



Submission to

**Australian Standards and
Guidelines for the Welfare of
Animals
Land Transport of Livestock**

May 2008

The Victorian Farmers Federation

The Victorian Farmers Federation is Australia's largest state farmer organisation, and the only recognised, consistent voice on issues affecting rural Victoria.

The VFF represents 19,000 farmer members, representing 15,000 farm enterprises. The VFF consists of an elected Board of Directors, a member representative General Council to set policy and eight commodity groups representing dairy, grains, livestock, horticulture, chicken meat, pigs, flowers and egg industries.

Farmers are elected by their peers to direct each of the commodity groups and are supported by Melbourne-based staff.

Each VFF member is represented locally by one of the 230 VFF branches across the state and through their commodity representatives at local, district, state and national levels. The VFF also represents farmers' views on hundreds of industry and government forums.



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1 Introduction

Thank you for providing the VFF with an opportunity to comment on the proposed standards and guidelines. The VFF wishes in being involved in the consultation process surrounding this and future standards and guidelines.

Below are the comments the VFF wishes make in regard to the sections of the proposed standards that are concern to the VFF. Most of these recommendations and comments are consistent with the comments being presented by Peak Agricultural Commodity Councils of which the VFF is a member.

Costs and benefits

- **Compliance Costs**

The Regulatory Impact Statement (RIS) identifies the cost of introducing the proposed standard as follows:

'The quantifiable cost over 5 years (in present value terms) represents between 4.97% and 5.11% of the total cost of livestock transport of approximately \$2.84b and \$3.14b. The estimated change in retail meat prices would entail approximately a 1% increase for beef, a 2% increase for lamb, a 0.3% reduction for pork and a 4.8% increase for chicken'.

The above analysis is simplistic in that it assumes that these extra costs will be spread equitably between participants in the supply chain and the consumer. In reality the majority of producers are competing in the global marketplace, are price takers and will therefore be unable to pass these costs onto consumers. Therefore producers are likely to bear the entire cost.

The RIS also fails to acknowledge the increased compliance costs producers will be burdened with when the standards are eventually incorporated into State legislation and programs which are likely to involve audit requirements etc.

- **Enforcement costs**

The VFF believe that since the animal welfare standards are based on community expectations, the community, through the state and federal government's should make a significant contribution towards achieving these standards. Farmers will inevitably bear the immediate costs associated with meeting the proposed standards, however it is inequitable to expect farmers to also bear the enforcement and auditing costs associated with the standards.

Utilising the many industry QA programs to enforce the standards may be responsible; however this must not be used as a means for governments to avoid enforcement costs. Industry QA programs are expensive to run and added costs will be incurred through the incorporation of the Animal Welfare Standards into audits.

Where an industry QA program performs an individual audit of the Animal Welfare Standards, the government must contribute to that QA program the cost it would have otherwise incurred by performing the audit internally.

Animal welfare approaches

The RIS correctly states the difficulties in defining "animal welfare" and lists 2 possible approaches to managing animal welfare issues;

- 1.2.2.1 The 'five freedoms' approach
- 1.2.2.2 Scientific approaches

The VFF favours the scientific approach to animal welfare which aims first and foremost to maximise animal health, before considering if there is scientific evidence to suggest that animal welfare is being impinged, and if improvements are possible. The scientific approach relies less on ethics (which can be vague and subjective) and more on science and measurable outcomes.

The RIS presents seven options for managing animal welfare.

- 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 SB4.5 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 leading to possibly greater choice in ways to satisfy the standards;
- Option D: less expensive standards i.e. the most costly standards to become voluntary guidelines;
- Option E: more effective standards for livestock welfare that will incur a higher cost to livestock industries i.e. higher standards relating to maximum time off water for particular species/class of species and a minimum voluntary spell of 6 hours to allow recognition of the spell period as a credit in the total water deprivation time calculation;

- Option E1: more effective standards for livestock welfare that will incur a higher cost to livestock industries i.e. higher standards relating to maximum time off water for particular species/class of species and a minimum voluntary spell of 12 hours to allow recognition of the spell period as a credit in the total water deprivation time calculation.

