



# **Results of the public consultation for the Draft Land Transport Standards & the Regulatory Impact Statement**

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**Publication Details**

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# Summary

This report provides the preliminary results of a public consultation process, which was conducted for the draft Land Transport Standards (LTS) and its accompanying Regulatory Impact Statement (RIS). Animal welfare stakeholders and the general public were invited to make submissions on the LTS and/or RIS between 27<sup>th</sup> of March and the 27<sup>th</sup> of May, 2008. This process is part of broader consultative and collaborative activities undertaken with key animal welfare stakeholders that commenced in November 2006.

A total of **116 submissions** were received, most of which were sent from Victoria and NSW. Most of the submissions received were from the livestock sector (28%, 33), followed by individuals not specifying their occupation (26%, 30), and the animal rights (8%, 9) and animal welfare sectors (6%, 7). 61% (71) of the submissions were *written* and the remaining 39% (45) were *structured* submissions. All of the structured submissions were completed by individuals (as opposed to representatives of formal organisations).

For **Part A** of the LTS, SA5 (Loading, transporting, and unloading), SA1 (Responsibilities and planning), and SA2 (stock handling competency) were considered most frequently in the structured and written submissions. Generally, in the *structured* submissions slightly over half of the people indicated they were *satisfied* overall with the adequacy of the Standards and Guidelines. Suggested changes listed in the *written* submissions were often focused on:

- clarifying responsibilities for exercising a duty of care for livestock;
- clarifying appropriate type and levels of competency (including for humane destruction) and appropriate ‘training’ for and (practical, formal) evidence of competencies;
- clearer – and sometimes stricter requirements for ventilation, vertical clearance, cleanliness, and injury risks;
- clarifying appropriate assessment criteria and methods for determining fitness, injury, unconsciousness, and illness/disease;
- disallowing certain handling procedures (prodders, dogs, dragging);
- whether to place specific loading densities Guidelines into the Standards and provide additional factors;
- shortening the maximum time off water; and
- humane destruction: appropriate use of firearms, accessing expertise in remote areas, and OH&S issues.

For **Part B** of the LTS (the species-specific sections), cattle received the most attention in the submissions, followed by a relatively even amount of interest in pigs, poultry, and sheep. Generally, in the *structured* submissions more people indicated they were dissatisfied with the adequacy of the Standards and Guidelines – except for the Standards and Guidelines for horses. Suggested changes listed in the *written* submissions included (but were not limited to) a focus on:

- reducing travel times, time off water (across all species);
- disallowing use of electric prodders, use of blunt trauma for humane destruction (alpacas, deer, pigs, sheep);
- greater clarity re: transport of pregnant animals (e.g. alpacas, goats); and
- clearer – and sometimes stricter requirements for loading densities and travel in extreme temperatures.

Of those people choosing to rate the adequacy of the **RIS** in their *structured* submissions, most of them (77%, 23) felt that the RIS *did* demonstrate the overall need for the Draft Land Transport Standards. Two *written* submissions included a critique of the way that costs and benefits were identified in the RIS. Seventeen *written* submissions included specification of their preferred alternatives:

- nine submissions noted support for **Option B** as it is currently written, and one submission stated support for Option B if it was changed;
- two submissions noted the need for changes to **Option B1**;
- two submissions noting support for **Options B1, E1, and/or E2**
- one submission noting the need for changes to **Options B1, E1, and E2**; and
- one submissions noting a lack of support for and the need for changes generally to the range of alternatives.

# Introduction

This report provides preliminary results of the public consultation process, which was conducted for the draft Land Transport Standards and its accompanying Regulatory Impact Statement (RIS).

The public consultation process is part of a broader consultation process with key animal welfare stakeholders that commenced in November 2006. The overall consultation has included a range of formal and informal activities, including formation and operation of the Land Transport Standards Reference Group (SRG). The SRG is comprised of key stakeholders who have formal responsibility for livestock transport and/or who would be most directly affected by the Land Transport Standards<sup>1</sup>, including the Animal Welfare Working Group (AWWG). The SRG has met numerous times and has had a central role in assisting with the drafting of the Land Transport Standards.

The overall purpose of the public consultation process for the Land Transport Standards and the RIS was to:

- *identify and understand the issues and concerns of stakeholders and the interested public, and to ensure they are carefully considered.*

Information from the public consultation is to be used to inform deliberations led by Animal Health Australia (AHA), the AWWG, and the SRG about:

- how to develop the Land Transport Standard that specifies how livestock can be transported more effectively and with less risk to animal welfare, with consideration for:
  - selection and preparation of livestock prior to transport;
  - loading and unloading of livestock using well-designed and maintained facilities;
  - management and handling of livestock by competent stock people;
  - designing and maintaining road and rail transport facilities and vehicles used;
  - planning and scheduling transport journeys to ensure prompt delivery of livestock, and with consideration of situations that may impact the welfare of the livestock; and
- adequately demonstrate the need for the proposed Standards (through preparation of the Regulatory Impact Statement (RIS)).

Three ‘tiers’ of stakeholders were targeted for the public consultation process:

- **key stakeholders:** those parties with some formal responsibility for and/or direct involvement or interest in livestock transport (e.g. SRG representatives’ members or constituents, others);
- **other stakeholders:** range of less well-known stakeholders (represented by formal organisations/groups) with more indirect involvement and/or interests in livestock transport; and the
- **interested public:** range of people with direct or indirect interests in livestock transport - but who may not ‘represented’ by formal organisation/group (e.g. farmers not members of NFF, sport horse owners, road users).

The public consultation process sought *written feedback* from a range of stakeholders as mentioned above. The process was designed to provide flexibility for people wishing to make submissions on the Draft Standards and/or the RIS. People were given a choice to send a submission that:

- they had written themselves (*referred to in this report as ‘written submissions’*), or

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<sup>1</sup> Those stakeholders represent the cattle, sheep/wool, pig, poultry, horse, goat, emu/ostrich industries; livestock transporters; saleyards; lot feeders; veterinarians; animal welfare organizations; and government agencies responsible for animal welfare.

- that was comprised of pre-prepared, structured (closed end) questions to rate the adequacy of the draft Standards and/or RIS, including space to provide reasons for the different ratings (*referred to in this report as 'structured submissions'*).

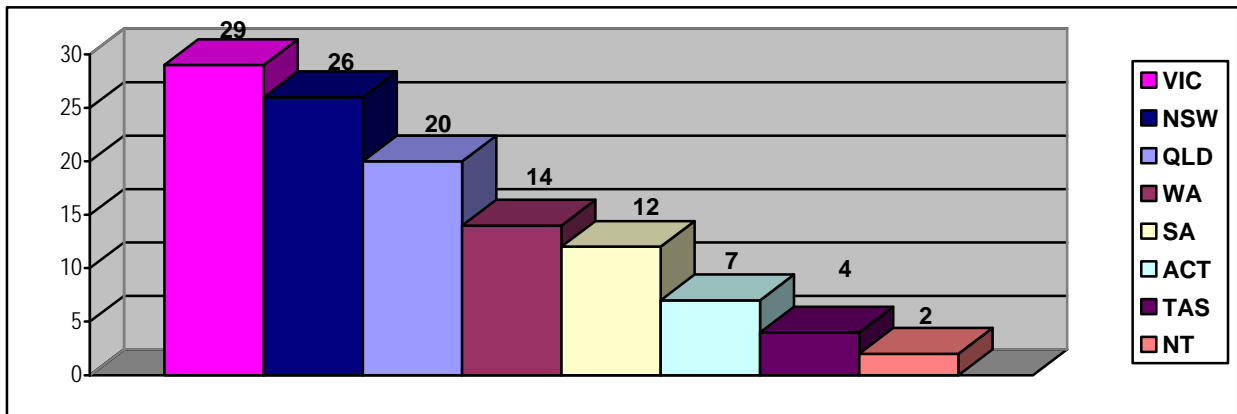
The public consultation process ran for 60 days (from 27<sup>th</sup> of March to the 27<sup>th</sup> of May, 2008). Notice of the public consultation was disseminated through SRG members and other organisations directly contacting their constituents, issuing media releases (with 18 actual placements in regional and national newspapers), and placing information in various industry newsletters. Animal Health Australia issued regular reminders to SRG members about the consultation period.

# Results – who sent submissions

A total of **116 submissions** were received during the public consultation for the draft Land Transport Standards and the Regulatory Impact Statement (see Appendix 1 for complete list). Of those submissions:

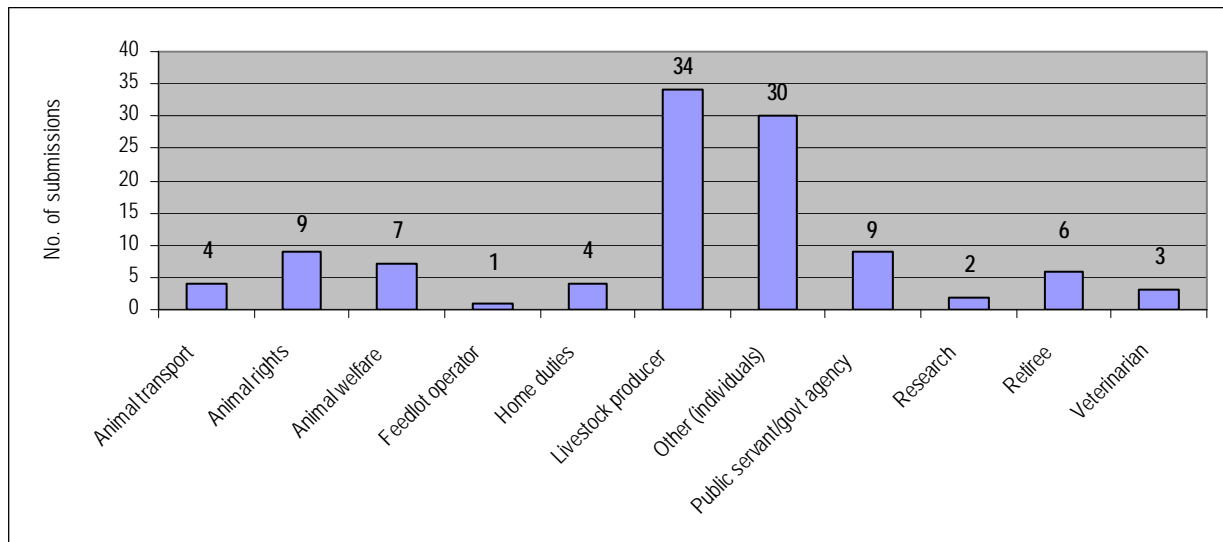
- 60% of the submissions (70) were those that people/organisations<sup>2</sup> had written themselves (written submission); and
- 40% of the submissions (46)<sup>3</sup> were prepared using the structured form (structured submissions).

