



For all creatures great and small.

Animal Welfare Standards Public Consultation
PO Box 196
DICKSON ACT 2602

26 May 2008

Dear Sir, Madam

**Australian Standards & Guidelines for the Welfare of Animals: Land
Transport of Livestock – public consultation process**

Thank you for the opportunity to comment on the above Standards & Guidelines and its accompanying Regulation Impact Statement (RIS).

Please find attached RSPCA Australia's submission which is divided by issue and for each clearly states the RSPCA's position. The Attachment to the submission is a detailed list of further comments on specific issues in the Standards & Guidelines for consideration.

I would also like to reiterate our concern with the drafting and consultation process. Given its membership, Animal Health Australia cannot be considered an independent body in this process. Hence, we continue to believe that a Standards Writing Group made up of representatives from a range of stakeholder groups is essential to ensure complete fairness, balance and transparency in the drafting and consultation process.

Please don't hesitate to contact us should you require further information.

Yours sincerely

A handwritten signature in cursive script that reads 'Heather Neil'.

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**RSPCA Australia submission
To the Animal Welfare Standards Public Consultation
on the
Australian Standards & Guidelines for the Welfare of Animals:
Land Transport of Livestock
May 2008**

This submission addresses the question put in the public consultation process does “the Draft Land Transport Standards make the necessary specifications for protecting the welfare of livestock while being transported on land” and whether “the associated Regulatory Impact Assessment (RIS) demonstrates the need for the Standards and identifies its key costs and benefits for industry, government, and the wider community”.

General comments

The lack of prescriptiveness of some Standards means that the intended outcome and the method of achieving that outcome are open to interpretation. Lack of prescriptiveness inevitably leads to lack of enforceability and RSPCA Australia seeks assurance that non-prescriptive Standards will be strengthened where this lack of enforceability could lead to poor animal welfare.

RSPCA Australia believes that greater improvement to the welfare of livestock transported across Australia could be achieved by adopting the more prescriptive and higher welfare guidelines into the Standards rather than reflecting current industry practice without significantly raising the bar.

Responsibilities for livestock transport

Communication of time off water throughout the transport process

The draft Standards & Guidelines state that, for journeys expected to exceed 24 hours, the animals must be accompanied by a document that states the date and time that the animals last had access to water (SA1.2i on page 7). The draft Guidelines provide further guidance to owners, drivers and receivers on their communication responsibilities during the transport process. RSPCA Australia is concerned that this Standard does not provide adequate protection to animals travelling on multi-stage journeys in which each journey is less than 24 hours. It is a particular concern that not all saleyards or other holding yards provide animals with access to water.

RSPCA Australia

- requests that the Standards provide assurance that all people in the transport process are aware – or made aware – of the time that animals have been without water, regardless of the time to be travelled, and take appropriate measures to ensure that the maximum time allowed off water is not exceeded.
- requests that a scientific/welfare basis be provided for the minimum voluntary spelling time of 4 hours which allows for deductions in water deprivation calculations.



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Transport vehicles and facilities for livestock

The amount of space provided to animals being transported – height

The draft Standards & Guidelines specify that the vehicle must have sufficient vertical clearance for livestock to minimise the risk of injury (SA3.1v on page 15). RSPCA Australia is concerned that this Standard does not provide adequate assurance that animals will be able to stand in a natural position without contacting overhead structures.

RSPCA Australia

- wants to see the vertical clearance clause strengthened so that, if an animal has to stand with its head down, then at least its back or withers do not come into contact with overhead structures when the animal has its legs directly under its body as opposed to slightly splayed when maintaining balance. RSPCA Australia believes that vertical clearance should be such that an animal is able to stand comfortably with its head up.

Pre-transport preparation of livestock

Rest (or spell) prior to transport

Feed, water and rest considerations are outlined in the Guidelines on page 18. RSPCA Australia is concerned that the draft Standards & Guidelines do not adequately address the need for rest of certain categories of animals that are at an increased risk, particularly when being transported over long distances.

RSPCA Australia

- wants the Standards to ensure that a pre-transport spell period (i.e. water and rest) is provided to the following categories of animals: livestock that are pregnant, have recently given birth, are lactating or with young at foot; immature livestock as defined for each species; livestock mustered from extensive areas or that are unaccustomed to handling; livestock that are stressed or fatigued from mustering or handling; and weak livestock. In addition, RSPCA Australia wants the Standards to ensure that such animals only be transported where it is in their direct interest to do so.