The VFF supports option B (the proposed standards), provided some important changes (outlined below) can be incorporated into the document.

The other option outlined will generally require higher standards for maximum time off water, spell times and will incur higher costs to livestock industries.

Responsibility

No.	Standard	Comments
SA 1.2	For journeys > 24 hours there must be a document that includes times without water, inspection times, other relevant information, and emergency contacts accompanying the livestock. Person transferring responsibility for livestock must communicate relevant information to the next person in charge.	The two documents most used will be the NVD or the transporter's consignment sheet. Information not on the NVD should be on the consignment sheet. No new documents are required. The aim is to avoid additional and unnecessary paperwork.
GA 1.2	"The livestock consignor is responsible for the livestock until they are loaded onto the transport vehicle."	GA 1.2 outlines that the consignor is responsible for loading however; Standard SA 1.1 does not include the consignor being responsible for loading. Recommend change: "GA 1.2 The livestock consignor is responsible for the livestock for the earlier of: until they are to be loaded onto the transport vehicle or until the transporter or the new owner begin handling the animals."

Stock-handling and competency

No.	Standard	Comments
SA 2.1	All persons involved with livestock to be competent or supervised by a competent person.	The VFF agree that stock handlers should be competent. However with chronic skill-shortages particularly in rural areas it is unrealistic and inefficient to require staff to undertake formal training and/or education before handling livestock. Increasingly all industries are moving away from traditional training models and moving towards on the job training which incorporates recognition of prior learning.
GA 2.2	"Supporting evidence of competency should include the following: records of on-the-job training relevant records of experience	Evidence of competency should not need to include all of the listed evidence in GA2.2. and relevant experience should not need to be recorded. Recommend change:

	<p>recognised training and staff training registers induction training supervisor sign-off for specific tasks.”</p>	<p>“GA2.2 Supporting evidence of competency should include <u>any of</u> the following:</p> <ul style="list-style-type: none"> • records of on-the-job training • relevant <u>records of</u> experience • recognised training and staff training registers • induction training • supervisor sign-off for specific tasks.”
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Pre-transport preparation

No.	Standard	Comments
SA 4.1	<p>Livestock must be assessed as fit for the intended journey at every loading. An animal is fit for a journey if it is:</p> <ul style="list-style-type: none"> 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 is less than 4 hours duration to another property. 	<p>Visual assessment must be recognised as an appropriate assessment method, particularly for pregnancy.</p>
GA 4.4	<p>Effective management of livestock considered not fit for the intended journey should include, but is not restricted to:</p> <ul style="list-style-type: none"> • effective containment in a suitable holding area • rest • provision of shelter, feed and water • veterinary treatment • humane destruction. 	<p>The current wording implies that all the provisions listed are appropriate for an animal considered not fit for transport.</p> <p>Adding “options for” makes the guideline clearer e.g. humane destruction will not necessarily be the answer for an unfit animal.</p> <p>Recommend change:</p> <p>Effective management <u>options for</u> livestock considered not fit for the intended journey should include, but are not restricted to:</p>

		<ul style="list-style-type: none">• effective containment in a suitable holding area• rest• provision of shelter, feed and water• veterinary treatment• humane destruction.
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Loading, Transport and Unloading

No.	Standard	Comments
OBJ. 5	“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”	<p>The term “recover their normal biological state within a reasonable time after arrival” is very broad and too subjective.</p> <p>Recommend change: “Livestock are handled, loaded, transported and unloaded in a manner that minimizes risks to livestock welfare”.</p>
SA 5.9	Drivers must ensure that the ramp and the vehicle are properly aligned and that any gap between the ramp and the vehicle is sufficiently narrow to avoid causing injury during loading and unloading.	<p>Recommended change; Drivers must ensure that the ramp and the vehicle are properly aligned and that any gap between the ramp and the vehicle is sufficiently narrow to <u>minimise the risk</u> of injury during loading and unloading.</p> <p>Using the term ‘minimise’ instead of ‘avoid’ makes the language used throughout the document more consistent.</p>
GA 5.19	Where there is concern about the assessment of fitness to load, veterinary advice should be sought.	This guideline is already covered by SA 4.2 where any livestock judged as not fit for the intended journey must only be transported under veterinary advice.
GA 5.34	<p>During a voluntary spell, in addition to water and space to lie down, livestock should be provided with the following additional provisions:</p> <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. 	The guideline contradicts the note on the following page which recommends feed should not be provided during short spells of less than 12 hours.

