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Dear Fiona

**Animal Welfare (Transport of Livestock) Regulations - proposed changes**

Thank you for the opportunity to provide feedback on the proposed changes to Tasmania's *Animal Welfare (Transport of Livestock) Regulations* as described in the Discussion Paper provided to us by email on 24 January 2025.

The RSPCA is Australia's most trusted animal welfare charity. We have worked alongside government and policy makers for many years to improve animal welfare in Australia through contemporary animal welfare science.

We have taken note of the Consultation Regulation Impact Statement informing the development of land transport standards for horses, and we are aware of the bobby calf standards. Please find below RSPCA Tasmania and RSPCA Australia's joint submission to the questions in the Discussion Paper relating to the proposed changes to the Tasmanian regulations.

We look forward to continuing to be consulted on animal welfare matters and providing feedback on the updated discussion paper when it is released for public comment.

Kind regards

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Animal Welfare (Transport of Livestock) Regulations – Proposed changes (Discussion Paper)

# RSPCA Tasmania / RSPCA Australia joint submission

Please find below our response to the questions posed in sections 2, 3 and 4 of the Discussion Paper.

## 2. Horse transport regulations

### 2.1 Time in transport, spell time and time off water

*Proposal:*
*Reduce the time that horses spend in transport and adjust spell time between journeys for different horse classes.* (see Table 1 and Table 2 below)
*Replace the requirement of "time off water" with "maximum journey time" and adopt additional requirements to offer horses feed and water at the latest opportunity before a journey, and at the first opportunity after a journey.*

Table 1: Current regulations

| Class | Max travel time (hrs) | Time off water (hrs) | Spell time (hrs) |
|---|---|---|---|
| Foal (<6 mths) | 12 | 12 | 12 |
| Lactating mare + foal | 12 | 12 | 12 |
| Mare 30 wks (7.5 months) - 43 wks (10.75 months) pregnant | 12 | 12 | 12 |
| Mare 43+ wks (more than 10.75 months) pregnant | 4 | 4 | 24 |
| Any other horse above 6 months old | 24 | 24 | 12 |

Table 2: Proposed changes to regulations

| Class | Max travel time (hrs) | Spell time (hrs) |
|---|---|---|
| <6 mth | 8 | 12 |
| >6 mth | 12 | 8 |
| Orphan foals 1-4 weeks old | 4 | 4 |
| Orphan foals less than 1 week old | Veterinary advice must be obtained before travel. | |
| Lactating mare | 8 | 12 |
| Mares known to be more than 7.5 months pregnant, excluding the last four weeks | 8 | 12 |
| Mares in the last 4 weeks of pregnancy | 4 | 12 |

**Question 1: What are your views about the proposed changes to the maximum travel time requirements?**

RSPCA supports the proposed changes to the maximum travel time for most classes however, we believe the following should also be considered:

- *travel time for orphan foals*: regardless of age, veterinary advice must be obtained before travel and, where travel is advised, the floor of the transport vehicle must be covered in thick bedding and have room to lie down. There is no maximum travel time indicated for orphan foals <1 week old. EFSA 2022 consider new-born foals (defined as "navel not healed: moist; fluid dripping from end; redness and swelling") to be not fit for transport. A maximum travel time, e.g. 4 hours, should be included for orphan foals <1 week old.
- *mares in the last 4 weeks of pregnancy*: veterinary advice must be obtained before travel and, where travel is advised, the spell time should be 24hrs as per current regulations
- *lactating mares*: if transported within 7 days of foaling, veterinary advice must be obtained before travel and, where travel is advised, the floor of the transport vehicle must be covered in thick absorbent bedding and have room to lie down (see GB8.5 in the land transport standards)
- *old(er) horses*: the regulations should specify conditions of transport for older horses, e.g. those ≥20 years of age, and require that veterinary advice be obtained before travel is undertaken.

The current regulations (SB8.3 in the land transport standards) allow journey time to be extended to 36 hours. RSPCA has always opposed this. With the proposed changes, our understanding is that this is no longer possible (given the proposed maximum travel times and associated spell times) and even under the conditions for travel across Bass Strait (see 2.2 below) the intent would be to ensure journey times are limited. This should be clarified.

