

**DRAFT AUSTRALIAN ANIMAL WELFARE
STANDARDS
LAND TRANSPORT OF LIVESTOCK**

Submission by

**Against Animal Cruelty Tasmania Inc.
(AACT)**

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Against Animal Cruelty Tasmania
PO Box 1045, Sandy Bay, TAS 7006
P: (03) 6234 6229 M: 0408 970 359
E: info@AACT.org.au
www.aact.org.au

1. Background

Against Animal Cruelty Tasmania Inc. (AACT) is a not-for-profit Tasmanian animal advocacy group formed in 2003. AACT's overall aim is to eliminate all exploitation, cruelty and suffering of animals within our state and beyond. We strive to facilitate change through non-violent action, education and political lobbying on a wide variety of issues.

2. Summary of Key Areas of Concern

1. The specifications in the Standards for the maximum time that animals are permitted to be deprived of water are too long for all species and must be halved (Chapter B in Standards). In addition, the standard does not provide animals involved in multi-stage journeys with adequate protection in which each journey is less than 24hrs. Also of particular concern is that sales yards or other holding facilities may not provide animals with access to water.

2. The draft Standards and Guidelines allows for bobby calves to be transported at 5 days of age. This needs to be increased to a minimum of 10 days old. The maximum time interval for bobby calves traveling from farm to abattoir should not exceed 6 hours. In addition, during transport, all bobby calves, regardless of their destination, must be provided with thick bedding and room to lie down.

3. The relevant species Standards must include the density tables currently listed in the species-specific Guidelines and that clause SA3.1v be strengthened to ensure that animals are not at risk of injury from overhead structures.

4. The draft Standards and Guidelines does not sufficiently address the needs of certain categories of animals that are at an increased risk during transportation, particularly over long periods of time, in relation to rest or 'spell' prior to transport. These animals include: animals that are pregnant; animals that have recently given birth; animals that are lactating or with young at foot; livestock unaccustomed to handling; livestock that are stressed and fatigued prior to transport; immature livestock and weak livestock.

5. The dragging and / or lifting of any animal, regardless of age, is unacceptable. Standard SA5.6ii must be changed to forbid the dragging / lifting of any animal by one leg. The use of cattle prods must be banned and replaced by low-stress stock handling methods.

3. Introduction

Against Animal Cruelty Tasmania welcomes the opportunity to be able to comment on the Draft Australian Animal Welfare Standards Land Transport or Livestock.

AACT believes that the welfare of an animal is directly related to the ability of the animal to cope with its environment both mentally and physically. AACT is particularly concerned about the welfare of farm animals before, during and after transport.

Transport is a stressful experience for farm animals as it involves water and food deprivation, handling, social disruption, and in many instances, injury. Animals in transport may also be exposed to extreme weather conditions and humidity. In addition, animals in transport are forced to mix with unfamiliar animals in close confinement.

Farm animals from remote areas of Australia are likely to be unused to human contact or handling. Animals may come from large pastoral properties covering thousands of kilometers or they may be wild animals that are harvested, such as feral pigs, camels, buffalo and horses. The mustering of these animals is extremely stressful to the animal as it may involve the use of ground vehicles, helicopters or light aircraft. These animals have had no prior experience of being handled by humans, of confinement or transport. The welfare of these animals is of serious concern.

4. Response to Appendix 8 – Unresolved Issues

Time off water

The deprivation of water before, during and after transport has physiological consequences and affects the welfare of an animal. Modern farm animals are accustomed to having constant access to food and water or feeding and drinking at regular intervals. Animals in transport are at a risk of becoming dehydrated due to stress, prevailing temperature and the length of the journey. Rest stops during the journey may alleviate this, but only if the length of the stop ensures that all animals have the opportunity to drink sufficient amounts of water.

AACT believes that the specifications in the Standards for the maximum time that animals are permitted to be deprived of water is too long for all species and should be halved (Chapter B in Standards).

SA1.2 States that for journeys exceeding 24hrs, animals must have accompanying documentation that states the date and time that the animals last had access to water.

AACT is concerned that this standard does not provide animals involved in multi-stage journeys with adequate protection in which each journey is less than 24hrs. Also of particular concern is that sales yards or other holding facilities may not provide animals with access to water.

AACT believes that all individuals involved in the transport process must be made aware of the time that animals have been without water regardless of the time to be traveled. In addition, appropriate measures must be taken to ensure that the maximum time allowed off water is not exceeded.

Transport of bobby calves

AACT is particularly concerned about the welfare of bobby calves in transport. Bobby calves are at a greater risk of injury during transportation due to their age and size.

SB4.4 and SB4.5 of the draft Standards and Guidelines permits bobby calves to be transported at the age of 5 days old. Bobby calves should not be transported until they are old enough to withstand the stress and strain associated with transportation. The minimum age at which bobby calves are allowed to be transported needs to be increased to 10 days of age. In addition, all bobby calves, regardless of their final destination, must be provided with thick bedding and adequate room to lie down during the journey.

SB4.5 of the draft Standards and Guidelines allows bobby calves to go for a maximum of 18 hours without feed. This is an unacceptable length of time and must be reduced to a maximum of 6hrs.

Sections SB4.4 and SB4.5 lack any Standards for assessing and monitoring bobby calf welfare before welfare problems become apparent. It is essential that the health and welfare of bobby calves be continuously monitored to ensure that calves are fit enough to travel. In addition, reliable methods for proving the age of a bobby calf must be included in the standards.

The same considerations given to higher-value calves (those sold to rearing facilities) need to be given to bobby calves destined for slaughter. Therefore, the maximum transport time permitted for any bobby calf should not exceed 6 hours.

Specifications for loading density of livestock

Whilst AACT is pleased to see that the Standards (SA5.3) take into account a number of important factors in relation to loading density, the Standards need to ensure that pens or crates are not overloaded. Therefore, it is suggested that the loading density tables included in the species-specific Guidelines of the current draft be included in the relevant species' Standards.

Of further concern is the issue of vertical clearance for livestock to minimise the risk of injury (SA3.1v). The draft Standards and Guidelines does not provide adequate assurance that animals will be able to stand in a natural position without the risk of injury from overhead structures. AACT recommends that this clause be strengthened to ensure that animals do not come into contact with overhead structures.

Rest (spell) prior to transport

In the current draft Standards and Guidelines, feed, water and rest considerations are included as guidelines and do not take into account the specific needs of animals that are at an increased risk during transport, particularly over long distances. The Standards must include rest periods and extra consideration to be given for the following categories of animals: animals that are pregnant; animals that have recently given birth; animals that are lactating or with young at foot; livestock unaccustomed to handling; livestock that are stressed and fatigued prior to transport; immature livestock and weak livestock.

Issues associated with animal handling

The draft Standards and Guidelines (SA5.6ii) state that it is acceptable to lift / drag poultry, sheep, goats and pigs if they are less than three months old. AACT strongly believes that it is unacceptable to lift or drag any animal by one leg, regardless of age. Therefore, this Standard should be removed.

AACT also finds the use of electric cattle prods on any animal unacceptable. The use of electric cattle prods must be banned. Alternative handling aids such as rattles, flappers and flags should be used instead, along with other low-stress handling techniques.