



## AUSTRALIAN CHICKEN MEAT FEDERATION INC.

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To Whom It May Concern

I am making this submission in my capacity as Deputy Executive Director of the Australian Chicken Meat Federation Inc. The Federation is the peak national industry body representing the interests of the Australian chicken meat industry.

### **Comments on the Standards**

#### ***General***

The Federation feels that the Standards in general cover the important and necessary issues of concern with respect to the land transport of meat chickens and meat breeder chickens. Furthermore, the Federation agrees that the specifications (and guidelines) established in the Standards do provide the necessary specifications for protecting the welfare of these categories of poultry during transportation and, if uniformly implemented across Australia and uniformly adopted across all of industry, will provide for a good outcome to be achieved with respect to welfare of these categories of poultry during transportation. While the Federation does not necessarily agree that all standards and guidelines contained in the document are necessary (or optimally worded) to achieve the latter objective, it also recognises that the standards reflect a consensus position reached between a range of different parties with sometimes differing views, and on this basis accepts the LTS as presented.

There are several comments that the Federation would like to make however.

With respect to the issue of the interpretation of the standards and guidelines, during the development of the standards and ACMF's participation in that process it was always the Federation's belief that the guidelines were not meant to be and **should not provide** compliance specifications for the standards. The guidelines were to provide guidance only. While it is recognised that some more general non-prescriptive standards have been included in the Standards, the Federation believes that these nevertheless important elements which should not be deleted simply because they are difficult to verify.

#### ***Responsibilities for Livestock Transport***

Because the structure of the chicken meat industry is somewhat unique (eg the owners of the farms where chickens are grown are not usually the owners of the birds themselves; the use of contract pick-up crews to load birds into crates; the fact that the drivers of the trucks used in transport have no role in actually loading the birds into their containers), yet the responsibilities were established to broadly encapsulate all livestock, the general definitions of who has responsibility for the welfare of the animals at different points in the transportation process lacks some clarity for this sector. For example, the very broad definition of who might constitute a 'consignor', which could include the

owner of the birds, his agent (eg the contract grower) or the contract pick-up crew, leaves it a little unclear with respect to who has primary responsibility at any particular point in the transport process (eg SA1.1; G1.2; G1.3). Greater clarity would have been possible if responsibilities had been set out in the poultry specific chapter, rather than in the general standards.

Nevertheless, while the way the standards for responsibilities and planning are presented is not optimal for the chicken meat sector, it is probably manageable.

Regarding the issue of time off water, the Federation believes that 24 hours is an appropriate time for poultry (allowing for contingencies), even though in the vast the majority of cases time off water will be well inside this period.

### ***Stock Handling Competencies***

No significant comments.

### ***Transport Vehicles and Facilities***

GA3.1 A minor issue, but while we agree that there should be a cleaning program for livestock crates and containers, this program does not necessarily need to be between each journey.

### ***Pre-transport Preparation***

With respect to the issue of who should have final responsibility for determining the loading density, while the owner should give clear guidelines as to the loading density, the ultimate decision needs to reside with the pick-up crew (probably more specifically, the supervisor of the pick-up crew) who is there on the farm on the day.

### ***Loading, Transport and Unloading***

With respect to the issue of ‘dragging’, while it may be undesirable in many circumstances and for many classes of livestock to drag animals, the Federation also believes that the definition of what constitutes dragging and when it is may be a welfare concern in various classes of livestock is challenging. Furthermore, the federation believes that the general standard SA5.6 is adequate to protect livestock for inappropriate handling, including ‘dragging’.

### ***Humane Destruction***

With respect to the unresolved issue of competencies for humane destruction and guidelines for transport operators, the Federation’s view is that this competency is not necessary because it would simply not be possible or practical for a transport operator (driver) to humanely destroy loaded poultry during transportation. In the case of a small number of birds in the load being identified as needing to be humanely destroyed, it would not be physically possible for the driver to unload the containers in order to humanely destroy the affected birds (and to stop and attempt to do so would put the entire load at risk). In the case of a large-scale emergency (eg a truck roll-over) a single truck driver could not handle this task alone anyway. Companies operating in the chicken meat industry have procedures in place to respond to such emergency situations which potentially require large numbers of birds to be humanely destroyed.

### ***B10 Specific Standards for the Land Transport of Poultry***

The Federation believes that the standards and guidelines in this chapter are largely appropriate and manageable.

SB10.1: The notes to the maximum time off water provision for chicks are a little confusing. Perhaps note (b) should read (b) Water deprivation time can be 72 hours **following take-off** if provided with hydrating material in the container.

The Federation believes SB10.8 is not necessary, as electric prodders are not used in poultry. However, if it is more broadly felt that a reference to electric prodders needs to be made in the poultry chapter for 'completeness' (because it is referred to in other species chapters) then the Federation is prepared to accept its inclusion in this Standard.

### **Comments on the RIS**

The Federation has no significant comments to make on the RIS. It feels that the costs attributed to changes associated with the new LTS, at least in terms of the chicken meat industry, have been reasonably represented.

Thank you for the opportunity to comment on these documents.

Regards,

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