

AUSTRALIAN STANDARDS AND GUIDELINES FOR THE

WELFARE OF ANIMALS

LAND TRANSPORT OF LIVESTOCK

PUBLIC CONSULTATION SUBMISSION

WOOLPRODUCERS AUSTRALIA

26 MAY 2008

Contact:
Alexandra MacLennan
Level 1, NFF House
14-16 Brisbane Ave
Barton ACT 2600
P 02 6273 2531
E amaclennan@nff.org.au

Introduction

WoolProducers Australia (WPA) is the peak national body for the wool industry in Australia and represents over 14,000 farmers whose primary business is growing wool. We are the national voice on behalf of producers, advocating their interests to both the Federal Government and internationally.

WPA has been closely involved with the development of the Standards and Guidelines as a member of the Standards Reference Group. WPA is supportive of the process to revise existing Model Codes of Practise into standards and guidelines, with the standards to be implemented consistently into State and Territory legislation.

WPA supports the Australian Standards and Guidelines for the Welfare of Animals Land Transport of Livestock with the amendments outlined in this review.

PROPOSED AMENDMENTS – 2 Stock Handling and Competency

GA2.2 Supporting evidence of competency should include the following:

- records of on-the-job training
- relevant records of experience
- recognised training and staff training registers
- induction training
- supervisor sign-off for specific tasks

Alternative Wording

GA2.2 Supporting evidence of competency should include **any of** the following:

- records of on-the-job training
- relevant ~~records of~~ experience
- recognised training and staff training registers
- induction training
- supervisor sign-off for specific tasks

Comments

Supporting evidence of competency does not need to include all of the points listed - one of the points listed is more than adequate to demonstrate competency.

The guideline also needs to be consistent with the definition of competency outlined in the glossary, therefore we recommend “records of” be removed and the addition of ‘any of.’

PROPOSED AMENDMENTS – 4 Pre-transport Selection of Livestock

GA4.4 Effective management of livestock considered not fit for the intended journey should include, but is not restricted to:

- effective containment in a suitable holding area
- rest
- provision of shelter, feed and water
- veterinary treatment
- humane destruction

Alternative Wording

GA4.4 Effective management **options for** livestock considered not fit for the intended journey should include, but **are** not restricted to:

- effective containment in a suitable holding area
- rest
- provision of shelter, feed and water
- veterinary treatment
- humane destruction

Comments

The way the guideline is currently worded implies that all the provisions listed are appropriate for an animal considered not fit for transport. Adding “options for” makes

the guideline clearer e.g. humane destruction will not necessarily be the answer for an unfit animal.

GA4.6 Access to water should be provided by the livestock consignor before loading if the total permitted time off water is reasonably expected to be reached during the intended journey and if this is an option to address the provision of water in the transport process.

Alternative Wording

~~**GA4.6** Access to water should be provided by the livestock consignor before loading if the total permitted time off water is reasonably expected to be reached during the intended journey and if this is an option to address the provision of water in the transport process.~~

Comment

It was agreed at SRG6 GA4.6, which was originally a standard, be removed from the document not moved to the guidelines. The guideline does not make sense and adds nothing to the document.

WPA has an email from Kevin Dewitte on 8 February 2008 stating that GA4.6 was removed from the document - we do not support the inclusion of GA4.6.

PROPOSED AMENDMENTS – 5 Loading, Transporting and Unloading Livestock

SA5.1 The person receiving the livestock must make arrangements for separating weak, ill or injured livestock for rest and recovery, appropriate treatment and humane destruction and disposal of dead stock.

Alternative Wording

SA5.1 The person receiving the livestock must make arrangements for separating weak, ill or injured livestock for rest, recovery **and** appropriate treatment **or** humane destruction and disposal of dead stock.

Comment

The standard is clearer with the additions, the animals must be rested and appropriate treatment administered or destroyed, not all of the arrangements listed will be necessary.

