

To whom it may concern,

Re: Public Consultation

Australian Animal Welfare Standards and Guidelines :

Land Transport of Livestock

Rural Solutions SA is very keen to see best practices and standards developed with regards to the land transport of camels.

Rural Solutions SA Animal and Plant Control (APC) team is working in a number of areas to minimize the impact of animal and plant pests, and has developed several regional pest plans for NRM boards in South Australia, including plans for feral camel management.

Rural Solutions SA has a skilled team, knowledgeable about camels, working on a national campaign to remove feral camels from the landscape, in a way that sees the many resource values of camels utilized. Currently feral camels are "shot and lay to waste".

Although small numbers of feral camels are already captured and transported for live export, or for slaughter at abattoirs, the rapidly increasing feral camel population (expected to be ~1,000,000 by the end of this year) and the ongoing drive for the development of a camel industry, will see the numbers of feral camels requiring transport from remote regions to abattoirs or to properties for domestication, increase substantially.

Rural Solutions SA is very keen to adopt and promote best practices throughout a camel industry, including best practices for feral and livestock camel transport.

As such please find attached our comments on the Draft Australian Animal Welfare Standards and Guidelines: Land Transport of Livestock.

The attached comments and this cover letter have also been faxed to your organisation.

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<<RECOMMENDED CORRECTIONS Re Draft Livestock Transport Standards.doc>>

RECOMMENDED CORRECTIONS to:

THE DRAFT AUSTRALIAN STANDARDS - LAND TRANSPORT OF LIVESTOCK (B3 SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF CAMELS)

Standards

General standards in Part A also apply, to minimise risks to the welfare of camels during transport.

SB3.1 Time off water must not exceed the time periods given below:

Class	Maximum time off water (hours)
Camels over 6 months old	48 hours ⁽¹⁾
Camels under 6 months old ⁽²⁾	48 hours
Camels known to be more than 9 months pregnant excluding the last 4 weeks	24 hours

SBXX (3) If camels over 6 months old have been off water for 48 hours, they must be spelled for **24 hours** (4) before starting another journey.

If camels **known** to be more than 9 months pregnant, excluding the last 4 weeks, or lactating cows with calves at foot, or calves 1-6 months old, have been off water for 24 hours, they must be spelled for 12 hours before starting another journey

SB Journey times for camels over 6 months old, excluding camels known to be in the final month of pregnancy, may be extended to 72 hours only under the following conditions:

- camels must be watered and fed on the vehicle every 24 hours
- there must be space for all camels to sit down
- regular assessments must be made that the camels are fit for the remainder of the intended journey
- camels must be allowed a spell of 24 hours before starting another journey.

SB Camels under 12 months old must not be carted in the same pen as adult camels. (5)

SB3.4 Camels known to be in the last 4 weeks of pregnancy must be transported under veterinary advice unless the journey is less than 4 hours.

SB3.5 **At rest** (6), camels must have a minimum of 100 mm clearance between the top of their hump and the livestock crate.

SB3.6 Electric prodders must only be used on camels after reasonable actions to cause movement have failed.

SB3.7 Dogs must not be used to move camels.

SB3.8 Approved methods of humane destruction for camels over 6 months old are firearm, captive bolt or lethal injection.

Approved methods of humane destruction for camels less than 6 months old are firearm, captive bolt, lethal injection or blunt trauma. Blunt trauma must only be used on camel calves that are less than 24 hours old, and only when there is no other approved option for humane destruction.

Remove note (7)

GUIDELINES

General guidelines are also recommended in Part A to minimise the risk to the welfare of camels during transport.

Fitness

GB3.1 Conditions that could cause camel welfare to decline during transport and should be considered unfit for transport might include lethargic camels and camels with profuse diarrhoea, disease, or wounds (8). A decision to transport a camel should be made after considering the welfare of the animal concerned, as well as the treatment and management options.

Food and water

GB3.2 Camels should be fed and watered as soon as possible after unloading.

GB3.X **Domesticated (9)** camels should be trained by progressive extension of water deprivation time before going without water for longer periods of time than they are used to.

GB3.3 Dehydrated camels may gorge themselves when reintroduced to water. And though this is rarely with adverse effects to their welfare, camels should still be monitored carefully when reintroducing them to water following transport. (10)

GB3.4 Camels in the third trimester of pregnancy should not be deprived of water for more than 12 hours and they should be spelled for 12 hours before starting another journey.

GB3.5 Camels more than 12 months pregnant should be transported under the following provisions:

- veterinary advice should be sought. (11)
- water deprivation time should not exceed 8 hours
- feed and water should be provided immediately before loading and upon unloading
- additional space should be provided on the vehicle
- different classes of camels should be segregated

Loading density

GB3.6 The following space allowances should be provided:

Mean Liveweight (kg)	12.2m X 2.4m (12) (deck)
Less than 250	30-32
250–300	28
300–350	26
350–400	24
400–500	20
500–600	18
600–700	16

Removed footnote re standing and sitting room (13)

Vehicles and facilities

GB3.7 Yards should have race walls with a height of 1.8 m, and metal loading races should be covered with dirt to avoid excessive noise and foot damage. Yards should be large enough to allow all camels to **sit (14)** down at the same time.

