



SUBMISSION

SUBMISSION TO

Animal Health Australia

IN RESPONSE TO

**Australian Animal Welfare Standards & Guidelines
for the Land Transport of Livestock**

May 2008

PREFACE

The red meat sector is now Australia's No.1 agricultural enterprise. The Australian Meat Industry Council (AMIC) is the only employer association and recognised Peak Council in Australia, representing the commercial export and domestic processing industry.

AMIC is also the Peak Council representing the post-farm gate sector including smallgoods manufacturers, wholesalers, distributors, boning rooms and independent retail butchers – in total, close to 3,000 member companies representing over 55,000 workers directly employed in meat processing, exporting, wholesaling and retailing in Australia.

In addition, there is conservatively at least the same number again of Australian's involved in the road transport, shipping, carton and equipment manufacture, insurance, banking, laboratories and other ancillary industries – all dependent on the red meat processing and export sector for a proportion of their livelihood – an industry worth an estimated A\$15 billion to the Australian economy in total.

AMIC provides services and support to members that improves their working environment and is focused on achieving the best outcomes for the industry and its members as part of one voice on issues critical to their business.

This submission provides the AMIC's response during the public consultation process for the draft Australian Standards and Guidelines for the welfare of animals – land transport, and reflects the views of AMIC members.

INTRODUCTION

AMIC has a key role in developing and promoting animal welfare standards within industry that aim to improve animal welfare and meet the expectations of stakeholders and customers. As part of the AMIC strategic plan, a key goal is to deliver high animal welfare standards that are linked with other sector activities across the production chain to ensure the welfare of livestock from birth to slaughter. The mission of the livestock processing industry with regard to the welfare of animals is to ensure acceptable animal welfare standards are implemented and effectively verified.

AMIC supports the Australian Animal Welfare Strategy (AAWS), an initiative developed by the Federal Government, aimed at safeguarding animal welfare through the adoption of sound animal welfare standards and practices.

One key project under the AAWS process is the development of Australian Standards and Guidelines for animal welfare from existing Codes of Practice, that will be consistently legislated and enforced in all jurisdictions. This submission relates to the series of Codes currently being revised and that relate to the land transport of livestock.

AMIC supports the development of the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock towards, with the subsequent implementation of consistent legislation and across all jurisdictions. As such, AMIC is appreciative of the opportunity to have had direct representation on the national Standards Reference Group, with the responsibility of contributing to the Standard development process. To date, AMIC's objective as a representative of the SRG has been to contribute towards the establishment of agreed, sound and practical animal welfare standards that deliver good animal welfare outcomes in the livestock transport sector and that provide sound basis for linkage with other sector activities in the future.

AMIC supports the draft Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock and believes these will contribute towards improved animal welfare outcomes. This submission provides some further comment and suggestions towards the final Land Transport Standard.

LAND TRANSPORT STANDARD AND GUIDELINES

The following points outline AMIC's general comments regarding the Land Transport Standard and Guidelines:

GENERAL COMMENTS FOR THE LAND TRANSPORT STANDARDS AND GUIDELINES

1) The basic principles underpinning the Land Transport Standard and Guidelines

AMIC expresses concern regarding the basic principles underpinning the definition of Standards and Guidelines and their respective roles in the Land Transport Standard.

AMIC recognises that from the outset of the review/reformat of the Codes of Practice into Australian Standards and Guidelines, there was to be agreement towards ensuring national consistency in terms of the resultant legislation.

AMIC is concerned that there will still be differences in terms of:

- 1) the content to be legislated, and
- 2) in the interpretation, as a result of inconsistent perspectives provided by jurisdictions, together with the framework presented in the documentation.

There still appears to be differing views on the position of the Guidelines in legislation. AMIC appreciates that Regulators have verbally indicated that it is unlikely they would prosecute people who are in breach of the Standard but abide by the Guideline, however there is no written assurance that this will be the case. Despite advice from AHA and other representatives from jurisdictions regarding the intent that only the Standards be legislated, recent discussions (SRG 5 + 6) indicated that some jurisdictions will be referencing the Guidelines in legislation, advising these be used for the purposes of defence in the event of prosecution.

The Guidelines are defined in the document as "best practice" and as such often exceed the Standard in requirements. If an individual chooses to meet the minimum requirements of the Standard but for some reason is found to be in breach, then they are not able to use the Guidelines in their defence. AMIC suggests then that as the content of the Guidelines surpass the Standards in many cases, they become defacto Standards.

