

27 May 2008

Animal Welfare Standards Public Consultation
P.O. Box 196
DICKSON, ACT 2602

consultation@animalwelfarestandards.net.au

Dear Madam/Sir,

Please find with this correspondence Comment by Compassion in World Farming (Oceania) on the proposed Australian Standards and Guidelines for the Welfare of Animals – Land Transport of Livestock.

Our comments are not exhaustive, but rather focus on a number of the ‘unresolved issues’ outlined in the Regulatory Impact Statement.

Please contact the undersigned if additional information is sought, on any issue, or queries arise. For example, we would be pleased to contribute to further discussion on crucial issues of space allowance (stocking densities) and time off water. Time has now allowed for more detailed information to be provided in this submission.

Thank you for the opportunity to comment on this important document. While we consider improvements to effect better animal welfare can be made to both Standards and Guidelines, we welcome the initiative to make such requirements (Standards) enforceable.

Yours faithfully,



Carole de Fraga
Regional Representative

Copy: John Callaghan, Director of Programmes, Compassion in World Farming, Godalming (UK)

Primary Industries Ministerial Council

AUSTRALIAN STANDARDS AND GUIDELINES FOR THE WELFARE OF ANIMALS

Land Transport of Livestock

Regulatory Impact Statement – (Abridged)

March 2008

COMMENTS

Compassion in World Farming
PO Box 197 Camberwell, Vic 3125

May 2008

We are requested to nominate our preferred ‘option’ from those assessed in terms of Standards costs and benefits and listed on pages ix and x of the abridged RIS document.

We are unable to do so in relation to Options A, B, B1, C or D, as our preferred option would be one that allows for a minimum of ten days before Bobby calves are moved from their property of birth for slaughter (i.e. a ‘B2’). This option is not provided. We expect that additional costs would be incurred. However, we also point out that additional gains would be made, as calves would carry more weight, and should be more robust and healthy than at five days of age, thus of more value and giving producers better returns.

In a different context, we favour:

Option E1, which allows more effective Standards for livestock welfare, including higher standards related to time off water for particular species/class of species and a minimum voluntary spell of 12 hours.

In selecting this Option, we anticipate it would bring effective reductions to current maximum times off water for most species, which are excessive, as well as addressing other shortcomings within the Standards and identified within our response to the main Standards document..

The good health and welfare of sentient animals are valuable qualities in their own right that will enhance the returns of those who earn from them.

**AUSTRALIAN STANDARDS AND GUIDELINES
FOR THE WELFARE OF ANIMALS**

Land Transport of Livestock

COMMENTS

Compassion in World Farming
PO Box 197 Camberwell, Vic 3125

May 2008

General

Note: Compassion in World Farming is termed ‘Compassion’ throughout this document

Comments

Part A General Standards and Guidelines for the Transport of Livestock

2 Stock handling competency

SA2.1 A person involved in handling, selection, loading, transporting and unloading livestock must be competent to perform their required task, or must be supervised by a competent person.

Proven training and/or accreditation/certification should be the minimum requirement for persons handling animals at any stage of the transportation process, including road drivers and attendants, with ongoing review of the persons’ competence and performance and provision for certificate withdrawal if standards are not maintained or an applicable offence is recorded.

The training of drivers and animal attendance is the subject of ANNEX IV of the European Union EU Council Regulation 1/2005.¹ This requirement is part of the law of EU member states, whose road drivers and attendants must have a certificate of competence issued by the relevant competent authority (i.e. of the respective EU Member State), having passed an examination approved by the competent authority.

The training courses are comprehensive, covering knowledge of relevant (animal welfare) legislation and in particular:

- a) General conditions for the transport of animals and associated documentation, comprehensive and detailed knowledge (specified in the Regulation: listed in Annexes I and II) of various aspects of animal transportation including technical;
- b) animal physiology and in particular drinking and feeding needs, animal behavior and the concept of stress;
- c) practical aspects of handling of animals;
- d) impact of driving behavior on the welfare of the transported animals (and on the quality of meat);
- e) emergency care for animals;
- f) safety considerations for personnel handling animals.

