

Animal Welfare Standards Public Consultation
P. O. Box 196
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27 May 2008

Submission: Draft *Australian Standards and Guidelines for the Welfare of Animals: Land Transport of Livestock*

RSPCA Qld recognises the major step forward these *Australian Standards and Guidelines for the Welfare of Animals: Land Transport of Livestock* represent. The aim to have national standards that will be adopted by all states should be applauded. Replacing the many existing codes with one document is a practical move. RSPCA Qld also recognises the improved standards in many areas of this draft, for example, the clear identification of the persons responsible for livestock during transport.

RSPCA Qld would initially like to fully endorse and support the submission made by RSPCA Australia. Our state specific submission raises a number of areas of additional concern.

- *Detailed records kept for all transport of livestock.* In this draft, RSPCA Qld believes there are inadequate requirements for detailed documentation to be kept of the animals throughout their journey. SA1.2 deals only with journeys in excess of 24 hours and SB4.5 only with calves between 5 and 30 days of age.

RSPCA Qld believes that detailed records (logs) should be mandatory for all journeys. These records should accompany the animals from the beginning of the transportation (mustering) to the final stage. They should be in the possession of the person responsible for the animals at every particular stage of the journey. Information in the records should include identification details of all animals included in the consignment; time taken for each step of the process including mustering, time waiting before loading, spells and so on; water and food intake times; comments on animals' condition; any specific actions taken and why; and so on. These records should be available for auditing at any time.

The necessity to keep such records will ensure the person responsible for the animals at each stage will be more aware of and accept their responsibility, and take actions and make decisions based on animal welfare considerations.

- *Consideration of train transportation.* The RIS acknowledges that rail transportation occurs in Queensland and Chapter 1 of the *Standards and Guidelines* deals with the responsibilities of railway authorities, but any consideration of rail transportation of livestock beyond this is absent. RSPCA Qld believes that information is needed about the advantages and disadvantages of land and rail transport, that is, a comparison of these methods would be useful. Is rail transport better where available? Should consigners be considering rail over land?

GA5.33 acknowledges that train drivers cannot conduct inspections during the journey and places the responsibility with the livestock agents, however what this means in practical terms is not mentioned. Also, some of the other guidelines in chapter 5 are not applicable to rail transportation, for example, GA5.35 requires drivers to be 'flexible when determining timing and length of stops and spells in transit'. This is unlikely to be possible with rail transport as the trains are probably running to a schedule. Therefore, how stops and spells can be achieved with rail transport should be dealt with.

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- *Transportation of calves.* Most research agrees that substantial rumen development in calves takes at least 2 months even when techniques are used to accelerate the process. Given this, RSPCA Qld believes that the following changes are necessary to Chapter B4.
 - SB4.1 should recognise that calves to 2 months of age need more regular access to water. Therefore the age categories should be i) calves less than 5 days of age; ii) calves 5 days to 2 months of age; iii) calves 2-6 months of age; and iv) cattle over 6 months of age. RSPCA Qld would like to see the age that calves must reach before being allowed to be transported be raised to 7 days.
 - Maximum time off water should reflect these age categories: i) 6 hours; ii) 18 hours; iii) 24 hours; and iv) 48 hours.
- *Curfews.* Food and/or water curfews before transportation are dealt with by a note on page 18. No other guidance is provided on the issue. Information on what is acceptable behaviour and what is not should be included.
- *Dragging.* Dragging of animals in the loading/unloading process is not mentioned and RSPCA Qld believes it should be specifically banned for all species and all ages.
- *Contingency measures.* Contingency arrangements are covered in GA1.13 – GA1.19. RSPCA Qld believes that well thought-out, transparent and detailed contingency plans are essential and deserve to be included as a standard rather than just as guidelines. Good contingency planning could markedly reduce the suffering of many animals should an unplanned event occur.

RSPCA Qld welcomes this opportunity to comment on the Draft *Australian Standards for the Welfare of Animals: Land Transport of Livestock*. We look forward to seeing national standards being adopted in this important area.

I trust that you will give this submission your full consideration. If you have any queries please contact Dr Mandy Symons, Scientific Research Officer, at RSPCA Queensland who will be happy to assist you.

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