

Land Transport RIS Submissions
PO Box 196
DICKSON
ACT 2602

WA

Dear Sir/Madam

Having read the national standards for animal transport I am concerned that there is a great deal of ambiguity. Terms such as 'competent' and 'effective' used in the document are subjective and conditional, thus open to interpretation. If used, these terms must be quantified and defined.

For example

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

"Reasonably expected" means the driver can legally use ignorance in not knowing that the transport took longer than 24 hours to avoid having documentation for water. This abdicates him of responsibility for the welfare of the animals.

Any professional transporter must know exactly how long a transport will take. If he doesn't know he shouldn't be driving the truck. They must allow for the distance and all contingencies including checking the welfare of the animals and unforeseen delays and have the documentation on water.

Replace with:

SA1.2 For a journey which will exceed 24 hours, there must be one or more documents that accompany the livestock and 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.**

and

Standard SA5.7 Electric prodders must not be used :

- i) on genital, anal or facial areas*
- ii) on livestock under three months old*
- iii) on livestock that are clearly unable to move away*
- iv) excessively on an animal.*

This standard is impossible to police and enforce. What does excessively mean? 2 or 3 times on an animal or 10-12 times? Can they be used on downer animals which cannot get up because they are too ill or exhausted? Inflicting pain on an animal already suffering is just too much. And again young animals do not come with year of made dates- who can tell how old is 3 months. This SA5.7 sounds restrictive but in effect allows poor handling and abuses to continue.

It is unbelievably arrogant of humans to think we can inflict pain and suffering by way of an electrical charge in order to move animals because we have not the inclination or common sense to understand and use the natural behaviours of the animal.

To prevent suffering the use of electrical prodders should be banned and replaced with compulsory classes in low stress handling techniques.

Replace with:

SA5.7 Electric prodders must not be used on any animal other than in self defense when dealing with bulls, must be as a last resort, and when used it must not be used on sensitive areas –anus and genitals, face and head, underbelly of the animal.

Standard SB2.1 Time off water must not exceed the time periods given below:

Class

Maximum time off water (hours)

Adult buffalo over 6 months old 36

Buffalo 1–6 months old 24

Buffalo known to be more than 7 months pregnant excluding the last 4 weeks and lactating buffalo with calves at foot 24

Transporting late pregnancy animals does potentially prevent cruelty. Those loading should know if the animals are pregnant- if there is doubt then do not transport.

Replace with:

SB2.1 Time off water must not exceed the time periods given below:

Class

Maximum time off water (hours)

Adult buffalo over 6 months old: 28

Buffalo 1–6 months old: 18

Buffalo more than 7 months pregnant excluding the last 4 weeks, and lactating buffalo with calves at foot: 18

Standard SB3.1 Time off water must not exceed the time periods given below:

Class

Maximum time off water (hours)

Camels over 6 months old: 24

Camels known to be more than 9 months pregnant excluding the last 4 weeks: 24

The standards use the term 'known to be' which gets transporters off the hook if there are problems-(they can claim they didn't know they were pregnant.) however, it demands that they know if they are in the last 4 weeks of pregnancy. Surely, if the transporter or consignor is to know if his animals are in the last 4 weeks of pregnancy then it is reasonable to say he should know if they are pregnant at all.

Replace with:

SB3.1 Time off water must not exceed the time periods given below:

Class

Maximum time off water (hours)

Camels over 6 months old: 24

Camels more than 9 months pregnant excluding the last 4 weeks: 18

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

Class

Maximum time off water (hours)

Deer over 6 months old: 48

Fawns/calves under 6 months old: 28

Deer known to be more than 5 months pregnant excluding the last four weeks: 24

We know of no scientific data to suggest that deer can travel for 48 hours without water and be physically and psychologically healthy at destination. Water deprivation especially during hot weather whilst taking into account variables such as penning densities, internal crate temperatures can affect the coping mechanisms significantly. Given the note provided with this standard is that: Deer are generally not watered on transport vehicles. Unloading for spells should be avoided for welfare and biosecurity reasons. However, spells longer than 4 hours can be deducted from the total water deprivation time. A spell less than 4 hours is not recommended or recognised for water deprivation time calculation, but can be taken as necessary. The animals during any spell will remain on board the transporter. If the internal temp is enough to stress the animals then the potential to suffer is increased when the animals are not able to move freely, rest and take on water at will.

