is an issue that requires a remedy. DPI Vic, RSPCA Vic supports the mandatory
provision of water in saleyards. APL believe such a standard is ‘out of scope’ of this
process.

The QDPI proposal is:

SA5.X “Where livestock arrive at a saleyard, spelling facility or staging point they
must be provided with reasonable access to feed and water, unless the details of
last access to feed and water and the final journey details are known, and the
livestock can be reasonably delivered in a fit state within the maximum water
deprivation times.”

This proposed standard attempts to further address the issue of the provision of feed and
water through the chain of responsibility where feed and water provision information is
often lacking. This proposed standard will require a greater proportion of livestock arriving
at yards to be watered and fed. This may require additional handling and some yards may
have to provide additional water facilities, and these issues would be required to be
addressed in the revised RIS.

An alternative proposal incorporating the NSW DPI suggestion, more consistent with the
QDPI intention and existing industry species and saleyards codes is recommended by AHA.
The clause in brackets is suggested to be redundant in the context of the requirements of
agreed standards for time off water and fitness for transport.

SA5.X “Livestock at a saleyard, spelling facility or staging point must be provided
with reasonable access to feed and water after 24 hours at the facility, unless
the details of last access to feed and water and the final journey details are
known, (and the livestock can be reasonably delivered according to livestock
welfare requirements).”

A subsequent guidelines proposal could be:

GA5.X Livestock at a saleyard, spelling facility or staging point should be provided
with reasonable access to feed and water after 12 hours at the facility.

**Pre-transport spelling**

CCA support current arrangements with no mandatory requirement. RSPCA Qld would like to see more guidelines for curfews but have not proposed any. RSPCA Australia, AVA proposes the following standard from a previous guideline (now GB4.6 proposed) they do not support the transport of these categories of livestock unless it is in the best welfare interests of the livestock. The proposal to be effective requires definition of the proposed periods. The proposal for a standard is not further recommended on the basis of existing standards and guidelines and previous Reference Group discussions:

**SB4.X** Pre-transport spell (water and rest) periods **should must** be provided for the following classes of livestock, excluding poultry, where there is long and difficult mustering or if the travel time is expected to be of a long duration and approaching the maximum water deprivation time for the livestock category:

- livestock that are pregnant, have recently given birth, are lactating or with young at foot
- immature livestock as defined for each species
- livestock mustered from extensive areas or that are unaccustomed to handling
- livestock that are stressed or fatigued from mustering or handling
- weak livestock.

**Post Transport**

AMIC recommend that all post journey species food and water guidelines be changed to the GB9.4 words shown.

**GB4.8** Cattle should be fed and watered as soon as possible after unloading.

**GB9.5** Upon unloading, pigs should be fed and watered within 24 hour intervals in accordance with the relevant standards for production, saleyard and processing sectors.

This could become relevant for all species except poultry, and even though only guidelines, is not supported as it is inconsistent with the intent of previous Reference Group discussions.

**Actions**

The following proposals are recommended and agreed by the majority of the Reference Group. No changes are recommended to the underlying mechanism of spelling arrangements.

**SA5.1** If the maximum permitted time off water is reached, livestock must be provided with water, food and rest before continuing the current journey or starting another journey.

**SA5.3** If no documentation is provided indicating the last time the livestock had access to water, livestock at a saleyard, spelling facility or staging point must
be provided with reasonable access to feed and water after 24 hours at the facility unless the details of last access to feed and water and the final journey details are known.

GA5.43 “Livestock at a saleyard, spelling facility or staging point should be provided with reasonable access to feed and water after 12 hours and feed after 36 hours at hours at the facility.

The following proposals are made to the relevant parts of the standards:

SB3.3 If camels over, under 6 months old have been off water for 48 hours, they must have a mandatory spell for 24, 36 hours before starting another journey.

If camels over 6 months old or camels known to be more than 9 months pregnant, excluding the last 4 weeks, or lactating cows with calves at foot, or calves 1-6 months old, have been off water for 24 hours, they must be have a mandatory spelled for 12 hours before starting another journey.

SB4.2 If cattle over 6 months old have been off water for 48 hours, they must be have a mandatory spelled for 36 hours before starting another journey.

SB7.2 If goats over 6 months old have been off water for 48 hours, they must have a mandatory be spelled for 36 hours before starting another journey.

SB11.2 If sheep over 4 months old have been off water for 48 hours, they must have a mandatory spell for 36 hours before starting another journey.

Inclusion of ‘have a mandatory spell” elsewhere as relevant in mandatory spelling standards and definitions (alpacas, buffalo, deer, ratites and pigs)

New guidelines are proposed but were not supported by the majority of the Reference Group in view of the agreed 36 hours mandatory spell:

GB4.X “A spell period of 36 hours should be undertaken before commencing or continuing a journey if cattle have been off water for 48 hours and transported for a long distance”.

GB7.X “A spell period of 36 hours should be undertaken before commencing or continuing a journey if goats have been off water for 48 hours and transported for a long distance”.

GB11.X “A spell period of 36 hours should be undertaken before commencing or continuing a journey if sheep have been off water for 48 hours and transported for a long distance”.

- The agreed extension of camel time off water extension to 48 hours has made the following proposal redundant or it is now covered by SB3.3

GB3.X “A spell period of 36 hours should be undertaken before commencing or continuing a journey if camels have been off water for 48 hours and transported for a long distance”.

Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock - Public Consultation Response Action Plan
Replacement GA4.6 proposed, see further discussion below in this section.

**GA4.56** Pre-transport spell (water and rest) periods should be provided for the following classes of livestock, excluding poultry, where there is long and difficult mustering or if the travel time is expected to be of a long duration and approaching the maximum water deprivation time for the livestock category:

- livestock that are pregnant, have recently given birth, are lactating or with young at foot
- immature livestock as defined for each species
- livestock mustered from extensive areas or that are unaccustomed to handling
- livestock that are stressed or fatigued from mustering or handling
- weak livestock.

The following clarifications to the definitions are proposed:

<table>
<thead>
<tr>
<th>Spell — Mandatory</th>
<th>Spell — Voluntary</th>
</tr>
</thead>
<tbody>
<tr>
<td>A spell is a mandatory requirement when maximum time off water is reached before starting a further journey, as defined by standards for each species. A mandatory spell is where a standard requires an animal to be spelled. Water, food and space to lie down must be provided to all livestock, on a stationary vehicle or off a vehicle. Handling of animals should be kept to a minimum, are not handled in this time. Shade and shelter may also be provided. Where animals are unloaded, a spell starts from the time all animals are unloaded and ends when animals are handled for reloading. A spell does not include time spent in curfew.</td>
<td></td>
</tr>
</tbody>
</table>

Clarity: Clarification, excludes preloading and end of journey (mandatory) spells

RSPCA Australia question the scientific base.
The time used for spells of longer than 4 hours during the journey will not be included in the calculation of the total time off water. A spell less than 4 hours duration is not recommended or recognised for water deprivation time calculation, but can be undertaken as necessary. Where livestock are voluntarily spelled for 36-24 hours with access to food, any subsequent journey can be considered as a new water deprivation period. Handling of animals should be kept to a minimum.

A spell does not include time spent in curfew. Clarification, the spell now includes rest, water and food to be eligible to start another journey. Mandatory spells include all these elements.

| rest period or rest stop | A driver rest stop, where the vehicle is stationary and animals usually remain on the vehicle without access to water or food. Livestock are inspected on the vehicle but it is not recognised as a spell for livestock. | clarification |

It is intended to remove the following sentences from the note below the species standards for; alpaca, camel, deer, ratites, and pigs, as the statements are incorrect and the revised standards and definitions are now adequate.

‘However, spells longer than 4 hours can be deducted from the total water deprivation time. A spell less than 4 hours is not recommended or recognised for water deprivation time calculation, but can be taken as necessary.’

The following minor changes are proposed:

WPA, SCA, AgForce Sheep and Wool propose that GA4.6 be removed, as was agreed at SRG6 (spelling paper). This guideline was created from the old SA4.4 (below) that was agreed to be deleted.

Old SA4.4 ‘Access to water must be provided by the livestock consignor before loading, if the total permitted time off-water is reasonably expected to be reached during the intended journey’.

It has been realised that the incorrect guideline was deleted post-SRG6 and it is proposed to delete GA4.6 and recreate GA4.8 as it was known then (in the version that is on the Global Learning website) in its place. To summarise, GA4.8 was proposed to be a standard in the Option A supported, but SRG6 agreed to keep it as a guideline only.

See also GA5.13 which discusses more general transport arrangements for livestock that may be at risk.
is reasonably expected to be reached during the intended journey and if this is an option to address the provision of water in the transport process.

Pre-transport spell (water and rest) periods should be provided for the following classes of livestock, excluding poultry, where there is long and difficult mustering or if the travel time is expected to be of a long duration and approaching the maximum water deprivation time for the livestock category:

- livestock that are pregnant, have recently given birth, are lactating or with young at foot
- immature livestock as defined for each species
- livestock mustered from extensive areas or that are unaccustomed to handling
- livestock that are stressed or fatigued from mustering or handling
- weak livestock.

Note

Water and feed curfews can be an important part of livestock management for transport, depending on the species and pasture conditions. Issues include faecal and urine contamination of livestock, vehicles and roads, and slipping and falling of livestock in wet livestock crates. Water curfews must be managed in the context of the total time off water.

GA5.374

During a voluntary spell, in addition to water and space to lie down, livestock should be provided with the following additional provisions:

- access to appropriate food if there is time to eat and rehydrate the spell is greater than 12 hours
- enough space for exercise
- separation appropriate to the travel group.

Note (GA5.40)

A spell is a rest period for livestock and is a mandatory requirement when maximum water deprivation times are reached before starting a further journey. The terms ‘spell’ and ‘mandatory spell’ are further defined in the definitions. Each species has requirements for spelling, included in Part

and Wool propose that GA4.6 be removed.

AHA proposes recreation of the incorrectly deleted guideline.
B. During a voluntary spell at any other time, livestock must be unloaded, allowed access to water and space to lie down, if this is not able to be provided on the vehicle. Feeding is not recommended during short spells of less than 12 hours. Livestock must be inspected for fitness for the remainder of the intended journey before reloading.

Driver rest stops are different from spells. During a driver rest stop, livestock are generally not unloaded. No water provision time credit is given for a driver rest stop. Livestock are inspected on the vehicle. Weather conditions during any stop or spell can have an important impact on livestock welfare.

SA5.3 Loading density & segregation

Background

Loading density is a livestock welfare concern. The main risk is overloading which may lead to animals going down and not being able to get up, heat stress and bruising. Light loading can be an issue in some circumstances. There are many factors that govern the determination of an appropriate loading density as defined in SA5.3. These variable factors make it difficult to pre-determine a meaningful, prescriptive maximum loading density standards.

The data contained in the MCOP has been converted into guidelines rather than standards. SA5.3 relating to loading density is a general Standard. There have been requests for more prescriptive standards.

The material in the transport MCOP’s for cattle, sheep draft, pigs, poultry and horses and other sources for the other species, was considered by most in the Reference Group to be best used as a guideline. Consignors and drivers are best placed to determine the most appropriate loading densities for any given journey. Animal cruelty laws could be used against the person in charge if overloading and consequent cruelty was inflicted on livestock.

Further points to note are; Road Transport Authority maximum axle load weights will have precedence of any recommended livestock loading density and generally act to restrict loading densities. Research to recommend maximum stocking rates for mammals is close to completion but requires validation in practice.

Submissions

The statement used in SA5.3, SA5.5 “to minimise risk to the welfare of the livestock” covers all loading density and segregation issues including: over loading, heat stress, downers, lack of support, etc. AA, CIWF, LOBSA SA, AACT, A Angels believes that there
should be prescriptive standards rather than the general standard SA 5.3 and that all loading density guidelines become standards. DAFWA, LTA WA believes that this standard is not verifiable and recommends that it be a guideline. RSPCA Australia wish to see the loading density data guidelines be converted into standards for all species. RSPCA Victoria further wish to see the relationship with important factors calculated in loading density tables. DPI Vic wish to see more loading density guidelines for common situations. PACAT, AL Qld, A Angels, request inclusion of the words “be able to rise unassisted” as a more meaningful and specific expression of loading density. HAW believes that the recommended loading density is too high to allow adequate livestock inspections. STAC wish to see space for all livestock to lie down at once. The proposal for consideration is:

SA5.43 “Loading density must be assessed for each pen or division in the livestock crate or each container, based on average liveweight of the intended livestock loading, must allow an animal to be able to rise unassisted and must be managed to minimise risk to the welfare of the livestock. A minimum of 5% less animals must be loaded if they have horns. Determination of loading density must consider all of the following factors:

i) species

ii) class

iii) size and body condition

iv) wool or hair length

v) horn status

vi) predicted climatic conditions

vii) nature of the intended journey

viii) design and capacity of the vehicle including ventilation.

Ventilation is considered to be covered by SA3.1. The two minor changes to the dot points are recommended by CCA, MLA and RSPCA Australia, respectively. RSPCA Vic wish to see age specifically mentioned as a factor – this is incorporated in SA5.3 ii) – class, which covers age and sex. A change is recommended for clarity. All of the factors may not be relevant for each journey.

APL, APF recommend that SA5.4 - final say on loading density, is a shared responsibility and that primarily of the consignor. This view is recognised and the role of commercial arrangements is acknowledged.

Other individual species references to this topic in this report are covered in the species sections below.

**SA5.5 Segregation**

DAFWA, LTA WA believes that this general standard is not verifiable and recommends that it be a guideline. A Angels believe that horned and unhorned livestock must be segregated
but this has not been supported by the Reference Group in previous discussions. Specific segregation standards are proposed for some categories in the species sections. No further action proposed.

SA5.65 Livestock must be segregated by sufficient internal partitions to minimise risk to the welfare of other livestock based on:

i) species, class and size
ii) level of fitness
iii) level of aggression
iv) nature of the intended journey
v) Horned and unhorned livestock must be segregated.

Action

The following proposal is recommended and the following amendments were agreed by the majority of the Reference Group:

SA5.43 “Loading density must be assessed for each pen or division in the livestock crate or each container, based on average liveweight of the intended livestock loading, must allow an animal to be able to rise unassisted and must be managed to minimise risk to the welfare of the livestock.

Determination of loading density must consider all of the following factors:

i) species
ii) class
iii) size and body condition
iv) wool or hair length
v) horn status
vi) predicted climatic conditions
vii) nature of the intended journey
viii) design and capacity of the vehicle.

A minor change for SA5.65:

SA5.65 Livestock must be segregated by sufficient internal partitions to minimise risk to the welfare of other livestock, based on:

Determination of segregation must consider all of the following factors:

i) species, class and size
ii) level of fitness

iii) level of aggression

iv) nature of the intended journey.

The word ‘class’ was preferred to ‘age and sex category’.

**SA5.6 Livestock handling, Lifting and dragging**

**Background**

This area of livestock handling has received a lot of attention by Reference Group members and there continues to be a wide divergence of opinions. It is recognised that the handling standards agreed to for livestock transport will have wider application before and after transport.

Lifting off the ground is the issue of concern but it recognised that a more general term is necessary such as; “off a supporting surface” to allow for removal from cages and vehicles. The words ‘by only’ mean that the animal may be supported by other means whilst partly lifted by head, ears, horns, neck, tail, wool, wings or feathers. Lifting by one leg has not been excluded as it is necessary to allow capture and removal of caged layer hens, piglets and other young livestock where this is acceptable in welfare terms. Various exemptions are given to various categories or species for different lifting techniques.

Dragging has not been previously included but it is sometimes necessary to move an animal a short distance this way if there has been some form of accident. It is felt now that there is a need for a standard.

**Submissions**

The following amendments to SA5.6 are proposed by AHA after consulting AWWG members, for further discussion by the Reference Group:

SA5.76 “Livestock must be handled in a manner that is appropriate to the species and class and does not cause pain or injury. Specifically:

i) livestock (excluding poultry) must not be lifted off the ground a supporting surface by only the head, ears, horns, neck, tail, wool, hair or feathers

ii) livestock must not be lifted off the ground a supporting surface by a single leg except in the case of all poultry, and sheep, goats and pigs if they are less than three months old 15 kilograms live weight

iii) Mechanical lifting of livestock must ensure that the livestock is adequately supported

iv) livestock must not be thrown or dropped

v) livestock must not be punched, kicked or struck in an
unreasonable manner by hard or sharp instruments including lengths of metal piping, sticks or belts.

iv) Recumbent livestock must not be dragged, except for the shortest possible distance and in a reasonable manner, to allow safe handling, lifting, treatment or humane destruction.

These changes are proposed because:

i) Weight is the underlying issue and is more verifiable.

ii) New clause to cover mechanical lifting of large stock, a general standard to provide emphasis to this area. Moved to list iii)

iii) It is not the object but the manner in which it is used that is the issue. The standard requires words to state the harmful extent of the action, but the examples are not necessary and not representative of all possibilities.

iv) A new standard that covers dragging with important exemptions for the reasons defined. Recumbent means lying and it does not include dragging animals that are on their feet or rumps which is necessary in normal husbandry procedures.

RSPCA Australia, AACT, PACAT, AL Qld, HAW wish to see no exclusions for lifting of poultry and the lifting by one leg exemption for sheep goats and pigs removed and the inclusion of a standard that prevents dragging by one leg. RSPCA Vic, A Angels is totally opposed to lifting of any category by a single leg. DPI Vic is opposed to lifting of any category by a single leg unless animals are given additional support or alternatively they recommend that animals are younger than 3 months.

**Dragging**

AA wish to see a total prohibition of dragging, including for injured and moribund livestock, unless this can be done humanely and for the best interests of the animal. AA strongly suggest that moribund livestock are destroyed on the vehicle and recommend that this preference is included in a standard. AMIC also recommend that downer livestock must not be dragged whilst sensible. CCA recommend that dragging is covered under a guideline. RSPCA Qld, RSPCA Vic, CIWF, AACT, PACAT, AL Qld, AL SA, A Angels recommends that dragging of all species and ages is banned. AACT, PACAT, AL Qld wish to see inclusion of a standard that prevents dragging by one leg.

DPI Vic proposes that GA5.7 becomes a standard. There is already a lifting standard for poultry SB10.4 i) and SA5.6 iii) “livestock must not be thrown or dropped” and SA5.6 iv) “livestock must not be punched, kicked, or struck” is in place. No change is recommended.

GA5.7 Calves, lambs, small deer, foals, weaner pigs, and weak or injured livestock may be carefully lifted and placed on or off the vehicle if they cannot negotiate loading ramps. Poultry should be lifted with care, either manually or mechanically, and placed in transport containers.

SA5.x “Calves, lambs, small deer, foals, weaner pigs, and weak or injured livestock
may must be carefully lifted and placed on or off the vehicle if they cannot negotiate loading ramps. Poultry should must be lifted with care, either manually or mechanically, and placed in transport containers.”

DPI Vic also proposes a minor change to GA5.5 for completeness.

GA5.65 Livestock should be handled in a manner that minimises stress. Livestock with no room to move should not be forced, prodded, pushed or excessively handled. Where excessive handling effort occurs, facility design should be examined. Excessive yelling, noise making and sudden movements should be avoided.

DPI NSW proposes additions to GA5.9 for completeness.

GA5.109 Handling aids should be used that are suitable for the species and class of livestock being handled. Handling aids should be used with care. Aids for moving livestock may include electric prodders, poly pipes, sticks, flappers, backing boards, rattlers, canes with flags attached, hand, arm or body of the stock handler, and dogs.

