

To: Animal Welfare Standards Public Consultation  
PO Box 196  
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RE: Submission to the consultation

## **Submission by Liberation of Brother and Sister Animals (LOBSA) on the draft Animal Welfare Standards for Land Transport of Animals**

### ***Preface***

Liberation Of Brother and Sisters Animals is a group that promotes animal rights. As such, we basically oppose the whole process in which non-human animals are perceived and treated as resources, as tools, or as living foodstuff instead of as sentient beings, possessed of their own wills and goals.

None of our inputs to this draft should be taken as support for animal exploitation in any form. We are making a submission to this because it is our goal to reduce the suffering humans impose on these fellow beings wherever we can and to whatever extent we can. We recognise, with sorrow, that animal industries are not going to stop tomorrow, and so seek to reduce the pain non-human animals must endure before they are killed.

### ***Fundamental Issues***

The most basic issue we see is that the majority of the measures to reduce animal suffering or to increase accountability are not binding in any way. The distinction is made at the outset between ***standards*** and ***guidelines***. The standards are binding ("must" with implications of legal requirement), the guidelines are not. There are almost no standards, most of the measures being non-obligatory guidelines.

Some of the standards, such as SA1.1 and SA 1.2 assign accountability and documentation. Yet these seem to be subsequently undercut by the fact that "*duty of care*" is defined through non-obligatory guidelines. GA1.1 says the various people involved "should" communicate effectively, without actually defining effective communication. As an example, GA1.2(iv), GA1.2(v), and GA1.2(vi) indicate consigners "***should***" follow guidelines, "***should***" communicate, "***should***" keep records, but the fact that these are guidelines, not standards, means that they do not ***need*** to do so. This undermines the standards, rather than supporting them. There is no reason to introduce a sense that these things are discretionary.

Items like record-keeping about watering and feeding should be standards, not

guidelines. In respect of consignor issues: Feed and water provision and other relevant information are not ambiguous, nor subject to interpretation in the way selecting animals for the journey may be. There is no reason keeping such records (vi) and communicating them (v) should not be requirements, since it effects the ability of all subsequent responsible parties to provide adequate care. Items (ii) & (iii), the actual provision of food and water as appropriate, and ensuring holding and loading facilities are well designed and maintained, are likewise items that should be required, not "suggested".

The entire document incorporates similar flaws. Certain things, like record-keeping and passing records on, are fundamental. Reporting standards should be developed, rather than relying on indications that records "should" be kept and communicated.

We basically feel that the issues need to be examined for those which can be made firmly (no sharp protruding fittings inside containers) and those which cannot be absolutely defined (the appearance of weakness in an animal. Those issues that can be firmly defined should be standards. This includes certain physical standards for holding pens, vehicles, loading ramps, etc. It also must include all reporting. There is no excuse not to keep records, or to pass them on. Some issues of animal health are also clearcut. An animal that has trouble walking or standing is clearly unfit for livestock transport. Water deprivation and spelling should always be standards.

Issues that require discretion and judgement may be left as guidelines. However, the principles on which the guidelines are based should be made clear. We believe that if the principle is to reduce suffering, decisions would be made differently than if the principle is simply to effectively transport a non-human animal in the most cost-effective way, balancing the increased economic benefits of a healthy animal against costs of non-transportation. We believe animal welfare should be the primary principle on which decisions are made.

We believe loading density is an issue for accountability and reportage.

Note: we support increased accountability. Record-keeping is fundamental both to assigning responsibility and in order to allow handling at subsequent points to be done in an informed and responsible manner. Since most proposed reporting and communicating guidelines are seen as having minimal cost impacts, there is no reason they should not be made obligatory standards.

## ***Specific Issues***

Of the specific issues, the most dominant ones are, for us, the alterations of water deprivation and spell period standards. In particular, we oppose any reduction in the frequency or length of spell periods, and any increase in the period of water deprivation. Several of the proposals are to force animals to do with less water, and to give them less relief from travel. The rationale for these

is mainly that they are requests from industry, and seem primarily motivated by economics. We oppose forcing thirst on animals, or forcing long, mostly continuous journeys. To do so increases suffering during their lives. Even if they are going to be killed, there is no excuse for increasing the misery of their lives up till that point.

A specific issue relates to "bobby calves". LOBSA does not believe that transportation of 5 day old calves is humane. We note that the RSPCA believes they should be at least 10 days old. We support that as an improvement on the current standards, but believe that even 10 days is too young. We completely oppose attempts to allow transport of calves under 5 days old.

We feel cows pregnant in their last trimester should not be transported any substantial distance.

We definitely oppose increased deprivation of water, and reduction of spell times, for cattle under 30 days of age, and for cows pregnant in their last trimester.

We have similar concerns for transport of other pregnant animals in their last trimester.

Regards,  
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