

PACAT

People Against Cruelty
in Animal Transport



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Dear Sir or Madam

Draft Land Transport Standards

Thank you for allowing us the opportunity to comment on the draft Standards.

People Against Cruelty in Animal Transport (PACAT) is based in Fremantle, Western Australia and represents over 500 community members who are concerned about the welfare of transported animals.

Enclosed is PACAT's submission on the Draft Land Transport Standards.

PACAT's main concern about the draft Standards is that the draft Guidelines are unenforceable. Consequently, the draft Standards rely too heavily on self-regulation.

PACAT's main concerns about current land transport practices are:

1. there is no proper training and accreditation scheme for livestock handlers;
2. drivers are ill-equipped to handle emergencies and quickly euthanise moribund animals;
3. young calves without mothers are not suitable for transport at all; and
4. handling of poultry is generally very poor and poultry containers are regularly overloaded.

I would be pleased to discuss the submission further with you. Please do not hesitate to telephone me.

Thank you for considering my submission.

Kind regards

Heidi Nore

Heidi Nore
PACAT Secretary

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SUBMISSIONS ON DRAFT LAND TRANSPORT STANDARDS

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RESPONSIBILITIES FOR LIVESTOCK TRANSPORT

SA1.2

SA1.2 needs to be strengthened to ensure that there is continuity of care with each change of responsibility.

SA1.2 appears to indicate that livestock could be transported for up to two 24 hour periods without any accompanying documents. The proposed documents must accompany the livestock with every change of responsibility.

I submit that the Standard be amended by removing "reasonably expected to exceed 24 hours" and replaced with:

"reasonably expected to exceed 12 hours".

I submit that the phrase "A person in charge who is transferring responsibility for livestock to be further transported for longer than 24 hours must provide a document with this information to the next person in charge"

be replaced with:

"A person in charge who is transferring responsibility for livestock to be further transported must provide a document with this information to the next person in charge"

And:

"A person in charge has responsibility to ensure that animals are fit, or fit to load, prior to transferring responsibility.

STOCK HANDLING COMPETENCIES

SA2.1

I strongly submit that these Standards include a requirement that all stock handlers be trained in a national training scheme which is specifically established by these Standards.

These Standards must provide for a national training scheme for stock handlers and a national accreditation system. All current and future livestock handlers must be trained and accredited. Without a defined training scheme and accreditation system, these Standards will rely only on self-regulation and will fail.

I submit that SA2.1 be redrafted to include a national training scheme and accreditation system.

The term "competent" is not capable of measurement or quantifiable definition. The notion of "competence" relies on the industries to self-regulate. The purpose of these Standards is to avoid reliance on industry self-regulation. The effectiveness of these Standards is diluted if the skills and knowledge of stock handlers are undefined and unquantifiable.

As they are currently drafted, the Draft Standard allows for an incompetent person to handle livestock provided the incompetent person is supervised. There is no definition of "competent" and there is no definition of what constitutes "supervision".

Many stock handlers will be unaware of the existence of these Draft Standards and therefore unable to comply with them. Many stock handlers have learned on-the-job. On-the-job training entrenches certain practices within industry culture. The entrenchment of certain handling practices has led to the need for external regulation of the industries.

Many drivers, especially drivers of sheep trucks have little or no training in animal handling and are poorly equipped to deal with downer animals or other emergencies. Many drivers have no idea how to humanely kill an animal in an emergency.

TRANSPORT VEHICLES AND FACILITIES FOR LIVESTOCK

SA3.1

SA3.1 is unacceptable because it relies merely on industry self-regulation.

People Against Cruelty in Animal Transport receives regular complaints from members of the public about welfare issues they have witnessed on trucks. The most common complaints include:

- animals' legs or heads protruding from trucks;
- fallen animals unable to stand because of overcrowding;
- animals being transported on very hot days;
- animals having difficulty breathing - ostensibly due to ammonia, poor ventilation, exhaust fumes or stress; and
- animals falling out of trucks;

I submit that the guidelines GA3.1 to 3.15 be included as enforceable Standards and reworded so that each definition is precise.

