

**Animal Health Australia**  
**Public Consultation Submission to the**  
**Australian Animal Welfare Standards and Guidelines for the**  
**Land Transport of Livestock**

Animal Health Australia (AHA) has managed the project and makes the following submission primarily to facilitate corrections and clarifications that have arisen.

AHA believes that consultation with a broad range of stakeholders when drafting the standards and guidelines has improved the relevance of the standards to the community and to livestock industries. AHA believes that the standards represent an overall, incremental improvement in livestock welfare and provide a clear focus for further research and future efforts to improve livestock welfare.

AHA notes that some stakeholders continue to have a language difficulty with the use of the word 'guideline' and the relationship of the guideline clauses to the standards. This issue has arisen in part because of a different relationship between standards and guidelines in some other regulatory systems, most notably food safety legislation arrangements. The guidelines in the draft are not constructed to be 'under pinning' but are meant to describe a better welfare standard than the acceptable defined standards, as described in the introduction of the document.

AHA notes that the following areas may require further attention by stakeholders to develop effective standards that result in positive livestock welfare outcomes. A longer list of Reference Group member concerns (the 'unresolved issues') has been published as part of the consultative process;

- SB4.5 bobby calf provisions
- Spelling during time in temporary destinations
- Dragging provisions (recommendations made)

Amendments to certain standards and guidelines in attachment one are proposed to clarify the existing drafts, including the addition of omissions. AHA does not suggest that these proposals are only in the category of minor changes and recognises that further discussion by the reference group may be necessary.

AHA submits a correction to the Regulation Impact Statement – Case Example Two in attachment two.

Kevin de Witte

Animal Health Australia.

27 May 2008.

**Attachment One.**

Reference	Proposal and justification
SA5.6	<p>SA5.6 Livestock must be handled in a manner that is appropriate to the species and class and does not cause pain or injury. Specifically:</p> <ul style="list-style-type: none"> <li>i) livestock (excluding poultry) must not be lifted off the ground by only the head, ears, horns, neck, tail, wool, <u>hair</u> or feathers</li> <li>ii) livestock must not be lifted off the ground by a single leg except in the case of all poultry, and sheep, goats and pigs if they are less than <u>three months old or 15 kilograms live weight</u></li> <li>ii) <u>Mechanical lifting must ensure that the livestock is adequately supported</u></li> <li>iv) _____ livestock must not be thrown or dropped</li> <li>v) livestock must not be punched, kicked, or struck <u>in a unreasonable manner by hard or sharp instruments including lengths of metal piping, sticks or belts</u></li> <li>vi) <u>Recumbent livestock must not be dragged, except for the shortest possible distance and in a reasonable manner, to allow safe handling, lifting, treatment or humane destruction.</u></li> </ul>
SA5.8	<p>Dogs must be under control at all times during loading, transporting and unloading livestock. Dogs must not be transported in the same pen as livestock <u>with the exception of bonded guardian dogs</u>. Dogs that habitually bite; deer, goats, pigs, poultry, sheep and raites, must be muzzled.</p>
SA6.2	<p>Humane destruction must be carried out:</p> <ul style="list-style-type: none"> <li>i) on moribund <u>or severely injured</u> livestock</li> <li>ii) by a competent person or under direct supervision of a competent person</li> <li>iii) using an approved method for the species</li> <li>iv) at the first opportunity.</li> </ul>
SB1.2	<p><u>Journey time may be extended to 72 hours for all alpacas only under the following conditions:</u></p> <ul style="list-style-type: none"> <li>i) <u>alpacas must be watered and fed on the vehicle at all times</u></li> <li>ii) <u>there must be space for all alpacas to sit down or 'cush'</u></li> </ul>

**Comment [KdW1]:** Relevant for manes, some species.

**Comment [KdW2]:** Weight is the underlying issue and is more verifiable.

**Comment [KdW3]:** New clause to cover mechanical lifting of large stock.

**Comment [KdW4]:** Require words to state the harmful extent of the action

**Comment [KdW5]:** These examples are not necessary and not inclusive.

**Comment [KdW6]:** Dragging standard. Recumbent means lying. Does not include dragging animals that are on their feet or rumps.

