



Australian Pork Farms Group
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Land Transport RIS Submissions
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To whom it may concern:

Submission to Animal Health Australia: Transport Code of Practice Public Consultation

This is a submission from the Australian Pork Farms Group [APFG] to Animal Health Australia's (AHA) public consultation into the *Transport Code for the Land Transport of Livestock*.

In this submission, we wish to highlight principally where we believe proposed changes to the Transport Code will impact our business by creating changes that we believe will:

- Have a detrimental impact on the welfare and wellbeing of our animals [as pigs are different from other livestock],
- Will force changes that take away the reasonable role of our staff in understanding and ensuring the needs of 'pigs' [as opposed to other farm animals] have their needs met while not adversely impacting their welfare, and
- Will potentially impact how our business can function [and its economics], given the extremes in weather we must cope with, coupled with the distances we must move animals.

We would request that these items be considered and addressed by AHA when reviewing public submissions.

We believe in improving the welfare of our pigs as this directly impacts on our capacity to maintain our high health status needed for our domestic and our international customers. But our business is already severely impacted by high grain costs, high volumes of imports, the drought, high freight costs and recent animal welfare legislation for pigs on-farm.

We hope a balanced and sensible approach can be taken using our experience and knowledge of over 3 decades of operation as stockpeople, as well as transporters of animals over considerable distances without impact on our animals or final product quality.

I would be happy to discuss any matters raised in my submission with Animal Health Australia, given the opportunity to do so and can be contacted on 08 8370 1801, or by email at rod@austporkfarms.com.au.

Yours sincerely,

Rod Hamann

CEO – Australian Pork Farms Group

Submission to Animal Health Australia:

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I. APFG BUSINESS OVERVIEW

The Australian Pork Farm Group is made up of 3 businesses:

- Shea-oak Piggery Holdings Pty Ltd (formed in 1992)
- Wasleys Piggery Pty Ltd (formed in 1994)
- Australian Pork Farms Pty Ltd (formed in 2001)

APFG is part of an Integrated Supply Chain consortium - where APFG represents the majority shareholders in a number of businesses from farms to wholesale meat sales:

- The 18 owners and shareholders of APFG represent some of the major independent piggery operators in their own right in SA and Victoria.
- They are the majority shareholders [owning over 75%] of “**Auspork Limited**” – the marketing and abattoir owning entity based in Laverton [Victoria], which was developed by this group to assist stronger supply chain linkages ‘Beyond the farm gate’ for its Farmer Suppliers.
- APFG is also a direct Capital investor in the **Big River Pork** Abattoir and Boning Operation at Murray Bridge – and along with Auspork own 50% of this business.
- 15 years ago these independent family farmers first came together to:
 - Buy out the assets of Metro Meats (ex Adelaide Steamship Company) who had decided to divest themselves of their piggery assets. These farmers pooled their resources and pig farming investment capital to create larger enterprises in the belief this was required to be competitive for their long term futures.
 - These Farm businesses realized the need for an integrated supply chain even in these early days and subsequently formed the Auspork companies, who have owned Abattoirs, exported to both Japan and Singapore, and are now [as well as the above], involved in value adding branded Pork operations based at Laverton, Vic.
 - In 2003, the group (prior to the relaxing of the IRA protocols and US FTA announcements) took the decision to purchase the George Weston Foods pig farms in SA.

A summary of the key aspects of the combined businesses today would be as follows:

- 16,000 sows producing in excess of 320,000 pigs per annum sold to key abattoirs in SA and Victoria. Together the group represents approximately 33% of the SA Industry’s combined 50,000 current sows.
- The principle shareholders of the above companies are pig farmers in their own right, and together own another estimated 5,000 plus sows and hence transport an additional 100,000 animals per year.
- All sow Breeder farms are owned; but have a network of contract farmers in both states that house and manage up to 40% of our total production. (These contract

sites of typically local farmers take no market risk and receive a flat fee for use of facilities and/or labour).

- The group employs over 130 people directly; PLUS our ‘contract’ enterprises have (we estimate) another 30 plus full and part time staff.
- We spent in excess of \$1,200,000 last year on Animal movement freight, with an expectation for this to be well over \$1,500,000 this year.
- This expense is for movement of small growing pigs between growout sites; AND for Market ready animals to Abattoirs across South Australia BUT also into and from Victoria.
- We have chosen to move animals with a network of Regional stock carriers who work in the Rural communities where our businesses function – and where our community economic impact may be felt.
- The majority of our sites are in SA at present, with a few in Victoria. In general our haulage times are 2 to 4 hours – but with a proportion of some runs from interstate being 7 to 10 hours. This is due to the forced rationalization of our Abattoir industry, as we try to drive down costs to compete with the increasing volumes of imports of oversea’s meat.