The above comment relates specifically to Part B of the document, as Part A guidelines appear to be more directed towards underpinning the standard, providing information where Standards are not specified and giving more detail on various practices. Part B guidelines are directed towards best practice, rather than underpinning the standards and in many cases supersede the Standards themselves (examples GB1.1, 1.4, 1.7, 3.2, 3.4, 3.5, 4.3, 4.4, 4.6, 4.7, 4.8, 4.9, 4.15 etc)

As such, it is AMIC's view that any guidance material which is presented in support of the new Standards should be limited to "compliance" matters. To do otherwise exposes a real risk that the guidance material supplied will be applied in a manner that exceeds effective enforcement of the stated objectives of the Standards and offends principles of "minimum effective regulation" endorsed by the Council of Australian Governments.

This is particularly concerning when the guidance material has not been subjected to the same level of scrutiny as the Standards by SRG or the Regulatory Impact Statement, nor will be via the rule making process to follow. Furthermore, as some Standards are outcome based, information from the Guidelines will be needed to resolve differences in interpretation and this will be complicated by the matter of the guidelines in many places either contradicting the Standard or being at a higher level (that is 'best practice') than the minimum standard. This has been the basis for AMIC's previous suggestion to 'split' the Standards and Guidelines in this process.

As stated in our previous submission (Jan 19 08), to meet 'minimum effective regulatory criteria' we submit that two options exist:

Option a) the Guidelines definition be re-considered and they be re-written as compliance guidelines, where the definition of the Guidelines should reflect their role in providing interpretation and underpinning of the Standard rather than "describe a superior livestock welfare outcome additional to the standards". This was originally agreed in early SRG meetings and in the Terms of Reference for the project.

Option b) involves the current 'best practice guidelines' being divorced from the standards and being developed separately by Industry and government as per AMIC's original submission.

2) Standard and Guideline consistency and practicality

AMIC is concerned that the inconsistencies between the Standard and the Guidelines, and additionally within the Guidelines themselves, will render the document unworkable in practice.

There are several inconsistent and conflicting targets between the Standards and the Guidelines, for example for water deprivation. Water deprivation targets are inconsistent across the Standards and the Guidelines in Part A and B (examples, SB 3.1, 3.2, GB 3.4, 3.5 and SB 4.1, GB 4.6, GB 4.7, GB 4.8 and GB4.9), where in several instances the Guidelines require a reduced water deprivation time than the Standard or alternatively a longer journey time that does not meet the Standard (GB4.4). Further, some guidelines indicate several different (and conflicting) water deprivation times (eg GB4.6 and GB4.7).

Aside from the obvious difficulty for both industry and the regulators to determine the appropriate “guidance” and practice in order to fulfil the standards, these contradictions detract from the credibility of the document without explanation of the obvious welfare benefits/risks associated with these different times. While standard SA5.2 attempts to provide this guidance, the document remains complex in terms of defining appropriate water deprivation targets. Additionally, some species (ie sheep GB11.7) have guidelines permitting an extension to the water deprivation times, whereas others do not, even in the event of an emergency.

3) Definitions

There are several areas relating to definitions that need to be addressed to ensure consistency within and across Part A and B of the document. The following areas of definition require consideration:

- a) Key definitions relating to the Standards: such as “fitness for the intended journey”. Specific examples are provided in the section below.
- b) Wording definitions: such as the issue of “transport vs delivery” and “journey” vs “water deprivation time”. Across the document there are some instances where these terms are confused and need consideration to ensure that the Standards can be followed in practice. For instance, GB4.3 requires that calves should not be transported for a time exceeding 10 hours (or 500 km) and GB4.15 requires that calves be delivered within 10 hours, which is not the timeframe in practice (assembly, loading, unloading time). Another example is SA4.1 where the water deprivation time and journey are required to be less than 4 hours. In this instance, “journey” should perhaps be removed as it will differ from water deprivation time. Further, some Part B chapters refer only to journey time in the Standards (GB4.3), with the guidelines referring to water deprivation time of 4 hours.
- c) The definition of bobby calves: The definition of calf refers to cattle less than 6 months old and while there is also a definition for bobby calf (not accompanied by mother and less than 30 days old) it is not clear in some Standards (SB4.4, SB4.5,

SB4.6, SB4.7) which calves the Standards relate to. For instance, GB4.8 should include “calves”, as the definition allows up to 6 months and this is not covered when specified to be between 5 and 30 days as in GB4.9.