Supporting this EU legislative requirement the SCAHAW considers education of those responsible for animals to be essential and a legal requirement for a certificate to be issued after successful completion of an approved course a valuable way of ensuring that people who have large numbers of animals in their care know how to identify and prevent poor welfare in those animals. The driving standard for vehicles containing animals should be much better than those for human passengers who are seated or are otherwise able to support themselves and maintain balance. To ensure awareness of these phenomena, formal training should apply to those who already have experience in driving such vehicles. There should be the provision to withdraw certification from those unable to maintain standards.ⁱⁱ

SCAHAW Recommendation 10: No person should be allowed to be responsible for assessing that animals are fit for transport, loading animals on to a transport vehicle, driving a road transport vehicle that is carrying livestock, checking that animals on a transport vehicle are fit to continue, or unloading animals from the vehicle, unless that person has received proper training and holds a certificate stating this. The training of livestock vehicle drivers should emphasise that when vehicles carrying livestock go around corners or bends, the animals are far more vulnerable to the effects of vehicle movement than are human passengers (seated or holding on). Hence slow speeds and careful driving are important. The need for careful braking and acceleration should be emphasized.

Compassion agrees with this Recommendation and proposes that Australian Standards adopt the need for formal comprehensive training and accreditation or certification of transport drivers and animal handlers.

This point covers the item 3, p.27 of the RIS – unsettled issues. We consider that a formal list of necessary competencies should be prepared and drivers accredited for all. Overlap is safer than insufficient competence, as may otherwise occur in a variable number of cases.

SA4 Pre-transport selection of livestock

Compassion supports the requirements of the EU Transport Regulation 1/2005 (Annex 1), which clearly prohibits the transport of unfit animals. Para 2 of Annex 1 states that "Animals that are injured or that present physiological weaknesses or pathological processes shall not be considered fit for transport and in particular if:

- (a) they are unable to move independently without pain or to walk unassisted;"

More specifically:

SA 4.1 (v) Compassion considers that an animal must have sight in both eyes before loading. An animal with sight in only one eye is at a disadvantage from the outset. S/he will be disadvantaged when manoeuvring loading/unloading, going up/down ramps and in the midst of the movement of surrounding animals and likely to suffer more mental trauma as a consequence (and possibly physical). Animals suffer injury during the journey and if one remaining eye is injured the animal is likely to be completely blind. Animals that are not fully fit should not be loaded.

SA5 Loading, transporting and unloading livestock

Insert additional requirement:

The issue of emergency humane destruction, of animals injured/unable to walk without pain or distress, *in situ* must be dealt with. Currently this appears weakly as a Guideline, i.e. GA5.48, which suggests that animals so ill-disposed may be unloaded by mechanical means or by a small army of personnel. This would cause the animal(s) extreme and additional pain and distress and it is inconceivable that this could be permitted. **There must be an additional point or sub-point in Standard 5 to ensure that animals that are injured and unable to walk, or unable to walk without pain and distress are humanely destroyed on the vehicle, *in situ*.** Cross-reference to an additional Standard in 6 Humane Destruction if this would increase the surety of injured, i.e. “downer” animals not being moved before euthanasia.

Insert additional requirement:

- SA5.6 iii) livestock must not be thrown or dropped
- iv) **livestock must not be dragged**
- v) livestock must not be punched, kicked *etc.*

Amend requirement to

SA5.7 **Electric prodders must not be used**

This Standard provides for easy mis-use of the electric prodder and is lax. Compassion maintains that means other than the electric prodder should be used to move animals. Training should provide drivers/handlers with the ability to move animals without resorting to the use of electric prodders. Many other means are available, and listed in the OIE Land Transport Guidelines (see reference under), such as panels, flags, plastic paddles, flappers etc., “used in a manner sufficient to encourage and direct movement of the animals without causing undue stress” (as is suggested in the Australian Draft Guideline GA5.11) .

SCAHAW (p.10) finds as follows: ... Heart rate can decrease when animals are frightened but in most farm animal studies, tachycardia, an increase in heart rate has been found to be associated with disturbing

situations. Van Putten and Elshof (1978) found that the heart rate of pigs increased by a factor of 1.5 when an electric goad was used on them ...

p.36: Electric goads can cause severe fear and pain and their use is associated with poor meat quality in pigs and other species.

SCAHAW Recommendation 20: ... the use of electric goads should not be permitted.

