



Submission  
to the review of the

**Land Transport of Livestock Codes of Practice**  
(to be called Standards and Guidelines)  
May 2008

**Introduction:**

Animals Australia welcomes this opportunity to provide input to these Standards and Guidelines. We acknowledge the importance of moving from the current voluntary Codes to Standards which will be enforceable.

The review of these Codes will affect more than 969 million animals each year (estimate from the RIS) and thus it is crucial that the agreed Standards properly provide for the welfare of those animals, and that the States and Territories then ensure they are complied with.

We commend the following recommended higher Standards to the reference Group and in turn to the Primary Industries Ministerial Committee.

**General Comments:**

Scientists, government officers and stock-people all agree **live animal transport is a stressful experience for animals**; handling, mixing of unfamiliar animals, crowded conditions, enforced abstinence from normal food and water regimes, novel sights and sounds, and sheer fatigue all contribute. On extended journeys, over rough or winding roads, when weather conditions approach the extremes, if stockmen/drivers act inappropriately or aggressively towards the animals, or if there is equipment breakdown, then extreme distress, suffering and deaths do occur. It is therefore crucial that these Standards are sufficiently robust to prevent or reduce such outcomes.

Animals Australia welcomes the move to make some elements of animal transport arrangements mandatory as this should provide strong disincentives to those who may otherwise engage in high risk practices. We trust though that the State and Territories will ensure that enforcement authorities, organisation and officers will be willing and able to monitor (and enforce if necessary) livestock transport Standards. It is not clear from the Regulatory Impact Statement that this will be the case.

Animals Australia as a member of the 'Standards Reference Group' has raised most if not all the following issues during previous discussion – but again recommend the following significant changes to the current draft document.

## Specific Comments

### SA1.2

**Documentation:** Animals Australia welcomes the introduction of documentation of long distance journeys to ensure there is a record of time off water in particular, and inspection, emergency contacts etc. However, the current requirement for that to only be required on journeys expected to be at least 24 hours is inadequate.

It is of interest to note the new national road transport 'Heavy Vehicle Driver Fatigue laws' brought to our attention recently which allow drivers a maximum of 16 hours driving in any 24 hours period, and the requirement to keep a work diary of same. This by definition means that any journey exceeding 16 hours will require a further driver and written records then become essential to ensure accurate information is available to the new driver and to provide documentation to assist auditing of long journeys.

We note too that the EU transport regulations (1/2005) require a log of journeys that are 8 hours or more.

We therefore **recommend** that **SA1.2** be amended to require documentation be kept of any journey reasonably expected to exceed 16 hours.

In addition – there is a need to ensure that a contingency plan is in place.

**SA1.2 (iii)** must be extended to say 'a contingency plan including emergency contacts'. The detail for what is then required is provided in GA1.13 onwards.

### SA2.1

**Training:** Animals Australia is concerned that there is no requirement for **training** and/or accreditation of drivers to ensure their competency in animal handling, recognition of animal illness and suffering and livestock transport driving skills. We **recommend** that **SA2.1** be reworded (underlined) -

**SA2.1** Any person involved in handling, selection, loading, transporting and unloading livestock must have undergone accredited testing to demonstrate competency to perform their required task, or must be directly supervised by a competent person at all times.

The Pig Code – just recently completed includes a higher standard than the one proposed in this draft – i.e. Standard 2.2 in the Pig Code states:

2.2 Pigs must be cared for by personnel who are skilled in pig husbandry and are competent to maintain the health and welfare of the animals in accordance with the Standards listed in this Code, or are under the direct supervision of such personnel. **Such competency must be able to be demonstrated within 3 years of endorsement of this code.**

**Competency** in regard to dealing with injured animals, humane destruction: On long distance journeys it is likely that there will be many times when there is no assistance from local competent people to deal with severely injured animals. **G A2.1 vii** and **viii** highlight the crucial importance of identifying and competently dealing with such animals.

Animals Australia **recommends** that on long distance journeys – i.e. reasonably expected to exceed 16 hours, a Standard be made that requires a driver or stockhandler travelling with the vehicle to be competent in identifying animals that need to be euthanased, is licensed, and is competent to handle an appropriate weapon or captive bolt device and is equipped with the correct ammunition for the species being transported.