**Comment [KdW7]:** Exemption for maramma's etc.

**Comment [KdW8]:** Moribund does not include animals with gross limb injuries or other severe injuries that may arise.

SB3.x	Camel bulls in rut must be segregated during transport.
GB4.10	Delete blank rows of table – agreed data not available.
GB4.20	Cattle should be bled out using the thoracic stick method.
<b>Definitions</b>	
spelling, spell or spelling period — voluntary	<p>A spell may occur voluntarily before loading, mid-journey or at the completion of a journey.</p> <p>Water and space to lie down must be provided to all livestock, on a stationary vehicle or off a vehicle. Food and shelter may also be provided. A mid-journey spell must be a minimum of 4 hours to be recognised for the provision of water and rest.</p> <p>Where animals are unloaded, a spell starts from the time all animals are unloaded and ends when animals are handled for reloading. The time used for spells of longer than 4 hours during the journey will not be included in the calculation of the total time off water. A spell less than 4 hours duration is not recommended or recognised for water deprivation time calculation, but can be undertaken as necessary.</p> <p>Where livestock are voluntarily spelled for 24 hours with food, any subsequent journey can be considered as a new water deprivation period.</p> <p>A spell does not include time spent in curfew.</p>
Time off water	When water is not reasonably accessible for livestock. Equivalent to <i>water deprivation time</i> . Time off water is cumulative from the first livestock handling or curfew, unless livestock are given reasonable access to water. During transport this minimum reasonable access period is four hours.
water deprivation time	<p>The total time animals are deprived of water, including during mustering away from water, yarding and water curfew time before transport, loading, time on the vehicle whether moving or stationary unless reasonable access to water is provided, and time during unloading and holding at the destination until reasonable access to water is provided.</p> <p>Where a voluntary spell exceeds four hours, the time that water is provided to livestock during the spell can be added to extend the total time of the trip within the permitted maximum time off water if the livestock meet the fitness requirements.</p> <p>See <i>Time off water</i></p>
yearling horse	Horse older than first registered birth date.

**Comment [KdW9]:** Bulls in rut can be extremely aggressive.

**Comment [KdW10]:** Recommendation based on physiology of cattle.

**Comment [KdW11]:** Clarification, excludes preloading and end of journey (mandatory) spells.

**Comment [KdW12]:** Clarification, the spell now includes rest, water and food to be eligible to start another journey. Mandatory spells include all these elements.

**Comment [KdW13]:** Reasonable access to water on a property is a management decision. During transport livestock are faced with unfamiliar circumstances and other stressors that may deny them an opportunity to drink.

**Comment [KdW14]:** Clarification using the notion of the 'clock stops'.

**Comment [KdW15]:** Not required.

## Attachment Two.

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LTS RIS Update/ correction 14/5/08

### Case Example 2

Day 1: 420 kg live weight (LWT) steers (about 2 years old) are mustered from a paddock into a holding yard where they are held on water over night.

Day 2: Drafted, subject to primary fitness to travel inspection, and returned to a holding paddock or tailed out on feed and water overnight and most of the next day (>24 hours).

Day 3: On feed and water during day and yarded in evening (7 pm), and fed hay but kept off water.

Day 4: Loading at 5am next day (10 hour curfew). All animals re-inspected in yard and during loading for fitness. Loading takes 30 to 40 minutes per vehicle, and the last truck in a 800 head consignment would leave at about 8 am. Property to Winton depot yards in Queensland is 1,050 km or about 15 hours driving in a 6 deck unit. Cattle would arrive at about 11pm. Cattle unloaded on feed and water at end of day 4 (takes 20 minutes).

Day 5: Cattle remain on feed and water until next loading.