GA3.4 – The term "significantly pollute" must be reworded so as to define the airflow and air-change requirements. The Standards must deal with the

issue of strong ammonia concentrations on trucks. The strong ammonia concentration, and the apparent distress it causes to sheep, is a very common source of complaints from members of the public.

GA3.6 - Limbs of livestock must not protrude from the crate under any circumstances. The Standards must make it clear that the driver has responsibility to ensure that animals do not protrude from the crate. If the Standards mandate that this is the clear responsibility of the driver, we are more likely to achieve compliance with this Standard.

The Standards must specify appropriate crate design as an enforceable Standard. Appropriate loading densities must be specified and must be enforceable Standards.

GA3.7 - Flooring and surfaces must be designed to maximise grip and minimise slipping and falling. Appropriate flooring surfaces must be mandated in the Standards. As it is currently drafted, GA3.7 suggests that flooring be examined only after livestock have slipped and fallen.

Guidelines GA3.1 to 3.15 must be included as enforceable Standards

PRE-TRANSPORT PREPARATION OF LIVESTOCK

SA 4.1

SA4.1 does not specify which person has the ultimate responsibility to assess fitness for loading.

SA4.1 must be amended to specify that the assessment for fitness to load must be undertaken by a person who has been trained and accredited by a scheme specifically established by these standards.

For example, dehydration, distress and 2 weeks parturition are not easily detected by untrained observers. This is a further reason why all responsible persons handling livestock transport must be properly trained and accredited.

SA4.1(vi)

SA4.1(vi) must be removed and replaced with a new Standard that an animal in the last trimester of pregnancy must not be transported without written authorisation from a veterinarian who has personally assessed the animal and deemed that its welfare, or the welfare of its foetus, is unlikely to be compromised by the transport.

SA4.1(vi)

As it is currently drafted, SA4.1(vi) allows for transport of heavily pregnant animals and removes the onus on consignors to know how pregnant their animals are. Consignors must accept responsibility for knowing the condition of their animals. I submit that SA4.1(vi) be redrafted as follows:

not be within 2 weeks of parturition, unless the water deprivation time and journey is less than 2 hours duration to another property.

SA4.3

SA4.3 must be amended so that the consignor has responsibility for ensuring that animals are fit to load. As they are currently drafted, the Standards do not place responsibility on anyone in particular.

SA4.4

SA4.4 must be amended so that weak, ill or injured livestock are dealt with without delay, not at the “first opportunity”. The necessity for dealing promptly with weak, ill or injured livestock further highlights the need for all drivers and other livestock handlers to be properly trained and accredited.

LOADING, TRANSPORT AND UNLOADING OF LIVESTOCK

SA5.2

SA5.2 must be revised. Weak animals and animals who are in the last trimester of pregnancy, or who have recently given birth, must not be transported at all, except under advice from a veterinarian who has personally examined the animal.

SA5.3

SA5.3 must be revised to state that the overriding criterion for loading density is that there must be sufficient room for each animal to rise unassisted.

People Against Cruelty in Animal Transport routinely receives calls from the public complaining that they have seen trucks so heavily loaded that sheep have their legs and heads sticking out and are unable to move.

I am unsure what the Standards intend by SA5.3(vii) – “the nature of the intended journey”. Animals must be afforded the same protection whether they are destined for the abattoir or elsewhere. Please remove this provision.

SA5.6

SA5.6 must be revised and strengthened. As it is drafted, this Standard sanctions cruelty. It is totally unacceptable lift poultry in the proposed manner and totally unacceptable to lift any animal by one leg.

The methods of handling proposed are inappropriate and further highlight the need for a proper training and accreditation program.

I submit that SA5.6 be amended in the following manner:

- all handlers must use two hands and lift poultry under the body;
- poultry must never be lifted by only the head, neck feathers or a single leg;
- animals must never be lifted by a single leg;
- animals must never be dragged;
- animals must never be punched, kicked or struck.