Actions
The following proposal is recommended and the following amendments were agreed by the majority of the Reference Group:

SA5.6 “Livestock must be handled in a manner that is appropriate to the species and class and minimises pain or injury does not cause pain or injury. Specifically:

i) livestock (excluding poultry) must not be lifted off the ground a supporting surface by only the head, ears, horns, neck, tail, wool, hair or feathers

ii) livestock must not be lifted off the ground a supporting surface by a single leg except in the case of all poultry, and sheep, goats and pigs if they are less than three months old 15 kilograms live weight

iii) Mechanical lifting of livestock (excluding poultry) must ensure that the livestock is adequately supported or secured as necessary

iv) livestock must not be thrown or dropped

v) livestock must not be struck in an unreasonable manner, punched or kicked or struck in an unreasonable manner by hard or sharp instruments including lengths of metal piping, sticks or belts

vi) Downer Recumbent livestock must not be dragged, except in an emergency to allow for the shortest possible distance and in a reasonable manner, to allow safe handling, lifting, treatment or humane destruction.
The above changes introduce some uncertainty as to what is allowable in assisting an animal to rise or to move a stubborn animal whilst it is on its feet. The proposed definition is now redundant:

Changes to the definition of “Morbid” and “Downer” in the humane destruction section.

Recommended changes to guidelines are:

GA5.6  Livestock should be handled in a manner that minimises stress. Livestock with no room to move should not be forced, prodded, pushed or excessively handled. Where excessive handling effort occurs, facility design should be examined. Excessive yelling, noise making and sudden movements should be avoided.

GA5.10 Handling aids should be used that are suitable for the species and class of livestock being handled. Handling aids should be used with care. Aids for moving livestock may include electric prodders, poly pipes, sticks, flappers, backing boards, rattlers, canes with flags attached, hand, arm or body of the stock handler, and dogs.

SA5.7 Electric prodders

Background
This issue has been discussed comprehensively by the Reference Group. Judicious use of electric prodders as a last resort can be a valuable aide to moving livestock through gateways and races during handling in yards and for loading and unloading for transport. Five of the livestock industries support responsible use. Four of these industries – buffalo, camels, deer and pigs only require limited prodder use to help solve movement issues as a last resort after other reasonable actions have been tried and found unsuccessful in a reasonable time frame. Prodder use on pigs has been considered controversial.

SA 5.7 restricts the use of prodders to livestock over 3 months of age. Each species may then have further standards or guidelines. The species where prodder use is not allowed by the LTS are; alpacas SB1.5, Rattites, SB6.7, horses SB8.12, pigs SB9.4, and poultry SB10.8. Prodder use is not really relevant for ratites and poultry but is mentioned for uniformity. It is noted that this situation is at variance with the OIE Terrestrial Animal Health Code (2007) guidelines in section 3.7.3.8.3 with respect to pigs, goats, sheep and the age recommendation.

For the other species, the current standards and guidelines are:

Buffalo, SB2.4 (“after reasonable actions to cause movement have failed”), GB2.15
Camels, SB3.6 (“after reasonable actions to cause movement have failed”), GB3.14
Cattle - nil

Deer, SB5.4 (“after reasonable actions to cause movement have failed”), GB5.17 (fawns or calves)
Goats GB7.22 ‘Electric prodders should not be used on pregnant goats’.

Sheep – nil.

**Submissions**

Prodder use is not permitted in alpacas, horses, pigs, poultry and ratites. Last resort use is permitted on buffalo, camels, deer, but this has attracted some criticism including from vets, CIWF. DPI Vic, vets suggest the following changes that does not remove the opportunity to solve raceway blockages but clarifies the standard of use:

**SA5.8** Electric prodders must not be used:

i) on genital, anal or facial areas

ii) on livestock under three months old

iii) on livestock that are clearly unable to move away

iv) excessively repeatedly on an animal.

However the use of the subjective term ‘excessively’ has been accepted by the reference Group and no further change is recommended. Both terms require definition. If accepted GA5.11 is then clearly redundant but this was not agreed. “Electric prodders should not be used repeatedly on a single animal.”

AA, CIWF, AACT, PACAT, AL Qld, AL SA, A Angels, HAW, STAC wish to see the use of electric prodders banned (this objection is not repeated for each species in this report) and AA has suggested the following replacement to SA5.7:

**SA5.7** Electric prodders must not be used on any animal.

RSPCA Australia also supports a ban on prodders, especially any than are not battery or dynamo-powered. RSPCA Vic similarly supports a ban on the carriage of prodders in livestock transport vehicles (when livestock are being transported). On balance these requests are not supported on the basis of previous comprehensive Reference Group discussions. If a ban is supported, various guidelines will have to be deleted.

There is some call from vets that the age for permitted prodder use should be lifted to 6 months for all species. A guideline is proposed.

**GA5.13** “electric prodders should not be used on young livestock under 6 months old.”

NSW FA, VFF wish to see pigs added to the last resort category noting that EC regulation 1/2005 permits limited prodder use in adult pigs. APF recommend that limited electric prodder use is available for moving pigs as a last resort but this not supported by APL and governments. No change recommended for pigs.

**SB9.4** Electric prodders must not be used on pigs.

**SB9.x** Electric prodders must only be used on adult pigs after reasonable actions to cause movement have failed.
ACMF, ACGC support deletion of SB10.8 on the basis that it is not relevant for poultry and not needed to be ‘inclusive’. No replacement guideline necessary.

SB10.8—Electric prodders must not be used on poultry.

DPI Vic propose conversion of GB7.22 into a standard.

SB7.3 “Electric prodders must not be used on pregnant goats known to be pregnant.”

If these requests are successful, then a number of standards and guidelines relating to electric prodders will have to be deleted. In particular AA, RSPCA Australia is opposed to the use of electric prodders on adult deer (SB5.4). DAFWA believe that part iv) of SA5.7 is not verifiable and recommends that it be a guideline.

**Actions**

The following proposals are recommended and were agreed by the majority of the Reference Group:

SA5.7 “Electric prodders must not be used:

i) on genital, anal or facial areas

ii) on livestock under three months old

iii) on livestock that are clearly unable to move away

iv) excessively on an animal.

SB7.3 “Electric prodders must not be used on pregnant goats known to be pregnant.”

GB7.2 to be deleted.

New guideline:

GA5.13 “Electric prodders should not be used on young livestock under 6 months old.”

Poultry, delete SB10.8, no guideline considered necessary.

SB10.8—Electric prodders must not be used on poultry.

**SA5.8 Dogs and muzzling**

**Background**

The carriage of dogs as a species is not considered in this process. SA5.8 relates to control of dogs during loading, transporting and unloading of livestock. There is no requirement to muzzle if the handler does not wish to do so and the dog is not known to bite and is controllable. Muzzling is a practical and dog safety issue for handling operations at the property of origin, particularly for some livestock species. However, many depots and saleyards require muzzling of dogs on the facility. The biggest issue in the area of working
dog use is the impact of bites and harassment on the welfare of the smaller livestock species. The issue has been discussed at length by the Reference Group.

Use of dogs is permitted in the LTS on: cattle, deer, ratites, goats, horses, pigs, poultry, and sheep. Dogs are a valuable aide to handling of these species of livestock particularly for mustering from free range situations. Use of dogs is not permitted on: alpacas SB1.6, buffalo SB2.5, camels SB3.7, bobby calves SB4.7, and horses within livestock handling facilities SB8.13.

Submissions
The following minor changes are proposed by AHA to counter an omission in SA5.8 for Maremma’s etc. A Angels believe that transported dogs must not be in the same pen and also must be out of sight of livestock. DPI Vic recommends the inclusion of horses:

SA5.8 “Dogs must be under control at all times during loading, transporting and unloading livestock. Dogs must not be transported in the same pen as livestock and must not be visible to livestock, with the exception of bonded guardian dogs. Dogs that habitually bite; deer, goats, horses, pigs, poultry, sheep and ratites, must be muzzled.”

AA, CIWF, AL Qld, AL SA, A Angels, STAC recommends that all dogs are muzzled during yard activities. DAFWA, LTA WA believes that most of this standard is not verifiable and recommends that it be a guideline.

A Angels believe that “Dogs must not be used on calves, lambs, kids, pigs, deer, fawns, camels, or horses.” These issues have been discussed at length by the Reference Group and no further change is recommended.

A sentence in GA5.12 is proposed for deletion by SCA, MLA, AgForce Sheep and Wool as covered it is by SA5.8.

GA5.12 Dogs should be appropriately trained to move livestock and be responsive to commands. Dogs that bite should be muzzled at all times when working livestock. Dogs should be provided with water and rest after working.

Action
The following proposal is recommended and was agreed by the majority of the Reference Group:

SA5.98 “Dogs must be under control at all times during loading, transporting and unloading livestock. Dogs must not be transported in the same pen as livestock with the exception of bonded guardian dogs. Dogs that habitually bite; deer, goats, horses, pigs, poultry, sheep and ratites, must be muzzled.”

Definition:

Bonded guardian dogs are those dogs that live and are accepted within a flock or herd of another species on a permanent basis.

Guideline change recommended:
Dogs should be appropriately trained to move livestock and be responsive to commands. Dogs that bite should be muzzled at all times when working livestock. Dogs should be provided with water and rest after working.

Additional inspections and responsibilities during and after transport – drivers and others

Background
In addition to the overall standard SA1.1 and standards on fitness, water provisions and humane destruction, livestock must be inspected before loading, within the first hour of the journey and then every 3 hours and at unloading (SA5.11). Vehicles and facilities must also be inspected before use (SA5.10). The driver must provide assistance to a distressed animal at the first available opportunity (SA5.12). The person receiving the livestock must provide an appropriate response to deal with weak, ill or injured livestock (SA5.13). Caged poultry are an exception to the in-transit inspections, because continued travel is usually preferable, for reasons of ventilation and temperature control. Documentation of inspections is required for journeys reasonably expected to exceed 24 hours (SA1.2). These important areas have been discussed at length by the Reference Group.

Submissions

SA5.9 Ramp alignment
LTA WA believes that there should also be corresponding standards on the provision of adequate ramps. This issue is covered generally by SA3.1. A minor change is proposed by WPA, AgForce Sheep and Wool, VFF for consistent language.

SA5.10 Vehicles and facilities
QDPI, AL Qld propose the following exclusion for rail as train drivers are not responsible. RSPCA Australia propose the following other changes:

SA5.11 “The driver excluding rail transport, must inspect:

i) the livestock crate immediately before departure, to ensure that doors are closed it is fully operational, the load is secure, and that animals cannot escape and are suitably contained, without limbs protruding

ii) the receival yard immediately before unloading, to ensure that there is free access and sufficient space for the livestock intended to be unloaded and access to water, if a transfer of responsibility for livestock welfare to another person does not occur at that time.”

AL Qld also recommends that GB5.1 is developed into a standard as indicated above.
GA5.1 Before loading, the driver should inspect the condition of the livestock crate and ensure it is correctly set up and fully operational. If inspecting the vehicle at night or where light is insufficient, a portable source of lighting should be available.

The issue of ‘appropriate containment” so that animals cannot escape is covered under SA3.1.

SA5.11 covers livestock inspections during transport. The issue of ‘protrusion of limbs’ has also been discussed under SA3.1, whilst it represents an obvious threat to livestock welfare; it is not a transport emergency. Limb protrusion is regarded as not practical to implement as a standard at all times of transport, it is principally an issue when livestock become recumbent in the crate. The welfare significance of recumbency varies between the species and categories. Some species or categories may lie on their sternums or otherwise during transport such as; alpacas, camels, bobby calves, pigs and poultry. For the other species, recumbency would not normally be expected and it is reasonably expected that a driver would understand the species being transported and the need to ensure the standing position or otherwise. As a result of this a new guideline in addition to GA5.1 and a modification to the standard SA5.10 is proposed by AHA.

SA5.11 “The driver excluding rail transport, must inspect:

i) the livestock crate immediately before departure, to ensure that doors are closed

ii) the receival yard immediately before unloading, to ensure that there is free access and sufficient space for the livestock intended to be unloaded and access to water, if a transfer of responsibility for livestock welfare to another person does not occur at that time.”

GA5.X The driver should ensure that livestock limbs are not protruding from the crate before each departure.

LTA WA recommends that SA5.10 is reduced to a guideline and propose a standard that says:

SA5.x A person, who is not a person in charge, must not interfere with livestock or vehicles prior to or during transport, in such a way as to risk the welfare of livestock.

SA5.11 Livestock inspections

QDPI propose the following exclusion for rail as train drivers are not responsible. DPI Vic, AA, PACAT propose that the poultry exclusion be removed, not-with-standing the practical difficulties of effectively inspecting a load of caged poultry, the ability to remedy issues and the possible negative welfare aspects of additional stops. DPI Vic recommends that GA4.2 inspections at driver or vehicle changeovers, is included into SA5.11 and DPI Qld recommend the inclusion to GA4.2. PACAT, AL Qld, A Angels further suggest that there be a standard that requires a driver to inspect livestock when reasonably requested to do so by any person. This is not seen as being practically acceptable for drivers but may form the basis for a guideline as indicated. The words ‘reasonably requested’ take into account safety
and other aspects of transport management that a concerned public may not be aware of and
does not create a mandate for the public to be a nuisance to drivers.

ACMF pointed out that to require a stop for inspection mid-journey is a huge problem for
poultry (a) it will lead to increased mortalities (companies have been struggling for years to
get drivers to understand the importance of not stopping between pick-up and the processing
plant; drivers stopping used to be the single biggest cause of transport deaths in the industry;
stopping reduces ventilation (which is a problem in summer) and increases the overall time
in transit to the plant (an issue all year around). Furthermore, there is nothing a driver can do
if he were to see a problem (as he can’t unload crates; most modules for poultry transport
require specialised equipment for loading/unloading, see photo attached) other than to get to
the plant quick smart; he generally can’t inspect birds beyond those on the outside of the
load anyway; and he generally is travelling in situations in which he has no or very limited
opportunity to pull over to conduct an inspection. It is simply too dangerous to expect
this…and that’s the situation that probably 50-60% of chooks are transported to processing
plants in around Australia – ie they are travelling on metropolitan roads and freeways for the
most part, because processing plants are mostly located in metropolitan areas and the birds
are being brought in from the urban fringe area and most journeys are relatively short (ie 1 -
2 hours).

To summarise, requiring stopping for inspections during transport (a) will lead to increased
mortality, (b) is pointless, because the driver can’t do anything about the situation, even if
there were a problem (other than get them to the plant asap, which he could have done more
quickly if he hadn’t stopped)!, (c) in the case of most journeys, is simply not feasible
(without major rerouting, which will extend the length of the journey significantly), in the
case of most journeys for poultry in Australia.

The proposal for consideration is:

**SA5.11** “The driver excluding rail transport, must inspect livestock (except poultry):

i) on the vehicle before departure

ii) within the first hour of the journey and then at least every three hours or
   at each rest stop, whichever comes first

iii) at unloading

iv) At each driver or vehicle change over stop.

v) When reasonably requested to inspect livestock by a member of the
   public.

**GA4.2** For all journeys involving changeovers, livestock should be inspected for their
continued fitness for the intended journey at each driver or vehicle changeover
point during the journey.

drivers should exchange information on livestock welfare including last time
feed and watered and any livestock welfare concerns and actions taken.
GA5.X “The driver should inspect livestock when reasonably requested to do so by a member of the public.”

SA5.12 Weak, ill or injured Livestock
QDPI propose the following minor inclusion for rail as train drivers are not responsible.

SA5.12 “Upon identifying a distressed or injured animal at an inspection, the driver or Rail Authority must provide or seek assistance at the first opportunity. Weak, ill or injured livestock must be identified to the person receiving the livestock.”

PACAT, AL SA suggests that assistance must be provided ‘immediately’. The intention of the words ‘at the first opportunity’ here and elsewhere mean that the response will be at the first practical moment when facilities and skilled people are available, and when public, personal and remaining livestock safety is not jeopardised. This change is not supported here or elsewhere, consistent with the agreed intention of the document and because it is not practically achievable.

SA 5.13 Receival issues
CIWF, PACAT recommend a change for an immediate timeframe requirement that is not supported for the reasons given above but emphasis is given with inclusion of the words ‘at the first opportunity’. WPA requests a minor clarification:

SA5.13 “The person receiving the livestock must make arrangements at the first opportunity for separating weak, ill or injured livestock for rest and recovery and appropriate treatment, or humane destruction and disposal of dead stock”.

SA5.14 action due extreme weather conditions
DAFWA, LTA WA believes that this standard is not verifiable and recommends that it be a guideline. QDPI propose the following inclusion for rail as train drivers are not responsible.

SA5.14 “The driver or Rail Authority must make arrangements or take action during extreme hot or cold conditions to minimise the risk to the welfare of livestock.”

CIWF also recommend a timeframe requirement. A Angels recommend the following:

“Extreme is weather with an outside temperature of 35 degrees and over, and below 5 degrees. Providing cover and or shelter for the animals during wet and or cold weather and shade for animals in hot-35+ weather. Protection must be provided for recently shorn or young, weak, pregnant or older animals.”

The matter has been discussed in-depth and it has been agreed that the current standards are adequate. Standards for recently shorn animals are covered in the species sections. An inclusion to GA5.25 is recommended:

GA5.25 Weather conditions should be taken into consideration when transporting livestock if there is a risk of heat or cold stress particularly when the outside temperature is over 35 degrees or below 5 degrees Celsius.

STAC point out that lengthy delays prior to ship boarding in Devonport in summer are a cause for concern with trucks parked in hot conditions.
SA5.15. Accidents

DPI Vic recommends that the words “at the first opportunity” be replaced by “immediately” to protect animal welfare and this is not supported for reasons given above. ‘Available’ is to be deleted as it is unnecessary. Other changes from WPA, AgForce Sheep and Wool. The “person in charge” issue would be determined by circumstances as to who is able to take control in the circumstances; it is unlikely to be the driver in the case of a severe accident.

SA5.15 Where there is a road accident involving the transport vehicle, all livestock must at the first available opportunity be:

i) assessed, in the standing position if possible, and

ii) removed for treatment, or

iii) humanely destroyed at the accident site.

A Angels recommend the inclusion of the following on driving technique. -This issue is regarded by the Reference Group to be part of expected driver competency covered by general transport industry licensing arrangement. The proposed standard is not recommended and a guideline is recommended that is incorporated into or compliments GA5.22.

SA5.X “Stock vehicles conveying animals must be driven steadily, avoiding rapid acceleration and braking as far as possible. Corners must be rounded at an appropriate speed to reduce the centrifugal force as much as possible.”

GA5.X “Drivers must be made aware that sudden braking can subject animals to horizontal loads as high as 33% of their own weight. Sudden acceleration and rapid cornering can cause horizontal forces of up to 20% of the animal’s weight. Such loads will cause stress and may result in fall and injuries.”

Action

The following proposals to standards and guidelines are recommended and the following amendments were agreed by the majority of the Reference Group:

SA5.109 Drivers must ensure that the ramp and the vehicle are properly aligned and that any gap between the ramp and the vehicle is sufficiently narrow to avoid causing minimise the risk of injury during loading and unloading.

SA5.110 The driver excluding rail transport must: inspect:

i) inspect the livestock crate immediately before departure, to ensure that doors are closed

ii) inspect the receival yard immediately before unloading, to ensure that there is free access and sufficient space for the livestock intended to be unloaded and access to water, if a transfer of responsibility for livestock welfare to another person does not occur at that time.”

iii) take reasonable steps to notify a responsible person of the arrival of the livestock at the destination.
GA5.3 “The driver should ensure that livestock limbs are not protruding from the crate before each departure.”