Day 6: Overnight on food and water, load at first light at 5 am (overall 29.7 hours break on feed and water with no curfew). All animals inspected for fitness before and during loading. Loading will be onto a different truck and livestock details must include time off water as the anticipated journey length will be over 24 hours.<sup>1</sup> The last truck would depart at 8 am from Winton to Mitchell in southern Queensland which is 800 km and takes 11 to 12 hours.<sup>2</sup> Need to cross-load last trailer to a 4 deck unit and unhitch last trailer to comply with Roads and Traffic Authority (RTA) rules (Type 2 road train to a type 1 road train) which takes 1 hour. Transfer of livestock details to new truck which proceeds to destination. Driver has 4 to 5 hours rest stop whilst remaining cattle remain on truck.

**Comment [KdW16]:** Mistake corrected – 20 minutes to unload (0.3 hours) leaving 40 minutes which has been rounded up to 0.7 of an hour.

**Comment [KdW17]:** This journey will only be compliant with the proposed standards if the mid-journey curfew is cut back to 5 hours thereby providing a spell with food exceeding 24 hours to permit the second leg of the journey. It is believed that this additional stock handling for a short curfew will be unlikely to occur within these time frames and the proposed mid-journey curfew period would not occur.

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<sup>1</sup> With no curfew and the mid-journey spell over 24 hours or longer on feed and water, the subsequent journey will be considered as a new journey and not a continuing journey. Access to feed does not have to be recorded. Spells are to exceed 4 hours to be counted.

<sup>2</sup> Drivers have 16 hours of working hours under Livestock Transporters Association of Queensland

(LTAO) rules for advanced fatigue management on day one, 12 hours work on day two, and must meet the weekly limit for driving hours. Time spent by livestock on a stationary truck during a driver rest stop, with no access to water, does not count as a spell.

Day 7: Journey recommences in early am for last 370 km to feedlot which takes 5 hours for a daylight unload at approximately 7 am which takes 20 minutes.

Using the outer estimates for the last truck of cattle for the total transport process:

- Total time in transport process with water management implications (starts with water curfew on day 3) = 84.3 hours (day 3 1900 - day 7 07.30 hours).
- Total time off water during journey process = 54.6 hours (10 curfew + 3 load + 15 drive + 0.3 unload + 3 load + 12 drive + 1 cross load + 5 rest + 5 drive + 0.3 unload). (48 hours permitted in the draft standards, therefore a 24 hour mid journey spell required).
- Total spell times with water (and feed in this case) during journey process = 29.7
- Water deprivation times = 28.3 (10 + 3 + 15 + 0.3) and 26.3 (3 + 12 + 1 + 5 + 5 + 0.3) hours
- Times on trucks and off feed = 18.3 (3 + 15 + 0.3) and 26.3 hours ( 3 + 12 + 1 + 5 + 5 + 0.3).

**Comment [KdW18]:** A spell with food longer than 24 hours, allows the second leg of the journey to be undertaken compliant with the proposed standards.

**Comment [KdW19]:** The original example deducted the mid-journey spell time of 19.4 hours from the WDT. The intention is that the 'water deprivation time clock stops' and a compliant spell of over four hours duration is deducted from the total transport process time – not the actual water deprivation time which is cumulative unless a 24 hour spell with food is provided as in this example, ie the water deprivation time clock is not turned back during a spell less than 24 hours..

Full compliance with the proposed 'Australian Standards and Guidelines for the Welfare of Animals – Land Transport of Livestock'.

