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Animal Welfare Standards Public Consultation  
PO Box 196  
Dickson ACT 2602

Dear Sir

Thank you for the opportunity to comment on the Australian Animal Welfare Standards and Guidelines - Land Transport of Livestock.

We feel this is an opportunity for real change and improvement to be made to the conditions animals endure during land transport. As stated in your own information pack the animal welfare perspective process begins before the physical journey and only ends some time after this physical journey is complete. So our comments match this responsibility.

There is however much ambiguity in terms such as 'competent' and 'effective' and leaves this document open to interpretation and thereby allowing loopholes to exist for people to avoid the consequences of negligent or cruel actions. Also without an adequate nationwide training system how does the word 'competent' have any meaning? There are no benchmarks or performance indicators to judge the ability or otherwise of animal handling techniques. This must be changed in the review of the Standards and Guidelines to achieve any real outcomes for animals.

Within the Standards and Guidelines there are matters that are of concern to us and we have listed each area of concern with our comments on the following pages.

### *Responsibilities and planning*

*SA1.2 For a journey reasonably expected to exceed 24 hours, there must be one or more documents that accompany the livestock that specify:*

- i) the date and time that the livestock last had access to water*
- ii) the date and time of livestock inspections and any livestock welfare concerns and actions taken*
- iii) emergency contacts*

*A person in charge who is transferring responsibility for livestock to be further transported for longer than 24 hours must provide a document with this information to the next person in charge.*

- The use of the words “reasonably expected to exceed 24 hours” leaves this Standard open to interpretation about whether or not the driver thought the trip would take over 24 hours.
- The wording of this standard should remove ‘reasonable expected to’ and replace this with ‘which will’.

### *Stock handling competency*

*Objective – Persons responsible for handling, managing or transporting livestock are competent.*

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

- How is this competency set, monitored, updated or revoked? There doesn’t seem to be any rules or regulations underpinning this standard just that they must be competent. This leaves it very much up to the person or their employer to decide if they are competent or not. There obviously must be a nationwide training and accreditation scheme in place for this ‘competency’ to have any validity.

- This Standard should be reworded to read:

*A person involved in handling, selection, loading, transporting and unloading livestock must be trained, competent and accredited through a national training scheme to perform their required tasks, or must be supervised by a trained and competent person who is accredited through a national training scheme.*

### *Pre-transport selection of livestock*

*Objective – Livestock prepared and selected for transport are fit for the intended journey.*

*SA4.1 Livestock must be assessed as fit for the intended journey at every loading.*

*An animal is fit for a journey if it is:*

- i) able to walk on its own by bearing weight on all legs*
- ii) not visibly dehydrated*

- The initial part of this Standard must show that the person assessing the animals as fit for travel are in fact able to do this job. They must be trained and accredited through a national training scheme.

- Animals must not be prodded, poked, pushed or harassed in any way which could mask or obscure an injury. The standard SA4.1 i) should therefore read - able to walk on its own without human interference by bearing weight on all its legs.

- It takes skill and knowledge to be able to correctly recognise signs of dehydration as listed in SA4.1 ii). This again reiterates the point that a training scheme needs to be in place.

*SA4.1 Any livestock judged as not fit for the intended journey must be only transported under veterinary advice.*

- Any permission to travel given under veterinarian approval should be after the animals have been physically sighted and examined by the vet.

- This standard should be reworded to read:

Any livestock judged as not fit for the intended journey must only be transported under signed veterinary authorisation after examining the animals.

*SA5.3 Loading density must be assessed for each pen or division in the livestock crate or each container, based on average liveweight of the intended livestock loading, and must be managed to minimise risk to the welfare of the livestock.*

*Determination of loading density must consider all of the following factors:*

*i) species*

*ii) class*

*iii) size and body condition*

*iv) wool or hair length*

*v) horn status*

*vi) climatic conditions*

*vii) nature of the intended journey*

- This particular Standard is of immense importance as animals can routinely suffer and die in transport after being forced into an already overfull pen.