EC Regulation 1/2005 Article 35 Amendment to Directive 93/119/EC ... 3. Animals must be moved with care. ... instruments intended for guiding animals must be used solely for that purpose, and only for short periods. The use of instruments which administer electric shocks shall be avoided as far as possible. ... these instruments shall only be used for adult bovine animals and adult pigs which refuse to move, and only when they have room ahead of them in which to move. Shocks shall last no longer than one second, be adequately spaced, and shall only be applied to the muscles of the hindquarters. Shocks shall not be used repeatedly if the animal fails to respond. (Annex I TECHNICAL RULES Chapter III, Transport Practices, 1. Loading, unloading and handling 1.9)

OIE Land Transport Standardsⁱⁱⁱ

Article 3.7.3.8 Loading

Goads and other aids

- a) ... Electric goads and prods should only be used in extreme cases and not on a routine basis to move animals. The use and the power output should be restricted to that necessary to assist movement of an animal and only when an animal has a clear path ahead to move. Goads and other aids should not be used repeatedly ...
- b) The use of such devices should be limited to battery-powered goads on the hindquarters of pigs and large ruminants, and never on sensitive areas such Such instruments should not be used on horses, sheep and goats of any age, or on calves or piglets.

SA5.13 Add time requirement, e.g. The person receiving the livestock must make **prompt (or immediate)** arrangements for separating weak, ill or injured livestock for rest and recovery, appropriate treatment, humane destruction and disposal of dead stock.

SA5.14 Again, we consider there must be a time requirement for this action, to ensure that no delay occurs.

GA5.10/11 Electric prodders should not be used. As an absolute minimum, they should be to the requirements of OIE Guidelines and EU Regulation 1/2005 (see above).

SA6 Humane destruction

Possibly cross reference humane destruction of “downer” animals *in situ* i.e. on the vehicle in Section 6 to ensure that this occurs (we have suggested this be inserted in Standard 5)..

Part B Species Standards and Guidelines for the Transport of Livestock

SB2 Buffalo

SB2.4 Electric prodders must not be used (this position is justified by **GB2.15** qualification, which states that buffalo may become aggressive if so treated).

SB3 Camels

SB3.6 Electric prodders must not be used

SB3.5 We note that discussion regarding ‘normal’ and ‘natural’ positions for head carriage have been discussed and that this Standard has been decided taking that into account. However, we question whether 100mm additional space will permit camels to stand normally, which we believe should be permitted. We also question how this is determined if a number of camels of differing height are being carried. The optimum space must relate to the tallest camel.

GB3.12 “If camels are to be tied up, they should be released and allowed to stand at least every four hours.”

The wording indicates that camels are tied in a way which restricts their movement to the extent that they may not stand (and if this is so, **GB3.12** and **GB3.12** should be transposed, as the reasoning for them being so tied is given). This appears inhumane. If they are so tied for safety reasons, there should be an upper limit as to how long they may remain so, e.g. no more than 2 x 4hr periods with a specified length of respite e.g. 30 mins interim.

GB 3.14 Electric prodders should not be used.

SB4 Cattle Standards

SB4.1 Time off water

Compassion considers the proposed time off water to be excessive, i.e. 48 hours for cattle over 6 months of age. The European Union (EU) Scientific Committee on Animal Health and Welfare (SCAHAW) (2002) reports that the majority of authors who have undertaken experiments investigating the effect of journey length state that the animals experience an increasing negative effect as the journey lengthens and cattle become more fatigued. Contributing factors to the general negative effect are food and water deprivation. The SCAHAW also refers to the effect of high temperatures in transport vehicles often causing poor welfare, which is exacerbated if combined with high humidity. Given the considerable climatic variation and extremes in Australia, off water times should at the very least be tempered by temperature/humidity.

EU Regulations refer to the requirements of ‘control posts’ where rest/recuperation of animals may take place. Australia claims that lengthy animal transportation is unavoidable and has made little (or no) provision for the recuperation of animals *en route*. However, animals travel the length and breadth of

Europe, which by comparison with Australia, is 49.7% of the EU (see <http://www.ga.gov.au/education/facts/dimensions/compare.htm>) and must, by Regulation, receive the benefit of ‘control posts’ for recuperative purposes. Australia should also provide such provisions on longer road routes. Compassion suggests that the major routes travelled for longer distances in Australia would be relatively few, and ‘control posts’, as required, feasible.