#### **SA4.1**

##### **Fit to Load**

There are high risks with transporting livestock under 'special circumstances' (see **GA4.3**), and by definition are marginally 'fit for a journey' and therefore Animals Australia **recommends** that **GA4.3** become a Standards and thus be worded:

**SA4.5:** Records must be maintained on any livestock that are transported under special circumstances

#### **SA5.3**

##### **Loading density**

Density (space allowance) is important and should be specified in the Standards (rather than in the Guidelines, as difficult as that may be). Some further comment is made on the species chapters below.

#### **SA5.6**

##### **Dragging**

The dragging of livestock **must be prohibited** by these Standards.

Injured or moribund animals must not be dragged, nor must they be moved from a vehicle (unloaded) unless that can be humanely achieved (without further suffering) and this can be done without delay in order to effect prompt destruction.

Recent media coverage of the dragging and inappropriate moving of downer cattle in the US has led to the closure of a major abattoir and revelations of similar problems across at least 4 States, leading to a tremendous loss of public confidence in animal standards in that country. A full account can be found at -

[http://www.hsus.org/farm/news/ournews/downer\\_investigation\\_050708.html](http://www.hsus.org/farm/news/ournews/downer_investigation_050708.html)

These Standards must ensure such practices are prevented and if detected could lead to sanctions.

Animals Australia **recommends** that **SA5.6** be amended to read:

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

...

iii) livestock must not be thrown, dropped or dragged.

...

(v) (new Standard, **amended** from **GA5.48**) livestock that cannot walk from the vehicle ('downers') should be destroyed humanely on the vehicle, or be humanely removed from the vehicle for immediate destruction.

#### **SA5.7**

**Electric prodders** cause unnecessary suffering and further stress to transported animals.

Alternative assistance in the movement of animals include good facilities, experienced handlers and aids such as those listed in GA5.9 (flappers, backing boards, rattlers, canes with flags etc.).

Animals Australia **recommends** that these Standards ban the use of electric prods on all animals, i.e.

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

**GA5.9** should thus be amended to remove the reference to electric prods, and **GA5.10** and **GA5.11** be removed – with relevant species specific guidelines similarly being amended to reflect amended SA5.7.

Note: it is of particular concern that **SB5.4** and **GB5.17** make it acceptable to use an electric proffer on an **adult deer** if 'reasonable actions to cause movement have failed'. These are very flighty, nervous animals that are prone to stress and the use of electric prodders is completely unacceptable. It is not surprising therefore that the NZ code of welfare for deer has among its minimum standards a prohibition of use of electric prods on deer. NZ has a very large deer industry and have clearly found that such use of an electric prod is unacceptable and unnecessary.

The Standards must include **a prohibition of any use of electric prods on deer.**

### **SA5.8**

**Dogs** cause further stress and worry to livestock during loading and unloading (though it is acknowledged they may be necessary during mustering of some species).

Attempting to define what 'habitually' bite means will be difficult. Any dog may bite, and this standard will only work if it is straight forward.

Animals Australia therefore **recommends** that a Standard be introduced that all dogs (if used) must be muzzled.

### **Time off water**

This issue is covered in each of the species chapters and so is addressed collectively here.

These Standards permit time off water up to 48 hours for some species (cattle, deer, goats and sheep, and even longer if a transporter can justify it), and thus total journey times that approach this time. As indicated in the submission from Animal Liberation SA, the scientific evidence in this area indicates that cattle for example become very tired and show signs of dehydration after just 24 hours of travel.

Further, in the 1992 EU scientific report on animal transport, it was reported that dehydration was evident in cattle after only 10 hours of transport, pigs actively sought water after 1.5 hour journey, and broilers showed signs of dehydration anorexia after 8 hours off water. In Australia, where temperatures can well exceed those in Europe, these indicators are important to consider.

## Section B comments – Species chapters.

Note: it is not possible for Animals Australia to comment on all sections.

### B4 – Cattle

#### SB4.1 Time off water

Animals Australia believes all of these times are too long – i.e. adult cattle should not be off water for more than 24 hours, and cattle with special needs such as lactating cows with calves, pregnant cows and bobby calves should go no longer than 12 hours without water or liquid feed (for bobby calves).