Loading, transport and unloading of livestock

The amount of space provided to animals being transported – loading density

RSPCA Australia is pleased to see the inclusion of factors that need to be taken into consideration when determining loading density (SA5.3) as well as the naming of the driver of the vehicle as the person who has final responsibility for loading density (SA5.4). However, RSPCA Australia believes that these two Standards do not go far enough to ensure that pens or crates are not overloaded, particularly in those circumstance where squeezing an extra animal or two on a truck is in the consignor's interest but may cause unnecessary suffering or distress to the animals concerned.



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RSPCA Australia

- wants to see the loading density tables currently included in the species-specific Guidelines (for example, GB4.10 on page 51) to be included in the relevant species' Standards to provide additional criteria on which to base final loading density.

Animal handling – lifting and dragging

The draft Standards & Guidelines state that animals (excluding poultry) must not be lifted off the ground by a single leg with the exception of sheep, goats and pigs under three months old (SA5.6ii on page 22). RSPCA Australia finds lifting and/or dragging an animal by a single leg unacceptable, regardless of age.

RSPCA Australia

- requests that this Standard include dragging of animals by one leg and that the exception for sheep, goats and pigs under three months old be removed.

Animal handling – use of electric prodders

The draft Standards & Guidelines allow the use of electric prodders on a number of species. RSPCA Australia is concerned that habitual use of electric prodders may contribute to the stress of the overall transport process.

RSPCA Australia

- asks that the Standards prohibit the use of electric prodders in favour of alternative handling aids such as flappers, rattlers, or canes with flags and using other low-stress stock-handling techniques.

Humane destruction of livestock

Although the draft Standards & Guidelines state that the method of humane destruction must result in immediate loss of consciousness followed by death (SA6.1 on page 29), it is less specific on the timing ('at the first opportunity' – SA6.2iv) and location of humane destruction. RSPCA is concerned that unnecessary delays or inappropriate handling (for example, unloading of a moribund animal) will result in further suffering and distress.

RSPCA Australia

- requests that the Standards prescribe that humane destruction be carried out immediately or, if not, at the first opportunity and in the interest of the animal concerned. All efforts must be made to avoid unnecessary handling of moribund animals that are unable to walk.

Specific requirements in relation to all species

The total time that animals are allowed to be off water

The draft Standards & Guidelines propose a maximum time off water for each species. This maximum time has, where available, been derived from the extended water deprivation time in the relevant species' Model Code of Practice for the Welfare of Animals. However, in these Codes, the extended time (as opposed to the 'normal time') was clearly meant to be an exception



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rather than the rule, with extended time only permissible if certain conditions guaranteeing the continued welfare of the animals could be met.

RSPCA Australia is concerned that the draft Standards & Guidelines allow extended time off water without sufficient consideration that additional travel beyond the 'normal time' will cause additional stress on the animals and therefore requires additional care.

RSPCA Australia

- requests that time off water is reflected in the species-specific Standards as the 'normal time' with exceptions only permitted following additional considerations for longer travel (as spelt out, for example, in Guideline SG4.1 on page 50).

Specific requirements in relation to cattle

Transport of bobby calves

RSPCA Australia is concerned that the draft Standards & Guidelines allow bobby calves to be transported at an age (5 days old) and at journey times (18 hours) that show little consideration of the ability of these very young animals to withstand the rigours of transport. The draft Standards & Guidelines provide for improved transport conditions (bedding and shorter transport times) for higher-value calves sold to rearing facilities and offer little protection for low-value calves sent to slaughter (see SB4.4 and SB4.5 on page 49).

RSPCA Australia

- requests that the minimum age at which bobby calves may be transported be increased to 10 days and that they are provided with milk or milk-replacer at 12-hour intervals. For bobby calves destined for slaughter, RSPCA Australia requests that the time interval from farm to abattoir not exceed 10 hours and that all bobby calves, regardless of destination, are transported in vehicles that provide them with thick bedding and room to lie down.