GA 5.47	<p>Effective management of livestock considered not fit for the intended journey should include, but is not restricted to:</p> <ul style="list-style-type: none"> - effective containment in a suitable holding area - rest - provision of shelter, feed and water - veterinary treatment - humane destruction 	<p>The way the guideline is currently worded implies that all the provisions listed are appropriate for an animal considered not fit for transport. Adding "options for" makes the guideline clearer e.g. humane destruction will not necessarily be the answer for an unfit animal.</p> <p>Alternative Wording</p> <p>Effective management options for livestock considered not fit for the intended journey should include, but are not restricted to:</p> <ul style="list-style-type: none"> - effective containment in a suitable holding area - rest - provision of shelter, feed and water - veterinary treatment - humane destruction
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Humane destruction

No.	Standard	Comments
SA 6.2	Humane destruction by competent person using approved method at first opportunity.	<p>The term "competent" must include experienced but not necessarily formally trained people.</p> <p>In situations where a competent person is not available, strict adherence to this standard is likely to prolong the pain and suffering inflicted on injured animals, while a competent individual is found.</p>

Cattle Specific Standards

No.	Standard	Comments
SB4.1	<p>Time off water must not exceed the time periods given below:</p> <p>Cattle over 6 months old - 48h Calves 1–6 months old - 24h</p> <p>Lactating cows with calves at foot - 24h</p> <p>Calves 5–30 days old travelling without mothers - 18h</p> <p>Cattle known to be more than 6 months pregnant excluding the last 4 weeks - 24h</p>	<p>The VFF is concerned with the provisions for calves 5 – 30 days old travelling without mothers.</p> <p>The requirement of a prescribed maximum time off water is not relevant as this Class principally covers bobby calves whose diet is exclusively milk or milk replacer. It is recommended that the term “calf feed” which is defined in the glossary, be included in parenthesis adjacent to the maximum time off water specified for this class under Standard SB4.1. Alternatively the provision for calves 5 – 30 days old travelling without mothers should be deleted from SB4.1 because it is redundant given it is repeated in SB4.5 ii).</p> <p>The maximum time off water (calf feed) of 18 hours is not consistent with common and acceptable industry practice that calves are fed once daily (i.e. maximum interval between feeds of 24 hours). Industry recommendations for feed management of calves on farm includes feeding calves of this age once daily and experience has shown that there are no adverse animal welfare outcomes for these calves. It should also be noted that the Victorian code of accepted farming practice for the welfare of cattle also provides that calves should be fed at least once every 24 hours. This provision is also supported by research studies on the effects of food withdrawal and transport on 5- to 10- day old calves which found no detrimental effects after 30 hours on the metabolism of healthy and clinically normal calves (Todd et al. 2000. Res Vet Sci 68: 125-134.). It is recommended that the maximum time off water (calf feed) for calves 5 – 30 days old travelling without mothers be changed to 24 hours (similar change is also recommended for SB4.5 ii).</p> <p>The VFF recognises that the welfare of bobby calves is important and is working actively with other members of the bobby calf supply chain to improve the handling and efficiency of transport from farm to slaughter in order to consistently meet current transport recommendations. It is important that the proposed Standards and Guidelines are achievable and realistic for the bobby calf supply chain. The bobby calf supply chain has been working to minimise travelling time through efficient aggregation arrangements which may be compromised if</p>