GB3.8 Camels should spend as little time as possible on hard surfaces that can cause injury to foot pads or which can wear the pedestal and kneeling pads of the animal. Cross cleats must either be removed from trucks or covered totally with a generous layer of hay, straw or sand. Failure to do so will injure the pedestal and the pads on the legs. Surface bedding should be checked during a long trip.(15)

GB3.9 Livestock crates for the land transport of camels should allow for a resting hump clearance of 100mm. When moving, the highest part of the camel is the hump, while the head is generally lowered. Walking hump height is 100 mm–200 mm lower than resting hump height. Thus gates and stays may be lower than the bows of a crate as long as resting hump height clearance is appropriate. (16)

GB3.10 Large camels should be transported in single deck vehicles or a crate with a vertical clearance of 2 m, unless the crate construction allows for hump height clearance as specified above. Yearling camels may be transported in double decks provided they do not contact overhead structures.

Handling

GB3.11 Camels left on the vehicle during driver stops should be parked under shade in hot conditions, where possible. (17)

GB3.12 Camels may be temporarily tied in sternal recumbency to prevent injury. If camels are to be tied up in **sternal recumbency (18)**, they should be released and allowed to stand at least every four hours.

GB3.13 Camels tied to trees or other structures by ropes or halters that are attached to the neck should not be left unattended. (19)

GB3.14 Electric prodders should only be used on camels as an absolute last resort. Humane destruction

Humane destruction

GB3.15 Trained camels should be sat down before humane destruction.

GB3.16 For the humane destruction of camels, a firearm should deliver at least the power of a standard 0.22 magnum cartridge. (20)

GB3.17 For mature bull camels and especially bulls in rut, the captive bolt, if used, should only be applied to the poll position. Bulls in rut develop thick glands at the top of the head that prevent the effective use of the captive bolt by the frontal method.

COMMENTS RE RECOMMENDED CORRECTIONS:

THE DRAFT AUSTRALIAN STANDARDS – LAND TRANSPORT OF LIVESTOCK (B3 SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF CAMELS)

(1) Allow maximum time off water for camels to be 48 hours.

Maximum time off water is given as 48 hours for cattle, goats, deer, and sheep over 6 months old. And puts buffalo and alpaca wethers at 36hours. It seems unreasonable that the maximum time off water for camels would not also be at least 48 hours, given that of all livestock transported, camels have the lowest requirement for daily water.

(2) Provide provisions for the transport of camels under 6 months old, and allow them also to travel for 48hours without water (as for camels over 6 months).

- In the Abridged Regulatory Impact Statement for the Australian Standards and Guidelines, it states
 - “standards represent the accepted minimum level of welfare to be provided... “
 - and “simple written standards that focus on broad outcomes are necessary for some of the important livestock welfare issues.” (p. 15 RIS – Abridged).
 - It also states “Livestock may be subjected to longer periods of water deprivation during transport than those permitted in normal management situations, where the livestock are capable of tolerating this stress.” (p. 21 RIS-Abridged).
 - “The maximum possible times that livestock are without water specified in Part B do not diminish the responsibility of the person in charge to assess livestock as being fit for the intended journey at various times....as considered appropriate...” (p. 21 RIS – Abridged).
- Camels are one livestock capable of tolerating greater periods of water deprivation. (see Camels A compendium Series C, No 22 – Dr G W Manefield and Dr A H Tinson, p296 “Water Intake”)
- Unweaned camels are very unlikely to drink water offered. (as for other unweaned animals)
- Currently specialised, self contained vehicles able to provide water on transport vehicles are not common, and thus the mandate to water camels will require the unloading and reloading of animals.
- It is impractical to mandate that camels under 6 months old be loaded and unloaded more frequently en route than older camels, given that the added stresses, and the delay in arriving at their destination, are more likely to be counterproductive to the welfare of these camels.

(3) Include the clause, as for cattle, which provides requirements for the transport of camels in 48 hours.

Changing the requirement to 48 hours max without water should cover most intrastate and interstate feral camel transport requirements except where quarantine requirements insist that camels be offloaded. The inclusion of this would also help standardise the format as for other the transport of other livestock.

(4) Provide a spell time between journeys to be 24 hours

Camels rehydrate quicker than other livestock thus a shorter spell time en route than that required for other livestock is sufficient.

“It is dangerous to allow dehydrated animals of some species free access to water. Among those that can safely replenish water deficits quickly the camel is probably the king. It has been known for a 600kg camel with a deficit of 200L to drink that amount in 10min....There are some reports that suggest that camels have the ability to quickly replace a deficit right to the litre at one drink. Other work suggests the more likely replenishment of 60-65% at the first drink and the remainder over the next 1-3 days....”

It is recommended that camels should not be placed under any physical stress for 24 to 48 hours after full water deficit replenishment.” (Camels A compendium Series C, No 22 – Dr G W Manefield and Dr A H Tinson, p296 “Water Intake”)

The longer spell times are for feral camels the more difficult, and stressful, it is to reload them following the spell. A shorter spell time is more preferable to longer spell times in transit. 12 hours to rehydrate camels is more than ample, and 24 hours would make the reloading of feral camels more manageable than after 36 hours.