Australian standards and guidelines for the welfare of animals: Land transport of livestock – Regulation Impact Statement

While RSPCA Australia fully supports the introduction of Standards as a means of improving animal welfare, we believe consistent implementation and regulation through state/territory legislation is critical to ensure that compliance with the Standards will be able to be audited thus providing an opportunity for improved animal transport.

RSPCA Australia

- requests that the Federal Minister for Agriculture ensures that his state/territory equivalents push for the draft Standards to be incorporated into nationally consistent legislation within two years of being approved by the Primary Industries Ministerial Council. This will ensure that all those involved in the transport process are encouraged to adhere to the minimum requirements set out in the Standards.



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In looking at alternatives to the proposed Standards, the RIS has assessed various options, including Standards that create a higher level of welfare for the animals concerned (see options B1, E and E1 on page 48 of the RIS). Option B1 looks at the effect of increasing the minimum age at which bobby calves can be transported from 5 to 8 days old. Options E and E1 look at the effect of increasing minimum spelling time from 4 hours to 6 and 12 hours respectively.

The RIS, in its consideration of the benefits of these options, fails to properly consider anecdotal as well as the available scientific evidence in favour of such a change. Rather, it focuses heavily on opinion rather than fact (e.g. on page 57, “Moreover, the higher mandatory time for voluntary spells under Option E1 in order to get time-off-water credits (as compared to Option E) is likely to further reduce the risk to the welfare of livestock.”) and, in the case of Option B1, fails to consider the available scientific research conducted in Europe which shows that older calves are more likely to withstand the rigours of transport than younger calves.

The RIS shows no difference in the weighting of the animal welfare benefits of transporting calves at 5 days old or 8 days old. In addition, there is no clarification as to the basis for determining an age of 8 days old as a means of improving calf welfare during transport. What consideration was given to, for example, 10 days old?

The RIS also fails to point out that the draft Standards & Guidelines allow bobby calves to be off water (or liquid feed) for 18 hours, whereas the Model Code of Practice for the transport of cattle states that calves must not be left without appropriate liquid feed for more than 10 hours. In other words, their journey times have been extended – to the benefit of the transporter but, to the detriment of the welfare of the calf.

RSPCA Australia questions whether the RIS has taken the animal welfare benefits and community expectations of Options B1, E and E1 into account sufficiently by the use of weighting in the final analysis, particularly given the difficulty in quantifying such benefits/expectations.



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ATTACHMENT A

Summary of RSPCA Australia's comments on the draft *Australian standards and guidelines for the welfare of animals: Land transport of livestock*

Public Consultation Version – 29 February 2008

Page no./ Standard	Current wording	RSPCA Australia comment
v		PISC (Primary Industries Standing Committee) needs to be included
vii		Suggest removing footnote with website address here and elsewhere in the document. Website URLs change and it is not helpful to have links that don't work.
SA1.2	... one or more documents that accompany the livestock...	Such a document should preferably be an existing document that, if need be, is adjusted so that the required information can be completed. E.g. a slightly revised NVD.
SA3.1	Vehicles and facilities must:... etc	Even though the Objective specifies the type of vehicles and facilities, the standard itself does not. Propose alternative wording, e.g.: <i>"Transport vehicles and holding, loading and unloading facilities must be..."</i>
SA3.1	i) be appropriate to contain the species	Add <i>"...and to prevent limbs and/or other body parts from protruding"</i> .
SA3.1	ii) have effective ventilation	Is it understood that this includes effective ventilation when the vehicle is stationary? Propose revised wording: <i>"ii) have effective ventilation (when moving and stationary)"</i>
SA3.1	v) have sufficient vertical clearance for livestock to minimise the risk of injury	This needs to be expanded, e.g. as per ASEL appendix 2.3: <i>"have sufficient vertical clearance for livestock to avoid risk of injury and be able to stand in a normal position without contacting overhead structures"</i> It is not satisfactory to have this as a guideline (GA3.5) only.
GA3.0	n/a	This set of guidelines would benefit from inclusion of a general statement about why animals need to be protected and from what. Then the more detailed guidelines following make more sense. E.g. <i>"GA3.0 Facilities, vehicles, crates and containers should provide a suitable environment to protect animals from extremes of temperature, weather and humidity. The environment should be constructed, maintained and operated in a way that avoids pain, injury or distress to the animal."</i>