Figure 1 provides a breakdown of submissions received from the different States and Territories (n = 107). The majority of submissions were received from Victoria and NSW. It is worth noting that all but one of the submissions from the ACT was prepared by peak industry/sector organisations (e.g. RSPCA, Australian Pork Ltd).



**Figure 1. Location of submissions**

Figure 2 shows the distribution of different occupations/areas of interest among those making submissions (n = 109). Not surprisingly, the highest percentage of submissions were made by those with an interest in the livestock sector. This group was followed by individuals (who selected ‘other’ to identify their main occupation), and animal welfare and animal rights groups.



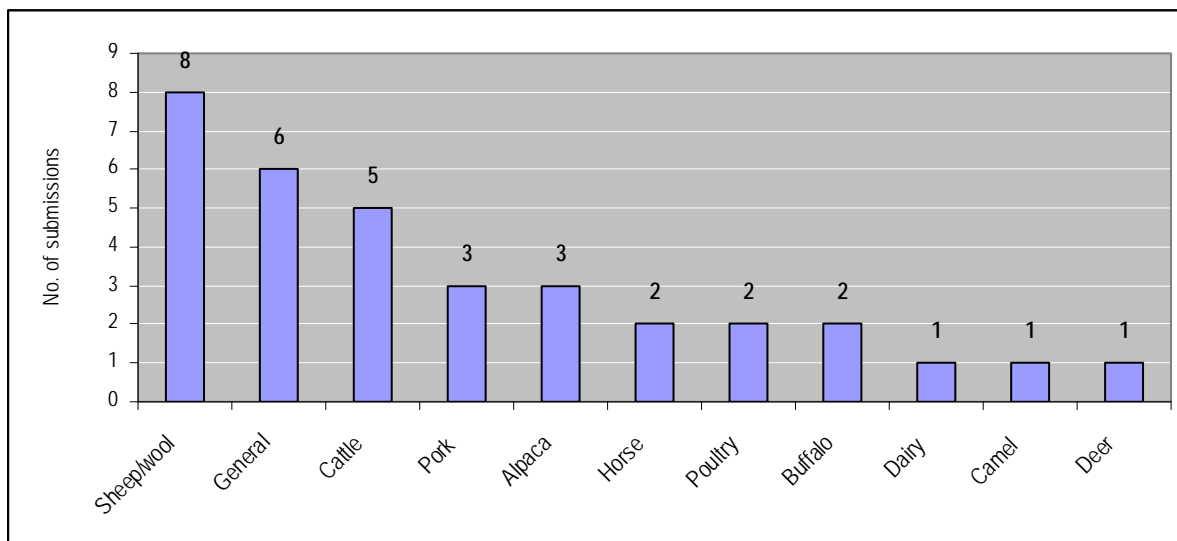
**Figure 2. Occupation/main area of interest of people making submissions**

<sup>2</sup> Sixty-three percent (42) of the *written* submissions received were from formal organizations.

<sup>3</sup> All of these submissions were prepared by individuals compared to those prepared by representatives of formal organizations.



Figure 3 shows the breakdown of submissions sent from the livestock sector (33) – the greatest number coming from the sheep/wool, general farming, and cattle sectors.



**Figure 3. Livestock sectors represented among the submissions (written & structured)**

# Results – Part A of the LTS

## General topics covered

Figure 4 shows the sections in Part A of the draft Land Transport Standards covered in the submissions (written and structured). SA5 (Loading, transporting, and unloading), SA1 (Responsibilities and planning), and SA2 (stock handling competency) were considered most frequently.

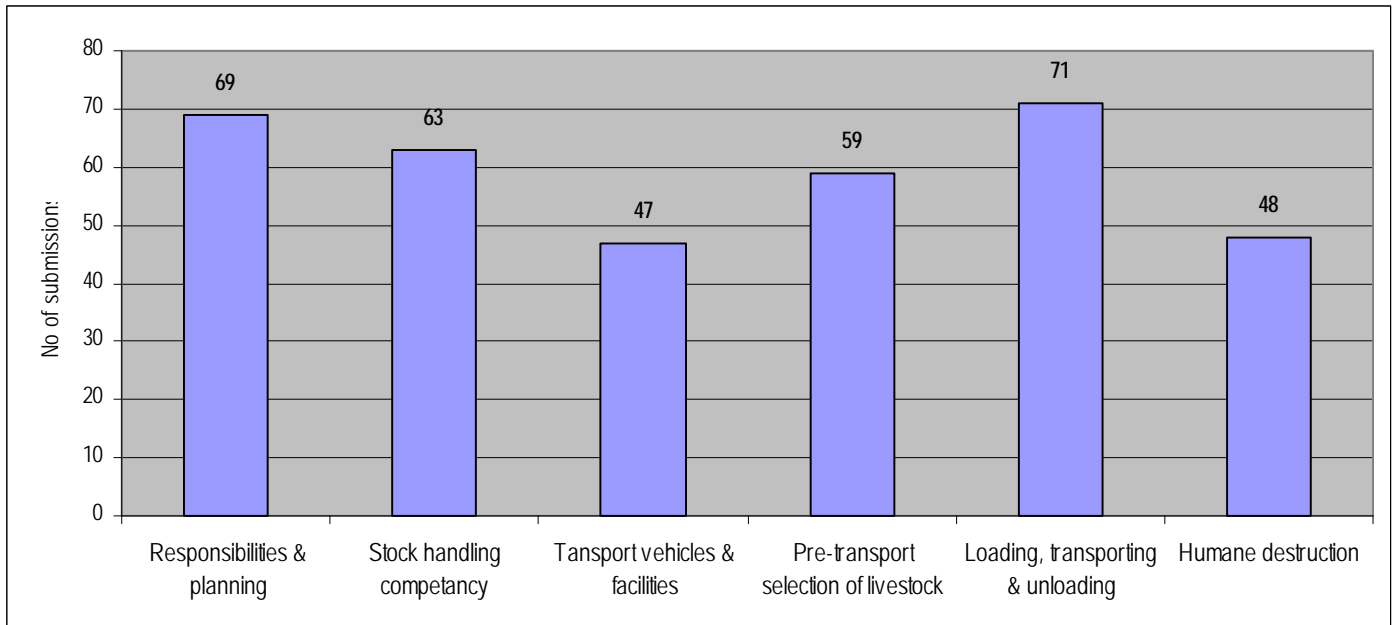


Figure 4. General standards mentioned in submissions

## SA1 & GA1 - Responsibilities and planning

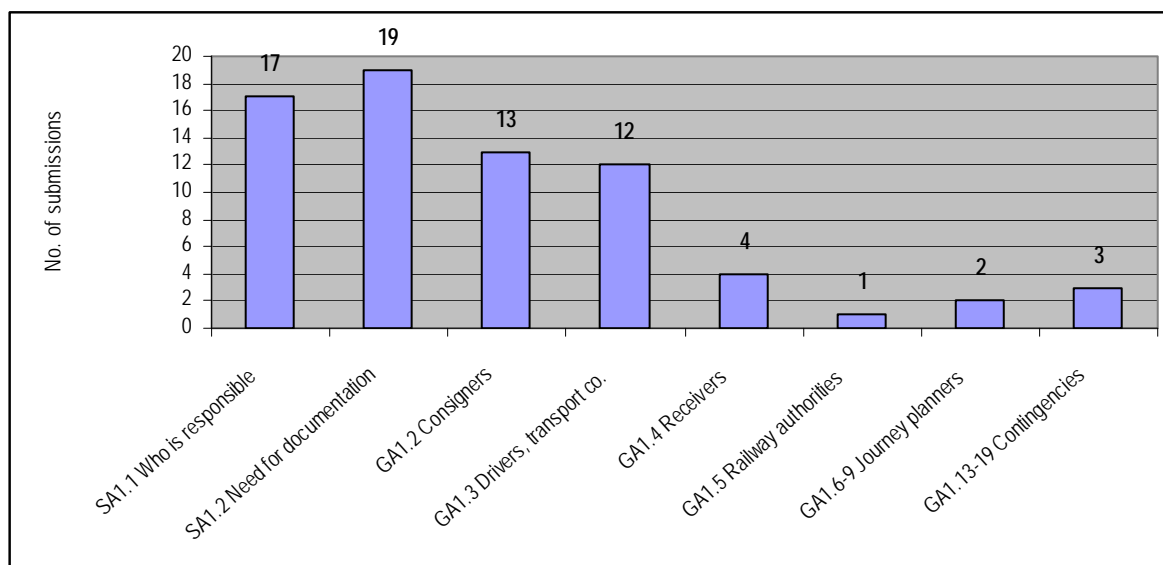
### Structured submissions

Thirty-one people provided a rating of the Responsibility and planning Standards and 29 people provided a rating of the Responsibility and planning Guidelines. Table X shows that just over half of them (53%, 50%) *agreed* that the Standards and Guidelines for the responsibilities and planning would help protect the welfare of livestock during transport. Twenty people provided additional comments with their ratings (Appendix 2) and these referred to:

- a statement about these Standards and Guidelines being adequate;
- questions about truck drivers' competency to conduct inspections, assessments, and humane destruction;
- concerns about the lack of 'enforceability' (and therefore lower compliance) of the Guidelines, and to a lesser extent the Standards;
- requiring documentation for journeys over 8 hours and for animal injuries and/or death; and
- strengthening the Standards by seeking zero risks rather than minimising risks.

### Written submissions

Figure 5 shows that of the (38) written submissions focused on Standard 1 – they most frequently identified the need for changes to SA1.1 and 1.2 (identifying who in the transport process is responsible to exercise a 'duty of care' and required documents for journeys over 24 hours). The responsibilities of consigners and drivers/transport companies also received considerable attention in the written submissions.



**Figure 5. Responsibilities and planning matters mentioned in written submissions**

## SA2 & GA2 - Stock handling competency

### Structured submissions

Thirty people provided a rating of the Standards and Guidelines for stock handling competency. Just over half of them (52%) *agreed* that these Standards and Guidelines would help protect the welfare of livestock during transport. Nineteen people offered further comments on these Standards and Guidelines (see Appendix 3) and these referred to:

- having compulsory training for handlers and transporters;
- greater clarification of what constitutes ‘competency’;
- greater promotion of and information provision on relevant training/courses;
- placing competency requirements in the Standards rather than having them as Guidelines;
- poor record of compliance in Western Australia;
- the practical issues associated with crediting and documenting experience and providing supporting evidence of competency; and
- disallowing the use of electric prodders.

### Written submissions

Figure 6 shows that of the 31 submissions mentioning Standard 2, most of the focus was on the first part of the Standard, and covered a range of conflicting matters such as:

- how competency is derived both from experience and training;
- how there should be requirements for evidence of (formal) training;
- the standard being seen as overly ambitious and unrealistic, particularly given rural skills shortages; and
- the wording of the Standard being too vague/general.

