

**ANIMAL WELFARE STANDARDS PUBLIC CONSULTATION –
DRAFT STANDARDS FOR THE LAND TRANSPORT OF LIVESTOCK**

NAME: Sue Leitch
ADDRESS: Brookwood Alpacas “Elanda” 130 Bingham Rd, Bullsbrook WA 6084
CONTACT: 08 9571 1787 or 0427 196 179
EMAIL: brookwoodalpacas@bigpond.com or ceo@dogshome.org.au
SECTOR: Livestock producer – alpacas

By way of background, I have been breeding alpacas for the past 10 years and am currently caring for in excess of 150 alpacas. I have also had experience over the past few years of transporting alpacas by road from WA to the eastern states to compete in shows and events. This has given me significant insight into the management issues associated with long distance road travel of these livestock.

DRAFT LAND TRANSPORT STANDARDS – Public Consultation Version 29 February 2008

Principles relating to the transport of livestock

I agree with the principles relating to the transport of livestock as espoused in the above referenced document.

Part A - General standards and guidelines for the transport of livestock

General comments

In Appendix 1 - the Guide to the above standards – there are definitions, or an attempt at clarification, of the meanings of ‘standards’ versus ‘guidelines’. It states that ‘The standards represent the accepted minimum level of welfare to be provided.’ The Guide also states that the ‘...guidelines are regarded to be a better welfare position than that described by the standards.’ but the guidelines are ‘... not meant to be ‘best practice’.

While I can understand that the guidelines are meant to build on the minimum welfare position represented by the standards, if the guidelines are considered to represent a better welfare position than the standards, then I am at a loss to understand why they would not then constitute ‘best practice’. Such subtleties, if they are required to exist, need far greater clarification than currently provided in the Guide.

Responsibilities and planning

Consider that the standards and guidelines meet the objectives.

Stock handling competency

Consider that the standards and guidelines meet the objective.

Transport vehicles and facilities for livestock

Consider that the standards and guidelines meet the objective.

Pre-transport selection of livestock

SA4.2 Assume that the reference to 'under veterinary advice' included in this standard is intended to cover situations where livestock, that would be considered under SA4.1 as 'not fit' for travel, are actually being transported to a veterinary practice for treatment and care.

Suggest that as the wording of this standard is a little ambiguous that a guideline redressing this is required.

SA4.3 This standard, as currently written, effectively countermands the previous SA4.2, and works to prevent a livestock owner from transporting livestock for veterinary care. To overcome this problem, the standards should incorporate a reference to only supplying livestock that are assessed as fit for the intended journey, unless the livestock are being transported for veterinary care.

Loading, transporting and unloading livestock

Consider that the standards and guidelines meet the objectives.

Humane destruction

Consider that the standards and guidelines meet the objective.

Part B – Species standards and guidelines for the transport of livestock

B1 –Specific requirements for the land transport of alpacas

Standards:

SB1.1 Consider that there should be variations to the proposed time off water for some classes of alpacas as follows:

Wethers over 12 months should be treated the same as for non-pregnant females and non castrated males over 12 months as their physiological requirements are no different. Consider that the maximum time off water for all non pregnant alpacas over 12 months should be 24 hours.

Lactating alpacas with crias up to 6 months old should be treated as for heavily pregnant alpacas with the allowable time off water extended to 4 hours. It is a common industry practice to transport lactating alpacas, with their cria, for service to a stud male soon after the cria's birth. Many alpaca breeders are located on the fringe of our major capital cities and towns and most journeys across such centres will take longer than 2 hours. From my experience being able to safely park a transport vehicle in such locations can be very difficult and so requiring a breeder to stop to offer water en-route is likely to be a greater risk to the welfare of the alpacas. Also, in my experience as a breeder over the past 10 years, most alpacas with cria up to about 2 months old will be more settled with their cria and likely to water once the destination has been reached and they are off the transport vehicle.

Crias up to 6 months old and not being transported with their dam, should be broken down into 2 sub-sets – one for crias up to 2 months and one for cria from 2 to 6 months. The proposed maximum allowable two hour time period off water for the younger cria should be extended to 3 hours, and that for the older cria extended to 4 hours. This suggested timeframe is based on the usual, and successful, industry practice of bottle feeding orphan cria 3-4 hourly up to the time the

cria are about 2 months old, and then extending that time frame out to 4-6 hourly intervals for cria from 2 months old. It is also unusual to transport young cria, up to say 4 months, without their dams, unless the cria is requiring veterinary care and attention. It is therefore likely to be in the interests of the cria to be transported as quickly as possible, rather than stopping for water.

SB1.1 includes no provision for time off water for alpacas in their last month of pregnancy and yet SB1.4 does allow the transport of such alpacas if the journey is less than 4 hours or it is under veterinary advice. Suggest that there should be a standard set for time-off water for this class of alpaca as shown in GB1.4 ie 2 hours, with the guideline recommending that such heavily pregnant alpacas only be transported if requiring veterinary attention or associated treatment.