SA5.9 Drivers must ensure that the ramp and the vehicle are properly aligned and that any gap between the ramp and the vehicle is sufficiently narrow to avoid causing injury during loading and unloading.

Alternative Wording

SA5.9 Drivers must ensure that the ramp and the vehicle are properly aligned and that any gap between the ramp and the vehicle is sufficiently narrow to **minimise the risk of** injury during loading and unloading.

Comment

Using the term 'minimise' instead of 'avoid' makes the language used throughout the document more consistent.

SA5.15 Where there is a road incident involving the transport vehicle, all livestock must at the first available opportunity be:

- i) assessed, in the standing position if possible,
- ii) removed for treatment,
- iii) humanely destroyed at the accident site.

Alternative Wording

SA5.15 Where there is a road incident involving the transport vehicle, all livestock must at the first available opportunity be:

- i) assessed, in the standing position if possible,
- ii) removed for treatment, **or**
- iii) humanely destroyed at the accident site.

Comment

Humane destruction may not always be the solution if a road accident was to occur. As the standard is currently written all three steps must be taken.

GA5.19 Where there is concern about the assessment of fitness to load, veterinary advice should be sought.

Alternative Wording

~~**GA5.19** Where there is concern about the assessment of fitness to load, veterinary advice should be sought.~~

Comment

This guideline is all ready covered by SA4.2 where any livestock judged as not fit for the intended journey must only be transported under veterinary advice.

GA5.34 During a voluntary spell, in addition to water and space to lie down, livestock should be provided with the following additional provisions:

- access to appropriate food if there is time to eat and rehydrate
- enough space for exercise
- separation appropriate to the travel group.

Alternative Wording

GA5.34 During a voluntary spell, in addition to water and space to lie down, livestock should be provided with the following additional provisions:

- access to appropriate food if **the spell is greater than 12 hours**
- enough space for exercise
- separation appropriate to the travel group.
-

Comment

The guideline contradicts the note on the following page which recommends feed should not be provided during short spells of less than 12 hours.

GA5.47 Effective management of livestock considered not fit for the intended journey should include, but is not restricted to:

- effective containment in a suitable holding area
- rest
- provision of shelter, feed and water
- veterinary treatment
- humane destruction

Alternative Wording

GA5.47 Effective management **options for** livestock considered not fit for the intended journey should include, but **are** not restricted to:

- effective containment in a suitable holding area
- rest
- provision of shelter, feed and water
- veterinary treatment
- humane destruction

Comment

The way the guideline is currently worded implies that all the provisions listed are appropriate for an animal considered not fit for transport. Adding “options for” makes the guideline clearer e.g. humane destruction will not necessarily be the answer for an unfit animal.

PROPOSED AMENDMENTS – 11 Specific Requirements for the Land Transport of Sheep

SB11.2 If sheep over 4 months old have been off water for 48 hours, they must be spelled for 36 hours before starting another journey.

Alternative wording

SB11.2 If sheep over 4 months old have been off water for 48 hours, they must be spelled a **minimum of 24** hours before starting another journey.

Comment

The research undertaken by CSIRO on behalf of MLA (AHW055) does not adequately address this standard. The research indicates that following a 24 hour rest period sheep had recovered most metabolic indicators yet did not test if they could cope with another transport event of up to 48 hours.

WPA supports the spell period in SB11.2 remaining at 24 hours for sheep over 4 months unless further research is done using an additional transport event and the results indicate an opposing view.

It was not until the last hour of SRG6 that representatives from CSIRO raised the issue of extending the spell time following a 48 hour water deprivation period to 36 hours. The research had not been completed, was never made available to SRG members and is an example of very poor process.

SB11.3 Approved methods of humane destruction for:

i) *sheep* are firearms, captive bolt, lethal injection or bleeding out; bleeding out by neck cut must only be done by a competent operator and in situations where there is no firearm or captive bolt available.

ii) *lambs* are firearms, captive bolt lethal injection, bleeding out or blunt trauma; bleeding out by neck cut must be done by a competent operator and in situations where there is no firearm or captive bolt available; blunt trauma must only be used for lambs that are less than 24 hours old and where there is no firearm or captive bolt available.

