

**The Parliament of the Commonwealth of Australia**

**TRANSPORT OF LIVESTOCK WITHIN AUSTRALIA**

**Report by the Senate Select Committee  
on Animal Welfare**

**August 1991**

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# MEMBERS OF THE COMMITTEE

## Appointment of the Committee

The Committee was formed on 17 November 1983 and reappointed on 22 February 1985, 22 September 1987 and 9 May 1990.

## Members

Senator Bryant Burns, Queensland, *Chairman* (from May 1990)

Senator David Brownhill, New South Wales, *Deputy Chairman*  
(from July 1985)

Senator Robert Bell, Tasmania (from May 1990)

Senator Paul Calvert, Tasmania (from September 1987)

Senator Barney Cooney, Victoria (from July 1985)

Senator Nick Sherry, Tasmania (from August 1990)

A list of former members of the Committee appears at Appendix 1 to this report.

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## LIST OF ABBREVIATIONS

ADR	Australian Design Rules
ALTA	Australian Livestock Transporters' Association
ANR	Australian National Railways
ANZFAS	Australian and New Zealand Federation of Animal Societies
DOTC	Department of Transport and Communications
NFF	National Farmers' Federation
RSPCA	Royal Society for the Prevention of Cruelty to Animals



# RECOMMENDATIONS AND MAJOR CONCLUSIONS

## CHAPTER 1: ROAD TRANSPORT - THE REGULATORY FRAMEWORK

### National Perspective

*Recommendation 1:* that the Minister for Primary Industries and Energy and the Minister for Transport and Communications assess current mechanisms for national co-ordination of animal welfare and transport matters. (paragraph 1.16)

*Recommendation 2:* that the Minister for Primary Industries and Energy and the Minister for Transport and Communications establish a national livestock transport consultative committee. (paragraph 1.17)

### Availability and Distribution of Model Codes of Practice

*Recommendation 3:* that the Department of Primary Industries and Energy ensure that the Model Codes of Practice on Animal Welfare and, in particular, the Code on the Road Transport of Livestock are published in a more compact, durable and professional format. (paragraph 1.32)

*Recommendation 4:* that the Minister for Primary Industries and Energy, in conjunction with other members of the Australian Agricultural Council, ensure that these Codes are distributed to all relevant parties. (paragraph 1.33)

### Status of the Model Codes of Practice

*Recommendation 5:* that all State and Territory Governments adopt the Model Codes of Practice and, in particular, the Code on Road Transport of Livestock and give them recognition by regulation under relevant legislation relating to prevention of cruelty to animals. The Committee further recommends that the codes be disallowable instruments and that breaches of the codes, although not actionable as such, may be used as evidence in support of prosecutions under provisions of the principal legislation. (paragraph 1.48)

## **Enforcement of State Legislation**

*Recommendation 6:* that all State and Territory Governments ensure that authorities enforcing legislation relating to prevention of cruelty to animals being transported be given sufficient powers and resources to perform these tasks. (paragraph 1.54)

## **CHAPTER 2: ROAD TRANSPORT - SPECIFIC ANIMAL WELFARE CONCERNS**

### **Transport of Horses in Double-Decked Vehicles**

*Recommendation 7:* that all State and Territory Governments prohibit the transport of horses in double-decked vehicles. (paragraph 2.24)

### **Use of Electric Prods**

*Recommendation 8:* that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, amend the Model of Code of Practice on the Road Transport of Livestock to include:

- Specific limitations on the strength of the current in electric prods;
- Clear instructions on appropriate use of electric prods; and
- Clear guidance on inappropriate use of electric prods.

(paragraph 2.42)

### **Duration of Journeys**

*Recommendation 9:* that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, review the recommendations contained within the Model Codes of Practice relating to duration of journeys involving the transport of livestock. (paragraph 2.51)

## **Livestock Vehicle Accidents**

*Recommendation 10:* that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, include guidelines similar to those set out in the New South Wales Government pamphlet "Livestock Traffic Accidents" into the Model Code of Practice on the Road Transport of Livestock. (paragraph 2.54)

## **Standards for Transport Vehicles, Ramps and Yards**

*Recommendation 11:* that the Australian Agricultural Council and the Australian Transport Advisory Council co-operate in the drafting of a set of national design rules appropriate for the registration of vehicles to be licensed to carry livestock. Once drawn up, the rules could be administered in parallel with Australian Design Rules. (paragraph 2.60)

## **Loading Densities**

*Recommendation 12:* that research into optimum density loading and other aspects of the conditions associated with the transport of livestock should be extended. (paragraph 2.71)

*Recommendation 13:* that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, review the loading densities recommended in the Model Code of Practice on Road Transport of Livestock. Upon completion of this review densities should be set out in the Code with stated margins for flexibility and applied nationally. (paragraph 2.72)

## **CHAPTER 3: ROAD TRANSPORT - VOLUME LOADING OF LIVESTOCK**

### **Optimum Density Loading**

*Recommendation 14:* that the Minister for Primary Industries and Energy and the Minister for Transport and Communications, through appropriate inter-governmental bodies:

- (i) seek uniform road transport regulations which would permit vehicles carrying livestock to be loaded to optimum density and exempt such vehicles from regular and random weight checks.

- (ii) propose that, if all governments cannot agree to the removal of weight limits for semi-trailers of standard length when carrying livestock, regulations specifying such maximum length and tare weight be introduced as would result in average or typical laden weights falling within the current weight limits. (paragraph 3.37)

### Provisions of Pens

*Conclusion:* The Committee supports the recommendation of the Inter-State Commission that the provision of pens be mandatory under a system of volume loading. (paragraph 3.44)

### Overloading

*Conclusions:* In the Committee's view, market forces alone cannot yet be relied upon to safeguard the welfare of animals during transport. The Committee considers that more direct sanctions are required to ensure that volume loading, or optimum density loading as it prefers to call it, should not be an open invitation to overload.

The Committee considers that a national approach to volume loading should not be adopted until stricter regulatory arrangements safeguarding the welfare of animals being transported are put in place. The Committee has addressed ways to achieve this objective in Chapter 1 of this report. (paragraphs 3.47 and 3.48)

## CHAPTER 4: ROAD TRANSPORT - TRAINING, LICENSING AND ACCREDITATION

### Training

*Recommendation 15:* that Commonwealth, State and Territory Governments, rural and producer organisations and transport industry associations promote training programs to extend the knowledge and skills of those who handle livestock during transport. In addition to special driving techniques, these programs should include training in all aspects of the Model Code of Practice on the Road Transport of Livestock. (paragraph 4.20)

## Licensing

*Recommendation 16:* that all drivers of vehicles carrying livestock as part of a commercial transport enterprise should be properly trained and possess a suitably endorsed vehicle driving licence. This will ensure that those offering services in the livestock transport industry have undertaken an accepted form of training or have demonstrated a specified level of competence in livestock handling. (paragraph 4.22)

## Accreditation

*Conclusions:* The Committee welcomes the initiatives of the Australian Livestock Transporters' Association to promote self-regulation within the industry. In particular, the Committee considers that the Association should extend its commitment to training of drivers in the proper care and handling of stock.

The Committee welcomes programs that will improve the welfare of animals by raising industry standards and encouraging a more professional approach within the industry. (paragraphs 4.38 and 4.39)

## CHAPTER 5: RAIL TRANSPORT

### Current Rail Services - Alice Springs to Adelaide

*Recommendation 17:* that Australian National Railways take positive measures to encourage owners of livestock or their agents to provide train drovers for consignments of stock on ANR services. (paragraph 5.24)

*Recommendation 18:* that Australian National Railways review the operation of Train No. 7166 in order to ascertain whether transit times can be reduced. (paragraph 5.32)

### Rail Transport

*Conclusions:* Evidence to the Committee indicates that there is a continuing, but, reduced role for rail in the transport of livestock. The use of rail transport is also becoming confined to specialised services and specific routes.

The Committee considers that the welfare of animals being transported by rail will be enhanced if the period of transport is as short as possible. Accordingly, the Committee encourages all rail authorities, involved in the transport of livestock, to improve total transit times, including loading, shunting and unloading, running speeds and to reduce the number of stops. (paragraphs 5.42 and 5.43)

## **CHAPTER 6: SEA TRANSPORT**

### **Commonwealth Legislation**

*Recommendation 19:* that the Department of Transport and Communications accord priority to the promulgation of amendments to Marine Orders Part 43, (Cargo and Cargo Handling - Livestock) pursuant to the Navigation (Orders) Regulations under the *Navigation Act 1912*. (paragraph 6.10)

### **Operational Matters**

*Recommendation 20:* that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, ensure that properly trained personnel, experienced in stock handling, load and unload animals involved in transport by sea. (paragraph 6.17)



## PREFACE

### Terms of Reference

The Select Committee on Animal Welfare was established by resolution of the Senate on 17 November 1983 to inquire into and report upon the following matter:

the question of animal welfare in Australia, with particular reference to:

- (a) interstate and overseas commerce in animals;
- (b) wildlife protection and harvesting;
- (c) animal experimentation;
- (d) codes of practice of animal husbandry for all species; and
- (e) the use of animals in sport.

To date, the Committee has presented nine reports to the Senate, namely:

Export of Live Sheep from Australia	1985
Dolphins and Whales in Captivity	1985
Kangaroos	1988
Animal Experimentation	1989
Sheep Husbandry	1989
Intensive Livestock Production	1990
The Racing Industry (Interim)	1990
The Culling of Large Feral Animals in the Northern Territory	1991
Equine Welfare in Competitive Events other than Racing	1991

On 31 May 1990, the Senate resolved that the Committee should inquire into and report upon the implications for animal welfare of the transport of livestock within Australia. The Senate also resolved that the Committee should present its report on or before the last sitting day of the Autumn sittings in 1991.

On 20 June 1991, the Senate extended the time for the presentation of the report to 30 August 1991.

### **Conduct of the Inquiry**

The Committee sought submissions by advertisement in major newspapers and by letter to interested parties. In response, the Committee received 31 submissions. A list of organisations and individuals that lodged submissions with the Committee appears at Appendix 2.

The Committee held thirteen public hearings. These were as follows:

Darwin:	21 November 1990
Alice Springs:	22 November 1990
Sydney:	30 November 1990
Canberra:	10 December 1990
Melbourne:	14 December 1990
Canberra:	17 December 1990
Canberra:	11 March 1991
Sydney:	27 March 1991
Adelaide:	23 April 1991
Peterborough:	24 April 1991
Rockhampton:	20 May 1991
Brisbane:	21 May 1991
Canberra:	17 June 1991

The witnesses who appeared at these hearings are listed in Appendix 3.

Members of the Committee received briefings on feral horses from officers of the Conservation Commission of the Northern Territory in Alice Springs and inspected habitats of feral horses in central Australia. The Committee inspected the unloading of cattle from a road train and the loading of cattle at the railway yards at Roe Creek, Alice Springs. Members also visited the abattoir at Peterborough in South Australia where both feral and domesticated horses are slaughtered for the export horse-meat trade. The Committee visited the Gracemere saleyards at Rockhampton in Queensland, where about 1,000 cattle were received and sold during the inspection.

## Scope of the Inquiry

In this inquiry, the Committee confined its attention to the commercial transport of farm livestock.

The Committee received no submissions and very little evidence on the transport of livestock by air. In the absence of such representations, the Committee can only assume that the costs and specialised services associated with this mode of transport ensure that the welfare of animals is protected.

## Acknowledgements

The Committee expresses its appreciation to those who made written submissions to the inquiry and who co-operated with the Committee by giving public evidence. Those who made submissions but did not appear at public hearings may be assured that their submissions have been taken into account in the writing of this report.

The Committee is grateful for the assistance of those who arranged inspections and conducted briefings. In particular, the Committee thanks Mr Peter Priem of Rockhampton and Mr Peter Hubbard of Peterborough.

Bryant Burns  
*Chairman*

The Senate  
Canberra  
August 1991



# INTRODUCTION

## Legislative Framework

The legislative framework governing the transport of livestock within Australia is not extensive. In general, the Commonwealth's responsibilities extend to interstate shipping, interstate railways and air transport. The States and Territories are primarily responsible for road transport and intra-state rail transport. The States and Territories also legislate on matters relating to animal welfare.

## Four Fundamental Considerations

Transport necessarily constitutes a major component in the production and marketing of livestock, involving annual expenditure of almost \$500 million, or around 10 per cent of total costs. Livestock are moved in large numbers both between farms to adjust stock levels in the light of varying climatic and marketing conditions and as the final link in the production chain from farm to abattoir or point of export.

In considering transport and animal welfare, four fundamental considerations emerged during the inquiry.

Firstly, every step in the process of transporting livestock may result in stress, injuries or even death to the animals. These may occur as a result of:

- mustering, sometimes over great distances, and sometimes involving animals that have had no previous human contact;
- mixing with unfamiliar beasts, requiring the establishment of new social relationships;
- confinement in holding yards, possibly for the first time;
- the noise and confusion associated with loading and unloading;
- physical contact with fencing, ramps and vehicles;

- close confinement in vehicles for periods of up to 24, 36 or even 48 hours with no food or water and very restricted movement; and
- the discomforts of travel itself, such as exposure to the elements, rough roads, dust and the starting, stopping and turning of vehicles.

It is therefore appropriate that the welfare of animals should be examined and, if necessary, improved at each of these stages of transport.

Secondly, animal welfare and economic considerations are not mutually exclusive. Costs incurred in improving welfare will be offset to varying degrees by higher unit returns. As noted above, transport of livestock may result in stress, injury or death to an animal. In these cases, there is a direct economic loss to the owner in the form of financial penalties imposed for bruising or other injuries and outright loss in the case of death during transport. Thus, there is a strong financial incentive to reduce stress, injuries and losses that accompany the transport of livestock. Economic returns can be increased by sound animal welfare practices.

Thirdly, although rules and regulations may be applied to every stage of the transport process, the welfare of animals is determined primarily by the level of care and responsibility demonstrated by individuals involved in the process.

Fourthly, animal welfare will be improved by any measures that reduce either the length or the number of journeys. One example of this is the bypassing of saleyards through direct selling by producers to abattoirs. Indeed, 50 per cent of the cattle and 30 per cent of the sheep purchased by abattoirs are supplied directly from producers. Direct selling to abattoirs reduces the number of journeys as well as the overall time in transit and has the added advantage of monitoring the welfare of animals during each stage of the process. Growers have a strong incentive to deliver stock in the best possible condition, knowing that revenue deductions for bruising will be made and notified to them. This procedure encourages producers to promote the welfare of animals during transport. Professional drivers who cause injuries to stock may be identified enabling prompt corrective action to be taken. Therefore, all parties have a strong economic incentive to exercise the utmost care in loading, transport and unloading, with commensurate welfare benefits to

the animals. Computer-Aided Livestock Marketing (CALM) is another recent development that also reduces the transport task. Under this system, stock are mustered on the farm and their descriptions fed into a database which can be accessed by potential purchasers. It offers the benefit of an auction system without the necessity of transporting stock to saleyards. Again the main benefit to welfare is the reduction in the number of journeys.





# CHAPTER 1

## ROAD TRANSPORT - THE REGULATORY FRAMEWORK

### Introduction

1.1 All contributors to the inquiry recognised the overwhelming importance of road transport to livestock industries. In the past, rail played a significant role in transporting livestock. This role, however, has diminished considerably over the last few years. The Committee was advised that road transport is increasingly the dominant mode used for the domestic transport of livestock. Dr Peter Barnard, appearing on behalf of the Cattle, Sheepmeat and Wool Councils (Producer Councils), told the Committee that 90 per cent of domestic livestock transport is carried by road or a combination of road and rail.<sup>1</sup>

1.2 The Australian Livestock Transporters' Association (ALTA) supplied the Committee with information that illustrates the nature and extent of road transport of livestock in Australia. This information appears on the following two pages.

1.3 In this chapter of the report, the Committee reviews the role of the Commonwealth, State and Territory governments in the control of the transport of livestock by road and relevant regulatory arrangements.

### Role of the Commonwealth Government

1.4 The role of the Commonwealth Government in providing funding for road construction is well known. The Commonwealth Government, through participation in the Australian Transport Advisory Council, also encourages a national perspective on matters such as road safety, vehicle standards and certification. For example, the *Motor Vehicle Standards Act 1989*, provides for the establishment of Australian Design Rules (ADR) for road vehicles. ADRs prescribe uniform standards for transport vehicles and, in particular, address safety and environmental considerations. Vehicles carrying livestock must conform to ADRs. These rules, however, do not address animal welfare aspects of vehicle or trailer design.<sup>2</sup>

1.5 The Commonwealth Government's role in animal welfare is limited. The Commonwealth is concerned with international aspects of animal welfare and can take action under relevant legislation to protect the

Table 1: Livestock Movements by Origin and Destination 1986

<u>Destination</u>	<u>Origin</u>		
	Farm	Saleyard	Total
	%	%	%
Farm	10	20	30
Saleyard	37	...	37
Abattoir	15	15	30
Live Export	1	2	3
<b>TOTAL</b>	<b>63</b>	<b>37</b>	<b>100</b>

Source: *Evidence*, Australian Livestock Transporters' Association, p. 894.

Table 2: Livestock Movements by Commercial Livestock Transporters and Primary Producers: 1985

(Million Tonne-Kilometres)

State	Livestock Transporters	Primary Producers	Total	% Carried by Commercial Transporters
NSW	709	315	1025	69
VIC	422	164	586	72
QLD	599	345	944	63
SA	152	146	298	51
WA	394	161	556	71
TAS	25	19	44	57
NT	226	212	438	52
ACT	5	55	60	8
<b>AUST</b>	<b>2530</b>	<b>1364</b>	<b>3894</b>	<b>65</b>

Source: *Evidence*, Australian Livestock Transporters' Association, p. 896.

Table 3: Livestock Movements by Vehicle Type: 1985

(Millions Tonne-Kilometres)

*Small Trucks Less Than  
4 Tonnes*

*Articulated Trucks  
Greater than 16 Tonnes*

State	Livestock Transp.	Primary Prods.	% Carried by Livestock Transp.	Livestock Transp.	Primary Prods.	% Carried by Livestock Transp.
NSW	17	42	29	581	104	85
VIC	7	26	21	338	30	92
QLD	10	14	42	565	171	77
SA	0	5	0	121	106	53
WA	0	9	0	370	70	84
TAS	0	2	0	15	1	94
NT	0	0	0	219	184	54
ACT	0	0	0	0	0	0
AUST	26	100	21	2213	669	77

Source: Evidence, Australian Livestock Transporters' Association, p. 897.

Table 4: Livestock Transporting Task by Livestock Type  
and State and Territory: 1985

*% Composition*

State	Cattle	Sheep	Pigs
NSW	44	52	4
VIC	65	32	3
QLD	92	7	1
WA	42	55	3
SA	29	63	8
TAS	69	30	1
NT	100	0	0
AUST	68	30	2

Source: Evidence, Australian Livestock Transporters' Association, p. 898.

welfare of animals being exported or imported and livestock within export slaughter facilities. It also facilitates the development of a national perspective on animal welfare issues.

