

Katie Otto
3/549 Milton Road
Toowong QLD 4066

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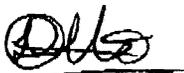
Dear Sir/Madam,

Please find following my Submission of Comment for the proposed Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock.

Due to unforeseeable problems with internet connection, I am unfortunately unable to email this document, and hence am faxing a copy in order to have my submission received by the closing date.

I will follow this fax with a mailed original.

Regards,

A handwritten signature in black ink, appearing to read 'Katie Otto', written over a horizontal line.

Katie Otto

***Australian Standards and Guidelines for the Welfare of Animals –
Land Transport of Livestock***

Submission of Comment

Dear Sir/Madam,

I am writing in response to the Department of Agriculture, Fisheries and Forestry seeking submissions of comment for the proposed Land Transport Standards.

I wish to begin by highlighting specific points where I feel the Guidelines and Standards are inappropriate.

Firstly, Guideline GA2.2 states that supporting evidence of competency should include records of training, training registers, supervisor sign-off sheets, and relevant records of experience.

Many primary producers have spent their lifetime on the land, breeding, raising and handling their stock. However, this practical experience does not fit into any of the criteria currently covered by this Guideline, and hence there are no 'relevant records of experience' to demonstrate the hands-on experience learned over a lifetime in the industry. As such, it is possible for a grazier who has bred and managed livestock for decades to be deemed not 'competent' to handle or load his own cattle, according to the proposed Guideline.

Furthermore, Standard SA2.1 suggests that drivers responsible for transporting cattle should carry original documents demonstrating their 'competency' (e.g. training sheets) at all times, and that these should be viewed by the consignor prior to loading.

In regards to the loading of animals, SA5.4 states that drivers have the final decision on the loading density. Therefore, the consignor is forced to defer to the decision of the driver, regardless of whether this satisfies the Guidelines or the consignor's assessment in the best interests of the livestock.

In terms of loading density, SA5.3 lists seven aspects that must be considered when deciding load density for the journey (e.g. hair length, horn status). Similarly, GA5.4 also refers to the loading density of livestock, stating that they should not be loaded either 'too loosely or too tightly'. Having the loading density dependent on so many factors makes it a very subjective process (i.e. a decision is reached through personal opinion and assessment).

The very fact that SA5.3 and GA5.4 allow so greatly for subjectivity in assessing loading density to best satisfy the welfare of livestock clearly demonstrates the lack of logic in attempting to set such a Standard at all.

Clearly, SA5.3 and GA5.4 are essentially stating that consignors and transporters should demonstrate common-sense in deciding the loading density of stock. Thankfully, such common-sense has been consistently practiced in the primary industry prior to the introduction of such unnecessary recommendations.

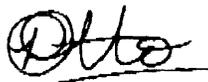
As such, the introduction of Standards and Guidelines that recommend the use of common-sense is not only pointless - as this is inherently subjective - but also obsolete, and an insult to the management and skill of those of us who actually work and live in the primary industry. Producers and drivers are generally very experienced in livestock, given that this is their livelihood, and producers desire to obtain maximum profit from healthy and undamaged/unstressed stock.

Many of the Standards and Guidelines suggested are simply an insult to the intelligence of those people who have spent their lifetime and livelihoods on the land. For one instance, GA5.12 states that 'dogs should be provided with water and rest after working' - a ridiculously superfluous and insulting statement. Similarly ridiculous examples include GA5.5 ('excessive yelling and noise-making should be avoided'), GA5.6 ('handlers should ensure that items that may cause livestock to balk do not impede loading') and SA5.9 ('drivers must ensure that the ramp and vehicle are properly aligned'). Finally, I was deeply affronted by SA5.6 (iv) which states that livestock may not be punched, kicked or struck by instruments such as metal piping, sticks or belts. Not only is this Standard redundant, but also indescribably offensive, both personally and to the industry as a whole.

I would like to take this opportunity to advise the Department of Agriculture, Fisheries and Forestry of the fact that primary producers are those with the greatest knowledge, concern and compassion for the welfare of their livestock - not only because relaxed, healthy, uninjured animals return the greatest profit margin, but also because the entire livelihood of the producer revolves around their stock.

As such, I would like to conclude by reiterating my opinion that I do not believe the welfare of livestock during land transport will be protected *over and above what is currently in practice* with the introduction of these unnecessary Standards and Guidelines, given that these common-sense measures are already employed by those who have the greatest interest in livestock welfare.

Thank you for accepting my submission, and should it be necessary, I look forward to reading a more logical version of the proposed Standards and Guidelines for Land Transport of Livestock.



Katie Otto