



Australian Standards and Guidelines for the Welfare of Animals

Land Transport of Livestock

Public Consultation Submission

AgForce Queensland Sheep and Wool

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Introduction

AgForce Sheep and Wool is Queensland's peak body representing and promoting the interests of sheep and wool producers in Queensland.

Enhancing animal welfare is a key priority for the Queensland sheep industry therefore AgForce Sheep and Wool supports the Australian Animal Welfare Strategy (AAWS) and the Australian Standards and Guidelines for the Welfare of Animals Land Transport of Livestock to be consistently legislated and implemented nationally.



Part A General Standards and Guidelines for the Transport of Livestock

1. Responsibilities and Planning

AgForce Sheep and Wool supports the objectives of section 1- *Responsibilities and Planning*.

Standards

AgForce Sheep and Wool supports the standards SA1.1 and SA 1.2 as they are written in the Public Consultation Version (Version 29 February 2008).

For sheep producers to comply with SA 1.2, AgForce Sheep and Wool believes that they will be able to use the National Vendor Declaration (Sheep and Lambs) section relating to 'hours off feed and water before transporting' to provide information to the transporter. In the interests of simplicity and uniformity, it is important that the use of one existing industry documents such as the NVD can be used to comply with this standard.

Guidelines

Guideline 1.2 appears to be inconsistent with Standard 1.1 as follows:

- **GA 1.2** outlines that *'the livestock consignor is responsible for the livestock until they are loaded onto the transport vehicle.'* However standard **SA 1.1** **does not** include the consignor being responsible for the loading but the transporter being responsible *'for the loading'* under SA 1.1 iii).

AgForce Sheep and Wool recommends that the principles between the standards and guidelines must be consistent. Therefore **GA1.2** should be changed to read:

GA1.2 *'The livestock consignor is responsible for the livestock until they are to be loaded onto the transport vehicle.'*

2. Stock Handling Competency

AgForce Sheep and Wool supports the objectives for section 2- *Stock Handling Competency*.



Standards

AgForce Sheep and Wool supports standard SA2.1 as it is written in the Public Consultation Version (Version 29 February 2008).

Guidelines

AgForce Sheep and Wool recommends the following changes to the Guidelines for section 2:

- In **GA 2.2**, AgForce Sheep and Wool **does not** support evidence of competency needing to *'include the following:*
 - records of on-the-job training*
 - relevant records of experience*
 - recognised training and staff training registers*
 - induction training*
 - supervisor sign-off for specific tasks'*

Supporting evidence of competency should not require all of the listed elements. However supporting evidence could require one or more of the elements outlined. Records should not be required to demonstrate relevant experience. AgForce Sheep and Wool recommends that the following changes be made to GA2.2:

- GA2.2** *'Supporting evidence of competency should include any of the following:*
- *records of on-the-job training*
 - *relevant ~~records of~~ experience*
 - *recognised training and staff training registers*
 - *induction training*
 - *supervisor sign-off for specific tasks'*

The above changes are consistent with the LTS Glossary (Appendix 1) *Competency* definition on page 88.

This is also consistent with the OIE Guidelines for the transport of animals by land (Appendix 3.7.3) which outlines Competence in Article 3.7.3.4. as *'1. All people responsible for animals during journeys, should be competent according to their responsibilities listed in Article 3.7.3.3. Competence may be gained through formal training and/or practical experience.'*



3. Transport Vehicles and Facilities for Livestock

AgForce Sheep and Wool supports the objectives for section 3- *Transport Vehicles and Facilities for Livestock*.

Standards

AgForce Sheep and Wool supports standard SA3.1 as it is written in the Public Consultation Version (Version 29 February 2008).

Guidelines

AgForce Sheep and Wool generally agrees with the recommendations for the guidelines in section 3.

4 Pre-Transport Selection of Livestock

AgForce Sheep and Wool supports the objectives for section 4- *Pre-transport selection of livestock*.

Standards

AgForce Sheep and Wool supports the standards in section 4 as they are written in the Public Consultation Version (Version 29 February 2008).

Guidelines

AgForce Sheep and Wool recommends the following changes to the Guidelines for section 4:

- Guideline **4.4** is currently worded to imply that **all** of the provisions listed are appropriate for an animal considered not fit for transport.

‘Effective management of livestock considered not fit for the intended journey should include, but is not restricted to:

- effective containment in a suitable holding area*
- rest*
- provision of shelter, feed and water*
- veterinary treatment*
- humane destruction*



AgForce Sheep and Wool recommends the following changes to make the Guideline clearer.