SA5.x “A person, who is not a person in charge, must not interfere with livestock or vehicles prior to or during transport, in such a way as to risk the welfare of livestock.”

The regulating authorities and RSPCA did not regard this proposal as essential or reasonable.

SA5.11 “The driver excluding rail transport, must inspect livestock (except poultry):

i) on the vehicle before departure

ii) except poultry or when livestock travels domestically by sea on roll-on/roll-off livestock transport vehicles during a sea journey, within the first hour of the journey and then at least every three hours or at each rest stop, whichever comes first

iii) at unloading

iv) At each driver or vehicle changeover stop.

GA4.2 For all journeys involving changeovers, livestock should be inspected for their continued fitness for the intended journey at each driver or vehicle changeover point during the journey. Drivers should exchange information on livestock welfare including last time fed and watered and any livestock welfare concerns and actions taken.

GA5.X “The driver should inspect livestock when reasonably requested to do so by a member of the public.”

The regulating authorities and RSPCA did not regard this guideline proposal as essential or reasonable.

SA5.132 “Upon identifying a distressed or injured animal at an inspection, the driver or Rail Authority must provide or seek assistance at the first opportunity. Weak, ill or injured livestock must be identified to the person receiving the livestock.”

SA5.143 “The person receiving the livestock must make arrangements at the first opportunity for separating weak, ill or injured livestock for rest and recovery and appropriate treatment, or humane destruction and disposal of dead stock”.

SA5.154 “The driver or Rail Authority must make arrangements or take action during extreme hot or cold conditions to minimise the risk to the welfare of livestock.”

GA5.27 “Where there is any road accident involving the transport vehicle, all livestock should at the first available opportunity be
i) assessed, in the standing position if possible, and

ii) removed for treatment, or

iii) humanely destroyed at the accident site.

This proposal was downgraded to a guideline as it is recognised that often safety and resource issues at an accident site will take precedence over the best actions for livestock welfare. RSPCA Australia did not agree to this approach.

**GA5.2** Weather conditions should be taken into consideration when transporting livestock if there is a risk of heat or cold stress, particularly when the outside temperature is over 35 degrees or below 5 degrees Celsius.

**GA5.X** “Drivers should be aware that sudden acceleration and rapid cornering can cause horizontal forces of up to 20% of the animals’ weight. Sudden braking can subject animals to horizontal loads as high as 33% of their own weight. Such loads during starting, cornering and stopping will cause stress and may result in falls and injuries.”

The majority of the Reference Group felt that the temperatures were not relevant on a national basis across all species. The latter guideline proposal is adequately covered by GA5.22.

**Humane destruction**

**Background**

Humane destruction is an infrequent but necessary activity in livestock transport that involves significant training, equipment and OH&S issues. The issue has received much discussion by the Reference Group, particularly in the areas of competency and timing. It is recognised that the humane destruction standards agreed to for livestock transport will have wider application before and after transport.

**Submissions**

**SA6.2 Competency**

A number of stakeholders have concerns that the current standards do not require training or competency in all aspects of humane destruction. AA recommend that for journeys over 16 hours, AL SA – 8 hours, the driver is required to be competent to identify animals requiring euthanasia and be able to carry out the procedure. The current requirements recognise that not all drivers maybe so equipped or fully competent in this area are based on previous Reference Group discussions.

RSPCA Vic proposes that an emphasis is given that operators must also be competent in the techniques of bleeding out and pithing. RSPCA Australia, RSPCA Vic proposes that the assessment criteria in GA6.4 and GA6.5 be made into standards but this is not considered necessary in the context of SA6.4 as previously agreed by the Reference Group.

The Reference Group believes that the chapter two and six standards are adequate. However some further changes are recommended for deer, goats and sheep.
A change is proposed by AHA, RSPCA Vic to counter an omission in SA6.2 in relation to ‘moribund’ which does not include animals with gross limb injuries or other severe injuries that may arise. RSPCA Vic recommends a change to the definition of “moribund”:

“moribund - An animal that is unable to stand, exhibits signs of distress or insensibility, and is judged to have little chance of regaining the capacity to stand and walk unassisted after reasonable attempts have been made to assist it.”

RSPCA Australia, AL Qld and a number of other stakeholders seek assurance from the standard that humane destruction is carried out immediately, in situ or ‘without delay’ and ‘all efforts be made to avoid unnecessary handling of moribund animals’. The intention of the words ‘at the first opportunity’ here and elsewhere mean that the response will be at the first practical moment when facilities and skilled people are available, and when public, personal and remaining livestock safety is not jeopardised. This change is not supported here or elsewhere, consistent with the agreed intention of the document and because it is not practically achievable.

RSPCA Vic, also recommends that animals unable to walk off the transport vehicle be humanely destroyed on the vehicle without delay and that all drivers are competent and suitably equipped for the conduct of this procedure. CIWF support this and with AL Qld, AL SA who recommends that GA5.48 is incorporated into a standard. DPI Vic also recommends that animals unable to walk off the transport vehicle be humanely destroyed on the vehicle ‘at the first opportunity’. Reference is also made to the discussion on lifting and dragging.

GA5.48 Livestock (except caged poultry) that cannot walk from the vehicle (‘downers’) should be destroyed humanely on the vehicle, where practical. Alternatively, facilities, equipment and sufficient personnel should be available for the humane unloading of these livestock and their humane destruction.

SA5.X Livestock (except caged poultry) that cannot walk from the vehicle (‘downers’) must be destroyed humanely on the vehicle, where practical. Alternatively, facilities, equipment and sufficient personnel must be available for the humane unloading of these livestock and their humane destruction at the first opportunity.

It is felt that this proposal does not add much to the existing standards. GA5.48 to remain with the addition of the words; ‘at the first opportunity’.

LTA WA are concerned that the chapter 6 standards will require an investment on the part of transporters, are onerous and may result in poor animal welfare outcomes, but have no proposals for improvement. PACAT, RSPCA Vic support further investment in equipment and training. AL SA recommend that journeys over 8 hours carry a captive bolt stunner. The Reference Group has previously agreed that there will not be a mandate to carry equipment of this nature.

The resulting proposal for SA6.2 is:

SA6.2 “Humane destruction must be carried out:
i) on moribund or severely injured livestock

ii) by a competent person or under direct supervision of a competent person

iii) using an approved method for the species

iv) at the first opportunity

v) with the minimum amount of handling of the animal.

The last point v) could alternatively be added to GA6.2.

**SA6.4 Confirmation of death**

Stakeholders have pointed out that SA6.4 technically requires a person to perform a secondary procedure to ‘ensure death’ in all circumstances and this was not intended. The expected outcome is that animals will die humanely and across the spectrum of methods to perform humane destruction this secondary follow-up action is probably unreasonable. GA6.7 makes a recommendation for follow-up where there is doubt. The following change is recommended and it is noted that it has relevance to SA6.6 and SA6.7:

SA6.4 A person humanely destroying an animal must take reasonable action to confirm the animal is dead and or to ensure death.

**SA6.6 Captive bolt**

It has been suggested that the content of GA6.11 is essential SOP and should be recognised in the standards – it could be included in SA6.6, with changes also recommended to SA6.7, and then GA6.11 be deleted. The dairy industry does not agree with the last part of SA6.6. They believe that the situation is adequately covered by SA6.1, SA6.2, & SA6.4 and do not wish to see farmers and transporters forced to undertake a further procedure on cattle that have been effectively and humanely destroyed by a captive bolt. Further guidelines are recommended below.

GA6.11 “The captive bolt stunner should be pressed firmly on the head before being discharged, and should be positioned as described in the approved positions for each species of livestock. The temporal position is not an option.”

SA6.6 Captive bolt use must be in the frontal or poll positions, not the temporal position, be accompanied by appropriate restraint, be applied in contact with the forehead, and be followed by an effective procedure to ensure death.

**SA6.7 Blunt trauma**

This technique is only permitted for the newborn young of; alpacas, camels, cattle, deer, goats, pigs <15kg, & sheep. The dairy industry, AMIC believe that the words ‘specified newborn livestock’ in SA6.7 leads to confusion and could be improved possibly be replacing ‘specified’ by ‘where permitted in’. RSPCA Australia, A Angels does not support the use of blunt trauma on piglets over 24 hours old (i.e. not up to 15 kg).
AA believes that the requirement in SA6.7 for ‘an effective procedure to ensure death’ must be reinforced with the words suggested below. They believe that this message should also be repeated in the seven part B standards relating to blunt trauma:

‘must be followed by bleeding or pitting whilst unconscious (an effective procedure) to ensure death’.

The dairy industry does not agree with the last part of SA6.7. They believe that the situation is adequately covered by SA6.1, SA6.2, & SA6.4 and do not wish to see farmers and transporters forced to undertake a further procedure on calves that have been effectively and humanely destroyed by blunt trauma. Some stakeholders wish to see further prescription on how the method is carried out. The following proposals are recommended:

SA6.7 Blunt trauma to the brain must only be used on specified newborn livestock less than 24 hours old such as: alpacas, camels, cattle, deer, goats, and sheep, or piglets up to 15 kilograms live weight and must be followed by an effective procedure whilst unconscious to ensure death.

GA6.7 If it is not certain that an animal is dead, then an approved method should be used immediately to ensure death in a rapid and humane manner. If necessary, bleeding-out or pithing should be used to ensure death in unconscious livestock.

A new guideline is proposed for the newborn young of; alpacas, camels, cattle, deer, goats, pigs <15kg, & sheep.

GBX.X Use of blunt trauma on X should be followed by bleeding or pithing whilst unconscious to ensure death.

SA6.8 A minor change proposed by DPI Vic to aid enforcement.

SA6.8 Animals must be assessed to be unconscious before pitting.

Bleeding out competency - Deer, goats and sheep

The following change to include the words: or under the direct supervision of a competent operator has been suggested by WPA, VFF, RSPCA Vic for SB5.5, SB7.3 & SB11.3 as a duplication of SA2.1 to highlight the importance of competency for performing the neck cut in conscious animals of these species. The inclusion of deer is a further recommendation.

DPI Vic has suggested the following addition to GA6.17 The cut should transect both the carotid arteries and both the jugular veins.

SB5.5 Approved methods of humane destruction for:

i) deer over 6 months old are firearm, captive bolt, lethal injection or bleeding out; bleeding out by neck cut must be done only by a competent operator or under the direct supervision of a competent operator and in situations where there is no firearm or captive bolt available
ii) fawns / calves are firearm, captive bolt, lethal injection, bleeding out or blunt trauma; bleeding out by neck cut must be done only by a competent operator or under the direct supervision of a competent operator and in situations where there is no firearm or captive bolt available; blunt trauma must only be used for fawns / calves that are less than 24 hours old and where there is no firearm or captive bolt available.

CO2
AHA proposes the following for completeness. Further reference is made in the poultry chapter. ACMF also point out that it is unreasonable for commercial poultry transporters to be required to humanely destroy poultry enroute.

GA6.X  Use of CO2 should be considered for smaller species and should follow established standard operating procedures for the technique and species, including a minimum of 70% CO2 and exposure for one minute or longer.

Minor changes are proposed to the GA6.10 note by AHA to improve clarity. The line of fire will vary with the angle of the head and the position of the shooter.

“For the frontal method, the firearm or captive bolt should be directed at a point midway across in the middle of the forehead where two lines from the topside of the base of the ears and top of the eyes intersect (pigs – from the bottom side of the ears to the eyes). The line of fire should be aimed horizontally into the skull towards the imagined centre of the brain or spinal cord as indicated in the diagrams”.

RSPCA Australia propose an additional note below the standards; “points of aim for firearms and captive bolts are shown in a diagram for each species as relevant”.

DPI&W Tas propose a minor change for clarity to apply to all relevant firearms guidelines being:

GB1.21 A firearm should deliver at least the power muzzle of energy of a standard 0.22-long rifle cartridge.

Action
The following proposals are recommended and the following amendments were agreed by the majority of the Reference Group:

SA6.2 Humane destruction must be carried out:

i) on moribund or severely injured livestock

ii) by a competent person or under direct supervision of a competent person

iii) using an approved method for the species

iv) at the first opportunity

iv) with the minimum amount of handling of the animal.
A lot of discussion occurred over the term “moribund” and it was decided by the majority of the reference group that this term represents a subset of the “downer” livestock that will not respond to reasonable assistance measures, the definitions have been adjusted.

“Downer” - an animal that is lying down and appears not able to rise.

Moribund - An animal that is unable to stand, exhibits signs of distress or insensibility, and is assessed judged to have little chance of regaining the capacity to stand and walk unassisted after reasonable attempts have been made to assist it.

GA5.48 Livestock (except caged poultry) that cannot walk from the vehicle (‘downers’) should be destroyed humanely on the vehicle, where practical. Alternatively, facilities, equipment and sufficient personnel should be available for the humane unloading of these livestock and their humane destruction at the first opportunity.

SA6.4 A person humanely destroying an animal must take reasonable action to confirm the animal is dead and or to ensure death.

SA6.6 Captive bolt use must be:

i) in the frontal or poll positions, not the temporal position

ii) be accompanied by appropriate restraint

iii) be applied in contact with the skull forehead, and be followed by an effective procedure to ensure death.

Note: points of aim for firearms and captive bolts are shown in a diagram for each species as relevant.

GA6.11 “The captive bolt stunner should be pressed firmly on the head before being discharged, and should be positioned as described in the approved positions for each species of livestock. The temporal position is not an option.”

SA6.7 “Blunt trauma to the brain must only be used on piglets up to 15 kilograms liveweight or the following species if less than 24 hours old: alpacas, camels, cattle, deer, goats, and sheep, or piglets up to 15 kilograms liveweight, and must be followed by an effective procedure whilst unconscious to ensure death.”

GA6.7 If it is not certain that an animal is dead, then an approved method should be used immediately to ensure death in a rapid and humane manner. If necessary, bleeding-out or pithing, or another technique should be used to ensure death in unconscious livestock.

GA6.17 Bleeding out of deer, goats and sheep without prestunning using the neck cut should only be done as a last resort by a skilled person using a suitable, sharp knife and adequate restraint of the animal. The cut should transect both the carotid arteries and both the jugular veins.
New guidelines are proposed for the newborn young of: alpacas, camels, cattle, deer, goats, pigs <15kg, & sheep. This guideline will appear at the end of the aforementioned species chapters.

GBX.X If necessary, use of blunt trauma on X should be followed by bleeding out or pithing - another technique whilst unconscious to ensure death.

SA6.8—Animals must be assessed to be unconscious before pithing.

It was agreed that pithing is just another secondary technique to cause death in unconscious animals but the method is not in common usage and is discouraged in some sectors, so references have been removed.

In the light of the deletion of SA6.8 and the change to the poultry humane destruction standard to a guideline and equivalent changes for all other species, it is proposed to delete SA6.9 as it is no longer relevant. Lethal injection is seen as another acceptable technique that is available to a select group of people which are not those mostly involved in everyday transport activities.

SA6.9——- Lethal injection is an approved method for all species but must be performed by a veterinarian or an approved person.

Note under GA6.10. “For the frontal method, the firearm or captive bolt should be directed at a point midway across the forehead where two lines from the topside of the base of the ears and top of the eyes intersect (pigs – from the bottom side of the ears to the eyes). The line of fire should be aimed horizontally into the skull towards the imagined centre of the brain or spinal cord as indicated in the diagrams.

Changes to SB5.5 to be repeated for SB7.3, SB11.3:

SB5.5 Approved methods of humane destruction for:

i) deer over 6 months old are firearm, captive bolt, lethal injection or bleeding out; bleeding out by neck cut must be done only by a competent operator or under the direct supervision of a competent operator and in situations where there is no firearm or captive bolt available.

ii) fawns / calves are firearm, captive bolt, lethal injection, bleeding out or blunt trauma; bleeding out by neck cut must be done only by a competent operator or under the direct supervision of a competent operator and in situations where there is no firearm or captive bolt available; blunt trauma must only be used for fawns / calves that are less than 24 hours old and where there is no firearm or captive bolt available.

To be repeated for all relevant species firearm guidelines.

This decision was superseded when the recommended by a Reference group recommended decision to incorporate all humane destruction methods into the guidelines at SRG meeting 8. The Reference Group decided to retain a general standard for blunt trauma and...
bleeding out:

SA6.7 Blunt trauma to the brain must only be used on piglets up to 15 kilograms liveweight or the following species if less than 24 hours old; alpacas, camels, cattle, deer, goats, and sheep.

SA6.8 Bleeding out by neck cut must be done only by a competent operator or under the direct supervision of a competent operator and in situations where there is no firearm or captive bolt available and only for deer, goats or sheep.

A statement on blunt trauma is to be included in the humane destruction guidelines for all relevant species.

“The blunt trauma should only be used when there is no other recommended option for humane destruction, and can only be used on calves that are less than 24 hours old.”

To be repeated for all relevant species firearm guidelines.

GB1.21 A firearm should deliver at least the muzzle energy of a standard 0.22-long rifle cartridge.

It was agreed that CO2 is not particularly relevant for actual transport and is covered by other guidelines.

GA6.X Use of CO2 should be considered for smaller species and should follow established standard operating procedures for the technique and species, including a minimum of 70% CO2 and exposure for one minute or longer.

It was agreed that CO2 is not particularly relevant for actual transport and is covered by other guidelines.

Alpacas

Background
The Australian Alpaca Association has provided effective representation for this minority species. A high standard of care has been recommended consistent with the nature and requirements of this species.

Submissions
Brookwood Alpacas proposes a number of changes to the time off water limits. They point out that travel in urban areas does not allow safe stops for feeding and recommend that limits for lactating cria and cria up to 6 months old can be increased to around 4 hours. Additional categories suggested are not reported.

AAA requested the following change to SB1.1.

SB1.1 Time off water must not exceed the time periods given below:
<table>
<thead>
<tr>
<th>Class</th>
<th>Maximum time off water (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wethers over 12 months old</td>
<td>24</td>
</tr>
<tr>
<td>Non-pregnant females and males over 12 months old</td>
<td>24</td>
</tr>
<tr>
<td>Alpacas 6 to 12 months old</td>
<td>8</td>
</tr>
<tr>
<td>Alpacas known to be up to 7.5 months pregnant</td>
<td>8</td>
</tr>
<tr>
<td>Alpacas known to be more than 7.5 months pregnant, excluding the last 4 weeks</td>
<td>4</td>
</tr>
<tr>
<td>Lactating alpacas with crias up to 6 months old</td>
<td>24</td>
</tr>
<tr>
<td>Crias up to 6 months old</td>
<td>24</td>
</tr>
</tbody>
</table>

DPI Vic, Brookwood Alpacas proposes that GB1.14 is developed into a standard and this is supported by AAA.

SB1.x  “Young and newly shorn alpacas (8–10 days off shears) are susceptible to windchill and should be transported in vehicles with enclosed fronts or provided with protection during weather that could cause heat or cold stress or sunburn.”

SB1.2 Journey time may be extended to 72 hours for all alpacas only under the following conditions:

- alpacas must have constant provision of water and feed on the vehicle at all times
- there must be space for all alpacas to sit down or ‘cush’
- alpacas must be assessed regularly every three hours or at every stop to see whether they are fit for the remainder of the intended journey
- alpacas must be allowed a spell of 24 hours before starting another journey.