People Against Cruelty in Animal Transport is particular concerned that these draft Standards show a lack of concern for ‘unpopular’ animals such as poultry. Poultry are hapless animals and are particularly fragile for their size. The draft Standards must be revised to afford them protection.

SA5.7

SA5.7 is unacceptable. Electric prodders must not be used at all.

If electric prodders are to be used, SA5.7(iv) must define what is meant by “excessively”. As it is currently drafted, this Standard is ineffective. Electric prodders must never be used on the face.

SA5.11

SA5.11 must be revised so that poultry are not excluded from the same protections afforded to other animals.

New Standard

People Against Cruelty in Animal Transport has received reports from people who have tried to alert drivers of sheep trucks to problems such as obviously injured animals but the drivers have failed to respond and failed to stop. I submit that the following further standard be included:

The driver must inspect livestock when reasonably requested to do so by any person.

SA5.12

SA5.12 must be amended so that the driver must provide assistance immediately, not at the “first opportunity”. On a long journey, a “first opportunity” may be many hours away.

Drivers must be properly trained and accredited so that they can deal with these sort of emergencies.

SA5.13

SA5.13 must be amended so that the person receiving the livestock must make immediate arrangements for any weak, ill or injured livestock.

HUMANE DESTRUCTION OF LIVESTOCK

It is imperative that all drivers and other persons who work with livestock in the transport industry be properly trained and accredited by a scheme which has been specifically developed to ensure that these Standards are understood and enforced.

All drivers of livestock must be properly trained and accredited so they are able to immediately and humanely kill livestock when necessary.

I strongly submit that drivers be required to carry with them a captive bolt and other appropriate equipment at all times. Otherwise the requirements for humane destruction cannot be carried out in practice and on the road.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF BUFFALO

SB2.1

The time of water provisions are not evidenced based. Further, the term “known to be” pregnant is an imprecise definition and exonerates the

consignor for failing to know the condition of their animals. "Known to be" must be removed.

SB 2.1 must be amended so that:

	Maximum time off water (hours)
Buffalo over 6 months old	24
Buffalo 1-6 months old	12
Lactating buffalo with calves at foot	12
Buffalo more than 7 months pregnant excluding the last 4 weeks	12
Lactating buffalo with calves at foot	

SB2.2

The term "known to be" pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. "Known to be" must be removed. SB2.2 must be amended as follows:

If buffalo over 6 months old have been off water for 24 hours, they must be spelled for 24 hours before starting another journey.

If cows known to be more than 7 months pregnant excluding the last 4 weeks, lactating cows, calves and young buffalo have been off water for 12 hours, they must be spelled for 12 hours before starting another journey.

SB2.3

I do not support the transport of heavily pregnant animals unless the circumstances are exceptional.

The term "known to be" must be removed. I submit the amendment as follows:

Buffalo known in the last 4 weeks of pregnancy must not be transported unless they have been examined by a veterinarian and the journey is less than 4 hours duration.

SB2.4

Electric prodders must not be used on buffalo.

New Standards

I submit the following new standards:

Buffalo under 30 days old must not travel without their mothers.

The navel of calves must be fully healed prior to any transport and their hooves must not be soft.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF CAMELS

SB3.1

The term "known to be" pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. "Known to be" must be removed.

I submit the following amendments;

	Maximum time off water (hours)
Camels over 6 months old	24
Camels more than 9 months pregnant excluding the last 4 weeks and camels with a calf at foot	12

SB3.2

The term “known to be” pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. “Known to be” must be removed.

SB3.3

“Known to be” must be removed.

SB3.4

“Known to be” must be removed. I submit the following amendment:

Camels in the last 4 weeks of pregnancy must not be transported unless they have been examined by a veterinarian and the journey is less than 2 hours.

SB3.6

Electric prodders must not be used on camels.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF CATTLE

SB4.1

The time of water provisions are not evidenced based. They appear to be drafted for the convenience of the industries and with insufficient concern for the welfare of the animals involved.

The term “known to be” pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. “Known to be” must be removed.