SB1.2 Consider that if alpacas are likely to be on a transport vehicle for longer than 12 hours that they should have space to be able to both cush and turn around. Therefore suggest that the minimum standard set out in SB1.2 (ii) should include space to turn around and cush.

SB1.3 As noted above under SB1.1, do not consider that there should be any distinction made between castrated or non castrated male alpacas and all adult alpacas which have been off water for 24 hours should have a spell of 12 hours before starting another journey.

S.B 1.4 See note above under S.B1.1

S.B1.5 to 1.7 Accept these standards.

Proposed new standards:

Consider that the guideline relating to alpacas having the space to cush should be a standard regardless of travel time. Most alpacas do not maintain their balance well in a moving vehicle and if not given room to cush will be very uncomfortable and at risk of injury.

Consider that the guideline relating to alpaca transport vehicles having enclosed fronts should be set as a standard. The wind chill factor associated with transporting alpacas in an open-fronted vehicle can have a dramatic negative impact on their welfare, especially for journeys of 3 or more hours, and it should not be considered an acceptable practice, regardless of the alpaca's age or time since shearing. It does not take much effort to tie a tarp over the front of an open stock crate so as to satisfy this standard if required.

Notes to the Standards:

SB1.2 iv) and SB1.3 require alpacas to be offered spells after the designated time off water or journey time. The note to the standard suggests that alpacas should not be unloaded for spells. I do not consider that it is acceptable to leave alpacas in a stationary vehicle for periods of 12 hours or more to meet the mandatory spelling periods, even with provision of water, feed and space to lie down as defined under 'spell'.

If alpacas are to be left on vehicles, their welfare would be better served by enabling longer journey times with shorter spell periods of say 4 hours for watering and toileting etc so that they arrive at their final destination sooner and then can be offloaded from the transport vehicle.

Guidelines:**Fitness:**

GB1.1 ii) what might be considered adverse weather conditions for alpacas should be defined eg hot with high humidity; wet and windy; etc

v) this statement is so general that it offers no real guidance as to additional considerations. It should either be deleted or further defined as to what may be covered; for example, does it mean to cover other possible stressful events, such as recently shearing, or simply likely earlier grazing/feeding opportunities.

GB1.2 One important issue in evaluating longer term fitness for travel is whether the alpaca is ruminating and toileting regularly as these are important indicators of healthy gut function. Lack of urine and pellets should be as much a concern as diarrhea.

GB1.3 It is highly unlikely that a cria less than 7 days will be transported on its own, unless it is an orphan or requiring veterinary attention. In the latter case it may be preferable to get it to the vet quickly rather than attempting to offer feed en-route and in the former case, it is likely to be on a 3-4 hourly bottle feed interval so should not require other feed and water during the journey.

GB1.4 The requirement that alpacas in their last trimester of pregnancy should be spelled for 12 hours before starting another journey seems highly counter-productive to their welfare, particularly if they are to be kept on the transport vehicle for the spell period, as suggested in the Notes to the Standards. Most heavily pregnant alpacas are only transported for veterinary treatment and standard SB1.4 only allows their transport under veterinary advice, unless it is a trip of less than 4 hours. If an alpaca has been transported to a vet for treatment, this guideline effectively recommends that it remain at the vet's for 12 hours before being transported home. I doubt that this was the intention behind the guideline.

Food and water

GB1.5 The standards, notes to the standards, and above guideline both require and recommend spells. It is therefore counter productive for this guideline to recommend that spells be avoided. Has there been an error here and the guideline should actually read that spells involving the unloading of alpaca should be avoided? While I understand concerns with maintaining the biosecurity of alpacas and possible injury during loading and unloading, I do not agree that alpacas should be left on transport vehicles for extended spell periods of 12 hours or more. From my experience the opportunity to walk around provided by a spell off vehicle provides a higher level of overall welfare.

Loading Density

GB1.10 Consider that these offer sound guidelines for loading densities.

GB1.13 Should consider including comment that alpacas travelling with cria should be provided with more space than suggested for the same size alpacas travelling separately as cria need room to be able to seek access to their dam to suckle.

Vehicles and facilities

As noted above, consider that GB1.14 should be a standard not simply a guideline.

GB1.17 Guideline should note that pen dividers need to be designed to allow for alpacas to cush without catching legs through rails while sitting down or rising.

Handling

GB1.18 Consider that this guideline should allow for properly fitting halters to be left on alpacas being transported for veterinary attention as it is likely to be less stressful for the alpaca to have a headstall/halter fitted at home during loading than attempting to do so upon arrival at the veterinary practice. However, all leads should be removed from the halters during transit.

Consider that there should be an additional guideline allowing the manual lifting of cria up to 6 months into transport vehicles, as well as the manual lifting of alpacas being transported for veterinary attention.

Humane destruction

While the need to destroy an alpaca during transit is an unwelcome thought, consider that the guideline should provide for the preferred method of humane destruction to be lethal injection and where that is not available than the use of a firearm will be recommended.