The other strong focus of these submissions was on the second Guideline (GA2.2), with some submissions noting:

- that there were too many requirements rendering the Guideline unrealistic and/or unworkable;
- the need for competency-based assessments to determine competency;
- support for the need for people to be trained, and including those specifications in industry codes (e.g. Truck Care).

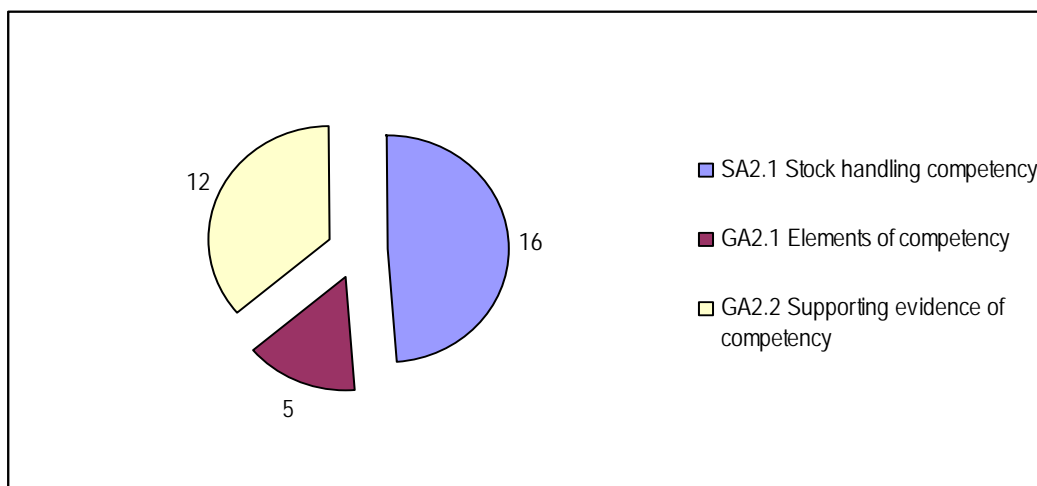


Figure 6. Stock handling competency matters mentioned in written submissions

## SA3 & GA3 – Transport vehicles and facilities

### Structured submissions

Thirty-two people provided a rating of the Standards on transport vehicles and facilities and 30 people provided a rating of the associated Guidelines. Over half of them (52%, 58% respectively) *agreed* that these Standards and Guidelines would help protect the welfare of livestock during transport. Seventeen people offered further comments on these Standards and Guidelines (see Appendix 4) and these referred to:

- ventilation requirements be more clearly specified and measurable (e.g providing clear air flow and address exhaust fumes);
- greater allowances for vertical clearance;
- allowing sub-standard facilities the time to improve;
- lack of enforceability of guidelines (e.g. terms such as ‘appropriate’ are too subjective).

### Written submissions

Among the written submissions (16) covering Standard 3, two included general statements of support for the Standard. The remaining submissions covering this topic suggested changes to words and concepts to tighten the meaning and therefore effectiveness of the Standards and Guidelines, including:

- use of the phrase ‘minimising risk’ as being too open to interpretation to be effective;
- the need to define body parts more clearly;
- greater requirement for/specification of keeping transport vehicles clean;
- greater specification of providing for vertical clearance;
- greater specification of ‘pollution’ and ensuring animals do not experience respiratory distress; and
- condition and features of loading and unloading ramps.

## SA4 & GA4 – Pre-transport selection of livestock

### Structured submissions

Thirty-one people provided ratings of these Standards and Guidelines. A majority (63%) agreed that the Standards relating to pre-selection of livestock would help protect the welfare of livestock, and half of them (50%) felt that the Guidelines would also help protect animal welfare. Fifteen people offered further comments on these Standards and Guidelines (see Appendix 5) and these referred to:

- support for the visual and other assessment criteria;
- disallowing journey times over 48 hours and 48 hours without water considered too long;
- disallowing transport of pregnant, young, or injured/distressed animals;
- concerns about criteria and responsibilities for assessing ‘severity’ of animal injuries/distress; and
- concerns about a lack of enforceability of (voluntary) guidelines.

### Written submissions

Twenty-eight submissions included suggested changes to these Standards and Guidelines. There was a strong focus on changes to the fitness criteria for loading livestock (SA1.1 & 2):

- allowing relocation of injured/sick animals for a short distance;
- it not always being necessary to destroy lame animals (e.g. pigs)
- recognising visual assessment as appropriate for assessing fitness;
- visual assessment not appropriate for detecting dehydration;
- the need to add animals showing signs of ‘disease’;
- providing separate pens for pigs; and
- the need to mandate documentation of animals transported under special circumstances.

And on the Guidelines (GA4.6 & 7) for access to water being provided by the consigner comments included:

- should only be for longer trips and where its feasible (safe) to access animals;
- should be worded more strongly to ensure maximum time of water is not reached

Other comments on the Guidelines included the need to make GA4.2 and 4.5 into Standards, while some comments called for GA4.5 to be removed altogether.

## SA5 & SA5 - Loading, transporting, and unloading livestock

### Structured submissions:

Thirty-one people provided ratings of these Standards and thirty-two provided ratings of the Guidelines. Half of them *disagreed* that the Standards relating to loading, transporting, and unloading would help protect the welfare of livestock, while half *agreed* that the Guidelines would help protect animal welfare during transport. Twenty-two people offered further comments on these Standards and Guidelines (see Appendix 6) and these referred to:

- need for loading densities to be included in the Standards;
- lack of support for use of electric prodders, dragging or lifting animals by one leg;
- need for drivers to have animal handling training and qualifications;
- greater care provided in lifting of animals and for newborn animals;
- tightening and clarifying fitness measures;
- strengthening the guidelines by incorporating some of them into the Standards.

### Written submissions:

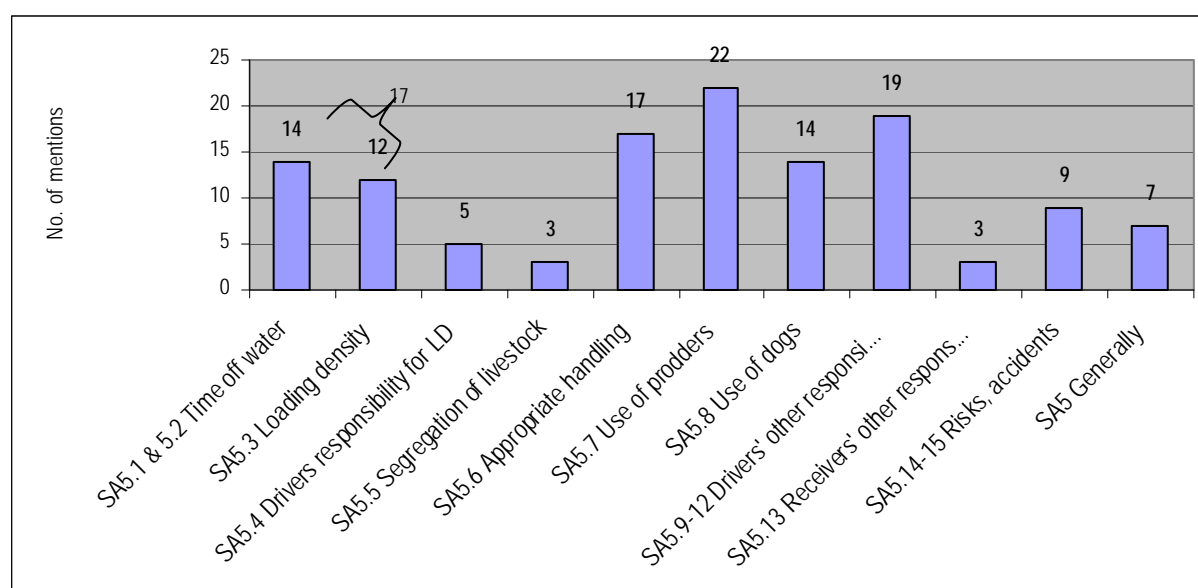
Figure 7 shows that of the 40 submissions mentioning these Standards, the most frequently mentioned issues related to:

- **the use of prodders** (SA5.7): the majority of these submissions included an objection to the use of prodders and six supported careful use of prodders – two calling for tighter wording of the relevant clauses;
- **drivers’ other responsibilities**(SA5.9-12): suggested changes for ramp specifications (including consignors and truck owners, re-orient towards minimising risks); livestock inspections (add poultry, ensure access to

water, questions about the feasibility of the Standard, and agreement with it); and distressed animals (action should be immediate, more specific wording);

- **loading density** (SA5.3-4): who should decide on animals’ weights, the need to specify responsibilities within rail transport, the competency of poultry pickup crews to decide on densities, the vague wording of the Standards (e.g. use of ‘risk’), the need for the density specification tables to be Standards – and that they add factors including age, design and capacity of vehicles, size of crates/containers, whether animals can rise unassisted and if they have sufficient head clearance.
- **other handling issues during the journey** (SA5.6): disallowing any dragging, including by a single limb; providing extra support if lifting an animal by the leg; providing increased protection or animals; and one statement of support for this clause as written.

The other frequently mentioned changes related to whether to totally ban the use of dogs (SA5.8) and limiting the time off water (SA5.1, 5.2).



**Figure 7. Loading, transport, & unloading standards mentioned in written submissions**

These submissions also suggested changes to all the Guidelines for loading, transport and unloading – except for the Guidelines on segregating livestock, in-transit inspections, and railway transport. The most frequently mentioned Guidelines requiring changes included:

- SG5.34-40: stops and spells for livestock;
- SG5.10-11: use of electric prodders;
- SG48-49: identifying weak, sick and injured animals; and
- SG5.5-8: handling livestock.

Changes to the remaining Guidelines were mentioned relatively equally (3-4 times).

## SA6 & GA6 – Humane destruction

### Structured submissions

Thirty-one people provided ratings of these Standards and thirty-two provided ratings of the Guidelines. People were evenly divided about the adequacy of the Standards: 45% disagree and 45% agreed that these Standards would help protect the welfare of livestock during transport. A majority of people (60%) disagreed that the Guidelines would help protect the welfare of livestock during transport. Twenty people offered further comments on these Standards and Guidelines (see Appendix 7) and these referred to:

- a need to better define ‘competency’ and establish a national competency standard;
- logistical and safety considerations associated with humanely destroying pigs during transport;
- ‘restraints’ need to be defined;
- disallow blunt trauma for newborn animals; and
- the challenge of achieving adequate enforcement of guidelines.