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Page no./ Standard	Current wording	RSPCA Australia comment
	Vehicle exhaust gases should not significantly pollute the livestock crate.	“Significantly” is open to interpretation. Add more detail, e.g. “... crate, <i>so as to avoid respiratory distress.</i> ”
?? (previously GA4.8)	Pretransport spell (water and rest) periods should be provided for the following classes of livestock, excluding poultry, where there is long and difficult mustering or if the travel time is expected to be of a long duration: i) livestock that are pregnant, have recently given birth, are lactating or with young at foot ii) immature livestock as defined for each species iii) livestock mustered from extensive areas or that are unaccustomed to handling iv) livestock that are stressed or fatigued from mustering or handling v) weak livestock	There is general agreement that these classes of livestock pose an increased risk to animal welfare. RSPCA believes these classes of livestock should not be transported at all. The guideline GA4.8 must not be removed. Furthermore, it must be included in the Standard with some additional wording, e.g.: “ <i>Where it is in the interest of their welfare to transport the following classes of livestock:</i> - etc a pretransport spell (water and... etc.”
SA5.1	If the maximum permitted time off water is reached, livestock must be provided with water, food and rest before starting another journey.	Reduce risk of misinterpretation by adding “... <i>journey or continuing the current journey.</i> ”
SA5.3	Loading density must be determined according to ... etc.	Include “ <i>viii) design and capacity of the vehicle</i> ”
SA5.4	Drivers (except for train drivers and drivers of poultry) must have the final decision on the loading density. Poultry pick-up crews loading poultry into containers must have the final decision on the loading density.	So who has the final decision in the case of rail transport of livestock if it is not the train driver? Need to specify as has been done for poultry.
SA5.6	i) livestock (excluding poultry) must not...	There should be no exclusion for poultry. They should also be supported when carried.

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Page no./ Standard	Current wording	RSPCA Australia comment
SA5.6	ii) livestock must not be lifted off the ground by a single leg except in the case of all poultry, and sheep, goats and pigs if they are less than three months old	Expand this clause to include dragging, e.g.: “ii) livestock must not be <i>dragged or</i> lifted off the ground by a single leg... Remove the exclusion for sheep, goats and pigs under three months old, this is just as unacceptable regardless of age.
SA5.7	Electric prodders	RSPCA Australia is opposed to the use of electric prodders for moving livestock. If this Standard is to remain, then include specification, e.g. “battery or dynamo-powered electric prodder”.
SA5.10	The driver must inspect: i) the livestock crate immediately before departure, to ensure that doors are closed	Revise wording to reflect the original intention of this standard: “ <i>ii) the livestock crate before departure, to ensure that the load is secure, and that animals cannot escape and are suitably contained, without limbs protruding</i> ”
SA5.9	ii) the receival yard immediately before unloading, to ensure that there is free access and sufficient space for the livestock intended to be unloaded	An important aspect of this inspection is missing – access to water. Revise wording to include: “ <i>and ensure that unloaded livestock have access to water.</i> ”
GA5.13	Transport arrangements (including spells) should be appropriate for the class and condition of the livestock. In all circumstances, transport of the following classes of livestock should be carefully managed to minimise risk to animal welfare: etc.	Transport of these classes of livestock should only occur if absolutely necessary. Add a phrase to that effect.
GA5.41	Before unloading, the driver should check the condition of the receival area... etc.	If the receival area is not considered appropriate for unloading, the driver should refer to the contingency plan for alternative arrangements. Include wording to this effect.
SA6.6	Captive bolt use must be in the frontal or poll positions, be accompanied by appropriate restraint, and be followed by an effective procedure to ensure death.	Include text as per note below the standards: “ <i>Points of aim for firearms and captive bolts are shown in a diagram for each species, as relevant.</i> ” What is “an effective procedure” that will ensure death?