		<p>the maximum time off feed is unnecessarily restrictive. Decreasing the maximum time off water (calf feed) to 18 hours would have a huge impact on the bobby calf supply chain that is not adequately covered in the RIS. If this change is not made, the RIS would be seen to be in error.</p>
SB4.4	<p>Calves less than 5 days old travelling without mothers must only be transported directly to a calf-rearing facility and must:</p> <ul style="list-style-type: none"> 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. 	<p>This Standard provides for very young calves (less than five days) for transport exclusively for rearing unlike the provisions for calves between 5 and 30 days old which includes transport to saleyards and for slaughter. It is important that the arrangements for transporting very young calves to dedicated calf rearers is retained to maximise animal management practices and animal welfare outcomes.</p> <p>It is appropriate that this Standard includes more detailed requirements due to the vulnerability of these very young calves.</p>
SB4.5	<p>Calves between 5 and 30 days old travelling without mothers must:</p> <ul style="list-style-type: none"> 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. 	<p>The Regulatory Impact Statement (RIS) includes Option B1 which varies from Standard SB4 by changing the minimum age for transport of calves for slaughter (other than to a calf rearing facility) to 8 days rather than 5 days.</p> <p>The costs to the bobby calf industry of Option B1, as identified in the RIS, of an additional \$60 million over five years are substantial and likely to have major impacts on the industry with no guarantee that animal welfare outcomes will be improved. The first week of rearing is a critical period for development and changes to the digestive system with consequential animal health risks. Whilst they may be larger and easier to drive, calves of eight to ten days of age are more susceptible to gastro-intestinal illness and infections.</p> <p>In addition, the VFF is concerned that the RIS does not adequately address the full costs to the industry should there be a requirement for farmers to retain calves until they are at least 8 days of age before sending them to slaughter compared to the 5 days of age requirement as is current practice. These include; the extra capital infrastructure required on farm; additional costs of losses of calves due to disease; and potential costs as a result of occupational health and safety issues for handlers. In addition, it is expected that there will be an increase in the number of calves which will be destroyed on farm increasing environmental and biosecurity implications for carcase disposal.</p>

		<p>SB4.5 ii) is redundant if SB4.1 above remains and should be deleted (see comments SB4.1 above). If SB4.5 ii) is retained then the VFF recommends that the maximum time off water for calves between 5 and 30 days old travelling without mothers is increased from 18 hours to 24 hours since last feed (see comments SB4.1 above).</p> <p>SB4.5 iii) The VFF does not support SB4.5 iii) because as it is currently drafted an auditable and accessible record will not contribute to improved animal welfare outcomes as it is unlikely to be available to all participants in the bobby calf supply chain. Current Codes of Practice require calves to be fed within six hours of collection for transport. In this situation calf transporters can confidently manage on-going duty of care of the calf during subsequent transactions and transport to ensure that the maximum time off water (calf feed) is not exceeded.</p> <p>The VFF recommends that this Standard SB4.5 iii) be deleted and replaced with the following:</p> <p>SB4.5 iii) be fed on the farm within 6 hours of transport.</p>
GB4.3	<p>Calves should be transported for the shortest time possible. Efficient aggregation practices for calves between 5 and 30 days old should be used to reduce journey times to final destinations. Direct marketing should be used when possible. Calves should not be consigned through saleyards that do not have holding facilities suitable for calves. They should not be transported for a time exceeding 10 hours, or a distance exceeding 500 kilometres — whichever comes first — from loading to the destination, unless the calves are intended for slaughter and exceeding this time and distance is necessary to reach the nearest available, operating, livestock-processing establishment.</p>	<p>It is recommended that GB4.3 be deleted and replaced with the following:</p> <p>GB4.3 Calves should be transported for the shortest time possible. Efficient aggregation practices for calves between 5 and 30 days should be used to reduce journey time to final destination. Direct marketing should be used when possible. Calves should not be consigned through saleyards that do not have holding facilities suitable for calves. Where possible, calves should be sent to the nearest available, operating, livestock-processing establishment.</p>