#### SB4.5

#### Bobby calves

There is naturally considerable concern about the transport and treatment of bobby calves. With over 800,000 bobby calves being sold for slaughter in Australia each year, this is a significant issue.

These young animals are at high risk during transport – the Regulatory Impact Statement states: *Bobby calves are physiologically immature with no fat reserves, poorly developed thermoregulatory mechanisms and a lack of responsiveness to external stimuli. These factors predispose them to difficulties in coping with transport and handling. (RIS page 11)*

The new Standards still permit young bobby calves to be subjected to an arduous day of travel and deprivation of liquid food prior to slaughter. Yet by way of comparison, new EU Welfare in Transport Regulations (No 1/2005) do not allow the transport of -

- **Very young animals**  
*except if the journey is less than 100 km, e.g. calves of less than 10 days of age, pigs of less than three weeks and lambs of less than one week*
- **Calves of less than 14 days of age**  
*on journeys exceeding 8 hours will not be permitted*

These are vulnerable animals that must have their needs catered for. There is little research in Australia, but that which exists indicates much more needs to be done to protect these animals, and **as a first step it is recommended** that these Standards provide the following for bobby calves are:

- transported when they are **older**, and thus more able to be handled (follow or be herded onto trucks) and to **withstand heat and cold** and endure a stressful period of transport without sustenance,
- given sufficient space for all to be able to **lie down**, and
- provided with **bedding** to assist with thermal regulation and comfort.

The survey work done by Cave et al and published in the AVJ<sup>1</sup> shows the average mortality of the calves surveyed during transport from meeting points (calf scales etc) in Northern Victoria to abattoirs in 1998, 1999 and 2000 was some 0.64% in the study.

If the average figure of bobby calves transported for slaughter in recent year - derived by the RIS authors (RIS p.127), is taken i.e. 832,562, then each year an estimated 5,328 calves may die during transport. More will have suffered but survived, and some will still die after unloading, but before routine slaughter. Cave et al believe it is feasible to at least halve this 'annual cost' to the industry, and particularly by reducing the distance the calves travel to slaughter.

The following altered standards are therefore **recommended** for bobby calves:

#### **SB4.4**

This Standard must be amended to apply to calves less than **ten** days of age – i.e. calves from birth to 9 days old may only be transported to a calf-rearing property with the higher standards set out in this existing Standard.

#### **SB4.5**

This standard must be amended to

- apply to calves between **10** and 30 days of age travelling without their mothers,
- ii) to be transported to ensure no more than **12** hours since the last feed,
- to ensure all calves have **space to lie down** on the transport,
- to ensure all calves have thick comfortable bedding material on the vehicle, and
- to ensure they travel to the **closest available abattoir** with facilities to slaughter calves.

There are other concerns of course with the bobby calf slaughter trade – in particular their fitness (scours and thus dehydration) and immature calves due to calving induction (some Friesian/Holstein breeds may be large and thus even when premature (GB4.5 relates), may pass the weight limit).

New Standards should be introduced to ensure these calves are judged unfit for the journey.

#### **SB4.8 ii)**

Young calves that are to be killed using blunt trauma (for calves in their first day of life) should also be bled out. The concern here is that an inexperienced person may not deliver a blow sufficient to kill the calf – merely stun it – and thus the calf needs to be bled out to ensure there is no recovery.

### **SB9 – Pigs**

Pigs need special consideration given they are more susceptible to heat or cold stress than most other livestock, and also may suffer from motion sickness. Some adult pigs may also be ex-breeding stock that may be particularly large and/or lame and thus more difficult to handle.

**SB9.1 and SB9.2** contemplate journey times being extended to 48 hours if water is available. Pigs are notoriously distressed if their normal feed is not delivered, and to be kept without food for that period of time is unacceptable. Similarly to be kept without water for up to 24 hours during our summer is unacceptable for pigs. The EU Regulations (1/2005) allow only a maximum of 24 hours transport for pigs with water supplied.

Animals Australia therefore **recommends** for pigs a variation to these Standards **SB9.1** and **SB9.2** to include:

- A maximum time off water of 16 hours (less for weaners)
- An extension of transport to 24 hours if water is available on the vehicle.

