

Land Transport of Livestock Standards and Guidelines

Comments from DPI Victoria

May 2008

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DPI Victoria would like to acknowledge the enormous amount of work that has gone into the production of the Land Transport of Livestock Standards and Guidelines by Animal Health Australia and by all stakeholders.

Victorian DPI comments on the Standards and Guidelines are detailed in the table within this document however we would like to comment on the Regulatory Impact Statement and some of the unresolved issues in a more narrative fashion.

Regulatory Impact Statement

DPI Victoria supports Option B

DPI Victoria supports the use of the scientific approach to the development of Standards wherever possible but notes that the much work still needs to be done and so the use of informed common sense is and an awareness of community expectations are also important considerations.

Demonstrating that proposed standards are consistent with relevant international standards (eg New Zealand's Code of Recommendations and Minimum Standards for the Welfare of Bobby Calves) is another stated aim of the RIS. Demonstration of consistency with well documented and communicated industry initiatives (eg Dairy Australia's "Fit for Sale" guidelines for bobby calves) should also be sought.

The difficulties of defining a base case from which to measure the economic impact of implementing the standards are well understood. It could be argued that the fact that compliance with the Model Codes of Practice is far from perfect at present means that the costs to industry to meet the standards may be higher than assessed. This however would be offset by the benefits to animal welfare and the associated reduction in risks to industry and Australia's reputation.

Unresolved Issues

Time off water

DPI Victoria is concerned that time off water is applied to unweaned animals, in particular bobby calves, and believe that time off liquid feed is more relevant in these cases.

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Transport of bobby calves

A number of factors need to be considered when dealing with bobby calves. Bobby calves are neurophysiologically immature neonates with no fat reserves and poorly developed thermoregulatory mechanisms. They have reduced responses to external stimuli and are less able to withstand the stresses of climatic extremes. Bobby calves are reluctant to lie down on cold hard surfaces but are incapable of standing for long periods of time. The natural instinct of a bobby calf (like many neonates) is to lie down and hide rather than exhibit herding behaviour like adults.

Because of these factors, extra consideration needs to be given to the manner in which bobby calves are handled. Their behavioural responses lead to inappropriate handling often resulting in frustration of handlers and unacceptable practices such as the use of goads or dogs. The nature of bobby calves physiology means that clean, warm and dry conditions are vitally important to maintaining their welfare. Loading densities, time in transit and vehicle standards play major roles in the ability of calve to stay clean, warm and dry. It can be argued that the time in transit may well be the major issue affecting bobby calf welfare post farm gate. Death in bobby calves increases exponentially with distance of transportation (Mortalities with long distance transport. Cave, Callinan and Woonton AVJ vol 83 nos 1&2).

For these reasons, DPI Victoria would like to see a requirement for calves to be fed within 6 hours of transport, a return of the time and distance requirements in GB4.3 to the standards and some guidelines converted to standards (as detailed in the table below)

Specification for loading density of livestock

The development of additional guidelines for common situations and the incorporation of scientifically validated data into the standards should be considered.

Appropriate interpretation of the standards and guidelines

DPI Victoria is of the view that the primary aim of the standards is to improve animal welfare. This aim may be best achieved using the proposed mix of prescriptive and non-prescriptive standards and added guidelines. The ability to prosecute those standards although important should not preclude them. Similarly, duplication of coverage by both general and species standards should not be entirely avoided, particularly with significant issues.

Humane destruction issues

DPI Victoria strongly supports the inclusion of standards and guidelines for humane destruction including the need for competency of those responsible for livestock during transport.

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Competency for operating vehicles

This should only be referenced where it relates to impacts on animal welfare.

Definitions of welfare risks

Pain and suffering should be adequately covered by other “cruelty” legislation.

Definitions of positions of stance

It is important that the provisions where there is acknowledged risk to welfare should be supported by adequate guidelines.

Additional issues associated with time-off water

Provision of water in saleyards and transit yards should be mandated.

Issues associated with the handling of livestock.

These issues are addressed in the table below.