GB4.4	Calves between 5 and 30 days old travelling without mothers should have dry, withered navel cords and hooves that are not soft and bulbous. They should not travel until they are 8 days old for journeys approaching 24 hours.	It is recommended that GB4.4 be deleted. The VFF does not support GB4.4 as the state of navel cords and hooves are only two of several imprecise indicators of age. In addition, the recommendation that calves should not travel until they are 8 days old for journeys approaching 24 hours conflicts with SB4.5 and would cause confusion.
GB4.7	Transport of pregnant animals	The VFF recognises that special provisions are required for the transport of pregnant cows and supports GB4.7 because animals are frequently transported close to parturition to allow closer supervision of calving.
GB4.10	Loading Density	<p>Loading density is a useful tool to provide guidance on the space allowances for animals during transport. However, basing loading density on liveweight does not take into consideration the range of factors that contribute to animal comfort and well-being during transport and it is not appropriate that it is mandated as a Standard.</p> <p>The space allowances for livestock 30-200 kg liveweight are not included in the table. This section needs to be completed. If this is not possible it is recommended that the rows be deleted from the table. The VFF recommends that no changes to this table be adopted without consideration of the affected parties such as members of the Standards Reference Group.</p>
GB4.14	Ramps	The VFF supports the first sentence of GB4.14 but recommends that the second sentence defining ramp angles is unnecessarily prescriptive and recommends it be deleted.
GB4.15	Delivery time	The VFF recommends that GB4.15 be deleted. These provisions are not consistent with the comments of SB4 and inclusion of a range of different times from the Standard leads to confusion and are not justified.

Pig Specific Standards

No.	Standard	Comments
SB 9.4	Electric prodders must not be used on pigs.	In many situations loading pigs without the use of prodders can be significantly

		<p>more stressful for the pigs than when prodders are used in an appropriate and restrained way.</p> <p>Eg. A pig that is blocking a race can cause many others pigs to jam in behind, one tap with a prodder will move the pigs on without the need to stress the whole group.</p> <p>In other loading situations the use of prodders is unnecessary and has been phased out. However the complete banning of prodders may have detrimental effects.</p>
SB9.5	<p>Approved methods for humane destruction are:</p> <p>i) for pigs are firearm aimed in the frontal or temporal position, captive bolt aimed in the frontal position</p> <p>ii) for piglets less than 15 kilograms are blunt trauma, firearm, captive bolt or lethal injection.</p>	Grammar and structure problems.
GB 9.1.i	<p>Health conditions that could cause pig welfare to decline during transport and should be considered unfit for transport include any of the following:</p> <p>i) lameness conditions where a pig can place weight on all legs</p>	Avoiding or delaying travel is not appropriate in many situations. Often the best outcome for a pig of slaughter weight is to transported and slaughtered as soon as possible.
GB 9.2	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.	Transport of cull sows (i.e. not pregnant) should be on the same basis as pigs in general except for the extra space allowance as directed in the schedule.
GB 9.8	In hot weather, strategies should be considered to minimise heat stress and avoid windburn and sunburn. As a guide, 5% fewer pigs should be loaded in very hot weather.	Management of the timing of transport on hot days is more important than reducing numbers in the pen. Stock handlers routinely avoid heat stress in animals through techniques such as the use of shade cloth to protect pigs from direct light, and hosing down pigs before the commencement of the journey.
GB 9.11	The loading ramp should be appropriate to the vehicle and allow optimal movement of pigs. Ideally, ramps should be 900–1000 mm wide and 20 degrees or less in slope.	Loading pigs, particularly without the use of electric prodders, can require a ramp of up to 1500mm in width. The stock manager is the best person to judge the appropriate ramp width for their stock, because ease of loading is in the interests of the stock manager as well as the welfare of the pigs.
GB 9.12	The space between the pig and the roof or upper deck should be sufficient to allow clearance at the top of the	VFF support decision not to mandate deck heights.

	rump.	
GB 9.14	When handling or moving pigs, stockpersons should use their body position.	Wording is clumsy and vague. Could be removed.