#### **GB9.1 iv)**

This quantification of fitness to load provides a standard that is **unacceptable**. Large hernias may not be in a position where they will ‘touch the ground’ but may still be outside the general fitness to load standard acceptable from a welfare perspective (**SA4.1**).

**GB9.1 iv)** must be altered to read:

iv) Umbilical, scrotal or traumatic hernias which are ulcerated or injured or of a size or in a location likely to cause increased pain or distress during transport.

#### **GB9.2**

The transportation of sows is of particular concern – for the sow and any offspring she may have during transit. **This Guideline should become a Standard**, and instead of saying this practice 'should be avoided', it must be clear that this is prohibited unless for a welfare purpose, over a short distance (e.g. from one property or facility to another as discussed for dairy cows) and with adequate comfortable bedding.

#### **GB9.6** re space allowance.

As indicated above – we believe and have **recommended** that all minimum space allowances mentioned in the Guidelines should become standards.

However, in regard to pigs, scientific work indicates that pigs will lie down if given sufficient space, and that this reduces fatigue and mortality rates. Further, the EU Directive (1/2005) requires a minimum of 0.42sqm for 100kg pig – and thus the space allowance at GB9.6 is inadequate (i.e. at only 0.35 sqm per 100kg).

The **space allowance for pigs during transport must be increased** to a sufficient space to allow all pigs to lie down, and those minimums should be included as a Standard.

#### **GB9.8**

These Standards do not provide sufficiently for the problems pigs encounter if transported in extremes of weather, particularly heat or humidity. Pigs are particularly susceptible to heat stress, yet this issue is only dealt with in the Guidelines, and then only suggesting 5% fewer pigs be loaded. The EU Directive suggest 20% reduction stocking density to assist with heat dissipation for transported pigs.

Rather than mere guidelines, Animals Australia **recommends** that **a new Standard should be introduced** to prohibit the transport of pigs during the hottest part of the day, or when the temperature exceeds 30 degrees, and that in summer a 20% reduction in stocking density must be observed.

### **B10 - Poultry**

The transport of poultry involves literally hundreds of millions of animals each year and thus deserves considerable attention. An added concern is that as each animal is of lesser financial value than larger animals (sheep, horse, pigs, cattle) their individual care may be neglected.

Injuries occur frequently during catching and transport of both broiler and spent battery hens. Each year in Australia almost 1 million meat chickens are estimated to die during transport to the slaughterhouse. Of those that survive, some 14 million may have fractures (3%) and over 20 million chickens (4.5%) may have dislocated hips when they arrive for slaughter (based on UK studies using similar birds and transport systems).

For spent battery hens we know that due to osteoporosis the level of breakages are even higher – 24% of hens have breaks prior to slaughter<sup>ii</sup>. A Victorian study by Dr Greg Parkinson (DPI) of end-of-lay hens has shown that 14-17.5 per cent have broken bones in the cages, and some flocks have up to half with broken bones at the time of slaughter.

These figures relating to broken bones and dislocation clearly show that more care is needed in the depopulation phase and the handling and transport of these small and fragile animals.

It is therefore totally unacceptable for 'spent' layer hens to be permitted to be carried upside down to the transport carriers with up to 5 held in each hand of the catchers – see **GB 10.25**. **GB 10.24** similarly allows meat chickens to be carried in this way (up to 11 per person at any one time) and they are at risk of hip displacement due to their heavy bodies.

Animals Australia **recommends** that new Standards are made to address this high welfare risk and reduce the pain and suffering caused to commercial poultry.

To replace **GB10.5**

**Standard:** Birds must have access to food up until immediately prior to loading.

To replace **GB10.23 and GB10.24**

**Standard:** The number of **meat chickens** weighing less than 2kg that can be carried in each hand must not exceed 3 birds, and for chickens weighing over 2kg, not more than 2 birds in each hand. All birds must be carried by both legs (not a single leg/bird).

Guideline **GB10.26** must be incorporated as a Standard:

**Standard:** During removal from cages **and carrying to transport containers**, end-of-lay hens must be held either firmly around the body or by both legs. A breast support slide must be used for end-of lay hens.