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No.	STANDARD	COMMENTS
1	Responsibilities and Planning	
SA1.2	<p>For a journey reasonably expected to exceed 24 hours, there must be one or more documents that accompany the livestock and that specify:</p> <ul style="list-style-type: none"> i) the date and time that the livestock last had access to water ii) the date and time of livestock inspections and any livestock welfare concerns and actions taken iii) emergency contacts. <p>A person in charge who is transferring responsibility for livestock to be further transported for longer than 24 hours must provide a document with this information to the next person in charge.</p>	<ul style="list-style-type: none"> i) amend to read " the date and time that the livestock last had access to water and food or liquid feed in the case of unweaned stock travelling without their mothers <p>We accept that travel times are based on water deprivation but total time of food can also be imported for some species and types i.e. young stock or pregnant stock. So should above also detail last access to food?</p>
GA 1.2	<p>The livestock consignor is responsible for the livestock until they are loaded onto the transport vehicle. This responsibility includes but is not restricted to:</p> <ul style="list-style-type: none"> i) selecting livestock to make sure that they are fit for the intended journey ii) providing feed, water and rest before curfew or loading, as appropriate iii) providing suitable holding and loading facilities that 	<p>Add providing suitable shelter and protection for the elements for susceptible animals such as young stock</p>

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	<p>do not predispose livestock to injury</p> <ul style="list-style-type: none"> iv) handling livestock according to these standards and guidelines v) communicating feed, water provision times and other relevant information vi) completing required documentation accurately for each livestock consignment, including transferring the responsibility for livestock welfare vii) making sure that any livestock that are unsuitable for loading following preloading inspection at the assembly point are appropriately managed, treated or humanely destroyed. 	
<p>A 1.3</p>	<p>The transport company or driver is responsible for the livestock from the point of loading of livestock (including inspection and assessment of livestock immediately before loading), to the point of unloading and notifying the receiver of the livestock at the destination. This responsibility includes but is not restricted to:</p> <ul style="list-style-type: none"> i) being competent in their tasks and key activities to meet the provisions of these standards ii) taking action to determine the time that livestock were deprived of water from the previous owner or person responsible, including time without water during assembly, holding, loading or previous transport 	<ul style="list-style-type: none"> ii) add “or time without milk in the case of unweaned animals”

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	<p>iii) inspecting and assessing livestock at loading to ensure that they are fit for the intended journey</p> <p>iv) inspecting livestock during the journey as required and taking action if a problem arises that affects the welfare of the livestock</p> <p>v) making sure that the management, care or humane destruction of any livestock that are judged as weak, ill or injured during the journey</p> <p>vi) informing the livestock consignor and receiver of any problem encountered during the journey in relation to the welfare of the livestock, including where livestock may not have met the specified fitness requirements for loading</p> <p>vii)</p>	<p>v)...sentence is unfinished, should this say “is appropriate or minimises the welfare impact”?</p>
2	Stock Handling and Competency	
SA2.1	<p>A person involved in handling, selection, loading, transporting and unloading livestock must be competent to perform the required task, or must be supervised by a competent person.</p>	
GA2.2	<p>Supporting evidence of competency should include the following:</p> <ul style="list-style-type: none"> • records of on-the-job training • relevant records of experience • recognised training and staff training registers 	<p>It would be useful to underpin Truckcare training or a certificate competency to indicate the standard of knowledge required</p> <p>e.g. recognised training, for example Truckcare training,</p>

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	<ul style="list-style-type: none"> • induction training • supervisor sign-off for specific tasks. <p style="text-align: center;"><i>Note</i></p> <p>Further details relevant to elements of stock handling competency are covered in other chapters, including those in Part B.</p>	
3	Transport Vehicles and Facilities for Stock	
SA3.1	<p>Vehicles and facilities must be constructed, maintained and operated in a way that minimises risk to the welfare of livestock.</p> <p>Vehicles and facilities must:</p> <ul style="list-style-type: none"> i) be appropriate to contain the species ii) have effective ventilation iii) have flooring that minimises the risk of injury or of livestock slipping and falling iv) be free from internal protrusions and other objects that could cause injury. v) have sufficient vertical clearance for livestock to avoid risk of injury. 	<p>There needs to be mention of protection from heat and cold. E.g. pigs must be protected from heat by a shade mesh over the top deck of all transport vehicles, standards for transport vehicles, in the case of bobby calves, should provide protection for the elements eg enclosed fronts on vehicles and flooring that provides some thermal comfort, for example perforated rubber matting (GA3.11 should be a standard)</p> <p>v) what does “sufficient” mean, it should refer to being able to stand normally or without continue contact with ceiling above them. (see GA3.5)</p>
GA 3.4	Vehicle exhaust gases should not significantly pollute the crate	Delete ‘significantly’?