There are several definitions in the document that reference bobby calves: 1) calves between 5 and 30 days, 2) calves under 1 month, 3) calves under 30 days, 4) calves less than 30 days. AMIC suggests these should reflect a single set of agreed wording and refer to calves being transported for sale and/or slaughter (eg SB4.5 GB4.3, GB4.4). Furthermore, the definition of bobby calves should align with the NVD (under 6 weeks) and the AQIS guidelines that are currently adhered to within the industries and required by trading partners.

SPECIFIC COMMENTS RELATING TO THE STANDARDS IN PART A

Standard 1: Responsibilities and Planning

In principle, AMIC supports SA1.1 and SA1.2. The Standards, requiring a journey plan and emergency contacts (SA1.2), are important to the welfare of livestock travelling longer distances and the transfer of information relating to the condition and care of livestock is also critical towards a whole of chain approach.

SA1.1 Duty of Care

While AMIC considers the definition of duty of care very valuable, it is a definition and unlikely to be enforceable as a standard (duty of care to meet these standards). Nevertheless, defining duty of care is integral to safeguarding welfare and ensuring consistent and enforced standards, and as such, AMIC suggests that this standard be directly reflected consistently in all State regulations where existing duty of care definitions reside. It is imperative that this definition, if to be regulated, is reflected consistently and replaces existing definitions within the jurisdictions. If this is not considered, there is a risk that the interpretation of the various duty of care statements will potentially differ, resulting in confusion on ‘who is responsible’.

Standard 2: Stockhandling Competency

SA2.1 Competency

AMIC supports the Standard SA2.1 which is aimed at achieving good animal welfare outcomes through appropriate management and handling of livestock by people in the

industry. These principles are important towards safeguarding animal welfare across the production chain. Furthermore, AMIC supports the efforts made in the document to define competency in a manner that is achievable and that can be applied across all livestock sectors towards continual improvement in animal welfare. One consideration, however, is that the definition of competency (definitions section) provides a different explanation to the explanation provided in the guidelines (GA2.2), where GA2.2 requires evidence of previous experience and the definition of competency does not.

Standard 3: Transport vehicles and facilities for livestock

AMIC supports Standard SA3.1 as written in the documentation, recognising that the condition of vehicles is an important consideration towards safeguarding animal welfare during transport.

Standard 4: Pre-transport selection of livestock

AMIC considers that the principles relating to the assessment of livestock that are fit to travel is a key consideration for animal welfare, thus SA4.1 is supported by AMIC. The following, however should also be noted:

SA4.1 Fit for the intended journey

The provisions presented for “fit for the intended journey” in SA4.1 differ from the definition. The definition of “fit for the intended journey” in the documentation does not include “known to be” when referring to pregnancy and additionally adds that “following the intended journey, they (livestock) can recover their normal biological state in a reasonable time”. AMIC notes that when assessing whether people have abided by the provisions for “fit for the intended journey” any assessment of whether livestock “have recovered” post transport in relation to fitness alone will be difficult and may be influenced by other factors, including transport duration, weather conditions, and the environment provided post-unloading for rest and recovery. The Standard (SA4.1) does not contain these statements, but includes “known to be” on the basis of deliberations within the SRG. Terms that are defined might also be presented with quotation (“...”) to ensure consistent interpretation.

One other consideration for the above is SA4.1 vi) relating to pregnancy. AMIC notes that there are different targets set out in the document with regard to the interaction of pregnancy and water deprivation time. For instance, Part B reflects water deprivation times for animals that are pregnant excluding the last 4 weeks (eg. SB4.1), last 2 weeks (eg. SB11.1) and some not at all (eg. SB9.1), with Part A reflecting standards for those within 2 weeks (eg. SA4.1), resulting in a gap (no target) for the animals

between their last 4-2 weeks gestation and in some instances, referring to a journey time only (eg. SB4.3).

Furthermore, Part A requires that livestock must not be within 2 weeks of pregnancy unless being transported property to property under 4 hours duration (eg. SA4.1). however Part B (eg.SB4.3) requires that transport within the last 4 weeks must only be conducted with veterinary advice, unless under 4 hours duration with no mention of property to property as seen in Part A.

Standard 5: Loading, transporting and unloading of livestock

AMIC supports Standard 5, recognising that key handling, loading and unloading practices are presented towards ensuring good animal welfare outcomes.