SB1.4 Alpacas known to be in the last 4 weeks of pregnancy must only be transported

Brookwood Alpacas propose a number of changes to the time off water limits. They point out that travel in urban areas does not allow safe stops for feeding and recommend that limits for lactating crias and crias up to 6 months old can be increased to around 4 hours.

The following minor change has been suggested by DPI&W Tas. Use of the structure “must only” has been avoided in this document as an unnecessary emphasis. If agreed, there are numerous instances where it could be used and this consideration must be part of the decision.

GB1.5 Voluntary spells should be avoided due to the risks associated with unloading and reloading.

Clarification proposed by QDPI

Omission

Consistent with SA5.11, horses and camels.
under veterinary advice unless the journey is less than 4 hours in duration.

**Action**

Time off water, contingency extensions, spelling, electric prodders and dog issues have also been considered separately in this report.

The following proposals are recommended and the following amendments were agreed by the majority of the Reference Group:

**SB1.1** Time off water must not exceed the time periods given below:

<table>
<thead>
<tr>
<th>Class</th>
<th>Maximum time off water (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wethers over 12 months old</td>
<td>36</td>
</tr>
<tr>
<td>Non-pregnant females, wethers and males over 12</td>
<td>24</td>
</tr>
<tr>
<td>months old</td>
<td></td>
</tr>
<tr>
<td>Alpacas 6 to 12 months old</td>
<td>8</td>
</tr>
<tr>
<td>Alpacas known to be up to 7.5 months pregnant</td>
<td>8</td>
</tr>
<tr>
<td>Alpacas known to be more than 7.5 months pregnant,</td>
<td>4</td>
</tr>
<tr>
<td>excluding the last 4 weeks</td>
<td></td>
</tr>
<tr>
<td>Lactating alpacas with crias up to 6 months old</td>
<td>24</td>
</tr>
<tr>
<td>Crias up to 6 months old</td>
<td>24</td>
</tr>
</tbody>
</table>

**SB1.5** “Young and newly shorn alpacas (8–10 days off shears) are susceptible to windchill and should **must** be transported in vehicles with enclosed fronts or provided with protection during weather that could cause heat or cold stress or sunburn.”

GB1.14 is redundant and to be deleted.

**SB1.2** Journey time may be extended to 72 hours for all alpacas only under the following conditions:

- alpacas must **have constant provision** of water and feed on the vehicle
- there must be space for all alpacas to sit down or ‘cush’
- alpacas must be **assessed** every three hours or at every stop to see whether they are fit for the remainder of the intended journey
- alpacas must be allowed a spell of 24 hours before starting another journey.

<table>
<thead>
<tr>
<th>Clarification proposed by QDPI</th>
<th>Omission</th>
<th>Consistent with SA5.11.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

A further generic change has been made to the humane destruction standard.
Approved Recommended methods of humane destruction include:

i) For adult alpacas are firearm, or captive bolt or lethal injection

ii) For crias are firearm, captive bolt, lethal injection or blunt trauma. Blunt trauma must only be used for crias that are less than 24 hours old and where there is no firearm or captive bolt available.

**Buffalo**

**Background**
The Australian domesticated buffalo industry is relatively small but it has been difficult to engage members in consultation.

**Submissions**
A number of stakeholders made submissions about pregnancy and electric prodders and these matters are considered in the relevant sections.

Minor changes in guidelines only are recommended.

<table>
<thead>
<tr>
<th>GB2.x</th>
<th>During hotter weather, buffalo should be transported at night.</th>
<th>Proposed by WRSC NT.</th>
</tr>
</thead>
<tbody>
<tr>
<td>GB2.x</td>
<td>Aggressive bulls should be segregated and / or restrained by a head rope</td>
<td>Proposed by WRSC NT.</td>
</tr>
<tr>
<td>GB2.x</td>
<td>Buffalo should be inspected hourly for the first three hours if transported on dirt roads. Particular attention should be paid to animals on the last trailer.</td>
<td>Proposed by WRSC NT.</td>
</tr>
<tr>
<td>GB2.x</td>
<td>Buffalo should be left on the vehicle during rest or watering stops and parked under shade in hot conditions, where possible.</td>
<td>Proposed by WRSC NT.</td>
</tr>
</tbody>
</table>

**Action**
Time off water, contingency extensions, spelling, electric prodders and dog issues have been considered separately in this report. The following amendments were agreed by the majority of the Reference Group.

A generic change has been recommended to the humane destruction standard.

Approved Recommended methods of humane destruction include:

i) For buffalo are firearms or lethal injection

ii) For calves are firearms, or captive bolts or lethal injection.

All of the proposed guidelines are recommended for adoption.
During hotter weather, buffalo should be transported at night.

Aggressive bulls should be segregated and/or restrained by a head rope.

Buffalo should be inspected hourly for the first three hours if transported on dirt roads. Particular attention should be paid to animals on the last trailer.

Buffalo should be left on the vehicle during rest or watering stops and parked under shade in hot conditions, where possible.

Additional information

The following minimum space allowances should be provided:

<table>
<thead>
<tr>
<th>Mean liveweight (kg)</th>
<th>Minimum floor area (m²/500 kg)</th>
<th>Number of head per 12.5 m X 2.4 m deck</th>
</tr>
</thead>
<tbody>
<tr>
<td>200</td>
<td>0.69</td>
<td>43</td>
</tr>
<tr>
<td>250</td>
<td>0.77–0.79</td>
<td></td>
</tr>
<tr>
<td>300</td>
<td>0.86–0.89</td>
<td></td>
</tr>
<tr>
<td>350</td>
<td>0.98–1.01</td>
<td></td>
</tr>
<tr>
<td>400</td>
<td>1.05–1.09</td>
<td></td>
</tr>
<tr>
<td>450</td>
<td>1.13–1.18</td>
<td></td>
</tr>
<tr>
<td>500</td>
<td>1.23–1.28</td>
<td></td>
</tr>
<tr>
<td>550</td>
<td>1.34–1.40</td>
<td></td>
</tr>
<tr>
<td>600</td>
<td>1.47–1.55</td>
<td></td>
</tr>
<tr>
<td>650</td>
<td>1.63–1.73</td>
<td>18–17</td>
</tr>
</tbody>
</table>

Camels

Background

The domesticated camel industry is a minority species but consultations have occurred with camel owners and the Central Australian Camel Industry Association. The camel code has been revised in 2006 and this revision has some relevance for transport. The camel is a ruminating species (3 stomachs) that is treated like other ruminants but it is in a separate sub-order Tylopoda rather than sub-order ruminantia – the true ruminants. This fact is relevant for the RIS.

Submissions

RS SA proposes that:

SB3.X Camels under 12 months old must not be transported in the same pen as adult camels.

It is considered that SA5.5 is adequate to address this situation and this clause is more appropriate as a guideline.

GB3.X Camels under 12 months old should not be transported in the same pen as adult camels.
The following new standard is proposed to cover an omission as camel bulls in rut can be dangerous.

**SB3.X** Camel bulls in rut must be segregated during transport.

RS SA proposes the removal of ‘abscesses’ from GB3.1 as the condition is common in camels and not a welfare concern. Also the water engorgement issue is over stated.

**GB3.1** Conditions that could cause camel welfare to decline during transport and should be considered unfit for transport might include lethargic camels and camels with profuse chronic diarrhoea, disease, or wounds or abscesses. A decision to transport a camel should be made after considering the welfare of the animal concerned, as well as the treatment and management options.

**GB3.3** Camels should be monitored carefully when reintroducing them to water following transport. Dehydrated camels may gorge themselves when reintroduced to water, but with rare adverse effects on their welfare. Severely dehydrated camels should rehydrate over several hours.

RS SA, QDPI propose the addition of extra explanation to GB3.8:

**GB3.8** Camels should spend as little time as possible on hard surfaces that can cause injury to foot pads or that wear the pedestal and kneeling pads of the animal. Cross cleats must either be removed from trucks or covered totally with a generous layer of hay, straw or sand. Surface bedding should be checked during a long trip.

QDPI propose that the clearance height in GB3.7 and GB3.10 should be 2.7m. They also propose a new guideline for loading and ramps:

**GB3.X** Camels should be loaded up ramps with solid earthen floors. The incline should be as low as possible, preferably 10-20 degrees. Hollow sounding ramps make camels disinclined to load. Camels are best end-loaded into a truck. Side loading of camels can also be difficult as they do not perceive there is enough room to enter or move in the crate.

The following new guidelines are proposed:

<table>
<thead>
<tr>
<th>GB3.x</th>
<th>Livestock crate floors should be smooth and free of tread mesh to facilitate sternal recumbency. Carpet or damp sand is recommended as a floor covering for long distance transport.</th>
<th>Proposed by WRSC NT.</th>
</tr>
</thead>
<tbody>
<tr>
<td>GB3.x</td>
<td>Livestock crate walls should have small gaps to prevent entrapment of foot pads.</td>
<td>Proposed by WRSC NT.</td>
</tr>
</tbody>
</table>

The following clarification is proposed by AHA:
SB3.2 Journey time for camels over 6 months old, excluding camels known to be in the final month of pregnancy, may be extended to 72 hours only under the following conditions:

i) camels must be watered and fed on the vehicle every 24 hours

ii) there must be space for all camels to lie down on their sternums

SB3.5 When standing at rest, camels must have a minimum of 100 mm clearance between the top of their hump and the livestock crate.

A number of stakeholders made submissions about pregnancy and electric prodders and these matters are considered in the relevant sections.

Actions

Time off water, contingency extensions, spelling, electric prodders and dog issues have also been considered separately in this report. The following proposals are recommended and the following amendments were agreed by the majority of the Reference Group:

SA3.8 Camel bulls in rut must be segregated during transport.

SB3.2 Journey time for camels over 6 months old, excluding camels known to be in the final month of pregnancy, may be extended to 72 hours only under the following conditions:

i) camels must be watered and fed on the vehicle every 24 hours

ii) there must be space for all camels to lie down on their sternums

SB3.5 When standing at rest, camels must have a minimum of 100 mm clearance between the top of their hump and the livestock crate.

A further generic change has been recommended to the humane destruction standard.

SGB3.816 Approved Recommended methods of humane destruction for camels over 6 months old are include firearm or captive bolt, or lethal injection.

Recommended methods of humane destruction for camels less than 6 months old include firearm, captive bolt, or blunt trauma. Blunt trauma must only be used when there is no other approved option for humane destruction, and only on camel calves that are less than 24 hours old.

The following note under the standards to be removed as it is no longer relevant:

Note

Usually, camels are watered on transport vehicles for long distance journeys.

Unloading for spells should be avoided for welfare and biosecurity reasons.

However, spells longer than 4 hours during transport can be deducted from the total water deprivation time. A spell less than 4 hours is not recommended or recognised for calculation of water deprivation time, but can be taken as necessary.
The following changes to guidelines are recommended:

GB3.1 Conditions that could cause camel welfare to decline during transport and should be considered unfit for transport might include lethargic camels and camels with profuse chronic diarrhoea, disease, or wounds or abscesses. A decision to transport a camel should be made after considering the welfare of the animal concerned, as well as the treatment and management options.

GB3.3 Camels should be monitored carefully when reintroducing them to water following transport. Dehydrated camels may gorge themselves when reintroduced to water, but with rare adverse effects on their welfare. Severely dehydrated camels should rehydrate over several hours.

GB3.8 Camels should spend as little time as possible on hard surfaces that can cause injury to foot pads or that wear the pedestal and kneeling pads of the animal. Cross cleats must either be removed from trucks or covered totally with a generous layer of hay, straw or sand. Surface bedding should be checked during a long trip.

GB3.9 Camels should be loaded up ramps with solid earthen floors. The incline should be as low as possible, preferably 10-20 degrees. Hollow sounding ramps make camels disinclined to load. Camels are best end-loaded into a truck. Side loading of camels can also be difficult as they do not perceive there is enough room to enter or move in the crate.

GB3.10 Livestock crate floors should be smooth and free of tread mesh to facilitate sternal recumbency. Carpet or damp sand is recommended as a floor covering for long distance duration transport.

GB3.11 Livestock crate walls should have small gaps to prevent entrapment of foot pads.

GB3.12 Camels under 12 months old should not be transported in the same pen as adult camels.

The following corrections and clarifications are proposed by RS SA:

GB3.6 The following space allowances should be provided:

<table>
<thead>
<tr>
<th>Mean liveweight (kg)</th>
<th>12.2 m x 2.34 m (deck)²</th>
</tr>
</thead>
</table>

GB3.7 Yards should have race walls with a height of 1.8 m, and metal loading races should be covered with dirt to avoid excessive noise and foot damage. Yards should be large enough to allow all camels to lie sit down on their sternums at the same time.

GB3.13 Livestock crates should allow a resting hump clearance for land transport of 100 mm. When moving, the highest part of the camel is the hump, while the head is generally lowered. Walking hump height will lower by is 100 mm–200 mm lower than resting hump height between resting and walking state, allowing clearance under the gates and stays may be lower.
than the bows of a crate as long as hump height clearance is appropriate.

Camels should be left on the vehicle during rest or watering stops and should be parked under shade in hot conditions, where possible.

Camels may be temporarily tied in sternal recumbency to prevent injury. If camels are to be tied in sternal recumbency, they should be released and allowed to stand at least every four hours.

Camels may be temporarily tied in sternal recumbency to prevent injury. Camels should not be tied to trees or other structures by ropes or halters that are attached to the neck unless sufficient rope and low tying of the rope is provided. Camels tied to structures by ropes should not be left unattended.

**SB 4.5, Bobby Calves 5-30 days**

**Background**

In the standards and guidelines, bobby calves are part of the cattle chapter, but separated here for more complete treatment. Approximately 955,000 dairy calves are transported for slaughter each year and this represents the major movement of unweaned mammalian livestock. Reliable indicators of welfare for this low value category are difficult to define. Solving issues of bobby calf welfare requires a multi-factorial approach. The current standard SB4.5 was reached after additional working group input.

Determining the age of calves is currently problematic. Defacto measures of age such as navel condition or hoof condition are not absolutely reliable. Reference to body weight also has issues due to breed variation. The RIS has determined that extending the minimum age to 8 days will result in significant cost to industry. Worldwide study tours have found that such age thresholds are not enforced in dairying nations. A key measure is that calves can walk unaided – this is seen as being embodied in clause SA4.1 i).

The model code for the Land Transport of Cattle clause 9.5.3 b) suggests that calves should be fed every 10 hours – this has proven to be impossible in practice and not consistent with on-farm calf rearing. Seasonal peaks in calving exacerbate the issue of abattoir availability. The issue of journey time has been debated and alternatives of 10, 12, 14, 18 & 24 hours previously considered. Journey time is extended by complications relating to farm pick-ups and saleyards. Use of depots will expedite calf transport. A practical minimum standard is required for the feed deprivation interval.

**Submissions**

**Age for transport**

The Dairy Industry, VFF, TFGA supports the current proposal for transport after 5 days and suggests that Option B1 of the RIS may not include all of the relevant additional costs associated with holding for an additional 3 days. Supporters of an older age threshold for bobby calves are; RSPCA Qld, 7 days, AMIC 8 days, AA, RSPCA Australia, CIWF, AACT - 10 days, LOBSA SA – 10 days+. AMIC, AA suggests that the RIS does not recognise all the potential financial benefits of this strategy when the authors have currently estimated to be insignificant. AMIC recommends that the age statement must be made clear “calves must be between X and 30 days old”. AMIC has concerns about the verification of calf age and supports the return of a statement about the umbilicus as a measure of age in lieu of a
requirement for documented age records. HAW does not support the transport of calves to slaughter. The Regulation Impact Statement investigation has shown that increasing calf age will result in significant cost for a questionable welfare benefit. Literature reviews from AMIC and DA were tabled just prior to the Reference Group meeting. On balance it was considered that the scientific evidence favoured the status quo of the current proposal. Further research and data is necessary. No further change is recommended.

**Age**
RSPCA Qld recommend that the bobby calf age bracket be extended from 30 days to 2 months old; with the next calf category being revised to 2-6 months old. RSPCA Vic in contrast recommends that the upper age limit be restricted to 2 weeks old as the relevant period for this trade. AMIC feel that the range of calf ages is confusing and that bobby calves should be standardised as those calves less than 6 weeks old to be consistent with NVD and the meat industry. On balance, no change is recommended here. If change is agreed to, there will be a number of standards and guidelines that will have to be revised.

**Definition proposal**
AMIC recommends; Bobby calf – ‘A calf not accompanied by its mother, less than 30 days 6 weeks old, weighing less than 80 kg liveweight, and usually a dairy breed or cross’.

There are various general concerns about the accuracy of the RIS in examining option B1 costs and benefits in relation to an increased age of bobby calves before transport.

**Time off water / feed**
The Dairy Industry, DPI Vic, DPI&W Tas, VFF suggests that this issue and the clause in SB4.1 are not relevant and should be deleted and replaced by a clause for ‘calf feed’ within SB4.5 ii). AA, RSPCA Australia, RSPCA Victoria, CIWF, AL SA believes that the maximum time of feed should be 12 hours, AACT – 6 hours, AL Qld – 8 hours. DPI&W TAS supports 18 hours but also the inclusion of a clause in SB4.5, being:

> “have been fed on colostrum, milk or milk replacer”

The Dairy industry, NSW FA, VFF, TFGA does not support the recommended time interval between feeds for calves of 18 hours and recommends that 24 hours is more appropriate in line with accepted farming practice and research. Research studies on the effects of food withdrawal and transport on 5- to 10- day old calves found no detrimental effects after 30 hours on the metabolism of healthy and clinically normal calves (Todd et al. 2000. Res Vet Sci 68: 125-134).

It is noted that this clause is not worded clearly at present and this has led to the further post SRG7 discussion below. The Dairy Industry further proposes deletion of GB4.9:

> GB4.9 Calves between 5 and 30 days old travelling without mothers should have a liquid feed every 12 hours.

The Dairy Industry, AMIC, DPI Vic, DPI&W Tas, VFF supports the inclusion within SB4.5 of a clause:

> “be fed on the farm within 6 hours of transport”

Post SRG7 a further issue was detected and further discussions occurred that led to the
adoption of a revised clause SB4.5iv) that is a transport and handling time limitation as follows.

**SB4.5 iv) “be prepared and transported to ensure a time between feeds of not more than 18 hours”**

This clause creates an issue of an expectation that calves will be fed at abattoirs at night or slaughtered within 18 hours, which was not widely recognised. Very few abattoirs are able to run double shifts and very few abattoirs are able to feed large numbers of calves. The intention was to create a standard that changes industry calf delivery practices to abattoirs.

The option that was considered by a group to consider as a clarification with some change is:

**SB4.5 iv) “be prepared and transported to ensure delivery in less than 18 hours from last feed, with no more than 12 hours spent on transports”**

These words remove the feeding requirement and make this standard into a limitation on handling and transport time only. A requirement for feeding at the destination is considered to be relevant to calf welfare but out of scope of these standards. There are good arguments for lesser and higher positions. The standard does allow the objective of reasonable calf welfare to be achieved without major industry consequences. This provision is achievable under new driver fatigue management rules. In this context, the post consultation proposal to delete the SB4.1 bobby calf standard for 18 hours water deprivation has been reconsidered and preserved.