SB 4.1 must be amended so that

	Maximum time off water (hours)
Cattle over 6 months old	24
Calves 1-6 months old	6
Lactating cows with calves at foot	12
Calves less than 30 days old but with a healed navel	2
Cattle more than 6 months pregnant excluding the last 4 weeks	12

Calves under 30 days old must not be transported without their mothers.

Calves without a healed navel must not be transported at all.

SB4.2

The term “known to be” pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. “Known to be” must be removed.

SB4.2 must be amended as follows:

If cattle over 6 months old have been off water for 24 hours, they must be spelled for 36 hours before starting another journey.

If cows more than 6 months pregnant excluding the last 4 weeks, lactating cows with calves at foot or calves 1-6 months old have been off water for 12 hours, they must be spelled for 12 hours before starting another journey.

SB4.3

I do not support the transport of heavily pregnant animals unless the circumstances are exceptional.

“Known to be” must be removed. I submit the following amendment:

Cows in the last 4 weeks of pregnancy must not be transported unless they have been examined by a veterinarian and the journey is less than 2 hours.

SB4.4

I do not support the transport of calves less than 30 days old unless they are being transported with their mothers. Transport of newborns without mothers is not acceptable in any circumstances.

The age of 5 days is an imprecise measurement for fitness for transport. Although I do not support the transport of young calves without mothers I submit that SB4.4 be amended so that:

Calves travelling without mothers must not be transported until their navel is fully healed and their hooves are hard.

Calves should be fed a liquid feed immediately prior to loading and must not be transported for longer than 2 hours.

SB4.5

I do not support the transport of calves less than 30 days old unless they are being transported with their mothers. SB4.5 must be amended so that calves are not transported until their navels are fully healed and their hooves are not soft.

I am concerned that GB4.3 appears to allow young calves to be transported very long distances if they are intended for slaughter. It is not acceptable to impose a lower standard of care upon animals intended for slaughter. If the nearest livestock processing establishment is more than 6 hours away, calves must be reared until they are old enough to endure the journey. Calves without a healed navel must not be transported for slaughter at all.

SB4.7

Dogs must not be used on calves under 6 months old.

New Standard

Electric prodders must not be used on cattle.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF DEER

SB5.1

The time of water provisions are not evidenced based.

The term “known to be” pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. “Known to be” must be removed.

SB 5.1 must be amended so that

	Maximum time off water (hours)
Deer over 6 months old	24
Fawns/calves under 6 months old	12
Deer more than 5 months pregnant excluding the last 4 weeks	12

SB5.2

The term “known to be” must be removed. SB5.2 must be amended as follows:

If deer over 6 months old have been off water for 24 hours, they must be spelled for 36 hours before starting another journey.

If fawns have been off water for 12 hours, they must be spelled for 12 hours before starting another journey.

If deer more than 5 months pregnant excluding the last 4 weeks, have been off water for 12 hours, they must be spelled for 12 hours before starting another journey.

SB5.3

The term “known to be” pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. “Known to be” must be removed.

I do not support the transport of heavily pregnant animals unless the circumstances are exceptional.

I submit that the draft Standard be amended to:

Deer in the last 4 weeks of pregnancy must not transported be transported unless they have been physically examined by a veterinarian and the journey is less than 2 hours duration.

SB5.4

Deer are easily frightened. Electric prodders must not used on deer at all.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF GOATS

I am concerned that the Standards fail to reflect that many goats are unaccustomed to human contact. I suggest the following further standard:

Unmanaged goats must be kept in paddocks for at least 4 days, and must be drafted and fed water and hay so that they become accustomed to lot-feeding before transport to a feedlot or depot.

SB7.1

The time of water provisions are not evidenced based. They appear to be drafted for the convenience of the industries and with insufficient concern for the welfare of the animals involved.

The term “known to be” pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. “Known to be” must be removed.

SB 7.1 must be amended so that:

	Maximum time off water (hours)
Goats over 6 months old	24
Kids under 6 months old	12
Goats more than 12 weeks pregnant excluding the last 4 weeks	12
Lactating goats with kids at foot	12

SB7.2

The term “known to be” must be removed.