### **Role of State and Territory Governments**

1.6 The States and Territories role in transport and animal welfare is more pervasive. All States and Territories have enacted legislation relating to the prevention of cruelty to animals. Usually, cruelty is defined in general terms, with cruelty to animals as a punishable offence. Only two States have principal legislation on the prevention of cruelty to animals that refers specifically to the transport of livestock.

1.7 In South Australia, Regulations under the *Prevention of Cruelty to Animals Act* require persons transporting livestock to comply with Codes of Practice as published in the Gazette from time to time.<sup>3</sup> In Victoria, the *Prevention of Cruelty to Animals Act 1986* deals with overcrowding and ill-treatment of animals during transport.<sup>4</sup>

1.8 Other States have addressed specific issues relating to animal welfare and transport. For example, in New South Wales, the carriage of horses on double-decked vehicles is banned.<sup>5</sup> In Queensland, vehicles carrying livestock have been exempted from all weight limitations, subject to certain technical specifications on safety. This has resulted in the introduction of a system known as volume loading of livestock in that State.<sup>6</sup>

1.9 States and Territories also enact legislation relating to motor vehicles, roads and other aspects of road transport. For example, there are differing provisions on the use of multiple-trailer vehicles, such as B-doubles and road trains in States and even in parts of States. While based on considerations of safety and pavement damage, these controls affect animal welfare insofar as they may lead to longer, and therefore more stressful journeys to circumvent areas where restrictions apply.

### **National Perspective**

1.10 During the inquiry, several witnesses recognised that a national perspective on the transport of livestock, particularly by road, needs to be developed and encouraged.

1.11 The Royal Society for the Prevention of Cruelty to Animals, Australia, (RSPCA Australia), provided the Committee with the following view of the current legal and regulatory framework for the welfare of livestock being transported:

It is clear that within the Australian Federation there are vastly different Acts and other requirements, such as codes of practice, relating to the welfare of animals. Principally there are the Prevention of Cruelty to Animals Acts in each State. In some States, these Acts have attached to them codes of practice, which have either been developed within the State concerned, or alternatively, are based upon and sometimes modified from national standards developed by the Australian Agricultural Council ... While there are a number of agreed codes of practice relating to the transport of animals by sea, by air, by rail and road, in Australia, it appears that the implementation of these codes of practice has varied markedly.<sup>7</sup>

1.12 Dr Hugh Wirth, President of RSPCA Australia, recommended that a national peak council be established to co-ordinate issues relating to the transport of livestock. Dr Wirth informed the Committee that the Department of Transport and Communications for some time has had an advisory committee for the sea transport of livestock and that this committee provided an important forum for co-ordination.<sup>8</sup> Dr Wirth described the role of such a national advisory committee in the following terms:

It is not the Commonwealth Government dictating, but rather the Commonwealth Government discussing with all the groups responsible for ... transport of animals, the problems of animal welfare and how they can be fixed. It is a practical example of how the Commonwealth acts as an honest broker.<sup>9</sup>

1.13 A similar view was expressed by the Australian and New Zealand Federation of Animal Societies (ANZFAS). The Federation observed that Federal authorities are "reluctant to accept responsibility for any facet of livestock transport within Australia" even though large numbers of animals are transported across State and Territory borders.<sup>10</sup> Ms Glenys

Oogjes, Director of ANZFAS, summarised the Federation's view when she stated:

Primarily, we need from the [Select] Committee some direction for uniform and enforceable standards across States and Territories.<sup>11</sup>

1.14 Producer Councils and transport organisations also recognised that national co-ordination is necessary for aspects of livestock transport. In particular, these organisations stressed the need for national transport standards and, in particular, volume loading, as well as a uniform approach to design standards for equipment and loading facilities.

1.15 The Committee recognises that the regulation and control of livestock transport is complex and, even within one State, may involve several Government departments. Developing a national perspective on livestock transport involves many more interested parties. Nonetheless, the Committee considers that every effort should be made to develop and implement a national perspective on animal welfare and transport.

*1.16 The Committee recommends that the Minister for Primary Industries and Energy and the Minister for Transport and Communications assess current mechanisms for national co-ordination of animal welfare and transport matters.*

*1.17 The Committee further recommends that the Minister for Primary Industries and Energy and the Minister for Transport and Communications establish a national livestock transport consultative committee.*

#### **Uniform Approach - Model Code of Practice for the Road Transport of Livestock**

1.18 In 1983, the Australian Agricultural Council, comprising Commonwealth, State and Territorial Ministers responsible for agriculture, approved a series of Model Codes of Practice for the Welfare of Animals.

1.19 The Codes cover a wide range of activities within the livestock industries and several relate to the transport of livestock. The third Code within the series covers Road Transport of Livestock. The Committee reproduces this important code as Appendix 4.

1.20 The Code on Road Transport of Livestock emphasises the responsibilities of the owner of the animals and of the driver. It recognises that transporters have a responsibility to get animals to their destination as speedily as possible and to minimise any adverse effects on them. Good management and careful driving are identified as important factors in the welfare of animals carried by road. The Code addresses specific issues such as:

- assembly and selection of stock for transport;
- recommended standards for transport vehicles;
- design and construction of ramps for holding yards;
- loading and unloading of animals; and
- duration of journeys and rest stops.

1.21 Appendices to the Code provide information on recommended loading densities for individual species of livestock as well as other information on food and water requirements and methods for the humane destruction of livestock during the transport process.<sup>12</sup>

1.22 The Committee welcomes statements by Dr Geoffrey Neumann, convenor of a working group revising this and other codes that, in future, separate codes will be issued for cattle, horses, pigs, sheep, poultry and deer. Dr Neumann advised the Committee that the revised codes will be published in 1992.<sup>13</sup>

#### Views on the Code

1.23 Evidence to the Committee indicates that there is general acceptance of the Code by animal welfare, primary producer and road transport groups.<sup>14</sup> In its submission, the Australian Pig Industry Policy Council summarised the views of several contributors when it stated that "the model code provides an extremely useful and relevant guideline to the producer, and to the other industries involved in the chain from farmgate to slaughter."<sup>15</sup>

1.24 The Australian Livestock Transporters' Association has adopted its own "Code of Practice for the Road Transport of Livestock".<sup>16</sup> This code has similar coverage to the Model Code but does vary in significant respects, including lower loading densities than those recommended in the Model Code.

## Availability and Distribution of the Code

1.25 The Committee is concerned that organisations and individuals such as transport companies and drivers are unfamiliar with the provisions of the Code and in some instances are unaware of its existence. This is not surprising, as the Committee received ample evidence that the Model Code on the Road Transport of Livestock has not been distributed widely.

1.26 In its submission, RSPCA Australia stated that "it is clear that within the road transport industry there is a massive ignorance of codes of practice". The Society added:

All the work attached to the development of codes of practice may well end up wasted if it proves that industry itself does not adopt them or that information is not readily available to the operators of stock transports throughout the land.<sup>17</sup>

1.27 Ms Glenys Oogjes, Director of ANZFAS, expressed the view that "many operators would not ... even know of the existence of the code, let alone what was involved in it and what their responsibilities were".<sup>18</sup>

1.28 Dr Graeme Eldridge, of the Victorian Department of Agriculture and Rural Affairs, expressed similar views, commenting that "some groups are not even aware that the code of practice exists".<sup>19</sup> Dr Neumann, from the South Australia Department of Agriculture, observed that "you could probably count on one hand the number [of drivers] that have actually read the code".<sup>20</sup>

1.29 The Committee also heard evidence on the distribution of the code. For example, Mr Robert Levy, Executive Director of the Australian Council of Livestock Agents, commented:

I do not believe that the code has been widely enough distributed ... the code should start right back on the property... the code should be part of the kit ... of every agent ... every livestock transport operator and every abattoir operator".<sup>21</sup>

1.30 Several reasons were advanced on why the code has not been distributed widely. Mr Brian Healy, of the New South Wales Department



of Agriculture and Fisheries told the Committee that, when the Department attempted to distribute the Road Code, "there was not the industry infrastructure or willingness to push it further amongst their own members".<sup>22</sup>

1.31 The Committee considers that the effective dissemination of the code should begin with its physical presentation. Current copies of the Code consist of 26 one-sided typed pages on A4 paper stapled within soft covers. This format is not inviting, convenient to handle and store or durable. In the Committee's view, a format using double-sided gloss board, no larger than A5 and enclosed in a hard-covered, loose-leaf binder would be more effective.

*1.32 The Committee recommends that the Department of Primary Industries and Energy ensure that the Model Codes of Practice on Animal Welfare and, in particular, the Code on the Road Transport of Livestock are published in a more compact, durable and professional format.*

*1.33 The Committee further recommends that the Minister for Primary Industries and Energy, in conjunction with other members of the Australian Agricultural Council, ensure that these Codes are distributed to all relevant parties.*

#### **Status of the Model Code of Practice**

1.34 The Preface to the Model Code of Practice on Road Transport of Livestock states that "it is intended as a model to enable the States to develop codes of practice to meet their individual needs."<sup>23</sup>

1.35 Officers of the South Australian Government advised the Committee that the Model Codes of Practice relating to Road and also Rail, adopted by the Australian Agricultural Council, have been incorporated into regulations under the State's Prevention of Cruelty to Animals Act.<sup>24</sup> Ms Joyleen Farrelly explained the role of the Codes when incorporated into State regulations:

The way that the regulations to this Act are policed is that the people are initially warned for minor infringements. It is used so as to be educational as well. In cases where the stock is obviously in bad condition the code is likely to be used in a court of law to support a prosecution under the section of the

Prevention of Cruelty to Animals Act - the miscellaneous cruelty provisions.<sup>25</sup>

1.36 Ms Farrelly told the Committee that any changes to the Model Codes would be incorporated into the regulations as necessary.<sup>26</sup>

1.37 In other States and Territories, the model code of practice has not been given this status and compliance with its provisions is voluntary.

1.38 In evidence to the Committee on the status of the Codes, animal welfare and veterinary organisations favour giving the codes legal force. Dr Hugh Wirth, President of RSPCA Australia, made the following observation:

RSPCA is a great advocate of codes of practice but we go one step further: that state legislation ought to gazette the relevant parts of these nationally approved codes under the cruelty legislation.<sup>27</sup>

1.39 The Australian and New Zealand Federation of Animal Societies expressed a similar view. In its submission to the Committee, the Federation recognised that giving force of law to the code would result in at least one important benefit. ANZFAS stated:

If the existing codes became statutes, bodies such as the police, government stock instrumentalities and animal welfare organisations could assess the effect of legislation and put forward recommendations for changes.<sup>28</sup>

1.40 Organisations representing primary producers and road transporters argued strongly for self-regulation rather than government regulation. For example, the Producer Councils told the Committee that they are opposed to codes of practice "being written into legislation".<sup>29</sup>

1.41 Appearing at a public hearing on behalf of these Councils, Dr Peter Barnard, Director of Transport, National Farmers' Federation (NFF), stated:

It is our firm view that those guidelines must remain as that: just guidelines ... it would be quite inappropriate to ensconce those codes of practice in legislation.<sup>30</sup>

1.42 Similarly, the Australian Pig Industry Policy Council considered it "inappropriate that such model codes be enshrined in legislation".<sup>31</sup>

1.43 Reservations were also expressed about practical effects of such a move. Mr David Skinner, representing the Australian Council of Livestock Agents, told the Committee that "the mandatory application of guidelines under any code of practice for the welfare of animals could prove unworkable."<sup>32</sup>

1.44 Other propositions advanced in favour of a self-regulatory approach in applying the Codes included:

- the desirability of keeping the regulation of business to a minimum;
- the economic incentive to deliver stock in good condition to saleyards or abattoirs;
- the need for flexibility; and
- the empathy for animals inherent in the pastoral lifestyle.

1.45 The Committee found it difficult to reconcile views on the status that should be accorded to the model codes of practice and, in particular, the Code of Practice on the Road Transport of Livestock.

1.46 Having considered the conflicting evidence on this matter, the Committee is attracted to the approach adopted in South Australia of incorporating the Codes into regulations under the principal animal welfare Act.

1.47 Under the South Australian provisions, prosecutions for cruelty continue to be carried out under the general provisions of the animal welfare Act. Nevertheless, breaches of the Code, as incorporated into regulations, may be invoked as evidence of cruelty.

*1.48 The Committee recommends that all State and Territory Governments adopt the Model Codes of Practice and, in particular, the Code on Road Transport of Livestock and give them recognition by regulation under relevant legislation relating to prevention of cruelty to animals. The Committee further recommends that the codes be disallowable instruments and that breaches of the codes, although not actionable as such, may be used as evidence in support of prosecutions under provisions of the principal legislation.*

1.49 The Committee considers that the incorporation of the codes into regulations would facilitate prosecutions in cases where genuine cruelty has occurred.

1.50 The Committee notes that a similar approach to the status of a code practice was adopted in the *Occupational Health and Safety (Commonwealth Employment) Act 1991*.

### **Enforcement of State Legislation**

1.51 Generally, State and Territory legislation on the prevention of cruelty to animals is enforced by police or inspectors from the Royal Society for the Prevention of Cruelty to Animals.

1.52 According to RSPCA Australia, the effectiveness of this system is less than it should be. In discussing the different legislative approaches adopted by the States and Territories, the Society commented:

Some of the variations within the States relate to the abilities and powers of RSPCA inspectorial staff to examine the transported animals. In NSW, powers are provided to enable inspectors to stop trucks carrying livestock and to direct them (if necessary), to unload at the nearest saleyards or other facilities and to correct the problem. However, in other States these powers don't exist or, if they do exist, they require the use of other powers that are given to either police or alternatively to the Transport Authority personnel within that State. The difficulty with this latter process is, as with all animal welfare crises, the time delay in getting assistance from the police, or traffic authorities. Such time is often not available to prevent the damage or death of large numbers of animals. Inspectors may fail to alleviate suffering in time because of the need to get the approval and support of other authorities.

In the light of this, RSPCA Australia recommends the introduction of uniform State powers to enable RSPCA inspectorial staff to stop road transport vehicles and inspect the loads and if necessary to unload those transports at the nearest saleyards to correct the animal welfare defects.<sup>33</sup>

1.53 The Committee is of the view that, police and, where appropriate, RSPCA inspectors must have the authority to perform tasks efficiently and effectively.

1.54 Accordingly, *the Committee recommends that all State and Territory Governments ensure that authorities enforcing legislation relating to prevention of cruelty to animals being transported, be given sufficient powers and resources to perform these tasks.*

## ENDNOTES

1. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 468.
2. *Evidence*, Department of Transport and Communications, p. 356.
3. *Evidence*, South Australian Government, p. 614.
4. *Prevention of Cruelty to Animals Act*, (Vic.) 1986. Sections 6(c) and 7(1)(a).
5. *Evidence*, New South Wales Department of Agriculture and Fisheries, p. 548.
6. *Evidence*, Queensland Department of Transport, p. 753; p. 757.
7. *Evidence*, RSPCA Australia, pp. 67-68.
8. *ibid.*, p. 144.
9. *ibid.*
10. *Evidence*, Australian and New Zealand Federation of Animal Societies, p. 180.
11. *ibid*, p. 238.
12. Australian Agricultural Council, *Model Code of Practice for the Welfare of Animals - Road Transport of Livestock*, Canberra, 1983, pp. 10-26.
13. *Evidence*, South Australian Government, p. 613; p. 634.
14. *Evidence*, Australian Equine Veterinary Association, p. 41.  
*Evidence*, Australian Council of Livestock Agents, p. 255.  
*Evidence*, Cattle, Sheepmeat and Wool Councils, p. 445; p. 465.
15. *Evidence*, Australian Pig Industry Policy Council, p. 503.
16. *Evidence*, Australian Livestock Transporters' Association, p. 889.
17. *Evidence*, RSPCA Australia, p. 68; p. 75.

18. *Evidence*, Australian and New Zealand Federation of Animal Societies, p. 238.
19. *Evidence*, Victorian Department of Agriculture and Rural Affairs, p. 312.
20. *Evidence*, South Australian Government, p. 620.
21. *Evidence*, Australian Council of Livestock Agents, p. 263.
22. *Evidence*, New South Wales Department of Agriculture and Fisheries, pp. 553-554.
23. Australian Agricultural Council, *op. cit.*, p. 1.
24. *Evidence*, South Australian Government, p.614.
25. *ibid.*
26. *ibid.*
27. *Evidence*, RSPCA Australia, p. 159.
28. *Evidence*, Australian and New Zealand Federation of Animal Societies, p. 171.
29. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 465; p. 469; p. 470.
30. *ibid.*
31. *Evidence*, Australian Pig Industry Policy Council, p. 503.
32. *Evidence*, Australian Council of Livestock Agents, p. 259.
33. *Evidence*, RSPCA Australia, p. 67.





## CHAPTER 2

### ROAD TRANSPORT - SPECIFIC ANIMAL WELFARE CONCERNS

#### Introduction

2.1 If properly planned, managed and conducted, the transport of livestock by road can be achieved with a minimum of stress or injury to the animals. This mode of transport, however, can pose serious threats to the welfare of animals, sometimes resulting in unnecessary suffering and even death of livestock.

2.2 During the inquiry, specific concerns were expressed about the welfare of animals being transported by road. These concerns relate to:

- transport of horses in double-decked vehicles;
- use of electric prods during loading and unloading;
- duration of journeys;
- livestock vehicle accidents;
- impact of specific transport regulations;
- standards for transport vehicles, ramps and yards; and
- loading densities.

#### Transport of Horses in Double-Decked Vehicles

2.3 After a series of incidents involving severe injuries to horses carried in double deckers, the New South Wales Parliament in 1987 amended its *Prevention of Cruelty to Animals Act* to prohibit the transport of horses in these vehicles.<sup>1</sup> In its submission to the Committee, the State Government recommended that double-decked transport of horses be prohibited in all States and Territories. In support of this recommendation, the State Government argued:

Horses on the lower deck [of a double-decked trailer] are unable to adopt a normal head carriage. Horses are forced to hold their heads at or below the level of their withers [shoulders]. This necessitates extension of the dorsal muscles (stretching of the top muscles of the neck) for prolonged periods in the case of long distance transport. An opinion on the effects of this type of head carriage was sought from Dr Rex Butterfield, former Professor of Veterinary

Anatomy at Sydney University and President of the Australian Equine Research Foundation. Dr Butterfield said this position would cause great discomfort to horses forced to maintain it for extended periods. He added that it would also make it difficult for a horse to maintain equilibrium when the natural tendency when unbalanced is to elevate the head.