Underlying this, POCTA provisions will still apply to any unsatisfactory outcomes. RSPCA and AA are not supportive of the revision and feel that the standards will not lead to satisfactory bobby calf welfare. The regulatory departments reserve the right to set higher standards if the new standard does not achieve an improvement in calf welfare. AMIC, DA, ADF welcome the revision and highlight that there are many ‘better practice’ aspects that will be pursued by industry. The dairy and meat processing industries are committed to co-ordinating efforts to improve calf welfare in the bobby calf trade. It has been indicated at SRG7 that a further progress on the bobby calf issue and a possible future review of the standards and guidelines is necessary.

**Records**

The Dairy Industry, VFF recommends that the clause in SB4.5 iii) be deleted, particularly if the clause about feeding within 6 hours of transport is adopted. DPI Vic supports the move to identify calves and keep birth date records.

**Distance / journey time**

RSPCA Australia, DPI Vic, DPI&W Tas recommend that the time interval from farm to abattoir not exceed 10 hours, AACT – 6 hours, PACAT -2 hours. DPI Vic, DPI&W TAS also supports a 500 km limit. DPI Vic, AA believes that the distance should be minimised with travel only to the closest abattoir. This is also supported by RSPCA Victoria, who recommend further that saleyards and other locations are excluded from the journey. CIWF support adoption of EC rules for calves. The Dairy Industry has sought to delete time and distance guidelines (see proposed minor changes table below). It is likely that the final
document will require some modification of GB4.3, GB4.4, and GB4.15.

**Fitness**

AA believes that there should be prescriptive standards to specifically address the issue of dehydration (scours) and induced or premature calves in addition to SA4.1 and SB4.5. DPI&W TAS, DPI Vic recommends the following fitness clauses:

i) have a navel cord which is wrinkled, withered and shrivelled and not pink or red coloured, raw or fleshy

ii) have hooves that are firm and worn flat and not bulbous with soft unworn tissue

iii) be in good health, alert and able to rise from a lying position; they should not be listless and unable to protect themselves

iv) be strong enough to withstand the stress of travel and have been adequately fed; not obviously diseased, not malformed, blind or disabled in any way; and not be wet and cold.

AVA, PACAT, AL Qld supports this approach in a general sense. Adoption of these clauses may make GB4.4 redundant.

DPI Vic, AL SA support development of GB4.5 into a separate standard:

GB4.5—Calves born earlier than a normal pregnancy term (including induced calves) should be at an equivalent stage of fitness when transported, compared with normal, full-term calves.

SB4.x “Calves born earlier than a normal pregnancy term (including induced calves) should *must* be at an equivalent stage of fitness when transported, compared with normal, full-term calves”.

**Liveweight**

AMIC DPI&W TAS recommends breed specific target live weights be re-adopted as per the current calf NVD.

**Loading density**

AMIC supports the adoption of NZ or Tasmanian standards. AA, DPI Vic, RSPCA Australia, AACT, AL SA supports the need for space to lie down and have proposed from GB4.11.

GB4.11—Calves under one month old should have sufficient space to lie down on their sternum.

SA4.x “Calves under 30 days old must all have sufficient space in the livestock crate to all lie down on their sternum.”

NSW DPI also supports this provision. DPI Vic propose the following based on FAWC formula (sd = 0.021W0.67). It must be noted that formatting problems may have hidden the data for the 100, 150 & 200 kg categories. From GB4.10;
### Additional provisions

AA believes that there should be sufficient space for all calves to lie down on a bedding to assist with thermal regulation and comfort. DPI Vic, RSPCA Australia, AACT, AL SA also recommend bedding and have proposed the following clause from GB4.12, somewhat covered by other standards (SA3.1, SA5.14, SB4.5) and is not recommended. CIWF supports the provision of bedding:

**GB4.12** Calves less than 30 days old should have:

- protection from excess heat, sun, wind and rain in a vehicle with an enclosed front and that provides effective ventilation.

**SB4.5 xx** “Calves less than 30 days old must have protection from excess heat, sun, wind and rain in a vehicle with an enclosed front and that provides effective ventilation”

DPI Vic propose the clause; “*be kept clean and dry.*”

PACAT recommend that dogs are not used on calves under 6 months old. The current standard SB4.7 relates to the bobby calf age group (to 30 days old) and is thought to be adequate. A guideline is proposed.

**GB4.x** “Dogs should not be used on calves under 6 months old”

AL SA recommends:

**SB4.X** “Scouring calves must not be transported.”

This proposal is more aligned and realistic as a guideline which is already covered by GB4.2.

### SB4.4 calves less than 5 days old

It is proposed to delete the reference to colostrum feeding as it is not relevant to transport and may take place after transport for this age group of calves only permitted to travel to calf

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<table>
<thead>
<tr>
<th>Mean liveweight (kg)</th>
<th>Minimum floor area (m²/head)</th>
<th>Number of head per 12.2 m bottom deck</th>
</tr>
</thead>
<tbody>
<tr>
<td>23</td>
<td></td>
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<tr>
<td>30</td>
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<td>0.31</td>
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<td>0.42</td>
<td>70</td>
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<td>200</td>
<td>0.53</td>
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<tr>
<td>250</td>
<td>0.77</td>
<td>38</td>
</tr>
<tr>
<td>300</td>
<td>0.86</td>
<td>34</td>
</tr>
</tbody>
</table>
rearing establishments.

**SB4.4** Calves less than 5 days old travelling without mothers must only be transported directly to a calf-rearing facility and must:

- i) be fed colostrum on the property of origin
- ii) be fed a liquid feed within 6 hours before loading
- iii) be provided with thick bedding and room to lie down
- iv) be protected from cold and heat
- v) not be consigned through saleyards
- vi) not be transported for longer than 6 hours.

**Actions**

The following proposals are recommended for consideration and the following amendments were agreed by the majority of the Reference Group:

**SB4.4** Bobby calves less than 5 days old travelling without mothers must only be transported directly to a calf-rearing facility and must:

- vii) be fed colostrum on the property of origin
- i) be fed a liquid feed within 6 hours before loading
- ii) be provided with thick bedding and room to lie down
- iii) be protected from cold and heat
- iv) not be consigned through saleyards
- v) not be transported for longer than 6 hours.

The following bobby calf fitness standard **SB4.5** is proposed for adoption, incorporating relevant suggestions:

**SB4.5** Bobby calves between 5 and 30 days old travelling without mothers must:

- i) be protected from cold and heat
- ii) be in good health, alert and able to rise from a lying position
- iii) have been adequately fed milk or milk replacer on the farm within 6 hours of transport
- iv) be prepared and transported to ensure a time delivery in less than 18 hours from last feed, with no more than 12 hours spent on transports between feeds of not more than X18 hours
- iv) have an auditable and accessible record system that identifies that the calves were fed within 6 hours of transport unless the journey is between rearing properties and is less than 6 hours duration
- iv) be transported for less than X hours or X kilometres (the interval from
farm to abattoir not exceed X hours or X kilometres). This point was deleted as it is felt that it is covered by point 4.

Changes that are not supported and the justifications are:

1. have a navel cord which is wrinkled, withered and shrivelled and not pink or red coloured, raw or fleshy. Relevant as a guideline GB4.4, GB4.12, not a reliable animal welfare indicator as a standard

2. have hooves that are firm and worn flat and not bulbous with soft unworn tissue. Relevant as a new guideline GB4.12, not a reliable animal welfare indicator for a standard

3. have been fed on colostrum. Not relevant for transport.

3-4. have an auditable and accessible record that identifies the date and time that the calves were last fed, unless the journey is between rearing properties and is less than 6 hours duration. The Dairy Industry proposes that this mechanism is no longer relevant in the context of the feeding within 6 hours of transport requirement, but it is the basis of a new guideline in GB4.12.5 See above.SB4

4-5. be kept clean and dry. Relevant as a new guideline in GB4.12.

5-6. be provided with bedding. Relevant as a new guideline in GB4.12.

7. be of minimum liveweight of 23 kg. Relevant as a new guideline with additional breed recommendations in GB4.12.

8. be strong enough to withstand the stress of travel. Relevant as a new guideline but not really supported as too general a statement and covered by SA4.1, no further action required.

9. be not obviously diseased, not malformed, blind or disabled. Relevant health aspects covered by SA4.1, no further action required.

6. be transported for less than 500 km in a 24 hour period. Relevant as a guideline GB4.3 in GB4.3 changed. be transported directly to the nearest available, operating abattoir. Relevant as a guideline GB4.3 in place. GB4.3 changed.

It is believed that there is plausible anecdotal evidence that 6-7 day old calves are easier to handle in transport and at abattoirs. Relevant stakeholders will work together to achieve better livestock welfare outcomes for the bobby calf trade incorporating relevant science and industry knowledge. It is expected that at some time in future years this issue may be further considered in the context of a revision of the standards and guidelines.

SB4.7 “Bobby calves born earlier than a normal pregnancy term (including induced calves) must be at an equivalent stage of fitness when transported, compared with normal, full-term calves”.

SB4.8 “Bobby calves under 30 days old must all have sufficient space in the
livestock crate to all lie down on their sternums”.

**GB4.940**

<table>
<thead>
<tr>
<th>Mean liveweight (kg)</th>
<th>Minimum floor area (m²/head) standing</th>
<th>Number of head per 12.25 m bottom X 2.4m deck</th>
<th>Minimum floor area (m²/head) lying</th>
<th>Number of head per 12.5 m X 2.4m deck</th>
</tr>
</thead>
<tbody>
<tr>
<td>23</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>30</td>
<td></td>
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<tr>
<td>100</td>
<td>0.31</td>
<td>94</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Calf loading densities deleted from GB4.10 as agreement could not be reached and there are no MCOP provisions. Post SRG7 a working group agreed that the nominal loading densities for an average 40 kg calf line to stand only or all lie down are; 0.24m² or 0.33m² per calf, respectively. At the 0.24m² density there will be room for some calves to lie down. The RIS quotes an average of 30kg, 130 calves per 30m² deck (0.23m²/calf) as the average industry practice (table A5.29). Whilst the average weight is likely to be too low, the rest of the data is thought to be right and will not be altered as there is no better and more reliable industry data.

GB4.11 deleted as a consequence of the new standard for calf loading density above.

**GB4.102.** **Bobby** calves less than 30 days old to be transported should:

i) have protection from excess heat, sun, wind and rain in a vehicle with an enclosed front and that provides effective ventilation.

ii) be kept clean and dry

iii) have bedding.

iv) be of minimum liveweight of 23 kg

v) have hooves that are firm and worn flat and not bulbous with soft unworn tissue

vi) have a navel cord which is wrinkled, withered and shrivelled and not pink or red coloured, raw or fleshy

vii) have an auditable and accessible record that identifies the date and time that the calves were last fed, unless the journey is between rearing properties and is less than 6 hours duration

**GB4.16** “Dogs should not be used on bobby calves under 6 months old”.

Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock - Public Consultation Response Action Plan
Proposed minor changes:

<table>
<thead>
<tr>
<th>SB4.1</th>
<th>Time off water must not exceed the time periods given below:</th>
<th>Preference for 30 days definition of calf age. Consistency.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Class</strong></td>
<td><strong>Maximum time off water (hours)</strong></td>
</tr>
<tr>
<td></td>
<td>Cattle over 6 months old</td>
<td>48</td>
</tr>
<tr>
<td></td>
<td><em>Bobby</em> calves 1–30 days – 6 months old</td>
<td>24</td>
</tr>
<tr>
<td></td>
<td>Lactating cows with calves at foot</td>
<td>24</td>
</tr>
<tr>
<td></td>
<td><em>Bobby</em> Calves 5–30 days old travelling without mothers</td>
<td>18</td>
</tr>
<tr>
<td></td>
<td>Cattle known to be more than 6 months pregnant excluding</td>
<td>24</td>
</tr>
<tr>
<td></td>
<td>the last 4 weeks</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SB4.4,</td>
<td>The word “Bobby” will be added before ‘calves’ to</td>
<td>Time off water not relevant.</td>
</tr>
<tr>
<td>SB4.5,</td>
<td>emphasise the definition of ‘bobby calf’, as opposed to</td>
<td></td>
</tr>
<tr>
<td>SB4.6</td>
<td>cows and calves travelling where the calf might be</td>
<td></td>
</tr>
<tr>
<td></td>
<td>temporarily separated in a separate pen. The standards do</td>
<td></td>
</tr>
<tr>
<td></td>
<td>not apply to the latter situation.</td>
<td></td>
</tr>
<tr>
<td>GB4.3</td>
<td>Calves should be transported for the shortest time</td>
<td>Clarification</td>
</tr>
<tr>
<td></td>
<td>possible. Efficient aggregation practices for <em>bobby</em></td>
<td></td>
</tr>
<tr>
<td></td>
<td>calves between 5 and 30 days old should be used to</td>
<td></td>
</tr>
<tr>
<td></td>
<td>reduce journey times to final destinations. Direct</td>
<td></td>
</tr>
<tr>
<td></td>
<td>marketing should be used when possible. Calves should</td>
<td></td>
</tr>
<tr>
<td></td>
<td>not be consigned through saleyards that do not have</td>
<td></td>
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<tr>
<td></td>
<td>holding facilities suitable for calves. They should</td>
<td></td>
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<tr>
<td></td>
<td>not be transported for a time exceeding 10 hours, or</td>
<td></td>
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<tr>
<td></td>
<td>a distance exceeding 500 kilometres — whichever comes</td>
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<tr>
<td></td>
<td>first — from loading to the destination, unless the calves</td>
<td></td>
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<tr>
<td></td>
<td>are intended for slaughter and exceeding this time and</td>
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<tr>
<td></td>
<td>distance is necessary to reach the nearest available,</td>
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<tr>
<td></td>
<td>operating livestock-processing establishment. <em>Where</em></td>
<td></td>
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<tr>
<td></td>
<td>possible, calves should be sent to the nearest available,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>operating livestock-processing establishment.*</td>
<td></td>
</tr>
<tr>
<td>GB4.84</td>
<td>Calves between 5 and 30 days old travelling without</td>
<td>Dairy industry, VFF proposes deletion as the indicators are</td>
</tr>
<tr>
<td></td>
<td>mothers should have dry, withered navel cords and hooves</td>
<td>too imprecise and the age/time recommendation may cause</td>
</tr>
<tr>
<td></td>
<td>that are not soft and bulbous. They should not travel</td>
<td>confusion with proposed standards.</td>
</tr>
<tr>
<td></td>
<td>until they are 8 days old for journeys approaching 24</td>
<td></td>
</tr>
<tr>
<td></td>
<td>hours.</td>
<td></td>
</tr>
</tbody>
</table>
Consequential changes to B4 guidelines were made at the conclusion of the process to adoption correct terminology and remove conflicts.

Electric prodder standards are discussed separately.

**Cattle**

**Background**

The interests of cattle have been well represented by a suite of stakeholders in the majority of the Reference Group. As a major species cattle have been at the forefront of many discussions on appropriate standards and guidelines. Cattle are generally regarded as a robust species and there have been few submissions. Bobby calf (less than 30 days old), time off water and spelling issues have been considered separately in this report.

**Submissions**

**SB4.4 Bobby Calves < 5 days.** This standard is in place to protect the welfare of calves transported directly to calf rearing enterprises. PACAT recommend that the journey limit is 2 hours and be only after have a navel cord which is wrinkled, withered and shrivelled and not pink or red coloured, raw or fleshy and the hooves are firm and worn flat and not bulbous with soft unworn tissue. AL Qld does not support this standard. A Angels are opposed to the transport of any calves before the umbilicus is fully healed (>5daysold), and require calves to fed within 3 hours, transported for less than 4 hours and in a temperature range of 15 – 30 degrees. This proposal would make SB4.4 redundant. Special provisions are in place to protect the welfare of these calves. No further changes are recommended.

Dairy industry, VFF proposes deletion of the last sentence in GB4.14 as the sentence is too prescriptive. The 20 degrees figure has been taken from the Land Transport of Cattle code.

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| GB4.11 | Calves under one month of age should have sufficient space to lie down on their sternum. | Fitness part of the guideline remains as GB4.10.  |
| GB4.15 | Calves between 5 and 30 days old travelling to livestock processing plants should be delivered within 10 hours of leaving the property of origin. | New standard replaces this guideline.  |

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GB4.124 Ramps for adult cattle and calves should be designed so that animal welfare is not compromised. Ramp slopes for adult cattle should be 20 degrees and
for calves should be 12 degrees.

**Action**

time off water, contingency extensions, spelling, electric prodder and dog issues have been considered separately in this report. The following amendments were agreed by the majority of the Reference Group.

SB 4.8 to become a guideline as shown below.

A clarification is proposed to GB4.7:

<table>
<thead>
<tr>
<th>GB4.67</th>
<th>Cows more than 8 months pregnant, excluding the last two weeks of pregnancy, should be transported under the following provisions:</th>
</tr>
</thead>
<tbody>
<tr>
<td>i)</td>
<td>water deprivation time should not exceed 4 hours</td>
</tr>
<tr>
<td>ii)</td>
<td>feed and water should be provided immediately before loading and upon unloading</td>
</tr>
<tr>
<td>iii)</td>
<td>additional space should be provided on the vehicle</td>
</tr>
<tr>
<td>iv)</td>
<td>cattle they should be segregated from other classes of cattle</td>
</tr>
<tr>
<td>v)</td>
<td>veterinary advice should be sought.</td>
</tr>
</tbody>
</table>

| GB4.124 | Ramps for adult cattle and calves should be designed so that animal welfare is not compromised. Ramp slopes for adult cattle should be 20 degrees and for calves should be 12 degrees. |

| GB4.20 | Cattle should be bled out using the chest stick method in preference to slitting the throat (neck cut). |

**Recommendation**

by AHA based on physiology of cattle.

<table>
<thead>
<tr>
<th>GB4.179</th>
<th>Recommended methods of humane destruction include:</th>
</tr>
</thead>
<tbody>
<tr>
<td>i)</td>
<td>For adult cattle are firearms (including the temporal position) or captive bolt</td>
</tr>
<tr>
<td>ii)</td>
<td>For calves are firearms, captive bolt, or blunt trauma; blunt trauma must only be used when there is no other approved option for humane destruction, and only on calves that are less than 24 hours old.</td>
</tr>
</tbody>
</table>

Position A & B for firearms and captive bolt, position C for firearms only.

**Correction**

| GB4.940 | The following space allowances should be provided: |

Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock - Public Consultation Response Action Plan - Page 93
<table>
<thead>
<tr>
<th>Mean liveweight (kg)</th>
<th>Minimum floor area (m²/head)</th>
<th>Number of head per 12.25 m x 2.4m bottom-deck</th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
<td></td>
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<tr>
<td>150</td>
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<tr>
<td>200</td>
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<tr>
<td>250</td>
<td>0.77</td>
<td>38</td>
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<tr>
<td>300</td>
<td>0.86</td>
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<td>0.98</td>
<td>30</td>
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<td>1.05</td>
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<td>550</td>
<td>1.34</td>
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<tr>
<td>600</td>
<td>1.47</td>
<td>20</td>
</tr>
<tr>
<td>650</td>
<td>1.63</td>
<td>18</td>
</tr>
</tbody>
</table>

GB4.6 to be worded to cover pregnancy for 8 months and beyond in section GB4.5

GB4.5 Cows in the sixth and seventh month of pregnancy should not be deprived of water for more than 12 hours and they should be spelled for 12 hours before reloading.

GB4.6 Cows in their eighth month of pregnancy or later, excluding the last two weeks of pregnancy, should be transported under the following provisions:

i) water deprivation time should not exceed 4 hours
ii) feed and water should be provided immediately before loading and upon unloading
iii) additional space should be provided on the vehicle
iv) they should be segregated from other classes of cattle
v) veterinary advice should be sought.