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<p>GA 3.6</p>	<p>Limbs of livestock should not protrude from the livestock crate. Limbs should be contained within the livestock crate using an appropriate crate design, sound side panelling and appropriate loading densities.</p>	<p>Should be a standard. There are significant welfare implications if limbs are protruding</p>
<p>GA3.9</p>	<p>Appropriate bedding should be provided for certain classes of livestock.</p>	<p>"Appropriate bedding or floor surfaces (e.g. perforated rubber matting for bobby calves) should be provided for certain classes of livestock</p> <p>Which classes? A list or examples such as the one above should be added.</p>
<p>GA3.11</p>	<p>For livestock that are susceptible to cold (such as young livestock and poultry), transport vehicles should have either fully enclosed fronts or the ability for the vehicle front, roof or canopy to be covered to prevent windchill and cold stress.</p>	<p>Should be a standard, not a guideline. Some comment about flooring should be added e.g. perforated rubber matting for bobby calves)</p>
<p>GA3.12</p>	<p>Solid yard extensions should be used to cover any gaps between the loading ramp and the floor of the vehicle through which an animal or part of an animal might protrude.</p>	<p>Should be a standard</p>

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4	Pre-transport Selection of Livestock	
SA4.1	<p>Livestock must be assessed as fit for the intended journey at every loading. An animal is fit for a journey if it is:</p> <ul style="list-style-type: none"> i) able to walk on its own by bearing weight on all legs ii) not visibly dehydrated iii) not showing visible signs of severe injury or distress iv) free from conditions that are likely to cause increased pain or distress during transport v) not blind in both eyes vi) not known to be, or visually assessed not to be, within 2 weeks of parturition, unless the water deprivation time and journey is less than 4 hours duration to another property. 	<p>Amend (iii) : "not showing visible signs of severe injury, distress or disease (eg scours)</p> <p>Amend iv) delete 'increased'. Should be free of conditions which will cause pain or suffering unless travelling under vet advice. Alternatively change increased to significant or something similar?</p>
GA 4.2	<p>For journeys involving changeovers, livestock should be inspected for their continued fitness for the intended journey at each driver or vehicle changeover point during the journey</p>	Should be a Standard
GA4.5	<p>Livestock with broken limbs should be humanely destroyed unless veterinary advice recommends alternative measures</p>	Should be a Standard (Should this also include 'at first opportunity' or similar?)

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5	Loading, Transport and Unloading of Livestock	
SA 5.4	<p>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.</p>	<p>If driver is held responsible as per SA 1.1 and most legislations then they must have right of input into loading capacity</p> <p>Are poultry pick up crews competent to decide? The decision needs to be made by a competent person.</p>
SA5.6	<p>Livestock must be handled in a manner that is appropriate to the species and does not cause pain or injury. Specifically:</p> <ul style="list-style-type: none"> i) livestock must not be lifted off the ground by only the head, ears, horns, neck, tail, wool or feathers, 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 iii) livestock must not be thrown or dropped iv) livestock must not be punched, kicked or struck by hard or sharp instruments including lengths of metal piping, sticks or belts. 	<p>Amend (ii) :</p> <p>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 and, in these cases, extra support must be given</p> <p>Providing an unqualified exception to this standard is considered to be problematic. An animal which is 3 months of age can still be a fairly heavy animal. Is this really appropriate as an accepted practice?</p>