**Ventilation** is extremely important to transported birds, particularly during hot weather. Usually ventilation throughout the load (stacked crates) will be dependent upon vehicle movement. Therefore to ensure this crucial element is always addressed guidelines **GB10.15 and GB10.16** must be amended and become a standard:

**Standard:** 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.

**SA5.10** - Finally it is not clear why poultry should be excluded from the requirement for all other species, that they **be inspected by the driver** prior to, during, and after the journey. The welfare of these animals can be influenced by a driver recognising a problem early.

Animals Australia strongly **recommends** that the exclusion of poultry from this Standard be deleted.

## **B11 - Sheep**

Sheep transport would be the next most numerous transported species in Australia, and may travel over very long distances due to the vast rangeland expanses. Whilst sheep appear resilient and are stoic, they like all other Australian livestock are particularly stressed by handling and transport.

### **SB11.1**

The total transport times/without water are excessive – sheep that travel over 24 hours, even in moderate temperatures (under 30 deg) have been shown to exhibit signs of dehydration and fatigue<sup>iii</sup>.

**Amended Standard:** Time of water must not exceed 24 hours for adult sheep, and 18 hours for lambs and pregnant ewes.

### **GB11.7**

Animals Australia **totally rejects** the related 'exception' for cold weather contingency in Southern Victoria to extend the time of water requirement. Plans must be put in place to ensure there is no need for such an extension, and/or a sheltered stop off point is used for a scheduled 'spell'.

### **GB11.2**

This Guideline effectively provides an exception for unfit animals to be transported and is totally rejected by Animals Australia. To allow these animals to be transported for any reason must require veterinary advice related to the individuals.

As such **this Guideline must be deleted**, and reliance would then be on **SA4.1 and SA4.2** (to allow exceptions for welfare reasons and under veterinary advice).

## Regulatory Impact Statement (RIS) – Comments:

There is considerable information provided in the RIS – but our focus has been primarily on the welfare benefits that the Standards must introduce, rather than the financial cost estimates. None of the currently offered options of course have costed the further recommendations for higher and additional Standards made by Animals Australia above.

### Options offered:

**B1 or B2?** In regard to the ‘options’ costed in the RIS, and as discussed above, Animals Australia certainly believes there is a strong case for ‘bobby calves’ to be older than 4-5 days when they are taken from their birth farm for transport to slaughter.

Therefore, our preference is for **Option B1** is clear in relation to the aspect of bobby calf age – though in our view the calves must be 10 days of age (rather than 8 days old) prior to transport (this option is not costed).

It is disappointing to note however that the RIS has provided only one side of the cost equation in regard to the transportation of older bobby calves, i.e. the costs of feeding them on farm for several more days. The RIS does not provide an indication of the financial benefits that may stem from transporting more robust calves – i.e. a lower mortality during transport and at the abattoir prior to slaughter, a higher value carcass due to its increased weight and ease of handling and processing the more mature animal. In fact this may be a cost neutral move, with the farmer therefore getting a higher price which covers the added cost of feeding and caring for the calves for those extra days.

### Higher standards re Time Off Water:

In regard to the higher standards proposed in **E1 & E2** related to time off water (and thus total transport time), neither option sufficiently reduces the journey/time of water intervals to meet the recommendations of Animals Australia. Both, with a preference of course for E2, are some improvement over the existing huge transport times of 48 hours for cattle, deer, goats and sheep, and are therefore preferred by Animals Australia over the current Standards (Option B).

Animals Australia totally rejects Options A, B, C and D, and recommends higher standards than those currently offered in each of B1 and E 1 and E2.

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Animals Australia  
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<sup>i</sup> Cave, J, Callinan, A and Woonton, W (2005). Mortalities in bobby calves associated with long distance transport. *Australian Veterinary Journal*, **83**, Nos 1 & 2: 82-84

<sup>ii</sup> Gregory, N & Wilkins, J (1989). Broken bones in domestic fowl: handling and processing damage in end-of-lay battery hens. *British Poultry Science*, **30**: 555-562

<sup>iii</sup> Knowles, T, Warriss, P, Brown, S, Brown, S, Edwards, J, Perry, A, Watkins, P & Phillips, A (1996). Effects of feeding, watering and resting intervals on lambs transported by road and ferry to France. *Veterinary Record*, **139**:335-339