Poultry Specific Standards

No.	Standard	Comments
SB10.1	Time off water must not exceed the time periods below: Poultry 24 hours.	The large majority of poultry movement in the broiler industry is less than 3 hours (from farm to processing plant). Less stringent standards and regulations should be introduced for this type of poultry movement which poses a much lower risk than a long distance journey e.g 6-24 hours.
SB10.5	Poultry with broken legs or poultry that are unable to walk must not be transported.	While it is clearly inappropriate to transport poultry with broken legs, in some cases it may be beneficial to allow poultry managers the option of transporting to slaughter, birds who are unable to walk, provided it is a short journey (eg less than 1 hour) and the density of birds in crates is appropriately reduced. As written the standard will force poultry managers to humanely destroy chickens which could otherwise be safely transported to slaughter, given some appropriate precautions.
SB10.26	When removed from cages, end-of-lay hens should be held either firmly around the body or by both legs, not be a single leg, which could cause injuries. A breast support slide should be used for end-of-lay hens	There is no scientific evidence that a breast support slide gives any benefit over any other way of removing the birds from a cage. This sentence should be removed.

Sheep Specific Standards

No.	Standard	Comments						
SB 11.1	<p>Time off water must not exceed the time periods given below:</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 60%;">Sheep over 4 months old</td> <td style="text-align: right;">48 hours</td> </tr> <tr> <td>Lambs under 4 months old</td> <td style="text-align: right;">28 hours</td> </tr> <tr> <td>Ewes known to be more than 14 weeks pregnant</td> <td></td> </tr> </table>	Sheep over 4 months old	48 hours	Lambs under 4 months old	28 hours	Ewes known to be more than 14 weeks pregnant		<p>The maximum water deprivation times in SB11.1 are appropriate</p> <p>The water deprivation time of 48 hours for adult sheep is supported by scientific research conducted by CSIRO. The 48 hours also includes any curfew time pre-loading.</p>
Sheep over 4 months old	48 hours							
Lambs under 4 months old	28 hours							
Ewes known to be more than 14 weeks pregnant								

	excluding the last 2 weeks” 24 hours	
SB 11.2	If sheep over 4 months old have been off water for 48 hours, they must be spelled for 36 hours before starting another journey.	Recommended change: If sheep over 4 months old have been off water for 48 hours, they must be spelled a minimum of 24 hours before starting another journey. Comment The research undertaken by CSIRO on behalf of MLA does not adequately address this standard. The research indicates that following a 24 hour rest period sheep had recovered most metabolic indicators yet did not test if they could cope with another transport event of up to 48 hours.
SB 11.3	Approved methods of humane destruction for: i) sheep are firearms, captive bolt, lethal injection or bleeding out; bleeding out by neck cut must only be done by a competent operator and in situations where there is no firearm or captive bolt available. ii) lambs are firearms, captive bolt lethal injection, bleeding out or blunt trauma; bleeding out by neck cut must be done by a competent operator and in situations where there is no firearm or captive bolt available; blunt trauma must only be used for lambs that are less than 24 hours old and where there is no firearm or captive bolt available.	Recommended change: Approved methods of humane destruction for: i) sheep are firearms, captive bolt, lethal injection or bleeding out; bleeding out by neck cut must only be done by a competent operator <u>or under direct supervision of a competent operator</u> , in situations where there is no firearm or captive bolt available. ii) lambs are firearms, captive bolt lethal injection, bleeding out or blunt trauma; bleeding out by neck cut must be done by a competent operator <u>or under direct supervision of a competent operator</u> , in situations where there is no firearm or captive bolt available; blunt trauma must only be used for lambs that are less than 24 hours old and where there is no firearm or captive bolt available.
GB 11.7	“Under cold conditions in southern Australia, time off water should only be extended under the following conditions: i) weather conditions are considered to be a welfare risk due to wind chill hypothermia	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 breach

	<ul style="list-style-type: none"> ii) sheep are assessed to be fit for the remainder of the intended journey iii) the additional time off water is spent on a stationary vehicle or in a facility iv) a document states the location, date, start and finish times of the delay." 	standard SB11.1 to ensure that the livestock's welfare is not compromised.
GB11.8	Loading densities table	Due to the number of variables associated with transporting sheep such as wool length, live weight, horns, climatic conditions etc. it is recommended that GB11.8 remain a guideline only.

Summary

The VFF would welcome the opportunity to discuss the positions outlined above.