



CATTLE COUNCIL OF AUSTRALIA

15 April 2021

Lisa Crowle
Principal Policy Officer
Animal Biosecurity and Welfare Program
Biosecurity Queensland
Department of Agriculture and Fisheries

Dear Ms Crowle

Re: Proposed changes to national Animal Welfare Standards and Guidelines for Land Transport of Horses

Cattle Council of Australia (CCA) is the peak industry organisation representing Australia's grass-fed cattle producers. Established in 1979, CCA brings together all state-based farming organisations (SFOs) representing cattle producers in their jurisdiction, associate member organisations with close connections to the cattle industry, and individual cattle producers.

CCA welcomes the opportunity to provide comment on the proposed changes to national Animal Welfare Standards and Guidelines for Land Transport of Horses (S&Gs). We provide this submission without prejudice to any additional submission from our members or individual producers.

CCA acknowledges the regulation of animal welfare is a matter for jurisdictional governments, and therefore appreciates the steps being taken by the Queensland Government to consult widely with industry.

CCA also acknowledges the genesis of the review of the S&Gs as a recommendation arising from the Martin Inquiry into animal cruelty in the management of retired Thoroughbred and Standardbred horses in Queensland.

While CCA is the only recognised body representing the grass-fed cattle industry at the national level, many of our producer members own and transport horses for working and recreational purposes and may be impacted by the proposed amendments to the S&Gs. Australian cattle producers depend on the good health and welfare of their animals, including their working dogs and horses. We also see the importance of presenting a national view on welfare matters potentially affecting other livestock sectors in the future.

CCA endorses the detailed responses the submission from our Queensland SFO member, AgForce. Policy staff within AgForce consulted with CCA during the drafting of their submission, and both organisations agreed in the formation of AgForce's position.

This submission does not seek to duplicate the information contained in the AgForce submission, but emphasises the following points:

Do you disagree with any of the proposed standards or guidelines? Why?

- *Providing water and rest during the journey*

During a journey of at least 4 hours but less than 8 hours, a horse is to be provided with either continuous access to water or a 30-minute water stop every 4 hours. The water stop may be provided without unloading the horse from the vehicle.

Most horse transport vehicles are not equipped to supply continuous access to water, nor have drainage designed to accommodate this requirement. It is suggested that a regulatory impact statement would be required to properly address this matter. Providing constant access to water risks vehicle floors becoming wet and slippery with potential to cause slips and falls.

Many horses are transported by commercial horse transport vehicles, regulated by heavy vehicle fatigue management regulations. The National Heavy Vehicle Regulator provides a framework encompassing transport vehicles over 4.5 tonnes travelling further than 100km from the driver's base. The proposed standard should be amended to align rest stops for horses with driver fatigue management stops, meaning a stop of 30 minutes every 8 hours should be provided where horses are unloaded and offered feed and water with provisions for horses to be offered feed and water without unloading when required (i.e. unmanaged horses, horses in airconditioned transports, unsuitable rest area for unloading).

A new guideline should recommend the use of on-board watering systems.

It is unknown whether on-board watering systems will assist in decreasing dehydration of stock. Equally, there is little evidence to support the assumption that a horse will drink in transit, and therefore it is unknown if the proposed guideline will result in positive welfare outcomes. As such, any amendments to standards should focus on horses being offered water in transit at an agreeable point in time rather than continuously.

- ***Prevention of heat stress***

New guidelines are proposed that recommend that horses are transported at night during very hot weather.

The proposed guideline does not consider driver fatigue management, with the operation of heavy vehicles at night posing potential human and animal welfare risks through fatigue or road crash incidents. Additionally, the guideline is also impractical for working horses that may be moved between locations for work (e.g. mustering), or for horses being transported to competitions with specified arrival times.

- ***Space allowance – loading density and clearance***

A new guideline is proposed to recommend that horses travel in a backward facing position. Research has shown that this is likely to reduce stress.

Research has shown that horses traveling unrestrained in an open box truck may choose to travel in the backward facing position. However, not facing backwards does not cause pain or distress to horses. Most horse transport vehicles are not designed to allow the horse to choose their direction of travel but are instead designed with horse and handler safety and load configuration in mind. This guideline would apply in so few circumstances that it should be deleted.

What is the financial impact of the proposals? Can you provide examples and estimated costs?

The inclusion of on-board water systems would incur financial impact for all horse owners with transport that is not fitted with such a system. Depending upon the specific system requirements, the costs incurred may include modifications to existing transport vehicles, or investment in newly manufactured transport vehicles.

What is the administrative impact of the proposals? Can you provide examples and details of time/effort added or saved?

The administrative impacts of the proposal would include additional time taken for breaks and providing livestock with water; additional logistical work to ensure that breaks taken along stock routes comply with biosecurity considerations such as cattle tick and interstate movement requirements; and additional systems to be implemented to comply with record keeping requirements for the provision of water.

What information, education or resources would be needed to support industry to put the changes in practice?

Support for the industry includes an education and awareness program to articulate changes and provide guidance on how an individual can meet their animal welfare obligations through compliance with the standards.

CCA appreciates the opportunity to provide comment to the initial call for feedback and looks forward to making additional comment in the future if warranted.

Please do not hesitate to contact the CCA office on 1300 653 038, or at cca@cattlecouncil.com.au if you would like to discuss this further.

Yours sincerely

Travis Tobin
Chief Executive Officer