



14-16 Brisbane Avenue
Barton ACT 2600
PO Box E10
Kingston ACT 2604

Telephone: (02) 6273 3088
Facsimile: (02) 6273 4479
Email: sca@sheepmeatcouncil.com.au
Website: www.sheepmeatcouncil.com.au

By Email: consultation@animalwelfarestandards.net.au

27 May 2008

Animal Welfare Standards Public Consultation
PO Box 196
DICKSON ACT 2602

To whom it may concern

Re: Submission to Animal Health Australia: Livestock Land Transport Standards

Sheepmeat Council of Australia (SCA) is the nation's peak body representing the national interests of lamb and sheepmeat producers in Australia. SCA appreciates the opportunity to provide a submission to the Australian Standards and Guidelines for the Welfare of Animals, Land Transport of Livestock public consultation process.

Enhancing animal welfare is a key priority for the Australian sheepmeat industry. SCA strongly supports the Australian Animal Welfare Strategy (AAWS) and the process of developing new Australian Standards and Guidelines for the Welfare of Animals - Land Transport of Livestock. Essential to the success of the new standards and guidelines, is the need to ensure they are consistently legislated and implemented nationally.

SCA supports the majority of the standards and Option B of the Regulatory Impact Statement. SCA seeks that the standards be practical for industry to implement, result in acceptable animal welfare outcomes and wherever possible, should be science based.

Thank you for the opportunity to provide a submission to the Land Transport of Livestock Standards and Guidelines on behalf of Australian sheepmeat and lamb producers. Please do not hesitate to contact Sheepmeat Council of Australia (02 6273 3088) should you require any further information.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'B. Sullivan'.

Bernie O'Sullivan
Executive Director

Australian Standards and Guidelines for the Welfare of Animals

Land Transport of Livestock

Public Consultation Submission

Sheepmeat Council of Australia

May 2008

14 – 16 Brisbane Ave
BARTON ACT 2600
T: (02) 6273 3088
F: (02) 6273 4479
www.sheepmeatcouncil.com.au

Introduction

The Sheepmeat Council of Australia (SCA) is the nation's peak body representing and promoting the national and international interests of lamb and sheepmeat producers in Australia.

Enhancing animal welfare is a key priority for the Australian sheepmeat industry. SCA strongly supports the Australian Animal Welfare Strategy (AAWS) and the process of revising the current Model Codes of Practice for the welfare of animals into clear standards and guidelines. The Australian Standards and Guidelines for the Welfare of Animals - Land Transport of Livestock, are the first standards and guidelines to be developed under the revised process. Essential to the success of the new standards and guidelines, is the need to ensure they are consistently legislated and implemented nationally.

General Comments

SCA is generally supportive of the objectives of the Land Transport of Livestock Standards and Guidelines. This submission highlights particular standards that SCA continues to strongly support and explains the rationale for this support. Key areas of support include retaining the maximum time off water at 48 hours for sheep greater than 4 months of age, and that the loading density table GB11.8 in the sheep section remains as a guideline to help achieve the general loading density standard.

Although there are a number of unresolved issues outlined in Appendix 8 of the Regulatory Impact Statement (RIS), SCA would like to highlight that the revision of the Land Transport Codes has required a number of compromises throughout the process, which will impact on industry practice and will result in costs to industry.

Further, the RIS estimates that the proposed standards will cost the sheep industry approximately \$10 million per annum not including the unquantifiable costs. It outlines that the incremental annual cost as a percentage of annual total cost of transport to be 6.58 - 6.71% for the sheep industry and it is estimated that this will result in a 1.99 - 2.03% increase in retail price of sheepmeat product, which is estimated to decrease consumer demand for sheepmeat by 2.79% to 2.85%.

National Consistency

The issue of national consistency and implementation of the Standards and Guidelines for the Land Transport of Livestock, is an essential element of this process that must be addressed. Industry involvement in the standards

development process has demonstrated its willingness to improve the welfare of Australian livestock; however the states and territories must continue their obligation of national consistency in legislation and implementation of the Standards and Guidelines.