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Page no./ Standard	Current wording	RSPCA Australia comment
SA6.7	“... or piglets up to 15 kilograms liveweight...”	Is 15 kilograms based on industry advice? Recommend removing reference to piglets and allow blunt trauma on newborn livestock under 24 hours old only, regardless of weight and regardless of species.
SA6.8	Animals must be assessed to be unconscious before pithing.	What are the assessment criteria for unconsciousness? They should be included here.
SB1	Specific requirements for the land transport of alpacas	This chapter should cover other new world camelids (e.g. llamas) but need to ensure that standards and guidelines are equally applicable to any other species included here.
SB1.2	Journey time may be extended to 72 hours for all alpacas only under the following conditions:	Is 72 hours based on industry advice? Consistent with other species chapters, it would seem that the extension should only apply to wethers over 12 months old – i.e. the fittest animals, regardless of water availability on the truck.
SB1.2	i) alpacas must be watered and fed on the vehicle at all times	For this and other chapters where this clause appears: Do animals drink and/or eat on a moving vehicle? This clause should include a statement on frequency of feeding/watering during the extended journey time.
SB1.2	iii) alpacas must be assessed regularly to see whether they are fit for the remainder of the intended journey	Suggest alternative wording for this and other chapters where this clause appears: “iii) alpacas must be assessed <i>as per SA5.11</i> to see whether they are fit for the remainder of the intended journey”. This is to avoid disagreement over the term “regularly”.
GB1.1 (v)	the recent management of the alpaca before first loading.	For this and other species where this additional consideration for long distance travel is mentioned, it would help to add an example of ‘recent management’, e.g. extensive mustering, etc.
GB1.10	Text under the density table: Where alpacas are penned on the vehicle, there should be space for most to lie down (they may not all lie at once), move or turn around, and access feed and water facilities.	This text should be converted to a guideline. Also, if the expectation is that animals will lie down during transport, the density tables should reflect space required in this position rather than in a standing position – applies to other species that have similar requirements during transport.

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Page no./ Standard	Current wording	RSPCA Australia comment
GB1.12	For longer journeys, space to access feed and water should be provided, as well as bedding (straw or other suitable material) for comfort.	Water must be provided for journeys extended up to [72] hours so, this guideline is confusing. I.e. the requirement for space to access water is a MUST on longer journeys. Define “longer”...
GB1.17	Vehicles should contain pens or partitions and feed or water facilities for longer journeys. Penning arrangements should allow alpacas to turn around and to cush during the journey.	Again, MUST contain water facilities on longer journeys.
SB2.4	Electric prodders	Electric prodders must not be used to move buffalo. See GB2.15.
SB3.6	Electric prodders	Electric prodders must not be used to move camels.
SB4.1	Calves 5-30 days old travelling without mothers – 18 hrs time off water	The 2002 cattle transport MCOP says 10 hours for calves travelling without mothers. MCOP 2002 says calves under 1 month should be fed a liquid feed every 10 hours.
SB4.4	Calves less than 5 days old travelling ... etc.	It is the RSPCA’s view that calves should be at least 10 days old prior to transportation and that they be fed milk or milk replacer every 12 hours. If the RIS (option B1) has looked at increasing calf age to 8 rather than 5 days, then this option should also be included as an option in the Standards. In other words, SB4.4 (option 1) “Calves less than 5 days...” and SB4.4 (option 2) “Calves less than 8 days...”. Not presenting it as an option in the Standards would be negating the fact that several members of the SRG believe it would be a considerable welfare improvement as well as having other (commercial) benefits.
SB4.5	Calves between 5 and 30 days old travelling without ... etc.	It is the RSPCA’s view that calves should be at least 10 days old prior to transportation, that they be fed milk or milk replacer every 12 hours and that the interval from farm to abattoir/destination not exceed 10 hours.
GB4.4	...for journeys approaching 24 hours.	The standard does not allow time off water beyond 18 hours. A 24-hour journey would therefore not be permitted.