### 2.2 Bass Strait crossings

*Proposal:*
*Extend the 'maximum travel times' for horses travelling across Bass Strait with the provision that they are either offered feed and water for the duration of the journey, or fed and watered before and after the journey, and are provided with a spell no more than four hours after disembarking.*

**Question 2: What are your views on the 'maximum travel times' for horses travelling across Bass Strait with the provision that they are offered feed and water for the duration of the journey, or fed, and watered before and after the journey, and are provided with a spell no more than two hours after disembarking from the ship?**

The proposed standard SB8.3 (Appendix 1 in the consultation RIS) requires 'adequate provision' for feeding/watering during the journey but does not state specifically that feed/water must be provided during the journey. If the journey across Bass Strait typically lasts 12 hours (as mentioned in the consultation RIS), and a spell is required within 2 hours of disembarking, even if horses were given feed/water just prior to loading, this would still equate to more than 14 hours without feed or water. Horses should have access to feed/water during the journey across Bass Strait.

### 2.3 Lameness

*Proposal:*
*Introduce the use of a grading scale to define the level of lameness of a horse and its fitness for transportation.*

**Question 3: Do you think it would be useful to introduce a grading scale as a measure of determining the lameness of a horse at the walk and its fitness for transportation?**

RSPCA supports the inclusion of the lameness scoring assessment and the elevation of what was formerly a guideline (GB8.7) in the land transport standards. The term 'weight shifting' should be

included in the examples for lameness scores 1 and 2 as this action suggests pain and should be investigated prior to transport or result in disqualification to be transported. It should be noted that SA4.1 in the land transport standard's fit to load criteria requires weight-bearing on all legs.

The current Regulations (Part 2, section 8) state that a horse is unfit to undertake a journey: "...in the case of a horse, has obvious lameness resulting in – (A) marked nodding, hitching or shortened stride; or (B) minimal weight bearing in motion or at rest; or (C) an inability to move...". The proposed change provides context thereby assisting regulators to better conduct lameness assessment on horses.

### 2.4 Body condition

*Proposal:*
*Implement a body condition scale for defining the body condition of a horse and its fitness for transportation.*

**Question 4: What are your views on introducing a body condition scale as a measure of determining the body condition of a horse and its fitness for transportation?**

RSPCA supports the inclusion of a body condition scale and the elevation to a standard of what was formerly a guideline (GB8.6) in the land transport standards. Where travel advice has been obtained from a veterinarian, regulations should require that the floor of the transport vehicle be covered in thick absorbent bedding and have room for the horse(s) to lie down.

### 2.5 Foal with unhealed umbilical cord

*Proposal:*
*Introduce a regulation prohibiting the transportation of foals with unhealed umbilical cords without the written approval from a veterinarian.*

**Question 5: Do you support prohibiting the transportation of foals with unhealed umbilical cords without the written approval and advice from a veterinarian?**

RSPCA supports the inclusion of this proposed regulation. In addition, where travel advice has been obtained from a veterinarian, regulations should require that the floor of the transport vehicle be covered in thick absorbent bedding and have room for the foal to lie down.

### 2.6 Stall specifications and segregation

*Proposal:*
*Requirements regarding stall specifications and segregation in transport remain largely unchanged with the addition of minor detail regarding flooring and wall structure.*
*An additional requirement to have the hind shoes removed from horses that are transported unsegregated is to be added.*

**Question 6: What are your views on introducing additional detail regarding flooring and wall structure in relation to horse stalls used in transport?**

RSPCA supports the inclusion of a "low-dust absorbent bedding" option and "walls of sufficient strength to support horse activity".

**Question 7: Do you support the proposed requirement to have the hind shoes removed from horses that are transported unsegregated to a saleyard or slaughter establishment?**

RSPCA partially supports this requirement, but we are concerned that the requirement is dictated by the destination of the horses rather than being based on the risk of horses kicking each other (e.g. unfamiliar horses travelling in groups with no partitions). We suggest the requirement be amended accordingly.

