



## HUNTER ANIMAL WATCH Inc.

Charity No. CFN15806

ABN 67 481 138 290

**President :** Pam Hopkins, 23 Nilands Lane, Woodberry, 2322 Tel: 02 4966 4344  
**Secretary:** Olga Parkes, 106 Grandview Rd., New Lambton 2305 Tel: 02 4952 1358  
**Treasurer:** Pat Hinton, 6 Sophia Jane Avenue, Woodberry 2322 Tel: 02 4966 4344

16<sup>th</sup> May, 2008

Animal Welfare Standards Public Consultation  
PO Box 196  
Dickson  
ACT 2602

Dear Sir/Madam,

**SUBMISSION FROM HUNTER ANIMAL WATCH INC.**  
**SECTOR – ANIMAL WELFARE**  
**COMMENTS ON AUSTRALIAN STANDARDS AND GUIDELINES FOR THE**  
**WELFARE OF ANIMALS**  
**LAND TRANSPORT OF LIVESTOCK**

Hunter Animal Watch, a registered charity working for animals, submits the following comments.

**A GENERAL COMMENT:**

We note the dollar value of livestock transported in Australia, the estimate of the number of animals transported, kilometers and hours involved. Taking a broad view, most of these animals are hooved animals. In the long term they have a negative impact on soils and available water on this dry continent.

To assist us to assess the Standards and Guidelines we read the Council of the European Union document of 22<sup>nd</sup> December, 2004 – *Protection of Animals During Transport and Related Operations*.

We understand that the Standards and Guidelines have been produced after lengthy consultation with stakeholders. In comparison with EU requirements, it appears to us that animal welfare has been compromised

somewhat, perhaps because concerns other than animal welfare have been given undue emphasis.

We note the **Definitions** (as per pp. 6/7 of the Public Consultation Kit document) namely:

**Standards**

The minimum requirements that must be met under animal welfare laws.

**Guidelines**

Recommended practices to achieve desirable animal welfare outcomes.

*Minimum requirements are not good enough if Australia is to provide adequate conditions for land transport of animals. The aim should be for “desirable animal welfare outcomes”. These can only be achieved if appropriate guidelines are incorporated in the Standards.*

**SPECIFIC COMMENTS OF ABRIDGED RIS:**

The Standards suggested are quite low; certainly lower than EU requirements for instance. This is very disappointing as the abridged version of the RIS suggests a benefit of the Standards would result in “an enhanced international reputation.” We disagree that this will be the case. This would only occur if Australia aimed for “world’s best practice”.

We note the word “must” is used in Standards and the word “should” is used in Guidelines. This is a very usual use of words in animal welfare. It seldom benefits animals. As the RIS acknowledges, animal welfare is growing in importance to consumers and trading partners, and if Australia is to enhance its reputation, the Standards need to incorporate appropriate Guidelines.

We note the problems that the proposed Standards are endeavouring to address.

We note the policy objective –

***To ensure that the conditions under which livestock are transported on land are consistent with reasonable animal welfare outcomes.***

The word “reasonable” - what does it mean in this context? It should not be used in the policy objective as it is vague and open to interpretation.

p. viii of the abridged RIS suggests the proposed Standards are expected to result in.....

“improved livestock welfare outcomes – risks to welfare will be minimized and no species or class will be worse off.”

“no species or class will be worse off” is a very negative concept when the thrust is towards improvement of welfare outcomes.

p. 18 of the abridged RIS considers **STOCK-HANDLING AND COMPETENCY**. Competence must be assessed. There is an urgent need for a national training programme for stock handlers. These individuals are crucial for good animal welfare outcomes. As the document indicates, they need competence in many areas and we believe training is required to ensure this, and should lead to a nationally recognized qualification.

p. 19 **PREGNANCY**

Transporting animals in the last two weeks of pregnancy is undesirable. If they need to be moved to better circumstances, it should be done earlier than two weeks before birthing.

p. 20 **INSPECTIONS**

With the stocking densities suggested in the document, in many cases proper inspections could not be carried out.

p. 20 **JOURNEY TIMES**

Permissible length of time in transport is frequently excessive and can often increase due to unforeseen circumstances. Length of journey poses serious threats to welfare.

p. 21 **WATER**

We are shocked at the lengths of time when off-water is permissible. These times bear no relationship to the needs of the animals and the issue of time off water needs to be re-visited.

p. 24 **YOUNG LIVESTOCK**

Referring to bobby calves and poultry chicks, the document notes that these “are the only category of young livestock that are transported in large numbers without the protection of their mothers.” The phrase “without the protection of their mothers” is bizarre in this context. Should they be present, their mothers could not protect these young animals in any real sense of the word.

p. 25 **ELECTRIC PRODDERS**

Preferably these devices should not be used at all.

**APPENDIX 8 – P. 26 UNRESOLVED ISSUES**

**TRANSPORT OF BOBBY CALVES**

If calves are destined for an abattoir, they should not be transported at all. They should be killed by captive bolt immediately they are born to prevent bonding with the mother. There has to be a place for compassion in our dealings with animals, and this is one such instance.

**PART A GENERAL STANDARDS AND GUIDELINES FOR THE TRANSPORT OF LIVESTOCK**

**1. RESPONSIBILITIES AND PLANNING**

**Standards**

Careful documentation should be used throughout all journeys and the details made know to all those involved.

### **3. TRANSPORT VEHICLES AND FACILITIES FOR LIVESTOCK**

Guideline GA3.6. We would suggest that limbs **MUST** not protrude. “Should” is not adequate. We have seen too many animals completely helpless with their limbs sticking out from the crate.

### **5. LOADING, TRANSPORTING AND UNLOADING LIVESTOCK**

Standard SA5.6 From the document it appears that it is permissible to lift poultry, sheep, goats and pigs (if pigs are less than 3 months old) by one leg. This handling method is unacceptable and should be disallowed.

SA5.7 **Electric prodders** should not be used at all. Loading, transporting and unloading is stressful not only for animals, but also for handlers. There should not be the possibility of “getting the job done” with the use of a prodder.

### **6. HUMANE DESTRUCTION**

#### **Observing Livestock After Humane Destruction**

A high level of expertise is required for humane destruction. This is an area where advanced training is required.

### **PART B**

B1 Specific Requirements for the Land Transport of various Species  
Some animals, notably those of high value, receive a higher standard of care.

For most others, we believe that time off water is often far too long , and space on vehicles is inadequate.

To mention just one issue where animal welfare is seriously compromised is the transport of calves. The concept that young animals that feed from their mothers constantly, can suddenly adapt to being without food, is totally

unacceptable. It is clear from the Standards (p. 49) that efforts have been made to accommodate the needs of these young animals, but they are inadequate.

---

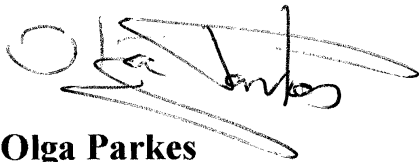
Hunter Animal Watch Inc. is very disappointed in these Standards and Guidelines. Too much is left to subjective judgment and interpretation. They fall far short of Australia's claim to have high animal welfare standards.

As these Standards and Guidelines, when finalized, will become internationally known, we regret that they will do nothing to enhance Australia's reputation.

We appreciate having had the opportunity to take part in this Public Consultation.

On behalf of Hunter Animal Watch Inc.,

Yours truly,

A handwritten signature in black ink, appearing to read 'Olga Parkes', with a large, sweeping flourish extending to the right.

**Olga Parkes**  
**Hon. Secretary.**

**Email: [animals@networksmm.com.au](mailto:animals@networksmm.com.au)**