'Effective management options for livestock considered not fit for the intended journey should include, but are not restricted to:

- effective containment in a suitable holding area*
- rest*
- provision of shelter, feed and water*
- veterinary treatment*
- humane destruction*

- **GA4.6** *'Access to water should be provided by the livestock consignor before loading if the total permitted time off water is reasonably expected to be reached during the intended journey and if this is an option to address the provision of water in the transport process'.*

At the Standards Reference Group meeting 6, it was agreed that GA 4.6 (previously a standard) be removed from the document. AgForce Sheep and Wool agrees that GA 4.6 be removed, we **do not** support the inclusion of GA4.6 anywhere in the document, as it does not make sense and adds nothing to the document.

5 Loading, Transporting and Unloading Livestock

AgForce Sheep and Wool recommends the following change to the objective for section 5 -'*Loading, Transporting and Unloading*':

'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.~~' The words *'recover their normal biological state within a reasonable time'* is very broad and are too subjective.



Standards

AgForce Sheep and Wool supports the standards outlined in section 5 of the Public Consultation Version (Version 29 February 2008), with the following comments:

- AgForce Sheep and Wool believe that the following additions should be added to **SA5.1** to make the Standard clearer:

*'The person receiving the livestock must make arrangements for separating weak, ill or injured livestock for rest, recovery **and** appropriate treatment **or** humane destruction and disposal of dead livestock.'*

- **SA5.7** – AgForce Sheep and Wool supports the use of electric prodders if used sensibly and sparingly. Therefore we support the compromise and restrictions on the electric prodder use, as detailed in **SA5.7**. It should also be noted that SA 5.7 ii) that *'Electric prodders must not be used on livestock under three months of age'* is of a higher standard than the OIE Guideline in Article 3.7.3.7.3.
- **SA 5.8** – AgForce Sheep and Wool supports the compromise on when dogs should be muzzled, as detailed in SA 5.8. We do not believe that it should be mandated that dogs must be muzzled at all times.
- AgForce Sheep and Wool believe that there should be consistency in language throughout this document so would like to recommend the following changes to **SA5.9**:

*'Drivers must ensure that the ramp and the vehicle are properly aligned and that any gap between the ramp and the vehicle is sufficiently narrow to **minimise the risk** of injury during loading and unloading.'*

- AgForce Sheep and Wool suggests that the following word should be added to **SA5.19** as humane destruction may not always be the solution if a road accident occurs. As the Standard is currently written it implies that all three steps must be taken.



‘Where there is a road incident involving the transport vehicle, all livestock must at the first available opportunity be:

- i) assessed, in the standing position if possible,*
- ii) removed for treatment, or*
- iii) humanely destroyed at the accident site*

Guidelines

AgForce Sheep and Wool recommends the following changes to the Guidelines:

- For **GA 5.12**, the reference to ‘*dogs that bite should be muzzled*’ should be removed as it is covered by the standard **SA 5.8**. AgForce Sheep and Wool suggests the following change:

‘Dogs should be appropriately trained to move livestock and be responsive to commands. ~~Dogs that bite should be muzzled at all times when working livestock.~~ Dogs should be provided with water and rest after working.’

- **GA 5.19** ‘*where there is concern about the assessment of fitness to load, veterinary advice should be sought*’ is not required as this is sufficiently covered by the standard **SA 4.2** where ‘*any livestock judged as not fit for the intended journey must only be transported under veterinary advice*’
- **GA5.34** contradicts the note on the following page which recommends feed should not be provided during short spells of less than 12 hours. AgForce Sheep and Wool recommends the following changes:

‘During a voluntary spell, in addition to water and space to lie down, livestock should be provided with the following additional provisions:

- *access to appropriate food if the spell is greater than 12 hours*
- *enough space for exercise*
- *separation appropriate to the travel group*’
- The way that **GA5.47** is currently worded implies that all the provisions listed are appropriate for an animal considered not fit for transport. AgForce Sheep and Wool believe that the following addition makes the Guideline clearer, for example humane destruction will not necessarily be the answer for every unfit animal.

‘Effective management options for livestock considered not fit for the intended journey should be, but are not restricted to...’



6 Humane Destruction

AgForce Sheep and Wool supports the objectives for section 6- *Humane Destruction*.

Standards

AgForce Sheep and Wool supports standards in section 6 as they are written in the Public Consultation Version (Version 29 February 2008).

Guidelines

AgForce Sheep and Wool has no recommendations for the guidelines in section 6.



Part B Species Standards and Guidelines for the Transport of Livestock

B11 Specific Requirements for the Land Transport of Sheep

Standards

AgForce Sheep and Wool supports the standards in section B11 as they are written in the Public Consultation Version (Version 29 February 2008). The following comments outline the rationale for AgForce Sheep and Wool's support.