AMIC notes, however, that SA5.1 suggests that “if the maximum time off water is reached, livestock must be provided with water, food and rest before starting another journey” and suggests that the Standards need to reflect the type of spell (eg mandatory spell requires water, lying space and food, or voluntary spell which involves a minimum of 4 hours, access to water and space to lie). By specifying the type of spell required throughout the document, the risk of different interpretations is reduced. The current wording indicates that the spell (eg. SA5.1, SB1.3, SB3.3, SB4.2) is a mandatory spell and reads essentially as both a maximum feed and water deprivation time for all species.

AMIC notes that SA5.3 is mildly contradictory in suggesting that “loading density must be assessed for each pen or division in the livestock crate or container, based on average liveweight of the intended livestock loading” while also requiring that “loading density must consider all the following factors (ie more than liveweight).

AMIC also notes that SA5.5 might read iii) “level of aggression is likely to cause injury to other livestock” as segregating on the basis of general “level of aggression” is not likely to be achievable in all instances in practice.

Standard 6: Humane destruction

AMIC supports SA6. AMIC notes that whilst blunt trauma is permitted for several species (under 24 hours), this is not reflected in the species chapters in every instance (SB2.7) and the general provision also allows this for horses (foals) which may need some consideration.

SPECIFIC COMMENTS RELATING TO THE STANDARDS IN PART B

B4 Specific requirements for the land transport of cattle

Minimum age for the transport of bobby calves for sale and/or slaughter

In previous submissions, AMIC has requested that the age at which calves (bobby calves destined for sale and slaughter) are loaded for transport should be reviewed. This request was submitted on the basis that age is a key limiting factor for the welfare of calves being transported and more rigorous policy to safeguard animal welfare is required.

The AMIC bobby calf committee have reviewed the issues relating to calf welfare during transport, including the requirements on farm that contribute to the welfare of calves being transported. A review of the literature was carried out to assist the committee in their deliberations and the establishment of AMIC policy with regard to bobby calf welfare. This comprehensive study can be provided upon request.

AMIC considers that the existing standards relating to bobby calves in the current LTS draft do not reflect sufficient provisions to safeguard calf welfare. AMIC requests that the following comments be considered:

- a) Support of Option B1 in the RIS. While it is understood that there are costs associated with increasing the calf age, the current RIS does not adequately reflect the costs and benefits associated with reduced mortality (losses), improved carcass yield (from higher liveweight) and other meat quality/processing benefits, aside from the costs associated with feeding and management on farm.
- b) AMIC recommends that the age of calves (8 days) be considered prior to the finalisation of the LTS and a response is sought from AHA to AMIC on the outcome. AMIC also notes that the current guideline GB4.4 that attempts to raise the age to 8 days still requires review in light of the journey time of 24 hours. This journey time supersedes the Standards (SB4.1 – 18 hours water deprivation time) and would result in a longer water deprivation time (ie 24 hour journey time specified only).

In relation to specific standards, AMIC suggests the following:

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 rearing properties and is less than 6 hours duration.

AMIC recommends that the above standard should reflect the previous requirements of both the Code of Practice and the NVD, specifically including provisions for:

- calf age (the above standard does not require that calves actually be between 5 and 30 days of age and therefore this would not be a basis by which a person could be at fault (ie not meet the standard). The current provision requires that “calves between 5 and 30 must...” rather than “calves must be between 5 and 30 days of age”.
- calf liveweight (and additionally include revision of the target liveweight for Freisians and Jerseys in a similar manner to the Tasmanian and New Zealand standards);
- umbilical cord status - this currently only resides in the guidelines, however is part of the NVD and an important measure in practice. While there are arguments that the cord is unsuitable as a measure of age, without a requirement for dairy producers to keep records of the date calves are born, there is no other means of verifying age in practice. What might need to be included is further specification of the status of the cord (ie not raw, pink, fleshy) to ensure improved interpretation.
- feeding requirements – calves should be fed within 6 hours of transport, rather than just a document identifying last feed
- stocking density targets (these were in previous drafts and are available in the Tasmanian and New Zealand Standards, however consideration must be given to the commercial densities together with the guideline requiring calves to lie down)
- calf handling practices; some guidance would be useful if presented in a similar manner to the information presented in the Pig species chapter) and to bring the provisions in line with the current Code of Practice for Livestock at Slaughtering Establishments (ie dogs not for calves less than 30 days old should perhaps be the same as prodder use as in previous Codes, where both prodders and dogs should not be used on animals less than 3 months of age).

AMIC also considers that there is a need for:

- more rigorous standards relating to induced calves (fitness prior to loading).

