



25 February 2020

Department of Primary Industries
and Regional Development
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South Perth WA 6151
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To The Department of Primary Industries and Regional Development

Submission for the Animal Welfare (Livestock) Regulations 2019

Thank you for the opportunity to comment on the proposed Animal Welfare (Livestock) Regulations 2019.

The proposed Regulations must clearly inform the livestock industry of its responsibilities towards the welfare of animals.

Therefore, the proposed Regulations must be easily understood by anyone without the need for specialised veterinary knowledge. If not, the proposed Regulations will fail to ensure that duty of care obligations are being adhered to and minimum standards of welfare are being met.

Specific clauses of the draft regulations:

- **Clause 9. Unfit to undertake a journey** (1) A livestock animal is unfit to undertake a journey if any of the following apply to the animal — (a) it is unable to walk independently by bearing weight on all hooves;

Clause 9, as described above, does not make clear whether animals who cannot bear weight on all hooves evenly, are to be excluded from transport. An animal may be able to walk by bearing some weight on one or more hooves, but that does not mean the animal is not suffering from a painful condition. The document *Is the animal fit to load? : A national guide to the pre-transport selection and management of livestock (revised edition 2019)* states on page 22 that an animal with the following conditions, is unfit for transport:

- foot abscess
- recent injury
- an old injury or deformity
- old fracture
- is knuckling over

The above mentioned Guide states that bunny hopping and knuckling over, head bobbing, carrying one leg when standing or walking and reluctance to stand and walk as indicators of lameness.

If Clause 9(1)(a) in its current draft form is legislated, animals may be deemed fit to transport despite having any one of the above conditions.

Therefore, to be consistent with the above mentioned Guide there should be a defining provision inserted into Clause 11(1) that recognises lameness and clearly refers to *Is the animal fit to load? : A national guide to the pre-transport selection and management of livestock (revised edition 2019)*. This will provide clear guidance to those people making assessments of animals and help ensure that animals with painful conditions preventing them from bearing their weight fully are not transported.

It needs to be understood that animals may at times bear weight even when they are suffering greatly from painful conditions. The fact that they are able to bear weight does not mean they are fit for transport or sale.

- **Clause 11. Prescribed conditions**

(1) This clause gives a definition of a lesion. However, 11(2)(j) defines that only a lesion that is (i) discharging; and (ii) is more than 3 cm in length will be considered when assessing whether an animal can be sold or transported.

Draft clause 11(2)(j) will allow sale and transport of animals with lesions less than 2cm or if the lesion has a discharge. For example, an animal with an infection, indicated by a wound that is less than 2cm and not discharging at the time due to the fact that it has yet to burst, will be fit to load.

Deep shearing cuts, infected udders, enlarged testicles, lumpy jaw, Ovine Brucellosis, photosensitisation, scabby mouth, eye diseases or any other condition where the size of the lesion, if the lesion is present at all, is more than 3cm, but not discharging, may be considered fit for transport. This is unacceptable.

Therefore, to avoid these unfit animals being transported, Clause 11(2)(j) should be completely removed and in its place include the conditions listed in the *Is the animal fit to load? : A national guide to the pre-transport selection and management of livestock (revised edition 2019)*.

Thank you for considering my submission.

Yours faithfully,

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K. Felix