Deer farming is specialised in nature therefore they should know if the does are pregnant. It is not acceptable to include 'known to be' as this lets the consignor off the hook should problems arise.

Replace with:

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

Class

Maximum time off water (hours)

Deer over 6 months old: 32

Fawns/calves under 6 months old: 18

Deer more than 5 months pregnant excluding the last four weeks, and lactating deer with fawns/calves at foot: 18

Standard SB5.2 If deer over 6 months old have been off water for 48 hours, they must be spelled for 36 hours before starting another journey. If fawns or calves have been off water of 28 hours, they must be spelled for 12 hours before starting another journey. If deer known to be more than 5 months pregnant excluding the last 4 weeks, have been off water for 24 hours, they must be spelled for 12 hours before starting another journey.

Replace with:

SB5.2 If deer over 6 months old have been off water for 38 hours, they must be spelled for 30 hours before starting another journey. If fawns or calves have been off water of 18 hours, they must be spelled for 12 hours before starting another journey. If deer more than 5 months pregnant excluding the last 4 weeks, have been off water for 18 hours, they must be spelled for 12 hours before starting another journey.

Standard SB5.3 Deer known to be in the last 4 weeks of pregnancy must only be transported under veterinary advice unless the journey is less than 4 hours duration.

Late Pregnancy animals should not be transported at all. The consignor should know if the animal is pregnant. That's his responsibility. We know industry wants all care and no responsibility, but it is unacceptable.

Replace with:

SB5.3 Deer in the last 4 weeks of pregnancy must not be transported. The navel must be healed on calves before transport.

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

Deer are easily frightened and fragile creatures. It is totally unacceptable that an implement for violence is used against these timid animals just because we are too stupid to use more cultured methods. If the industry wants to exploit them the industry must learn respect and care.

Replace with:

SB5.4 Electric prodders must not be used on deer

Standard SB5.5 Approved methods of humane destruction for

i) deer are firearms captive bolt or lethal injection.

ii) fawns are firearms, captive bolt, lethal injection or blunt trauma; blunt trauma must only be used for fawns that are less than 24 hours old and where there is no firearm or captive bolt available.

There are serious issues with the use of blunt trauma such as: the ability to restrain the animal, the accuracy and repeatability of the smashing of the head. There is no way of ensuring 'destruction' is 'humane' (if this is at all possible,) if the person is not trained, accredited and competent to carry out the task.

Replace with:

SB5.5 Approved methods of humane destruction for:

i) deer are firearms captive bolt or lethal injection.

ii) fawns are firearms, captive bolt, lethal injection or blunt trauma; blunt trauma must only be used for fawns that are less than 24 hours old and where there is no firearm or captive bolt available.

Destruction of deer must only be carried out by persons trained, accredited competent in emergency slaughter.

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

Class

Maximum time off water (hours)

Pigs: 24

Lactating sows and piglets: 12

Weaners: 12

Replace with:

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

Class

Maximum time off water (hours)

Pigs: 18

Weaners: 10

Standard SB9.2 Journey time may be extended to 48 hours only under the following conditions:

- i) pigs must have access to water on the vehicle
- ii) there must be space for all pigs to lie down
- iii) pigs must be assessed regularly to be fit for the remainder of the intended journey
- iv) pigs must be provided with water, food and rest for 24 hours before starting another journey.

Although water is provided, feed is not. In our opinion, two full days is too long to transport pigs without feed. Pigs are also easily prone to heat stress therefore less pigs must be loaded to assist in minimising internal truck temperatures. #v) was a guideline with any definition as to what 'hot weather' actually means. 20 30 40 degrees?