Severe head injuries, including skull fractures, eye injuries and deep lacerations, are frequently sustained by horses travelling on the top decks of trucks - due to the horses being hit by overhanging branches, etc.<sup>2</sup>

2.4 Officers of other State Government Departments or agencies appearing before the Committee also expressed concerns about the welfare of horses being transported in double-decked vehicles. For example, Dr Mary Barton, Chairman of the South Australian Animal Welfare Advisory Committee, described the practice as "untenable" because horses are transported over long distances with their heads down.<sup>3</sup>

2.5 The position adopted by the New South Wales Government is also supported by animal welfare organisations. RSPCA Australia's policy statement maintains that the Society "will only accept the transport of horses in single deck vehicles especially designed for the needs of the species carried".<sup>4</sup> Similarly, ANZFAS opposes the use of double-decked vehicles for horses.<sup>5</sup>

2.6 Representatives of other organisations appearing before the Committee were opposed to the use of double deckers for horses. These included Mr Michael Clark, of the Australian Council of Livestock Agents<sup>6</sup> and Dr Lex Carroli and Mrs Ruth Wade, speaking on behalf of the Cattlemen's Union.<sup>7</sup>

2.7 Other witnesses were not as adamant about the adverse effect of double-deckers on the welfare of horses. While critical of the use of double-deckers on welfare grounds, officers of the Northern Territory Department of Primary Industry and Fisheries advocated continuance of the practice on economic grounds.<sup>8</sup>

2.8 The submission of the Australian Equine Veterinary Association stated that "there should be enough head room in double-decked

transporters for the horses to travel comfortably". The Association, however, did not specify how much head room is required.<sup>9</sup>

2.9 Mr Peter Hubbard, Manager of Metro Meat Limited's horse-meat abattoir at Peterborough, South Australia, maintained that, if crates are suitably adapted, double decking of horses should be permitted.<sup>10</sup>

2.10 The Committee also received documentary evidence supporting the use of double-decked vehicles to transport horses. Mr John Lapworth, an officer of the Queensland Department of Primary Industries, submitted a study based on his observation of the transport of one double-decked load of horses over a 1,100km journey.

2.11 Mr Lapworth reported that horses were inspected and drafted according to size by an experienced driver, carefully loaded and inspected regularly during the journey. A special permit had been obtained to modify the double-decked trailer, increasing its height over the legal limit of 4.6m. This allowed deck clearances to be raised to 172.5cm, 5cm above the State guideline of 167.5cm. The journey was successful and the animals delivered without any injuries.<sup>11</sup>

2.12 Mr Lapworth concluded from this study that "horses can be carried safely and with care in double deck transport, provided there is sufficient clearance to allow the horses to stand comfortably and horses are drafted on height before transport". Mr Lapworth added that "horses do not need to travel with their heads held high".<sup>12</sup>

2.13 As mentioned above, the crate used in the study had been modified and operated under special permit in relation to height. Careful attention was given to planning and supervision, including drafting according to size and observance of density requirements. The journey of 1,100km took nearly 24 hours with frequent inspections.

2.14 The Committee considers that it is unlikely that these ideal conditions would be met consistently in practice.

2.15 The Committee reviewed other information presented during the inquiry in order to ascertain whether horses can be transported on conventional double-decked vehicles without compromising their welfare.

2.16 Usually, the deck clearances on double-decked stock crates range from 155cm to 162.5cm. Indeed, the New South Wales Government advised the Committee that the average deck clearance of a stock crate is 157cm.<sup>13</sup>

2.17 If such a stock crate were used to transport horses, an average-sized horse of 15 hands, or 152.5cm, would have about 2.5cm to 10cm (one to four inches) above the withers for head movement on entering, standing within, and leaving the crate. A 16-hand horse - 162.5cm - would find it impossible to stand in the average sized crate, even with its head lowered.

2.18 The Committee is aware that the Queensland Government has drafted Guidelines for the Road Transport of Horses that include stricter guidelines on the transport of horses by double-deck vehicles. These guidelines state that horses of 15 hands or less can be carried safely in a double-deck trailer with a deck clearance of 167.5cm. Mr Lapworth, from the Queensland Department of Primary Industries, advised the Committee that if vehicles comply with the guidelines and competent stockmen are in charge, "double-deck transport of horses is at least equal welfare wise to single deck transport and, in some aspects, superior".<sup>14</sup>

2.19 Even if a trailer is constructed or modified to obtain a deck clearance of 167.5cm, as recommended in the *Queensland Government Guidelines for the Transport of Horses*, the Committee is still concerned that the clearance over the withers of a 15-hand horse would be about 15cm (six inches) only.

2.20 In the Committee's view, these Guidelines on double-decked transports do not overcome the animal welfare problems posed by these vehicles. The Committee does not regard the recommended clearance as adequate, especially when the potential for serious head injuries during loading, transport and unloading is taken into account.

2.21 The Committee's view on this matter is corroborated by practices of the Australian National Railways. The Committee was advised that new double-deck rail wagons now operating between Alice Springs and Adelaide have deck heights of 187.5cm and 182.5cm. These would give clearances of 35cm and 30cm (14 inches and 12 inches) over the withers

of a 15-hand horse. ANR does not regard this clearance as sufficient for horses and therefore carries them in single-decked wagons only.<sup>15</sup>

2.22 The Committee also has reservations about practical aspects of the guidelines operating in Queensland. Firstly, guidelines on the transport of horses by double-decked trailers refer specifically to horses of 15 hands or less. To comply with this guideline, the Committee anticipates that a considerable degree of planning would be necessary before transport. In particular, experienced stockmen with specialist skills would always be required to accurately draft horses by height.

2.23 Secondly, the Committee notes that the guidelines "provide minimum standards" and are not mandatory. The Committee can envisage situations where the pressure to transport horses in a conventional double-deck trailer with a deck clearance below 167.5cm would be strong. Similar situations could arise if horses over the average height of 15 hands are presented for transport.

*2.24 The Committee recommends that all State and Territory Governments prohibit the transport of horses in double-decked vehicles.*

#### **Use of Electric Prods During Loading and Unloading**

2.25 The movement of animals on and off vehicles is generally regarded as the most injury-prone and stressful part of the entire transport operation. The animals are usually in strange surroundings, may be unused to pens, ramps or vehicles, may be mixed with other animals with whom they have had no previous contact, may be tired from mustering or travel, and unused to the inevitable noise and confusion. There is an obvious need to treat the animals with considerable care during this phase of transport.

2.26 The Committee, therefore, was concerned to observe several instances of indiscriminate and even cruel use of electric prods on cattle during loading and unloading. The Committee observed prods being used on animals hemmed in at the rear of trucks and on animals already moving freely in the right direction. A prod was also applied between the eyes of a steer standing the wrong way in a race and having no room to turn.

2.27 Several witnesses, appearing before the Committee, raised strong concerns about the use of electric prods. For example, RSPCA Australia, in its submission, stated:

Loading and unloading of livestock presents one of the major sources of trauma since the animals themselves are frightened, bewildered and often the people handling the animals are upset, working on a short fuse with limited time. There is a natural tendency among operators to use electric goads excessively or indeed to use dogs and other goads when it is no longer appropriate. One definition of torture is the use of goading devices such as electric shocks in situations where the animals cannot escape and these sorts of practices ought to be condemned universally.<sup>16</sup>

2.28 The Society advocates the following policy on the use of electric prods:

The use of goading devices... should be restricted to the minimum necessary to complete the procedure... Electric goads should be operated only by battery or dynamo and comply with standards approved by the Standards Association of Australia.<sup>17</sup>

2.29 Elaborating on this policy at a public hearing, Dr Hugh Wirth, President of the Society, gave his personal view on this matter. He observed:

I have always been opposed to prodders because when you have a prodder in your hand you cannot help but use it. If you have stock running well you cannot resist the temptation to make them run a little bit faster... you do not need an electric prodder. You just cannot help but overuse it even though you might consciously deny it. I am opposed to cattle prodders. A good animal husband does not need it.<sup>18</sup>

2.30 Similar views to those of Dr Wirth were expressed by ANZFAS<sup>19</sup> and by the Australian Meat and Livestock Corporation. The Corporation described the use of electric prods as "totally unnecessary".<sup>20</sup>

2.31 Other evidence suggested that the use of prods should be discouraged and more strictly controlled rather than banned. For example, Dr John Barnett, Scientific Adviser to the Australian Pig Industry Policy Council, said that he "would like to see the prodders discouraged". Mr Peter Brechin, Producer Member of the same Council, informed the Committee that the NSW Farmers' Federation has a policy of discouraging the use of prodders.<sup>21</sup>

2.32 While opposing their use on horses, representatives of the Australian Veterinary Association suggested that electric prods have a legitimate use.<sup>22</sup> Dr Patricia Ellis observed:

Prodders do have a use if used properly in the loading of cattle... when the only way you can encourage an animal to turn around is to use a prodder.<sup>23</sup>

2.33 Dr Lex Carroll, a veterinary surgeon and Convenor of the Animal Welfare Committee of the Cattlemen's Union, expressed the view that "judicious use [of prods] is a necessary part of your operation".<sup>24</sup> Mr John Lapworth, of the Queensland Department of Primary Industries, was another witness who told the Committee that the prods should not be banned, although he admitted to reservations about the way in which they are sometimes used.<sup>25</sup>

2.34 Several witnesses maintained that the use of an electric prod is essential as it promotes efficient loading and unloading. It also can assist to alleviate potential problems with stock.

2.35 Mr Michael Clark, of the Australian Council of Livestock Agents, indicated that if prods are not used "you would slow down the loading" and "cause stress by being too slow". He emphasised, however, that prods have to be used properly.<sup>26</sup>

2.36 Mr Justin Toohey, Deputy Director of the Cattle Council of Australia, maintained that electric prods could enhance animal welfare. He stated:

[I have] found the prod a most effective means of handling livestock. And, as far as welfare is concerned, it is probably more effective than twisting the tail or beating the animal with a polythene pipe.<sup>27</sup>

2.37 The policy and guidelines of various government and agencies recognise the proper use of electric prods in the loading and unloading of livestock. Mr Bryan Johnston, Special Livestock Officer (Beef Management), NSW Department of Agriculture and Fisheries, in an attachment to the Department's submission stated:

Electric prodders are considered an essential aid when loading livestock, especially cattle. Controlled use and staff training would be the preferred direction. Currently, we endorse their use for loading stock and pre-knocking box in abattoirs. Often a prodder is the only effective means of encouraging a 'downer' to get up in a loaded vehicle whilst in transit.<sup>28</sup>

2.38 The Committee notes that the Model Code of Practice, promulgated by the Australian Agricultural Council, also recognises the use of electric prods.

2.39 In her comments on this matter, Dr Mary Barton, Chairman of the South Australian Government's Animal Welfare Advisory Committee, alluded to the need for education and skill. She added:

Obviously, you need to use some sort of device often to move stock, but I think that people have to know what they are trying to do and how to do it properly.<sup>29</sup>

2.40 The Committee acknowledges that there is persuasive evidence that electric prods are used indiscriminately and excessively. On the basis of this evidence, the Committee considered recommending a ban on the use of electric prods in transport activities.

2.41 The Committee, however, considers that electric prods, if used judiciously and sparingly, do not pose major animal welfare problems. In fact, prods may alleviate potentially serious problems during loading and unloading operations. The Committee, however, is of the view that the use of prods should be controlled more strictly.

*2.42 The Committee recommends that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, amend the Model of Code of Practice on the Road Transport of Livestock to include:*



- *Specific limitations on the strength of the current in electric prods;*
- *Clear instructions on appropriate use of electric prods; and*
- *Clear guidance on inappropriate use of electric prods.*

2.43 The Committee also considers that training in the proper use of electric prods should be incorporated into all training courses in stock-handling and transporting. The issue of education and training is addressed in detail in Chapter 4.

### **Duration of Journeys**

2.44 The Committee received evidence of journeys of inordinate length and duration. For example, Mr David Napier, Principal Stock Inspector, Northern Territory Department of Primary Industry and Fisheries, referred to horses travelling from Queensland and the Gulf Country via the Stuart Highway through Alice Springs to the abattoir at Peterborough in South Australia.<sup>30</sup> Horses also travel to Peterborough from Perth<sup>31</sup> and from Queensland via New South Wales.<sup>32</sup>

2.45 Dr Patricia Ellis, of the Australian Equine Veterinary Association, told the Committee of a consignment of pigs, transported about 4,000 kilometres from Darwin to Melbourne by road and then exported by ship to Malaysia, almost passing Darwin en route.<sup>33</sup> Mr Kevin Shiell, Executive Director of the Sheepmeat Council, referred to sheep being transported from Queensland to Portland, in western Victoria, for live export.

2.46 This evidence presented during the inquiry raises an important matter relating to the duration of journeys. The Model Code of Practice on the Welfare of Livestock being Transport by Road recommends:

After each 24 hours of travel, a rest period of between 12 and 24 hours should be provided for:

- all immature ruminants (under 3 months of age);
- horses (including brumbies);
- pigs (see below).

The period of travel for these animals may be extended to 36 hours if a full 24 hour rest period is provided before the next stage of the journey is commenced.

In the case of mature ruminant animals (sheep, cattle, goats and buffalo), a rest period of between 12 and 24 hours should be provided after each 36 hours of travel. The period of travel may be extended to 48 hours if a full 24-hour rest period is then provided.<sup>34</sup>

2.47 A similar recommendation appears in the Code relating to Rail Transport.

2.48 The Committee notes that other countries, particularly in Europe, have adopted much shorter times for journeys involving the road transport of livestock. For example, the Committee understands that, in the European Communities, animals should not be left more than twenty-four hours without being fed and watered.

2.49 The Committee recognises that the recommendations contained in the Model Code of Practice have been formulated to reflect local conditions. It notes further that with the closure of more than one-third of the nation's abattoirs in the fifteen years to 1989, the average length of journeys for animals destined for slaughter is increasing. The Committee also is aware that breaks in journeys may pose more problems for animal welfare than continuing to destination.

2.50 Nevertheless, the Committee is concerned that the duration of journeys by road and rail involving cattle may extend to 48 hours. This seems inordinately long. The Committee notes that its concern is shared by ANZFAS. The Federation recommends that a limit of 36 hours should be introduced.

2.51 *The Committee recommends that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, review the recommendations contained within the Model Codes of Practice relating to duration of journeys involving the transport of livestock.*

## Livestock Vehicle Accidents

2.52 The New South Wales Government drew the Committee's attention to problems arising from accidents involving vehicles carrying livestock. The Government recognises that livestock transport accidents account for a small percentage of the total number of transport-related injuries and death. Nevertheless, reports and complaints are made about the welfare of animals involved in these accidents. The Government gave details of reports on some accidents:

These include reports of animals not being destroyed until the day following the accident and injured animals being reloaded and driven some distance to the abattoir. Animals were left to suffer for unacceptable periods of time due to confusion amongst people called to the accident scene over who had the responsibility and expertise to humanely destroy animals with severe injuries. In one reported incident sheep which had broken legs or had lost entire limbs were reloaded and transported to an abattoir. Also in this incident, sheep were inexpertly destroyed by exsanguination [bleeding] without prior stunning.<sup>35</sup>

2.53 The Government has prepared a pamphlet setting out guidelines for the management of stock in these circumstances. These guidelines include information on steps to be taken when a livestock vehicle overturns and animals are injured or stray on the road. The Committee welcomes this initiative.

2.54 *The Committee recommends that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, include guidelines similar to those set out in the New South Wales Government pamphlet "Livestock Traffic Accidents" into the Model Code of Practice on the Road Transport of Livestock.*

## Standards for Transport Vehicles, Ramps and Yards

2.55 Vehicles used to carry livestock should be designed to minimise the incidence of stress and injuries from obstructions and from contact with walls. The Code sets out a number of general criteria which must be met in order to achieve this objective. The aspects covered include ease of cleaning, freedom from protrusions and sharp edges, smooth sheeting

for contact surfaces, non-slip floors and closely spaced side rails.<sup>36</sup> The requirements do not incorporate any design specifications. Maximum flexibility for the achievement of the criteria through the development of improved designs is thereby retained.

2.56 Several witnesses told the Committee that they did not regard reliance on the Code as sufficient to ensure adequate standards of animal welfare. RSPCA Australia's submission stated:

It appears that the implementation of these codes of practice has varied markedly ... RSPCA Australia would like to see agreed codes of practice reduced to a form where the major points and recommendations have to be applied to every vehicle that is registered for the transport of livestock.<sup>37</sup>

2.57 ANZFAS advocates the establishment by statute of national standards covering livestock vehicles, crates and pens.<sup>38</sup>

2.58 Representatives of the four State Governments who appeared before the Committee favoured national minimum standards for vehicle design but did not specifically address the point as to whether this should be achieved by legislation or through voluntary adoption of an agreed design.<sup>39</sup> While agreeing with the desirability of national standards, the Australian Council of Livestock Agents,<sup>40</sup> Producer Councils<sup>41</sup> and the Australian Livestock Transporters' Association,<sup>42</sup> asserted that the desired result could best be achieved by self-regulation.

2.59 The Committee takes the view that national standards for vehicle design should have the force of law for several reasons. Firstly, while major livestock transport operators and their associations may conscientiously believe in the efficacy of self-regulation, many small operators and general carriers who are only engaged in livestock transport occasionally cannot be relied upon to implement a voluntary code. Secondly, many farmers carry stock in their own general purpose trucks and compulsion may be the only means of ensuring that they conform to adequate standards. Thirdly, a precedent exists in the form of the proposed amendments to Marine Orders Part 43, which will lay down certain specific standards to apply to Roll-on/Roll-off vehicles carrying livestock across Bass Strait.<sup>43</sup> Fourthly, the legislative and administrative mechanism for enforcement already exists in the form of the Motor Vehicle Standards Act and the Australian Design Rules. The

Committee is of the view that these structures could be amended to incorporate animal welfare provisions. Finally, if the national standards are limited in their application to a relatively small number of basic features, sufficient scope would remain to encourage innovative design.

*2.60 The Committee recommends that the Australian Agricultural Council and the Australian Transport Advisory Council co-operate in the drafting of a set of national design rules appropriate for the registration of vehicles to be licensed to carry livestock. Once drawn up, the rules could be administered in parallel with Australian Design Rules.*

2.61 Many of the considerations regarding matters such as contact surfaces and non-slip flooring apply not only to vehicles but also to ramps and holding yards on farms, at railway loading points, at sale yards and at abattoirs. In addition, the slope of ramps, the layout of holding yards and the provision of watering facilities have an important bearing on animal welfare.

2.62 While there was general agreement among witnesses on the desirability of adopting the highest standards, the setting and enforcement of minimum standards do not lend themselves readily to action at the national level. Most of the agricultural/primary industry departments in the States and Territories have access to the latest designs and specifications for these facilities as well as extension services through which they may be disseminated. The Committee encourages those departments to take positive steps to carry this out.

### **Loading Densities**

2.63 The Model Code of Practice on Road Transport of Livestock sets out recommended loading densities for eight categories of livestock. The Code states that "packing of animals either too loosely or too tightly in stock crates predisposes them to injury".<sup>44</sup>

2.64 Animals packed too tightly will bruise each other and suffer from stress. Those packed too loosely will be thrown about the vehicle by changes in speed and direction. Bruising and injuries reduce the value of the carcass, the loss being ultimately borne by the producer.

2.65 The optimum loading density minimises bruising losses from all causes and maximises animal welfare. The densities set out in Appendix

1 of the Code, expressed in terms of square metres per animal and animals per deck, are an attempt to arrive at this optimum.

2.66 The Committee is aware that Mr Graeme Eldridge, Livestock Research Officer with the Victorian Department of Agriculture and Rural Affairs, has conducted experiments with the aim of providing objective data in this area. His research indicates that the densities specified in the Code are about 10 per cent higher than the optimum. Accordingly, Dr Elderidge maintains that, if the current densities were reduced by this amount, the level of injuries would be also be reduced. However, if a further reduction, below the optimum, is made, the injury rate increases again.<sup>45</sup>

2.67 In another study provided to the Committee, Mr Eldridge demonstrates that there are economic benefits to be gained from optimum loading densities. According to Mr Eldridge, loading at the optimum density reduces the injury rate and therefore generates additional revenue. This additional revenue may exceed any savings that may be gained from lower freight charges associated with loading at the higher densities recommended in the Code.<sup>46</sup> Most importantly from an animal welfare perspective, the lower loading density enhances the well-being and comfort of the animals during transport.