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<p>SA5.7</p>	<p>Electric prodders must not be used :</p> <ul style="list-style-type: none"> i) on genital, anal or facial areas ii) on livestock under 3-months old iii) on livestock that are clearly unable to move away iv) excessively on any animal 	<p>Delete "clearly" as it adds no perceived benefit to this clause and will cause enforcement difficulties in attempting to prove what "clearly" means. Livestock can either move away or not.</p> <p>(iv) excessively (what is excessive?) - amend to repeatedly</p>
<p>SA5.8</p>	<p>Dogs must be under control at all times during loading, transporting and unloading livestock. Dogs must not be transported in the same pen as livestock. Dogs that habitually bite; deer, goats, pigs, poultry, sheep and ratites, must be muzzled</p>	<p>Add: Dogs must not be used on animals less than 30 days of age</p> <p>Include "horses" in above statement as the equine section (SB8.13) now allows dogs to be used to move horses in areas other than livestock handling facilities (previous drafts banned the use of dogs to move horses in any circumstance).</p>
<p>SA 5.11</p>	<p>The driver must inspect livestock (except poultry):</p> <ul style="list-style-type: none"> v) on the vehicle before departure vi) within the first hour of the journey and then at least every three hours or at each rest stop, whichever comes first vii) at unloading. 	<p>There should be some inspection of poultry, this exempts all poultry transport, in some cases inspection may be possible.</p>

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<p>SA 5.15</p>	<p>Where there is a road accident involving the transport vehicle, all livestock must at the first available opportunity be;</p> <ul style="list-style-type: none"> i) assessed, in the standing position if possible, ii) removed for treatment, or iii) humanely destroyed at the accident site. 	<p>Amend to 'immediately'. The concern that this will allow them to stand a truck up and tow it with animals uninspected until they get to a yarded location. Animals should be inspected on site of the accident.</p>
<p>GA5.5</p>	<p>Livestock should be handled in a manner that minimises stress. Livestock with no room to move should not be forced, pushed or excessively handled. Where excessive handling effort occurs, facility design should be examined. Excessive yelling, noise making and sudden movements should be avoided.</p>	<p>Amend: Livestock with no room to move should not be forced, pushed, prodded or excessively handled.</p>
<p>GA 5.7</p>	<p>Calves, lambs, small deer, foals, weaner pigs, and weak or injured livestock may be carefully lifted and placed on or off the vehicle if they cannot negotiate loading ramps. Poultry should be lifted with care, either manually or mechanically, and placed in transport containers.</p>	<p>Should be a standard.</p>
<p>GA5.10</p>	<p>Electric prodders should not be used repeatedly on a single animal.</p>	<p>Would be redundant if SA5.7 was amended as suggested</p>
<p>GA 5.24</p>	<p>Ventilation should be appropriate at all times including when the vehicle is stopped</p>	<p>Should be a standard</p>

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GA5.38	Where there is any doubt about an animals fitness to resume a journey, the spell should be extended, veterinary advice sought and action taken to care for any livestock that are rejected.	Should be a standard
GA 5.40	<p>During spells, livestock. livestock should be monitored to determine whether they are drinking as expected, and if they are not drinking, action should be taken to encourage water intake.</p> <p>Actions may include ensuring livestock can access the water facilities (through appropriate stocking density, trough size and space), checking observable water quality (by flushing water lines and keeping troughs clean), adding electrolyte or molasses, and providing water on the ground or providing feed. Where there is a general problem with livestock from many sources not drinking, water chemistry should be examined.</p>	Add as example: provision of teats for bobby calves
GA 5.42	At unloading, if the facility is unmanned or out of hours arrangements are to be followed, drivers should make sure that unloaded livestock have access to water	Should be a standard
GA 4.8	Livestock (except caged poultry) that cannot walk from the vehicle ('downers') should be destroyed humanely on the vehicle, where practical. Alternatively, facilities, equipment and sufficient personnel should be available for the humane unloading of these livestock and their humane destruction.	A time frame should be included preferably "immediately" or as soon as possible.