II. COMMENTS - Livestock Standards and Guidelines

We would make an initial overarching comment in areas where we believe pigs are different from other livestock. This impacts much of what can and cannot be done at loading, and during transport:

- Most piggeries have strict bio-security protocols that are followed.
- This means trucks must arrive clean and disinfected.
- And importantly – the farm staff and driver can only talk from a distance – and can only walk, move and come into certain areas, often separated by a fence line.
- Certainly, Drivers may NEVER set foot inside a piggery race or pen
- AND Stockpeople must NEVER set foot inside a truck or on a loading ramp.
- These same bio-security issues impact where we allow some vehicles to travel, park and stay – as exposure to other pigs [even without direct contact] and their drivers, can be a major bio-security risk with considerable likelihood of disease transmission resulting in deaths that may be as high as 10% or more in herds.

These procedures and restrictions do limit some of the actions that can be taken and should be born in mind as the following items are discussed.

Livestock Standards and Guideline Reference No.	Concern
<p>1 – Responsibilities and Planning</p> <p><i>SA 1.1 iii) – the transport for the loading, journey and unloading including selection as ‘fit for the intended journey’ and additional inspections of livestock and spelling periods</i></p>	<ul style="list-style-type: none"> • Selection as ‘fit for the intended journey’. I would suggest is a ‘mutual’ responsibility at loading time, between the trained stockperson and a ‘qualified’ transport

	operator – see below.
<p>GA1.3 – “The driver or transport company is responsible for the livestock...”</p> <p>iii) inspecting and assessing livestock at loading to ensure that they are fit for the intended journey</p> <p>v) making sure that the management, care or humane destruction of any livestock....”</p>	<ul style="list-style-type: none"> • iii) this would be impossible at our piggeries before loading, due to bio-security reasons not allowing drivers onto the property. Nor are they trained in these areas to the same extent as Piggery staff. They should be allowed to voice concerns and discuss issues re animals with Farm staff during the loading process. • v) assumes that all transports carry a captive bolt gun [we WOULD NOT ALLOW any to carry a rifle/gun]; and have been trained in its use. We would argue that the OH and S issues of trying to do this during transport are too high [or impossible to do] and that the preferable thing to do is euthanase immediately upon reaching the destination and unloading.
2 – Stock Handling Competency	Concern
<p>SA2.1 – “A person involved in handling, selection, loading... must be competent”</p>	<ul style="list-style-type: none"> • No problems with this standard • BUT it will require considerable work to get Truck Drivers trained in an industry that already has very limited labour. • It will be critical to not ‘try to do too much’ – a basic knowledge and approach is all that is required for good welfare outcomes in our view. Farm Managers and staff – who in most cases still own the animals until they are slaughtered – will take the most ‘ownership’ in ensuring competent drivers handle their staff.
4 – Pre-transport selection of livestock	Concern
<p>SA4.1 –</p>	<ul style="list-style-type: none"> • In the case of pigs, we believe where an animal has continued to grow well as evidenced by body condition, [so is eating and growing], and is able to walk on its own up a ramp, it is fit for the trip. • We should not have to destroy a lame animal if it is obviously healthy. • This has been discussed with State Health regulators and defined in our state guidelines for when euthanasia should occur.
<p>GA4.7 – “Where water is provided, it should be easily accessible to all livestock and livestock should be able to drink with normal posture.”</p>	<ul style="list-style-type: none"> • This is difficult to fully comply with for pigs due to how they transport and act within a group situation [dominance].

