

I am writing this submission as I am very concerned as to the current practices of livestock transportation and feel strongly that wide scale improvements are required.

Specifically I would like the following issues addressed in the standards and guidelines, that:

- Time off water is reflected in the species-specific Standards as the 'normal time' with exceptions only permitted following additional considerations for longer travel.
- All people in the transport process must be aware – or made aware – of the time that animals have been without water, regardless of the time to be travelled, and take appropriate measures to ensure that the maximum time allowed off water is not exceeded.
- the minimum age at which bobby calves may be transported be increased to 10 days.
- the time interval from farm to abattoir, for bobby calves destined for slaughter, not exceed 10 hours
- all bobby calves, regardless of destination, are transported in vehicles that provide them with thick bedding and room to lie down.
- the Standards must allow for a pre-transport spell period (i.e. water and rest) to be provided to the following categories of animals, where it is in their interest to transport them:
 - livestock that are pregnant
 - livestock that have recently given birth
 - livestock that are lactating
 - livestock with young at foot
 - immature livestock as defined for each species
 - livestock mustered from extensive areas
 - livestock that are unaccustomed to handling
 - livestock that are stressed
 - livestock that are fatigued from mustering or handling
 - weak livestock.
- the loading density tables currently included in the species-specific Guidelines be included in the relevant species' Standards.
- the vertical clearance clause be strengthened so that, if an animal has to stand with its head down, then at least its back or withers do not come into contact with overhead structures.
- this Standard include dragging of animals by one leg and that the exception for sheep, goats and pigs under three months old be removed.
- the use of electric prodders be banned in favour of alternative handling aids such as flappers, rattlers, or canes with flags and other low-stress stock-handling techniques.
- humane destruction be carried out immediately or, if not, at the first opportunity and in the interest of the animal concerned
- all efforts must be made to avoid unnecessary handling of moribund animals that are unable to walk.

Importantly I implore the Federal Minister for Agriculture ensures that his state/territory equivalents push for the draft Standards to be incorporated into nationally consistent legislation within two years of being approved by the Primary Industries Ministerial Council. Thereby ensuring all those involved in the transport process are encouraged to adhere to the minimum requirements set out in the Standards.

I also wish to ask as to whether the RIS has taken the animal welfare benefits and community expectations of Options B1, E and E1 into account sufficiently by the use of weighting in the final analysis, particularly given the difficulty in quantifying such benefits/expectations.

These are issues of importance, and the welfare of animals must be protected to the highest standards possible, irrespective of ultimate destination. Thank you for your consideration of my submission.

Faithfully,

I. Nalato
5/1 Spring Street
Melbourne Victoria 3000