Consultation

Throughout the standards and guidelines development process and the public consultation period SCA has consulted with and sought advice from:

- SCA Councillors (lamb and sheepmeat producers who represent each sheep producing state of Australia);
- State Farm Organisations;
- a range of sheepmeat producers; and
- Meat and Livestock Australia (the sheepmeat industry's research and development company).

Part A General Standards and Guidelines for the Transport of Livestock

1. Responsibilities and Planning

SCA supports the objectives of section 1- *Responsibilities and Planning*.

Standards

SCA supports the standards SA1.1 and SA 1.2 as they are written in the Public Consultation Version (Version 29 February 2008).

For sheep producers to comply with SA 1.2, SCA trusts that they will be able to use the National Vendor Declaration (Sheep and Lambs) section relating to 'hours off feed and water before transporting' to communicate information to the transporter, therefore fulfilling their responsibility of communicating the water and feed provision. It is important that existing industry documents, such as the NVD, can be used to comply with this standard.

Guidelines

SCA is concerned about the large number of guidelines and the amount of duplication within them. SCA recommends the following changes to the Guidelines in section 1:

- **GA 1.2** outlines that *'the livestock consignor is responsible for the livestock until they are loaded onto the transport vehicle.'* However standard **SA 1.1** **does not** include the consignor being responsible for the loading but the transporter being responsible *'for the loading'* under SA 1.1 iii).

The principles between the standards and guidelines must be consistent. Therefore **GA1.2** should be changed to read:

GA1.2 *'The livestock consignor is responsible for the livestock until they are to be loaded onto the transport vehicle.'*

- **GA 1.3** i) should include: *'being competent in their tasks and key activities to meet the provisions of these standards and guidelines.'*
- **GA 1.4** iii) should include: *'handling and managing livestock in accordance with the provisions specified in these standards and guidelines.'*
- **GA 1.8** is not required and should be deleted as it is sufficiently covered by GA 1.3 ii) and GA2.1 iv).

- **GA 1.15** is not required and should be deleted as it is sufficiently covered by GA 1.3 xi).

2. Stock Handling Competency

SCA supports the objectives for section 2- *Stock Handling Competency*.

Standards

SCA supports standard SA2.1 as it is written in the Public Consultation Version (Version 29 February 2008).

Guidelines

SCA recommends the following changes to the Guidelines for section 2:

- **GA 2.1** *'Elements of competency for each phase of the livestock transport process should include:'*
- In **GA 2.2**, SCA **does not** support evidence of competency needing to *'include the following:*
 - records of on-the-job training
 - relevant records of experience
 - recognised training and staff training registers
 - induction training
 - supervisor sign-off for specific tasks'

Firstly, supporting evidence of competency should not require all of the listed elements. However supporting evidence could require one or more of the elements outlined. Secondly, records should not be required to demonstrate relevant experience. SCA would be satisfied if this guideline read:

- GA2.2** *'Supporting evidence of competency should include any of the following:*
- records of on-the-job training
 - relevant ~~records of~~ experience
 - recognised training and staff training registers
 - induction training
 - supervisor sign-off for specific tasks'

The above changes are consistent with the LTS Glossary (Appendix 1) *Competency* definition on page 88.

This is also consistent with the OIE Guidelines for the transport of animals by land (Appendix 3.7.3) which outlines Competence in Article 3.7.3.4. as *'1. All people responsible for animals during journeys, should be competent according to their responsibilities listed in Article 3.7.3.3. Competence may be gained through formal training and/or practical experience.'*

3 Transport Vehicles and Facilities for Livestock

SCA supports the objectives for section 3- *Transport Vehicles and Facilities for Livestock*.

Standards

SCA supports standard SA3.1 as it is written in the Public Consultation Version (Version 29 February 2008).

Guidelines

SCA has no recommendations for the guidelines in section 3.

4 Pre-Transport Selection of Livestock

SCA supports the objectives for section 4- *Pre-transport selection of livestock*.

Standards

SCA supports the standards in section 4 as they are written in the Public Consultation Version (Version 29 February 2008).

It is important that visual assessment remain as an approved method of assessment, particularly for pregnancy.