### **Written submissions**

Among the 17 written submissions discussing humane destruction, there were more suggestions for changes to Standards than on the Guidelines. These recommended changes covered each of the Standards (6.1-9), and included issues such as:

- the need to specify moribund animals as severely injured;
- the need for advanced training and identification of competency criteria for persons qualified to undertake humane destruction;
- the challenges of accessing expertise in remote areas;
- greater specification of appropriate firearm use in humane destruction of pigs and cattle;
- laws against carrying firearms in some jurisdictions (e.g. WA);
- OH&S issues associated with humanely destroying livestock in full transport vehicles;
- Strengthening specifications on the use of captive bolts;
- Identifying assessment criteria for assessing unconsciousness.

Comments relating to the Guidelines were focused on providing more specificity in the guidelines relating to use of firearms (GA6.8 & 10) and captive bolts.

## Results – Part B of the LTS

Figure 8 shows the sections in Part B of the Draft Land Transport Standards covered in the submission – both written and structured. Cattle specifications received the most attention, followed by a relatively even amount of interest in pigs, poultry, and sheep.

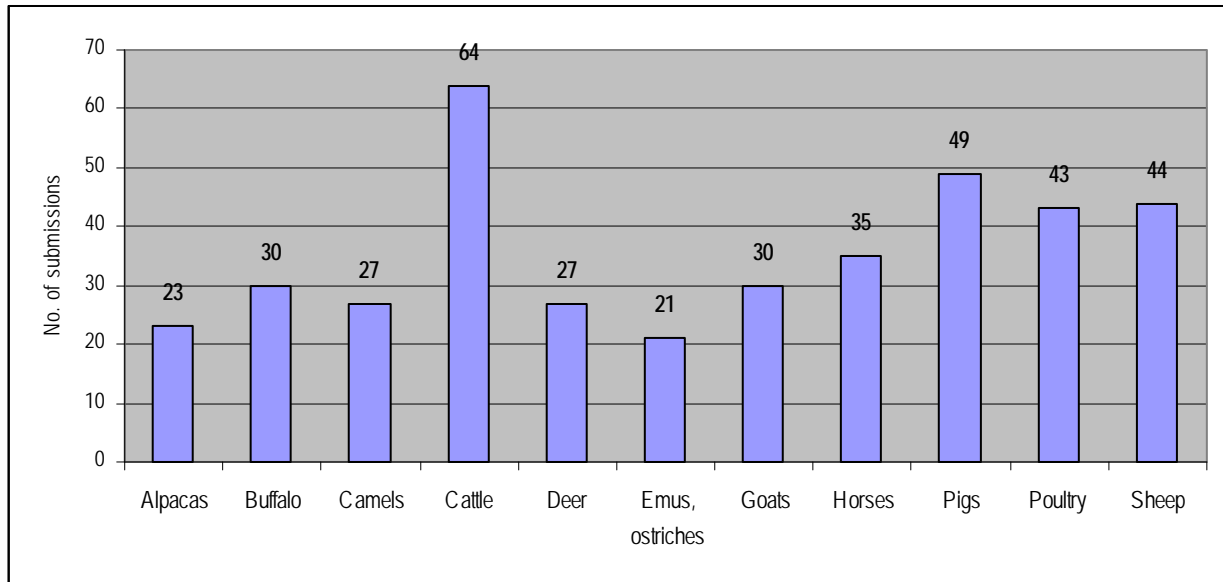


Figure 8. Species standards & guidelines mentioned in submissions

### SB1 & GB1 – Alpacas

#### Structured submissions

Eighteen people provided a rating of the Alpaca Standards and 17 people provided a rating of the Alpaca Guidelines. Just over half of them (50%, 52%) *disagreed* that these Standards and Guidelines would help protect the welfare of these animals during transport. Six people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- transport of pregnant animals overly restrictive;
- disallowing use of blunt trauma to humanely destroy animals;
- allowable time off feed and water excessive; and
- the need for adequate enforcement provisions.

#### Written submissions (6)

Greater emphasis was placed on making changes to the Guidelines than to the Standards. Most of these submissions suggested changes to the first four Standards: time off water, journey times, and transporting pregnant animals. Five of the submissions called for changes to the Guidelines – three of them sought changes to fitness guidelines (GB1.1-4), and the next most common request was for changes to loading density specifications.



## **SB2 & GB2 – Buffalo**

### **Structured submissions**

Seventeen people provided a rating of the Buffalo Standards and 17 people provided a rating of the Buffalo Guidelines. Over half of them (58%, 52%) *disagreed* that these Standards and Guidelines would help protect the welfare of these animals during transport. Six people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- allowable time off water too long;
- the issue of how – if at all – to use electric prodders;
- consideration of time of day for loading and transporting animals; and
- need for floor grids in vehicles and not having animals in back of rear trailer in road trains.

### **Written submissions (12)**

There was a greater emphasis placed on making changes to the Standards for Buffalo – most of this focus was on revising the specifications for time off water, transporting pregnant animals, and use of electric prodders. There were two suggested changes to the Guidelines GB2.9 (ramp slopes) and GB2.15 (use of electric prodders).

## **SB3 & GB3 – Camels**

### **Structured submissions**

Sixteen people provided a rating on the Camel Standards and Guidelines. They were fairly divided in their opinions about whether these Standards and Guidelines would help protect the welfare of camels during transport:

- 43% disagreed, 13% neutral, 44% agreed about the adequacy of the Standards; and
- 50% disagreed, 6% neutral, 44% agreed about the adequacy of the Guidelines

### **Written submissions (11)**

Greater emphasis was placed on making changes to the Standards for Camels than on the Guidelines. The interest was spread relatively evenly across Standards SB3.1-6 (time off water, journey times, transporting pregnant animals, space, electric prodders, use of dogs), with two submissions calling for changes to the humane destruction specification. Two submissions sought changes to the Guidelines (GB3.1-17). Three people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- reducing the time off water, providing for shade, single deck transport;
- restricting travel in excessive heat;
- limit journey time to 24 hours;
- greater strength to Guidelines by converting them to Standards.

## **SB4 & GB4 – Cattle**

### **Structured submissions**

Twenty-eight people provided a rating on the Cattle Standards and 27 people provided a rating of the Cattle Guidelines. A slight majority (59%, 55%) *disagreed* that these Standards and Guidelines would help protect the welfare of cattle during transport. Fourteen people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- reducing the travel time, improving conditions, and raising allowable age for transport of bobby calves;

- ensuring appropriate resources for implementation and enforcement of Standards and Guidelines;
- reducing allowable time off water; and
- Protection from heat and cold need to be more specific and measurable.

### **Written submissions (33)**

The most frequently mentioned issues relating to the transport of cattle included:

- Time off water (SB4.1) – mentioned in 17 *written* submissions; and
- Bobby calves (SB4.3-7) – mentioned in 16 *written* submissions

## **SB5 & GB5 – Deer**

### **Structured submissions**

Seventeen people provided a rating on the Deer Standards and Guidelines. A slight majority (58%, 52%) *disagreed* that these Standards and Guidelines would help protect the welfare of deer during transport. Three people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- disallowing blunt trauma as a method of humane destruction; and
- reducing allowable time off food and water and journey times.

### **Written submissions (11)**

In the submissions mentioning deer, most requested changes to the Standards, in particular the specifications on time off water, the use of electric prodders, and methods of humane destruction. Three submissions requested changes to the deer Guidelines, and the suggested changes related to the specification of electric prodders, as well as fitness for transport (antler condition and pregnancy).

## **SB6 & GB6 – Ratites (Emus, Ostriches)**

### **Structured submissions**

Sixteen people provided a rating of the Ratite Standards and Guidelines. They were fairly divided in their opinions: a strong minority (42%) *disagreed* that Standards would help protect the welfare of ratites during transport, while slightly more (50%) also *disagreed* that the Guidelines would help protect welfare of ratites. Three people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to humane methods of destruction (disallowing decapitation, greater clarity regarding ‘use of sharp instrument’) and reducing allowable time off food and water and journey times.

### **Written submissions (6)**

The written submissions mentioning transport of ratites were relatively evenly focused on changes to the standards and guidelines. These suggested changes included:

- including detailed specifications on loading density, handling, vehicle design, fitness, and temperature to the Standards;
- the need to provide spells for chicks and young birds;
- reconsidering the practicality of providing water, feed and shelter to birds held in containers;
- providing an additional standard for how birds should be handled and transported (e.g. vulnerability of neck and wings, transport them in low light/evening);
- tighter wording for the standards relating to handling containers; and
- disallowing shooting of birds for purposes of humane destruction.

## **SB7 & GB7 – Goats**

### **Structured submissions**

Eighteen people provided a rating on the goat Standards and Guidelines. Close to half (49%) *disagreed* that Standards would help protect the welfare of goats during transport, and slightly more (55%) *disagreed* that the Guidelines would help protect welfare of goats. Five people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- reducing mortality rates of feral goats in transport by longer pre-transport spells in yards;
- disallowing bleeding out and blunt trauma as methods of human destruction; and
- reducing time allowed for animals to be off water (6 hours) and total journey times.

### **Written submissions (11)**

Similar to ratites, the written submissions covering goats made a relatively equal amount of recommendations for changes to the standards and guidelines. Those suggestions related to:

- time off water, including in cold conditions (not extending it beyond 48 hours);
- humane destruction methods (provision & use of sharp knives for bleeding out, disallowing use of blunt trauma);
- fitness conditions, including pregnancy (which requires advice of veterinarian if goats are in last 2 weeks of pregnancy);
- loading density guidelines – should provide more space and be in the Standards;
- provision of food and water prior to loading and on long journeys (particularly lactating animals, convert GB7.5,6,9, 10 to standards)
- management of wild goats prior to loading; and
- prohibiting the use of electric prodders and converting that to a Standard.

## **SB8 & GB8 – Horses**

### **Structured submissions**

Twenty-six people provided a rating on the horse Standards and Guidelines. A majority of them (57%) *agreed* that these Standards and Guidelines would help protect the welfare of horses during transport. Eleven people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- use of travelling horse statements;
- not reducing allowable time off water to from six to four hours;
- increasing the size of horse stalls in transport vehicles;
- needing to provide shade for rest stops and specify maximum allowable daytime temperatures; and
- converting several of the Guidelines into Standards.

### **Written submissions (9)**

These submissions placed a relatively equal focus on making changes to the standards and guidelines. One submission provided a statement of overall support for the horse standards and guidelines. Some of the more frequently requested changes to the Stanadards/Guidelines related to:

- specifications for time off water (need to be shortened), journey times;
- vehicles providing more space for vertical clearance and a range of other conditions (e.g. bedding, space to lower the head, etc)

- lameness and illness (clarifying and/or strengthening the restrictions on transporting lame and/or sick animals)
- transport of stallions (make distinctions between wild and otherwise).