- The idea that average liveweight can be used as a measure to ensure the animals can fit into the pen is flawed. To use this measurement all the animals would need to be weighed prior to loading, which might not always happen, so guesses/estimates of weight would be used. If too many animals are forced into a pen then the risk of an animal going down and not being able to get up is high.

- The only way to prevent or minimise the risk of suffering and cruelty is to allow enough room for an animal to rise unassisted and to have enough room to move. The weight of an animal should be considered but not be the overriding factor.

- This Standard should be re-worded to allow the density of each pen or division to be based on the ability of each animal to rise unassisted and allowing each animal to have enough room to move if needed to withdraw legs or heads from outside the truck.

- The welfare of the animals should be the priority.

*SA5.11 The driver must inspect livestock (except poultry):*

*i) on the vehicle before departure*

*ii) within the first hour of the journey and then at least every three hours or at each rest stop, whichever comes first*

*iii) at unloading.*

And

*SA5.12 Upon identifying a distressed or injured animal at an inspection, the driver must provide or seek assistance at the first opportunity. Weak, ill or injured livestock must be identified to the person receiving the livestock.*

- A independent system needs to be put in place to ensure the monitoring of stock is happening when and where required and;

- The use of the words “at the first opportunity” is vague and leaves it very much open to interpretation. “At the first opportunity” needs to be clarified so that it ensures assistance for any distressed or injured animal is accessed as a priority.

- Within this Standard is the issue of driver being informed by a member of the public to an animal issue on board his vehicle. As there is no mention of this, the Standard should be reworded to include an SA5.11 iv) when made aware of a problem by a member of the public.

*Loading livestock*

*GA5.1 Before loading, the driver should inspect the condition of the livestock crate and ensure it is correctly set up and fully operational. If inspecting the vehicle at night or where light is insufficient, a portable source of lighting should be available.*

- This should be a standard and the word “should inspect” changed to “must inspect”. All vehicles must be checked to ensure they are in complete working order (fully operational) before loading any animals to ensure the safety and wellbeing of these animals.

*Electric Prodders*

*GA5.10 Electric prodders should not be used repeatedly on a single animal.*

- This guideline falls in the same section as the SA5.7 iv) electric prodders must not be used excessively on an animal. If electric prodders were banned on all animals then this guideline would be redundant.

*Driving Management*

*GA5.24 Ventilation should be appropriate at all times, including when the vehicle is stopped.*

- The use of the word “appropriate” does not give sufficient clarity to this guideline. Animals could be left gasping for air but the ventilation could still be considered appropriate, as the animals did not die.

*Identifying weak, ill or injured livestock upon arrival*

*GA5.48 Livestock (except caged poultry) that cannot walk from the vehicle ('downers') should be destroyed humanely on the vehicle, where practical.*

*Alternatively, facilities, equipment and sufficient personnel should be available for the humane unloading of these livestock and their humane destruction.*

- This should be a standard and the wording “should be destroyed humanely” needs to be changed to read, “must be destroyed humanely.”

- Having this as a Guideline and not a Standard ensures the continued lack of appropriate facilities and training to deal with ‘downer’ animals.

*SA5.6 Livestock must be handled in a manner that is appropriate to the species and class and does not cause pain or injury. Specifically:*

*i) livestock (excluding poultry) must not be lifted off the ground by only the head, ears, horns, neck, tail, wool or feathers*

*ii) livestock must not be lifted off the ground by a single leg except in the case of all poultry, and sheep, goats and pigs if they are less than three months old*

*iii) livestock must not be thrown or dropped*

*iv) livestock must not be punched, kicked or struck by hand or sharp instruments including lengths of metal piping, sticks or belts.*

- It is totally unacceptable that any animal could be routinely lifted by a single leg, regardless of its age. The purpose of any good animal handling techniques is to ensure the best possible animal welfare outcomes. Any standard, that will be enforceable by law, should not allow the mistreatment of any animals. This means SA5.6 ii) should be changed.

- There is also no mention of dragging in this section. This means an animal could be dragged by any part of its body and not be classed as breaching the standard.