The RSPCA reports that journeys exceeding maximum food and water deprivation times are a consistent cause of welfare problems, particularly when State/Territory borders are crossed.^{iv}

SB 4.1 and SB4.5

Bobby calves are widely acknowledged to be very vulnerable animals. Even the RIS states (p.11): *Bobby calves are physiologically immature with no fat reserves, poorly developed thermoregulatory mechanisms and a lack of responsiveness to external stimuli. These factors predispose them to difficulties in coping with transport and handling.*

Yet the Standards do not protect them. More than five days of age, they may travel for 18 hours without their mothers and without the comfort of bedding and nourishment of food and/or water..

(European Commission) EC Regulation 1/2005 Annex 1 Chap 1 FITNESS FOR TRANSPORT 2.(e) calves of less than ten days of age may not be transported more than 100km.

EC Regulation 1/2005 Annex 1 Chap V WATERING AND FEEDING INTERVAL, JOURNEY TIMES AND RESTING PERIOD 1.1.4 (a) (Unweaned) calves which are still on a milk diet may ...be transported for no longer than nine hours before there must be a rest period of at least one hour during which liquid and feed if necessary should be offered. They may then be transported for up to a further 9 hours. ...

Compassion considers this requirement inadequate for the good welfare of calves. However, it acknowledges to a greater extent than proposed Australian Standards the vulnerability of these young animals. The EU stipulates that a calf must be at least 14 days of age in order to travel longer than 8 hours.

We also point out the superior conditions required for calves up to the age of six months:

EC Regulation 1/2005 Chap II MEANS OF TRANSPORT

1. Provision for all means of transport

1.5 ... calves of less than six months of age shall be provided with appropriate bedding material ... which guarantees their comfort appropriate to the species, the number of animals being transported, the journey time, and the weather. This material has to ensure adequate absorption of urine and faeces.

Compassion reports in a publication soon to be released: A review of the literature by **Weeks (2007)** concludes “Scientific evidence indicates that young calves are not well adapted to cope with transport. Their immune systems are not fully developed and they are not able to control their body temperature well, thus

they are susceptible to both heat and cold stress. Weight loss following transit is indicative of exposure to a variety of stressors and is greater for longer journeys or greater stress, including cold or heat stress and exposure to vibration and acceleration. Therefore transport should be avoided where possible particularly as morbidity and mortality following transport can be high.”^v

SCAHAW (2002) recommend that journeys exceeding 8 hours should be avoided in the case of calves being transported for slaughter.

The following information on scientific studies of calf transportation appear in the Compassion (2008) report and may be helpful when determining Standards for calves:

- Young calves are particularly poorly adapted to cope with transport, resulting in high mortality rates. The immune system and stress are not yet fully developed. Knowles (1995) reports mortality rates of between 1% and 23 % in a review of the literature on mortality of young calves following transport. The author states “When compared with the transportation of other types of farm animal, mortality rates of these magnitudes would appear to be unacceptable” and notes that calves often “succumb, usually within four weeks, to secondary disease as a consequence of their inability to respond appropriately to transport”. Young calves cannot yet regulate their body temperature adequately and are therefore very susceptible to heat and cold stress during transport. Young calves on full feed and with bedding are thermally comfortable only between 13°C and 26°C (Hemsworth et al. 1995). Compassion observes that they are even less able to tolerate cold if not on feed.
- **Elmer and Reinhold (2003)** exposed healthy young calves aged three to six weeks to either cold or hot air temperatures for four hours (cold = 5°C, hot = 35°C). After this short period of exposure to a temperature of 5°C, calves had airway constriction, pulmonary hypertension (high blood pressure in the arteries that supply the lungs), hypoxemia (abnormally low oxygen level in the blood) and hypercapnia (abnormally high carbon dioxide level in the blood), but managed to maintain body temperature. At 35°C the calves panted and their body temperature increased continuously, which would eventually have led to collapse from heat stress. The authors conclude “Young calves, up to the age of six weeks were not able to tolerate acute changes in ambient temperature”. Such temperature changes are likely to occur during long journeys. A study by **Schrama et al. (1996)** evidenced that calves transported at five days of age had increased heat production for three days after transport, unrelated to their activity levels; calves were not in a steady-state regarding their energy metabolism.
- **In a study reasonably equivalent to the 18 hours duration proposed by the Standards:** Calves can lose a significant amount of bodyweight during transport. **Knowles et al. (1999b)** found that calves [under 4 weeks of age] showed a significant decrease in bodyweight after 9 hours of transport with a one-hour mid journey break, averaging 1.4kg in summer and 2.0kg in winter. The calves’ live-weight and activity of the enzyme creatine kinase took up to seven days to stabilise after transport. Feeding electrolytes during the mid-journey break reduced the extent of dehydration. Food and water deprivation during transport, as well as faecal and urinary losses, combine to