## **SB9 & GB9 – Pigs**

### **Structured submissions**

Twenty-four people provided a rating on the pig Standards and 26 people provided a rating of the pig Guidelines. A slight majority (56%, 52%) *disagreed* that these Standards and Guidelines would help protect the welfare of pigs during transport. Eleven people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- restricting transport in excessive heat, providing shade at rest stops;
- allowing the use of electric prodders;
- disallowing blunt trauma and transport of pigs with hernias; and
- reducing the allowable time off water and feed.

### **Written submissions (24)**

The suggested changes of those submissions mentioning pigs were focused almost equally on the standards and guidelines. Changes to the Standards were focused most heavily on time off water and journey time issues, including – but not limited to:

- whether 48 hours is too long for journey time;
- whether to include rest stops.

There were also requested changes to the Standards discussing the use of electric prodders and means of humane destruction. The recommended changes to the pig Guidelines were primarily focused on fitness (transporting pregnant or lactating sows with piglets) and transport vehicles and facilities (conditions in the heat).

## **SB10 & GB10 – Poultry**

### **Structured submissions**

Twenty people provided a rating on the poultry Standards and Guidelines. A majority of them (72%, 66%) *disagreed* that these Standards and Guidelines would help protect the welfare of poultry during transport. Nine people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- reducing the allowable time off feed and water; and
- improving handling methods (e.g. number of birds carried by legs, providing lower loading densities).

### **Written submissions (22)**

The most frequently recommended changes related to the specifications for time off water, the containers for holding poultry in, not transporting poultry with broken legs, and appropriate methods for carrying poultry. The most frequently mentioned changes to the Poultry Guidelines related to:

- handling, catching and loading of poultry during pick-ups (the number of chickens to carry at once, ways of holding hens, and angles of conveyors);
- optimal temperatures of transport vehicles and facilities (suitable covers, appropriate air temperatures, time left in vehicles prior to slaughter); and
- loading densities (criteria for determining space, climatic conditions, birds' ability to sit, and particular space allowances).

## **SB11 & GB11 – Sheep**

### **Structured submissions**

Nineteen people provided a rating on the sheep Standards and 18 people provided a rating of the sheep Guidelines. A majority of them (60%, 66%) *disagreed* that these Standards and Guidelines (respectively) would help protect the welfare of sheep during transport. Eight people offered further comments on these Standards and Guidelines (see Appendix 8) and these referred to:

- ensuring all vehicles have enclosed fronts and provide protection from inclement weather (heat and cold);
- disallowing bleeding out and blunt trauma as methods of humane destruction;
- decreasing loading densities;
- reducing the allowable time off feed and water; and
- improving resources for enforcement of Standards and Guidelines as a means to achieve compliance.

### **Written submissions (24)**

The most frequently mentioned changes in the sheep standards and Guidelines were by far those specifications relating to time off water (SB11.1 & 2), including extending time off water in cold conditions (GB11.7). The next most frequently mentioned issues related to the Guidelines included loading densities, some fitness criteria, and addressing wind chill and minimising stress.

# Results - the RIS

## Structured submissions

For those people choosing to rate different aspects of the RIS in their structured submissions, some felt that the RIS adequately:

- demonstrated the overall need for the Land Transport Standards (77%, 23);
- identified the costs of the LTS (55% (15);
- identified the benefits of the LTS (65%, 19); and
- identified the range of stakeholders who would be affected by the LTS (65%, 19).

However, 53% (14) did not feel that the RIS's proposed methods for evaluating the LTS were adequate.

## Written submissions

Twenty of the (written) submissions made specific mention of the RIS. Most of those submissions (17) specified what Options they preferred in the RIS:

- nine submissions noted support for **Option B** as it is currently written, and one submission stating support for Option B if it was changed;
- two submissions noted the need for changes to **Option B1**;
- two submissions noting support for **Options B1, E1, and/or E2**
- one submission noting the need for changes to **Options B1, E1, and E2**; and
- one submissions noting a lack of support for and the need for changes generally to the range of alternatives.

Two submissions were supportive of the RIS and the way in which costs and benefits were identified. Two submissions noted the need for changes to the RIS generally. And two other submissions were not supportive of the way that the costs and benefits were identified.

# Appendix 1. List of submissions

Adams, M. \*  
Ag Force Qld  
Against Animal Cruelty Tasmania  
Ahearn, P.  
Animal Health Australia  
Animal Liberation QLD  
Animal Liberation SA  
Animals Angels  
Animals Australia  
Australian Chicken Growers Council  
Australian Chicken Meat Federation  
Australian Lot Feeders Association  
Auastralian Meat Industry Council  
Australian Pork Farms  
Australian Pork Ltd  
Australian Wool Innovation  
AVA  
Baker, S.  
Bannister, L. \*  
Batres, M. \*  
Bercich, G. \*  
Brookwood Alpacas  
Brosnan, P&D. \*  
Brown, P. \*  
Camel Exports Pty Ltd  
Carpenter, S. \*  
Carter, C.  
Cattle Council  
Clancy, P. \*  
Clift, M. \*  
Compassion in World Farming  
Cornelius, D.  
Cornelius, P.  
Crawford, K. \*  
Dairy Australia  
Deer Industry Association of Australia  
Department of Agriculture & Food, WA  
Dixon, A. \*  
DPI Queensland  
DPI Victoria  
DPIW, Tasmania  
Duncan, N. \*  
Embury, A. \*  
Evans, D.  
Eyers, R.  
Feldtman, I.  
Gannon, E. \*  
Golden, R.  
Goudge, J. \*  
Gregory, J. \*  
Hassard, C. \*  
Heikkila, K. \*  
Heinz, F.  
Hickey, D. \*  
Hobba, E. \*  
Horse SA  
Hunter Animal Watch  
Jeffreys, G. \*  
Johnstone, D.  
Kellond, L. \*  
Kenneally, C. \*  
Kingman, M. \*  
Laughton, F. \*  
Lawyers for Animals  
Leslie, S. \*  
Liberation of Animals  
Livecorp  
Livestock Transporters Assoc, WA  
McFadyen, P. \*  
McInnes, D. \*  
Meat & Livestock Association  
Mewburn, M. \*  
MiraBateman, L. \*  
Morley, T. \*  
Moxham, J.  
Mulroney, D. \*  
Munro, R. \*  
Nalato, I.  
Ngo, T. \*  
NSW DPI

NSW Farmers Association  
O'Brady, K.  
Osmond, R.  
Otto, K.  
People Against Cruel Transport  
Porter, F. \*  
Prime Ag Enterprise  
QEFA  
Rannard, T.  
Reid, S.  
Robinson, A.  
RSPCA  
RSPCA Qld  
RSPCA Victoria  
Rural Solutions SA  
Scott, S. \*  
Sellick, S. \*  
Sheepmeat Council

Shugg, M. \*  
Simpson, D. \*  
Smith, K. \*  
Spencer, K. \*  
Stop Tasmanian Animal Cruelty  
Swart, M.  
Tasmanian Farmers & Graziers' Assoc  
Thompson, J.  
Thompson, M. \*  
Thorpe, C.  
Tomkins, D. \*  
Tullabruk Stud  
Victorian Farmers Federation  
Walker, J. \*  
Wilhelm, L.  
Wool Producers  
Zalitis, V. \*

\* *Denotes submissions completed using the structured survey form*



## Appendix 2. Comments from structured submissions: SA1 & GA1

### Comments relating to Responsibilities & planning (SA1 and GA1)

Livestock transported in /ehicles are subject to these terrible problems which affects the health an wellbeing. The pollutants in which is in the livestock trailers need an air exchange an positive air pressure to get rid of the pollutants through the air purifier fitted to the roof of the trailer.

In Western Australia Famers ignore MLA's "is it fit to load" guide. Transport trucks are overloaded continually and many trucks in this state are poorly maintained and rarely cleaned. Drivers rarely stop to check their animal cargoes from A to Z.

There are always people who will try to "get around" requirements and rely on not getting caught

The mix of standards and guidelines presented are adequate to meet the objective of the section. The current mix of responsibilities seem adequate. The current documentation that are required (NVD and con-note) are adequate for animal welfare purposes. At the maximum there should be a small adaptation of current paperwork to meet the standards. The addition of another form to capture this information is not required

Generally you need to be organised and prepared. Pigs must be branded before being loaded and should be loaded quickly

Concerned about probabilities of truck drivers having training and competency to conduct inspections, assessments, humane destruction etc.

The standards only specify who is responsible for animal welfare, not what they must do. The standards only specify that documentation is required for journeys in excess of 24 hours, but do not specify what provisions must be made for this type of journey. Guidelines will not protect the welfare of livestock because they are not enforceable. The imperative of consignors, drivers and receivers is an economic one, not an animal welfare one. If it comes down to a choice between the two, and there is no penalty, then it is highly likely that animal welfare will be the loser.

I strongly believe that there should be a temperature allocation so that stock are not transported during peak daylight hours on days forecast to be over 36 degrees- this is cruel and unreasonable

Chapter 1 provides a clear framework. It could be strengthened by some clear statements at the start directly relating to animal welfare

Guidelines that are not enforced are proven to be ineffective. Every day, I see truck loads of animals where at least one animal is clearly suffering with broken legs stuck outside of vehicles, heads stuck between railings or other. This is not acceptable. The standards are not doing anything to address this most basic requirement for animal welfare. Numerous times on the Western Highway I have seen trailer loads of piglets just piled on top of each other 3 or 4 layers high, screaming and squealing with pain and stress. Obviously, standards and guidelines that are not policed are not effective. Tougher measures are required.

The responsibility is for the 'welfare' of the livestock - no matter how "controversial" and uneconomical this may be. Accountable ownership from the beginning to the end of the journey.

Documentation should be required for journeys reasonably expected to exceed 8 hours.

Guidelines should be standards and enforceable including provision of feed and water, selection of suitable stock and management of stock unfit for journey, actions to ensure wtering, rest and feedtimes are documented and acted on, planning of journey in line with needs of stock, safe transfer of stock and contingency arrangements

I think it needs to be documented all animals injured or dead during the process are recorded to give an idea of mortality rates. What is humanely destroyed? How is this supposed to be carried out, if an injured animal is on the top deck of the truck? If there were regular stops and unloading during the trip this could be dealt with more effectively and humanely. The length of the journey becomes immaterial if food and water stops occur in transit at designated places.

The standards outlined do no go far enough in addressing animal welfare standards.

The objective should be that there should be NO sirks to livestock welfare (rather than to minimise risks which is too open to interpretation).