### 2.7 Extreme weather and heat stress

*Proposal:*
*Strengthen the wording of regulations that dictate the management of protecting horses from the extremes of weather while in transport.*
*Introduction of a new regulation addressing the mitigation of heat stress on horses in transport and the responsibility of taking corrective actions if heat stress occurs.*

**Question 8: Do you agree with changing the wording regarding the management of protecting horses from the extremes of weather while in transport to 'appropriate action' and 'corrective action at the first reasonable opportunity'?**

RSPCA supports the changed wording (SB8.17 A person who transports horses must take appropriate action to manage welfare risks associated with extremes of weather during all stages of transport). RSPCA appreciates the detail in guidelines GB8.30-GB8.36 (Appendix 1 in the consultation RIS), however, if heat stress has proven to be a significant welfare concern in horse transport, then it would seem prudent to include these guidelines in the regulations. GB8.30-GB8.33 (Appendix 1 in the consultation RIS) provide clear and sound advice to consignors/transporters.

GB8.35 (Appendix 1 in the consultation RIS), for example, should be a standard/regulation that requires all vehicles to have effective airflow to maintain/promote horse comfort. Enclosed vehicles should have effective mechanical ventilation to maintain horse comfort throughout the journey. Natural airflow through vents, particularly when the vehicle is stationary, is insufficient to mitigate the risk of heat stress. The additional reference to 'horse comfort' assists with explaining the intent of the proposed standard.

Similarly, for GB8.36 (Appendix 1 in the consultation RIS), should be a standard/regulation to ensure enclosed transport vehicles have fully operational ventilation systems that ensure horse comfort throughout the journey. Inspection of their operation should be in line with inspection requirements outlined in SA5.14 in the land transport standards, i.e., before departure, within the first hour of transport, and then every three hours. Alarms or monitoring systems are vital to alerting the driver to problems with the ventilation system, particularly in between designated inspection times.

**Question 9: What are your views on introducing a new regulation specifically addressing the mitigation of heat stress on horses in transport and the responsibility of taking corrective actions if heat stress occurs?**

RSPCA supports the introduction of this new regulation (SB8.18 A person who transports horses must take corrective action at the first reasonable opportunity where a horse is observed to be suffering from heat stress) (Appendix 1 in the consultation RIS).

See comment at question 8 above.

### 2.8 Multideck vehicles

*Proposal:*
*Permit the use of only the lower deck of multi-deck vehicles on the provision that all space allowance and clearance standards are met.*

RSPCA supports this proposed regulation.

### 2.9 Written records

*Proposal:*
*Extend the need for written records of transport details from only journeys that exceed 24 hours travel time, to journeys of four or more hours. Reduce details required to simply "start and end time of journey" and "last access to water, rest and feed".*
*Require that these records are to be kept for a minimum of six months and must be provided on request by an authorised officer.*

**Question 11: What are your views on changing the need for written records of transportation from only journeys that exceed 24 hours travel time to any journey of 4 or more hours, and reducing the details required to "start and end time of journey" and "last access to water, rest and feed"?**

RSPCA supports the proposed regulation that requires written records. However, we would suggest that records be required for all journeys regardless of time travelled. We strongly urge the inclusion of details of any welfare concerns and actions taken, as well as contact details in the event of an emergency, as this is important information that will help expediate the time taken to address any compromise in horse welfare that could arise during the journey. To ensure that the information recorded is usable when advising the courts, the regulation should require that the written records be 'clear and legible'.

## 3. Bobby calf transport regulations

### 3.1 Time off feed

*Proposal:*
*Introduce a requirement to feed within 6 hours of transport, a maximum of 18 hours for time off feed for bobby calves 5-30 days of age.*

**Question 12: What are your views on introducing a requirement to feed within six hours of transport, a maximum of 18 hours for time off feed for bobby calves 5-30 days of age?**

RSPCA is of the view that bobby calves are too young to cope with the length of transport and time off feed currently permitted under legislation, with older calves better able to withstand the stressors of transport which include loading and unloading and mixing with unfamiliar animals in unfamiliar environments.

