



CATTLE COUNCIL OF AUSTRALIA

SUBMISSION TO PUBLIC CONSULTATION

AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES FOR THE LAND TRANSPORT OF LIVESTOCK

Cattle Council of Australia

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Background

Cattle Council of Australia Inc (CCA) is the Peak Industry Council representing beef cattle producers. The Council's mission is "Creating an environment for the sustained profitability of Australian beef cattle producers". CCA is a member of the National Farmers' Federation (NFF). The President of CCA chairs NFF's Quarantine and Animal Health and Welfare Committee.

CCA is a member of the Standards Reference Group (SRG) and has attended the six meetings of that Group, the outcome of which is the draft Land Transport Standards and Guidelines.

Cattle producers form one of the largest groups of users of livestock transport in Australia so are vitally interested in the outcome of the public consultation process. The SRG, which is meeting again in July 2008 to finalise the Standards, is also an essential part of this process.

The SRG will then refer the Standards and Guidelines to the Australian Animal Welfare Working Group for endorsements. Any substantial changes flagged by the AWWG must be raised with industry members as, after that stage, the Standards will go to Animal Health Committee, PISC and PIMC where industry loses any chance of further input.

Even after PIMC has endorsed the Standards, their implementation is of concern to CCA as harmonisation in legislation of Standards must be the final outcome. Industry must be part of this decision-making process as CCA has flagged from the beginning that without national harmonisation the whole process of Standards development is unacceptable.

General Issues

CCA has maintained that Guidelines are essential: the Standards being the "musts" and the Guidelines being the "how to" means they go together. Without Guidelines there would have to be more standards to cover some of the issues that currently reside in the Guidelines, e.g., loading densities.

CCA wishes to reiterate that without harmonisation of legislation between all States and Territories the implementation of the Standards nationally would be unacceptable.

CCA sees the development of the Standards as the only means of having uniform legislation across the country so that movement of livestock across State/Territory borders would mean operating under uniform legislation. If harmonisation cannot be achieved CCA has flagged on a number of occasions that we may need a 'Deed' similar to the Exotic Animal Disease Response Agreement.

CCA supports a science-based standards development process. CCA strongly supported maximum water deprivation time of 48 hours for cattle over six months of age as this was the findings of research conducted by the CSIRO. The same research indicated that the spell period after 48 hours off water should be extended from 24 hours to 36 hours and the science was accepted in that instance also.



Specific Issues

Issues that raise questions from producers are:

1. Responsibilities and planning – Page 7 where documents are raised. CCA has been advising our constituency that there are only two documents: the consignor's NVD and the transporter's consignment note.
2. Stock handling competency – Page 13 states that handlers must be competent. CCA advocates that it need not be a required that handlers attend training courses where competency can be demonstrated through experience.
3. Pre-transport selection of livestock – Page 17, Livestock must be assessed refers to pregnant cattle. CCA reiterates that wording "visually assessed" is imperative within this context.
4. Handling, transporting and unloading livestock – Page 21, refers to management of time off water. CCA supported that "predicted" be inserted before "weather conditions".
5. Humane destruction is another component of the standards where experience and not necessarily training is required.

It is documented that there are 16 issues that have not achieved complete agreement.

1. Maximum water deprivation times too long and removal of "extended" provisions. CCA supports 48 hours and extended provisions.
2. Loading density data not in Standards. CCA believes they are an acceptable Guideline, particularly as the transporter has the final approval on loading density.
3. There has been considerable discussion regarding bobby calf standards. CCA considers that this is more a dairy issue.
4. Guidelines only for cold sheep and goats, exemptions to maximum water deprivation times. Not a cattle commodity concern.
5. Interpretation of Standards and Guidelines, specifically the role of Guidelines. CCA believes that Guidelines are an essential part of the document.
6. Humane destruction competency requirement. CCA considers that persons carrying out the destruction must be experienced.
7. Vehicle-operation competency requirement. This is responsibility of the transporter.
8. "Risk to the welfare of livestock" definition inadequate. CCA supports the definition.
9. No definition of 'normal' or 'natural' positions of stance by livestock during transport. CCA considers that the current standards and definitions in the document adequately cover this issue. Furthermore, CCA is of the view that animals will adjust to best travelling position providing there is appropriate loading density.



10. Failure to mandate provision of water in saleyards and transit yards. CCA considers that the requirement of water in yards will be covered under other welfare standards.
11. Failure to mandate pre-transport spelling. CCA considers that the producers cannot be subjected to a mandatory regulation due to curfews, no curfews, etc.
12. Use of four-hour minimum for voluntary pre-transit spells too short for water provision and rest. CCA accepts the four-hour minimum.
13. Loading density final responsibility rests with the driver. CCA reluctantly agreed to this.
14. No standards against dragging of livestock. CCA can accept this as a Guideline.
15. Electric prod use is not restricted well enough. CCA agrees that the current standard is sufficient.
16. Dog use is not restricted well enough. CCA again agrees that the current standard is satisfactory.

The Australian beef cattle industry has an excellent record of outstanding animal-welfare outcomes; the industry prides itself on the care and welfare of its animals. The development of these standards is an excellent opportunity for the livestock industries to achieve harmonisation of legislation in Australia for transport welfare legislation. It is for this reason that we support the development of Standards and Guidelines for the welfare of animals.

David Inall
Executive Director