

Submission:- Australian standards and guidelines for the welfare of animals- Draft Land Transport Standards and associated Regulatory Impact Assessment.

Prepared by: Pam Ahern

365 McHargs Road

Willowmavin, Vic 3764

Ph: 0408 397 301

Email: pamahern@activ8.net.au

Australian standard and guidelines for the welfare of animals-land transport of livestock Public Consultation Version

Comments

2 Stock Handling Competency

SA 2.1 The standard provides for the person to be competent

Recommendation it is a very grey area as to what constitutes competency. A better requirement for improved animal welfare would be for the person to have undertaken compulsory training and or accreditation

3 Transport vehicles and facilities for livestock

Recommendation it is noted that no provision is made for the requirement of transport vehicles to be cleaned of excrement after use or inspected prior to use to ensure vehicle is clean. Failure to do so poses health and welfare risks to livestock. Standard should include compulsory cleaning of vehicle after use and inspection prior to use to ensure no waste material remains.

5 Loading, transporting and unloading livestock

SA5.6 Deals with livestock handling. Recommendation that dragging of stock should be specifically forbidden and included in the standard.

SA 5.6 ii) Provides for stock less than three months to be picked up by a single leg. Recommendation such handling practices subject young animals to stress and trauma. Subjects immature bones and ligaments to undue stress in addition to the psychological trauma of the animal being moved upside down. This is totally inappropriate with good animal welfare and should not be allowed except for piglets under 2 months whose ligaments and joints can support this, however it should be a last resort.

GA 5.48 This entire section needs to be strengthened to include the humane destruction of non ambulatory animals once they have been identified without the animal being moved. Rather than being a guideline this should become a standard operation. Shocking footage has recently emerged from America of non ambulatory animals being shifted prior to being killed; such scenes are unacceptable from an animal welfare point of view.

Greater emphasis and penalties need to apply to consignors responsible for the transportation of non-ambulatory animals.

SA5.7 Provides for restricted use of electric prods.

Recommendation no electric prod use to be permitted on any species. Electric prods be replaced with other driving aids such as flags, plastic paddles, "Matador cape" (sheet of lightweight plastic) or a stick with plastic ribbons attached to it. When animals show reluctance to move the reason behind the balking should be sourced and the distraction removed where possible.

SA 5.14 More specific requirements should be in place for action that needs to be taken when transporting animals in extreme weather. With particular reference for any animals that are in direct exposure to weather conditions. When extreme temperature excesses are anticipated no transport to be undertaken unless special circumstances warrant.

Part B Species standards and guidelines for the transport of livestock

B4 Specific requirements for the land transport of cattle

Of particular concern is the handling and early transport of bobby calves. Considered a low value bi-product of the dairy industry more emphasis should be placed on their welfare. In particular SB 4.5 allows for bobby calves to be transported after not more than 18 hours since their last feed. This time lapse is too long and would cause suffering to immature and fragile baby animals. Age at transport is also a concern, five days old is considered very young.

Age at travel should become a standard (enforceable) and not be a guideline (unenforceable).

GB4.12 Transportation of bobby calves. This should be a standard and not a guideline.

B10 Specific requirements for the land transport of poultry

GB10.23-10.26 Recommendation; that carrying of multiple chickens by their legs is unacceptable and this to become a standard not a guideline. Chickens with fragile bones can suffer breakage as a result or hip displacement.

B11 Specific requirements for the land transport of sheep

GB 11.11 this should be a standard and not a guideline

General comments

Stocking density should be a standard for all species and not a guideline.

Management of animals in extreme weather should be a standard for each species. In particular pigs (a species which is particularly subject to heat stress) need special attention in hot weather, those on the top layer being subject to direct rays of the sun. No provision is made to counter this as a standard.

Fit to load provisions are too weak for many species. EG pigs with hernias or prolapses that almost touch the ground may be transported. Standards should only provide for the transport of animals that are in good health, sick animals should be treated or humanely destroyed if untreatable.