Guidelines

- **GA4.6** - At the Standards Reference Group meeting 6, it was agreed that GA 4.6 (previously a standard) be removed from the document. SCA supports that GA 4.6 be removed.
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5 Loading, Transporting and Unloading Livestock

SCA recommends the following change to the objective for section 5 - 'Loading, Transporting and Unloading':

'Livestock are handled, loaded, transported and unloaded in a manner that minimizes risks to livestock welfare. ~~Livestock recover their normal biological state within a reasonable time after arrival.~~' The words 'recover their normal biological state within a reasonable time' are too subjective.

Standards

SCA supports the standards outlined in section 5 of the Public Consultation Version (Version 29 February 2008), with the following comments:

- **SA5.2** sufficiently highlights areas that need consideration when determining water deprivation times for each species. Therefore SCA supports the maximum water deprivations as they are outlined in the sheep specific standards (Version 29 Feb 2008). The concept of the "normal" and "extended" water deprivation times from the previous transport MCOP are not required.
- **SA5.7** - SCA supports the use of electric prodders if used judiciously and sparingly. Therefore supports the compromise and restrictions on the electric prodder use, as detailed in SA5.7. It should also be noted that SA 5.7 ii) that '*Electric prodders must not be used on livestock under three months of age*' is of a higher standard than the OIE Guideline in Article 3.7.3.7.3.
- **SA 5.8** - SCA supports the compromise on when dogs should be muzzled, as detailed in SA 5.8.

Guidelines

SCA recommends the following changes to the Guidelines:

- For **GA 5.12**, the reference to '*dogs that bite should be muzzled*' should be removed as it is covered by the standard **SA 5.8**. SCA suggests the following change:

'Dogs should be appropriately trained to move livestock and be responsive to commands. ~~Dogs that bite should be muzzled at all times when working livestock.~~ Dogs should be provided with water and rest after working.'

- **GA 5.19** *'where there is concern about the assessment of fitness to load, veterinary advice should be sought'* is not required as this is sufficiently covered by the standard **SA 4.2** where *'any livestock judged as not fit for the intended journey must only be transported under veterinary advice'*
- **GA 5.24** regarding ventilation is not required as this is covered under the standard **SA 3.1 ii**).
- **GA 5.29** should also include *'stopping the vehicle where appropriate, to reduce wind chill factor'*

6 Humane Destruction

SCA supports the objectives for section 6- *Humane Destruction*.

Standards

SCA supports standards in section 6 as they are written in the Public Consultation Version (Version 29 February 2008).

Guidelines

SCA has no recommendations for the guidelines in section 6.

Part B Species Standards and Guidelines for the Transport of Livestock

B11 Specific Requirements for the Land Transport of Sheep

Standards

SCA supports the standards in section B11 as they are written in the Public Consultation Version (Version 29 February 2008). The following comments outline the rationale for SCA's support.

- **SB 11.1 - Time off Water**

SCA strongly supports the water deprivation times outlined in SB11.1. SCA believes that there is no need to include a 'normal' and 'extended' time as previously outlined in the Draft Land Transport of Sheep MCOP. The additional considerations for a longer journey are already adequately addressed throughout the standards. For example, SA 5.2 sufficiently outlines that *'Time off water must be managed to minimize risk to the welfare of the livestock according to:*

- i) the increased risk to livestock welfare of longer journeys up to the permitted time off water;*
- ii) assessed fitness of the livestock for the remainder of the intended journey.'*

Also regardless of journey length, SA 5.11 outlines *'that the driver must inspect livestock within the first hour of the journey and then at least every three hours or at each rest stop'*. Therefore, from 36 to 48 hours the animals will be inspected at least 4 separate times. Finally under SA 5.14, *'the driver must make arrangements or take action during extreme hot or cold conditions to minimize the risk to the welfare of livestock.'*

In the sheep species specific section, GB11.1 also outlines the considerations that should be made for long distance travel of sheep.

Research conducted by CSIRO Livestock Industries, *Ferguson & Fisher et al* (2007) supported that sheep *"in good physiological condition can cope with periods of up to 48 hours of food and water deprivation without any major deleterious affect to their welfare."*

The permitted time off water of 48 hours for Australian sheep is not unique when looking at other international codes for transport. For example the *Recommended Code of Practice of the Care and Handling of Farm Animals –Transportation* (Canadian Agri-Food Research Council 2001) has stipulated a maximum transport time of 48 hours for sheep (Table 4 on page 13) and 5.5.2 outlines that *"Total time in transport and lairage during which the animals have not received feed and water from the*

premises of origin to final destination, should not exceed 52 hours for cattle, sheep and goats”.