Guidelines are not enforceable and are therefore of no benefit to the 'livestock'. Where guidelines have any merit, they should become standards and enforced as such

Simply the standards (requirements) are not worded in such a way as to ensure compliance for non conformity. SA1.1 for example should read 'A person in charge must be legally responsible for ensuring the welfare...' not 'exercise a duty of care'. Duty of care is too broad a term, and will allow breaches of standards to go unprosecuted. This industry has been allowed to self regulate at the expense of animal welfare for too long. Time has long passed that 'guidlines' be permitted. If the industry is performing to the communities expectations, it will not have a problem with the standards being enforced, and the guidlines made law, with substantial penalties for those who ignore them

Some of the Guidelines could be Standards

Water and heat is not giving enough credence and the distances and crowding of animals.

once again, guidelines are not enforceable so will have no impact on the welfare of animals

## Appendix 3. Comments from structured submissions: SA2 & GA2

### Comments relating to Stock handling competency (SA2 and GA2)

What authorities train stock handlers? None! 75% of farmers in WA need lessons on how to handle their own Livestock! Truck Driver transporters over-use electric prods and dogs are rarely muzzled - due to the poor design of the majority of animal transport trucks in this state, it is not unusual to see legs and heads and sometimes half a sheep's backside protruding outside the trucks rails....also due to lack of "top covers" many sheep face from the top of a truck onto the Roadways!

Provision needs to be made for competent handlers with years of experience to be credited for their expertise

Section GA2.2 will be onerous for smaller operators and larger operators alike. As a general rule, staff which are not competent are under the supervision of competent staff whenever performing work on the property. It is only when the staff member proves competency to the manager that they will be allowed to work unsupervised. This fact then, by its nature, indicates that the staff are competent.

Make sure your stock handlers move stock effectively. For pigs laneways should be clean and tidy.

Selection as "fit for the intended journey". Drivers may not be competent Stockmen. GA1.3 Truck Drivers are not vets and may not be responsible persons

The use of the term 'competent' seems to be a rather vague term and suggest a non-'competent' person can still carry out actions if under supervision of another 'competent' supervisor, again quite loosely phrased

There should be compulsory training and/or accreditation of all animal handlers AND drivers

The definition of competence is only in the guidelines and therefore not enforceable. The issue of competence to handle stock from an animal welfare perspective is a crucial one. The proposed standard is grossly inadequate

I strongly believe that there should be a temperature allocation so that stock are not transported during peak daylight hours on days forecast to be over 36 degrees- this is cruel and unreasonable

As noted earlier, perhaps more examples of courses /training available to develop competencies

There needs to be compulsory training for handlers and transporters - that they be simply "competent" is far too broad.

Electric prodders are not in the realm of welfare, whether used on genital areas or not!

As above, the standards outlined do not go far enough in addressing animal welfare standards

Guidelines are not enforceable and are therefore of no benefit to the 'livestock'. Where guidelines have any merit, they should become standards and enforced as such.

The fact that the competency requirements are not mandatory standards, but guidelines, makes them pointless. How can a competency be considered a 'guideline' Therefore the requirement to have a competent person, or be supervised by a competent person, can literally mean anything. I am most certain the community would not accept 'guidelines' for the competency of Electricians or plumbers etc. So why should there be only 'guidelines' for competency in the vital area of animal welfare, and indeed food production? The guideline should read Elements of competency for livestock transport must include (not should). Such competency modules should be registered with training organisations of credibility, and be able to be inspected, tested and externally audited for compliance. There should be no guidelines when it comes to training and competency, only mandatory, legally enforceable skill set requirements. The industry would possibly then be able to demonstrate tangible commitment to animal welfare, and the OH&S of its employees.

Compulsory training for people involved in the transport of live animals.

How can electric prodders be allowed? Sheep dragging is not mentioned and there is no training for handlers to be competent in correct handling of animals to ensure stress and pain

Not prescriptive enough. you need to specify exactly what is appropriate for the welfare of the animal

## Appendix 4. Comments from structured submissions: SA3 & GA3

### Comments relating to Transport vehicles & facilities (SA3 and GA3)

Providing clean air flow and air exchange through an air purification system fitted to the roof of livestock transport trailers/vehicles .

See previous comments re trucks. Saleyards in A are also in appalling conditions and have been for decades and staff are poorly trained

Many growers and producers have inherited or purchased facilities which may not meet the standards at the date of their introduction. Time may be needed in order for facilities to be brought into line without placing undue financial stress on producers who are, in many areas, already struggling due to drought and or flood. Scope should be given for the effects of acts of nature and the use of temporary facilities.

GA3.8 should undergo a wording change from "prevents" to "minimises" in order that the guidelines can be achieved.

Make sure all fixtures cannot be moved while being transported so there is no injuries or undue stress to the animals.

Guidelines - GA3.8 some very practical problems for pigs on 3 decks. Collection of movement/urine in trays would reduce ventilation and potentially reduce air quality, heat stress etc.

Only if all parties work together

Objective: 'Minimise' should be 'eliminate'. Standards: ventilation requirements should be more clearly specified and measurable. Guidelines: The term 'significantly' needs to be more specific in terms of exhaust fumes. The fact that poultry are excluded from the guidelines for being able to rise from lying without contacting overhead structure. Young animal and the reduction of cold conditions needs to be more thorough and better means put in place to prevent cold stress.

The standards make no provision for animals being able to stand without hitting their heads, from being soiled from above, or from being thrown around through lack of appropriate partitioning in pens. The standards make no provision for HOW vehicles are operated and maintained, eg driving, cleaning, exhaust gases, etc. Guidelines carry no weight unless mandatory.

I strongly believe that there should be a temperature allocation so that stock are not transported during peak daylight hours on days forecast to be over 36 degrees- this is cruel and unreasonable

For standards include the need to provide protection from the elements.

My concern is that truck drivers are able to destroy animals humanely and may need education in this area.

As above, the standards outlined do not go far enough in addressing animal welfare standards.

The objective should be that there should be NO risks to livestock welfare (rather than to minimise risks which is too open to interpretation).

Stocking densities not covered here and should be standardised and enforceable by law.

Guidelines are not enforceable and are therefore of no benefit to the 'livestock'. Where guidelines have any merit, they should become standards and be enforced as such.

Failure of drivers, operators and handlers with regard to the movement of livestock has seen near misses for the public in the past. Escapes of animals, injury due to leg/head protrusion, poorly loaded and designed vehicles leading to injury of humans and animals alike. Reality would dictate that once again whilst the objective is laudable, the outcomes will not be achieved with regard to employee safety and animal welfare unless the 'guidelines' are made legally binding minimum requirements. With prosecution the result for breaches. There is nothing in the standards to ensure an animal's limbs do not protrude. The guideline should read 'limbs of livestock must not protrude.'. The guideline like all the others must be a legal requirement, or we will continue to see sheep and cattle with dislocated limbs, in great pain and distress, traversing our country, unable to walk at the end of their agonising journey. Surely industry is not saying this is acceptable? Once again, make it law, if there is no problem, then there will be no worries about compliance will there?

Lack of food and watering over long distances and heat stress is not covered sufficiently, or overcrowding.

Not specific at all. What is "appropriate" to one person is "inappropriate" to another.

## Appendix 5. Comments from structured submissions: SA4 & GA4

### Comments relating to Pre-transport selection of livestock (SA4 and GA4)

I have already made a comment on this item in Chapter 1. Many farmers in WA sell direct to Abattoir and its appalling to see the condition of many sheep and cattle arriving in these slaughter facilities.

The standards and guidelines seem adequate and in good mix. I support the "visual assessment" criteria in SA4.1 vi) as more stringent assessment methods (eg vet) would be cost prohibitive.

In the guidelines a four hour spell with access to water is adequate

Make sure the animals are not stressed before loading.

Allow comprised pigs to be penned separately to protect any animal that may not be happy in a larger group.

Time off water - 48 hours for ALL species is too long for any animal to be without water.

Standards state an animal is fit if it is not severely injured or distressed. Who determines level of severity? This is a provision open to the broadest possible interpretation by people who will be likely to take advantage of the obvious latitude.

The information here is useful, including assessment of animals for health, pregnancy, etc.

The pre-transport selection should be carried out by independent selector and not biased towards profit in the hope the animal will make it to the destination. NO pregnant animals to be transported under any circumstance or ante natal animal who has given birth within 2 weeks. No animals under 1 month unless journey stops are less than 4 hours and animals are all of same age and are fed regularly ie four hourly

As above, the standards outlined do not go far enough in addressing animal welfare standards.

GA4.1 is contradictory to the objective if there are "any concerns about the fitness of livestock to be transported" then they should NOT be transported

Guidelines are not enforceable and are therefore of no benefit to the 'livestock'. Where guidelines have any merit, they should become standards and enforced as such.

SA4.1 iii should read 'not showing signs of injury or distress, and must be examined and certified fit by a licenced veterinarian. The definition of severe injury or distress is one that is broad indeed. Once again with the guidelines, too many 'shoulds and not enough musts'. Do we really believe, that the current situation of 'hobbling'dairy cattle being trucked to slaughter will be improved by these 'guidelines'?As said previously, if you think it's good enough to make it a 'guideline', then make it law.

Some of the Guidelines could be Standards

How can this be enforced with not enough staff to carry out the requirements!

Guidelines are not enforceable. make the guidelines standard in all sections.

## Appendix 6. Comments from structured submissions: SA5 & GA5

### Comments relating to Loading, transporting, & unloading of livestock (SA5 and GA5)

This is an area where "training" is badly needed in the truck transporting industries in WA.

Electric prodders and dogs are a necessary tool in the loading and unloading of livestock. Their excessive use should be regulated but they should not be removed entirely as they greatly facilitate the loading and unloading of livestock, thus minimising stress on the animals and cost to the producer/carrier/receiver.

For the loading of pigs, make sure all laneways to pens are free of obstacles so pigs go the one way once only.

Separate pens for pigs requiring special attention

Drivers are not stockmen. Pigs need to be empty on travelling.

Electric prods should not be used under any circumstances on any animals. If dogs are used and they bite the animal they should be muzzled. Animals that are ill or injured and are unable to walk should not be dragged and should be humanely killed without being moved at all. Animals that are not fit or are injured in any way should be excluded from transportation. Stocking density is crucially important to prevent overcrowding and animals becoming crushed under other animals and should be enforced.

I am shocked that SA5.6(ii) allows ANY animals to be lifted by one leg. This is appalling. This standard should be deleted. SA5.7 should be deleted. Electric prodders are cruel and inhumane, and should not be used at all. Leaving their use to the discretion of the handler is open to widespread abuse. The standards should include the humane destruction of downers ON BOARD the vehicle, i.e. downers should not be dragged or prodded off the vehicle.

I strongly believe that there should be a temperature allocation so that stock are not transported during peak daylight hours on days forecast to be over 36 degrees- this is cruel and unreasonable

What about the thousands of 'downers' that are transported each year and treated in an unthinkable way because they are not worth as much as healthy cattle

From Zoo experience, there is an incredible amount of individual variation in way in which animals respond to transport. The guidelines seem to pick the right pitch, so they are not too specific, but not so generic that they lack meaning. Again, it might be appropriate to list some examples of facilities / operations that can be visited, etc to assist with identifying benchmarks.

