

Comments on Australian Standards and Guidelines for Land Transport of Livestock

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Part A

Standards 1. Responsibilities and planning

SA1.1 – would be difficult to verify this as criteria are not sufficiently clear

SA1.2 – the nature of the documentation should be clear as well as specifying who is responsible for providing the documentation; emergency contacts needs to be specified – eg agent, person in charge at departure and destination. See GA 1.15 – this should be in the Std as being mandatory

GA1.3 v) add that... appropriate management ... is provided promptly.

vi) if requirements for specified fitness is not met, then this should result in refusal to load ie if owner hasn't done the right thing, then the transporter should be compelled to take action otherwise nothing will change.

GA 1.16 – this should be a standard, as people in charge of animals must be competent

Standards 2. Stock handling competency

This is critical to welfare – perhaps thought should be given to developing a national program for ensuring transporters and handlers are competent.

SA2.1 – fully support this and there must be explicit mandatory competency standards ie national training package

GA2.1 – see above – all these must be musts otherwise there is no framework to determine competency

GA2.2 – this list does not validate competency – only competency based assesment does

Standards 3. Transport vehicles and facilities for livestock

SA3.1 ii) – need to define effective

GA3.4 – the term significantly is vague

GA3.14 – if there is a recommended species std for the slope, then this should be included in the species guidelines and reference made to this in the Part A guidelines

Standards 4. Pre-transport selection of livestock

SA4.1 – major concern regarding ‘within 2 weeks of parturition’. There needs to be substantial evidence that this will not lead to a stress abortion etc. would be best to refer to each species rather than make a blanket statement. Also the term not known to be or visually assessed not to be is totally inadequate for a std as an operator could use this as an excuse.

GA4.5 insert ...destroyed immediately....

GA4.8 2nd para add ...time available in brackets after space

Standards 5. Loading, transporting and unloading livestock

SA5.3 – not sufficiently clear ie must comply with recommended loading densities in Part B

SA5.6 ii) is it necessary for any animal to be lifted by a single leg – what is the problem in requiring that the animal is supported? Also if this is to stay, then recommend that the age is dropped to 1 mth

SA5.7 allowing use of prodders is a major concern as substantial work by Grandin and others shows clearly the aversive effects as well as the major reduction in productivity. I strongly recommend that they not be used at all on sheep, pigs or deer (I believe NZ doesn't allow use on deer). If this cannot be accommodated, then the fall back would be to not allow use on young (ie <6mths of age) of these species. The use of prodders actually increases the risk of injury to both stock and handlers as animals become confused etc. It is a sign of poor stockmanship.

SA 5.14 – need to define what extreme hot or cold is

GA5.9 electric prodders should not be promoted as an aid – gives the wrong impression

GA 5.10 & GA5.11 – shoulds should be musts and made standards

GA5.13 insert after ...livestock should be ‘avoided but if unavoidable’ should be carefully managed....

GA 5.14 – should it state that they shouldn't be taken to saleyards as this is very stressful.

GS 5.16 – major inconsistency here as weak, ill or injured animals should not be loaded at all. Perhaps a permit system similar to quarantined animals should be set up.

Standards 6. Humane destruction

SA6.7 – recommend max of 5kg as 15kg is quite a large size.

Also, competency must be assessed on specifics such as anatomy, restrain, equipment, technique, signs of death etc.

Must only be performed by competency based assessed operators.

GA6.10 reasonable is not very good – would have though which ensures personal safety

GA6.8 – all these should be **musts**

GA6.11 – all these should be **musts**

Part B Species specific requirements

General comments

Time off water – these all seem excessive and is of concern. Have these been verified for all species, otherwise would reduce. Also doesn't take into account hot weather (a common scenario in our environment and especially where long haulage is involved from northern parts of Aust).

Must have auditable records to verify all times comply

With reference to last x weeks pregnancy, this is of concern and even the 4 hr journey could pose problems – this would need to be verified.

Specific

GB2.15 Electric prodders must not to be used on buffalo. Change to a std.

SB4.5 ii) suggest 10 hrs rather than 18

Add electric prodders must not be used on bobby calves or calves less than 6 mths old.

GB4.15 change to 8 hrs rather than 10 hrs

SB5.4 – must not be used

Sheep add to stds, that electric prodders must not be used on lambs < 6mths old.