2.68 The Committee welcomes the research work of Mr Eldridge and notes that during the inquiry his work received favourable comment from RSPCA, Australia,<sup>47</sup> and the Cattle, Sheepmeat and Wool Councils.<sup>48</sup>

2.69 In commenting on the densities recommended in the Code, Dr Barnard, of the NFF, observed:

The loading densities used in practice tend to be a little lower than the Code. That indicates that out there on the ground, people think that the Code may be a little bit high.<sup>49</sup>

2.70 This view is supported by Mr Lapworth, of the Beef Husbandry Branch of the Queensland Department of Primary Industries. In an article in the Queensland Agricultural Journal, Mr Lapworth wrote that "the densities in the Code are much higher than would normally be carried in a multideck stockcrate".<sup>50</sup> The Committee also notes that the maximum densities recommended in the code drawn up by the Australian Livestock

Transporters' Association are generally 10-20 per cent lower than in the Model Code.<sup>51</sup>

*2.71 The Committee is attracted to the concept of optimum loading density and recommends that research into this and other aspects of the conditions associated with the transport of livestock should be extended.*

*2.72 The Committee further recommends that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, review the loading densities recommended in the Model Code of Practice on Road Transport of Livestock. Upon completion of this review, densities should be set out in the Code with stated margins for flexibility and applied nationally.*

## ENDNOTES

1. *Evidence*, New South Wales Department of Agriculture and Fisheries, p. 548.
2. *Submission*, New South Wales Government, pp. 2-3.
3. *Evidence*, South Australian Government, p. 625.
4. *Evidence*, RSPCA Australia, p. 97.
5. *Evidence*, Australian and New Zealand Federation of Animal Societies, p. 171.
6. *Evidence*, Australian Council of Livestock Agents, p. 277.
7. *Evidence*, Cattlemen's Union, p. 710.
8. *Evidence*, Northern Territory Government, p. 12; pp. 25-26.
9. *Evidence*, Australian Equine Veterinary Association, p. 39.
10. *Evidence*, Metro Meat Limited, p. 685.
11. *Evidence*, Queensland Department of Primary Industries, pp. 793-799.
12. *ibid.*, p. 799.
13. *Submission*, New South Wales Government, p. 2.
14. *Evidence*, Queensland Department of Primary Industries, p. 784.
15. *Evidence*, Australian National Railways Commission, p. 645; p. 649; p. 657; p. 662.
16. *Evidence*, RSPCA Australia, p. 71.
17. *ibid.*, p. 123.
18. *ibid.*, p. 164.
19. *Evidence*, Australian and New Zealand Federation of Animal Societies, pp. 242-243.



20. *Evidence*, Australian Meat and Livestock Corporation, p. 587.
21. *Evidence*, Australian Pig Industry Policy Council, p. 527.
22. *Evidence*, Australian Equine Veterinary Association, p. 51.
23. *ibid.*
24. *Evidence*, Cattlemen's Union, p. 721.
25. *Evidence*, Queensland Department of Primary Industries, pp. 811-813.
26. *Evidence*, Australian Council of Livestock Agents, p. 278.
27. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 492.
28. *Evidence*, New South Wales Department of Agriculture and Fisheries, p. 550.
29. *Evidence*, South Australian Government, pp. 629-630.
30. *Evidence*, Northern Territory Government, p. 12.
31. *Evidence*, Metro Meat Limited, pp. 679; p. 687.
32. *ibid.*, pp. 683-684.
33. *Evidence*, Australian Equine Veterinary Association, p. 55.
34. Australian Agricultural Council, *Model Code of Practice for the Welfare of Animals - Road Transport of Livestock*, Canberra, 1983, p. 9.
35. *Submission*, New South Wales Government, p. 4.
36. Australian Agricultural Council, *op. cit.*, p. 5.
37. *Evidence*, RSPCA Australia, p. 68.
38. *Evidence*, Australian and New Zealand Federation of Animal Societies, p. 170.
39. *Evidence*, New South Wales Department of Agriculture and Fisheries, p. 556.

- Evidence*, Victorian Department of Agricultural and Rural Affairs, p. 321.
- Evidence*, Queensland Department of Transport, p. 748.
- Evidence*, Queensland Department of Primary Industries, p. 814.
- Evidence*, South Australian Government, p. 628.
40. *Evidence*, Australian Council of Livestock Agents, p. 259.
  41. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 446; p. 474.
  42. *Evidence*, Australian Livestock Transporters' Association, p. 889.
  43. *Evidence*, Department of Transport and Communications, p. 419.
  44. Australian Agricultural Council, *op. cit.*, p. 10.
  45. *Evidence*, Victorian Department of Agriculture and Rural Affairs, pp. 291-301.
  46. *Beef Improvement News*, Livestock Publications Pty Ltd, Ascot Vale, Victoria, August 1990, pp. 14-15.
  47. *Evidence*, RSPCA Australia, p. 72.
  48. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 482.
  49. *ibid.*, p. 479.
  50. *Evidence*, Queensland Department of Primary Industries, p. 783.
  51. *Evidence*, Australian Livestock Transporters' Association, Canberra, p. 923.  
Australian Livestock Transporters' Association, *Code of Practice for the Road Transport of Livestock*, Canberra, 1990, p. 14.

## CHAPTER 3

### ROAD TRANSPORT - VOLUME LOADING OF LIVESTOCK

#### Introduction

3.1 Of all the issues raised during the inquiry, volume loading of livestock received the most comment, particularly from producer and transport organisations. In this chapter, the Committee reviews the concept of volume loading, its application in Queensland and recent reports and evidence on the matter. The Committee also addresses calls for its introduction throughout Australia.

3.2 The Committee recognises that volume loading involves complex and technical considerations including road safety, wear and tear on roads, transport costs as well as the welfare of animals. The focus of the Committee is necessarily on the animal welfare aspects of volume loading.

#### Background

3.3 As indicated in the previous chapter, the Model Code of Practice for the Welfare of Livestock being transported by Road makes recommendations on loading densities. The following extract from the Code illustrates the guidance given to drivers:

Table 3.1: Recommended Loading Density During Road Transport: Cattle

Average Weight (kg)	Floor Area (m <sup>2</sup> /head)	Number of Head Per 12.2m (40ft) Deck
450	0.99	30
500	1.06	28
550	1.14	26

*Source:* Model Code of Practice for the Welfare of Animals - Road Transport of Livestock, p. 10.

3.4 The Code recognises that the packing of animals either too loosely or too tightly in livestock vehicles predisposes them to injury. It also

recognises that the driver is responsible for ensuring that the loading density and penning arrangements are compatible with the welfare of the animals and the capacity of the vehicle.

3.5 State and Territory Governments have regulations governing the specifications of road vehicles. The principal regulations affecting livestock vehicles are those that limit their dimensions. Regulations control maximum length, width, height, the maximum weight load on individual axles, or groups of axles, and the gross or total vehicle weight. The gross vehicle weight is made up of the tare, or unladen, weight of the vehicle, and the weight of the payload.<sup>1</sup>

3.6 Presently, all States have a legal limit on the gross vehicle weight of articulated vehicles. The weight of a semi-trailer combined with the weight of its payload cannot exceed 42.5 tonnes. This limit applies throughout Australia with the single exception of vehicles carrying livestock in Queensland. This weight limit is enforced by regular checks at weighbridges and by random checks using portable equipment.<sup>2</sup>

3.7 The legal limit of 42.5 tonnes for vehicles presents few problems for single-decked semi-trailers carrying livestock, as the total weight of a fully loaded single-decked semi-trailer and prime mover falls well within the 42.5 tonne limit.

3.8 Since the development of double-decked livestock crates in the late 1970s, however, several problems have developed. Firstly, in order to ensure that the total weight of vehicles remains within the legal limit, drivers and handlers have to estimate, at the point of loading, the weight of the stock being carried. Often, drivers and others involved in handling do not have the appropriate skills and experience to do this successfully.<sup>3</sup>

3.9 Secondly, if double-decked vehicles are loaded in accordance with the densities recommended in the Code, in most cases, their total weight will exceed the legal limit. For example, as indicated in paragraph 3.3, the Model Code advises that 28 cattle, each weighing 500 kilograms, may be loaded on each deck of a semi-trailer. The total weight of this payload is 28 tonnes. Even if this payload were hauled by a light-weight prime mover and semi-trailer with a tare weight of about 17 tonnes,<sup>4</sup> the total weight would be at least 45 tonnes, or 2.5 tonnes over the legal limit. This problem is exacerbated if heavier vehicles are used.

3.10 Therefore, a vehicle loaded in accordance with the Code may be well over the legal weight limit of 42.5 tonnes. This could result in heavy fines for overloading. It also encourages drivers to travel by circuitous routes in an attempt to avoid checkpoints.

3.11 On the other hand, a vehicle loaded within the weight limits would have a loading density lower than that specified in the Code. This situation may result in unstable loads and subject livestock to excessive bruising.

### **Volume Loading in Queensland**

3.12 Following representations from the livestock and transport industries, the Queensland Government, in 1983, amended regulations under its Main Roads Act to exempt vehicles carrying livestock from all weight limits, provided that they met certain safety requirements. The regulations also reduced the length of livestock vehicles from 12.5 metres to 12.2 metres.<sup>5</sup> The changes were made without specific reference to animal welfare considerations.<sup>6</sup> In Queensland, consignors and drivers can load livestock without fear of exceeding weight limits and in accordance with loading densities recommended in the Model Code. However, without any legal limits on total weight, handlers can be tempted to overload in order to reduce unit transport costs.

3.13 Although densities in the Code are expressed in terms of area per animal, or total number of animals per deck with a stipulated area, rather than volume, the new system in Queensland acquired the misnomer of "volume loading".

3.14 According to Mr Alan Meares, Director of the Road Transport and Traffic Division of the Queensland Department of Transport, the system of volume loading in Queensland is well accepted. This is because it encourages greater productivity by increasing payloads, reduces bruising and other injuries and eliminates weight checks.<sup>7</sup>

3.15 The Committee understands that these positive benefits have not been achieved without some offsetting costs. Trailers and crates have become heavier in order to transport heavier loads. Vehicles and loads weighing between 50 and 55 tonnes in total are now common.<sup>8</sup>

3.16 Because of the popularity of volume loading in Queensland, producer and transport associations have recommended that the system be introduced nationally.

3.17 Other States and the Northern Territory have opposed extension of the Queensland system on three grounds. Firstly, excessive axle loads would lead to accelerated deterioration of roads and bridges. Secondly, higher total weights would affect road safety adversely. Thirdly, removal of legal weight limits would remove any incentive to reduce the tare weights of vehicles.<sup>9</sup>

### **Inter-State Commission Report**

3.18 In 1987, following a request from the Commonwealth Minister for Primary Industries and Energy, the Inter-State Commission prepared a report on the costs and benefits of the volume loading of livestock as part of its broader examination of the efficiency of interstate transport arrangements.<sup>10</sup>

3.19 In 1989, the Commission, in its report entitled *Volume Loading of Livestock for Transport by Road*, published its findings on volume loading.<sup>11</sup> The Commission favoured the uniform introduction of volume loading throughout Australia, subject to certain conditions, including the following:<sup>12</sup>

- maximum tare weight of 10.0 tonnes for semi-trailers;
- maximum tare weight of 13.0 tonnes for dog trailers (as used in road trains);
- maximum trailer length of 12.5m;
- provision of four pens per deck; and
- speed to be governed to 95 kilometres per hour.

3.20 In its report, the Commission also commented on the implications of volume loading for animal welfare. The report stated:

The Commission accepts the evidence that there is a range of densities, depending on animal size, within which bruising damage is minimised. But the Commission considers that the losses arising from bruising provide insufficient incentive to ensure that animals are loaded to these densities and it is

unconvinced that complying with the densities guarantees that most animal welfare concerns are met.<sup>13</sup>

### **Volume Loading and Animal Welfare**

3.21 Nearly all witnesses who appeared before the Committee recognised that appropriate loading of vehicles enhances the welfare of animals being transported. Indeed, Dr Hugh Wirth, President of RSPCA Australia, suggested to the Committee that the term volume loading should be replaced by "welfare loading".<sup>14</sup> Other witnesses referred to this approach as "optimum density loading". For example, in its submission to the Committee, ANZFAS recognised that appropriate loading densities should reflect the number of animals of a species that can be accommodated comfortably and safely.<sup>15</sup> Several witnesses recognised that the key features of optimum density loading are minimum levels of stress, injury and bruising.

3.22 Producer and transport organisations emphasised the economic benefits associated with volume loading. They maintained that unit transport costs under volume loading are lower than those applying to vehicles conforming to weight limits.<sup>16</sup> Other benefits drawn to the Committee's attention included increased safety, attributable to more stable loads, and the elimination of delays at weighbridges.<sup>17</sup> However, Mr John Lapworth, an officer of the Queensland Department of Primary Industries, cautioned that there are associated costs involved with volume loading including cost increases arising from greater wear on tyres, suspensions and bearings.<sup>18</sup>

3.23 Producer Councils and the Cattlemen's Union recommended that the Queensland system of volume loading, under which there are no limits on either the tare weight of vehicles or the weight of the load, should be introduced nationally.<sup>19</sup>

3.24 The Committee is aware that other State and Territory Governments are concerned about the impact of higher total vehicle weights on road surfaces and bridges. The Commonwealth Department of Transport and Communications and the Queensland and South Australian Departments of Transport emphasised the need to recoup costs associated with added wear and tear.<sup>20</sup> The State departments were also concerned that any concession on weight limits to the livestock transport industry

could discriminate against other transporters operating within the 42.5 tonne limit.<sup>21</sup>

3.25 Although focussing on animal welfare matters, the Committee questioned Mr Richard Leeson, Chairman of the Task Group on Volume Loading of Livestock, on whether these competing interests could be reconciled. He observed:

The task group is confident that it can provide industry and the State road authorities with a scheme that can offer industry a volume loading option with a cost recovery schedule to satisfy the State road authorities and placate other sections of the transport industry.<sup>22</sup>

### **Committee's View - Optimum Density Loading**

3.26 The Committee endorses the view that there is an optimum loading density and that departure, in either direction, from this optimum will adversely affect animal welfare.

3.27 In the previous chapter, the Committee recognised that current recommendations on loading densities contained in the Code may be too high and recommended their review. It considers that, once determined and published, these densities should be adhered to in order to maximise the welfare of the animals. The Committee considers this to be the paramount consideration and strongly supports the loading of all livestock vehicles, irrespective of size, at optimum density.

3.28 The Committee is also of the view that routine and random weighing checks of livestock vehicles is contrary to the welfare of the animals. It therefore supports the exemption of livestock vehicles from these checks.

3.29 However, the Committee is conscious of the fact that these two desirable goals, optimum density loading and exemption from weight checks, cannot be implemented nationally until agreement is reached on a series of transport regulation issues, namely:

- whether there should be any express or implied limit on total loaded vehicle weights;



- whether, in order to place some ceiling on total vehicle weights, limits should be placed on the tare weights of vehicles;
- whether additional charges should be levied on vehicles whose estimated average total weight exceeds the legal limit for other vehicles of 42.5 tonnes.

3.30 In Queensland, there are no limits on total or tare weights and no surcharges for the additional total weight of livestock vehicles. This is the system advocated for national implementation by producer and transport groups. As noted above, several States are opposed to the Queensland system.

3.31 The Committee rejects the notion that the abandonment of weight limits is a necessary condition to the introduction of optimum density loading. The issues of loading density and vehicle weight are distinct and can be pursued independently.

3.32 In the Committee's view, optimum density loading is feasible within the current, or indeed any specified, total weight limit. As pointed out earlier in this chapter, the area available for loading could be reduced to meet the 42.5 tonne limit. This would be facilitated by the simultaneous imposition of a limit on the tare weight of livestock vehicles.

3.33 According to the Inter-State Commission this option is favoured by both Victoria and Western Australia.<sup>23</sup> It was also one of the possible solutions put forward by the Commission itself.<sup>24</sup>

3.34 The option was acknowledged by Mr Leeson, Chairman of the Task Group on Volume Loading of Livestock, when questioned on whether the volume loading issue could be settled simply by reducing the size of the livestock vehicle in order to reduce weight and retain optimum density loading. Mr Leeson responded:

That is an option, but another option is not to fill all the pens in the crate. I see no reason why some sort of temporary gates cannot be put into the crate.<sup>25</sup>

3.35 While not in a position to pass judgement on the matter, the Committee believes that, on the assumption that the densities set out in this Code may be 10-15 per cent too high, a semi-trailer with a length of

10 metres (against the current maximum of 12.5 metres) would have a tare weight close to 10 tonnes and could carry an optimum load of around 22 tonnes. Together with a prime mover weighing around 10 tonnes, such a vehicle would have a total weight of around 42 tonnes.

3.36 Given appropriate limits to length and tare weight, the Committee considers that there should be no obstacle to granting exemption from weight checks for livestock vehicles, without departing from the current weight limits.

3.37 *The Committee recommends that the Minister for Primary Industries and Energy and the Minister for Transport and Communications, through appropriate inter-governmental bodies:*

- (i) seek uniform road transport regulations which would permit vehicles carrying livestock to be loaded to optimum density and exempt such vehicles from regular and random weight checks.*
- (ii) propose that, if all governments cannot agree to the removal of weight limits for semi-trailers of standard length when carrying livestock, regulations specifying such maximum length and tare weight be introduced as would result in average or typical laden weights falling within the current weight limits.*

#### **Associated Issues**

3.38 Although there was general support for concept of volume loading, several witnesses expressed concern about its introduction throughout Australia as recommended. Two of these concerns have implications for animal welfare and are considered in the following section of the report. They relate to the provision of pens and overloading.

#### **Provision of Pens**

3.39 The Inter-State Commission's recommendation on the introduction of volume loading throughout Australia is subject to several conditions including the provision of four pens on each deck of a livestock vehicle. This would reduce the payload by about four tonnes.<sup>26</sup>

3.40 Several witnesses opposed this condition. Indeed, the Committee was advised that many crates used in Australia are not equipped with

pens at all. Specifically, the Producer Councils, the Cattlemen's Union and the Australian Livestock Transporters' Association opposed the compulsory provision of pens. These organisations regard pens as an impediment to loading and unloading, a potential obstacle to animals unused to handling and unnecessary on the majority of journeys in northern Australia, where roads are flatter and straighter than in the southern States.<sup>27</sup> The installation of pens may also result in an increase in the angle of internal ramps used to load and unload the upper decks.

3.41 Other evidence presented to the Committee supported the installation of pens on animal welfare grounds. For example, in its submission to the Committee, the Victorian Government stated that the division of decks into pens enhances the safety of animals during transport.<sup>28</sup> This view recognises that, in their absence an abrupt change of speed or direction will cause the entire deck-load to bunch into a single pack, risking serious injury to those at the end of the crush. The risk of injury increases with the distance over which the animals are moved. These views were shared by ANZFAS.

