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TO:

Animal Welfare Standards Public Consultation.
P.O. Box 196
Dickson ACT 2602

RE: Draft Standards on Animal Transport.

It is our opinion that the proposed draft standards do not go far enough in their suggested application. Many of the guidelines should become legally enforceable standards of care. It is our firm opinion that we owe a standard of care to all animals involved in agriculture – a much higher standard than that presently given and a much higher standard than purely commercial operators can be relied upon to advocate – so that animals might suffer much less, and that a higher quality of animal goes on for slaughter. It is also our firm opinion that assessment and enforcement of standards should be a transparent and independent process. As a member of the public, we do not believe commercial operators can be relied upon to self-assess their success in meeting standards embodying public and non-commercial principles of conscience and health. We ask that enforceable standards be appropriately backed by adequate funding for independent, random and unannounced review and inspection of operators.

Thank you for taking the time to consider our submission.

RE: SA 5.7 (The use of electric prodders)

Being that use and misuse is difficult to measure in terms of animal welfare and in terms of prosecution we suggest that electric prodders must not be used.

RE: SA 5.8

Dogs that have direct contact with any livestock should be muzzled at all times. The term 'habitually bite' is vague and an impossible criteria for infrequent inspections to substantiate. Dogs that may eventually be shown to 'habitually bite' would have already injured and stressed many animals. *There is also the issue of cross-infection between dogs and livestock, possibly passing on disease to animals for slaughter.*

RE: SA 5.6 (Dragging of animals that can't or won't walk)

These animals are most likely dehydrated/exhausted/unwell and distressed from their journey and their 'time off' water.

All transported animals need places to lie down comfortably and 'time off' water to be reduced. This may result in less animals being unable to walk due to exhaustion and dehydration.

Animals that cannot/won't walk must not be dragged at any time. This, in our opinion, is tantamount to prosecutable cruelty.

Animals that are unable to walk may also have been diseased/unwell at time of loading. Transporting of sick creatures for slaughter is obviously unacceptable. Again, in our opinion, the question is 'How did a sick animal get this far without attention/treatment?'

The root of the problem should be attended to deal with the symptoms.

RE: Transport of Pigs.

Pigs are intelligent, sensitive, and social creatures and very susceptible to weather extremes. They become dehydrated very quickly during transport due to sun exposure and the exhausting work of standing up in a moving truck. They need places to lie down comfortably, in straw, not sawdust.

Sows and their piglets and pregnant sows should not be transported for any reason but their health and welfare, and for short distances only.

At no time should a pregnant/lactating sow be without water.

RE: Transport of Sheep.

“Time off” water must be reduced. GB11.7 seems to indicate “time off” water can be allowed to exceed the **already overly excessive** 48 hours.

Time off water should be reduced to 24 hours maximum and made a standard. At the VERY least GB11.1 should be a standard.

I believe issues such as exhaustion/falling over/being trampled/injured may be greatly reduced if time off water is reduced to 24 hours (and made an enforceable standard).

RE: SB 4.1 Transport of Cattle.

The same issues for sheep apply to cattle re: time off water/feed. Time off water should be limited to 24 hours maximum.

Calves must be provided with a comfortable surface to lie down in, i.e. NOT sawdust. GB 4.11 should be a standard.

RE: Transport of Poultry.

Temperature extremes must be addressed and appropriate standards must be adopted. Currently, we believe there are NO standards relating to issues of thermal extremes for poultry.

GB 10.9 and GB10.14 should be made standards. Transport must not take place if the temperature in the truck cannot be controlled at a comfortable range under 30 deg C. Numbers of birds per container must be controlled as to minimise issues of heat stress.

GB 10.13 should be a standard.

GB 10.16 and GB 10.17 must be standards. Trucks must park in a shaded area when temperature of a stationary truck is over 30 deg C.

Thank you for reading our comments and concerns.

We look forward to hearing the decisions that are made. As mentioned above, we believe many of the guidelines currently under debate must be made standards to protect public conscience and health. We hope that the decision makers that determine the final standards act in the best, and long-term, interest of the public and the animals under our duty of care. While our nation is a primary producer, and so our national interest rests in no small measure in

animal agriculture, that is not a blank cheque for exploitation and virtual slavery of other species. We need a rational, well planned and compassionate direction forward out of the 'too big' basket of animal welfare for livestock, for both the animals and Australian's whose current livelihood depend on them.

"We can judge the heart of a man by his treatment of animals."

Immanuel Kant

"There comes a time when one must take a position that is neither safe, nor political, nor popular, but he must take it because his conscience tells him that it is right."

Martin Luther King

"Anyone who has accustomed himself to regard the life of any living creature as worthless is in danger of arriving also at the idea of worthless human life".

Albert Schweitzer

The greatness of a nation and its moral progress can be judged by the way its animals are treated"

Mohandas Gandhi

With respect,

Rebekkah Osmond.
Steven Lord.