Guidelines

SCA recommends the following changes to the Guidelines:

- **GB 11.7 – Cold Conditions**

SCA recommends that GB11.7 should be a standard as the aim of the animal welfare standards is to improve the animal welfare outcomes of livestock being transported. If the livestock have been off water for a period that is approaching the maximum deprivation times, and cold conditions prevail, the transporter should stop the vehicle to reduce the wind chill and subsequent cold stress on the animals. The driver may be required to break the law (standard SB11.1) to ensure that the livestock’s welfare is not compromised. Having a guideline to use only as a defence is not adequate.

As outlined in ‘GB11.7 iii) the additional time off water is spent on a stationary vehicle or in a facility’ clearly restricts additional time to be a benefit to the livestock in a stationary vehicle (not for the driver to have extra time to get the animals to their destination). Also the additional document in ‘GB11.7 iv) a document states the location, date, start and finish times of the delay’ clearly allows the additional time to be audited and verifiable.

- **GB 11.8 - Loading Densities**

SCA strongly supports GB11.8 and the minimum space allowance remaining as a guideline (as distinct to a standard), particularly considering the minimum space allowance table for sheep is calculated based on wool length, live weight and no horns. This guideline can be used to assist livestock producers and transporters to achieve part of standard SA 5.3.

The minimum space allowance for sheep should be determined with consideration of many variables (as outlined in SA 5.3) including the class of animals, size and body condition, wool length, horn status, climatic conditions and the nature of the intended journey. Therefore more variables need to be considered than outlined in the table in GB 11.8.

The OIE Guidelines for the transport of animals by land (Appendix 3.7.3) also highlights the range of variables associated with determining loading density. For example Article 3.7.3.5. outlines:

6 g) *‘Other factors which may influence space allowance include:*

- i) Vehicle/container design*
- ii) Length of journey*
- iii) Need to provide feed and water on the vehicle*
- iv) Quality of roads*
- v) Expected weather conditions*
- vi) Category and sex of the animals.’*

- GB 11.9 should have the following amendment: *‘The above stocking densities represent the minimum area that should be allowed for a group of sheep or lambs that have an average live weight as specified and in half wool. The floor area allowed for each animal should increase as wool length increases or may decrease for newly shorn sheep. An increased area per animal should also be allowed where sheep are horned.’*

Regulatory Impact Statement

SCA supports the need for the Regulatory Impact Statement (RIS) for the Australian Standards and Guidelines for the Land Transport of livestock.

SCA has concerns with the following elements of the RIS:

1. Base Case

On page vii, the RIS outlines that *“the term ‘base case’ means the situation that would exist if the proposed standards were not adopted... The base case includes the relevant state and territory animal welfare legislation...It also includes all relevant existing model codes of practice”*. SCA disagrees that the base case should include all relevant existing model codes of practice (MCOP).

The current MCOP are intended as models to enable states to develop codes of practice to meet their individual needs and are intended as a guide for people who are involved in transporting livestock.

SCA believes that the costs of the proposed standards are not adequately reflected in the RIS because of the base case assumption using MCOP if the proposed standards were not adopted. The RIS explains *‘At present, the model codes of practice are referenced in uneven or different ways in the various state/territory animal welfare Acts and Regulations’* therefore MCOP should not be used to form the base case.

2. RIS Options

SCA supports *‘Option B: the proposed standards’* based on the animal welfare outcomes and that the *‘expected costs are considered to be outweighed by the expected benefits’*.

In regard to Option E and E1, SCA has not been provided with any science or evidence of improved animal welfare outcomes from increasing the minimum voluntary spell periods to 6 or 12 hours. SCA would be concerned about increasing the minimum spell period without demonstrated benefits for the animals, as this would potentially prolong the overall transport process and depending on the facilities where the animals are unloaded, may increase the potential stressors to the animals.