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Page no./ Standard	Current wording	RSPCA Australia comment
GB4.6	Cows in the seventh and eighth month of pregnancy ... should be spelled for 12 hours before reloading.	Need to qualify this statement, e.g. <i>“If it is necessary to transport cows in the seventh and eighth month... etc”</i>
GB4.7	<ul style="list-style-type: none"> cattle should be segregated from other classes of cattle 	Add ‘pregnant’, i.e. <i>“pregnant cattle should be segregated...”</i>
GB4.11	Calves under one month old should have sufficient space to lie down on their sternum.	This should be a standard.
GB4.12	Calves less than 30 days old should have: <ul style="list-style-type: none"> protection from excess heat, sun, wind and rain in a vehicle with an enclosed front and that provides effective ventilation. 	This should be a standard.
SB5.1	Deer over 6 months old – 48 hours time off water Fawns/calves under 6 months old – 28 hours off water	What is the 48 hrs based on, particularly when the various codes specify 24? Maximum time off water should be 24 hours with no extension. What is the 28 hours based on? Maximum time off water should be 20 hours with no extension.
SB5.4	Prodders	Prodders must not be used on deer.
GB5.3	Deer with antlers in velvet greater than 4 cm should not be transported. Deer should not be transported for 7 days after velvet antler removal.	This should be a standard.
GB5.4	Deer with hard antlers greater than 4 cm should not be transported. Where hard antler removal cannot be done, they must be separated from all other deer.	This should be a standard.
GB5.9	Deer are particularly susceptible to heat stress. A supply of suitable water should be provided before loading.	This should be a standard.
GB5.17	Electric prodders should not be used on fawns or calves.	Electric prodders should not be used at all.
SB6.2	Chicks and young birds must be fed every 12 hours.	Is the assumption here that they will be spelled every 12 hours? How long is a spell for chicks and young birds after 12 hours off water?

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Page no./ Standard	Current wording	RSPCA Australia comment
SB6.3	Ratite chicks must not be held in containers for more than 12 hours, unless provided with feed, water, and shelter.	How practical is it to provide birds in containers with feed, water and shelter?
GB6.9	Chicks up to 12 weeks old should be transported in groups of no more than 20 birds with partitions placed between adjacent groups.	This should be a standard.
GB6.10	Juvenile and Adult birds should be transported in groups of no more than 12 birds with partitions placed between adjacent groups.	This should be a standard.
GB6.11	Text under table: Space allowance for ostriches remain to be developed.	Are these going to be developed and by whom?
Note under GB6.24	Time spent in containers for chicks should be calculated from the time of placement into the container, not the time transport begins.	This should be a standard.
GB6.30	A shot gun is the preferred firearm for humane destruction... etc. Note under guideline: Ratites can be shot by firearm using the temporal method... etc.	RSPCA finds the use of shotgun for killing animals/birds unacceptable. In what circumstances would close restraint not be possible? Aren't we talking about humane destruction on or near the transport vehicle in the event of an injury or disease? [SA 'code of practice for humane destruction of birds by shooting' says "head shot with shotgun for injured birds only" at optimum range of 5m] SA code of practice and other publications on shooting of birds say heart shot only with centrefire rifle.
GB7.1	Loading density table	Is it correct that minimum floor area for goats is less than that for sheep?
GB7.11	Under cold conditions in southern Australia, time off water should only be extended under the following conditions:	It is not acceptable to extend time off water beyond maximum times specified in the standard.

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Page no./ Standard	Current wording	RSPCA Australia comment
SB8.1	Lactating mares – 12 hours off water Pregnant mares – [12] hours off water	Both these figures used to be 8 hours. See GB8.3 mentioning increased risk for these classes.
SB8.2	Journey time may be extended to 36 hours... etc	Surely this is only for horses over 6 months old regardless of whether they are fed and watered on the vehicle?
SB8.7	Moderate to severely lame horses of lameness score 4 and 5 (as specified in Table B8.2) must not be transported unless veterinary advice is obtained.	The lameness score was 3 in previous versions of the document. What is the change based on? Also, Table B8.2 needs to be included in this standard – unless advice has been obtained that standards can refer to sections in the guidelines?
SB8.10	A vertical clearance of 2 m between the livestock crate floor and overhead structures must be provided in any vehicle used for horse transport.	Add “at least” before 2 m.
SB8.11	Unbroken stallions must be segregated from other horse categories.	Unbroken horses should be separated from broken horses, regardless of whether they are stallions. In addition, the intent here is differentiating between horses that are accustomed to handling rather and those that are not.
GB8.1	ii) adverse hot weather conditions are not prevailing or predicted	Remove “hot”. What about ice/snow that could affect vehicle road worthiness, etc?
SB9.2	Journey time may be extended to 48 hours only under the following conditions:	Is this based on industry advice? Seems excessive.
SB9.5	Approved methods for humane destruction	See SA6.7.
GB9.2	... Transport of sows should be over short distances... etc	Define “short”.
GB9.16	The chest stick should be used as the preferred method of bleeding out.	Need to mention stunning prior to sticking.
SB10.3	Poultry, excluding chicks, must not be held in containers for more than 24 hours, unless provided with feed, water and shelter.	Are poultry ever provided with feed and water while still in their containers?