Deer

Background
The Deer Industry Association Australia (DIAA) are the main contributors to the deer chapter but have not participated directly in Reference Group meetings. The DIAA whilst not large has formed useful industry reference documents through the Rural Industries Research and Development Corporation (RIRDC) including the “Deer Transport – Best Practice Manual” Publication No.01/094 June 2001. The deer industry is diverse with a variety of different breeds represented – this creates minor issues with adoption of standard terms for males, females and young deer.
Submissions

Time of water, spelling and electric prodder use is captured in the sections on these issues.

RSPCA Victoria proposes that GB5.2 should be a standard. This change is not recommended as per the discussion on SA4.1 Fitness as follows “Similar guidelines exist for all species covered and the intention of the guidelines is that the sub optimal health conditions mentioned are amongst those that might be considered in the decision making process for assessing risk to the welfare of livestock for an intended journey. SA 4.1 has aspects that are general and non-prescriptive and in any case health assessment requires competency. Where the livestock fitness for an intended journey is judged or assessed to be not fit, an appropriate veterinarian must be consulted for advice (SA4.2) if it is desired to transport the livestock. Where there is doubt about the level of livestock fitness for an intended journey an appropriate veterinarian should be consulted for advice (GA5.19, GA5.38)”:

GB5.2—Conditions that could cause deer welfare to decline during transport and should be considered unfit for transport might include lethargic deer and deer with profuse diarrhoea, disease, wounds or abscesses. A decision to transport a deer with the above conditions should be made after considering the welfare of the animal concerned and the treatment and management options.

GB5.2—Conditions that could cause deer welfare to decline during transport and must be considered unfit for transport might include lethargic deer and deer with profuse diarrhoea, disease, wounds or abscesses.

RSPCA Australia, DIAA has a number of recommendations to make for deer. A Angels also support these proposals. From GB5.3:

GB5.3—Deer with antlers in velvet greater than 4 cm should not be transported. Deer should not be transported for 7 days after velvet antler removal.

SB5.X “Deer with antlers in velvet greater than 4 cm must not be transported. Deer must not be transported for 7 days after velvet antler removal.”

From GB5.4

GB5.4—Deer with hard antlers greater than 4 cm should not be transported. Where hard antler removal cannot be done, they must be separated from all other deer.

SB5.X “Deer with hard antlers greater than 4 cm must not be transported. Where hard antler removal cannot be done, they must be separated from all other deer.”

DIAA propose that bleeding out without stunning is a last resort humane destruction option.

SB5.5 Approved methods of humane destruction for:

i) deer are firearms captive bolt or lethal injection or severing neck blood vessels as a last resort if no firearm or captive bolt is available.
ii) fawns are firearms, captive bolt, lethal injection or blunt trauma or severing neck blood vessels; blunt trauma or severing neck blood vessels must only be used for fawns that are less than 24 hours old and where there is no firearm or captive bolt available.

AL Qld recommend the following higher standard from GB5.5, this would make SB5.3 redundant also. A Angels also support this proposal adding ‘if they have been weaned in the past 10 days’:

GB5.5 Deer that are due to calve within one month or with young at foot (less than one month old) should not be transported unless in an emergency for the welfare of the deer, and special provisions (as advised by a veterinarian) are in place to ensure that transport does not result in adverse welfare outcomes.

SB5.X “Deer that are due to calve within one month, or with young at foot less than 30 days old, must not be transported unless in an emergency for the welfare of the deer, and under veterinary advice.”

RSPCA Australia from GB5.9:

GB5.9 Deer are particularly susceptible to heat stress. A supply of suitable water should be provided before loading.

SB5.X “A supply of suitable water must be provided to deer until before loading.”

DIAA recommend that GB5.10 is modified with new data:

GB5.10 The following space allowances should be provided:

<table>
<thead>
<tr>
<th>Deer weight range</th>
<th>Floor area per animal (m²)</th>
</tr>
</thead>
<tbody>
<tr>
<td>50 kg</td>
<td>0.25 0.3</td>
</tr>
<tr>
<td>75 kg</td>
<td>0.35 0.4</td>
</tr>
<tr>
<td>100 kg</td>
<td>0.4 0.5</td>
</tr>
<tr>
<td>150 kg</td>
<td>0.72 0.75</td>
</tr>
<tr>
<td>200 kg</td>
<td>0.96 1.0</td>
</tr>
</tbody>
</table>

DIAA recommend that GB5.12 is modified with the inclusion of the words:

GB5.12 Only fit and healthy animals should be selected for transport. Those most susceptible to stress or injury during transport should be loaded last, and unloaded first. When loading the vehicle, deer of different species and category should be penned separately to avoid injury or aggression towards each other.

DIAA recommend that GB5.13 is modified with the inclusion of the words:

GB5.13 Deer should be transported in crates that are fully sided with sufficient gaps for ventilation, and that have high side walls to prevent deer escaping and provide sufficient vertical clearance. Where weather requires, tarp or shade cloth should cover the vehicle front and roof; otherwise a transport vehicle
that is fully enclosed should be used. Single animal crates should be darkened and light entry should be at low levels. Crates should be of sufficient height so that deer have good head clearance and air moves freely through the crate. A cover is essential in any vehicle used to transport deer.

RSPCA Victoria proposes that GB5.14 should be a standard:

**GB5.14** Transporting deer during extremely hot weather (above 35°C) should be avoided, especially if deer are unaccustomed. If the deer show signs of heat stress or dehydration (panting, dry mouth, reduced response to normal stimuli) the crate should be placed in the shade or the deer hosed with water. The temperature in the crate should not exceed 30°C.

**GB5.164** Transporting deer during extremely hot weather (above 35°C) must be avoided, especially if deer are unaccustomed. If the deer show signs of heat stress or dehydration (panting, dry mouth, reduced response to normal stimuli) the crate must be placed in the shade or the deer hosed with water. The temperature in the crate must not exceed 30°C.

**Actions**

Time off water, contingency extensions and spelling issues has been considered separately in this report, a change has been made to SB5.3 to include lactating deer and young. The following amendments were agreed by the majority of the Reference Group. As proposed, with no guideline replacement:

**SB5.3** “Deer with antlers in velvet greater than 4 cm must not be transported. Deer must not be transported for 7 days after velvet antler removal.”

Modified to capture the correct intention with no guideline replacement:

**SB5.4** “Where hard antler removal cannot be done, deer with hard antlers greater than 4 cm must not be transported, unless they are separated from all other deer and have adequate clearance above the antlers.”

Humane destruction modified to be in line with goats and sheep.

**SBG5.20518** Appro Recommended methods of humane destruction include for:

i) For deer over 6 months old are firearm, captive bolt, lethal injection or bleeding out; bleeding out by neck cut must be done only by a competent operator and in situations where there is no firearm or captive bolt available.

ii) For fawns / calves are firearm, captive bolt, lethal injection, bleeding out or blunt trauma; bleeding out by neck cut must be done only by a competent operator and in situations where there is no firearm or captive bolt available; Note blunt trauma must only be used for fawns / calves that are less than 24 hours old and where there is no firearm or captive bolt available.
GB5.2 to remain as the intention of this guideline to recommend that health conditions that may not preclude an animal from currently being fit should still be considered in the animal’s welfare interests. Standards relating to fitness are considered sufficient.

GB5.5 to remain as it is not an essential standard for deer or similarly in any other species. Standards relating to pregnancy are considered sufficient.

GB5.9 to remain as it is not an essential standard for deer or similarly in any other species. Standards relating to water provision are considered sufficient.

GB5.10 The following space allowances should be provided:

<table>
<thead>
<tr>
<th>Deer weight range</th>
<th>Floor area per animal (m²)</th>
<th>Number of head per 12.5 m x 2.4m deck</th>
</tr>
</thead>
<tbody>
<tr>
<td>50 kg</td>
<td>0.3</td>
<td>100</td>
</tr>
<tr>
<td>75 kg</td>
<td>0.4</td>
<td>75</td>
</tr>
<tr>
<td>100 kg</td>
<td>0.5</td>
<td>60</td>
</tr>
<tr>
<td>150 kg</td>
<td>0.75</td>
<td>40</td>
</tr>
<tr>
<td>200 kg</td>
<td>1.0</td>
<td>30</td>
</tr>
</tbody>
</table>

GB5.15 Only fit and healthy animals should be selected for transport. Those most susceptible to stress or injury during transport should be loaded last, and unloaded first. When loading the vehicle, deer of different species and category should be penned separately to avoid injury or aggression towards each other.

GB5.13 Deer should be transported in crates that are fully sided with sufficient gaps for ventilation. Crates should be of sufficient height so that deer have good head clearance and air moves freely through the crate. A cover is essential in any vehicle used to transport deer.

GB5.14 to remain as it is not an essential standard for deer or similarly in any other species. Standards relating to hot conditions are considered sufficient.

Time of water and electric prodder use is captured in the section on this issue.

Emu & Ostrich

Background
It has been difficult to establish contact with bird owners for these minority species. Aspects of the poultry chapter have been adapted for emus and ostrich as relevant. Recently contact has been established with the Australian Ostrich Association (AOA) and a late submission is accepted to address deficiencies in the transport of chicks, cage densities,
curfew recommendations, and etcetera. There are three main transporters of birds and one main exporter.

**Submissions**

The AOA advise that the time off water limits should be 36 and 24 hours for mature birds and chicks over 4 days old respectively. Furthermore the situation for the management of chicks to four days old is the same as for poultry in that they rely upon their yolk sacks for nourishment. Subsequent changes then have to be made to SB6.1, SB6.2, SB6.3 and SB6.4. AOA also point out that the note under the standards is incorrect and that birds are not watered in transport apart from cooling water sprays in hot conditions and that they are not fed at meat processing establishments. AOA make the following requests for change in the guidelines.

GB6.5  
Ratites should be fed and watered as soon as possible after unloading. Food is not recommended at meat processing establishments.

GB6.9  
Chicks up to 12 weeks old should be transported in groups of no more than 230 birds with partitions placed between adjacent groups.

GB6.10  
Juvenile and Adult birds should be transported in groups of no more than 172 birds with partitions placed between adjacent groups.

GB6.11  
The following minimum space allowances should be provided:

<table>
<thead>
<tr>
<th>Emus (age in months)</th>
<th>Minimum space per bird (m²)*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 2</td>
<td>0.160–0.4421</td>
</tr>
<tr>
<td>2–4</td>
<td>0.4421</td>
</tr>
<tr>
<td>4–6</td>
<td>0.4723</td>
</tr>
<tr>
<td>6–9</td>
<td>0.5326</td>
</tr>
<tr>
<td>9–12</td>
<td>0.6432</td>
</tr>
<tr>
<td>12–14</td>
<td>0.7638</td>
</tr>
<tr>
<td>More than 14</td>
<td>0.841</td>
</tr>
</tbody>
</table>

For Ostriches:

<table>
<thead>
<tr>
<th>Ostrich (weight in kg)</th>
<th>Minimum space per bird (m²)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Day old</td>
<td>0.10</td>
</tr>
<tr>
<td>35</td>
<td>0.19</td>
</tr>
<tr>
<td>95</td>
<td>0.41</td>
</tr>
<tr>
<td>&gt;110</td>
<td>0.48</td>
</tr>
</tbody>
</table>

*Space allowance for ostriches remains to be developed; chicks may be transported in small groups of 1–6 birds per crate (0.75 m²); juvenile birds (ostriches) should be transported at 0.57 m² per bird.

GB6.14  
Yards should contain adequate shade to prevent sunburn and skin damage heat stress and feeding or watering facilities should be well positioned off the ground with adequate space to avoid aggression between birds. Where possible, misters should also be available.
GB6.15 Ratites should be conditioned to use yards on a monthly basis at least 6 months before being assembled for transport and avoid stress during herding.

GB6.18 Ramp slopes should be no more than 25 degrees.

GB6.19 Transport vehicles should have a nonslip, moisture-absorbing draining floor coverings (ie sand, sawdust or wood shavings) to ensure birds maintain footing during transport. Bedding that can be ingested is not recommended for chicks less than 3 weeks old.

Containers SB6.5. DAFWA believe that this standard is not verifiable and recommends that it be a guideline.

RSPCA Australia, RSPCA Vic have a number of recommendations to make for ratites. It is not believed that these recommendations should be standards:

From GB6.9:

Chicks up to 12 weeks old must be transported in groups of no more than 20 birds with partitions placed between adjacent groups.

From GB6.10:

Juvenile and adult birds must be transported in groups of no more than 12 birds with partitions placed between adjacent groups.

RSPCA Australia has requested that GB6.6 be incorporated based on the Emu MCOP 2006 and ostrich MCOP 2003 that states Ratites chicks should be brooded within 24 hours of hatching.

From GB6.24 note – a new definition is proposed:

Time spent in containers for chicks must be calculated from the time of placement into the container, not the time transport begins.

The revised journey time definition in the time off water will take this into account.

RSPCA Australia do not support the use of shotguns for close range shooting (GB6.30) and recommend the use of a heart shot with a centre fire rifle, this is contrary to previous Reference Group discussions.

PACAT recommend the following:

SB6.x Ratites must only be picked up by supporting the body.

SB6.x Ratites must be transported in very dimly lit conditions.

SB6.x Ratites must be transported at night.
The recommendations are probably more suited as guidelines. SA5.6 covers handling adequately.

QDPI have requested a clarification to GB6.4.

**GB6.4** Records of birds found dead on arrival should be collected and maintained and the information communicated to the consignor and transporter.

NSW DPI proposes a new guideline for handling:

**GB6.X** Experienced handlers can use the wings and pressure on the rump to help guide emus. Care should be taken with handling by the wings as the limbs are easily damaged.

**Actions**

New standards are recommended. The following amendments were agreed by the majority of the Reference Group.

**SB6.1** Time off water must not exceed the time periods given below:

<table>
<thead>
<tr>
<th>Class</th>
<th>Maximum time off water (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult birds</td>
<td>24 36</td>
</tr>
<tr>
<td>Chicks or young birds day</td>
<td>42 24</td>
</tr>
<tr>
<td>5 to 90</td>
<td>60+ following take off b</td>
</tr>
<tr>
<td>Chicks up to 4 day old</td>
<td></td>
</tr>
</tbody>
</table>

a—Normal allowable time off water is 72 hours, allowing 12 hours for hatching time before removal (take off) from the hatchery.

b—Water deprivation time allowed can be up to 72 hours following take-off if provided with hydrating material in the transport container.

**SB6.2** Ratites must be fed every 24 hours including within the 24 hours before assembly for transport.

**SB6.43** Chicks and Young birds must be fed every 12 hours.

**SB6.54** If adult birds have been off water of 24 36 hours, they must be spelled for 4 hours before starting another journey.

A generic change to SB6.8 has been requested by the Reference Group.

**SGB6.36830** Approve **Recommended** methods for humane destruction for include:

i) *For adult birds* are a firearm, or sedation followed by captive bolt or decapitation

ii) *ii) For ratite chicks Young birds* is stunning by blunt trauma followed by decapitation or bleeding out with a sharp instrument, such as a machete.
Note
Generally, ratites are watered on transport vehicles. Unloading for spells should be avoided for welfare and biosecurity reasons. However, spells longer than 4 hours can be deducted from the total water deprivation time. A spell less than 4 hours is not recommended or recognised for water deprivation time calculation, but can be taken as necessary.

The following three amendments made by the Reference Group for poultry will also be applied to ratites.

SB10.8 “The transporter must take reasonable action to minimise the risk to the welfare of chicks from chilling and overheating and chicks must be placed in a suitable brooding environment after arrival and within 72 hours of take-off.” (Take off means when hatched chicks are removed from hatchery at up to 12 hours after hatching).

GB10.17 “Delays in transport should be minimised for chicks.”

GB10.18 “Chicks which cannot be brooded within 72 hours of take-off should be humanely destroyed.”

Guideline proposals supported are as follows:

GB6.54 Records of birds found dead on arrival should be collected and maintained and the information communicated to the consignor and transporter.

GB6.65 Ratites should be fed and watered as soon as possible after unloading. Food is not recommended at meat processing establishments.

GB6.8 Ratites chicks should be brooded within 24 hours of hatching.

GB6.129 Chicks up to 12 weeks old should be transported in groups of no more than 230 birds with partitions placed between adjacent groups.

GB6.130 Juvenile and Adult birds should be transported in groups of no more than 172 birds with partitions placed between adjacent groups.
GB6.144 The following minimum space allowances should be provided:

<table>
<thead>
<tr>
<th>Emus (age in months)</th>
<th>Minimum space per bird (m²)¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 2</td>
<td>0.150–0.4321</td>
</tr>
<tr>
<td>2–4</td>
<td>0.4421</td>
</tr>
<tr>
<td>4–6</td>
<td>0.4723</td>
</tr>
<tr>
<td>6–9</td>
<td>0.5326</td>
</tr>
<tr>
<td>9–12</td>
<td>0.6432</td>
</tr>
<tr>
<td>12–14</td>
<td>0.7638</td>
</tr>
<tr>
<td>More than 14</td>
<td>0.841</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ostrich (weight in kg)</th>
<th>Minimum space per bird (m²)¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Day old</td>
<td>0.10</td>
</tr>
<tr>
<td>35</td>
<td>0.19</td>
</tr>
<tr>
<td>95</td>
<td>0.41</td>
</tr>
<tr>
<td>+110</td>
<td>0.48</td>
</tr>
</tbody>
</table>

¹ Space allowance for ostriches remains to be developed; chicks may be transported in small groups of 4–6 birds per crate (0.75 m²); juvenile birds (ostriches) should be transported at 0.57 m² per bird.

GB6.174 Yards should contain adequate shade to prevent sunburn and skin damage; heat stress and feeding or watering facilities should be well positioned off the ground with adequate space to avoid aggression between birds. Where possible, misters should also be available.

GB6.185 Ratites should be conditioned to use yards on a monthly basis at least 6 months before being assembled for transport and avoid stress during herding.

GB6.2248 Ramp slopes should be no more than 25 degrees.

GB6.2349 Transport vehicles should have a nonslip, moisture-absorbing draining floor coverings (ie sand, sawdust or wood shavings) to ensure birds maintain footing during transport. Bedding that can be ingested is not recommended for chicks less than 3 weeks old.

GB6.34 Experienced handlers can use the wings and pressure on the rump to help guide emus. Care should be taken with handling by the wings as the limbs are easily damaged.

GB6.35 Ratites should only be picked up by supporting the body.

GB6.21 Ratites should be transported in very dimly lit conditions or at night.
An additional fitness guideline is proposed in relation to time off water in that section – repeated below.

**GB6.7** Additional considerations for bird welfare should be made for long distance duration travel:

- for birds after 24 hours off water
- for young birds 5 to 90 days old after 18 hours off water

These considerations should include:

i) that the birds are fit for the remainder of the intended journey

ii) adverse hot weather conditions are not prevailing or predicted

iii) a longer spell time at the end of the journey

iv) the recent management of the birds before first loading.

**Goats**

**Background**

The goat industry has been effectively represented at the Reference Group. Standards and guidelines for goats are adapted as relevant from those of sheep. Time off water, contingency extensions and spelling issues have been considered separately in this report.

**Submissions**

DPI Vic propose that GB7.5, GB7.6, GB7.9, GB7.10, GB7.22 are developed into a standards. The issue of replacement guidelines has not been considered:

**GB7.5** “Goats to be transported longer than 24 hours should must be fed and watered within 5 hours before loading.”

**GB7.6** Between mustering and loading, water and feed should must be provided for goats if:

i) goats are to remain in the yards for more than 24 hours

ii) goats are expected to be off water for 24 hours or more during travel

iii) goats are weak, wet, pregnant or with kids at foot

iv) goats are fatigued from mustering, have been mustered over a long distance from pastoral country, or have been mustered by helicopter.