- **SB 11.1**

AgForce Sheep and Wool strongly supports the water deprivation times outlined in SB11.1. AgForce Sheep and Wool believes that there is no need to include a 'normal' and 'extended' time as previously outlined in the Draft Land Transport of Sheep MCOP. The additional considerations for a longer journey are already adequately addressed throughout the standards. For example, SA 5.2 sufficiently outlines that *'Time off water must be managed to minimise risk to the welfare of the livestock according to:*

- i) the increased risk to livestock welfare of longer journeys up to the permitted time off water;*
- ii) assessed fitness of the livestock for the remainder of the intended journey.'*

Also regardless of journey length, SA 5.11 outlines *'that the driver must inspect livestock within the first hour of the journey and then at least every three hours or at each rest stop'*. Therefore, from 36 to 48 hours the animals will be inspected at least 4 separate times. Finally under SA 5.14, *'the driver must make arrangements or take action during extreme hot or cold conditions to minimize the risk to the welfare of livestock.'*

In the sheep species specific section, GB11.1 also outlines the considerations that should be made for long distance travel of sheep.

Research conducted by CSIRO Livestock Industries, *Ferguson & Fisher et al (2007)* supported that sheep *"in good physiological condition can cope with periods of up to 48 hours of food and water deprivation without any major deleterious affect to their welfare."*

The permitted time off water of 48 hours for Australian sheep is not unique when looking at other international codes for transport. For example the *Recommended Code of Practice of the Care and Handling of Farm Animals –Transportation* (Canadian Agri-Food Research Council 2001) has stipulated a maximum transport time of 48 hours for sheep (Table 4



on page 13) and 5.5.2 outlines that *“Total time in transport and lairage during which the animals have not received feed and water from the premises of origin to final destination, should not exceed 52 hours for cattle, sheep and goats”*.

- **SB11.2**

AgForce Sheep and Wool does not support the 36 hour spell suggested for animals over 4 months that have reached the 48 hour water deprivation threshold, rather we would suggest a minimum 24 hour spell.

The research undertaken by CSIRO on behalf of MLA does not adequately address this standard. The research indicates that following a 24 hour rest period sheep had recovered most metabolic indicators yet did not test if they could cope with another transport event of up to 48 hours.

AgForce Sheep and Wool supports the spell period in SB11.2 remaining at 24 hours for sheep over 4 months unless further research is done using an additional transport event and the results indicate an opposing view.

Representatives from CSIRO did not raise the issue of extending the spell time following a 48 hour water deprivation period to 36 hours until the final stages of SRG 6. The research had not been completed and had not been made available to SRG members – indicating that this has been an example of a very poor process.

Guidelines

AgForce Sheep and Wool recommends the following changes to the Guidelines:

- **GB 11.7**

AgForce Sheep and Wool recommends 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. 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. Having a guideline to use only as a defence is not adequate.

As outlined in ‘GB11.7 iii) *the additional time off water is spent on a stationary vehicle or in a facility*’ clearly restricts additional time to be a benefit to the livestock in a stationary vehicle (not for the driver to have extra time to get the animals to their destination). Also the additional document in ‘GB11.7 iv) *a document states the location, date, start and finish times of the delay*’ clearly allows the additional time to be audited and verifiable.

- **GB 11.8**

AgForce Sheep and Wool strongly supports GB11.8 and the minimum space allowance remaining as a Guideline (as distinct to a Standard), particularly considering the minimum space allowance table for sheep is calculated based on wool length, live weight and no horns. This guideline can be used to assist livestock producers and transporters to achieve part of standard SA 5.3.

The minimum space allowance for sheep should be determined with consideration of many variables (as outlined in SA 5.3) including the class of animals, size and body condition, wool length, horn status, climatic conditions and the nature of the intended journey. Therefore more variables need to be considered than outlined in the table in GB 11.8.

The OIE Guidelines for the transport of animals by land (Appendix 3.7.3) also highlights the range of variables associated with determining loading density. For example Article 3.7.3.5. outlines:

- 6 g) *‘Other factors which may influence space allowance include:*
 - i) *Vehicle/container design*
 - ii) *Length of journey*
 - iii) *Need to provide feed and water on the vehicle*
 - iv) *Quality of roads*
 - v) *Expected weather conditions*
 - vi) *Category and sex of the animals.’*



Regulatory Impact Statement

AgForce Sheep and Wool supports the need for the Regulatory Impact Statement (RIS) for the Australian Standards and Guidelines for the Land Transport of livestock.

1. RIS Options

AgForce Sheep and Wool supports '*Option B: the proposed standards*' based on the animal welfare outcomes and that the '*expected costs are considered to be outweighed by the expected benefits*'.