produce acute dehydration and hypoglycaemia (low blood glucose level) in calves, both of which increase with journey time (**Mormede et al. 1982**). Subsequent studies by Knowles *et al* have shown that the solution is to minimise or avoid journeys for young.

- Young calves respond to transport with an increase in body temperature, heart rate and plasma cortisol concentration (indicative of stress) (**Steinhardt and Thielscher 1999**) and significantly increased levels of adrenaline (**Thielscher and Steinhardt 2004**). **Knowles et al. (1997)** noted that the impact of transport on heart rate, plasma cortisol and plasma glucose in young calves was less than that observed in older cattle and other species; the authors suggest this was not because they were less affected but rather because “**they were physiologically unadapted to coping with transport**”.
- **Todd et al. (2000)** found that young calves aged five to ten days would lie down during a 2-hour journey if given a higher space allowance (0.4m²/calf) and also maintained plasma glucose levels and lost less weight than those transported at a lower space allowance (0.2m²/calf). Calves transported for 2 hours at the low space allowance showed significantly higher levels of creatine kinase and lactate than calves at the high space allowance. The authors suggest that the changes in blood metabolites were due mainly to calves transported at low space allowances using their muscles to brace against vehicle movements during transport; they also note that high levels of creatine kinase are associated with bruising, as previously mentioned. Calves that are standing during transport are at risk of collisions or falls as the vehicle accelerates, brakes and corners. Calves up to six months of age, if travelling, should be provided with bedding and space to lie down. (emphasis added)
- Transport is physically exhausting for calves. **Atkinson (1992)** found that calves aged seven to 15 days spent significantly more time resting and sleeping following transport than non-transported control calves and small calves were particularly adversely affected. Van de Water et al. (2003) found that acceleration and vibration during transport can cause fear and physical fatigue in calves; faster acceleration (3ms⁻²) was more stressful than slower acceleration (1ms⁻²).

As a strict minimum, Compassion considers that calves should remain on the property of their birth until 10 days of age. This may involve additional costs, or arrangements, but animal welfare should not be compromised, as it now is by transporting very young calves susceptible to problems of health and welfare. Industry gains its livelihood due to the birth of calves, a proportion of whom are invariably unwanted, to provide an ongoing supply of milk from cows. Producers have an ethical responsibility to provide for the welfare of these young animals.

In conjunction with this requirement, travelling calves should be provided with liquid feed within 12 hours, i.e. should not travel more than 12 hours without provision of liquid feed.

SB *Additional point* (suggest between 4.3 and 4.4 and then renumber): **Electric prodders must not be used on cattle or calves.**

B5 Deer

Amend requirement to:

SB5.4 Electric prodders must not be used

Deer are flighty, highly strung animals. Surely it is an oversight that use of the prodder is permitted. It is inconceivable that responsible Standards for humane animal transport would recommend use of the electric prodder on deer.

The European Food Safety Authority Scientific Report of the Scientific Panel on Animal Health and Welfare (AHAW) in its 2004 report states, p.76: Deer are recently recent domesticated species, and farming practices used for traditional farm animals may have potential detrimental effects on their welfare (Goddard & Matthews, 1994).^{vi}

In addition (p.79): ... deer are best handled by a minimum number of people. Unusual noises are disturbing to deer ... Deer should be driven from the pens or into raceways as a group, moving them steadily, without sudden movements, talking to them in a low voice, calming nervous animals to avoid agitation spreading to the others (Yerex and Spiers, 1987).

