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Animal Welfare Standards Public Consultation
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COMMENTS ON DRAFT CATTLE AND SHEEP ANIMAL WELFARE STANDARDS AND GUIDELINES

The LRTAWA was closely involved with the development of the Land Transport Animal Welfare Standards and Guidelines. The Association's principal interest was to ensure that animal welfare would genuinely be enhanced by placing accountability on individuals and groups along the supply chain that were in the best position to influence the outcomes. It is with this objective in mind that the attached comments are provided.

One of the stated objectives of revising and harmonising the standards and guidelines is to provide the basis for developing and implementing consistent legislation and enforcement across Australia. To this end we believe that as far as possible the whole suite of animal welfare standards and regulation should mirror one another in their terminology and prescriptions. This will reduce confusion along the supply chain, inconsistencies and possible legal challenges.

Importantly the onus on one section of the supply chain should not be seen to be greater than others. **Attachment 1** highlights areas of difference between the Land Transport standards and the Sheep and Cattle standards which in most cases could be overcome reasonably easily by language changes.

Thank you for the opportunity to comment. Please do not hesitate to contact us if further clarification is required.

Yours faithfully

Stephen Marley
President



COMPARISON OF LAND TRANSPORT ANIMAL WELFARE STANDARDS AND GUIDELINES TO SHEEP AND CATTLE ANIMAL WELFARE STANDARDS AND GUIDELINES

Responsibility and Planning		
Land Transport	Cattle	Sheep
<p>Objectives People responsible for the care and management of the livestock at all stages of the livestock transport process are identified, are aware of and are accountable for their responsibilities.</p> <p>Adequate planning is carried out and contingency measures are in place to minimise risks to livestock welfare.</p>	<p>Objectives A person knows their responsibilities for caring for cattle welfare and is able to perform the required tasks to minimise the risks to the welfare of the cattle</p>	<p>Objectives A person knows their responsibilities for caring for sheep welfare and is able to perform the required tasks to minimise the risks to the welfare of the sheep.</p>
<p>Standards 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.</p>	<p>Standards A person must take reasonable actions to ensure the welfare of cattle under their care</p>	<p>Standards A person must take reasonable actions to ensure the welfare of sheep under their care</p>
<p>Use of Prodders A person who handles livestock in the transport process must not use an electric prodder unless permitted in that species and must not use it: i) on genital, anal or facial areas; or ii) on livestock under three months old; or iii) on livestock that are unable to move away; or iv) Excessively on an animal.</p>	<p>A person must consider the welfare of cattle when using an electric prodder and must not use it:</p> <ol style="list-style-type: none"> 1) On genital, anal, udder or facial areas of cattle; or 2) On calves less than three months old, unless their welfare is at risk; 3) On cattle that are unable to move away; 4) In an unreasonable manner on cattle 	<p>A person must consider the welfare of sheep when using an electric prodder and must not use it:</p> <ol style="list-style-type: none"> 1) On genital, anal, udder or facial areas of sheep; or 2) On sheep less than three months old, unless their welfare is at risk; 3) On sheep that are unable to move away; 4) In an unreasonable manner on sheep

<p>Dogs A person in charge must ensure that a dog is under control at all times during loading, transporting and unloading livestock.</p> <p>A person in charge must ensure that a dog that habitually bites deer, goats, horses, pigs, poultry, sheep or emus and ostriches is muzzled if working these species.</p>	<p>A person in charge must have a dog under effective control at all times during the handling of cattle.</p> <p>A person in charge must ensure a dog is muzzled when moving calves less than 30 days old that are without cows.</p>	<p>[No equivalent standard relating to control of dogs]</p> <p>A person in charge of a dog that habitually bites sheep must muzzle the dog while working with sheep.</p>
<p>Humane Destruction A person in charge must ensure that humane destruction methods result in rapid loss of consciousness followed by death while unconscious.</p> <p>A person in charge must ensure a moribund animal is humanely destroyed by a competent person or under the direct supervision of a competent person at the first reasonable opportunity.</p> <p>If a competent person is not immediately available to humanely destroy an animal, the person in charge must arrange for a competent person to carry out the procedure at the first reasonable opportunity; unless it is in the welfare interest of the animal and a competent person is not immediately available, and the person considers they have the capability to destroy the animal.</p>	<p>Humane Killing A person in charge must ensure killing methods for cattle result in sudden loss of consciousness, followed by death when unconscious.</p> <p>A person in charge must have the relevant knowledge, experience and skills to be able to humanely kill cattle, or be under the direct supervision of a person who has the relevant knowledge and skills, unless</p> <p>a.The cattle are suffering and need to be killed to prevent undue suffering; and</p> <p>b. There is an unreasonable delay until direct supervision by a person who has the relevant knowledge, skills and experience is possible.</p>	<p>Humane Killing A person in charge must ensure killing methods for sheep result in sudden loss of consciousness, followed by death when unconscious.</p> <p>A person killing a sheep must have the relevant knowledge, experience and skills to be able to humanely kill sheep, or be under the direct supervision of a person who has the relevant knowledge and skills, unless</p> <p>a.The sheep are suffering and need to be killed to prevent undue suffering; and</p> <p>b. There is an unreasonable delay until direct supervision by a person who has the relevant knowledge, skills and experience is available.</p>