There is no clear definition for loading densities. This is a most basic cause of suffering with transported animals. It is witnessed every day on any major highway.

There should be no allowance for any animal regardless of age to be handled by a single leg. Electric prodders should not be utilised in any circumstances. Dogs should be required to be muzzled. I note that the comment is that this is not a requirement due to the need in any case to avoid bite marks - that being the case muzzle the dogs. Inspections should be documented. Immediate assistance should be required for ill and injured stock. Transport should not take place in times of extreme weather, especially heat and this needs to be specified and enforced. Loading densities and use of partitions should be regulated. Minimum space allowances are given through the document, but only as Guidelines. Stocking density is crucially important to prevent crowding (and animals becoming crushed under other animals) and should be enforceable--i.e. be listed as 'Standards'. Time off water needs to be reduced in almost all instances from those in these guidelines. It is up to 48 hours for some and even longer if it can be 'justified'. Should be no longer than 6 hours. GA5.7 states specified animals may be lifted off a vehicle - this should be a standard of must be lifted off. Newborn stock must be cared for immediately. I know of cases of newborn lambs just left at saleyards to die. Vet advice must be sought for ill and injured stock - no discretion. Spell times, feeding and watering should be specified and regulated. Off loading recommendations need to be standards and enforced. Handling 'downer' animals--animals that are ill or injured and are unable to walk may be dragged. Such animals arriving at saleyards or abattoirs should be humanely killed in situ (without being moved at all) SA 5.6. A Guideline (GA5.48) that deals with this issue needs to be tightened and made a Standard (i.e. they should be killed humanely on the vehicle - in all cases). Animals that are not fit to load should be excluded from transportation, but the measure of fitness can allow quite ill animals to load, for example GB9.1 would allow pigs with hernias so big that they almost touch the ground, to be loaded. The current standards do not provide for the problems pigs encounter if transported in hot weather. Pigs are particularly susceptible to heat stress, yet this issue is only dealt with in the Guidelines (GB9.8) (i.e. optional), when the Standards should ensure proper measures are taken.

No animals are to remain loaded overnight or for set hours while driver sleeps or at destination if markets are shut for night.

As above, the standards outlined do not go far enough in addressing animal welfare standards

The objective should be that there should be NO risks to livestock welfare (rather than to minimise risks which is too open to interpretation). GA5.15 is contradictory - protection of newborn? why even consider that they should be destroyed!!

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Guidelines are not enforceable and are therefore of no benefit to the 'livestock'. Where guidelines have any merit, they should become standards and enforced as such

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This whole chapter relies upon training of personnel, that may or may not have taken place...because it's not mandatory. The skill sets required to handle, load and unload the livestock, may or may not have been achieved or even discussed, this leads the welfare of the animals in a vulnerable state , and subject to the ignorance and 'care factor' of the employees who have possibly had little or no training

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Electric prods should not be used anywhere on any animal at any time. Ill or injured animals should be humanely killed prior to being moved off the vehicle.

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Some of the Guidelines could be Standards

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Electric prodders are permissible in this draft and there are the problems of overcrowding and not enough supervision by government inspectors which is appalling. There is no mention of dragging of sheep not being allowed.

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There needs to be more regulations in regards to the amount of livestock one truck can carry. So many trucks have so many squashed in it is cruel. If it means another truck needs to used then that should happen. These animals still deserve a bit of dignity. There also needs to be harsher consequences for drivers who disregard this rule.

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These guidelines are not enforceable

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## Appendix 7. Comments from structured submissions: SA6 & GA6

### Comments relating to Humane destruction of livestock (SA6 and GA6)

Many farmers are too lazy to go back and get their rifle or gun to put down an injured sick or dying animal in their paddocks. Truck Drivers do not carry weapons to put down a "downer" in their trucks and saleyards do not train staff to kill an animal humanely

Competency in the area of humane destruction would be difficult to assess and thus, while the desire to have a competent person destroy an animal is laudable, it's inclusion in the standards may force additional costs onto the operators (e.g. a standardised training course for the destruction of animals) that may have a limited effect in reality. This should be removed from the standards and placed in the guidelines, with experience counting as proof of competency.

It is very important to make sure that the Humane Destruction of animals is carried out properly.

Killing pigs during transport with a fire arm would merely be impossible/illegal.

Destruction should only be carried out by humane euthanasia.

I truly wish these animals didn't need to be destroyed at all, but I accept that such a practice is unlikely to change. For this reason it is imperative that death be as humane as possible, and that cruelty and suffering is avoided at all costs.

Needs to be proscribed, humane methods of destruction. Blunt trauma to be removed as option

SA6.2 specifies that destruction should be done by a "competent" person, but then states that if a competent person is not available, one should be contacted at the "first opportunity". What if that opportunity does not present itself for a long period of time? Meanwhile an animal may be enduring terrible suffering. It is essential that anyone with the responsibility for transported animals should also be required to be competent and trained to perform humane destruction. GA6.18 is objectionable. Endorsing bleeding out without pre-stunning is disgraceful. This guideline should be deleted.

Unless there are independent bodies policing these laws etc people will continue to use and abuse farm animals.

The content here is thorough, diagrams also contribute to usefulness

Animals suffer during transport. There are no adequate standards or guidelines for destruction on board which results in hours and hours of suffering which is unacceptable

SA1.6 (is a legal requirement) would cancelling out all other subsections. 6.4 - Reasonable action would be a proved menthos of quick painless slughter - if there is a 1% chance that the animal is conscince or even breathing than that particular method is not correct. 6.4 - what is restraint? hanging upside down, Chained around the neck or feet? serious clarification here please. 6.7 - what possibly is humane about thumping a 24hour infant in the head? Nor the neccessity? 6.9 - In terms of animal welfare, removing people from the vacinity doesn't seem to have any impact on the welfare of the subject being slaughtered.

GA6.14 Captive stunner and bleeding out are not humane and have margins of error. Pithing and bleeding out and blows to head should not be considered methods of acceptable humane destruction. Unlaoding animal at soonest oppurtunity where vet present is more acceptable. If regular stops were part of trip then arranging vet to be present at designated stop is more humane by far.

As above, the standards outlined do no go far enough in addressing animal welfare standards.

Guidelines are not enforceable and are therefore of no benefit to the 'livestock'. Where guidelines have any merit, they should become standards and enforced as such.

The objective, is not definative enough. What a Veterinary professional may deem necessary, as opposed to what a profit driven industry participant may decide is necessary may and most likely will be polls apart. Once again, not enough legal requirements, and too many guidelines that can and will be ignored. Wods such as should as pointless, and can only be credible when they are mandatory requirements, such as when stated as 'must'.

Once again who is there to supervise this humand destruction. There needs to be more detail on euthanasia.

I think the way animals are destroyed should be looked at more. There have been many stories and articles written about when animals have not been properly stunned and they are still slaughtered. They would feel everything and I think this is absolutely distgusting. The problem is the person who is destroying these animals does not care about animals and therefore does not care if they suffer.

To prove my point about the people not caring all you need to do is go for a drive and see the trucks drinving around with so many sheep squashed into the trailers. These animals cant move and some have legs and heads stuck out the side.

"Competent" person must be specified as to what constitutes the competency, a national standard must be put in place with training certificates essential.

## Appendix 8. Comments from structured submissions: Species standards & guidelines (SB1-11, GB1-11)

<b>Alpacas</b>	<p>There is no authority in Aust. Given the power to see that these standards are abided by.</p> <p>Transport of pregnant females unnecessarily restrictive. Females can safely after the first 60days and before the last 60 days of pregnancy,provided they are treated properly.We have transported females that have had successful pregnancies that have been newly mated. Also as it stands this would prevent the showing of most females. The floor space suggested by the guidelines is very constrictive we would allow nearly double that space even on short journeys.</p> <p>blunt trauma is not acceptable, humane euthanasia should be used. Maximum journey length should be considered being reduced</p> <p>Times off water for adult animals appears excessive.</p> <p>As above, the standards outlined do no go far enough in addressing animal welfare standards.</p> <p>The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines.</p>
<b>Buffalo</b>	<p>I would not generally allow buffalo off water as long as they recommend. SB2.4 and GB 2.15 some time there is less stress on an animal by using an electric prod if they are not following each other whilst loading. Free ranging animals caught late in the year Sept - Dec should be loaded in the later afternoon and delivered AM for those travelling long distances. For those travelling short distances over bad tracks which take along time should be watered (sprayed) mid trip. Aggressive animals (bulls) that are stressed and hurting other animals should be moved to a different compartment if they continue they should be head tied for the duration of the trip with figure 8 head rope and release loop. Free ranging animals on dirt roads should be checked every hour for the first three hours there after every two hours if they are travelling well. GB2.9 Flat area of animal length is not a necessity, sometimes a hindrance with Buffalo. Floor grids are a must on the floor. Animals in the third trailer on a triple combination will be more affected by dust on dirt roads so need to be of a stronger nature, consider swapping rear trailer to front on roadtrain. These are some extra comments by an experienced NT operator.</p> <p>Times off water appear excessive.</p> <p>As above, the standards outlined do no go far enough in addressing animal welfare standards.</p> <p>For each species the following comment applies: The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines.</p> <p>SB2.4 Prodder can be used after reasonable actions have failed to cause movement. Would that not suggest it may well be because the animal is ill or injured, or otherwise cannot move? There should be no use of electric prodders. Evidence shows us it is almost impossible to regulate their use. Eliminating their use would assist with credibility, once again too many guidelines, not enough laws.</p>
<b>Camels</b>	<p>Time off water for classes currently above this to be reduced to 8 hours in all cases. Shade a requirement for rest stops. Single deck transport a requirement. Need to specify temperatures at which cannot be transported to avoid heat/cold stress. Journey times not to exceed 24 hours. Guidelines to be enforceable standards</p> <p>As above, the standards outlined do no go far enough in addressing animal welfare standards</p> <p>For each species the following comment applies: The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines.</p>
<b>Cattle</b>	<p>Im especially concerned for the welfare of BOBBY CALVES they seem to be overlooked ,the standards that are in place are very poor.I beleive calves should be at least 12 days old before being transported.5 days is to young,they are not able to stand properly and the risk of them being hurt is very high.cost should not even come into this matter we are talking about the welfare of an animals life. Farmers should be made to keep records of calf births this is very important and not a huge task to undertake. When being transported they must have adequate space for them to lay down,straw must be provided for bedding. Th journey times for the transport of bobby calves needs to be lowered to 5 hours with a break in between so they can be fed and looked over to see if there are any health or safety issues.</p> <p>On arriving at their destination holding facilities must have dry non slip surfaces,hay to lay down on and be sheltered at all time from wind rain and other hazzardous elements. The practice of calve induction should be replaced by better on farm herd</p>



management, induced calves should be humanely destroyed on the farm and not sold. In ending I would just like to say I cannot believe in this day and age we can not come up with a better way to keep cows producing milk, surely the bobby calves must be able to be saved and not just treated as rubbish.