3.42 As recognised by the Inter-State Commission, the installation of pens curbs overloading. Correct loading densities are easier to achieve in smaller areas and a comfortable and safe fit is readily apparent.

3.43 In the Committee's view the division of decks into pens has an important bearing on animal welfare during loading and transport. Firstly, pens encourage loading to optimum density and inhibit overloading. Secondly, the presence of internal barriers reduces the effect of changes in speed and direction associated with transport. This view is supported by Mr Graeme Eldridge, whose research indicates that there is a significant reduction in bruising when animals are penned during transport. Pens reduce excessive movement and, therefore, injuries to animals during transport.

3.44 Accordingly, the Committee supports the recommendation of the Inter-State Commission that the provision of pens be mandatory under a system of volume loading.

## Overloading

3.45 The Committee accepts that producers and transporters are now more aware of the importance of delivering animals free from bruising. Marketing arrangements, such as direct selling, provide detailed information on the condition of each carcass and this enables the producer to monitor the transport process.

3.46 Nevertheless, an inherent problem with volume loading may be to encourage an attitude of "putting a few more animals on" with the knowledge that this will go undetected. Although this problem was recognised by several witnesses, none were able to offer satisfactory solutions, other than, to highlight the effect of sanctions imposed by the market-place.

3.47 In the Committee's view, however, market forces alone cannot yet be relied upon to safeguard the welfare of animals during transport. The Committee considers that more direct sanctions are required to ensure that volume loading, or optimum density loading as it prefers to call it, should not be an open invitation to overload.

3.48 The Committee considers that a national approach to volume loading should not be adopted until stricter regulatory arrangements safeguarding the welfare of animals being transported are put in place. The Committee has addressed ways to achieve this objective in Chapter 1 of this report.

## ENDNOTES

1. Inter-State Commission, *The Efficiency of Interstate Transport Arrangements: Second Report - Harmonisation of Road Vehicle Regulation in Australia: Volume 1*, AGPS, Canberra, June 1988, pp. 9-16.
2. *Evidence*, Queensland Department of Transport, p. 740.
3. *ibid.*, p. 741.
4. Inter-State Commission, *The Efficiency of Interstate Transport Arrangements - Third Report: Volume Loading of Livestock for Transport by Road*, AGPS, Canberra, November 1989, p. 45.
5. *Evidence*, Queensland Department of Transport, p. 740.
6. *ibid.*
7. *ibid.*, p. 741.
8. *ibid.*
9. Inter-State Commission, *Volume Loading of Livestock for Transport by Road*, p. 10.
10. *ibid.*, p. 5.
11. Inter-State Commission, *Volume Loading of Livestock for Transport by Road*
12. *ibid.*, p. 57-58.
13. *ibid.*, p. 31.
14. *Evidence*, RSPCA Australia, p. 152.
15. *Evidence*, Australian and New Zealand Federation of Animal Societies, p. 177.
16. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 455.  
*Evidence*, Cattlemen's Union, p. 702.  
*Evidence*, Australian Livestock Transporters' Association, p. 910.

17. *Evidence*, Cattle, Sheepmeat and Wool Councils, pp. 455-6.
18. *Evidence*, Queensland Department of Primary Industry, p. 801.
19. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 447.  
*Evidence*, Cattlemen's Union, pp. 455-6.
20. *Evidence*, Department of Transport and Communications, pp. 427-9.  
*Evidence*, South Australian Government, p. 608.  
*Evidence*, Queensland Department of Transport, pp. 741-2.
21. *Evidence*, South Australian Government, p. 609.  
*Evidence*, Queensland Department of Transport, p. 742.
22. *Evidence*, Queensland Department of Transport, p. 762.
23. Inter-State Commission, *Volume Loading of Livestock for Transport by Road*, pp. 18-19.
24. *ibid.*, p. 28.
25. *Evidence*, Queensland Department of Transport, pp. 768-9.
26. Inter-State Commission, *Volume Loading of Livestock for Transport by Road*, p. 36.
27. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 56.  
*Evidence*, Cattlemen's Union, p. 704; p. 713.  
*Evidence*, Australian Livestock Transporters' Association, p. 916.
28. *Evidence*, Victorian Department of Agriculture and Rural Affairs, pp. 310-311; pp. 316-319.

## CHAPTER 4

### ROAD TRANSPORT - TRAINING, LICENSING AND ACCREDITATION

#### Introduction

4.1 During the inquiry, the Committee formed the view that many of the problems associated with the welfare of livestock being transported would not arise if transporters have appropriate knowledge, skills, training and experience in handling stock.

4.2 This view was supported by several witnesses appearing at public hearings who stressed that the welfare of livestock was dependent more on the knowledge, experience and attitude of handlers than on the enforcement of rules and regulations.

4.3 It was suggested to the Committee that many people "raised in the bush" have acquired an appropriate level of knowledge and experience to transport livestock with due regard to welfare. It was also recognised, however, that this may also involve the passing on of bad practices.

4.4 There was general agreement that the welfare of livestock being transported will be improved if they are handled by knowledgeable and skilled personnel.

#### The Need for Education and Training

4.5 The Committee understands that in Australia a driver of a livestock vehicle is not required to have any relevant training or experience in the handling of stock.

4.6 It is not surprising therefore that the need for education and training programs with the concomitant benefits to animal welfare was recognised by several witnesses. For example, Dr John Plant, President-elect of the Australian Veterinary Association, informed the Committee that there is "a need for an education campaign throughout the [transport] industry".<sup>1</sup>

4.7 Animal welfare groups also identified training as an important element in protecting the welfare of livestock. RSPCA Australia<sup>2</sup> and ANZFAS<sup>3</sup> recommend training courses in animal husbandry for road transport operators.

## Training Programs and Licensing

4.8 Training programs for personnel involved in the transport of livestock are conducted by government and industry bodies.

4.9 Mr Graeme Eldridge, a specialist in animal behaviour with the Victorian Department of Agriculture and Rural Affairs, gave the Committee details of a training program he had conducted recently in Victoria at the request of the Livestock Transporters' Association of Victoria. The course was the first of its kind and was directed at experienced drivers. Practical aspects of the course included the drafting of stock according to size, moving them in groups, handling during loading and unloading and the estimation of weight and loading densities. Driving was not covered.

4.10 Other matters covered included general familiarity with the Road Transport Code of Practice and the Prevention of Cruelty to Animals Act, accident and emergency procedures, factors causing stress, stock diseases, in-transit inspection and documentation for interstate consignments. At the conclusion of the course, the participants were given a certificate of completion and a photographic identity card.<sup>4</sup> Mr Eldridge told the Committee that he favours a "fairly uniform training of stock people throughout the [transport] industry".<sup>5</sup>

4.11 The Committee commends Mr Eldridge for his work in this area.

4.12 The Committee understands that the New South Wales Government, through its Department of Agriculture and Fisheries and in conjunction with the NSW Livestock Transporters' Association, is also developing a course in stock handling and driving techniques at the Driver Education Centre at Shepparton, Victoria.

4.13 Producer and transport industry organisations are promoting education and training. For example, representatives of the Australian Pig Industry Policy Council stated that their industry is "the first rural commodity to work on an integrated training package which covers all aspects of the industry, and which will encompass animal welfare considerations arising within the transportation chain".<sup>6</sup>

4.14 Representatives of the Australian Livestock Transporters' Association advised the Committee that in the past livestock transporters



have relied on strong informal networks within the rural community to ensure that animal welfare standards are observed and improved.<sup>7</sup>

4.15 Increasingly, livestock transporters have formalised these arrangements and have placed emphasis on improving the training of its members.<sup>8</sup> Now, the Association actively promotes courses in training which recognise the special skills of livestock transport.<sup>9</sup>

4.16 Mr Robert Gunning, Executive Director of the Association, explained the reasons behind the promotion of training by the Association:

Increasingly, and particularly over the last decade, there has been a great focus on livestock transport delivering animals to wherever they are going in an unstressed and unbruised condition.<sup>10</sup>

4.17 Mr Gunning also recognised that there is a greater awareness of animal welfare concerns. He explained:

People are constantly expecting higher standards and our expectation as an Association is that our community is going to get more concerned about animal welfare.<sup>11</sup>

4.18 In response to these developments, ALTA has promoted courses in Victoria and New South Wales. It has also been involved in a major course at the College of Technical and Further Education, Warwick, Queensland. The Association indicated its preference for flexible short courses that are capable of being run in rural areas.<sup>12</sup>

4.19 The Committee welcomes these and other training programs for transporters of livestock conducted by government and industry.

4.20 The Committee notes the success of the training program initiated by the Livestock Transporters' Association of Victoria. *The Committee recommends that Commonwealth, State and Territory Governments, rural and producer organisations and transport industry associations promote training programs to extend the knowledge and skills of those who handle livestock during transport. In addition to special driving techniques, these programs should include training in all aspects of the Model Code of Practice on the Road Transport of Livestock.*

4.21 The Committee also considers that consignors of stock should have a reasonable expectation that commercial carriers presenting themselves to transport livestock are competent and skilled to undertake the task. The Committee, therefore, is of the view that all commercial drivers should be properly trained in stock-handling and that this should be a requirement of and endorsed on, the driving licence of a livestock transporter.

*4.22 The Committee recommends that all drivers of vehicles carrying livestock as part of a commercial transport enterprise should be properly trained and possess a suitably endorsed vehicle driving licence. This will ensure that those offering services in the livestock transport industry have undertaken an accepted form of training or have demonstrated a specified level of competence in livestock handling.*

### **Accreditation**

4.23 The Australian Livestock Transporters' Association also advised the Committee that the Road Transport Industry Forum, of which it is a member, is committed to the introduction of a system of accreditation of drivers and vehicles within the industry. Accreditation would involve industry training, vehicle maintenance and fitness and health programs, specifically attuned to each industry sector.<sup>13</sup>

4.24 Mr Robert Gunning explained the impact of the accreditation scheme on the livestock transporting industry. He stated:

ALTA envisages that accreditation would involve a commitment to maintain an improved animal welfare standard through training, vehicle construction and vehicle maintenance.<sup>14</sup>

4.25 The Committee questioned representatives of the Australian Livestock Transporters' Association on various aspects of the accreditation scheme.

4.26 The Committee was told that the accreditation scheme is based on self-regulation and not government regulation. Mr Andrew Higginson, Forum Co-ordinator, Road Transport Industry Forum, explained:

The difference between a regulatory regime and a self-regulation regime, the way we see it, is that instead of having government decide what the standards are, industry peers will be determining what the minimum standards are.<sup>15</sup>

4.27 When questioned on the nature of this self-regulation, Mr Higginson replied:

Yes, in a sense, it is self-regulation but it is a compulsory self-regulation that the industry is proposing.<sup>16</sup>

4.28 The representatives of ALTA also commended on the extent of the accreditation system and in particular, on whether the accreditation scheme would apply to local farmers and their vehicles as well as mainstream transporters. Mr Higginson summarised the evidence on this matter when he stated:

On the general principle of accreditation we say there should be no exceptions. If people are operating vehicles out on the road, we want them to apply the minimum standards that are applied to every operator because they are at no less risk than anyone else.<sup>17</sup>

4.29 The Committee was also interested in the nature of the sanctions that would be part of the accreditation scheme. Mr Higginson and Mr Gunning stressed that the accreditation system must have "teeth".<sup>18</sup> Mr Gunning commented:

Ultimately, if people insisted on saying that they did not accept industry rules, we would be able to say to the Government that we have gone through a due process and we now believed that these people had consistently failed to observe those standards and that in essence, those people no longer had a place in the industry.<sup>19</sup>

4.30 Accordingly, the "ultimate sanction" would be the removal of a transporter's right to register a vehicle. Mr Higginson explained:

The commercial nature of the road transport industry demands we have some sort of power at the end to get rid

of someone in our industry we do not want in the industry.<sup>20</sup>

4.31 When questioned on these sanctions, Mr Gunning agreed that accreditation could be "endorsed" through the system of vehicle registration. He elaborated:

Essentially, it would be something we would see as being keyed into the vehicle registration, which is a fairly easy thing to do. When the system is fully running, we would see it as being necessary to have this self-regulatory accreditation to ensure that you continued to register your vehicles. That would be the key as we see it.<sup>21</sup>

4.32 Representatives of the Association, emphasised that accreditation would enhance the welfare of livestock. The following comment was made to the Committee:

When we tell people they are not observing the right kinds of behaviour - and this would strictly be about animal welfare and safety and not economic regulations - there would be some sense in which we are able to say that, with some degree of authority, as an Association.<sup>22</sup>

4.33 Several organisations that appeared before the Committee, including the Cattle Council of Australia<sup>23</sup> and the Australian Meat and Livestock Corporation,<sup>24</sup> supported the concept of self-accreditation and self-regulation.

4.34 In relation to the specific accreditation scheme proposed by the Road Transport Industry Forum, Mrs Wade, Executive Director of the Cattlemen's Union, welcomed the development of this proposal:

I think we would applaud that because it is designed to enable the industry to self-regulate and form its own training and acceptable standards. ... We think it is appropriate that the transport industry should develop parameters within which livestock operators can operate.<sup>25</sup>

4.35 Mrs Wade indicated that the transport of livestock is a three tier process, involving the producer, the transporter and the processor. She

cautioned that accreditation schemes for transporters may put "undue pressure on one area" of this process.<sup>26</sup>

4.36 Officers of several State Governments commented generally on an accreditation scheme and the possible licensing of livestock transporters. For example, the New South Wales Department of Agriculture and Fisheries advised the Committee that the Department is considering an accreditation scheme, but has yet to decide whether licence endorsement should be compulsory.<sup>27</sup> The South Australian Government's Animal Welfare Advisory Committee informed the Committee that the State Government had not determined its policy on licence endorsement<sup>28</sup> but the road transport industry was actively promoting a self-regulating system of accreditation.<sup>29</sup>

4.37 In his evidence to the Committee, Mr Alan Meares, of the Queensland Department of Transport, favoured training, testing and accreditation implemented by industry but with government providing support and the "ultimate sanction".<sup>30</sup> He explained:

We would be more than happy to see industry accreditation schemes come in. We would be more than happy to assist industry in developing those accreditation schemes ... but [the transport industry] can do any number of things up to a point. It cannot cancel vehicle registration. It cannot take a persons' drivers licence from him. So I think that the ultimate will be, that [the transport industry] will ask governments to be the ultimate sanction.

4.38 The Committee welcomes the initiatives of the Australian Livestock Transporters' Association to promote self-regulation within the industry. In particular, the Committee considers that the Association should extend its commitment to training of drivers in the proper care and handling of stock.

4.39 The Committee notes that the accreditation scheme, proposed by the ALTA, involves several stages and these will be developed by the Road Transport Industry Forum over the next few years. The proposal for accreditation will be considered by the Trade Practices Commission for authorisation under the *Trade Practices Act* 1974. The Committee understands that the Commission will examine details of the scheme including public benefit and justification. The Committee welcomes

programs that will improve the welfare of animals by raising industry standards and encouraging a more professional approach within the industry.

## ENDNOTES

1. *Evidence*, Australian Equine Veterinary Association, p. 49.
2. *Evidence*, RSPCA Australia, p. 70.
3. *Evidence*, Australian and New Zealand Federation of Animal Societies, pp. 178-179.
4. *Evidence*, Victorian Department of Agriculture and Rural Affairs, pp. 321-327.  
*Evidence*, RSPCA Australia, p. 149.
5. *Evidence*, Victorian Department of Agriculture and Rural Affairs, p. 321.
6. *Evidence*, Australian Pig Industry Policy Council, p. 503.
7. *Evidence*, Australian Livestock Transporters' Association, p. 901.
8. *ibid.*
9. *ibid.*, p. 889.
10. *ibid.*, p. 909.
11. *ibid.*, p. 919.
12. *ibid.*, p. 902.
13. *ibid.*, p. 889.
14. *ibid.*, p. 902.
15. *ibid.*, p. 918.
16. *ibid.*, p. 917.
17. *ibid.*, p. 926.
18. *ibid.*, p. 918.
19. *ibid.*, p. 913.
20. *ibid.*

21. *ibid.*, p. 921.
22. *ibid.*
23. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 474; p. 480.
24. *Evidence*, Australian Meat and Livestock Corporation, p. 585.
25. *Evidence*, Cattlemen's Union, pp. 711-712.
26. *ibid.*, p. 718.
27. *Evidence*, New South Wales Department of Agriculture and Fisheries, p. 555; p. 562.
28. *Evidence*, South Australian Government, p. 622.
29. *ibid.*, p. 636.
30. *Evidence*, Queensland Department of Transport, pp. 748-9.



## CHAPTER 5

### RAIL TRANSPORT

#### Model Code of Practice

5.1 In 1983, the Australian Agricultural Council adopted and published a Model Code of Practice for the transport of animals by rail. In most respects, the Code is similar to the road transport code.

5.2 The Code *inter alia* addresses rest stops and the duration of train journeys on which livestock are carried. It advises that rest stops extend the total time of the journey and subject animals to unfamiliar surroundings. Therefore, unloading and loading of animals for rest stops may impose more stress than that from continuing the journey for a limited period of time.

5.3 The Code states that after each 24 hours of travel, a rest period of between 12 and 24 hours should be provided for horses and all immature ruminants being transported by rail. The period of travel may be extended to 36 hours if a full 24 hour rest period is then provided. In the case of mature sheep, cattle and buffalo, the period of travel may be extended to 48 hours if a full 24 hour rest period is then provided.

5.4 A special provision contained within the Code refers to the owner of livestock or agent providing a train drover to care for consignments of stock for all journeys in excess of 12 hours. According to the Code, train drovers should have authority to delay trains in order to attend to the livestock. In the absence of a drover, railway authorities should inspect livestock during transport.<sup>1</sup>

5.5 Like the Road Transport Code, the Model Code on Transport of Livestock by Rail is being revised. The Committee welcomes this review.

5.6 There is no legislation at either Commonwealth or State level governing the transport of livestock by rail. As far as the Committee could ascertain, the only rail services still transporting livestock are the Queensland system and the Alice Springs to Adelaide service conducted by Australian National Railways (ANR).