**GB7.9** Goats in the third trimester of pregnancy, lactating goats and kids younger than 7 days should must not be deprived of water for more than 12
hours. They should must be provided with food and water upon arrival and should must be spelled for at least 12 hours before starting another journey.”

**GB7.10** SB7.x “Goats more than 4 months pregnant should must be transported under the following conditions:

i) water deprivation time should must not exceed 8 hours

ii) feed and water should must be provided immediately before loading and upon unloading

iii) additional space should must be provided on the vehicle

iv) different classes of goats should must be segregated

v) veterinary advice must be sought.

**GB7.22** SB7.x “Electric prodders should must not be used on pregnant goats.”

A Angels also propose most of the above and further recommend that goats in the last 4 weeks of pregnancy or kids under 10 days old must not be transported. These submissions go against the grain of considerable Reference Group deliberations and it is felt that the guidelines are not suitable as standards. No change is recommended to feed and water standards.

PACAT support the conversion of GB7.8 into a standard and NSW FA support deletion on the basis of not being practical to maintain feral goats in paddocks. On balance it is recommended that the proposed change to GB7.8 shown below is considered.

**GB7.8** ‘Unmanaged goats should must be kept in yards or paddocks for at least 3–4 days, and should be drafted and fed water and hay so that they become accustomed to lot-feeding before transport to a feedlot or depot.”

RSPCA Vic wish to see the loading density table GB7.122 incorporated into the standards but there is no more justification doing this for goats than the other species.

**Action**

Time off water, contingency extensions and spelling issues has been considered separately in this report. The proposed standards required further consideration. The following amendments were agreed by the majority of the Reference Group.

**SB7.3** “Electric prodders must not be used on pregnant goats known to be pregnant.”

**GB7.22** to be deleted.

**SB7.22** Recommended methods of humane destruction for include:

*For goats over 6 months old are firearm, captive bolt.*

Proposed by WPA, VFF to highlight important of
lethal injection or bleeding out; bleeding out by neck cut must be done only by a competent operator or under the direct supervision of a competent operator and in situations where there is no firearm or captive bolt available

For kids are firearm, captive bolt, lethal injection, bleeding out or blunt trauma; bleeding out by neck cut must be done only by a competent operator or under the direct supervision of a competent operator and in situations where there is no firearm or captive bolt available; blunt trauma must only be used for kids that are less than 24 hours old and where there is no firearm or captive bolt available.

The following minor changes are recommended:

<table>
<thead>
<tr>
<th>GB7.4</th>
<th>All goats — particularly wet lactating and weak goats — should be fed dry hay or fibre before transport, allowing for curfew periods as appropriate, to sustain them for the journey.</th>
<th>Recommended by QDPI — to clarify actual intended condition.</th>
</tr>
</thead>
<tbody>
<tr>
<td>GB7.6</td>
<td>Between mustering and loading, water and feed should be provided for goats if:</td>
<td>As above, after search of document</td>
</tr>
<tr>
<td></td>
<td>• goats are to remain in the yards for more than 24 hours</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• goats are expected to be off water for 24 hours or more during travel</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• goats are weak, wet lactating, pregnant or with kids at foot</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• goats are fatigued from mustering, have been mustered over a long distance duration from pastoral country, or have been mustered by helicopter.</td>
<td></td>
</tr>
<tr>
<td>GB7.8</td>
<td>Unmanaged goats should be kept in yards or paddocks for at least 3–4 days, and should be drafted and fed water and hay so that they become accustomed to lot-feeding before transport to a feedlot or depot</td>
<td>clarification</td>
</tr>
</tbody>
</table>

Additional detail

GB7.12 The following space allowances should be provided:
Horses

Background
Effective consultation has occurred with the equine industry representatives, not-withstanding the equine influenza response. The horse industry is very diverse across all sectors from high value recreational to commercial slaughter for meat and the standards and guidelines seek to cover all aspects.

Submissions
A Angels do not support the transport of any foal under 2 weeks old.

DPI Vic propose the following clarifications to SB8.2:

SB8.2 Journey time may be extended for horses to 36 hours only under the following conditions:

i) horses must be watered and fed on the vehicle every 5 hours

ii) horses are not exposed to the natural elements

iii) there must be sufficient space of at least 700 mm wide and 2350 mm long per stall

iv) flooring must be suitable including drainage to remove urine

A Angels recommend that limit is 28 hours. The AHIC has raised a valid point that the variation in horse sizes does not lend credence to SB8.2 iii) and it may be better placed as a guideline.

A Angels do not support the transport of lame horses as in SB8.7. In relation to SB8.8 they wish to add that dividers are constructed so that heads and legs cannot become trapped.

Horse SA suggests that 2m clearance in SB8.10 is inadequate for larger breeds over 16 hands high and recommend 2.2m. RSPCA Australia request addition of the words “at least”.

SB8.10 “A vertical clearance of at least 2.2 m between the livestock crate floor and overhead structures must be provided in any vehicle used for horse transport.

<table>
<thead>
<tr>
<th>Mean liveweight (kg)</th>
<th>Minimum floor area (m²/head)</th>
<th>Number of head per 12.5 m x 2.4m deck</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>0.15</td>
<td>200</td>
</tr>
<tr>
<td>30</td>
<td>0.17</td>
<td>176</td>
</tr>
<tr>
<td>40</td>
<td>0.22</td>
<td>136</td>
</tr>
<tr>
<td>50</td>
<td>0.25</td>
<td>120</td>
</tr>
<tr>
<td>60</td>
<td>0.28</td>
<td>107</td>
</tr>
</tbody>
</table>
Horse SA and others recommends that SB8.11 be extended to cover all stallions. A Angels wish to add pregnant mares, mares with foals at foot, unbroken horses and horses with health conditions. It is felt that the current standard SA5.5 is adequate.

**SB8.11 Unbroken-Stallions must be segregated from other horse categories.**

If accepted will make GB8.22 redundant. The standard was created to specifically address the issue of feral stallions. It is considered that SA5.5 is a sufficient mandate for addressing other horse segregation issues as appropriate. No change to the standard is recommended but a revision of the guideline is possible as proposed below.

A Angels believe that dogs must not be used to move horses.

**GB8.232 All stallions should be segregated if they behave aggressively.**

DPI Vic propose that GB8.8 is developed into a standard as shown below, but this is not practical across the nation and will remain as guideline GB8.8:

**SB8.x “Adult horses should must be fed and watered every 5 hours and as soon as possible after unloading, with a suitable quality and quantity of feed and water to minimise colic risk.”**

The following new guideline has been proposed by Horse SA to improve lower limb and respiratory function:

**GB8.X “Horses should be unloaded during spells to allow exercise.”**

A Angels recommend that foals less than 2 weeks old are not transported.

A series of further minor changes are proposed to the guidelines by DPI Vic or Horse SA, these are all recommended below; a change directed towards consistency is in the proposed feeding and watering interval reduction from 8 to 5 hours in the guidelines.

**Action**

Time off water, contingency extensions and spelling issues have been considered separately in this report. The following proposals are recommended and the following amendments were agreed by the majority of the Reference Group.

**SB8.2 Journey time may be extended for horses to 36 hours only under the following conditions:**

- i) horses must be watered and fed on the vehicle every 5 hours
- ii) horses are not exposed to the natural elements
- iii) there must be sufficient space of 700 mm wide and 2350 mm long per stall to allow a comfortable standing position
- iv) flooring must be suitable including drainage to remove urine.

**GB8.13 “Stalls should be at least 700mm wide and 2350mm long to accommodate larger horses and those over 15 hands tall.”**
SB8.10 “A vertical clearance of at least 2.2 m between the livestock crate floor and overhead structures must be provided in any vehicle used for horse transport.”

SGB8.45320 The approved recommended methods for humane destruction of horses include:

i) For horses over 6 months old, a firearm aimed in the frontal position or lethal injection

ii) For foals under 6 months old, a firearm aimed in the frontal position or lethal injection.

GB8.232 All stallions should be segregated if they behave aggressively.

GB8.30 “Horses should be unloaded during spells to allow exercise.”

Additional minor changes are recommended:

GB8.1 Additional considerations for horse welfare should be made for long distance duration travel:

• for horses over 6 months old after 12 hours time off water
• for lactating mares after 8 hours time off water
• for foals under 6 months old after 8 hours off water
• for mares in the third trimester of pregnancy after 8.5 hours off water.

These considerations should include:

i) that the horses are fit for the remainder of the intended journey

ii) adverse hot prevailing or predicted weather conditions are not prevailing or predicted favourable

iii) additional spell times during the journey

iv) a longer spell time at the end of the journey

v) the recent management of the horses before first loading.

GB8.2 Conditions that could cause horse welfare to decline during transport and should be considered unfit for transport might include; any signs of colic, raised or lowered body temperature, lethargic or dehydrated horses, or horses with profuse diarrhoea, disease, fever, wounds, abscesses and lameness. A decision to transport a horse with the above conditions should be made after considering the welfare of the animal concerned and the treatment and management options.

GB8.4 Mares in the last month of pregnancy should not be transported unless under veterinary advice, which should include the following provisions:
• water deprivation time should not exceed 8.5 hours

GB8.6 Horses should be at least a body condition score of 2 before transport, as described in Table B8.1 below. Horses below condition score 2 should only be moved after veterinary advice and for the shortest distance necessary.

GB8.8 Adult horses should be fed and watered at floor level every 5 hours and as soon as possible after unloading, with a suitable quality and quantity of feed and water to minimise colic risk.

GB8.10 The number of bays provided on the vehicle should be selected according to the duration of travel; the ventilation capacity of the vehicle; the size, class and condition of the horses; and whether feed and water is to be provided as part of during the journey.

GB8.198 Flooring should be cleaned before transport. Floors should be drained, absorbent or covered with litter material to absorb urine when transporting for longer durations.

Note
Vehicles for transporting horses may vary from single horse floats to commercial prime movers with partitioned pens or stalls.

GB8.204 Where a single horse is being transported in a two-horse trailer, the horse should be placed on the driver’s side of the trailer or float and if possible given the opportunity to stand sideways by removing the central partition.

Deletion of the definition of ‘yearling horse’ as it is not required.

**yearling horse** Horse older than first registered birth date.

**Pigs**

**Background**
Community interest in pigs is high following the recent review of the pig code. APL has provided a high level of technical input into these standards and guidelines from a diverse committee of pig industry representatives. The issues presented have been discussed at length.

**Submissions**

**Journey time**
APL request an extension to SB 9.2.

SB9.2 Journey time may be extended to 48 72 hours only under the following conditions:

i) pigs must have access to water and food on the vehicle
ii) there must be space for all pigs to lie down  

iii) pigs must be assessed regularly to be fit for the remainder of the intended journey  

iv) pigs must be provided with water, food and rest for 24 hours before starting another journey.

**Fitness**

AA recommends changes to GB9.1 iv):

GB9.1 Health conditions that could cause pig welfare to decline during transport and should be considered unfit for transport include any of the following:

i) lameness conditions where a pig can place weight on all legs  

ii) tail bite wound  

iii) fresh rectal, vaginal or perineal prolapse  

iv) umbilical, scrotal or traumatic hernias which touch the ground or are ulcerated or injured or of a size or in a location likely to cause increased pain or distress during transport.

The guideline covers all forms of prolapse in pigs and the proposal does not add any further detail to the guideline. SA4.1 iv) is considered adequate to protect against increased pain or distress during transport.

A Angels do not support the transport of sows with piglets less than 15 kgs.

**Hot & cold conditions**

DPI Vic proposes that GB9.8 is developed into a standard. CIWF also support this position. DPI&W Tas recommend “10% more space when the temperature is over 25 degrees” and “pigs should not be transported when the shade temperature s expected to exceed 38 degrees”. AL SA represents a 20% reduction over 30°C to minimise heat stress. AA believes that the loading density guideline for pigs (GB9.6) is insufficient and that there must be a standard to allow sufficient space for all pigs to lie down during transport. AA also believes that there should be a new standard to require a 20% reduction in loading density when the temperature exceeds 30°C and to prevent loading during the hottest part of the day or when the temperature exceeds 30°C.

GB9.8 In hot weather, strategies should be considered to minimise heat stress and avoid windburn and sunburn. As a guide, 5% fewer pigs should be loaded in very hot weather.

**Note**

Other strategies should include, but are not restricted to, deferring loading or travel during cooler times of the day or at night; using tarpaulins and shade cloth, hoses, sprays, misters; wetting bedding in accordance with biosecurity regulations, providing water; and making sure vehicles transporting pigs are not stationary.

SB9.X In hot weather, strategies should must be considered to minimise heat stress and avoid windburn and sunburn. As a guide, 5% fewer pigs should
must be loaded in very hot weather.”

This proposal is covered by SA5.14 and it is debatable whether additional general emphasis is required for pigs. The proposal is not recommended.

VFF recommend that the note below GB9.8 is included in the guideline as indicated. VFF feel that the strategies are more effective than reduced loading density.

GB9.98 In hot weather, strategies should be considered to minimise heat stress and avoid windburn and sunburn. Strategies should include, but are not restricted to, deferring loading or travel during cooler times of the day or at night; using tarpaulins and shade cloth, hoses, sprays, misters; wetting bedding in accordance with biosecurity regulations, providing water; and making sure vehicles transporting pigs are not stationary. As a guide, 5% fewer pigs should be loaded in very hot weather.

Note

Other strategies should include, but are not restricted to, deferring loading or travel during cooler times of the day or at night; using tarpaulins and shade cloth, hoses, sprays, misters; wetting bedding in accordance with biosecurity regulations, providing water; and making sure vehicles transporting pigs are not stationary.

APL recommends a change to GB9.9:

GB9.109 In cold weather, loading strategies that minimise cold stress should be considered for classes of pigs that are likely to be more at risk (e.g. piglets). Pigs should not be fed before transport as they often get motion sickness and nausea resulting in vomiting.

Loading density

APL indicate that they are conducting research to make a recommendation for loading densities for pigs < 50 kg liveweight and are able to recommend verified data for the three lowest categories.

GB9.76 The following space allowances based on the standing position specified in the table below should be provided:
<table>
<thead>
<tr>
<th>Average liveweight (kg)</th>
<th>Space allowance (m²/head)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>0.04</td>
</tr>
<tr>
<td>15</td>
<td>0.09</td>
</tr>
<tr>
<td>25</td>
<td>0.12</td>
</tr>
<tr>
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<tr>
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<td>0.61</td>
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<tr>
<td>225</td>
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<tr>
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<tr>
<td>275</td>
<td>0.81</td>
</tr>
<tr>
<td>300</td>
<td>0.87</td>
</tr>
</tbody>
</table>

AL SA correctly point out that the space allowances in GB9.6 are inadequate for all pigs to lie down and they recommend revision and a new standard:

SB9.X “All pigs must be provided with a space allowance and bedding sufficient for all of them to be able to lie down at the same time.”

The issue of bedding has been discussed at length and it is has been agreed that it is generally not practical or possible to provide due to biosecurity requirements and not a welfare consideration for the majority of shorter journeys.

**Pregnant sows**

AA, AL Qld, AL SA, A Angels support GB9.2 to become a standard. It must be noted that transport of sows over 100 days pregnancy (last two weeks) is covered by SA4.1 vi). There are no other standards for the transport of pregnant sows as it is rarely an issue. The proposal is:

SB9.X ‘Transporting sows about to farrow or more than 80 days pregnant should be avoided must not be done. Transport of sows should must be over short distances. Additional care should must be provided, and may includes space to lie down on the vehicle, and appropriate feed and water’.

AL Qld, AL SA also recommends the conversion of GB9.3 into a standard but do not support the transport of lactating sows with piglets.

SB9.X “Transport of Lactating sows with piglets should be avoided must not be transported unless it is over a short distance to improve the welfare of the pigs. If transported, the lactating sows should must be segregated from all other pigs and the piglets protected appropriately. Additional care should must be provided, and may including space to lie down on the vehicle, and appropriate feed and water bedding.”

Both the above proposals concern infrequent situations and the existing standards are considered adequate. No changes recommended.
Handling
Proposed by DPI Vic. They are concerned about OH&S implications of use of ‘body position’. VFF have similar concerns with the wording.

GB9.14 When handling or moving pigs, stockpersons should use their body position moving boards, flappers and canes.

Humane destruction
APL an addition to GB9.15:

GB9.15 For adult pigs, a rifle should deliver at least the power of a standard 0.22 magnum cartridge. For older boars and sows, a 0.30-calibre firearm should be used. For piglets, a rifle should deliver at least the power of a standard 0.22-long rifle cartridge and should be aimed in the frontal or temporal positions. Figure B9.1 shows the optimum position for humane destruction of pigs. Blunt Trauma is the preferred method for piglets less than 15 kg.

AHA recommends deletion of note under standards as it is not relevant and may be confusing:

Note
Unloading for spells should be avoided for welfare and biosecurity reasons. However, spells longer than 4 hours can be deducted from the total water deprivation time. A spell less than 4 hours is not recommended or recognised for water deprivation time calculation, but can be taken as necessary.

Action
No changes to standards are recommended except SB9.2, SB9.5. Time off water, contingency extensions, spelling, electric prodder use, dogs and loading density issues have been considered separately in this report. The following amendments were agreed by the majority of the Reference Group.

SB9.2 Journey time may be extended to 72 hours only under the following conditions:

i) pigs must have access to water and food on the vehicle within every 24 hours

ii) there must be space for all pigs to lie down

iii) pigs must be assessed regularly to be fit for the remainder of the intended journey

iv) pigs must be provided with water, food and rest for 24 hours before starting another journey.

SB 9.5 to be deleted and incorporated into a guideline consistent with all other species.

SGB9.5162 Approved Recommended methods for humane destruction are include:
i) for pigs are firearm aimed in the frontal or temporal position, captive bolt aimed in the frontal position

ii) for piglets less than 15 kilograms are blunt trauma, firearm, or captive bolt or lethal injection.

Delete note:

Note

Unloading for spells should be avoided for welfare and biosecurity reasons. However, spells longer than 4 hours can be deducted from the total water deprivation time. A spell less than 4 hours is not recommended or recognised for water deprivation time calculation, but can be taken as necessary.

The following guideline proposals are recommended:

An additional fitness guideline (new GB9.1) is proposed in relation to time off water in that section. The following will become GB9.2 etc.

GB9.1 Health conditions that could cause pig welfare to decline during transport and should be considered unfit for transport include any of the following:

i) lameness conditions where a pig can place weight on all legs is able to walk on its own by bearing weight on all legs

ii) tail bite wound

iii) fresh rectal, vaginal or perineal prolapse

iv) umbilical, scrotal or traumatic hernias which touch the ground or are ulcerated or injured or of a size greater than 30 cm in diameter should not be loaded and should be destroyed on-farm, or in a location likely to cause increased pain or distress during transport.