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Page no./ Standard	Current wording	RSPCA Australia comment
GB10.11	Note under density table: ... and in cold weather this density may be increased to 472 chicks/m ² (21 cm ² per chick)	The chicks are already packed together. The suggestion here is that you can pack more in just because it's cold... Remove reference to increasing density during cold weather.
GB10.29	Conveyors should not be on steep angles or operated at speeds that cause birds to smother.	Define steep.

Glossary

Term	Current wording	RSPCA Australia comment
Access to water	A reasonable opportunity for livestock to be able to drink water of a suitable quality and quantity to maintain their hydration.	Delete "reasonable".
Competency	iii) recognised training and staff training registers	Include "accreditation", e.g. "recognised <i>or accredited</i> training..."
Document	A document for livestock movements is any written record... etc	Revise definition, e.g. "A document for livestock movements is any written <i>or electronic</i> record... etc"
Fit or fit for the intended journey	<ul style="list-style-type: none"> not be visibly dehydrated 	Explain "visibly dehydrated".
Fit or fit for the intended journey	<ul style="list-style-type: none"> not visually assessed to be within 2 weeks of parturition 	Explain what one is likely to see when an animal is within 2 weeks of parturition.
Heat stress		The term is used in the document and therefore needs to be defined.

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Term	Current wording	RSPCA Australia comment
Journey	The movement of livestock from loading to unloading at a destination.	<p>This does not necessarily cover multi-stage journeys where animals have been unloaded due to maximum water deprivation time having been reached. Suggest alternative wording, e.g. “The movement of livestock from loading to unloading at a destination <i>or at the point where maximum time off water has been reached</i>”.</p> <p>In addition, some explanation of the term “longer journey” as used throughout the document would help in interpretation, e.g. “Where the term ‘longer journey’ is used, this refers to journeys in excess of water deprivation times as specified in the species guidelines where mention is made of additional requirements for long distance travel.”</p>
Journey time	The time that animals are in a container or on a vehicle, until they are unloaded.	See “Journey”
Nature of journey	Includes duration, distance, route, road conditions, terrain, traffic and any other factors that could affect a journey for livestock.	Include “prevailing weather”.
Person in charge		Revise term, e.g. “Person in charge / <i>person responsible</i> ” as per objective of chapter 1.
Spelling, spell or spelling period - voluntary	<p>Water and space to lie down must be provided to all livestock, on a stationary vehicle or off a vehicle.... Etc</p> <p>A spell must be a minimum of 4 hours to be recognised for the provision of water and rest.</p> <p>Where livestock are spelled for 24 hours, any subsequent journey can be considered as a new water deprivation period.</p>	<p>It is RSPCA’s view that, in those situations where livestock welfare would not be adversely affected, all livestock should be unloaded during a spell.</p> <p>What is the (scientific) basis of the minimum 4 hour spell?</p> <p>This does not make sense in the context of, for example, 36 hours mandatory spell after 48 hours off water for cattle/sheep. It could be interpreted as 24 hours spell being sufficient after 48 hours off water.</p>



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Term	Current wording	RSPCA Australia comment
Standards	The acceptable animal welfare requirements designated in this document. The requirements that must be met under law for livestock welfare purposes.	Revise “The acceptable animal welfare requirements designated <i>in the standards sections</i> in this document.”
Weak	Livestock that are sufficiently affected so they do not meet the ‘normal’ criteria for the journey but are able to be managed for successful transport.	Revise “Livestock that are sufficiently affected so they do not meet the ‘normal’ criteria (<i>as per SA4.1</i>) for the journey but are able to be managed for successful transport <i>without further compromising the welfare of the animal(s) concerned.</i> ”
Welfare of livestock	Any component of the livestock welfare state that is recognised as being important for the species in question in an everyday sense. The normal expectations of welfare that would apply to a livestock species in a normal situation.	Expand definition to include: “ <i>Includes access to water, food, shelter; the ability to express normal behaviours; and the provision of care to prevent pain, injury or disease.</i> ” The definition as it stands is too vague, particularly with the use of such terms as ‘normal expectations’ and ‘normal situation’ – it is also unclear as to who needs to ‘recognise’ that these components are important and to what extent.