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Animal Welfare Standards Public Consultation
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To whom it may concern:

Submission to Animal Health Australia: Land Transport Standards Public Consultation

This is a submission to Animal Health Australia on the draft Animal Welfare Standards and Guidelines for the Land Transport of Livestock which is open for public consultation.

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Livestock Producer

3. Farm/Enterprise Background

- Poll Merino sheep producer
Victoria
- Producer for 30 years
- Livestock carted by contractor and by my own vehicle, transported to sale yards mainly.

4. Land Transport Standards and Guidelines

Concerns with the draft Land Transport Standard and Guidelines include:

Standards and Guidelines Reference:	Comment
SA 1.2 (page 7) <i>“For a journey reasonably expected to exceed 24 hours, there must be one or more documents that accompany the livestock...”</i>	An NVD is sufficient for this purpose. Unnecessary paper work will not achieve any benefit, producers don't need extra paper to prove their responsibility and care
B11- Specific Requirements for the Land Transport of Sheep	

<p>SB 11.1 (Page 83) <i>“Time off water must not exceed the time periods given below:</i></p> <table border="0"> <thead> <tr> <th style="text-align: left;">Class</th> <th style="text-align: right;">Maximum time off water (hours)</th> </tr> </thead> <tbody> <tr> <td><i>Sheep over 4 months old</i></td> <td style="text-align: right;">48</td> </tr> <tr> <td><i>Lambs under 4 months old</i></td> <td style="text-align: right;">28</td> </tr> <tr> <td><i>Ewes known to be more than 14 weeks pregnant excluding the last 2 weeks”</i></td> <td style="text-align: right;">24</td> </tr> </tbody> </table>	Class	Maximum time off water (hours)	<i>Sheep over 4 months old</i>	48	<i>Lambs under 4 months old</i>	28	<i>Ewes known to be more than 14 weeks pregnant excluding the last 2 weeks”</i>	24	<p>Strongly support the maximum water deprivation times in SB11.1. Note that these times include pre-transport curfews. The CSIRO research showed that adult sheep can travel for 48 hours without water. I strongly support science based rules,</p>
Class	Maximum time off water (hours)								
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<i>Lambs under 4 months old</i>	28								
<i>Ewes known to be more than 14 weeks pregnant excluding the last 2 weeks”</i>	24								
<p>GB 11.7 (Page 84) <i>“Under cold conditions in southern Australia, time off water should only be extended under the following conditions:</i></p> <ol style="list-style-type: none"> <i>i) weather conditions are considered to be a welfare risk due to wind chill hypothermia</i> <i>ii) sheep are assessed to be fit for the remainder of the intended journey</i> <i>iii) the additional time off water is spent on a stationary vehicle or in a facility</i> <i>iv) a document states the location, date, start and finish times of the delay.”</i> 	<p>Guideline should be a standard. If the livestock have been off water for a period that is approaching the maximum deprivation times, and cold conditions prevail, the transporter should stop the vehicle to reduce the wind chill and subsequent cold stress on the animals. The driver may be required to break the law (standard SB11.1) to ensure that the livestock’s welfare is not compromised. Therefore GB11.7 should be a standard</p>								
<p>GUIDELINE - GB11.8 (Page 85) Loading densities table</p>	<p>The loading density should stay in the guide lines. There are many factors to be considered when transporting sheep eg.length of wool their weight and body features such as horns.</p>								

<p>GA1.2 (page 8) <i>“The livestock consignor is responsible for the livestock until they are loaded onto the transport vehicle.”</i></p>	<p>The transporter should be responsible for the loading.</p>
<p>1- Stock Handling Competency</p>	
<p>GA2.2 (page 13) <i>“Supporting evidence of competency should include the following:</i></p> <ul style="list-style-type: none"> <i>• records of on-the-job training</i> <i>• relevant records of experience</i> <i>• recognised training and staff training registers</i> <i>• induction training</i> <i>• supervisor sign-off for specific tasks.”</i> 	<p>Relevant experience should be sufficient. Obviously any new comer should be supervised as part of their training.</p>
<p>SA5.7 (page 21) <i>“Electric prodders must not be used :</i></p> <ol style="list-style-type: none"> <i>i) on genital, anal or facial areas</i> <i>ii) on livestock under three months old</i> <i>iii) on livestock that are clearly unable to</i> 	<p>Electric prodders used sensibly and with care are an important aid for loading in certain cases.</p>

<p>move away iv) excessively on an animal.</p>	
<p>SA5.8 (page 22) <i>“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. Dogs that habitually bite; deer, goats, pigs, poultry, sheep and ratites, must be muzzled”</i></p>	<p>Muzzling of dogs should be at the operators discretion, ensuring both the dogs and the animals being loaded, welfare is always a priority.</p>

5. Regulatory Impact Statement

<p>Options (page ix and x) <i>‘Option B: the proposed standards’ - ‘expected costs are considered to be outweighed by the expected benefits’.</i></p>	<p>Support Option B, because the <i>‘expected costs are considered to be outweighed by the expected benefits’</i>. The livestock industry should not incur higher costs than option B</p>
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Caring for the well being of all animals is both of importance to me as a human and equally important in running my business which revolves around healthy and humanely cared for animals.

Yours sincerely

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