## General Decline in Rail Transport

5.7 Over the years, there has been a marked decline in the use of railways for the transport of livestock. This situation was commented on by several witnesses. For example, the Cattle Council summarised the evidence of other witnesses when it stated:

Until 20 years ago, the sight of livestock wagons on the various State rail systems was not uncommon. However, the flexibility and competitive pricing offered by road transporters soon led to rail stock-wagons' obsolescence. Rail's inability to compete with road transport was compounded by its failure in southern rail systems to satisfactorily manage 'perishable' livestock and to meet certain time-related expectations. As a result, transport of livestock by rail in New South Wales has been phased out completely.<sup>2</sup>

5.8 RSPCA Australia's submission commented on these changes in the following terms:

The transportation of animals by rail in Australia was at one time highly significant and a very important sector of the industry. This method has been losing favour, in part because of increasing efficiencies and better quality roads within the road transport sector. Also, because the relative inefficiency of having to double handle livestock for transportation on rail. With the increased costs of labour it is becoming more and more expensive to place a stockman on board stock trains and the costs attached to this method of transportation have now rendered it all but obsolete in certain states. RSPCA Australia has noted that the rail transportation of livestock in NSW will cease this year with the sale of the final few stock carriages left in the system (excepting a stock corridor to Victoria).<sup>3</sup>

5.9 The New South Wales Government conceded that its rail system cannot compete with road transport. According to the Government, rail is slower than road and plant and handling facilities have been allowed to run down.<sup>4</sup>

5.10 Similar comments were made by the Australian Meat and Livestock Corporation. Regarding railway systems in general, the Corporation claimed:

Most aspects of rail transport, including railway holding yards, yard maintenance, truck design, truck maintenance etc are less than adequate and need improvement.<sup>5</sup>

5.11 The age and poor maintenance of rolling stock were also criticised strongly by Dr Hugh Wirth, President of RSPCA Australia.<sup>6</sup>

### **Views on the Transport of Livestock by Rail**

5.12 Many witnesses who appeared before the Committee expressed concern about the attention given to animal welfare by rail authorities. Some witnesses suggested that this is a major reason for the switch from rail to road transport.<sup>7</sup> Dr Wirth, President of RSPCA Australia, commented:

Rail transport, I am very pleased to say... is being abandoned quite widely. In Victoria it took five prosecutions for cruel transport to get the point across ... that, quite frankly, those in charge of the livestock transport division for the Victorian Railways were not stockmen and knew nothing about the problems. New South Wales is about to abandon livestock transport by rail ... and I am glad of that too. I believe that, if we are to transport animals humanely, rail ought to be abandoned.<sup>8</sup>

5.13 Ms Oogjes, Executive Director of ANZFAS, also raised concerns about the welfare of animals transported by rail, including responsibility for inspections and care of animals in transit as well as the training and skills of the train drivers.<sup>9</sup>

5.14 Dr Peter Barnard, Director of Transport of the National Farmers' Federation, referred to the results of a study on bruising and other indicators of animal welfare incurred during various modes of transport. The study concluded that "rail came out worst".<sup>10</sup>

5.15 It was suggested to the Committee that rail's poor record in running to schedule, owing to both delayed departures and unplanned stops,

exacerbates animal welfare problems. For example, Dr Plant, a member of the Australian Veterinary Association, commented on "sheep leaving Broken Hill, where they had to be loaded at a certain time in the morning but probably did not leave until the afternoon".<sup>11</sup> Dr Wirth also commented:

There is the fundamental problem of priority. The railways departments of the various States still think that cattle or sheep being transported have no personal requirements such as water and shade. A train load of sheep has no priority. It is shunted into sidings. The fact that it might be in an unshaded area at 34, 35, 40 degrees is quite beside the point, and it sits there by the hour. So there is no fundamental knowledge of animal husbandry. Railways are removable objects to the RSPCA.<sup>12</sup>

5.16 Mr Clark, a member of the Australian Council of Livestock Agents, expressed a similar view. In regard to livestock wagons, he observed that "if it is a mixed goods train the railway people do not want to hear about how late it was."<sup>13</sup>

#### **Current Rail Services for Livestock**

5.17 During the inquiry, the Committee recognised that the comments noted above were general in nature and therefore welcomed evidence on the two major rail systems that currently carry livestock in significant numbers.

#### **Alice Springs to Adelaide**

5.18 Australian National Railways runs the rail service from Alice Springs to Adelaide. ANR schedules four services per week on which livestock may be carried. Mr Frank Morony, Business Manager, Bulk Products, ANR, told the Committee that Australian National Rail has around 90 per cent market share of cattle that move from the Northern Territory to the Adelaide area.<sup>14</sup> The service also carries feral horses. According to Mr Morony, ANR is in the process of withdrawing from all rail transport of livestock other than the movement of cattle and horses on the Alice Springs-Adelaide line. It sees its commitment to this traffic as long term.<sup>15</sup>

5.19 The conditions under which ANR carry livestock were explained by Mr Morony. He stated:

The conditions that we carry cattle and other livestock under are owner's risk conditions of carriage. That does not mean that we absolve ourselves from any responsibility or care, but, to be quite pragmatic about it, it is the only way it can be because most animal welfare issues ... are under the control of the clients rather than the railways.<sup>16</sup>

5.20 The Committee questioned Mr Morony further on the care of animals on this service. In response to questions on what happens if a steer falls down during the train trip, Mr Morony stated:

If the train crew become aware of livestock being down in a rail wagon, they will attempt to stand it up. I might say that we do not lay that down as one of their duties ... but they will do their best to stand cattle up.<sup>17</sup>

5.21 Although guards are present on livestock trains, Mr Morony emphasised that the owner of the livestock is responsible for the well-being of the animals.<sup>18</sup> He added that in the 18 month period to April 1991 only two complaints were lodged with ANR on injuries to animals.<sup>19</sup>

5.22 The Committee also questioned Mr Morony on the presence of train drovers during these trips. The Committee was advised that the decisions to employ train drovers are made by the clients or their agents. Because of the low incidence of stock losses, reduced transit times and associated costs, clients do not elect to employ a drover.<sup>20</sup> When questioned on whether owners should be required to provide a drover to accompany consignments of stock, Mr Morony expressed the view that such a requirement would be unnecessary.<sup>21</sup>

5.23 The Committee recognises that the provision of a train drover is the responsibility of owners of livestock. Nevertheless, the Committee considers that ANR must take a more positive role in promoting the welfare of animals that it transports.

5.24 *The Committee recommends that Australian National Railways take positive measures to encourage owners of livestock or their agents to provide train drovers for consignments of stock on ANR services.*

5.25 ANR's livestock service from Alice Springs to Adelaide was criticised by some witnesses. Dr Owen Williams, a Regional Veterinary Officer with the Northern Territory Department of Primary Industries and Fisheries, commented:

If the railways could get their act together and start running the train on time there would be a lot more people who would use the rail. Their promise when they put in this railway was that there would be a 30-hour trip between here and Adelaide. It sometimes runs at that level, but then you have instances of 48 hours - and that was last week when it was 40-something degrees and that was a hell of a stress. They were only cattle, thank goodness, otherwise you might have been listening to evidence in South Australia about dying horses ...I think that is where most of the damage here is done - in the shunting process associated with loading the train ...The train drover's job was to go and get [cattle which had gone down] back up again. That is not on here any more. The reason is, as I said, that the train is not supposed to stop. Unfortunately, that is not true; it does.<sup>22</sup>

5.26 The South Australian Department of Agriculture also commented on the Alice Springs-Adelaide service. In its submission, the Department stated:

The Department also has concerns over the scheduling of trains between Alice Springs and Adelaide. The Department is aware that trains may be unduly delayed when travelling on this route. It is not unusual for two trains travelling on this route to have travelling periods varying between 26 and 36 hours. Such differences should be eliminated to ensure that the period of transport is as short as possible.<sup>23</sup>

5.27 When appearing before the Committee, Dr Geoff Neumann, an officer of the Department, reported a subsequent improvement in travel times.<sup>24</sup>

5.28 The Committee invited Australian National Railways to respond to these specific criticisms. The Committee was provided with the following information on trains which may convey livestock:

<u>Day</u>	<u>Train No.</u>	<u>Schedule</u> <u>Departure</u> <u>Alice Springs</u>	<u>Schedule</u> <u>Arrival</u> <u>Adelaide</u>	<u>Day</u>	<u>Journey</u> <u>Time</u>
Mon	2338	2000 hrs	0415 hrs	Wed	32 hrs
Wed	4166	0100 hrs	0400 hrs	Thur	27 hrs
Fri	6166	0300 hrs	0600 hrs	Sat	27 hrs
Sat	7166	0200 hrs	1430 hrs	Sun	36½ hrs

Being general goods services these trains are not necessarily always required to convey livestock. A survey has been conducted of all of these trains during the period March to October 1990, and the following comments are based on that survey:

- No. 2338: . Only small numbers of cattle.  
 . Frequently arrives early.  
 . More than 2 hours late on occasions  
 (ie 3 hours and 7½ hours).
- No. 4166: . Usually arrives several hours early.  
 . 3 hours late on one occasion.
- No. 6166: . Conveys all cattle from regular Thursday Roe Creek  
 sales.  
 . Usually arrives several hours early.  
 . More than 2 hours late on one occasion (ie 4 hours).
- No. 7166: . Conveys cattle from wayside stations south of Alice  
 Springs. Journey time depends on the number of stops  
 to pick up cattle, and extent of delays waiting for cattle  
 to be loaded.  
 . Sometimes arrives early.  
 . More than 2 hours late on 5 occasions (ie 2½ hours, 4½  
 hours, 2 hours, 2 hours, 4½ hours).<sup>25</sup>

5.29 The information reproduced above indicates that, in the eight months to October 1990, a total of nine trains were more than two hours late on arrival. The Committee, however, notes that transit times exclude loading, unloading and shunting times and that late arrivals of less than two hours are not recorded.<sup>26</sup> Nevertheless, it would appear on this evidence that criticisms of excessive transit times are exaggerated.

5.30 The Committee notes that Train No. 7166 has a scheduled transit time of 36½ hours.<sup>27</sup> When times for loading, unloading and shunting are also taken into account, the total scheduled time for this journey is probably over 40 hours. The Committee recognises that if this trip involves cattle which are rested for 24 hours upon the completion of the journey, the transit time is within the 48 hour limit specified in the Code of Practice.

5.31 Nevertheless, the Committee is concerned that a journey of this duration is not in the interests of the welfare of the animals being transported and should be avoided.

*5.32 The Committee recommends that Australian National Railways review the operation of Train No. 7166 in order to ascertain whether transit times can be reduced.*

5.33 Criticisms were also made regarding rough shunting. Mr Morony, appearing on behalf of ANR, conceded that main-line crews are less experienced in the accurate positioning of wagons than local crews using locally-based shunting engines. He indicated, however, that local crews carry out over 80 per cent of this work and that problems in this area are minor.<sup>28</sup> The Committee notes that ANR's policy is to use local personnel and shunting vehicles in the future to an even greater extent than at present.<sup>29</sup>

5.34 Mr Morony also referred the Committee to other positive features of the Alice Springs to Adelaide service. These include the virtual suspension of large stock movements during summer months in order to safeguard the welfare of animals<sup>30</sup> and the exclusive use of single-decked wagons for horses even though the internal heights are considerably greater than those available in road vehicles.<sup>31</sup>



5.35 The Committee encourages ANR to adopt procedures and practices that pay due regard to the welfare of animals being transported on its rail services.

#### Queensland Rail Services

5.36 Rail services continue to play an important part in the transport of livestock in Queensland.

5.37 Mrs Ruth Wade, Executive Director of the Cattlemen's Union, described the service as "a fairly good method of transport over long distances from a welfare perspective". She also welcomed Queensland Rail's long-term commitment to the transport of livestock.<sup>32</sup>

5.38 Mr Clark, a member of the Australian Council of Livestock Agents, told the Committee that Queensland Rail urges agents and meatworks to provide train drovers for longer journeys. Some abattoirs and agents frequently employed their own drovers.<sup>33</sup> Mrs Wade confirmed these views when she commented that she had not seen a large train for a while that has not had a train drover.<sup>34</sup>

5.39 The Committee notes the positive comments on the operations of Queensland Rail.

5.40 The Committee received a detailed submission on the transport of horses by rail from Mrs Sarah Wynn, formerly of Landsborough, Queensland.<sup>35</sup> The submission included an account of her own observations of the condition of horses on arrival at the Landsborough railway yards during 1987 and 1988. It also included copies of six written accounts from other observers over the same period, some in the form of statutory declarations. These statements contain descriptions of animals suffering from serious injuries, illnesses, dehydration and other signs of ill-treatment.

5.41 The Committee has referred these matters to Queensland Rail, urging the appropriate authorities to monitor the welfare of animals on this particular service. The Committee encourages concerned citizens who witness similar occurrences to report them immediately to the police and/or RSPCA inspectors for investigation and appropriate action.

## Conclusion

5.42 Evidence to the Committee indicates that there is a continuing but reduced role for rail in the transport of livestock. The use of rail transport is also becoming confined to specialised services and specific routes.

5.43 The Committee considers that the welfare of animals being transported by rail will be enhanced if the period of transport is as short as possible. Accordingly, the Committee encourages all rail authorities, involved in the transport of livestock, to improve total transit times, including loading, shunting and unloading, running speeds and to reduce the number of stops.

## ENDNOTES

1. Australian Agricultural Council, *Model Code of Practice for the Welfare of Animals - Rail Transport of Livestock*, Canberra, 1983, p. 6.
2. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 450.
3. *Evidence*, RSPCA Australia, p. 64.
4. *Evidence*, New South Wales Department of Agriculture and Fisheries, p. 549.
5. *Evidence*, Australian Meat and Livestock Corporation, p. 577.
6. *Evidence*, RSPCA Australia, p. 155.
7. *Evidence*, Australian Meat and Livestock Corporation, p. 577.
8. *Evidence*, RSPCA Australia, p. 155.
9. *Evidence*, Australian and New Zealand Federation of Animal Societies, p. 240; p. 245; p. 246.
10. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 478.
11. *Evidence*, Australian Veterinary Association, p. 46.
12. *Evidence*, RSPCA Australia, p. 155.
13. *Evidence*, Australian Council of Livestock Agents, pp. 271-272.
14. *Evidence*, Australian National Railways Commission, p. 655.
15. *ibid.*, p. 640.
16. *ibid.*
17. *ibid.*, p. 659.
18. *ibid.*
19. *ibid.*, p.660.
20. *ibid.*, p. 650.

21. *ibid.*, p. 660.
22. *Evidence*, Northern Territory Government, p. 27; p. 29.
23. *Evidence*, South Australian Government, p. 597.
24. *ibid.*, p. 612.
25. *Evidence*, Australian National Railways Commission, p. 648.
26. *ibid.*
27. *ibid.*
28. *ibid.*, pp. 646-647; p. 656.
29. *ibid.*, p. 647.
30. *ibid.*, p. 660.
31. *ibid.*, p. 662.
32. *Evidence*, Cattlemen's Union, p. 727.
33. *Evidence*, Australian Council of Livestock Agents, p. 272.
34. *Evidence*, Cattlemen's Union, p. 727.
35. See *Evidence*, Australian and New Zealand Federation of Animal Societies, pp. 193-234.

## CHAPTER 6

### SEA TRANSPORT

#### Commonwealth Legislation

6.1 The conditions under which livestock may be transported interstate or overseas by sea are governed by Marine Orders, Part 43, (Cargo and Cargo Handling - Livestock). These Orders are made pursuant to the Navigation (Orders) Regulations under the *Navigation Act 1912*.

6.2 The prime objective of the Orders is the safe management of the ship. However, it is recognised that this is achieved in part by adequate containment and control of livestock on board. Accordingly, the Orders take into account a range of animal welfare aspects, including basic welfare considerations such as the fitness of animals for travel and the maintenance of health during travel. They cover fittings and equipment, loading densities, ventilation and the provision of fodder and water. Special provisions apply to short voyages that do not exceed 24 hours.<sup>1</sup>

6.3 According to the Commonwealth Department of Transport and Communications (DOTC), the only interstate transport of livestock by sea is between Tasmania, the Bass Strait Islands and Victoria.<sup>2</sup> The livestock trade across Bass Strait is in cattle and sheep and is predominantly from Tasmania to the mainland.<sup>3</sup> The Committee was advised that in the two years to 30 June 1990, mortality of both cattle and sheep was less than 0.1 per cent.<sup>4</sup>

6.4 The voyages involved are considerably shorter than the 24 hour maximum specified in the Marine Orders for 'short voyages'. As such, they are exempt from certain provisions of those Orders, for example those relating to feeding and watering in transit.

6.5 The Department of Transport and Communications, has established a Livestock Advisory Committee to advise it on matters relating to the carriage of livestock by sea, including a revision of Marine Orders, Part 43. This advisory committee is chaired by the Department's Chief Marine Surveyor and its membership comprises representatives of the Department of Primary Industries and Energy covering quarantine and veterinary services, State Departments of Agriculture, shippers, ship-owners and the RSPCA.<sup>5</sup>

6.6 The Committee was advised that the Livestock Advisory Committee has revised Marine Orders 43 and resulting amendments are due to come into effect in late 1991.

6.7 The revision of Marine Orders was prompted by a series of accidents to animals being conveyed across Bass Strait in Roll-on Roll-off road vehicles and portable equipment.<sup>6</sup> Proposed amendments to the Marine Orders incorporate the main provisions of the Road Transport Code relating to the design of vehicles used for carrying livestock.<sup>7</sup> In addition, proposed amendments will specify the maximum size of subdivisional pens and the minimum percentage of side areas that must be open in order to provide adequate ventilation.

6.8 Other proposed amendments provide for more rigorous inspections of vessels and their equipment prior to the taking on board of livestock, the provision of emergency water supplies, the qualifications and training of accompanying stockmen and loading densities for the various classes of livestock. Detailed specifications are set out for the design and location of securing points on vehicles to ensure their stability at sea. Care has been exercised to ensure that the new provisions are consistent with the relevant parts of the various Codes of Practice for the Transport of Animals.<sup>8</sup>

6.9 The Committee welcomes the proposed amendments. Although the draft proposals for amendments were agreed to by all parties in 1990, the Committee is critical of the fact that the final amendments have not been promulgated.

6.10 *The Committee recommends that the Department of Transport and Communications accord priority to the promulgation of amendments to Marine Orders Part 43, (Cargo and Cargo Handling - Livestock) pursuant to the Navigation (Orders) Regulations under the Navigation Act 1912.*

### **Model Code Of Practice**

6.11 The Australian Agricultural Council has also adopted a Model Code of Practice for the Transport of Livestock by Sea. The Code emphasises the importance of competent stockmanship in the husbandry and welfare of animals during sea transport. An important skill of the stockman is an ability to recognise the early signs of distress and to initiate prompt remedial action.

6.12 The Code addresses several matters designed to enhance the welfare of animals undergoing transport by sea. These include standards for shipboard accommodation, in-transit inspections, ventilation, protection from adverse weather or seaspray and food and water requirements.<sup>9</sup>

### **Operational Matters**

6.13 Only one matter relating to the welfare of animals being transported by sea was raised with the Committee.

6.14 Dr Peter Barnard, Director of Transport of the National Farmers' Federation, commented that, while the Marine Orders require a "competent stockman" to accompany all livestock in transit by sea, a similar requirement does not apply to loading and unloading. According to Dr Barnard, these operations are carried out by stevedores who are not required to have specific training or experience in the handling of stock.<sup>10</sup> This results in inefficient and harmful practices during loading and unloading of livestock at wharves.<sup>11</sup>

6.15 The Committee agrees that suitably trained personnel, experienced in handling stock should load and unload animals. In fact, in 1985, the Committee made a similar recommendation in its report on *Export of Live Sheep from Australia*.<sup>12</sup>

6.16 It was suggested to the Committee that "competent stockmen" from the ships' crews should be authorised to load and unload animals as necessary training facilities and programs already exist. The Committee notes that the welfare of the animals would also be protected by providing appropriate training to waterside workers. Indeed, this was the basis of the Committee's original recommendation made in 1985.