New Zealand has a considerable deer industry. The **New Zealand Deer Welfare Code – Animal Welfare (Deer) Code of Welfare 2007, prohibits the use of electric prodders or goads:**

5.4 Restraint and Handling Practices: Minimum Standard No.7 electric prodders or goads must not be used.

B7 Goats

We are surprised to see so little apparent instruction or guidance given for the preparation and transportation of wild goats. There is no reference to their possible needs in the Standards and only one – apparent – reference in the Guidelines, where GB7.8 refers to ‘unmanaged’ goats. Given the possible welfare consequences for wild goats we would expect more concern to be given to wild goats at every stage of the transport process.

GB7.22 Electric prodders should not be used on goats

B8 Horses

SB8.7 Moderate to severely lame horses should not be transported.

Again, we would expect some distinction/reference to be made to the needs of wild and unbroken horses and not mixing wild (as opposed to tame but unbroken animals) and domestic horses/equines, in the Standards (rather than only in the Guidelines).

SB8.11 makes the only distinction, when referring to unbroken stallions.

GB8.2 Compassion considers that transportation of horses with any of the health problems mentioned should only be carried out after considering the welfare of the animal concerned, the treatment and management options and on the advice of a veterinary surgeon.

B9 Pigs

The Standards at present do not protect pigs to be transported in hot or even moderately hot weather, that may permit them to overheat beforehand or in the vehicle.

Standards must refer to the susceptibility of pigs to heat stress and its prevention, and adequately protect pigs to be transported in climatic extremes, i.e. in hot and cold weather.

Pigs are acknowledged to be “**highly susceptible to heat stress**” (OIE Guidelines, Article 3.7.3.12 – Species specific issues), yet neither the proposed Standards nor Guidelines deal with this. The Guidelines refer to poor tolerance of pigs to heat in vehicles and facilities GB9.8, yet the vague requirement, as written, should apply to any farmed species.

Additional examples of superior reference to pigs susceptibility to high temperatures/humidity:

a) **FAO**

Chapter 6 – Transport of Livestock <http://www.fao.org/DOCREP/003/X6909E/x6909e08.htm>

Effects of Transport: Heat stroke – **pigs are susceptible to high environment temperatures and humidity**

b) **Manitoba (Canada) Ag, food and rural initiatives**

<http://www.gov.mb.ca/agriculture/livestock/pork/swine/bab10s06.html>

Precautions in Hot Weather

Pigs have low tolerance to high temperature and high humidity. Avoid transporting pigs in the heat of the day.

Reduce loading density by 10 -25% in hot humid weather. Use wet sand or shavings for bedding, rather than straw.

Cooling is best provided with maximum airflow through the trailer. Do not spray pigs with cold water. Cold water may be applied to the floor of the trailer, or a fine mist spray may be used.

Load and unload promptly. Make a few stops as possible. Do not leave the pigs on a stationary vehicle.

- c) Council of Europe – Committee of Ministers – Recommendation No.R (88) 15 of the Cttee of Ministers to Member States on the Transport of Pigs [http://www.coe.int/t/e/legal_affairs/legal_cooperation/biological_safety,_use_of_animals/transport/Rec%20R%20\(88\)15%20transport%20Pigs.asp](http://www.coe.int/t/e/legal_affairs/legal_cooperation/biological_safety,_use_of_animals/transport/Rec%20R%20(88)15%20transport%20Pigs.asp)

III.1.6. Temperature. Pigs are very susceptible to heat stress.

When deciding whether to transport animals in very hot or cold conditions, due consideration should be given to the length of the journey, the construction of the transport unit, its ventilation, the speed of travel, the number of stops to be made en route as well as the number and age of the animals to be carried.

Transport units which include a temperature-regulating mechanism are advisable on long journeys if the ambient temperatures are likely to fall below 0° C or exceed 25° C during the journey.

- d) Welfare of Pigs during Transport <http://www.grandin.com/welfare.pigs.during.transport.html>
Temple Grandin Dept of Animal Sciences, Colorado State Univ., (USA)

During the summer when the temperature is over 60 degrees F (16 degrees C), wet shavings or sand should be used. Straw bedding is too hot. At 80 degrees F pigs should be sprinkled with water immediately after loading. Heat builds up rapidly in a stationary vehicle. If a truck has to stand when the temperature is over 80 degrees F (27 degrees C), the pigs should be wetted. Research on heat stress has shown that death losses increase as temperatures increase (Knowles and Warriss, 2000, Livestock Conservation Institute, 1981). Truck drivers should drive carefully and avoid sudden stops and rapid acceleration.