- the standards to reflect a requirement for calf age and define the provisions for those calves travelling for sale and/or slaughter.
- advice to be sought from Governments on the methods being considered for verification of the LTS in relation to calf age.

Part B – all chapters (all species)

Feeding Guidelines

AMIC notes that several chapters still reflect that livestock should be fed and watered as soon as possible after unloading (ie GB4.8, GB2.7, GB5.8, GB11.6). While it is important that livestock, especially those travelling long distances, are fed and have the time to recover from transport, the standards in Part B relating to spells when water deprivation limits are reached provides this requirement. Furthermore, the current guideline provisions for feed are inconsistent with the food safety requirements for processors that stipulate curfews. AMIC notes that the guidelines would be more clear and supportive of the standards and other standards across the production chain if they mirrored the more applicable wording presented in the Pig species chapter. This example, as previously discussed in the LTS enables livestock to be scheduled for slaughter as required. The pig chapter reads “*Upon unloading, pigs should be fed and watered within 24 hour intervals in accordance with the relevant standards for production, saleyard, feedlot and processing sectors*”. AMIC recommends that this approach be taken for all species.

Contingencies including exceeding water deprivation times

The sheep chapter contains Guideline GB11.7 stating “Under cold conditions, in southern Australia, time off water should only be extended under the following conditions: 1) weather conditions are considered to be a welfare risk due to wind chill hypothermia, 2) sheep are assessed to be fit for the remainder of the journey, 3) the additional time off water is spent on a stationary vehicle or in a facility and 4) a document states the location, date and start/finish times of the delay.

AMIC supports the need to have a contingency, however believes this should be presented as a Standard for several species. With no contingency in the Standard, the reality of this is that, under certain climatic and other conditions, the result will be either:

- People forced to break the law and then run the gauntlet of being prosecuted,
or
- People forced to break the law and if prosecuted spend un-recoupable time and money defending their case in court, or

- People, in a bid to prevent breaking the law, abide by the letter of the law, which under certain conditions may result in a negative animal welfare outcome, and again a cost.

AMIC also considers that in previous drafts (eg. April 2007) and SRG meetings, the need for a contingency plan was originally a standard for all species (within SA1.1-1.2) and that requiring a contingency plan for any delay to water deprivation/journey is important. Examples of these delays might also include tyre blow-out, truck breakdown or rollover.

SPECIFIC COMMENTS RELATING TO THE REGULATORY IMPACT STATEMENT (RIS)

The RIS contains the following options:

- *Option A: Encourage the development of industry codes, QA programs etc (i.e. the minimum intervention option);*
- *Option B: the proposed standards;*
- *Option B1: the proposed standards with a variation to standard SB4.4 changing the minimum age for transport of calves for slaughter (other than to a calf-rearing facility) to 8 days rather than 5 days;*
- *Option C: more outcome-based and less prescriptive standards;*
- *Option D: less expensive standards i.e.. the most costly standards to become guidelines;*
- *Option E: more expensive standards i.e. higher standards relating to maximum time off water for particular species/class of species and a minimum voluntary spell of 6hrs to earn an equivalent time-off-water credit; and*
- *Option E1: more expensive standards i.e. higher standards relating to maximum time off water for particular species/class of species and a minimum voluntary spell of 12hrs to earn an equivalent time-off-water credit.*

For a true assessment of the viability of the Options presented in the RIS, an assessment of the costs relating to Guidelines that may form part of the regulations, but that are not considered in the RIS in accordance with COAG guidelines, should be completed.

Furthermore, by defining the base case for the purposes of the economic analysis as 'mandatory' Codes, there is little information provided on the costs relating to the implementation and delivery of 'mandatory standards' therefore AMIC is concerned that the costs to industry relating to the implementation of these Standards are currently underestimated.

It is understood that AMIC policy is for calves to be a minimum of 8 days prior to being transported for sale or slaughter. Upon presenting this policy view to AHA and SRG, there was reasonable agreement and commitment to providing a policy option in this process that would be presented in the RIS for calves to be 8 days of age (Option B1).

AMIC members are concerned that in the RIS, Option B1 was not clearly presented to enable a policy decision to result from public consultation. AMIC previously recommended that the Standards documentation placed for public consultation contain the two options upfront in the cattle chapter (SB4.5 covering calves 5 to 30 days to be expanded / repeated for 8 to 30 days) to clearly present the two standards (Options) in a transparent manner.