- This Standard should be reworded to include that the handling of our livestock should only be done by trained and accredited people who are competent in the appropriate types of handling for each species that does not cause pain, suffering or injury. Further it should be added that no animal can be lifted off the ground, pulled or dragged by the head, ears, horns, wool, neck, tail, wings or feathers and that livestock must not be punched, kicked, thrown or slammed or struck with a hard or sharp instrument including lengths of pipe, sticks or belts.

*SA5.7 Electric prods must not be used:*

*i) on genital, anal or facial areas*

*ii) on livestock under three months of age*

*iii) on livestock that are clearly unable to move away*

*iv) excessively on an animal.*

- Electric prods must not be used on any animal. Their mis-use cannot be regulated and almost all infringements due to overuse would go unreported.

*SA5.8 Dogs must be under control at all times during loading, transporting and unloading livestock. Dogs must not be transported in the same pen as livestock. Dogs that habitually bite: deer, goats, pigs, poultry, sheep and ratites must be muzzled.*

- Dogs cannot be watched at all times.

- Dogs working around livestock in any stage of the transportation network must be muzzled at all times.

### *Humane Destruction*

*Objective: Where it is necessary to destroy livestock, it is done promptly safely and humanely.*

*SA6.3 Where a competent person is not immediately available to humanely destroy an animal, a competent person must be contact to carry out the procedure at the first opportunity.*

- Since the prompt, safe and humane destruction of livestock is of great importance; this Standard shows how the creation of a nationwide training and accreditation scheme would be of enormous benefit to all.

- And again the use of "first opportunity" leaves this Standard open to interpretation.

- This Standard should to be changed to read -

Where a trained, accredited and competent person is not immediately available to humanely destroy an animal, a trained, accredited and competent person must be contact to carry out the procedure without delay."

*SA6.4 A person humanely destroying an animal must take reasonable action to confirm the animal is dead and to ensure death.*

- It is mentioned in your own guidelines that determination of death is difficult to judge and requires experience with different species responses.

- This standard should be reworded to read:

A person humanely destroying an animal must be trained, accredited and competent and must take reasonable action to confirm an animal is dead and to ensure a humane death.

*SA6.8 Animals must be assessed to be unconscious before pithing.*

- This Standard talks of assessing an animal to be unconscious which is not an easy thing to do. This is another area where a nationwide training and accreditation scheme would be of great benefit. This Standard should be reworded to read:

A trained, accredited and competent person must assess animals to be unconscious before pithing.

### *Species Specific Standards*

*B2 Specific requirements for the land transport of buffalo*

*SB2.4 Electric prodders must only be used on buffalo after reasonable actions to cause movement have failed.*

- Guidelines GB2.15 clearly says, "electric prodders should not be used on buffalo because they may become aggressive." This standard should to be reworded to read: Electric prodders must not be used on buffalo.

*B3 Specific requirements for the land transport of camels*

*SB3.6 Electric prodders must only be used on camels after reasonable actions to cause movement have failed.*

- This standard needs to be reworded to read: Electric prodders must not be used on camels.

*B4 Specific requirements for the land transport of cattle*

*SB4.1 Time of water must not exceed the time periods given below:*

<i>Class</i>	<i>Max Time Off Water</i>
<i>Cattle over 6 months old</i>	<i>48 hours</i>
<i>Calves 1-6 months</i>	<i>24 hours</i>
<i>Lactating cows with calves at foot</i>	<i>24 hours</i>
<i>Calves 5-30 days old travelling without mothers</i>	<i>18 hours</i>
<i>Cattle known to be more than 6 mths pregnant</i>	<i>24 hours</i>

- Is there any scientific data to suggest that cattle can travel for 48 hours without water and be physically and psychologically healthy?

- This standards times should to be changed as follows:

<i>Class</i>	<i>Max Time Off Water</i>
<i>Cattle over 6 months old</i>	<i>38 hours</i>
<i>Calves 1-6 months old</i>	<i>18 hours</i>
<i>Lactating cows with calves at foot</i>	<i>18 hours</i>
<i>Calves 5-30 days old travelling without mothers</i>	<i>8 hours</i>
<i>Cattle more than 6 months pregnant</i>	<i>18 hours</i>

Excluding the last 4 weeks.