Replace with:

SB9.2 Journey time may be extended to 40 hours only under the following conditions:

- i) pigs must have ready access to water on the vehicle**
- ii) there must be space for all pigs to lie down**
- iii) pigs must be assessed regularly to be fit for the remainder of the intended journey**
- iv) pigs must be provided with water, food and rest for 24 hours before starting another journey.**
- v) 5% fewer pigs must be loaded in weather- temp exceeding 30 degrees**

Standard SB9.5 Approved methods for humane destruction are:

- i) for pigs are firearm aimed in the frontal or temporal position, captive bolt aimed in the frontal position
- ii) for piglets less than 15 kilograms are blunt trauma, firearm, captive bolt or lethal injection.

There are serious issues with the use of blunt trauma such as: the ability to restrain the animal, the accuracy and repeatability of the smashing of the head

How will anyone know that the piglets weigh less than 15 kilos?

Replace with:

SB9.5 Approved methods for humane destruction are:

- i) for pigs are firearm aimed in the frontal or temporal position, captive bolt aimed in the frontal position**
- ii) for piglets less than 15 kilograms are, firearm, captive bolt or lethal injection.**

Standard SB10.1 Time off water must not exceed the time periods given below:

Class

Maximum time off water (hours)

Poultry: 24

Chicks: 60(a) following take off (b)

(a) Normal allowable time off water is 72 hours, allowing 12 hours for hatching time before removal (take off) from the hatchery

(b) Water deprivation time allowed can be up to 72 hours if provided with hydrating material in the transport container

The wording of this Standard is very ambiguous. Does the a) and b) section mean the chicks can be transported for 72 hours then another 72 hours so long as in the last 72 hour period they have hydrating material supplied?

What is hydrating material? No mention of the water content within the material. 72 hours or 3 days is a very long time without water for any animal. Also this standard above does not concur with EU regulations in any way.

Class

Maximum time off water (hours)

Poultry: 12

Chicks: 0

Maximum transport time is 12 hours without feed or water.

Chicks can be transported without feed and water for 24 hours, if the transport is undertaken within 72 hours after hatching

Standard SB10.3 Poultry, excluding chicks, must not be held in containers for more than 24 hours, unless provided with feed, water and shelter.

It is essential for good welfare that poultry are given protection from hot or cold temperatures and overseas (EU) regulations prevent poultry being denied feed and water for a maximum of 12 hours

Replace with:

SB10.3 Poultry, excluding chicks, must not be held in containers for longer than 12 hour unless provided with feed and water. Shelter from hot or cold weather must be provided.

Hot weather- temperature definitions MUST be provided.

Standard 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.

What does excessively mean?

Replace with:

SB10.4 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**

Standard SB10.5 Poultry with broken legs or poultry that are unable to walk must not be transported.

What about those birds who have difficulty walking? Perhaps severely deformed in one leg?

Replace with:

SB10.5 Poultry with broken legs, poultry that are unable to walk or who are able to use only one leg to walk must not be transported.

Standard SB10.6 Poultry, excluding chicken breeder birds, geese, turkeys and ducks, must not be lifted or carried by the head, neck, wings, feathers 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 a wing
- iii) ducks may be lifted and carried by their necks or by the base of both wings.

The exceptions provide for the potential to abuse birds and clearly this standard MUST prevent cruelty not provide a legal basis for covert cruelty to occur. Handling must be carried out by trained, accredited competent operators and with respect and consideration.

Replace with:

SB10.6 Poultry must not be lifted or carried by the head, neck, wings, feathers or tail feathers. There are no exceptions.

Standard SB10.9 The approved methods for humane destruction of poultry are cervical dislocation, decapitation or use of CO2 gas.

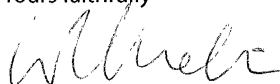
There are serious welfare issues with these types of killing whereby the death is not immediate; there is an ability to restrain the animals, repeatability of the slaughter and pain to the animal, death is not immediate, suitable equipment, and lastly there is a lack of people trained, accredited and competent to undertake this task.

Replace with:

SB10.9 The approved methods for humane destruction of poultry are cervical dislocation, decapitation or use of CO2 gas. Only operators which have been trained; and are accredited and competent are to undertake this task.

Please consider these amendments which protect animals and are not ambiguous. Don't let the animals down. We are all they have.

Yours faithfully



Lauren Wilhelm