Additionally, AMIC previously recommended that the RIS reflect a clearer explanation of Option B1 and the basis for the policy decision (ie 5 vs 8) and include the wording for each alternate Standard in the paragraph, together with an assessment of the welfare costs and benefits of the issue and the financial impact on Industry from a public perception, consumer and market access perspective. It is recognised that not all of these costs are able to be accounted for in real terms, however an assumption should be made to objectively present the issue for decision. Additionally, data (\$) relating to the transfer of cost/benefit from the dairy industry to the meat industry (including mortalities, meat quality, liveweight value) should be included.

FURTHER COMMENTS ON SPECIFIC STANDARDS

Document reference	Standard wording	AMIC Recommendations for the public consultation phase
Scope	<p>The standards apply to all those responsible for the care and management of livestock that are transported, including: drivers, transport companies, owners, agents and livestock handlers at farming enterprises, depots, saleyards, feedlots, and livestock processing plants. The chain of responsibility for livestock welfare in transport begins with the owner or their agent, and extends to the final receiver of the livestock.</p> <p>Other statements further on in the document that relate to scope</p>	<p>Page 1 under Scope should be combined with some of the statements on Page 3 & 4 to reflect:</p> <ol style="list-style-type: none"> i. the scope of land transport from a welfare perspective (ie “begins before the physical journey”) – additionally page 3 & 4 repeat this and refer to the person(s) responsibility which should perhaps be reflected in Page 1. ii. The scope of the “transport process” iii. The scope of the actual standards (point of x and the people involved, species) iv. The scope with regard to other standards.
	<p>Guidelines — The recommended practices to achieve desirable animal welfare outcomes. The guidelines complement the standards, are advisory, and are intended to provide a basis for good livestock welfare practices.</p> <p>The guidelines set out livestock welfare outcomes that can be used in quality assurance programs and by those seeking best practice for livestock transport. They should be used as guidance and describe a superior livestock welfare outcome additional to the standards. Guidelines use the word ‘should’.</p>	<p>AMIC suggestion: revert to the previous definition of the guidelines agreed to in SRG1. The guidelines should be “designed to support, underpin and provide explanation or guidance to the standard or define practices not covered in the standards”.</p> <p>Without clear definition of the standards and guidelines and their roles, the document will be difficult to apply in practice. In particular, guidelines will not be able to be used as a defence when they are of a higher standard to “the standard”.</p> <p>April LTS version defined the guidelines more appropriately: The Guidelines are designed to complement the Standards and be advisory in nature. They are intended to provide a basis for good husbandry practices that underpin and assist in meeting the requirements of these Standards. Additional and alternative practice information that results in good animal outcomes is also presented in the Guidelines.</p> <p>Recent drafts continue to indicate that the guidelines should be a higher standard than the standard – this is a guideline definition issue should be considered.</p>
SA1.1	<p>A person in charge must exercise a duty of care to ensure the welfare of livestock under their control and compliance with the livestock transport standards.</p> <p>The responsibility for livestock welfare in the transport process is:</p> <ol style="list-style-type: none"> i) the consignor for the mustering and assembling of livestock ii) the consignor for the handling, preparation, including 	<p>AMIC suggestion: That this standard be moved into the scope of the document.</p>

Document reference	Standard wording	AMIC Recommendations for the public consultation phase
	<p>selection as 'fit for the intended journey', feed and water provision and holding periods before loading the transporter for the loading, journey and unloading including selection as 'fit for the intended journey' and additional inspections of livestock and spelling periods. the receiver after unloading.</p> <p>iii)</p> <p>iv)</p>	
SA1.2	<p>For a journey reasonably expected to exceed 24 hours, there must be one or more documents that accompany the livestock and that specify:</p> <p>i) the date and time that the livestock last had access to water</p> <p>ii) the date and time of livestock inspections and any livestock welfare concerns and actions taken</p> <p>iii) emergency contacts.</p> <p>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.</p>	<p>AMIC acknowledges that it is important to communicate the water deprivation time and responsibility. Its is unlikely that the National Vendor Declaration system that underpins food safety in the Australian red meat industry would be altered to meet the documentation requirements of the Land Transport Standard.</p> <p>Thus if another document is required (ie passport for consignments/consignment sheets/waybills) then other questions should be considered in the process and RIS. ie) will agents, saleyards and processing establishments be expected to maintain and store these consignment documents and verify them? What are the likely costs associated with this and what should be the recording mechanism introduced to deliver these requirements?</p> <p>Suggest alternative: For journeys anticipated to exceed 24 hours, a recorded journey plan must be developed as part of existing consignment documentation that defines;</p> <ul style="list-style-type: none"> - the times animals are without water and feed, - inspection times; - other contingencies including those specified for standard 1.2 <p>Or Suggestion – (example May LTS draft) replace with previous wording Std 1.2 “As part of the system for each journey, there must be arrangements in place to manage any delay, breakdown or other emergency”</p> <p>The above may be more feasible to fit within consignment sheets / TruckCare and existing waybills and if the requirement is simply to ‘communicate these times’ rather than extend documentation across the chain, it is more likely to be achieved and less costly.</p>