The standards will only help if there are adequate resources to police the requirements. The guidelines will only help the cattle being transported by those willing to adhere to the recommended practices.

The standards and guidelines seem reasonably adequate and in good mix. Maximum time off water is adequate at 48hrs for cattle over 6 months old and for the other categories. 24 hours would be adequate for cattle off water for 48 hours to recover, 36 hours is too long and may have large cost effects on cattle shipment over long distances (e.g. the NT and QLD). The standards make no allowance for unforeseen contingencies and this could lead to difficulties and undue enforcement of the standards in difficult situations.

Stocking densities should stay in the guidelines and not be included in the standards as they will change dependant on route and conditions

Protection from cold and heat to be more specific and measureable. Blunt Trauma not acceptable all should be via humane euthanasia and time off water much too long for all age groups

I agree with the RSPCA's position that national standards should increase the minimum age at which bobby calves can travel to at least 10 days old with the time interval from farm to abattoir to not exceed 10 hours. Vehicles must also provide calves with protection from the elements, with thick bedding and room to lie down

Water deprivation times too long

Time off water standards permit journeys up to 48 hours (and even longer if a transporter can justify it) This is hardly a protection of animal welfare!

The standards outlined do not go far enough in addressing animal welfare standards

The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines

Maximum time off water is far too long, it is extremely cruel and stressful and leads to loss of condition in the animals.

Determination of age under 1 week difficult despite navel chord and hoof development so minimal age for transport (unless for the wellbeing of the calf) should be 8 days

Bobby calves should not be transported

Calves should not be transported until they are at least 10 days old and their time spent travelling should not exceed 10 hours. Thick bedding should be provided as well for calves

Time off water for classes currently above this to be reduced to 6 hours and less for bobby calves.

Shade a requirement for rest stops. Need to specify temperatures at which cannot be transported to avoid heat/cold stress.

Journey times not to exceed 24 hours and 6 hours for calves.

Guidelines to be enforceable standards

**Deer** Blunt trauma not acceptable all should be via humane euthanasia and time off water should be reduced ie less time off water.

Standards outlined do not go far enough in addressing animal welfare standards

The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines

**Emus/ ostriches** Decapitation and vague use of 'sharp instrument' highly unacceptable

the standards outlined do not go far enough in addressing animal welfare standards

The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines.

**Goats** The transport of goats, particularly feral animals is extremely high, re mortalities in WA. Feral goats for live export are not kept long enough in station yards to "quieten them" prior to transporting. Horned and unhorned animals are not separately!

Bleeding out and blunt trauma both extremely unacceptable and disappointing means, humane euthanasia should always be at hand

Time off water for classes currently above this to be reduced to 6 hours and less for kids.

Shade a requirement for rest stops. Need to specify temperatures at which cannot be transported to avoid heat/cold stress.

Journey times not to exceed 24 hours and 6 hours for kids.  
Guidelines should be enforceable standards.

The Standards outlined do no go far enough in addressing animal welfare standards

The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines

## Horses

Travelling horse statements appropriate to trace venues attended if further outbreaks eg EI occur should be across all states of Australia.

No authority has the power to ensure these standards are carried out.

In specific requirements for the land transport of horses b8, it states most horses must not be off water for any more than 12 hours, but aren't most vehicles able to feed and water during the journey. Horses need water to stay hydrated I believe they shouldn't go without water for more than 4 hours, I'm especially concerned during the summer periods this needs special consideration

If horse owners are made aware of these standards and guidelines, then I think it will help those who are new to the industry or are not aware of best practice to have the opportunity to comply.

How will they be informed? Will the information be available at no cost and widely distributed in a public forum? Only those people who put the welfare of their cargo ahead of their deadlines or profit margins will be likely to comply. Will there be adequate resources to police the standards?

I am very passionate about the welfare of all animals to that is why I chose these answers and agree that these requirements and guidelines will work with the transport of horses

Stalls should be larger, lameness score of 3 should also not be considered for transport. Again only use of humane euthanasia should be used if needed.

Time off water for classes currently above this to be reduced to 6 hours and less for foals. Shade a requirement for rest stops. Need to specify temperatures at which cannot be transported to avoid heat/cold stress. Journey times not to exceed 24 hours and 6 hours for foals. No double deck transporting and partitioning to be specified. Guidelines need to be enforceable standards.

The standards outlined do not go far enough in addressing animal welfare standards.

The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs

is truly reflected in these pitiful standards and guidelines.

Some of these Guidelines could/should be Standards

## Pigs

Last year I followed a truckload of pigs from a saleyard in WA. The temperature was 35 degrees and the bulk of pigs had collapsed and were lying on top of one another. I called RSPCA - they did nothing! And the WA AG dept did not want to know about this!!

Plan the trip to be done as quickly as possible

GB 9.1 fresh tail bite should be suitable to transport in separate pen (fresh tail bitten, not extreme).

SB9.4 electric prodders must be allowed (trained operator) especially for OH&S reasons (moving/loading) large pigs.

Blunt Trauma not acceptable. Traumatic hernias etc should not have to be 'touching the ground' to deem an animal unfit for transport any such significant injury should be assessed and treated before it gets to this stage. Space densities much too small

The current standards do not provide for the problems that pigs encounter if transported in hot weather. Pigs are particularly susceptible to heat stress, proper measures need to be taken to avoid this

Animals that are not fit to load should be excluded from transportation, but the measure of fitness can allow quite ill animals to load, for example GB9.1 would allow pigs with hernias so big that they almost touch the ground, to be loaded.

The current standards do not provide for the problems pigs encounter if transported in hot weather. Pigs are particularly susceptible to heat stress, yet this issue is only dealt with in the Guidelines (GB9.8) when the Standards should ensure proper measures are taken

Time off water for classes currently above this to be reduced to 6 hours and less for piglets. Shade a requirement for transport. Need to specify temperatures at which cannot be transported to avoid heat/cold stress. Journey times not to exceed 24 hours and 6 hours for piglets. Guidelines to be enforceable standards

The standards outlined do not go far enough in addressing animal welfare standards

The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual

	<p>animal's needs is reflected in these pitiful standards and guidelines</p> <p>Pigs are very susceptible to heat stress and this is not adequately covered in the Standards. Fewer pigs should be loaded than normal in hot weather. More use of shade cloths, water sprays, mists etc should be considered</p> <p>SB9,2 ii) being a Standard makes GB9.7 superfluous</p>
<b>Poultry</b>	<p>Poultry in WA are loaded by the crateful - trucks rarely have side and the crates are just "roped" together. No one cares how poultry is transported in this state!</p> <p>'exemption' of correct handling are completely unacceptable for breeder bird, geese, ducks and turkeys. Better practises for observing poultry and better methods of identifying unfit animals prior to transport. Not nearly enough room given.</p> <p>The handling of poultry for transport is currently unacceptable with layer and meat hens being permitted to be carried upside down to the transport carriers with up to 5 held in each hand of the catchers.</p> <p>Poultry should not be overcrowded in transportation and should be allowed to sit down</p> <p>Time off water is excessive.</p> <p>SB10.3 Allowing birds to be crated for up to 24 hours is disgraceful. 8 hours should be the maximum.</p> <p>SB10.6 allowing all manner of handling methods (legs, wings, necks, etc) is outrageous. This standard should be deleted. Birds should be picked up by the body, with two hands</p> <p>Layer hens taken from battery cages have very fragile bones and studies have shown many suffer broken bones from being carried upside down especially if handlers are allowed to carry 5 birds in one hand. GB 10.24 similarly allows meat chickens to be carried in this way and they are at risk of hip displacement due to their heavy bodies</p> <p>Time off water for classes currently above this to be reduced to 6 hours and less chicks. Shade a requirement for transport. Need to specify temperatures at which cannot be transported to avoid heat/cold stress. Journey times not to exceed 24 hours and 6 hours for chicks. The handling of poultry for transport is currently unacceptable--with 'spent' layer hens being permitted to be carried upside down to the transport carriers with up to 5 held in each hand of the catchers--see GB 10.25. Layer hens taken from battery cages have very fragile bones and studies have shown many will suffer broken bones from such treatment. GB 10.24 similarly allows meat chickens to be carried in this way and they are at risk of hip displacement due to their heavy bodies. Guidelines to be enforceable standards.</p> <p>the standards outlined do not go far enough in addressing animal welfare standards</p> <p>The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines</p> <p>GB10.24 and GB10.25 involve excessive cruelty to the hens. These birds are already in a pitiful condition with weak and sometimes broken bones. Being carried upside down, five in each hand by the transporter carriers is incredibly inhumane</p>
<b>Sheep</b>	<p>Sheep are probably the most neglected animals in the food chain, on farms, during transport in Saleyards...but are considered a good dollar earner for all Industries (including live export which I'm not suppose to mention)</p> <p>Re GB11.11 - I would like it to be worded -</p> <p>ALL SHEEP AND LAMBS should be transported in vehicles (and/or trailers) with enclosed fronts and provided with protection during weather that could cause heat or cold stress or sunburn.</p> <p>I live close to a major Victorian livestock exchange where DPI personnel are in attendance, and I am constantly distressed to see how many private trailers do not have enclosed fronts and are still allowed to transport sheep and other small animals. In this cold weather the animals are hunched up and must be very cold as well as stressed</p> <p>Bleeding out and blunt trauma both extremely unacceptable means, humane euthanasia should be made available. More minimal space should be provided. Specific feeds need to be identified for 'seasonal conditions'</p> <p>Time off water for classes currently above this to be reduced to 6 hours and less for lambs.</p> <p>Shade a requirement for rest stops. Need to specify temperatures at which cannot be transported to avoid heat/cold stress.</p> <p>Journey times not to exceed 24 hours and 6 hours for lambs.</p> <p>Bleeding out not permitted. Guidelines to be enforceable standards</p> <p>, the standards outlined do not go far enough in addressing animal welfare standards</p> <p>The allowable time in the draft standards for each species of animal to go without food and water, and to be travelling without break, is quite unacceptable. It shows scant regard for each animal, and again confirms their treatment as merely objects of gain to humans that must be made to at least just survive the ordeal of transport so that humans benefit. No regard for the actual animal's needs is reflected in these pitiful standards and guidelines</p> <p>Time off water is too long at all levels. It is extremely cruel, stressful and results loss of condition in the sheep</p> <p>As above these animals are not going to be able to be protected as there are not enough inspectors to supervise in a State as large as W.A. Dragging of sheep is not an issue and electric prodders are allowed. Inadequate water and food and heat suffering</p>

is insufficiently provided for and stock density