SB7.2 must be amended as follows:

If goats over 6 months old have been off water for 24 hours, they must be spelled for 36 hours before starting another journey.

If kids have been off water for 12 hours, they must be spelled for 12 hours before starting another journey.

If goats more than 12 weeks pregnant excluding the last 4 weeks, have been off water for 24 hours, they must be spelled for 12 hours before starting another journey.

New Standard

Goats in the last 4 weeks of pregnancy must not transported be transported unless they have been physically examined by a veterinarian and the journey is less than 2 hours duration.

New Standard

Electric prodders must not be used on goats.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF RATITES

I submit the following further Standards:

Ratites must only be picked up by supporting the body.

Ratites must be transported in very dimly lit conditions.

Ratites must only be transported at night.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF PIGS

SB9.2

Pigs are not able to readily deal with heat, cold, wind or bright sun. They must not be transported for longer than 24 hours. SB9.2 must be removed.

New Standard

Pigs must be transported in such a way as to be constant shade and protected from wind.

New Standard

Pink-skinned pigs must only be transported at night.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF POULTRY

I am very concerned about the lower standard of care applied to poultry. Poultry are capable of experiencing pain and suffering to the same degree as the other animals addressed in these Standards.

The Standards do not define what are hot and cold temperatures. Poultry do not cope with temperature changes as well as other animals.

Community members complain to People Against Cruelty in Animal Transport that poultry trucks are immensely overloaded.

I consider that the draft Standards are grossly out of touch with community expectations.

SB10.1

SB10.1 is unacceptable. Neither poultry nor chicks should be deprived of food or water for more than 12 hours.

SB10.2

Poultry, excluding chicks, must not be held in containers for more than 12 hours, unless provided with feed, water and shelter.

SB10.5

SB10.5 does not sufficiently protect the welfare of the animals.

I submit that the Standard be replaced with:

Poultry with a broken leg or poultry that are unable to walk must not be transported and must be immediately and humanely killed.

SB10.6

SB10.6 is unacceptable. It sanctions rough handling and increases the likelihood of injury to the animals.

I submit that the Standard be replaced with:

Poultry must be supported under the body when they are lifted or carried. They must never be lifted or carried by the head, neck, wings, feathers or tail feathers.

SB10.9

Death by 100% CO₂ causes carbonic acid to form in the lungs and is painful. Death by CO₂ is less painful if the gas proportions are 80% CO₂ and 20% O₂.

I submit that the Standard be amended to stipulate that the gas be 80% CO₂ and 20% O₂.

New Standard - Loading Density

The suggested loading densities in the Guidelines are inadequate and encourage cruel practices. The suggested loading densities are at least twice what they ought to be.

I submit the following further Standard:

All birds must be able to comfortably sit on the floor at the same time.

SPECIFIC REQUIREMENTS FOR THE LAND TRANSPORT OF SHEEP

SB11.1

The time of water provisions are not evidenced based. They appear to be drafted for the convenience of the industries and with insufficient concern for the welfare of the animals involved.

The term “known to be” pregnant is an imprecise definition and exonerates the consignor for failing to know the condition of their animals. “Known to be” must be removed.

SB 11.1 must be amended so that:

	Maximum time off water (hours)
Sheep over 6 months old	24
Sheep under 6 months old	12
Sheep more than 12 weeks pregnant excluding the last 4 weeks	12

SB11.2

The term “known to be” must be removed. SB11.2 must be amended as follows:

If sheep over 6 months old have been off water for 24 hours, they must be spelled for 36 hours before starting another journey.

If lambs under 6 months old have been off water for 12 hours, they must be spelled for 12 hours before starting another journey.

If ewes more than 12 weeks pregnant excluding the last 4 weeks, have been off water for 24 hours, they must be spelled for 12 hours before starting another journey.

New Standard

Sheep in the last 4 weeks of pregnancy must not transported be transported unless they have been physically examined by a veterinarian and the journey is less than 2 hours duration.

New Standard

Sheep are easily frightened.

Electric prodders must not be used on sheep.