<p>A person humanely destroying an animal must take reasonable action to confirm the animal is dead.</p> <p>A person must only use blunt trauma to the forehead to destroy an animal if that animal is either a piglet up to 15 kg live weight or is less than 24 hours old and of the following species – alpacas, camels, cattle, deer, goats and sheep.</p> <p>Deer, goats or sheep must only be destroyed by bleeding-out by neck cut if the person is competent to perform the task or under the direct supervision of a competent person, and only in situations where there is no firearm or captive bolt available.</p>	<p>A person in charge of cattle suffering from severe distress, disease or injury that cannot be reasonably treated must ensure that the cattle are killed at the first reasonable opportunity</p> <p>A person killing cattle must take reasonable action to confirm the animal is dead</p> <p>A person killing a calf by a blow to the forehead must first ensure that the calf is less than 24 hours old.</p>	<p>A person in charge of sheep suffering from severe distress, disease or injury that cannot be reasonably treated must ensure that the sheep are killed at the first reasonable opportunity</p> <p>A person killing sheep must take reasonable action to confirm the animal is dead</p> <p>A person killing a lamb by a blow to the forehead must ensure that the lamb weighs less than 10 kilograms</p> <p>A person must only use bleeding out by neck cut to kill a conscious sheep when there is no firearm, captive bolt or lethal injection reasonably available.</p>
<p>Facilities (Guidelines)</p> <p>Railings on ramps and raceways should be of appropriate height, with the gaps sufficiently narrow at the bottom to prevent livestock being caught, slipping through or becoming injured.</p> <p>Ramps need to be wide enough to ensure easy movement and should be of an appropriate slope for the species and class of livestock.</p>	<p>Facilities guidelines do not include a requirement to take loading and unloading of livestock into account. Whilst acknowledging that guidelines do not have the compulsion of standards, such a reference would nonetheless assist transport operators to conform to the Land Transport guidelines.</p>	
<p>Glossary</p>		
<p>Animal Welfare</p> <p>The wellbeing of the livestock under discussion, collectively, or as a single species or animal</p>	<p>The state of an animal and how well it is coping with the conditions in which it lives.</p>	<p>The state of an animal and how well it is coping with the conditions in which it lives.</p>

Calf Cattle less than 6 months old	A bovine animal less than 6 months old	
Inspection of livestock The visual appraisal of the health of each animal at rest including the ability to walk when they are not on a vehicle or in a container	Inspect The visual check of the health and welfare of cattle on an individual or herd basis	Inspect The visual check of the health and welfare of sheep on an individual or herd basis
Person in Charge In relation to an animal, means: (i) the owner of the animal; or (ii) a person who has actual physical custody or control of the animal; or (iii) if the person referred to in paragraph (ii) is a member of staff or another person, that other person; or (iv) the owner or occupier of the place or vehicle where the animal is or was at the relevant time. Note: At any one time there may be more than one person in charge. Responsibility for duty of care for livestock welfare may extend to the person's employer.	No definition	No definition
Humane Destruction The killing of an animal in a manner which causes rapid loss of consciousness and then death of the animal while unconscious.	No definition	No definition