(5) Pen young camels separately to older camels during transit

Young camels may get squashed by older camels and should travel separately.

(6) Say “at rest” to be consistent with elsewhere in the document.

(7) Remove the note under the table

I am not sure that feral camels are usually watered on transport vehicles. So far no one I have spoken to waters feral camels whilst on transport vehicles, thus feral camels are generally unloaded for watering. The note that unloading should be avoided for biosecurity reasons then seems quite contradictory to the points made above. Changing the requirement to 48 hours max without water should cover most intrastate and interstate camel transport requirements except where quarantine requirements insist that camels be offloaded, in which case the note that unloading for spells be avoided for biosecurity reasons cannot be met anyway.

(8) Remove abscesses from the list of concern.

Abscesses are very common on feral camels and are not necessarily a concern for camels for slaughter or relocation as live animals for the purposes of livestock management. “In Australian feral camels, whose browsing patterns necessitate close contact with many sharp branches and thorns, 80% of the animals may be affected”. (Camels A compendium Series C, No 22 – Dr G W Manefield and Dr A H Tinson, p242 “Skin Abscess”).

(9) Put in the word “Domesticated”

The need to train camels to deprivation of water is not likely to be necessary for feral camels, but may be more of a concern for domesticated camels. “Consensus indicates that (feral) camels drink once per week during summer, every 7-10 days in spring and autumn and every 4-6 weeks in winter. In 30-35oC air temperatures visits to water points by free ranging camels will be sporadic. With temperatures >40oC visits are likely to be regular at intervals of 3-7 days.” (Camels A compendium Series C, No 22 – Dr G W Manefield and Dr A H Tinson, p297)

(10) Rephrase so as not to over exaggerate the need to monitor camel watering

It is excessive to suggest that reintroducing water to camels is more dangerous than for other livestock species such as cattle, sheep or goats. There is no mention for cattle to be overly concerned with their rehydration. If the maximum time without water is 48 hours, then camels are not likely to be seriously dehydrated. Also: “Among those that can safely replenish water deficits quickly the camel is probably the king. It has been known for a 600kg camel with a deficit of 200L to drink that amount in 10min....There are some reports that suggest that camels have the ability to quickly replace a deficit right to the litre at one drink. Other work suggests the more likely replenishment of 60-65% at the first drink and the remainder over the next 1-3 days....It is recommended that camels should not be placed under any physical stress for 24 to 48 hours after full water deficit replenishment.” (Camels A compendium Series C, No 22 – Dr G W Manefield and Dr A H Tinson, p296 “Water Intake”)

(11) Put the dot point that “veterinary advice should be sought” first

By putting the dot point “that veterinary advice should be sought” first, might indicate that this situation is more for trained, domesticated camels than feral camels.

(12) Check dimensions of truck deck

Other documents (e.g. Model Code of Practice for the Welfare of Animals. The Camel (SCARM 86)) has the deck size as 12.2m X 2.4m (not 2.3m). I assume this is a typo.

(13) Remove footnote re differences between standing and sitting numbers

Not sure that a note under the Loading Density table about sitting room is necessary. The difference in standing and sitting requirements relates more to the need for camels to have neck room whilst sitting. However, this would not impact enough on the numbers of camels that can be loaded in a way that would change the loading density. Camels that fit standing, fit sitting. The note could make for unnecessary confusion.

(14) “Lie” down has been replaced with “sit” down.

Camels can sit (cush, sternal recumbency) which involves resting on their pedestal. However as they can also lie down on the sides, I think it should be clearer in the standards by using the word sit (cush) where that is what is meant. Room to lie down on their sides is significantly greater than the room needed for them to sit down on their pedestal.

(15) Include sentence about removing cleats and protecting camels from hard surfaces

The extra sentences are taken from the Model Code of Practice for the Welfare of Animals. The Camel (SCARM 86). However, in keeping with the structure for guidelines, the word “must” was replaced with “should” ...check bedding on long trips.

(16) Rephrased this sentence.

Found the sentence structure in this point difficult to interpret. Modified for easier interpretation.

(17) Rephrased for clarification of point.

I don't understand the intent of this guideline. Is it that camels should be left on the truck, or that camels left on the truck should be in the shade when possible??

(18) Shifted sentence from GB3.13 to GB3.12 and included the words “sternal recumbency”

Confusion could result here if this phrase was interpreted to mean camels tied by ropes or halters.

(19) Stipulate that camels tied by ropes should not be left unattended

There are many ways to tie camels to trees or other structures, and they have their advantages and disadvantages. Thus there are no failsafe methods and camels tied by ropes to structures should not be left unattended.

(20) Remove “and, for calves, a firearm should deliver at least the power of a standard 0.22-long rifle cartridge.”

There is concern by skilled government marksmen, that including these words, may result in confusion leading to the inappropriate use of underpowered calibre on larger animals.