- e) The Victorian Code of Practice for land transport of pigs is more satisfactory, see following:

(Vic) Code of Practice for land transport of pigs

4 Pre-transport preparation of pigs

4.1 temperature

4.1.1. Hot weather and high humidity present major risks to pigs because they are unable to disperse body heat by sweating . Therefore it is best avoid transporting pigs in hot conditions.

Wide temp fluctuations between day and night are an additional cause of temp stress.

4.1.2. the loading density should be reduced by at least 10% if the ambient temp rises above 25C

[NOTE: the proposed Guidelines suggest reducing the load by only 5% in ‘very hot weather’ although there is no indication what this may be. Definitely the Victorian provision is superior to the proposed Standards/Guidelines).

4.1.3. Pigs can be cooled by use of water on the floor of pigs pens or by spraying them with water. Only those pigs that have regained their normal temp should be loaded.

4.3 Shelter

4.3.1 Pigs are susceptible to extreme temps. In sunny or hot weather (30C) shade must be provided. Etc.

8.2 Temperature

8.2.1 Transporting pigs in very hot or cold weather should be avoided wherever possible. Vehicle movement is required to provide adequate air flow or ventilation.

Other references can be provided to impress the need to adequately protect pigs during hot weather.

Fitness

GB9.1

i) Should this not be “lameness conditions where a pig **cannot** place weight on all legs” ?

iv) is very poor guidance. Surely pigs must not suffer travel with such extreme growths. Apart from the discomfort to the animal, raised surfaces and ramps will need to be negotiated and will risk injury to the animal. Compassion strongly objects to such a provision. See <http://www.danishpigproduction.dk/index.aspx?id=b961d493-8604-4b8a-8403-2f69256fbdc7> for Danish industry standards for transportation of grown pigs with hernia. Danish standards are ideal, but they provide some rational guidance.

SB9.4 Agree that electric prodders must not be used.

B10 Poultry

Drivers must be responsible for the inspection and welfare of poultry.

GB10.4 Consider that recording of mortalities should be a Standard.

Compassion is concerned at the method of carrying both ‘spent’ layers and ‘broilers’. Hens at the end of lay, particularly those who have been housed in battery cages, will be frail and have brittle bones, likely to break with little pressure. Broilers are heavy for their young age; they may already suffer from hip dislocation, or suffer dislocation during transfer to the transport crate. In all cases, birds will suffer pain. The relatively little (monetary) value of ‘spent’ layers predisposes them to poor treatment, against which they must be protected. Handling is referred to only in Guidelines, which indicates that even this meagre proposal may not be adhered to.

Additionally, observations of the AHAW (p.10) should be noted: When hens are to be removed from a cage they move away from an approaching human. Broiler chickens or turkeys, which are much less mobile than hens, may not always move away from a person who is trying to catch them but, given time, their behaviour indicates that they are *disturbed* by close human approach. After poultry are picked up by humans they may struggle but often hang limply and if put down, show a freezing response (Broom 2000) The behavioural response ... is generally one of *passive fear behaviour* and is *frequently not recognised* by the people

handling them as indicating the severe disturbance which is revealed by physiological measures. (emphasis added)

Page 42 (1) Broilers – birds should be lifted carefully. Ideally this should be by holding the body.

GB10.23 (see note below re recommended Standard) suggests that ‘care’ should be taken when carrying meat chickens to reduce the risk of injury and to keep birds ‘calm’ (see Broom 2000 interpretation of calmness, above, i.e. passive fear behaviour) but then recommends carrying 11 birds at once. Compassion maintains that effective care cannot be taken when carrying such a load, and birds already held will be harmed as additional birds are plucked from the ground. Fewer birds at a time must be carried in a way that protects them from broken bones and bone/joint displacement.

GB 10.25 (see note below re recommended Standard) should also refer to the need to take effective care of layer and breeder hens. However, we again disagree with the manner of carrying birds and number of birds recommended to carry at once, which precludes effective care being afforded these fragile birds.