Bobby calves have underdeveloped "following" behaviour. In their first week of life, calves are in a 'hider' phase and spend most of their time sleeping. This can make moving and loading and

unloading during transport difficult for handlers and stressful for calves. Calves 8-10 days old are more responsive than younger calves however herding behaviour is not thought to be fully developed until calves are around 20 days old.

Transport, particularly loading and unloading, is stressful and results in typical physiological stress responses including increased heart rate and reduced immune system responsiveness. Young animals in general, including calves, are typically more at risk of transport-related physical complications than more mature animals because they are vulnerable to energy depletion and have immature immune systems. Calves are often transported during an 'immune gap' when many maternal antibodies have dissipated, and their own immune system is still developing. For example, maternal immunoglobulin M (IgM) and immunoglobulin A (IgA) are typically lost before 5 days of age, while significant production of the calf's own IgM begins between 8 and 16 days of age and IgA around 2 months of age.

Calf thermoregulatory system and gastrointestinal tracts are also still developing therefore immature animals may struggle to meet transport-related challenges that affect these systems such as poor weather conditions and time off feed. Plasma creatine kinase (CK), a physiological measure of physical exertion and/or bruising, increases as the transport journey increases. Both live weight of calves and plasma CK may take up to 7 days to recover after transport. To ensure that calves are not hungry and using energy reserves during the transport process, total time off feed should not exceed 12 hours. Young calves are susceptible to cold and heat stress as they are not yet able to control their body temperature. Calves are at an increased risk of morbidity and mortality during transport. For example, calves (defined as <275kg body weight) have been found to have a higher risk of being non-ambulatory or dying during transport compared to feeder and finished cattle ≥275kg. EFSA 2022 conclude that calves should be at least 5 weeks of age and weigh at least 50kg when transported, and be fed at least every 12 hours.

Young calves, particularly smaller calves, prefer to lie down during transport (up to 70% of the journey time) and may become fatigued and/or bruised through lack of comfortable bedding and/or opportunity to get up or lie down unhindered due to a lack of space. If provided with straw bedding, they will lie down longer. Providing straw bedding also reduces fatigue in calves compared to mesh flooring which is uncomfortable to lie on.

In 2022, the Australian Dairy Farmers Surplus Calves Taskforce recommended that "by 2035 all dairy calves are able to enter a valued market chain". In the UK, the dairy industry committed to rearing all calves with care and eliminating the practice of on-farm killing of healthy calves by 2023. These goals show that the dairy industry both in Australia and internationally is moving away from early life killing of 'surplus' dairy calves.

The 2022 Dairy Australia Animal Husbandry & Genetics Survey found that 65% of dairy farms surveyed fed calves within 1-2 hours of them leaving the farm and that 62% of Tasmanian dairy farmers fed calves twice a day (although the sample size was small and it is unclear whether this relates to replacement calves or bobby calves, or both).

The location of dairy farms in Tasmania in relation to Cressy and travel to the abattoir (e.g., from Smithton (NW TAS) to Cressy is under 3 hours; from Pyengana (NE TAS) to Cressy is under 2.5 hours; and Geeveston (S TAS) is around 3 hours) and any additional time where transporters may pick up calves from different farms and/or collection points, should allow transport from farm to abattoir to be conducted within 6 hours. If time off feed should not exceed 12 hours to prevent calves experiencing hunger and depleting energy reserves, then slaughter should occur within 12 hours of last feed.

This is an opportunity for the Tasmanian government to improve the welfare of bobby calves and align with industry trends and community expectations regarding early life killing of calves that are too often seen as a waste product of dairy farming. As such, the regulations should phase in a requirement that bobby calves not be consigned to slaughter. Until such time, bobby calves destined for slaughter should be transported under similar conditions to calves transported to a rearing facility, i.e.:

- fed a liquid feed within 6 hours before loading (covered in this proposal 3.1)
- provided thick bedding (≥15cm depth) and room for all calves to lie down at the same time
- protected from cold and heat (covered in proposal 3.3)
- not consigned through saleyards
- slaughtered within 12 hours of last feed
- have an auditable record identifying when the calf was last fed (covered in proposal 3.3).

