

Dear Sir/Madam,

I wish to provide feedback on the Animals Transport Standard Review. Below please find highlighted several issues that need to be improved for animal welfare to be properly addressed:

- There should be compulsory training and/or accreditation of animal handlers and drivers (currently it only says they must be 'competent' SA 2.1)
- 'Time off water'--this is effectively the time limitation on an animal's total journey times, the Standards permit journeys up to 48 hours for some species (and even longer if a transporter can justify it). This needs to be addressed.
- Transportation of bobby calves (calves under a week old)--issues relate to the age of transport SB 4.1 and, time off food/water SB 4.5 The new Standards still permit bobby calves to be subjected to an arduous day of travel and deprivation of liquid food prior to slaughter.
- Handling issues such as the use of electric prods SA 5.7, – electric prods should be totally banned, and
- Handling 'downer' animals--animals that are ill or injured and are unable to walk may be dragged. Such animals arriving at saleyards or abattoirs should be humanely killed in situ (without being moved at all) SA 5.6. A Guideline (GA5.48) that deals with this issue needs to be tightened and made a Standard (i.e. they should be killed humanely on the vehicle - in all cases).
- Animals that are not fit to load should be excluded from transportation, the measure of fitness should be reviewed, currently pigs with hernia as large as footballs are allowed to be transported.
- The current standards do not provide for the problems pigs encounter if transported in hot weather. Pigs are particularly susceptible to heat stress, yet this issue is only dealt with in the Guidelines (GB9.8) (i.e. optional), when the Standards should ensure proper measures are taken.
- The handling of poultry for transport is currently unacceptable--with 'spent' layer hens being permitted to be carried upside down to the transport carriers with up to 5 held in each hand of the catchers--see GB 10.25. Layer hens taken from battery cages have very fragile bones and studies have shown many will suffer broken bones from such treatment. GB 10.24 similarly allows meat chickens to be carried in this way and they are at risk of hip displacement due to their heavy bodies.
- Minimum space allowances are given through the document, but only as Guidelines. Stocking density is crucially important to prevent crowding (and animals becoming crushed under other animals) and should be enforceable--i.e. be listed as 'Standards'.
- Finally, could you please ensure that Animal Welfare Groups views are reflected in the Final Draft.

Thank You  
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