6.17 *The Committee recommends that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, ensure that properly trained personnel, experienced in stock handling, load and unload animals involved in transport by sea.*

## ENDNOTES

1. *Evidence*, Department of Transport and Communications, p.360.
2. *ibid.*, p. 358.
3. *ibid.*, p. 410.
4. *ibid.*, p. 412.
5. *ibid.*, p. 362.
6. *ibid.*, p. 361.
7. *ibid.*, p. 362.
8. *ibid.*, pp. 414-420.
9. Australian Agricultural Council, *Model Code of Practice for the Welfare of Animals - Sea Transport*, Canberra, 1986.
10. *Evidence*, Cattle, Sheepmeat and Wool Councils, p. 471.
11. *ibid.*, pp. 487-489.
12. Senate Select Committee on Animal Welfare, *Export of Live Sheep from Australia*, AGPS, Canberra, 1985, p. 74.



**FORMER MEMBERS OF THE COMMITTEE**

Senator Ray Devlin, Tasmania

- Member September 1987 to June 1990
- Chairman August 1989 to June 1990

Senator Jack Evans, Western Australia

- Member December 1983 to June 1985

Senator George Georges, Queensland

- Chairman December 1983 to June 1987

Senator Jean Hearn, Tasmania

- Member December 1983 to June 1985

Senator John Morris, New South Wales

- Member September 1987 to May 1990
- Chairman September 1987 to August 1989

Senator Norm Sanders, Tasmania

- Member August 1985 to March 1990

Senator the Hon. Doug Scott, New South Wales

- Member December 1983 to June 1985

Senator John Siddons, Victoria

- Member July 1985 to August 1985

## APPENDIX 2

### INDIVIDUALS AND ORGANISATIONS THAT PROVIDED THE COMMITTEE WITH SUBMISSIONS

Australian and New Zealand Federation of Animal Societies, Collingwood,  
Victoria

Australian Chicken Meat Federation, North Sydney, New South Wales

Australian Council of Livestock Agents, Melbourne, Victoria

Australian Equine Veterinary Association, Artarmon, New South Wales

Australian Livestock Transporters' Association, Canberra, Australian  
Capital Territory

Australian Meat and Livestock Corporation, Sydney, New South Wales

Australian National Parks and Wildlife Service, Canberra, Australian  
Capital Territory

Australian National Railways Commission, Keswick, South Australia

Australian Pig Industry Policy Council, St Leonards, New South Wales

Australian Pigeon Fanciers Association Inc, Graystones, New South  
Wales

Calvinistic Political and Social Association, Albany, Western Australia

Cattle Council of Australia, Canberra, Australian Capital Territory

Cattlemen's Union, Rockhampton, Queensland

Copland, Dr R., St Lucia, Queensland

Department of Transport and Communications, Canberra, Australian  
Capital Territory

Haulmark Trailers Australia, Rocklea, Queensland

Hugo, Mrs R., Aldinga, South Australia

Mackay and District Pastoral Agricultural and Industrial Association,  
Mackay, Queensland

Metro Meat Limited, Peterborough, South Australia

New South Wales Government, including Department of Agriculture and  
Fisheries, Sydney, New South Wales

Northern Territory Government, Darwin, Northern Territory

Queensland Department of Primary Industries Brisbane, Queensland

RSPCA Australia, Canberra, Australian Capital Territory

Sheepmeat Council of Australian and Wool Council of Australia,  
Canberra, Australian Capital Territory

South Australian Government, Adelaide, South Australia

Task Force on Volume Loading of Livestock, Brisbane, Queensland

Tasmanian Government, Hobart, Tasmania

Victorian Avicultural Council, Ashburton, Victoria

Victorian Department of Agriculture and Rural Affairs, Melbourne, Victoria

Wynn, Mrs S., Dubbo, New South Wales

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THE COMMITTEE**

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Victoria

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- Ms G. Oogjes, Director

Australian Council of Livestock Agents, Melbourne, Victoria

- Mr M. Clark, Representative
- Mr R. Levy, Executive Director
- Mr D. Skinner, Immediate Past President

Australian Livestock Transporters' Association, Canberra, Australian  
Capital Territory

- Mr R. Gunning, Executive Director
- Mr A. Higginson, Co-ordinator, Road Transport Industry  
Forum

Australian Meat and Livestock Corporation, Sydney, New South Wales

- Mr H. Gardner, Chief Executive and Director, Computer Aided  
Livestock Marketing Services
- Mr A. Humphries, Communications Manager, Australian Meat  
and Livestock Research and Development Corporation

Australian National Parks and Wildlife Service, Canberra, Australian Capital Territory

- Mr M. Hill, Deputy Director
- Mr R. Jenkins, Manager, Co-ordination, Marine and International Section, Office of Wildlife Conservation

Australian National Railways Commission, Keswick, South Australia

- Mr F. Morony, Business Manager (Bulk Products)

Australian Pig Industry Policy Council, St Leonards, New South Wales

- Dr J. Barnett, Scientific Adviser
- Mr P. Brechin, Producer Member
- Mr I. Whan, Processor Member
- Mr C. Winfield, Scientific Adviser

Australian Veterinary Association including the Australian Equine Veterinary Association, Artarmon, New South Wales

- Dr C. Bassett, President, Australian Equine Veterinary Association
- Dr P. Ellis, Member of Executive Committee, Australian Equine Veterinary Association
- Dr J. Plant, President-elect, Australian Veterinary Association

Cattlemen's Union, Rockhampton, Queensland

- Dr L. Carroll, Convenor, Animal Welfare Sub-Committee
- Mrs R. Wade, Executive Director

Copland, Dr R., St Lucia, Queensland

Department of Transport and Communications, Canberra, Australian Capital Territory

- Mr P. Anyon, Division of Road Safety
- Mr T. Rose, Chief Marine Surveyor, Ship Safety Branch
- Mr J. Shaw, Acting Director, Land Transport Development
- Mr I. Williams, Assistant Secretary, Ship Safety Branch
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Haulmark Trailers Australia, Rocklea, Queensland

- Mr M. Johnston, Manager, National Sales and Marketing
- Dr C. Alford, President, Livestock Transporters' Association of Queensland

Metro Meat Limited, Peterborough, South Australia

- Mr P. Hubbard, Manager

New South Wales Department of Agriculture and Fisheries, Sydney, New South Wales

- Mr B. Andrews, Principal Livestock Officer (Beef Cattle)
- Mr B. Healy, Acting Principal Veterinary Officer
- Mr B. Johnston, Special Livestock Officer (Beef Cattle)

Northern Territory Government, Darwin, Northern Territory

Conservation Commission of the Northern Territory

- Mr D. Berman, Ecologist, Alice Springs
- Mr R. Bryan, Senior Wildlife Ranger, Alice Springs

- Dr K. Johnson, Officer-in-Charge, Flora and Fauna Unit, Alice Springs

Department of Primary Industry and Fisheries

- Mr D. Napier, Principal Stock Inspector, Darwin
- Mrs J. Purdie, Assistant Principal Stock Inspector, Darwin
- Dr O. Williams, Regional Veterinary Officer, Alice Springs

Department of Transport and Works

- Mr J. Hollins, Manager, Vehicle Standards, Darwin

Producer Councils

Cattle Council of Australia, Canberra, Australian Capital Territory

- Mr J. Toohey, Deputy Director

National Farmers' Federation, Canberra, Australian Capital Territory

- Dr P. Barnard, Director of Transport

Sheepmeat Council of Australia, Canberra, Australian Capital Territory

- Mr K. Shiell, Executive Director

Wool Council of Australia, Canberra, Australian Capital Territory

- Ms M. Thomson, Assistant Director

Queensland Government, Brisbane, Queensland

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- Mr J. Lapworth, District Adviser, Beef Cattle Husbandry Branch

Department of Transport

- Mr A. Meares, Director, Road Transport and Traffic Division
- Mr R. Leeson, Chairman, Task Group on Volume Loading of Livestock

RSPCA Australia, Canberra, Australian Capital Territory

- Dr H. Wirth, President
- Mr C. Wright, Executive Officer

South Australian Government, Adelaide, South Australia

Department of Agriculture

- Dr G. Neumann, Principal Veterinary Officer

Department of Environment and Planning

- Dr M. Barton, Chairman, Animal Welfare Advisory Committee
- Ms J. Farrelly, Executive Officer, Animal Welfare

Department of Road Transport

- Mr R. Ide, Manager, Vehicle Operations

Victorian Department of Agriculture and Rural Affairs

- Mr G. Eldridge, Livestock Research Scientist, Institute of Animal Science, Werribee



**MODEL CODE OF PRACTICE  
FOR THE WELFARE OF ANIMALS**

**ROAD TRANSPORT OF LIVESTOCK**

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OF ANIMALS**

**3. ROAD TRANSPORT OF  
LIVESTOCK**



**Issued by the Australian Bureau of Animal Health**

**1983**

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PREFACE

This Model Code of Practice for the Welfare of Animals has been prepared by the Sub-Committee on Animal Welfare (SCAW) of the Animal Health Committee within the Australian Agricultural Council (AAC) system.

Membership of SCAW comprises representatives from each of the State Departments with responsibility for agriculture, CSIRO, Commonwealth Department of Health, Australian Bureau of Animal Health and other committees within the AAC.

The Code is intended as a model to enable the States to develop codes of practice to meet their individual needs.

This Model Code was endorsed by Australian Agricultural Council at its 116th meeting (Sydney, February 1983) for consideration by States in consultation with their industries.

The Model Code may be revised to take account of advances in the understanding of animal physiology and behaviour, technological changes in animal husbandry and their relationship to the welfare of animals.

This Model Code has been issued by:

Australian Bureau of Animal Health  
Department of Primary Industry  
CANBERRA ACT 2600

INTRODUCTION

This Code of Practice is intended as a guide for people who are involved in transporting livestock by road. It emphasises the responsibilities of the owner of the animals, and of the driver and attendant. It is intended to encourage the efficient, considerate treatment of animals and birds so that transport stress and injury are minimised at all stages of the transport operation.

Transportation by road requires careful planning to reduce any adverse effects on animals. The selection, handling and preparation of animals should be undertaken or supervised by competent stockmen.

Persons organising the transport of animals should contact the local office of the Department of Agriculture well in advance of transportation to ascertain any requirements for health certification and welfare of the animals. This will ensure that approvals and documentation are completed before the planned commencement of the journey, thereby minimising delays which may affect the well-being of the animals.

Animals being transported by road are subjected to a number of stresses which may have cumulative effects. Stressful influences may include:

- . yarding and handling;
- . deprivation of food and water;
- . changes in climatic conditions;
- . overcrowding or isolation, unfamiliar surroundings, noises and sensations;
- . insufficient care during road transportation;
- . physiological responses associated with pregnancy.

For the purpose of this Code, transport includes loading, waiting periods during loading, transit, rest periods and unloading at the point of destination.

Transporters have a responsibility to get animals to their destination as speedily as possible, within the confines of legal requirements, and to minimise any adverse effects on them.

The driver of the vehicle is responsible for the care and welfare of all animals during transport except when either an attendant appointed by the owner or an agent of the owner travels with the consignment. Good management and careful driving are important to the welfare of animals carried by road.

This Code is based on knowledge and technology available at the time of publication and may need to be varied in the light of new knowledge.

ASSEMBLY AND SELECTION OF STOCK FOR TRANSPORT1. Assembly of Stock

Animals may be stressed by mustering, but most affected are those which are not accustomed to handling, pregnant females, young or old animals, and certain breed types. A rest period of at least 12 hours is beneficial for excitable animals such as cattle mustered by helicopter and light plane. This will reduce stress during subsequent transportation.

Assembly yards should be provided with sufficient drinkable water to cater for the number of stock to be handled. The water should be provided in troughs so that all ages and classes of stock can drink.

If animals are to remain in yards for more than 24 hours before loading, or if animals are to travel for 24 hours or more, feed as well as water should be provided.

Shelter from heat, wind and cold is not considered necessary for sheep, cattle, horses and goats except in extreme climates. Pigs are more susceptible to temperature stress and shelter and a supply of cool drinkable water should be provided.

2. Selection of Stock

The owner or his agent has a responsibility to select only fit and healthy animals for travel. Rejections would include sick, injured or weak animals, and females in late pregnancy.

Exceptions to the above recommendations are:

- . animals that are either ill or injured and which must be transported to and from a place for veterinary treatment;
- . animals being transported a short distance to a place for emergency humane destruction;
- . salvage operations, e.g. from a drought area. Only those animals judged to be capable of surviving the journey should be transported.

Humane and effective arrangements should be made by the owner or his agent for the handling and care of animals rejected as unsuitable for loading. Such arrangements may include humane destruction. Recommended methods for the humane destruction of cattle, sheep, horses, goats, pigs and deer are given in Appendix 4.

Certain classes of stock, e.g. calves and adult cattle, should be transported in separate vehicles. Alternatively, they may be transported in the same vehicle if they are separated by partitioning. Further details are given in Appendix 3.

#### RECOMMENDED STANDARDS FOR TRANSPORT VEHICLES

Transport vehicles should be as clean as practicable when presented for loading.

There should be no protrusions or sharp edges capable of injuring animals on the framework, doorways, floors or partitions. Hinges and latches should not project into the pathway of animals.

Gates should operate smoothly and retract fully from the pathway of animals. Gates should not be susceptible to jamming due to impact by animals or due to transit shock and vibration.

Gates should be clearly visible to animals when shut; this can be achieved by providing a "sight board" for adequate visibility.

Internal sheeting of the sides should be smooth and have a large area of contact with animals to eliminate pressure points and reduce bruising.

Deck height should be sufficient for the type of animals being carried to stand without contacting overhead structures.

The floor of the vehicle should be made of a non-slip material which can be easily repaired and which will not injure the hooves or legs of animals.

The deck structure of multi-deck vehicles should be constructed to minimise soiling of animals on the lower decks.

The spacing of the side rails should prevent animals from jamming their heads and legs between rails. The sides of the vehicle should be high enough to prevent animals escaping.

The materials used in the construction of transport vehicles should be of a type which can be effectively cleaned.

Partitions and secure fittings to suit the design of the stock crate should be available to prevent overcrowding and jolting.

The exhaust system of the vehicle should not pollute the air inside the stock crate.



## DESIGN AND CONSTRUCTION OF RAMPS AND HOLDING YARDS

Loading facilities should be constructed so that they are unlikely to cause injury to animals.

The ramp should be wide enough to allow for the hips of mature animals.

A flat area at the top of the ramp not less than 1 metre in length assists loading and unloading of animals. This platform should be approximately at the same level as the stock crate floor.

A slope of 1 in 3 (about 20 degrees) is recommended for permanently installed ramps. The surface should be made of a non-slip material with either cross-cleats or, if concrete, a suitably cross-grooved pattern or steps to provide a good grip when the ramp is wet.

Portable or adjustable ramps should have a slope of not more than 1 in 2 (about 27 degrees) and they should be equipped with anchoring devices.

The inner rails should be smooth with no sharp projections which may injure animals. Provision of a removable bottom rail is a useful measure.

Provision of a walkway on the outside of the ramp for use by an attendant will facilitate stock movement.

Filler boards or flaps should be used to cover any gap between the loading ramp and the floor of the stock crate.

The importance of Travelling Stock Reserves (TSRs) in remote areas should be recognised by authorities responsible for them. Their numbers should not be reduced where long distances must be travelled by stock. All TSRs should be clearly identifiable and drinking water should be available in all paddocks at all times.

## LOADING AND UNLOADING

### 1. Loading of Animals

Planning the loading procedure well in advance will allow adequate time for stock to be loaded quietly and with care. Animals should be loaded in a way that does not cause them injury.

Artificial lighting to illuminate the loading ramp is desirable for loading at night.

Methods of assisting loading include:

- . making use of the behavioural and group characteristics of particular species;
- . electric prods; these should be powered only by battery or dynamo and should be of a type approved by the Australian Standards Association. Their use should be restricted to the minimum necessary to complete loading. The continual prodding of animals which have little or no room to move should not be permitted. They should not be used on horses or young animals;
- . "flappers" (a length of cane with a short strap of leather or canvas attached) or "metallic rattles" are ideal in that they encourage movement in response to sound. The use of sticks, lengths of heavy plastic, metal piping or heavy leather belts should not be permitted as methods of encouraging stock to move;
- . well-trained dogs are useful to assist loading of stock, but those which bite should be either muzzled or not permitted to work. The number of dogs used should be strictly limited to that necessary to complete the task.

During loading, the stock crate's door needs to be properly aligned with the loading race to ensure the smooth movement of stock and to minimise bruising.

Different animal species, e.g. sheep and goats, should not be mixed during transport.

Where possible vehicles should be loaded and unloaded from the rear rather than through the side. Alternatively, V-shaped doorways may be used. Both will help reduce the bruising which may occur when stock strike the door frame while making the 90-degree turn into or from the stock crate.

Loading should be supervised by experienced stockmen. Supervisors should ensure that spectators do not interfere with the smooth loading of animals.

Animals should not be lifted off the ground by the head, horns, legs or wool during loading or unloading.

Animals of different species and ages require different amounts of floor space. Guidelines on space allowances are given in Appendix 1.

To facilitate emergency decisions or actions the driver or attendant should ensure that he is provided with the name and telephone number of the owner of the animals or his agent.

Working dogs should not be transported in the stock crate with livestock. Not only does this practice cause extreme psychological stress to animals, but greatly decreases space allowances due to crowding and creates an opportunity for dogs to interfere with stock. Dogs should be transported out of the sight of stock, e.g. in the vehicle cabin with the driver, or in a suitably designed and ventilated kennel elsewhere on the vehicle.

## 2. Unloading of Animals

Similar requirements to those listed under "Loading of Animals" should apply to the unloading of stock, recognising that they are more stressed at the end of the journey.

Animals should be unloaded as soon as possible after arrival at the destination. Injuries to stock will be reduced if they are given the opportunity to walk quietly off the vehicle.

All stock should be given access to water when unloaded. Animals to be held in yards for 24 hours or more should also be provided with food.

At the destination there should be facilities for the humane unloading or slaughter of animals which may be unable to walk off because of injury or exhaustion.

### IN-TRANSIT INSPECTION

Inspection of animals should be carried out by either the driver or attendant, at roadside, not later than 30 minutes after commencement of the journey, and thereafter at intervals of at least every two hours.

A suitable source of lighting should be available to carry out inspections at night.

Any animal found to be down, injured, distressed or with a limb protruding should be given immediate assistance by the driver or attendant. Every effort should be made to get cast animals to their feet.

Veterinary, police or RSPCA assistance should be sought as soon as possible for distressed or severely injured animals. If necessary, they should be humanely destroyed without delay according to recommendations in Appendix 4.

### DURATION OF JOURNEY AND REST STOPS

As stated in the Introduction animals being transported by road are subjected to a number of stresses that may have cumulative effects. Unloading and loading imposes some stress on animals. Rest stops extend the total time of the journey and subject animals to unfamiliar surroundings. Thus it should be recognised that unloading and loading of animals for rest stops may impose a greater stress than continuing the journey for a limited period of time.

After each 24 hours of travel, a rest period of between 12 and 24 hours should be provided for:

- . all immature ruminants (under 3 months of age);
- . horses (including brumbies);
- . pigs (see below)

The period of travel for these animals may be extended to 36 hours if a full 24 hour rest period is provided before the next stage of the journey is commenced.