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6	Humane Destruction	
SA6.2	Humane destruction must be carried out: <ul style="list-style-type: none"> i) on moribund livestock ii) by a competent person or under direct supervision of a competent person iii) using an approved method for the species iv) at the first opportunity. 	Amend: (i) on moribund severely injured or diseased livestock
SA 6.4	A person humanely destroying an animal must take reasonable action to confirm the animal is dead and to ensure death	Amend by deleting 'reasonable'. They must ensure death. If they can't assess this they aren't competent.
SA6.5	Firearm use must be in the frontal or poll positions except for cattle and pigs	Needs further definition of what is acceptable for cattle and pigs.
SA6.6	Captive bolt use must be in the frontal or poll positions, be accompanied by appropriate restraint and must be followed by an effective procedure to ensure death	Include " only " after first "must" to clarify meaning.
SA6.8	Animals must be assessed to be unconscious before pithing	Delete " assessed to be ". Difficulty in enforcement proving that assessment was made.

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SA6.9	Lethal injection is an approved method for all species but must be performed by a veterinarian or an approved person	The term "an approved person" is too broad as this method is restricted in most/all States by legislation. Suggested wording " must be performed under veterinary supervision ".
GA6.10	Suitable projectiles and propellant charges (loads) for the species and class of livestock and situation should be used to always achieve humane destruction with reasonable personal safety if carried out correctly. <i>Note</i> In general, firearms are the most acceptable method of humane destruction for livestock. In transport situations, the distance between the end of the firearm barrel and the animal is expected to be between 10 and 100 cm. The only approved target organ is the brain. There are three effective aiming points at the	The description in paragraph two of the notes could be reworded as follows For the frontal method, ensure the point of penetration is in the middle of the forehead at the crossing point of two imaginary lines each drawn from the centre of the eye to a point a little above the opposite ear (or to the base of the horn). The shot must enter the head at right angles to the skull so it will enter the brain and the higher reaches of the neck.

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	<p>head: frontal, poll and temporal. These positions are covered in the species standards in Part B. Before firing, the animal's head must be still.</p> <p>For the frontal method, the firearm or captive bolt should be directed at a point midway across the forehead where two lines from the topside of the base of the ears and top of the eyes intersect (pigs – from the bottom side of the ears to the eyes). The line of fire should be aimed horizontally into the skull towards the centre of the brain or spinal cord.</p>	
B1	Alpaca	
GB1.8	Lactating alpacas and crias should be inspected throughout the journey as appropriate , to ensure that crias are suckling, unless the vehicle is fitted with a surveillance device that enables continuous inspection throughout the journey.	Suggestion : replace 'as appropriate' with " at reasonable intervals"
GB1.14	Young and newly shorn alpacas (8–10 days off shears) are susceptible to windchill and should be transported in vehicles with enclosed fronts or provided with protection during weather that could cause heat or cold stress or sunburn.	Should be a standard even if covered by earlier suggestion on this issue in general standards

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B4	Cattle													
<p>SB4.1</p>	<p>Time off-water must not exceed the time periods given below:</p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Class</th> <th style="text-align: right;">Maximum time off-water (hours)</th> </tr> </thead> <tbody> <tr> <td>Cattle over 6 months old</td> <td style="text-align: right;">48</td> </tr> <tr> <td>Calves 1–6 months old</td> <td style="text-align: right;">24</td> </tr> <tr> <td>Lactating cows with calves at foot</td> <td style="text-align: right;">24</td> </tr> <tr> <td>Calves 5–30 days old travelling without mothers</td> <td style="text-align: right;">18</td> </tr> <tr> <td>Cattle in third trimester of pregnancy</td> <td style="text-align: right;">24</td> </tr> </tbody> </table>	Class	Maximum time off-water (hours)	Cattle over 6 months old	48	Calves 1–6 months old	24	Lactating cows with calves at foot	24	Calves 5–30 days old travelling without mothers	18	Cattle in third trimester of pregnancy	24	<p>Time off water not relevant to unweaned calves – separate standard or amend to :</p> <p>“Time off water, or liquid feed in the case of unweaned animals, must not exceed</p>
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Cattle over 6 months old	48													
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Cattle in third trimester of pregnancy	24													
<p>SB4.5</p>	<p>Calves between 5 and 30 days old travelling without mothers must:</p> <ul style="list-style-type: none"> i) be protected from cold and heat ii) be prepared and transported to ensure not more than 18 hours since last feed 	<p>Amend : Calves from 5 to 30 days (provides coverage of 5 and 30 day old calves not otherwise covered)</p> <p>Add : be kept clean and and dry</p> <p>(ii) - ambiguous - prepared and transported to ensure not more than 18 hours since last feed." it seems as if the part of the sentence is missing. Does it mean that they should be fed every 18 hours?? or does it mean that they have to be fed within 18 hours of leaving the farm.? or does it mean that they have to be killed within 18 hours of leaving the farm?</p>												