Should birds be carried by the legs, it must be stipulated that they be held by two and not one leg. It reduces the frequency and severity of haemorrhaging in the thigh (Wilson and Brunson 1968) of broilers and the number of broken bones. Gregory and Wilkins (1992) found that removal of layer hens from cages holding the birds by two legs compared with a single leg reduced the incidence of broken bones from about 13 % to 5%.^{vii}

We consider that specifications for the removal of birds to transport crates and vehicles should be transferred to Standards.

B11 Sheep

SB11.1 We consider time off water for all categories of sheep/lambs to be excessive.

GB11.5 Bedding should also be provided.

Unresolved Issues (identified in the abridged RIS, Appendix 8, pp 26 - 28

Time off water

Compassion considers that in many cases time off water in Standards is excessive and Guidelines designed to address such concerns may or may not be implemented.

We are unable to comment on all species and circumstances, but consider this section of Standards needs considerable improvement to meet the welfare needs of the millions of animals involved.

Transport of Bobby Calves

(dealt with above)

Specification for loading density of livestock

Compassion agrees that specifications for loading densities of animals should be detailed in Standards rather than guidelines. Some may argue that the possible variations that prevail within Australia make this too difficult. Yet other continents and complex regions regulate space allowances e.g. the European Union. According to the RIS (p.vi) the Standards are endeavouring to be considered “within an international context”. Regulated space allowances are accepted internationally and we suggest that Australia, which transports so many animals, sometimes the length and breadth of the country, would be expected to have such Standards.

Appropriate Interpretation of Standards and Guidelines

Compassion is concerned that Guidelines are viewed as contributing to the good welfare of animals rather than providing a defence against prosecution.

Competency for operating vehicles

Proof of competency should still be required for this particular sphere of activity, i.e. animal transportation. It doesn't mean that training need be involved, just proof of competence.

Definitions of welfare risks

Compassion was not involved in detailed discussions leading to the proposed Standards and Guidelines but, knowing the welfare groups that were, supports their opinion.

Definitions of positions of stance

Animals must have the ability to stand at their full height, be this ‘normally’ or ‘naturally’. Inevitably heads will be raised at some stage during the journey and must not be permitted to come into contact with the overhead deck or structure. To do so could not only cause injury, but could cause anxiety and additional movement, which could spread to surrounding animals and lead to other animals suffering.

Deck/roof height does not only provide for the comfortable positioning of animals, but also enables proper inspection of them.

Additional issues associated with time off water (see above).

Issues associated with the handling of livestock.

- The dragging of livestock should not be permitted and that this should be included in Part A Standard(s). Humane destruction of animals unable to walk must be carried out *in situ*.
- We have stated throughout the document that we believe the use of electric prodders should not be permitted.
- We support welfare organisations in their preference for a total ban of biting by dogs. It is inconceivable that this should be permitted and we are astonished to note that the market need for an absence of bitemarks on livestock should be considered sufficient deterrent.

[ends]

ⁱ Council Regulation (EC) No. 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97, Official Journal of the European Union L 3/1

ⁱⁱ The welfare of animals during transport (details for horses, pigs, sheep and cattle) – Report of the Scientific Committee on Animal Health and Animal Welfare (SCAHAW), 2002, European Commission, Health and Consumer Protection Directorate-General.

ⁱⁱⁱ Guidelines for the Transport of Animals by Land, Article 3.7.3.8. 3 a) + b) http://www.oie.int/eng/en_index.htm

^{iv} Handle With Care: long distance transportation of Australian animals for slaughter, WSPA, 2008, p.16.

^v Long Distance Animal Transport in Europe, a cruel & unnecessary trade, a report by Peter Stevenson incorporating material written by Joana Formosinho for Compassion in World Farming (UK), March 2008. (A full list of references contained in the report can be provided.)

^{vi} European Food Safety Authority (EFSA), ‘The Welfare of Animals during Transport’, Scientific Report of the Scientific Panel on Animal Health and Welfare on a request from the Commission related to the welfare of animals during transport (Question No EFSA-Q-2003-094) Adopted on 30 March 2004.

^{vii} AHAW p42 and p444.