



**Response to Australian Standards and
Guidelines for Welfare of Animals –
Land Transport of Livestock
Version 29 February 2008**

May 2008

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Background

The Australian Lot Feeders' Association (ALFA) welcomes the opportunity to provide comments to the Australian Standards and Guidelines for Welfare of Animals – Land Transport of Livestock (Version 29 February 2008).

ALFA is the peak representative body for the lot feeding industry. The industry is the fifth largest agricultural industry in Australia behind the grain, horticulture, grass fed cattle and dairy sectors. It has a value of production of approximately \$2.7 billion while employing some 2000 people directly and almost 7000 more indirectly. Approximately 40% of Australia's total beef supply, 80% of beef sold in major domestic supermarkets and the majority of production growth in the beef industry over the last 10 years has been due to the expanding feedlot sector.

The Australian feedlot industry is responsible for annually transporting more than 1.7m head of cattle into feedlots from varying distances. A somewhat lower number will also need to be transported to abattoirs after lotfeeding. The industry understands the duty of care and responsibility it has in ensuring the safe transport of over 3 M head of cattle per year.

National Animal Welfare Standards

ALFA understands and fully supports the development of national animal welfare standards across the road and rail livestock transport systems. It has demonstrated this commitment by participating in the development of the standards since drafting of the initial document commenced.

Throughout the process, ALFA has sought to present to the feedlot industry a document that is simple to understand and practical to implement. To fit in with the lotfeeding industry's quality assurance program, the National Feedlot Accreditation Scheme, it will also be important to be able to demonstrate that lotfeeders are working within the State legislative boundaries of the new animal welfare transport standards.

At the recent Livestock Transport Standards meeting in Canberra, 30-31 January 2008, the issue of water deprivation times (or time off water) for cattle and sheep was highlighted as an important animal welfare issue by several groups.

There are several components of this issue that require clarification before simple and practical standards are approved. As the maximum length of a journey is to be measured by the time that cattle do not have access to water, it is important to be able to identify when cattle had access to water before and during the journey.

As an example, when cattle are mustered and yarded before loading, it would be necessary for those working the cattle to identify whether the cattle were able to access water before or during mustering or whilst they were in the yards. The planning of the rest of the journey will depend on the accuracy of when the cattle last had access to water, especially when the journey will last over 36 hours.

There would then need to be a simple procedure for transferring the time off water information to the truck / rail driver as the cattle are transported to a sale yards, feedlot, different property, abattoir, live export yard, etc. If the cattle are split into different groups, the water deprivation time would need to follow the cattle wherever they were taken.



ALFA appreciates the moves that are being taken by the saleyards industry and others to develop quality assurance schemes that will ensure water is made available to cattle and sheep at all registered saleyards. This will greatly assist in reducing the animal welfare impacts on livestock as well as helping to plan the length of the next leg of the journey.

Once guidelines are in place for identifying and documenting the initial time off water, it will be necessary to be able to measure and audit total journey water deprivation times in line with legislative requirements. Systems will need to be developed to ensure that compliance to the standards is followed.

It is a fundamental shift to plan livestock journeys based on water deprivation times rather than the time that the livestock are actually on truck/rail. It is also considerably more difficult to measure the water deprivation time and ensure that good animal welfare is being maintained.

With any change in systems such as being presented in the new standards, there needs to be an awareness and training campaign that ensures all relevant sectors of the industry understand and implement the new requirements.

Regulatory Impact Statement

ALFA believes that there are a number of specific issues within the Regulatory Impact Statement that require further clarification.

ISSUE 1 - Standard SB 4.2 states that if cattle over 6 months old have been off-water for 48 hours, they must be spelled for 36 hours before starting or continuing another journey.

As Standard SB4.1 sets out that the maximum time off water for cattle over 6 months is 48 hours, it is therefore illegal for cattle to be off water for more than 48 hours. As it is highly unlikely that a journey will last exactly 48 hours, the requirement for a spell of 36 hours, under the current Standards, would seem redundant and a spell of 24 hours would be sufficient.

It is proposed that Standard SB4.2 be either;

- **deleted, or**
- **amended to identify a more suitable time off water after which the 36 hour spell is provided – eg after 40 hours off water.**

ISSUE 2 - *Regulatory Impact Statement (RIS), Section 3.0 Nature and Impacts of Proposed Standards. Case Example 2*

Case Example 2 describes water deprivation times for a 'typical' long cattle journey of 2,220km within Australia. The whole journey takes 7 days and includes mustering, yarding, curfews, transport, mid-transport break and arrival at a feedlot.

Within this example, it is assumed that if a spell onto water occurred mid journey, and the spell is greater than 4 hours;

- the spell time is not included in the total time off water, and



- the spell can also be deducted from the actual time off water.

In the example, the total time from first curfew to the last unloading is 84 hours. Included in this time is 19.4 hours where cattle had access to feed and water. This leaves a total time off water of 64.6 hours. It is then specified that the 19.4 hours can also be deducted from the 64.6 hours as the spell is greater than 4 hours. After this, the revised time off water is reduced to 45.2 hours and the journey is in full compliance with the proposed Standards.

This situation would seem to go against water deprivation times as set out in SB4.1. It is therefore proposed that Case Example 2 contains a mid-journey spell of at least 24 hours.

It is proposed that the following changes to Case Example 2 are made;

Day 5: Cattle remain on feed and water until midnight (24.4 hour spell).

Day 6: Overnight food and water curfew from midnight, load first light next day at 5 am (overall 29.4 hours break, including 24.4 hours on feed and water and a 5 hour curfew at end). All animals inspected for fitness before and during loading.

The closest reference describing the ability to deduct watering time from total time deprivation time seems to be in Appendix 1- Glossary of the Australian Standards and Guidelines draft document. This sets out under the meaning for 'Water Deprivation Time' that - *Where a voluntary spell exceeds four hours, the time that water is provided to livestock during the spell can be added to extend the total time of the trip if the livestock meet the fitness requirements.*

It is unclear whether this refers simply to not counting the spell time in the total time off water or both not counting the spell time and deducting the spell time from the journey to date.

ALFA would like to see this issue clarified, to the point where spell times greater than 4 hours are not included in the total time off water, but they cannot be used to increase the allowable time off water above 48 hours.

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