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	<p>have an auditable and accessible record that identifies the date and time that the calves were last fed, unless the journey is between rearing properties and is less than 6 hours duration.</p>	<p>- becomes redundant if provision for liquid feed is provided in SB4.1</p> <p>Calves 5-30 days of age require a 10-12 hour maximum transport time for bobby calves. They must be fed within 6 hours of transport. This is consistent with overseas recommendations(benchmark)</p> <p>Suggestion: reinstate time and distance requirements currently in GB4.3</p> <p>ii) be fed within six hours before loading 24 hours</p> <p>iii) must not be transported for a time exceeding 10 hours , or a distance exceeding 500 kilometres, whichever comes first, from loading to the destination, unless; the calves are intended for slaughter and ,exceeding this time and distance is necessary to reach the nearest available, operating, livestock -processing establishment for calves.</p> <p>Calf producers must be required to identify such calves and keep birth date records. This permits inspectors to follow through where doubt exists about age.</p>
<p>SB4.7</p>	<p>Dogs must not be used to move bobby calves less than 30 days old</p>	<p>Amend: dogs and electric goads must not be used to move bobby calves less than 30 days old,"</p>

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<p>GB4.3,</p>	<p>Calves should be transported for the shortest time possible. Efficient aggregation practices for calves between 5 and 30 days old should be used to reduce journey times to final destinations. Direct marketing should be used when possible. Calves should not be consigned through saleyards that do not have holding facilities suitable for calves. They should not be transported for a time exceeding 10 hours, or a distance exceeding 500 kilometres — whichever comes first — from loading to the destination, unless the calves are intended for slaughter and exceeding this time and distance is necessary to reach the nearest available, operating, livestock-processing establishment.</p>	<p>Calves should be transported for the shortest time possible.</p> <p>The section on 10 hours and maximum distance of 500km should be reinstated to a standard (as suggested for SA4.5).</p>
<p>GB 4.4</p>	<p>Calves between 5 and 30 days old travelling without mothers should have dry, withered navel cords and hooves that are not soft and bulbous. They should not travel until they are 8 days old for journeys approaching 24 hours.</p>	<p>Should be a standard.</p> <p>The use of these characteristics is a well communicated standard industry practice as indicated in Dairy Australia’s “Fit for Sale” guidelines</p> <p><i>They shouldn’t be being transported for 24hours (even if max time of feed remains 18hrs this is breaching the standards).</i></p>
<p>GB4.5</p>	<p>Calves born earlier than a normal pregnancy term (including induced calves) should be at an equivalent stage of fitness when transported, compared with normal, full-term calves.</p>	<p>This should be a standard</p>

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GB4.10				<p>The following space allowances should be provided:</p>	<p>Table should be completed using FAWC formula [$sd = 0.021W^{0.67}$ sq m] ie. 50kg=0.288 sq m; 55 kg=0.307 sq m. 5 day old calves in Australia/NZ average 40-60kg LW etc....Sue Hides says 0.33 sq m</p> <p>Weight ranges to include bobby calves should be added to the table</p>
	Mean liveweight (kg)	Minimum floor area (m²/head)	Number of head per 12.2 m bottom deck		
	100				
	150				
	200				
	250	0.77	38		
	300	0.86	34		
	350	0.98	30		
	400	1.05	28		
	450	1.13	26		
	500	1.23	24		
	550	1.34	22		
	600	1.47	20		
	650	1.63	18		