GB9.76 The following space allowances based on the standing position specified in the table below should be provided:
<table>
<thead>
<tr>
<th>Average liveweight (kg)</th>
<th>Space allowance (m²/head)</th>
<th>Number of head per 12.5 m x 2.4m deck</th>
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</thead>
<tbody>
<tr>
<td>5</td>
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</tr>
<tr>
<td>300</td>
<td>0.87</td>
<td>34</td>
</tr>
</tbody>
</table>

**GB9.98** In hot weather, strategies should be considered to minimise heat stress and avoid windburn and sunburn. Strategies should include, but are not restricted to, deferring loading or travel during cooler times of the day or at night; using tarpaulins and shade cloth, hoses, sprays, misters; wetting bedding in accordance with biosecurity regulations, providing water; and making sure vehicles transporting pigs are not stationary. As a guide, 5% fewer pigs should be loaded in very hot weather.

Deleted note below incorporated into GB9.8 above.

Other strategies should include, but are not restricted to, deferring loading or travel during cooler times of the day or at night; using tarpaulins and shade cloth, hoses, sprays, misters; wetting bedding in accordance with biosecurity regulations, providing water; and making sure vehicles transporting pigs are not stationary.

**GB9.109** In cold weather, loading strategies that minimise cold stress should be considered for classes of pigs that are likely to be more at risk (e.g. piglets). These strategies should include, but are not restricted to, using vehicles with enclosed fronts; covering sides of the vehicle with tarpaulins or other cover; and providing bedding according to biosecurity regulations. Pigs should not be fed before transport as they often get motion sickness and nausea resulting in vomiting.

Deleted note below incorporated into GB9.9 above.

These strategies should include, but are not restricted to, using vehicles with enclosed fronts; covering sides of the vehicle with tarpaulins or other cover; and providing bedding according to biosecurity regulations.

**GB9.154** When handling or moving pigs, stockpersons should use their body position moving boards, flappers and canes.
GB9.15 now incorporates the relevant parts of the deleted SB9.5.

GB9.175For adult pigs, a rifle should deliver at least the power muzzle energy of a standard 0.22 magnum cartridge and should be aimed in the frontal or temporal positions. For older boars and sows, a 0.30-calibre firearm should be used. For piglets, a rifle should deliver at least the power muzzle energy of a standard 0.22-long rifle cartridge and should be aimed in the frontal or temporal positions. Figure B9.1 shows the optimum position for humane destruction of pigs. Blunt Trauma is the preferred method for piglets less than 15 kg.

Note from below GB9.17, under the Figure B9.1 recommended positions for humane destruction of pigs

Note: (A) indicates the frontal method for firearm and captive bolt and (C) indicates the temporal method suitable for firearm only. The dots indicate the point of aim and the arrows indicates the direction of aim for the positions. The aim point for the frontal position is low on the forehead. The positioning lines go from the outside base of the ears to the eyes.

Poultry

Background
There is a high level of community interest in poultry and a high degree of industry representation. The poultry transport code has been reviewed in the recent past years. There is still a considerable amount of discussion on these species. As a small species the level of physical contact and risk to welfare is higher; many poultry species must be individually caught, handled/lifted and then caged, for transport.

Submissions

Handling
DAFWA believe that the standard SB 10.4 for poultry in containers is not verifiable and recommends that it be a guideline. AL Qld, A Angels recommend that ‘excessive’ is deleted from or defined (clause ii) of SB10.4. A Angels recommend that the SB10.3 container limit is 6 hours. No change recommended.

The following change to include layer hens in the exemptions is proposed by QEFA on the basis that chicken breeder birds and layer hens are not different. This view is not shared by other industry organisations as spent layer hens are often severely calcium depleted. AL Qld, A Angels do not support the exemptions.

SB 10.6 Poultry excluding chicken breeder birds, geese, turkeys and ducks, must not be lifted or carried by the head, neck, wings, feathers or tail feathers unless otherwise supported by the breast.

Exceptions are permitted for:
i) chicken breeder birds, layer hens and adult geese may be lifted and carried by the base of both wings

ii) turkeys may be lifted by the tail feathers and neck or by a leg and a wing

iii) ducks may be lifted and carried by their necks or by the base of both wings.”

RSPCA Australia, AACT, PACAT, AL Qld wish to see no exclusions for lifting of poultry as in SA5.6. RSPCA Vic is totally opposed to lifting of any category by a single leg. DPI Vic is opposed to lifting of any category by a single leg unless animals are given additional support or alternatively they recommend that animals are younger than 3 months. This issue is primarily discussed in the SA5.6 handling standards section. Additional guidelines may be of value.

To replace GB10.23 and GB10.24

‘Care should be taken when carrying meat chickens to reduce the risk of injury and to keep birds calm. For meat chickens weighing less than 1.7 kg loaded by hand, the maximum carried should be 11 birds, with 5–6 chickens in each hand.’

‘For meat chickens weighing more than 1.7–2 kg, the maximum number of birds carried should be 4–5 birds at a time in each hand, depending on their liveweight.’

SB10.x ‘The number of meat chickens weighing less than 2kg that can be carried in each hand must not exceed 3-4 birds, and for chickens weighing over 2kg, not more than 2-3 birds in each hand. All birds must be carried by both legs (not a single leg/bird)’.

DPI Vic, AA, CIWF, AL SA recommends that GB10.26 be developed into a standard. ACMF, QEFA do not support this proposal. VFF recommend deletion of the last sentence in GB10.26:

GB10.26. ‘When removed from cages, end-of-lay hens should be held either firmly around the body or by both legs, not by a single leg, which could cause injuries. A breast support slide should be used for end-of-lay hens.’

SB10.x “When removed from cages, During removal from cages and carrying to transport containers, end-of-lay hens should must be held either firmly around the body or by both legs, not by a single leg, which could cause injuries. A breast support slide should must be used for end-of-lay hens.”

Issue discussed comprehensively in the past, guidelines considered adequate. Discussion on SA5.6 is also relevant.

**Hot and cold conditions**

AA recommends that GB10.15 and GB10.16 be amended and become a standard. AL SA recommends that GB10.9, GB10.13 to GB16 be developed into standards to protect birds
from hot and cold conditions. A Angels recommend that the temperature range is defined as 10 to 25 degrees.

**GB10.15** If temperature exceeds 30°C when transporting poultry (excluding chicks), or while waiting to unload at the processing plant, vehicles should not be left stationary, without shade, fans, misters, or other cooling being provided.

**GB10.16** ‘Where facilities are not available for protection from the weather, birds in transit or waiting unloading for slaughter should not be required to remain in a parked vehicle for more than 2 hours’.

**SB10.x** If the ambient temperature exceeds 30° C, vehicles transporting poultry must not be left stationary unless provision is made for the load to be placed in a shaded and artificially ventilated area. Birds must not remain in crates for more than 2 hours after arrival’.

Issue discussed comprehensively in the past, guideline considered adequate.

### Inspections

DPI Vic, AA recommends that poultry are not excluded from driver inspection requirements of SA5.11, discussed in the section on this standard.

**SA5.11** The driver must inspect livestock (except poultry):

i) on the vehicle before departure

ii) within the first hour of the journey and then at least every three hours or at each rest stop, whichever comes first

iii) at unloading.

### Humane destruction

DPI Vic recommends that SB10.5 be expanded to include ‘immediate’ humane destruction. This issue is considered to be covered by SA4.1 i) and SA4.4 as these animals would have a non-weight bearing lameness and could not be considered fit to travel. In most cases the appropriate action under SA4.4 would be humane destruction at the first opportunity following detection of the case. The new standard is not recommended as it is covered by existing standards as described.

PACAT point out that SB10.9 implies 100% CO2 which is aversive, and recommend that it specify “maximum of 80% CO2”. There is no basis given for this recommendation but is proven that concentrations of CO2 >30% are aversive to some poultry species, higher concentrations also induce anaesthesia more rapidly and may be necessary to complete the humane destruction for ducks and geese. A guideline is suggested:

**GB10.X** “Use of CO2 should follow established standard operating procedures for the technique and species, including a minimum of 70% CO2 and exposure for one minute or longer to cause death.”
Turkey industry representatives recommend changes to SB10.9 to recognise the practical limitations of cervical dislocation and take into account their species which can weigh up to 38 kg.

**SB10.9** The approved methods for humane destruction of poultry are cervical dislocation of birds less than 5 kg, decapitation, captive bolt or use of CO₂ gas.

GB10.X Cervical dislocation should only be performed when competent operators can guarantee success at the first attempt.

### Loading density

PACAT, AL SA recommends that GB10.10 be developed into a standard.

**GB10.10** All birds should be able to sit on the floor at the same time.
**SB10.X** All birds must be able to sit on the cage floor at the same time.

Issue discussed comprehensively in the past, guideline considered adequate.

### Chicks

DPI TAS proposes the following standard and guidelines for chicks:

**SB10.X** “Chicks must be protected from chilling and overheating and placed in a suitable brooding environment with feed, water and temperature control immediately after arrival and within 72 hours of hatching.”

**GB10.X** “Delays in transport should be minimised for chicks, with departure at the first opportunity after hatching and placement within the brooding environment immediately after delivery and within 60 hours of hatching.”

**GB10.X** "Chicks which cannot be brooded within 72 hours of hatching should be humanely destroyed."

### Feed

AA recommends new standards, deletion of guidelines and changes to standards for feed access and handling for poultry. CIWF, AL SA is supportive of this position on handling. The change is not recommended on the basis of past Reference Group discussions that have focussed on practical considerations.

To replace GB10.5 and modify SB10.2:

**GB10.5 - Poultry**, excluding chicks, should have access to food within the 12 hours before assembly for transport, and within 12 hours of removal from their transport containers.

**SB10.2** Poultry, excluding chicks, must have access to food within the 12 hours immediately before assembly for transport.

Issue discussed comprehensively in the past, standard and guideline considered adequate.
Action

Most of the proposals have been discussed in depth in the past by the Reference Group and it is difficult to recommend further changes. The following proposals are recommended and the following amendments were agreed by the majority of the Reference Group:

SB 10.6 “Poultry excluding chicken breeder birds, geese, turkeys and ducks, must not be lifted or carried by the head, neck, wings, feathers or tail feathers unless otherwise supported by the breast.

Exceptions are permitted for:

i) chicken breeder birds and adult geese may be lifted and carried by the base of both wings

ii) turkeys may be lifted by the tail feathers and neck or by a leg and a wing

iii) ducks may be lifted and carried by their necks or by the base of both wings.”

SB10.8 “The transporter must take reasonable action to minimise the risk to the welfare of chicks must be protected from chilling and overheating and chicks must be placed in a suitable brooding environment after arrival and with feed, and temperature control immediately and within 72 hours of take-off hatching.”

GB10.17 Delays in transport should be minimised for chicks with departure at the first opportunity after hatching and placement within the brooding environment immediately after delivery and within 60 hours of hatching.

GB10.18 "Chicks which cannot be brooded within 72 hours of hatchin take-off should be humanely destroyed.”

GB10.34 Recommended The approved methods for humane destruction of poultry include are cervical dislocation of birds less than 6.5 kg or decapitation, captive bolt or use of CO2 gas.

The majority of the Reference Group endorsed this approach for all species with the relevant standards to be made into guidelines.

GB10.35 Cervical dislocation should only be performed when competent operators can guarantee success at the first attempt.

GB10.X “Use of CO2 should follow established standard operating procedures for the technique and species, including a minimum of 70% CO2 and exposure for one minute or longer.”

An additional fitness guideline is proposed in relation to time off water in that section.

The following clarifications are recommended:

SB10.1 Time off water must not exceed the time periods given below:
### Class Maximum time off water (hours)

<table>
<thead>
<tr>
<th>Class</th>
<th>Maximum time off water (hours)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Poultry</td>
<td>24</td>
</tr>
<tr>
<td>Chicks</td>
<td>60(^a) following take off(^b)</td>
</tr>
</tbody>
</table>

\(^a\) Normal allowable time off water is 72 hours, allowing 12 hours for hatching time before removal (take off) from the hatchery.

\(^b\) Water deprivation time allowed can be up to 72 hours following take-off hatching if provided with hydrating material in the transport container.

GB10.4 Numbers of birds found dead on arrival should be recorded and the information communicated to the consignor and transporter.

**Note**

Selection of poultry occurs in the weeks before transport as part of the on-farm culling practices by the grower. Effective culling procedures should be in place to ensure that any birds found unsuitable or unthrifty for transport are managed on farm or humanely destroyed before the day of pick-up.

GB10.21 Container doors should be as large as practical, and openings for meat chickens are recommended to be 20 cm wide and 22 cm high or greater. The following transport container heights are recommended:

<table>
<thead>
<tr>
<th>Category</th>
<th>Minimum height (cm)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chicks, turkey poults, ducklings</td>
<td>12</td>
</tr>
<tr>
<td>Squabs</td>
<td>15</td>
</tr>
<tr>
<td>Meat chickens</td>
<td>23</td>
</tr>
<tr>
<td>Started pullets, ducks, end-of-lay hens, meat and layer breeder birds</td>
<td>25</td>
</tr>
<tr>
<td>Turkeys</td>
<td>32</td>
</tr>
</tbody>
</table>

### Sheep

**Background**

The interests of sheep have been well represented by a suite of stakeholders in the Reference Group. As a major species sheep have been at the forefront of many discussions on appropriate standards and guidelines. Sheep are generally regarded as a robust species and there have been few submissions. Time off water, contingency extensions, spelling, electric prodder and dog issues have been considered separately in this report.

**Submissions**

A Angels recommend a new standard that is loosely based on the concept of GB11.1 and incorporating elements of existing proposed standards and guidelines:

GB11.1 Additional considerations for sheep welfare should be made for long distance duration travel:
SB11.X Journey time may be extended to the maximum water deprivation times under the following conditions:

i) there must be space for all sheep to move, and rise unassisted

ii) sheep must be assessed every three hours to be fit for the remainder of the intended journey

iii) Adult sheep 6 months and over must be provided with water, food and rest for 12 hours before starting another journey.

iv) 5% fewer sheep must be loaded in weather temp exceeding 30 degree.

There are a number of issues that are primarily handled by other proposed standards – SA5.3, SA5.11, and SB11.2. The proposal is not recommended.

A Angels do not support the transport of lambs under 10 days old.

AL SA recommends a standard for protection against weather based on GB11.11 for lambs and newly shorn sheep in addition to SA5.14. This change is not recommended on the basis of previous Reference Group discussions.

GB11.11 Lambs and newly shorn sheep (up to 10 days off-shears) are susceptible to windchill and should be transported in vehicles with enclosed fronts or provided with protection during weather that could cause heat or cold stress or sunburn.

A revision of GB11.9 is proposed by SCA. MLA. DPI&W Tas suggest the following for inclusion; “reduce numbers by one sheep per 3 m pen for every 25 mm of wool”.

GB11.9 “The above stocking densities represent the minimum area that should be allowed for a group of sheep or lambs that have an average live weight as specified and in half wool. As wool length increases, the floor area allowed for each animal should increase or may decrease for newly shorn sheep. An increased area per animal should also be allowed where sheep are horned.”

A Angels propose a new standard as an extension of GB11.3:

GB11.3 Sheep should be fed dry hay or fibre before transport to sustain them for the journey. Consideration should be given to the impact of seasonal conditions and feed type when determining the appropriate water deprivation time(s) for sheep.

SB11.X All sheep, particularly wet and weak sheep, must be fed dry hay or fibre before transport, allowing for curfew periods as appropriate, to sustain them for the journey.

This submission goes against the grain of considerable Reference Group deliberations but further guideline recommendation could be made for lactating and weak sheep. No change is recommended to feed and water standards.
All other recommendations for sheep are discussed as generic issues.

**Actions**

Time off water, contingency extensions and spelling issues have been considered separately in this report. The following amendments were agreed by the majority of the Reference Group.

A change has been made to the humane destruction standard, this was subsequently made into a guideline.

<table>
<thead>
<tr>
<th>SGB11.143</th>
<th><strong>Recommended</strong> methods of humane destruction <strong>include:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>i) <em>For sheep over 6 months old</em> are firearm, captive bolt, or bleeding out; bleeding out by neck cut must be done only by a competent operator <strong>or under the direct supervision of a competent operator</strong> and in situations where there is no firearm or captive bolt available.</td>
<td></td>
</tr>
<tr>
<td>ii) <em>For lambs</em> are firearm, captive bolt, bleeding out or blunt trauma; bleeding out by neck cut must be done only by a competent operator or under the direct supervision of a competent operator and in situations where there is no firearm or captive bolt available; blunt trauma must only be used for kids that are less than 24 hours old and where there is no firearm or captive bolt available.</td>
<td></td>
</tr>
</tbody>
</table>

The following recommendations are made:

GB11.3 Sheep should be fed dry hay or fibre before transport to sustain them for the journey, particularly if they are lactating or weak. Consideration should be given to the impact of seasonal conditions and feed type when determining the appropriate water deprivation time(s) for sheep.

GB11.9 The above stocking densities represent the minimum area that should be allowed for a group of sheep or lambs that have an average live weight as specified **and in half wool**. As wool length increases, the floor area allowed for each animal should increase, or may decrease for newly shorn sheep. An increased area per animal should also be allowed where sheep are horned.

GB11.10 is duplicated – numbering issue to be rectified.

Additional detail

GB11.8 The following minimum space allowances should be provided:
<table>
<thead>
<tr>
<th>Mean liveweight (kg)</th>
<th>Minimum floor area (m²/ head)</th>
<th>Number of head per 12.5 m x 2.4 m deck</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>0.17</td>
<td>176</td>
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<tr>
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<td>103</td>
</tr>
</tbody>
</table>

a Based on average liveweight, wool of 25 mm length, and no horns
## APPENDIX 1 - GLOSSARY

### Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Definition</th>
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<tbody>
<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>NZ</td>
<td>New Zealand</td>
</tr>
<tr>
<td>PISC</td>
<td>Primary Industries Standing Committee</td>
</tr>
<tr>
<td>RIS</td>
<td>Regulation Impact Statement</td>
</tr>
<tr>
<td>Further</td>
<td>See appendix 2</td>
</tr>
</tbody>
</table>

Abbreviations and definitions used are as stated in the public consultation version of the Standards and Guidelines for the Land Transport of Livestock or the Regulation Impact Statement, unless specifically proposed for revision in this report.
**APPENDIX 2 - LIST OF SUBMISSIONS AND ACRONYMS**

**Standards Reference Group members**

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Organisation</th>
<th>Acronym</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>AA</td>
<td>Animals Australia</td>
<td>CCA</td>
<td>Cattle Council Australia</td>
</tr>
<tr>
<td>AHA</td>
<td>Animal Health Australia</td>
<td>DA/ADF</td>
<td>Dairy Australia / Australian Dairy Federation</td>
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<td>ACMF</td>
<td>Australian Chicken Meat Federation</td>
<td>LTA WA</td>
<td>Livestock Transporters Assoc, WA*</td>
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<td>ALEC</td>
<td>Australian Livestock Exporter’ Council</td>
<td>MLA</td>
<td>Meat &amp; Livestock Association</td>
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<tr>
<td>ALFA</td>
<td>Australian Lot Feeders Association</td>
<td>RSPCA</td>
<td>RSPCA Australia</td>
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<td>Australian Meat Industry Council</td>
<td>SCA</td>
<td>Sheepmeat Council Australia</td>
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<tr>
<td>APL</td>
<td>Australian Pork Ltd</td>
<td>WPA</td>
<td>Wool Producers Australia</td>
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<td>AVA</td>
<td>Australian Veterinary Association</td>
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*non-sitting members of SRG*

**Animal Welfare Working Group members**

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**Other organisations making submissions**

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**Individuals & individual businesses that made submissions**

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* Denotes submissions completed using the structured survey form
APPENDIX 3 - PICTORIAL REPRESENTATION OF STANDARDS AND GUIDELINES DEVELOPMENT PROCESS