### 3.2 Time in transport

*Proposal:*
*Introduce a maximum of 6 hours in transport for calves under 5 days old.*
*Introduce a maximum of 12 hours in transport for calves 5 to 30 days old.*

**Question 13: Do you support introducing a maximum of 6 hours in transport for calves under 5 days old to a rearing facility only?**

RSPCA supports the adoption of this requirement in the regulation. It should be made clear that calves under 5 days old transported to a rearing facility must also be fed a liquid feed within six hours before loading.

**Question 14: What are your views on introducing a maximum of 12 hours in transport for calves 5 to 30 days old?**

See comment at 3.1 above.

### 3.3 Other requirements proposed for bobby calves

*Proposal:*
*Introduce the following regulations for bobby calves:*
*A person in charge of transporting a bobby calf less than five days old must ensure the calf:*
*i) is provided with thick bedding and room to lie down; and*
*ii) is protected from cold and heat; and*
*iii) is not be consigned through saleyards.*
*A person in charge of a bobby calf between five and 30 days old which is being transported must ensure the calf:*
*i) is in good health, alert and able to rise from a lying position; and*
*ii) is protected from cold and heat; and*
*iii) has an auditable and accessible record system that identifies the calf was last fed within six hours of loading, unless the journey is between rearing properties and is less than six hours duration.*
*A person consigning a premature calf must ensure the calf is as fit for the journey as a normal, full-term calf.*
*A person transporting bobby calves under 30 days old must ensure all calves have sufficient space in the livestock crate to lie down on their sternums.*

*A person must not use a dog to move a bobby calf during the transport process.*
*A person must not use an electric prodder on a calf under three months of age.*

**Question 15: What are your views on the additional requirements for bobby calves?**

RSPCA supports the additional requirements for bobby calves.
See comment at 3.1 above re conditions for bobby calf transport.
RSPCA is opposed to the use of electric prodders regardless of age.

## 4. Any other issues

**Question 16: Do you have any other suggestions in relation to livestock transport legislation in Tasmania?**

*Humane destruction*
Throughout the land transport standards and the Regulations, reference is made to humanely 'destroying' or humane 'destruction' of animals. Animals are sentient beings, not objects to be 'destroyed'. In the context of an animal welfare standard (or regulation), this should be recognised and this wording was updated to 'humane killing' in subsequent standards (e.g., saleyards, cattle, and sheep). The term 'euthanasia' is appropriate when the animal is suffering, and it is in the interest of the animal's welfare to end their life. However, it is recognised that this term is not always understood by industry (e.g., transporters believing that euthanasia requires a vet to be involved) and therefore 'humane killing' was introduced as an alternative and to convey the intended process and outcome of ending an animal's life humanely, i.e., that it is conducted in a manner that prevents/minimises pain, suffering and distress.

*Blunt force trauma*
The land transport standards (SA6.5) allow a person to kill a calf <24 hours of age using blunt force trauma to the forehead. The Tasmanian regulations should explicitly prohibit this method of killing. As stated in AVMA 2023: "The anatomic features of neonatal calves make manually applied blunt force trauma to the head unacceptable as a method of euthanasia for this species.". Tasmanian farmers should be supported in the use of firearm or captive bolt for on-farm killing of neonatal calves (see e.g. Dairy Australia 'Euthanase livestock' training module).

*Review of land transport standards & guidelines*
The *Animal Welfare Standards and Guidelines – Land Transport of Livestock* were endorsed in September 2012. They are overdue for review.

*Monitoring, compliance and reporting*
Strengthening the capacity to proactively inspect transporters and supply chain participants and assess compliance with legislation.
Public reporting of transport outcomes, including fitness to load, number and class of animal transported, destination, time travelled, time off water/feed, etc.

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## SUBMISSION ENDS