	<ul style="list-style-type: none"> • We would agree with this for long trips; but consideration must be given to whether it is a critical need [or not] given the length of the trip. • Or else it becomes safer for a transporter NOT to try to supply water.
5 – Loading, transporting and unloading livestock	Concern
SA 5.4 – “Drivers (except for train drivers and driver 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.”	<ul style="list-style-type: none"> • Not all drivers are stockmen, and they can’t perform this standard. It should be an agreed approach and density that is unambiguous; or the loading farm and stockperson should take responsibility provided they are supplied with the correct information by the transporter. • Again – the animals are the farms responsibility to get safely to market or they do not get paid. They should have this role. • If this responsibility is put on Drivers they may take a very safe [for them] approach, but very expensive to our industry. If in doubt, load less pigs • We would suggest that there must be an awareness of requirements.
SA5.11 – “The driver must inspect livestock (except poultry): i) On the vehicle before departure ii) Within the first hour of the journey and then at least every three hours or at each rest stop, whichever comes first iii) At unloading	<ul style="list-style-type: none"> • i) Agree • ii) It is not normal to stop and often this is the worse thing that can be done for the pigs wellbeing, especially in summer. • And given the areas we are travelling in, this has little value as to what the transporter would do one stopped – especially on less than 6 to 8 hour trips • iii) OK
GA5.29 – “...This might include providing cover for the vehicle, enclosing the front of the vehicle, providing food before loading...”	<ul style="list-style-type: none"> • Providing food before loading can cause death in pigs and will do more harm than good!!
SB9.4	<ul style="list-style-type: none"> • We agree that electric prodder use should be minimised with pigs • However our experience is that there may be greater welfare harm to restrict use completely. • We do not allow use in the farm OR on the race, • But we do allow it to be used inside the truck when the driver is trying to get the last pigs into or out of a pen ‘within the truck’. If pigs are not quickly penned up, there is greater stress and more likelihood of welfare issues.
GB9.1	<ul style="list-style-type: none"> • Again in SA we have guidelines that allow

	<p>these animals listed in i), ii), iii) and iv) to be transported provided they are not extreme cases and the animal is still in a “fit” body condition.</p> <ul style="list-style-type: none"> • A one statement fits all is a wrong approach. • These guidelines show pictures that are very beneficial to all involved. • I would request a review and comparison of SA’s fit-to-load guidelines versus the proposed Portec standards, before final approval. •
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Attachment A - Pig Standards and Guidelines

Pig Specific Standard or Guideline Reference No.	Concern
SB9.2 – “Journey time may be extended to 48 hours only under the following conditions: iv) Pigs must be provided with water, food and rest for 24 hours before starting another journey	<ul style="list-style-type: none"> • We agree with this extension without the need for resting • As stopping will jeopardise pig health and bio-security. • This is especially important for transportation of breeder pigs travelling out to 48 hours • Also – depending on the load and circumstances of Breeder pigs it may well be wrong, unsafe or unnecessary to spell for 24 hours.
SB 9.4 –	<ul style="list-style-type: none"> • Disagree as previously stated with a blanket banning of electric Prodders. • Please see above
GB 9.5 –	<ul style="list-style-type: none"> • Agree – thank you
GB 9.15 –	<ul style="list-style-type: none"> • As previously stated, we think humane destruction during transport is high risk from and OH and S viepoint • We would also NEVER allow a driver to have a rifle – we do not allow this on our farms. • Small animals should not have rifle or captive bolt used.

III. CONCLUSION

Overall, we would commend the document in its format to date. We appreciate the approach and also that there have been distinctions made for pigs.

At the same time, I would also comment that I worked for 16 years in the USA. As Canada and the USA are major competitors with Australian Pork in this country, I would suggest it is worthwhile to understand their trucking standards:

- They haul as long or even further distances, AND in even wider extremes of heat and cold.
- Their restrictions on transport are no-where near as detailed or onerous as are proposed here,
- NOR do they have the same focus on Welfare.

We believe that there need to be rules and guidelines that ensure the humane handling of our animals, but are concerned that this does not become over prescriptive, or that we put responsibilities on drivers that they;

- cannot,
- will not, or
- should not be asked to do.

This will only make a bureaucrat happy because they ‘think’ something is occurring, when in reality it;

- is not able to occur, OR
- the cost to do so just means it is prohibitive, OR
- we are not able to attract drivers into the industry given the combination of activities we ask them to undertake and/or the pay and conditions we provide

The regions in which our farms work and buy the majority of their goods and services rely on our business to provide employment for over 120 people directly, another 25 to 30 farmer Agisters, and we estimate another 30 plus people directly in transport, feed manufacture, maintenance and other support roles. ALL IN RURAL COMMUNITIES

We estimate we add around \$15 to \$20,000,000 directly into rural communities via these wages and services that flow directly from our farms. Further cost additions on our business may well be the final blow given the current economic environment we find ourselves in. [Our current freight levies alone due to fuel price increases are over 20%].

Yours Sincerely,

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