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<p>GB4.11</p>	<p>Calves under one month old should have sufficient space to lie down on their sternum.</p>	<p>- (this is 0.33 m2 per calf! for the average bobby calf)</p> <p>Amend : "Calves under 30 days of age must have sufficient space to allow all calves transported in the same space to have sufficient space to lie down on their sternum and sufficient space to rise."</p> <p>This should be a standard</p>
<p>GB4.12</p>	<p>Calves less than 30 days old should have:</p> <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. 	<p>This and/or GA3.11 should be a standard</p>
<p>GB4.13</p>	<p>During cold weather, additional actions should be taken to protect calves from cold stress and windchill during transport</p>	<p>Guidelines should provide some suggested actions which could be taken</p>
<p>GB4.15</p>	<p>Calves between 5 and 30 days old travelling to livestock processing plants should be delivered within 10 hours of leaving the property of origin.</p>	<p>This is a duplication of GB4.3 and the proposed amendments to SA4.5 and should be removed</p>

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Other Guidelines		There is no mention in the standards or guidelines about transport vehicles maintaining some sort of cleanliness prior to transporting bobby calves. There is a general one (GA3.1). Should there be another one added specifically for calves?
B7	Goats	
GB7.5	Goats to be transported longer than 24 hours should be fed and watered within 5 hours before loading.	Should be a standard
GB7.6	<p>Between mustering and loading, water and feed should be provided for goats if:</p> <ul style="list-style-type: none"> ▪ goats are to remain in the yards for more than 24 hours ▪ goats are expected to be off-water for 24 hours or more during travel ▪ goats are weak, wet, pregnant or with kids at foot ▪ goats are fatigued from mustering, have been mustered over a long distance from pastoral country, or have been mustered by helicopter. 	Should be a standard
GB7.9	Goats in the third trimester of pregnancy, lactating goats and kids younger than 7 days should not be deprived of water for more than 12 hours. They should be provided with food and water upon arrival and should be spelled for at least 12 hours before starting another journey.	Should be a standard

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<p>GB7.10</p>	<p>Goats more than 4 months pregnant should be transported under the following conditions:</p> <ul style="list-style-type: none"> • 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 goats should be segregated <p>veterinary advice should be sought</p>	<p>Should be a standard</p>
<p>GB7.22</p>	<p>Electric prodders should not be used on pregnant goats.</p>	<p>Should be a standard</p>
<p>B8</p>	<p>Horses</p>	
<p>SB8.2</p>	<p>Journey time may be extended to 36 hours only under the following conditions:</p> <ul style="list-style-type: none"> i) horses must be watered and fed on the vehicle every 5 hours ii) horses are not exposed to the natural elements iii) there must be sufficient space of 700 mm wide 2350 mm long per stall iv) flooring must be suitable v) regular assessments must be made the horses are fit for 	<p>(ii) what dose this mean? Not all horse trucks are fully enclosed. Many are transported in open top cattle crates. Eg slaughter horses, farm horses. Amend : horses are not exposed to extremes of heat or cold</p> <p>(iii) Amend : sufficient space of at least" 700mm..... to allow for larger stalls if available/desired.</p>

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	<p style="text-align: center;">the remainder of the intended journey</p> <p>v) horses must be spelled for 24 hours before starting another journey.</p>	<p>iv) should read "flooring must be drained sufficiently to remove all urine" as per 10.8 of Model Code and Vic Code.</p>
SB8.6	<p>Horses should be at least a body condition score of 2 before transport</p>	<p>Amend: Horses should be at least a body condition score of 2 before transport. Horses below condition score 2 should only be moved after veterinary advice and for the shortest distance necessary.</p>
SB8.15	<p>The approved method for humane destruction of horses are;</p> <p>(i) <i>horses</i> over 6 months old, a firearm aimed in the frontal position or lethal injection</p> <p>(ii) <i>foals</i> under 6 months old, , a firearm aimed in the frontal position or lethal injection</p>	<p>Repetitive, combine</p>
GB8.8	<p>Adult horses should be fed and watered every 5 hours and as soon as possible after unloading, with a suitable quality and quantity of feed and water to minimise colic risk.</p>	<p>Food provided must be of suitable quality and quantity for horses to be able to consume sufficient for their physiologic needs on a daily basis. [Sub-standard or inappropriate fodder for horses will likely cause colic, quickly rendering horses unfit for travel, potentially during travel when supervision is not constant} This should be a standard</p>