In the case of mature ruminant animals (sheep, cattle, goats and buffalo), a rest period of between 12 and 24 hours should be provided after each 36 hours of travel. The period of travel may be extended to 48 hours if a full 24-hour rest period is then provided.

During the rest period, the animals should be

- . unloaded;
- . have access to food and water;
- . have enough space for exercise and rest.

Animals transported singly, or in small groups, and fed and watered in transit should be unloaded and exercised every 36 hours if there is not enough room in the vehicle for them to lie down.

Guidelines on food and water requirements of livestock during transport are presented in Appendix 2.

All journeys with animals should be completed as quickly as possible, within limits imposed by rest stops and road safety.

Unloading and reloading of pigs is undesirable and the following alternative arrangements are suggested. When a journey will take more than 24 hours pigs should be given comfortable accommodation with sufficient room in which to lie. Sufficient feed and water for the duration of the journey should be provided within ready access of the pigs.

Separate recommendations for deer are presented in Appendix 3.

Care should be taken to avoid prolonged deprivation of feed and water when animals are unloaded after being transported and then reloaded for a further journey. A calculation should be made of the total period of deprivation of feed and water from the time of initial loading until unloading at the end of the second journey. If this period exceeds 24 hours special arrangements to feed and water the animals during the holding period should be made in order to reduce stress and dehydration. This sequence of events is relatively common for animals transported to saleyards and then forwarded to the property of the new owner.

APPENDIX 1RECOMMENDED LOADING DENSITY DURING ROAD TRANSPORT

Packing of animals either too loosely or too tightly in stock crates predisposes them to injury; partitions should be used to reduce the likelihood of injury.

The density of loading of animals in stock crates should be determined by the need to minimise injury but allow cast animals to rise with assistance.

The driver is responsible for ensuring that the loading density and penning arrangements are compatible with the welfare of the animals and the capacity of the vehicle.

1. CATTLE: Use for cattle with horns or tipped horns; for cattle without horns, decrease the space allowance by 5%.

Average Weight (kg)	Floor Area (m <sup>2</sup> /head)	Number of Head Per 12.2 m (40 ft) Deck
250	0.70	42
300	0.74	40
350	0.78	38
400	0.87	34
450	0.99	30
500	1.06	28
550	1.14	26
600	1.23	24
650	1.35	22

2. CALVES: Applies to all cattle in the 100 to 200 kg weight range.

Average Weight (kg)	Floor Area (m <sup>2</sup> /head)	Number of Head Per 12.2 m (40 ft) Deck
100	0.34	80
125	0.39	76
150	0.47	62
175	0.55	54
200	0.61	48

3. **SHEEP:** Calculations of sheep numbers per deck have been based on animals in half-wool. When transporting full-wool sheep it is suggested that numbers be reduced by up to 10 head.

Average Weight (kg)	Floor Area (m <sup>2</sup> /head)	Number of Head Per 12.2 m (40 ft) Deck
20	0.17	170
30	0.19	150
40	0.22	130
50	0.27	110
60	0.29	100

4. **PIGS:** Use the following table when the temperature is below 25°C. Pigs need about 10% more floor area in a truck when the temperature is over 25°C.

Average Weight (kg)	Floor Area (m <sup>2</sup> /head)	Number of Head Per 12.2 m (40 ft) Deck
50	0.22	132
75	0.29	100
100	0.35	83
125	0.42	69
150	0.48	60
175	0.55	53
200	0.61	48

(Conversion factor: 1.0 m<sup>2</sup> = 10.8 ft<sup>2</sup>)

5. **GOATS:** Recommendations for domesticated goats are similar to those for sheep.
6. **DEER:** As a guide, for journeys over two hours duration, the minimum floor space allocated for adult male deer in transport crates should be:
- 0.5 m<sup>2</sup> for Fallow deer
  - 0.7 m<sup>2</sup> for Rusa deer
  - 1.0 m<sup>2</sup> for Red deer.

Female deer should be allocated at least 75% of the area required by males.

For journeys over 24 hours the allocated space should be increased by at least 20%.

7. HORSES: Loose penning of horses.

Age	Floor Area (m <sup>2</sup> /head)
adults	1.2
18-24 months	1.0
12-18 months	0.9
5-12 months	0.6

(Conversion factor: 1.0 m<sup>2</sup> = 10.8 ft<sup>2</sup>)

8. DOMESTIC FOWLS: Growing and adult fowls.

Recommended maximum liveweight densities are:

hot weather: 55 kg/m<sup>2</sup>  
 other times: 60 kg/m<sup>2</sup>

APPENDIX 2GUIDELINES ON THE FOOD AND WATER  
REQUIREMENTS OF LIVESTOCK

Class of Stock (Adults)	Water* (litres/head/day)	Food** (kg/head/day)
Horses	25	6
Cattle	45	5
Sheep & Goats	4	1
Pigs	5	2

(Conversion factors: 1.0 litre = 0.22 gal; 1.0 kg = 2.2 lb)

- \* Extremely hot weather (greater than 40°C) may double the figures.
- \*\* The food suggested is good quality hay for cattle, horses, sheep and goats, and a proprietary grower ration for pigs.



APPENDIX 3SPECIAL REQUIREMENTS OF STOCK

This Appendix contains recommendations on the special welfare requirements of horses, cattle, sheep, pigs, goats, deer and poultry during road transport. The recommendations supplement those made elsewhere in this Code.

Recommended stocking densities for each species during transportation are given in Appendix 1.

Recommended food and water allowances for stock are given in Appendix 2.

1. HORSES

It is recommended to either transport or pen separately:

- . unbroken horses;
- . stallions;
- . mares in advanced pregnancy;
- . a mare with a foal at foot;
- . horses greatly different in size.

Horses, except young or unhandled animals, should wear head stalls which are fitted so as not to endanger the animal. The lead of the head stall should be secured to the vehicle or stall using a quick release knot.

Removal of the shoes will reduce the risk of injury caused by kicking or slipping.

Mares that are more than ten months pregnant should not be transported for more than eight hours due to the increased risk of metabolic disease and injury. Pregnant mares should be offered food and water as soon as possible after arrival at the destination.

Lame or sick horses should not be transported unless for veterinary treatment.

## 2. CATTLE

It is recommended to either transport or pen separately:

- . young calves;
- . a cow with a suckling calf;
- . hornless cattle;
- . adult bulls;
- . cattle greatly different in size;
- . females in advanced stages of pregnancy.

Lactating dairy cows in full production and without calves at foot should be milked at intervals not exceeding 24 hours.

When bulls are haltered and tied within the stock crate, the shank should not be fitted through a nose ring.

Calves should be strong enough to withstand the stresses of transportation. They should be transported in vehicles with enclosed fronts to prevent wind-chill. Calves weighing less than 23 kg, or those with wet umbilical cords should not be presented for transport.

Cows more than eight months pregnant should not be transported for journeys taking longer than eight hours due to the increased risk of metabolic disease and injury. They should be offered food and water as soon as possible after arrival at the destination.

## 3. SHEEP

It is recommended to either transport or pen separately:

- . sheep which differ greatly in size;
- . ewes and sucker lambs;
- . ewes in advanced stages of pregnancy;
- . rams.

Newborn lambs and newly shorn sheep are particularly susceptible to wind-chill and should be transported in vehicles with enclosed fronts.

Ewes that are more than four months pregnant should not be transported on journeys taking longer than eight hours, pregnant ewes should be offered food and water as soon as possible following arrival.

#### 4. PIGS

Loading of pigs for transport presents special problems, particularly if they are not accustomed to being herded. Patience is essential and proper design of yards, loading ramp and other associated services will facilitate loading with minimum distress and bruising.

A canvas slapper is the best tool for moving pigs. Electric prods should be used sparingly.

It is recommended that the following classes be transported or penned separately:

- . young piglets;
- . sows with piglets;
- . adult boars;
- . unfamiliar groups of pigs (where possible).
- . sows in advanced pregnancy.

Pigs are susceptible to extremes of heat and cold. In very hot weather (38°C or more) it is undesirable to transport pigs. If transport is undertaken during hot weather, shade should be provided and the vehicle should be well ventilated. When the vehicle is stationary shade should be provided or pigs should be unloaded promptly as heat will build up rapidly within an enclosed stock crate.

Consideration should be given to the need for, and effectiveness of, roofing or shade cloth over vehicles operating in tropical areas to reduce heat stress in animals.

In cold weather straw or other dry bedding is desirable, and pigs should be protected from wind and rain.

Pigs should be unloaded as soon as possible after arrival at the destination. All pigs should be given access to water when unloaded including those consigned directly for slaughter. Pigs to be held in yards for 24 hours or longer should also be provided with feed.

#### 5. GOATS

Recommendations for domesticated goats are similar to those for sheep.

6. DEER

It is recommended to either transport or pen separately:

- . deer of different species;
- . stags/bucks;
- . hinds/does;
- . young animals.

Deer should not be transported for more than 24 hours without water or for more than 36 hours without food. Deer should be allowed a rest period of six hours after each 24 hours of travel. When deer are transported on rough roads, these rest periods may be increased in frequency and duration. It is not necessary to unload deer during rest periods.

Deer due to calve within one month or with young at foot less than one month of age should not be transported unless it is an emergency for the welfare of the deer.

Male deer with antlers in velvet should not be transported.

Male deer with hard antlers should be transported separately from other deer.

Deer should be transported under conditions of subdued lighting, e.g. at night, or an enclosed vehicle. Under such conditions deer are less likely to incur trauma or develop transport stress.

Adequate ventilation through light-proof vents is essential in enclosed vehicles to remove fumes from excreta, and to control temperature.

Deer should not be transported when the ambient air temperature in the shade exceeds 30°C or when the temperature inside the crate exceeds 35°C. If the deer show signs of heat stress or dehydration (panting, dry mouth, reduced response to normal stimuli) the crate should be placed in the shade and/or the deer hosed with cold water.

7. DOMESTIC FOWLS

a) Newly-Hatched Chicks

Chicks should be placed in suitably ventilated containers without overcrowding.

Delays in transport should be minimised and every attempt made to avoid chilling or overheating. Chicks should be placed in a brooding environment as soon as possible after delivery.

Containers for transport of newly-hatched chicks should be clearly marked with the date and time of despatch. Written instructions on required holding conditions for the attention of those responsible for transportation.

Chicks which are unable to be brooded within 72 hours of despatch should be destroyed humanely.

b) Growing and Adult Poultry

The design, construction and state of repair of any crate or container used to carry birds should allow them to be put in, conveyed and taken out without injury.

Containers should be ventilated and deep enough (about 25 cm) to allow all birds space to stand, move and seek comfort, but prevent bruising during transport.

Covers should be used to protect birds in crates from wind and rain and from excessively hot or cold conditions.

Birds should not be held in crates or containers for longer than 24 hours unless they are provided with food and water.

APPENDIX 4HUMANE DESTRUCTION OF STOCK

Previous sections of this code have drawn attention to those circumstances in which stock may need to be humanely destroyed, e.g. following serious illness or injury during transport.

Whilst this task is aesthetically unpleasant to most people, the method of slaughter should be effective and cause sudden and painless death for the animal. It is equally important that the animal be handled quietly beforehand to ensure it is not unnecessarily distressed or alarmed.

The methods recommended hereunder are those which are considered the most suitable during road transport of livestock.

1. USE OF THE FIREARM

The most efficient and widely available method of humanely destroying farm livestock during road transport is a gunshot to the brain from a close range. There may, however, be legal restrictions on the use of firearms on public roads. Under those circumstances assistance should be sought from veterinary practitioners, the RSPCA or the Police.

The following aspects of firearms safety should be borne in mind:

- . A .22 calibre rifle or a .32 calibre humane killer pistol is adequate for humane destruction of most animals;
- . Any use of firearms is potentially hazardous;
- . Persons other than the marksman and a handler for the animal, should be cleared from the area or should stand well behind the marksman;
- . Never fire while the animal is moving its head; wait patiently for a quiet interval before firing;
- . To provide maximum impact and the least possibility of misdirection the range should be short as circumstances permit;
- . Whilst the humane killer pistol and captive-bolt pistol are designed to be pressed firmly on the head prior to being discharged, it is not safe to do this with a standard rifle or pistol.

## 2. USE OF THE CAPTIVE-BOLT PISTOL

An alternative to the firearm is to use a captive-bolt pistol which is safer since a blank cartridge is used. The operator does not have to be a marksman as the instrument's muzzle is firmly pressed against the skull before firing. It must, however, be assumed that the animal has only been stunned and a follow-up method of ensuring death, such as bleeding out, is required.

Blank cartridges for the captive-bolt pistol are colour-coded according to amount of charge they contain. For best results, the manufacturer's recommendations should be followed on the most appropriate blank cartridges for different farm animals. Regular maintenance of the captive-bolt pistol is essential for efficient stunning.

## 3. SPECIAL REQUIREMENTS OF STOCK

### a) Horses

A head collar or bridle should be put on the animal to enable it to be quietly restrained by an assistant who must stand out of the line of fire. Restless animals should be blindfolded.

Frontal method: the captive-bolt pistol or firearm should be directed at the point of intersection of diagonal lines taken from the base of each ear to the opposite eye. The bullet should be directed horizontally to ensure the brain is damaged (see Figure 1).

Temporal method: only suitable for firearms; the horse is shot from the side so that the bullet enters the skull midway between the eye and the base of the ear on the same side of the head. The bullet should be directed horizontally.

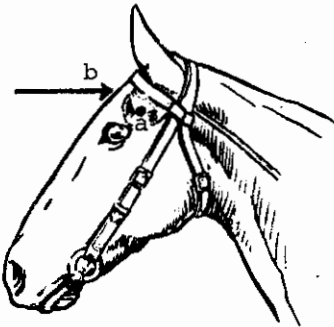


Figure 1: Humane destruction of horses

"a" indicates recommended position for temporal method (suitable for firearm only).

"b" indicates recommended position for frontal method (suitable for firearm or captive-bolt pistol).

Only a suitably-designed captive-bolt pistol\* should be used to destroy horses. The manufacturer's instructions must be followed for best results. Major blood vessels of the neck should be severed as soon as possible, taking care to avoid injury caused by the animal's involuntary movements.

b) Cattle

Frontal method: the captive-bolt pistol or firearm should be directed at the point of intersection of lines taken from the base of each ear to the opposite eye (see Figure 2).

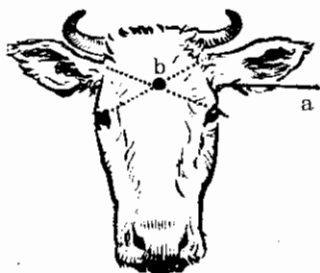


Figure 2: Humane destruction of cattle.

"a" indicates recommended position for temporal method. (Suitable for firearms only)

"b" indicates recommended position for frontal method. (Suitable for firearm or captive-bolt pistol).




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\* The CASH SPECIAL and Model 8000 COWPUNCHER are claimed to be suitable for horses. They are available from:  
 Donald Mackintosh Abattoirs Pty Ltd,  
 473 Elizabeth Street,  
 Melbourne Vic 3000

Phone: (03) 329 6100



Temporal method: only suitable for firearms. The animal is shot from the side so that the bullet enters the skull midway between the eye and the base of the ear on the same side of the head. The bullet should be directed horizontally.

When the animal has been stunned using a captive-bolt pistol, it should be bled out as soon as it collapses to the ground by severing the major vessels of the neck. To avoid injury due to the animal's involuntary leg movements, the operator should stand behind the neck.

c) Sheep

. Hornless sheep and rams:

- using a firearm or captive-bolt pistol: the instrument is directed at the top of the head. The firearm is aimed towards the gullet. Alternatively, the instrument may be placed just behind the poll and aimed in the direction of the animal's muzzle. Both methods are illustrated in Figure 3.



Figure 3: Recommended position and direction of fire for captive-bolt pistol or firearm - Hornless sheep and rams.

. Horned sheep and rams

- using a captive-bolt: the top of the head position may not be suitable, in which case the instrument may be placed behind the poll and aimed in the direction of the animal's muzzle (see Figure 4).

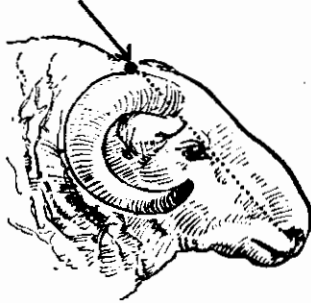


Figure 4: Recommended position and direction of fire for captive-bolt pistol - Horned sheep and rams.

- using a firearm: shoot at a point in the middle of the face just above the level of the eyes whilst aiming toward the spine as shown in Figure 5. The head may be steadied by an assistant who keeps out of the line of fire.

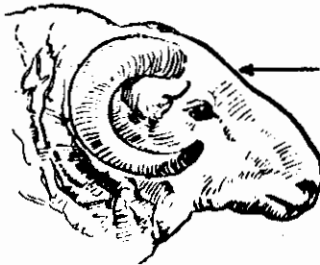


Figure 5: Recommended position and direction of fire for firearm - Horned sheep and rams.

d) Pigs

Frontal method: the captive-bolt pistol or firearm should be directed at a point about midway across the forehead and (for adult pigs) about 2 cm above the level of the eyes (Figure 6). When using a firearm, aim horizontally into the skull.



Figure 6: Humane destruction of pigs

"a" indicates recommended position for temporal method. (Suitable for firearm only).

"b" indicates recommended position for frontal method. (Suitable for firearm or captive-bolt pistol).

Temporal method: suitable only for firearms. The pig is shot from the side of the head so that the bullet enters the skull at a point midway between the eye and the base of the ear on the same side of the head. The bullet should be directed horizontally into the skull. This method is preferred for adult pigs due to the heavier bone structure of the front of the skull.

e) Goats

Using either a captive-bolt pistol or firearm, direct the instrument to the skull behind the horns as shown by the point of the arrow in Figure 7. Aim the firearm in line with animal's mouth, and take care that no-one is in the line of fire.

Kids may also be shot from the front as for cattle (see page 21 ), however this method is not suitable for mature goats as the brain is located well back in the skull compared to other livestock.



Figure 7: Recommended position and direction of fire for captive-bolt pistol or firearm - Goats.

f) Deer

A firearm or captive-bolt pistol should be directed at the forehead where lines taken from the base of each ear to the opposite eye intersect. A firearm should be fired horizontally into the forehead.

If the deer are disturbed when approached from the front, an equally effective method is to fire the instrument through the skull just behind the base of the antlers. A firearm should be aimed in line with the animal's muzzle (Figure 8).



Figure 8: Recommended positions and direction of fire for captive-bolt pistol or firearm - Deer

#### 4. BLEEDING-OUT OF SHEEP AND GOATS WITHOUT PRE-STUNNING

Bleeding-out of sheep and goats only without pre-stunning is a humane alternative method of slaughter provided it is done by a skilled person using a suitable, sharp knife.

The animal should be laid on its side and the head drawn back. The neck is quickly cut transversely completely through to the spine just behind the jaw bone. In addition, the skilled operator may dislocate the neck by lifting the muzzle and quickly making a downward thrust on the back of the head.

This method is not suitable for calves because an additional blood supply to the brain enables the animal to remain conscious for a considerable time after the throat is cut.