

To the Animal Welfare Standards Consultation.

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General Comments

An overall concern I have with the proposed new specifications is that the inclusion of suggested "Guidelines" is even considered. Surely a standard of condition of an animals welfare is either correct or incorrect. A specification is either complied with or not, and must be enforceable. Guidelines achieve nothing but words open to interpretation and degrees of latitude which are not enforceable. There must be clear mandatory standards with supporting documentation for the transport operators to use, which shows compliance of the standards on any one journey.

Documentation and Planning

There will need to be paper work to allow proper planning of any journey depending on what animals are being carried. Recorded information re who the driver is, their qualification to do so, departure and arrival points, the times the animals last had food and water, times of inspections during the journey, any problems arising and what actions were taken. The paper work to be retained by the receiver for record purposes to show compliance with the standards.

On any journey the people responsible must produce a documented plan for the journey, including such things as, the location of rest stops and spells, actions to be taken in case of delays, methods to deal with illness and injury, including arrangements for expeditious humane destruction. A list of emergency contacts must be included and drivers must be thoroughly familiar with these plans, and the documentation must be available for inspection by authorities. All transport vehicles must be in good order and a maintenance logbook must be kept with the vehicle and be available for inspection.

Some of the issues and suggestions I feel need to be addressed.

Stock Handling

A program must be available to give training for expertise in handling livestock by experienced people to avoid bad habits and ignorance. Approved training courses to be set up to allow all persons involved to be certified as competent. People involved in handling animals can only undertake transportation tasks if they have a certificate of competence from an approved training course. This certificate may be cancelled if the person breaches standards of animal welfare specifications.

Animals with broken bones must be humanely destroyed without delay, unless veterinary advice recommends other measures. Injured animals must not be dragged off a vehicle. Animals that cannot walk from the vehicle must be destroyed humanely on the vehicle wherever possible. Otherwise they must be humanely lifted off the vehicle for immediate destruction. Electric prodders must not be used on any animal. All dogs must be muzzled while working with livestock. The drivers must take action without delay if any distressed or injured animal is noticed during inspections.

Standards must be written to ensure that all animals are included in specific time off water limits for their type.

Cattle

The major problem for cattle during transport is falling over, which is more likely to happen as cattle get tired during long journeys, with high stocking density, and with rough driving. If they do fall over they get bruised and may be trampled and injured by other cattle, who are then also in danger of falling over. There is some evidence that after 24 hours of feed deprivation and transport cattle become more susceptible to infections, the most well-known being so-called "shipping fever". Dehydration and fatigue, plus decreased immune function with increasing journey time suggest limiting time off food and water to 24 hours before a spell is required.

Calves from 5-30 days old will lie down provided that the surface is comfortable. If they lie down they will be less fatigued and less likely to fall over. Calves must have sufficient space for all of them to lie down and the standards should reflect this.

Calves born earlier than a normal pregnancy (to comply with seasonal calving) must be at an equivalent stage of fitness when transported compared with normal, full-term calves.

Poultry

The problems transporting broiler chickens and spent hens are injuries sustained during catching or pulling from cages, and extreme heat and cold (cold especially for spent hens with poor feathering or all chickens when they get wet). During hot and cold weather the numbers of birds per container, and the number of containers per truck load must be adjusted to minimise thermal stress to birds. If the air temperature throughout the load cannot be maintained between 10 and 30 degC transport must not take place. Have covers that protect birds from wind and rain but still allow natural ventilation. When the temperature is over 30deg C stationary trucks must be in the shade, and both shade and forced ventilation must be provided at slaughterhouses for birds waiting to be unloaded or killed.

Sheep

There needs to be a standard set which allows a maximum of 24 to 36 hours off feed/water for adult sheep. The transportation of sick sheep must be prohibited. Animals fit for transport should be free from conditions that are likely to cause increased pain or distress during transport. Unfit animals must not be loaded and must either be treated or humanely destroyed without delay. (Unless they are being transported short distances for veterinary treatment or better facilities).

Pigs

Of all the animals, pigs are the most sensitive to transport. One reason is that they suffer from motion sickness. They are most likely to vomit if they have eaten within 4 hours of transport. Another reason is that their hairless skin makes them sensitive to heat stress (large pigs), cold stress (small pigs) and sunburn (all). After 24 hours of transport pigs are very tired, hungry and thirsty, so the time off water up to 16 hours would be an acceptable standard. Comfortable flooring must be provided to encourage pigs to lie down if the journey is longer than 8 hours. Heavily pregnant sows must not be transported, unless it is for a short distance to improve the welfare of the sow. If a sow were to farrow during transport, this would certainly have an adverse effect on the welfare of sow and piglets. Similarly lactating sows and piglets must not be transported, unless it is for a short distance to improve their welfare.

In Conclusion

Witnessing livestock transport vehicles driving in all sorts of weather and conditions, and cattle, sheep and pigs with legs protruding or downed animals amongst the load is very distressing. Chickens packed in tightly and obviously in a every which way condition, is not acceptable. The way these animals are treated is inhumane and there is no excuse which justifies the behaviour. I implore you to take this opportunity and ask that the animals are given the greatest consideration.

Yours Faithfully, P E Cornelius