**DAILY ACTIVITY PLAN**

<u>Day/start time</u>	<u>Activity</u>	<u>feed</u>	<u>water</u>	<u>Cumulative Water Deprivation Time (hours)</u>
<u>Day 1</u>	<u>muster</u>	<u>yes</u>	<u>yes</u>	
<u>Day 2 0500</u>	<u>draft</u>	<u>no</u>	<u>no</u>	
<u>1200</u>	<u>hold</u>	<u>yes</u>	<u>yes</u>	
<u>Day 3</u>	<u>hold</u>	<u>yes</u>	<u>yes</u>	
<u>1900</u>	<u>yarded</u>	<u>yes</u>	<u>not after 1900</u>	<u>5</u>
<u>Day 4 0500</u>	<u>load</u>	<u>no</u>	<u>no</u>	<u>10</u>
<u>0800</u>	<u>drive</u>	<u>no</u>	<u>no</u>	<u>13</u>
<u>2300</u>	<u>unload</u>	<u>no</u>	<u>no</u>	<u>28</u>
<u>23.30</u>	<u>spell</u>	<u>yes</u>	<u>yes</u>	<u>28.3</u>
<u>Day 5</u>	<u>spell</u>	<u>yes</u>	<u>yes</u>	
<u>Day 6</u>	<u>spell</u>	<u>yes</u>	<u>yes</u>	<u>0</u>
<u>0500</u>	<u>load</u>	<u>no</u>	<u>no</u>	<u>0</u>
<u>0800</u>	<u>drive</u>	<u>no</u>	<u>no</u>	<u>3</u>
<u>2000</u>	<u>cross load &amp; stop</u>	<u>no</u>	<u>no</u>	<u>15</u>

**Comment [KdW20]:** 29.7 hour mid-journey spell

<u>Day 7</u>	<u>stop</u>	<u>no</u>	<u>no</u>	<u>19</u>
<u>0200</u>	<u>drive</u>	<u>no</u>	<u>no</u>	<u>21</u>
<u>0700</u>	<u>unload</u>	<u>no</u>	<u>no</u>	<u>26</u>
<u>0720</u>	<u>spell</u>	<u>yes</u>	<u>yes</u>	<u>26.3</u>

LTS Definitions – proposed revision:

water deprivation  
time

The total time animals are deprived of water, including during mustering away from water, yarding and water curfew time before transport, loading, time on the vehicle whether moving or stationary unless reasonable access to water is provided, and time during unloading and holding at the destination until reasonable access to water is provided.

Where a voluntary spell exceeds four hours, the time that water is provided to livestock during the spell can be used to extend the total time of the trip within the permitted maximum time off water if the livestock meet the fitness requirements.

*See Time off water*

spell — mandatory

A spell is a mandatory requirement when maximum time off water is reached before starting a further journey, as defined by standards for each species.

A mandatory spell is where a standard requires an animal to be spelled.

Water, food and space to lie down must be provided to all livestock, on a stationary vehicle or off a vehicle.

Where animals are unloaded, a spell starts from the time all animals are unloaded and ends when animals are handled for reloading.



spelling, spell or  
spelling  
period —  
voluntary

A spell may occur voluntarily before loading, mid-journey  
or at the completion of a journey.

Water and space to lie down must be provided to all  
livestock, on a stationary vehicle or off a vehicle.  
Food and shelter may also be provided. A mid-  
journey spell must be a minimum of 4 hours to be  
recognised for the provision of water and rest.

Where animals are unloaded, a spell starts from the time all  
animals are unloaded and ends when animals are  
handled for reloading.

The time used for spells of longer than 4 hours during the  
journey will not be included in the calculation of the  
total time off water. A spell less than 4 hours  
duration is not recommended or recognised for  
water deprivation time calculation, but can be  
undertaken as necessary.

Where livestock are voluntarily spelled for 24 hours with  
food, any subsequent journey can be considered as a  
new water deprivation period.

A spell does not include time spent in curfew.

time off water

When water is not reasonably accessible for livestock,  
Equivalent to water deprivation time. Time off  
water is cumulative from the first livestock handling  
or curfew, unless livestock are given reasonable  
access to water. During transport this minimum  
reasonable access period is four hours.

**Comment [KdW21]:** Reasonable access to water on a property is a management decision. During transport livestock are faced with unfamiliar circumstances and other stressors that may deny them an opportunity to drink.