*SB4.4 Calves less than 5 days old travelling without mothers must only be transported directly to a calf-rearing facility and must:*

- i) be fed colostrum on the property of origin*
- ii) be fed a liquid feed within 6 hours before loading*
- iii) be provided with thick bedding and room to lie down*
- iv) be protected from cold and heat*
- v) not be consigned through saleyards*
- vi) not be transported for longer than 6 hours.*

-It would be difficult for anyone to know, with the possible exception of the consignor, the exact age of any calves being transported and to have no parameters regarding minimum age requirements/definitions leaves this Standard open to very young and vulnerable calves being transported. This standard must be re-worded to at least provide the minimum of protections for calves.

- This Standard must include the following wording:

The umbilical cord must be shrivelled before the animals can be transported.

*SB4.5 Calves between 5 and 30 days old travelling without mothers must:*

- i) be protected from cold and heat*
- ii) be prepared and transported to ensure not more than 18 hours since last feed*
- iii) have an auditable and accessible record that identifies the date and time that the calves were last fed, unless the journey is between calf rearing properties and is less than 6 hours duration.*

- Calves should only be transported when their umbilical cord was dried up and there needs to be definitions of cold and heat.

*B5 Specific requirements for the land transport of deer*

*SB5.1 Time off water must not exceed the time periods given below:*

<i>Class</i>	<i>Max Time Off Water</i>
<i>Deer over 6 months old</i>	<i>48</i>
<i>Fawns/calves under 6 months old</i>	<i>28</i>
<i>Deer known to be more than 5 months</i>	<i>24</i>

*Pregnant excluding the last four weeks*

- This standard should be reworded to read:

<i>Class</i>	<i>Max Time Off Water</i>
<i>Deer over 6 months old</i>	<i>32</i>
<i>Fawns/calves under 6 months old</i>	<i>18</i>
<i>Deer more than 5 months pregnant excluding the last four weeks</i>	<i>18</i>

*SB5.4 Electric prodders must only be used on deer after reasonable actions to cause movement have failed.*

- As deer are easily frightened the use of electric prodders is unacceptable.
- This Standard should be re-worded to read: Electric prodders must not be used on deer.

*Fitness*

*GB5.5 Deer that are due to calve within one month or with young at foot (less than one month old) should not be transported unless in an emergency for the welfare of the deer, and special provisions (as advised by a veterinarian) are in place to ensure that transport does not result in adverse welfare outcomes.*

- This should to be a standard with the veterinarian advice in writing.

*Handling*

*GB5.17 Electric prodders should not be used on fawns or calves.*

- If the Standard says they must not be used at all then this guidelines becomes redundant.

*B7 Specific requirements for the land transport of goats*

*B5.1 Time off water*

- The amount of time off water needs to be reduced by at least 10 hours on each category.

*Handling*

*GB7.22 Electric prodders should not be used on pregnant goats.*

- Under the Standards for goats they have been afforded no protection from electric prodders with the exception of pregnant goats in this Guideline.
- There needs to be an additional Standard that reads: Electric prodders must be not used on goats.

*B8 Specific requirements for the land transport of horses*

*SB8.1 Time off Water*

- The time off water periods listed in this Standard are extremely long especially for foals less than 6 months old.
- The Standard for foals less than 6 months old should be changed to read - 8 hours maximum time off water.

*SB8.4 Mares known to be in the last 4 weeks of pregnancy must be transported under veterinary advice unless the journey is less than 4 hours.*

- The use of the words “known to be” appears to create a loophole that allows the transportation of mares very late into a pregnancy.
- This Standard should be changed to read – Mares in the last 4 weeks of pregnancy must only be transported under written veterinary advice and only if the journey is less than 2 hours in length.

