

Submission to-  
Animal Welfare Standards Public Consultation  
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From-

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Occupation/sector-

Other-

Livestock producer with qualifications in Rangelands Management disciplines including animal welfare, nutrition, and behaviour, and with 25 years experience in land transport of cattle.

### General comments

#### **My comments are confined to the land transport of cattle by road.**

The Northern Australian pastoral area is characterised by large holdings, long distances from holding to sale, slaughter, or agistment, and often lesser quality roads on which to travel. It is also the case that holding facilities for offloading and "spelling" of animals travelling by road transport are infrequent or more likely non-existent.

The process of being moved is of itself a disturbance, and there is no evidence of which I am aware that being forced off unfamiliar transport into unfamiliar yards with unfamiliar food and water is beneficial to a travelling beast. The energy required to unload and then be reloaded, along with the extra time away from a near-normal environment, are all stressors. These are usually of greater importance where animals are in poor condition.

There is much difficulty in applying any standards which may be set by this process where facilities, or lack of them, mean that "spelling" is of itself a stress to the animal's physiological and/or mental state. This occurs where loading/unloading facilities are below standard, food and/or water is different tasting from the animal's home supply, animals are unfamiliar with humans.

#### **Comments on specific issues**

GA1.3 It is unreasonable to expect any livestock transport operator to be either willing or able to determine sub-clause ii), or to be able to take any appropriate action on any such suspicion.

#### ***GA1.3, ii), should be removed***

GB4.3 This clause refers to both a time and a distance limit for this class of calf. It is surely a typographical or drafting error to suggest that distance has any relevance to the welfare of the travelling calf. If for example 10 hours is accepted to be the upper limit of time, then at a speed of 100km/hour these animals will have travelled 1,000km. At 40km/hr they will have travelled just 400km.

#### ***The reference to distance should be removed completely from this clause***

In the same clause, the correctly identified importance of allowing animals to arrive at their final destination in as timely a manner as possible applies to travel for any purpose, not just for slaughter. Over 25 years of experience moving fit and healthy as well as drought-affected stock to sale, slaughter and agistment has demonstrated the value of completing the truck portion of the journey as promptly as possible.

***The default time limit should become 18 hours unless stock can reach their (unspecified) destination inside 24 hours.***

This then aligns with SB4.1 in the time limits for stock to be off water. This then also aligns with SA1.2.

***The requirement for offloading and spelling also needs to be dependent on availability of adequate facilities.***

Any assumption that for example the Roma Saleyards spelling yards are always available for spelling travelling stock must be tempered with the knowledge that at the most critical times of need, stock for sale may already have filled such holding areas. This is pertinent to GA1.6, i), final dot point.

GA2.2 begs the question of who exactly gets to see and assess any such documentary evidence, and in its absence what action would this unspecified person be expected or entitled to take?

***GA2.2 should be deleted***