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B9	Pigs	
SB9.5	<p>Approved methods for humane destruction are: i) for pigs are firearm aimed in the frontal or temporal position, captive bolt aimed in the frontal position ii) for piglets less than 15 kilograms are blunt trauma, firearm, captive bolt or lethal injection.</p>	<p>Amend: Approved methods for humane destruction are: i) for pigs : firearm aimed in the frontal or temporal position, captive bolt aimed in the frontal position ii) for piglets less than 15 kilograms : blunt trauma, firearm, captive bolt or lethal injection.</p>
GB9.1	<p>GB9.1 Health conditions that could cause pig welfare to decline during transport and should be considered unfit for transport include any of the following: i) lameness conditions where a pig can place weight on all legs</p>	<p>should read'cannot place weight on....'?</p>
GB9.8	<p>In hot weather strategies should be considered to minimise heat stress and avoid windburn and sunburn....</p>	<p>There should be a standard eg must enclose the top of pig transport vehicles and minimise stationary periods in hot weather.</p>

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GB 9.14	When handling or moving pigs, stockpersons should use their body position.	This guideline is unworkable and such advice may be dangerous. Suggestions such as the use of moving boards and leather 'slappers' should be added.
B10	Poultry	
SB10.5	Poultry with broken legs or poultry that are unable to walk must not be transported.	This should be expanded to require immediate euthanasia.
GB10.26	When removed from cages, end-of-lay hens should be held either firmly around the body or by both legs, not by a single leg, which could cause injuries. A breast support slide should be used for end-of-lay hens.	Should be a standard.
GB10.31	The preferred methods for humane destruction of poultry are cervical dislocation or use of CO ₂ gas. <i>Note</i> Cervical dislocation involves partial separation of the head or brain from the spinal cord. The resulting damage to the nervous system leads to cardiac and respiratory arrest and death. The method requires a high degree of skill to be humane.	Is lethal injection not acceptable? CO ₂ should only be done using proper equipment and by people competent in this method, concern over its general use.

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B11	Sheep									
SB11.1	<p>Time off-water must not exceed the time periods given below:</p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">Class</th> <th style="text-align: left;">Maximum time off-water (hours)</th> </tr> </thead> <tbody> <tr> <td>Sheep over 4 months old</td> <td style="text-align: center;">48</td> </tr> <tr> <td>Lambs under 4 months old</td> <td style="text-align: center;">28</td> </tr> <tr> <td>Ewes known to be more than 14 weeks pregnant excluding the last two weeks</td> <td style="text-align: center;">24</td> </tr> </tbody> </table>	Class	Maximum time off-water (hours)	Sheep over 4 months old	48	Lambs under 4 months old	28	Ewes known to be more than 14 weeks pregnant excluding the last two weeks	24	<p>48 hours transportation without a break or water is excessive. Current legislation in Victoria would consider this a cruelty. Our transport code currently allows max 24 hours for immature ruminants if followed by a 12-24 hr rest. This can go to 36hrs if 24 hr rest is provided. For adults the times are 36/48 if followed by 24 hrs rest. Sheep in poor condition transported from WA to Victoria approx 30-36 hours frequently have high mortalities.</p> <p>4mo is being chosen as when a sheep is an adult when perhaps 8-10 months is more appropriate</p>
Class	Maximum time off-water (hours)									
Sheep over 4 months old	48									
Lambs under 4 months old	28									
Ewes known to be more than 14 weeks pregnant excluding the last two weeks	24									
SB11.2	<p>If sheep over 4 months old have been off water for 48 hours, they must be spelled for 36 hours before starting another journey.</p>	<p>No provision is made for ewes in the last 2 weeks of pregnancy similar to that in other species when it might be argued that sheep are more at risk because of pregnancy toxemia. An additional clause is needed.</p>								
GB 11.7	<p>“Under cold conditions in southern Australia, time off water should only be extended under the following conditions: i) weather conditions are considered to be a welfare risk due to wind chill hypothermia ii).....</p>	<p>This reads as if it is a guideline advising a breach of the standard. It is now a redundant guideline and should be removed</p>								

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