Animal Welfare Standards Public Consultation
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Submission

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I have had forty-two years experience with horses, including working on studs and I now run my own horse stud and transport business.

I would like to comment on the **Australian Standards and Guidelines for the Welfare of Animals, Land Transport of Livestock, Public Consultation Version 29 February 2008**, especially with respect to the transport of horses.

Although I believe that the draft guidelines generally make the necessary specifications for protecting the welfare of livestock on land, I would like to suggest the following improvements with respect to specific sections of the draft:

GB 8.6   It is my experience that horses in body condition less than 2 often *need* to be transported urgently out of the situation which allowed them to reach such a poor state of nutrition in the first place, whether this be through neglect, financial circumstances of the owner, or ignorance. Rather than prevent them from being transported, which could result in continuing neglect, it would be better to establish special conditions under which they can be transported. Therefore I would suggest for the welfare of the animal: transport to be no more than two hours in duration; feed (hay net) and water to be supplied en route, horse to be checked half-hourly en route, transport operator required by law to report in writing, the condition of the animal, the owner's name and address of origin, and the receiver's name and address of origin, to the local animal welfare organisation, vet or DPI, for follow-up of the animal's ongoing nutrition and care. This would give the greatest opportunity for the animal to recover and be looked after.

I suggest that similar requirements could be put in place for other animals.

GB 8.18   Inadequate litter, when wet by animal manure, rapidly becomes slippery and more dangerous than an unlittered, rubberised floor. The use of litter is fine, but if

used, I suggest that minimum levels should be specified for various litter types, for example for horses I would suggest 20 cm for sawdust and 30 cm for straw. Anything less can be easily kicked aside if the horse scrambles or paws during transport. Of course, if litter is used, it should also be taken into account when assessing the internal heights of trailers.

GB8.22　　　　Stallions should be segregated *full stop* – if they start to "behave aggressively" it is often too late to prevent escalation of aggressive behaviour. Stallion fights, or stallion attacks on other livestock, in my experience escalate more rapidly (within seconds) in contrast to fights between other animals, e.g. goats, cattle, etc. They are called "*stall*ions" because a royal decree ordered their confinement to *stalls* in England around the 17th century because they were responsible for more deaths than any other class of domestic animal. An otherwise quiet stallion may become uncharacteristically aggressive when exposed to the stress of transport or unfamiliar livestock, especially geldings or other stallions. I have worked on properties with up to 7 stallions, and although normally quiet and easy to handle in their familiar stall, yard or paddock, with familiar horses and/or people around them, most become quite agitated when their normal routine is disturbed. Every stallion owner knows that they generally hate being moved. All in all, I would not move stallions together without segregation, that is at least without a "stallion divider".

General:　　　A rifle shot is consistently suggested through the draft guidelines as the preferred method of humane destruction? Was it taken into account in drafting the guidelines, that a rifle shot may frighten and panic animals accompanying the horse being destroyed, causing further injury to other animals or handlers?