Document reference	Standard wording	AMIC Recommendations for the public consultation phase
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	GA2.2 and the definitions section is different, where one requires evidence (records) of previous experience and the definition of competency does not, which will create conflict in terms of interpreting any legislated standard. Suggest that the elements of competency listed in the definition of competency are removed (from the definition) and checked to be covered in the guideline (GA2.1) – (ie guidance only) – they do not cover all areas of competency in a definition. GA2.1 to be changed from “should include” to may include – depends on the task ie humane destruction is not a “should” necessarily for all people involved in livestock transport.
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 iii) not showing visible signs of severe injury or distress iv) free from conditions that are likely to cause increased pain or distress during transport v) not blind in both eyes vi) not known to be, or visually assessed not to be, within 2 weeks of parturition, unless the water deprivation time and journey duration is less than 4 hours duration.	Current conflict with cattle chapter: SB4.3 Cattle known to be more than 8 months pregnant must be transported under veterinary advice unless the journey is less than 4 hours duration. Suggest change “known to be or visually assessed” or “8 months and within 2 weeks (part A)” as these can be interpreted differently. Furthermore, if the concept is to have the SA4.1 cover all species is there a need to repeat in cattle chapter – it is not currently repeated in the other species chapters (ie sheep more than x months not transported for more than 4 hours) – other species chapters have guidelines to manage this issue rather than a specific standard ? Suggest that a provision be included under the fit to load provisions “and in accordance with the species specific standards” to alert personnel to any additional fitness requirements.
SA4.2	Any livestock judged as not fit for the intended journey must only be transported under veterinary advice.	The issue here is whether a phone call would constitute veterinary advice and secondly, whether veterinarians would be able to provide this advice on the phone without observing the animal. See below ‘judged’ vs assessed.
SA4.3	The consignor must only supply livestock that are assessed as fit for the intended journey.	AMIC comment: Fit for the intended journey in this instance must be in quotation marks (“...”) if it refers to the definition in the appendix. The definition of fit for the intended journey currently contradicts the definition provided in SA4.1 and contains an additional clause of “being able to recover in a reasonable period of time” which cannot be demonstrated by either producer (consignor) or transporter. SA4.2 “judged” and SA4.4 assessed.

Document reference	Standard wording	AMIC Recommendations for the public consultation phase
SA4.4	Where livestock are assessed as not fit for the intended journey before loading, a person in charge must make effective arrangements for the care, appropriate treatment or humane destruction of weak, ill or injured livestock at the first opportunity	AMIC comment: "Making arrangements" must consider taking action to call for assistance as in practice, the transport operator or other agent may not be able to provide care, treatment or humane destruction. Calling for assistance is not considered as a management option in GA4.4.
GA4.9 and note	Time off water.	This should be moved to the next chapter under water deprivation.
SA5.1	If the maximum permitted time off water is reached, livestock must be provided with water, food and rest before starting another journey	AMIC comment: Outcome based standard although will be difficult to verify in practice. The water deprivation time definition and the mandatory spell definition does not require that food and rest be provided. This needs to be made clear for this standard to be met (ie either the provision of food and water to be included in a mandatory spell – when maximum times are reached so that this standard SA5.1 and the similar species standards (ie SB4.2) reflect the intent.
SA5.2	Time off water must be managed to minimise risk to the welfare of the livestock according to: i) the increased risk to livestock welfare of longer journeys up to the permitted maximum time off water ii) assessed fitness of the livestock for the remainder of the intended journey iii) predicted climatic conditions, especially heat or cold iv) class of livestock, especially if weak, pregnant, recently having given birth, lactating or immature nature of the intended journey.	This standard will be difficult to enforce and is already repeated in the species specific guidelines (ie GB4.1). This might be better reflected in the contingency requirements (ie if water deprivation times are exceeded or need to be reduced).
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 standard is slightly contradictory in that it suggests loading density should be assess on average liveweight, and then refers to the need to assess loading density on a variety of other factors listed (ie not just liveweight).
SA5.5	Livestock must be segregated by sufficient internal partitions or other means to minimise risk to the welfare of other livestock	AMIC comment: Segregating by "level of aggression" should be changed to : "level of

