



Tasmanian Farmers & Graziers Association

ACN 009 477 810 ABN 69 646 967 202

A Member Of The
National Farmers' Federation

TFGA House
Cnr Cimitiere & Charles Streets
Launceston Tasmania 7250
PO Box 193
Telephone **03 6332 1800**
Facsimile **03 6331 4344**

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Animal Welfare Standards Public Consultation
PO Box 196
DICKSON ACT 2602

Email: consultation@animalwelfarestandards.net.au

Dear Sir/Madam,

Re: Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock

The Tasmanian Farmers and Graziers Association (TFGA) is the State's peak representative body for farmers. Membership totals some 3,600 members and extends across the wool, meat, dairy, vegetables and cereals and seed industries. Members are also involved in a range of other agricultural activities, including poppies, berries and pyrethrum, and private forest management and wood production in both native forest and plantations.

A report on the Contribution of Agriculture to the Tasmanian Economy highlighted agriculture is a more significant contributor to the Tasmanian economy than it is in any other state. Tasmania's 16% of gross state product from the farm dependent economy compares to a range of 10% to 15% for other states in Australia.

This can be partly attributed to the practices of good animal health and welfare practices of Tasmanian producers and the availability of moving livestock intrastate and interstate.

The TFGA is an affiliate of the Australian Dairy Farmers (ADF) and Sheepmeat Council of Australia (SCA) and supporter of Dairy Australia (DA). We understand ADF and DA are providing a joint response SCA are providing a response to the public consultation for the Draft Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock.

This letter embodies our support to the ADF and DA joint response and support to SCA response.

Comments from the ADF and DA response that we would like to emphasize further include the following:

B4 Minimum age for transport of calves for slaughter (other than to a calf rearing facility)

“...the dairy industry is concerned that the RIS does not adequately address the full costs to the industry should there be a requirement for farmers to retain calves until they are at least 8 days of age before sending them to slaughter compared to 5 days of age requirement as is current practice”.

- The TFGA believe the minimum age for transport of calves should be kept at 5 days because of the increase in susceptible to gastro-intestinal illness and infections.

SB4.1 Time off water

“The maximum time off water (calf feed) of 18 hours is not consistent with common and acceptable industry practice that calves are fed once daily (i.e. maximum interval between feeds of 24 hours).”

- The TFGA agree and recommend that the maximum time off water (calf feed) for calves 5-30 days old traveling without mothers be changed to 24 hours.

GB4.10 Loading Density

“...basing loading density on liveweight does not take into consideration the range of factors that contribute to animal comfort and well-being during transport and it is appropriate that it is no mandated as a Standard.”

- The TFGA recommend the table remain as a guideline only with changes to allow for livestock from 30 to 200kg liveweight. These changes to be adopted through affected parties such as members of the Standards Reference Group.

Comments from the SCA response that we would like to emphasize further include the following:

Section 5: Loading, Transporting and Unloading Livestock

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

- Remove the wording “livestock recover their normal biological state within a reasonable time after arrival” as this is very broad and too subjective.

GB11.7 Food and Water

“Under cold conditions in southern Australia, time off water should only be extended under the following conditions:

- i. weather conditions are considered to be a welfare risk due to wild chill hypothermia
 - ii. sheep are assessed to be fit for the remainder of the intended journey
 - iii. the additional time off water is spent on a stationary vehicle or in a facility
 - iv. a document states the location, date, start and finish times of the delay.”
- The TFGA agree that GB11.7 should be a standard as the aim of the animal welfare standards is to improve the animal welfare outcomes of livestock being transported.

GB11.8 Food and Water

General standards in Chapter 5 apply to sheep to ensure that the loading density is appropriate and is managed to minimise risks to the welfare of livestock.

- The TFGA agree that GB11.8 remain as a guideline only due to the number of variables associated with transporting sheep such as wool length, live weight, horns, climatic conditions etc.

We understand government's regulatory role and accept the shared government-industry responsibility to protect animal health and welfare. Similarly, we recognise the need for government to act expeditiously to address these issues, however not to the extent where the agricultural industry is burdened with more regulation that is necessary.

We appreciate the opportunity to convey our position in regard to the public consultation on the Draft Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock.

Yours sincerely,

Roger Swain
President