*B9 Specific requirements for the land transport of pigs*

*SB9.1 Time off water must not exceed the time periods given below:*

<i>Class</i>	<i>Max Time Off Water</i>
<i>Pigs</i>	<i>24</i>
<i>Lactating sows with piglets</i>	<i>12</i>
<i>Weaners</i>	<i>12</i>

- This Standard should be changed to read:

<i>Pigs</i>	<i>18</i>
<i>Lactating sows with piglets</i>	<i>10</i>
<i>Weaners</i>	<i>10</i>

*GB9.2 Transporting sows about to farrow or more than 80 days pregnant should be avoided. Transport of sows should be over short distances. Additional care should be provided, and may include space to lie down on the vehicle and appropriate feed and water.*

- This Guideline needs to be a Standard and changed to read:  
Transporting sows about to farrow or more than 80 days pregnant must be avoided. Transport of non-pregnant sows must be over short distances. Additional care must be provided, and must include space to lie down on the vehicle and appropriate feed and water.

*GB9.3 Transport of lactating sows with piglets should be avoided. If transported, the lactating sows should be segregated from all other pigs and the piglets protected appropriately. Additional care should be provided and may include space to lie down on the vehicle, and appropriate feed and water.*

- This Guideline needs to be a Standard and slightly reworded:  
Transport of lactating sows with piglets must not be undertaken.

*B10 Specific requirements for the land transport of poultry*

*SB10.4 Containers must:*

- i) be lifted and placed with care*
- ii) be positioned on the vehicle in an upright position without excessive tilting*
- iii) not be dropped or thrown*
- iv) be securely attached to the vehicle*
- v) be suitable for the intended purpose*

This Standard should be reworded to cover the problem of excessive tilting. The new Standard should read:

Containers must:

- i) be lifted and placed with care
- ii) be positioned on the vehicle in an upright position without tilting
- iii) not be dropped or thrown
- iv) be securely attached to the vehicle
- v) be suitable for the transport of the species of live poultry

SB10.6 Poultry, excluding chicken breeder birds, geese, turkeys and ducks, must not be lifted or carried by the head, neck, wings, feather or tail feathers unless otherwise supported by the breast.

Exceptions are permitted for:

- i) chicken breeder birds and adult geese may be lifted and carried by the base of both wings
- ii) turkeys may be lifted by the tail feathers and neck or by a leg and wing
- iii) ducks may be lifted and carried by their necks or by the base of both wings

- The list of exceptions to the lifting and carrying of poultry would seem to allow many areas for potential breaches of duty of care whilst still abiding by this Standard. The handling of these birds must only be carried out by trained and accredited people.

This Standard should be reworded to read:

Poultry must not be lifted or carried by the head, neck, wings, feathers or tail feathers. There are no exceptions.

*B11 Specific requirements for the land transport of sheep*

*SB11.1 Time off water must not exceed the time periods given below:*

<i>Class</i>	<i>Max Time Off Water</i>
<i>Sheep over 4 months old</i>	<i>48</i>
<i>Lambs under 4 months old</i>	<i>28</i>
<i>Ewes known to be more than 14 weeks pregnant exuding the last 2 weeks.</i>	<i>24</i>

- These maximum off water times are very long and are particularly onerous for lambs under 4 months old.

- This Standard should be reworded to read:

Sheep over 4 months old	38
Lambs under 4 months old	18
Ewes more than 12 weeks pregnant excluding the last 4 weeks.	18

*GB11.12 Sheep have a high level of herding instinct and handling techniques should use this behaviour to handle sheep with minimal care.*

-Unfortunately there is no Standard about protection from electric prod use and this guideline is vague and gives the sheep no protection whatsoever from rough handling and electric prod use.

- There needs to be an additional Standard: Electric prods must not be used on sheep.

We look forward to receiving your reply and seeing our concerns addressed in the final version of these Standards and Guidelines. If any additional information or clarification is required please do not hesitate to contact me on 07 3255 9572 and our sector when commenting on the Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock is “animal rights organization”.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Annette Guice', written in a cursive style.

Annette Guice  
President