

Kate Joseph
PrimeAg Enterprise
120 Josephs Rd
Tyrendarra
Vic 3285
Ph: 03 5529 5329/0428 541158
Fax: 03 5529 5525
Email: primeag@westvic.com.au

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Animal Welfare Standards Public Consultation
PO Box 196
DICKSON ACT 2602
consultation@animalwelfarestandards.net.au
Fax: (07) 5429 8486

To whom it may concern:

Submission to Animal Health Australia: Land Transport Standards Public Consultation

This is a submission to Animal Health Australia on the draft Animal Welfare Standards and Guidelines for the Land Transport of Livestock, which is open for public consultation.

1. Personal Details

Kate Joseph
PrimeAg Enterprise
120 Josephs Rd
Tyrendarra Vic 3285
Ph: 03 5529 5329/0428 541158
Specialist prime lamb producer

2. Farm/Enterprise Background

I run a specialist prime lamb production system in South West Victoria, turning off 1500 Poll Dorset cross lambs targeting the heavy trade market. I have been involved in the management of the family farm for about 25 years, and have been sole proprietor since 2000. More than 90% of my production is sold by the over-the-hooks method meaning that I retain ownership of the lambs until the carcass goes over the scales. How my lambs are handled and transported to the abattoirs is very important to me, as I am the one penalized if any bad practices occur.

3. Land Transport Standards and Guidelines

Comments on the draft Land Transport Standard and Guidelines include:

Standards and Guidelines Reference:	Comment

<p>SA 1.2 <i>“For a journey reasonably expected to exceed 24 hours, there must be one or more documents that accompany the livestock...”</i></p>	<p>The LPA NVD is widely accepted throughout the industry and used extensively for sales and stock movements. I believe that this document should be the only travel document that producers are required to complete and that correctly completed, allows me to meet my responsibility as a producer regarding travel documentation.</p>
<p>GA1.2 <i>“The livestock consignor is responsible for the livestock until they are loaded onto the transport vehicle.”</i></p>	<p>This guideline contradicts the standards, as the standards (SA1.1) do not include the consignor being responsible for loading but rather lays the responsibility with the transporter. It is important that there is consistency between the guidelines and standards to avoid confusion.</p>
<p>GA2.2 <i>“Supporting evidence of competency should include the following:</i></p> <ul style="list-style-type: none"> • <i>records of on-the-job training</i> • <i>relevant records of experience</i> • <i>recognised training and staff training registers</i> • <i>induction training</i> • <i>supervisor sign-off for specific tasks.”</i> 	<p>As is the case with many farmers, I have been handling stock and carrying out many procedures since I was young. I very strongly believe that relevant experience should suffice as evidence of competence and understand that this is accepted by OIE. This guideline should read “Supporting evidence of competency should include any of the following.....”</p>
<p>SA5.8 <i>“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”</i></p>	<p>I agree with the wording of this standard and think that it is important that dogs that are in the habit of biting should be muzzled when working in yards or restricted areas. However I believe that during mustering and in paddock situations dogs should not be restricted by muzzles as in these situations dogs are generally not in such close proximity to livestock and they are frequently panting and puffed and possibly drinking and these actions should not be limited by muzzles.</p>
<p>B11- Specific Requirements for the Land Transport of Sheep</p>	

<p>SB 11.1 <i>"Time off water must not exceed the time periods given below:</i></p> <table border="0"> <thead> <tr> <th>Class</th> <th>Maximum time off water (hours)</th> </tr> </thead> <tbody> <tr> <td><i>Sheep over 4 months old</i></td> <td>48</td> </tr> <tr> <td><i>Lambs under 4 months old</i></td> <td>28</td> </tr> <tr> <td><i>Ewes known to be more than 14 weeks pregnant excluding the last 2 weeks"</i></td> <td>24</td> </tr> </tbody> </table>	Class	Maximum time off water (hours)	<i>Sheep over 4 months old</i>	48	<i>Lambs under 4 months old</i>	28	<i>Ewes known to be more than 14 weeks pregnant excluding the last 2 weeks"</i>	24	<p>I strongly support the maximum water deprivation times in SB11.1. These times are not random numbers but have been tested in research done by CSIRO. CSIRO have shown that adult sheep traveling for up to 48 hours without water causes no compromise to welfare. No producer or processor will intentionally compromise their animal's production, or meat quality with detrimental management practices and the time periods must be based on science.</p>
Class	Maximum time off water (hours)								
<i>Sheep over 4 months old</i>	48								
<i>Lambs under 4 months old</i>	28								
<i>Ewes known to be more than 14 weeks pregnant excluding the last 2 weeks"</i>	24								
<p>GB 11.7 <i>"Under cold conditions in southern Australia, time off water should only be extended under the following conditions:</i></p> <ul style="list-style-type: none"> <i>i) weather conditions are considered to be a welfare risk due to wind chill hypothermia</i> <i>ii) sheep are assessed to be fit for the remainder of the intended journey</i> <i>iii) the additional time off water is spent on a stationary vehicle or in a facility</i> <i>iv) a document states the location, date, start and finish times of the delay."</i> 	<p>Currently this is a guideline however I believe that this would make more sense if it were a standard. Stock are transported through all seasonal conditions and if cold conditions occur when livestock have already been off water for close to the maximum time allowed in 11.1 then the transporter could be compromised if he/she tries to do the right thing and stop the journey to avoid excess wind chill and cold stress occurring. If this were a standard then transporters would be more comfortable with putting the animal's welfare as a priority with the knowledge that they are still acting within the law.</p>								
<p>GB11.8 Loading densities table</p>	<p>I believe that the loading densities table should remain in the guidelines rather than be put in to the standards. There are many factors which affect loading density such as wool length, size of the animal, distance traveled, weather conditions, condition of the animals and whether they have horns to name a few. For this reason the loading densities should be recommendations for use more appropriately positioned within the guidelines rather than a specified standard.</p>								

4. Regulatory Impact Statement

<p><i>'Option B: the proposed standards' - 'expected costs are considered to be outweighed by the expected benefits'.</i></p>	<p>I support Option B of the Regulatory Impact Statement because the expected costs are considered to be outweighed by the expected benefits. It is important the livestock industry should not incur higher costs than necessary as in Option B.</p>
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I believe that Codes of Practice are important but equally important is that farmers are not unnecessarily restricted in running their business by unrealistic requirements on their management or by excessive paperwork. Wherever possible standards must be supported by respectable scientific evidence. As a farmer the welfare of my animals is paramount. My profitability is dependent on high levels of production and I cannot achieve this if the welfare of my animals is compromised, even in the short term. As I stated earlier, I market all my animals in a manner where it is in my best interest that their welfare is paramount. I support the Land Transport Standards and Guidelines, with the changes mentioned above, as I believe the intentions are in the best interest for my business.

Yours sincerely

Kate Joseph
PrimeAg Enterprise