Alternative Wording

SA5.1 Approved methods of humane destruction for:

i) *sheep* are firearms, captive bolt, lethal injection or bleeding out; bleeding out by neck cut must only be done by a competent operator **or under direct supervision of a competent operator**, in situations where there is no firearm or captive bolt available.

ii) *lambs* are firearms, captive bolt lethal injection, bleeding out or blunt trauma; bleeding out by neck cut must be done by a competent operator **or under direct supervision of a competent operator**, in situations where there is no firearm or captive bolt available; blunt trauma must only be used for lambs that are less than 24 hours old and where there is no firearm or captive bolt available.

Comment

Adding “under direct supervision of a competent operator” aligns the standard with other standards relating to competency. It is a very important addition as there is a point where all operators will not be competent, and to become competent they must be allowed to complete the task under supervision.

AUSTRALIAN STANDARDS AND GUIDELINES FOR THE

WELFARE OF ANIMALS

LAND TRANSPORT OF LIVESTOCK

REGULATORY IMPACT STATEMENT

PUBLIC CONSULTATION SUBMISSION

WOOLPRODUCERS AUSTRALIA

26 MAY 2008

Contact:
Alexandra MacLennan
Level 1, NFF House
14-16 Brisbane Ave
Barton ACT 2600
P 02 6273 2531
E amaclennan@nff.org.au

WoolProducers Australia (WPA) is the peak national body for the wool industry in Australia and represents over 14,000 farmers whose primary business is growing wool. We are the national voice on behalf of producers, advocating their interests to both the Federal Government and internationally.

WPA supports Option B: the proposed standards, we do not support any of the alternative options presented in the RIS. In particular Options E and E1, as outlined in the RIS, “there is no scientific evidence to suggest that the reduction in water deprivation time presented in Options E and E1 would provide higher welfare benefits than options B”.

APPENDIX 8 - UNRESOLVED ISSUES

<i>Time off water</i>	<p>WPA supports the time off water standards and guidelines as presented in the public consultation version of the land transport standards.</p> <p>There are adequate provisions within the standards to minimise the risk to an adverse animal welfare outcome occurring during transport in relation to time off water such as SA5.11.</p> <p>Extra recognition of the potential risk to the welfare of livestock on lengthy journeys is all ready included in the standards and guidelines for example SA1.2 and GB11.1.</p> <p>WPA does not support the inclusion of a standard that outlines contingency arrangements to extend time off water.</p>
<i>Loading density</i>	<p>WPA is of the view that the final responsibility for determining loading density sits with the driver. There have been issues raised of consignors wanting to fit more animals per load to reduce transporting costs, therefore we believe the driver will have a more objective view of loading density than the consignor.</p>
<i>Interpretation of standards and guidelines</i>	<p>WPA supports the definition of a standard and a guideline.</p>
<i>Humane destruction</i>	<p>WPA supports competency standards in relation to humane destruction as they are currently drafted.</p>
<i>Definition of ‘risk to the welfare of livestock’</i>	<p>WPA supports the current definition of ‘risk to the welfare of livestock.’</p>
<i>Definitions of posture stance</i>	<p>Sufficient vertical clearance for livestock to minimise the risk to welfare is adequately covered by SA3.1</p>
<i>Additional issues associated with time off water</i>	<p>We do not support further standards included to mandate the provision of water in saleyards and transit yards.</p> <p>The standards adequately deal with the effective transfer of</p>

	<p>information on water deprivation times.</p> <p>We support the recommended 4 hour minimum for voluntary in-transit spells.</p>
<p><i>Additional issues associated with the handling of livestock</i></p>	<p>WPA does not support the addition of dragging to the standards or guidelines as agreed at SRG 6.</p> <p>We support the current standards relating to prod use.</p> <p>We support the current standards in relation dogs.</p>