Document reference	Standard wording	AMIC Recommendations for the public consultation phase
	based on: i) species, class and size ii) level of fitness iii) level of aggression iv) nature of the intended journey.	aggression if this is likely to cause injury or harm to other livestock” otherwise “aggressive” livestock would need segregating (ie bulls) but in practice they settle when penned together or with other sex (ie males + females). As per previous AMIC comments, the decision to segregate livestock should be left to the discretion of the carrier, depending on their animal husbandry competency.
SA5.12 SA5.13, SA 5.15	5.11 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. 5.13 The person receiving the livestock must make arrangements for separating weak, ill or injured livestock for rest and recovery, appropriate treatment, humane destruction and disposal of dead stock. SA5.15 Where there is a road accident involving the transport vehicle, all livestock must at the first available opportunity be: i) assessed, in the standing position if possible; ii) removed for treatment, or humanely destroyed at the accident site . [AMIC comment this would be the course of action for any injured or severe welfare problem]	AMIC comment: 5.12. This is outside the scope and covered under other legislation. Suggest 5.12 /5.11 be combined to read: ie “Weak, ill or injured livestock must be identified to the person receiving the livestock for action to be taken to treat, separate for rest and recovery or humanely destroy as required” as per previous drafts - post SRG 3 [9/7/07]. The above is more suitable to the scope of the document, as the requirement for the processor to separate for rest, recovery (etc) does not relate to the carrier and is covered by other Codes and legislation (ie export and domestic requirements). 5.14 (i) how would this be achieved (standing position)? 5.14 (ii) this would be the action for any injured or ill livestock and if a road accident, will probably depend on emergency personnel decisions Comments made in SRG indicated a preference for “contingency planning” that covers action in all emergencies ie road accidents and other issues such as tyre change, breakdown etc, all of which require action to safeguard animal welfare.
GA5.34, GA5.37	During a voluntary spell, in addition to water and space to lie down, livestock should be provided with the following additional provisions: <ul style="list-style-type: none"> • access to appropriate food if there is time to eat and rehydrate • enough space for exercise • separation appropriate to the travel group. Where livestock have been transported for extended periods, or are special classes of livestock, longer spell periods should be provided.	The note defining spells should come before this section. GA5.34 defines spells differently (ie the following additional provisions) to the definition in the note and in the definitions section. Needs clarification. GS5.37 should be defined as a mandatory spell?
GA5.46	In the case of an emergency, where an unexpected substantial delay has arisen during the journey, time off water may be extended, provided that: <ul style="list-style-type: none"> • it is in the best welfare interests of livestock to be transported 	This is a reflection of the previous sheep standard (60 hours), attempting to indicate where water deprivation time is extended. This should be included in a separate standard, together with the other statements that relate to contingency / emergencies (ie 5.15, 5.2).

Document reference	Standard wording	AMIC Recommendations for the public consultation phase
	<ul style="list-style-type: none"> the reason, location, date, start and finish times of the delay is recorded. 	<p>The wording needs review: it is not in the best interests that water deprivation be extended, it is in the best interests that transport be completed – ie should read “the extension enables the journey to be completed as soon as possible, or a delay/rest stop avoids further risk to animal welfare.</p>
GA5.48	<p>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.</p>	<p>Should specify that downer livestock must not be dragged while sensible.</p>
SA6.7	<p>Blunt trauma to the brain must only be used on specified newborn livestock less than 24 hours old or piglets up to 15 kilograms liveweight, and must be followed by an effective procedure to ensure death.</p>	<p>This standard does not carry through to all species chapters (ie buffalo).</p>
SA6.9	<p>Lethal injection is an approved method for all species but must be performed by a veterinarian or an approved person</p>	<p>Approved persons requires a definition</p>



AUSTRALIAN MEAT INDUSTRY COUNCIL

ABN 65 990 653 488

Processor Group
Level 2, 460 Pacific Highway
St Leonards NSW 2065
Australia

P O Box 1208
Crows Nest NSW 1585

Contact Details:

Stephen J Martyn
National Director - Processing

Telephone: (02) 9086 2242
Facsimile: (02) 9086 2201
Email: smartyn@amic.org.au

www.amicprocessors.org.au

