



**SUBMISSION ON THE PROPOSED AUSTRALIAN ANIMAL WELFARE
STANDARDS AND GUIDELINES FOR LIVESTOCK AT SALEYARDS AND DEPOTS
(SALEYARD WELFARE STANDARDS)**

12 December 2014

Voiceless Limited

ACN 108 494 631
2 Paddington Street
Paddington NSW 2021

P +61 2 9357 0703

F +61 2 9357 0711

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ABOUT VOICELESS

As an innovator, capacity builder and ideas-generator, Voiceless plays a leading role in the development of a cutting edge social justice movement, animal protection.

With a highly professional and well-educated team, Voiceless brings together like-minded compassionate Australians from the legal, academic, non-profit and education sectors to form strong and effective networks.

Voiceless believes in the provision of quality information, analysis and resources to inspire debate and discussion and to empower individuals and organisations to generate positive social change.

Voiceless is a non-profit Australian organisation established in May 2004 by father and daughter team Brian and Ondine Sherman.

To build and fortify the animal protection movement, Voiceless:

- gives grants to key projects which create the groundswell for social change;
- cultivates the animal law community through the provision of leadership, educational opportunities and resources; and
- raises awareness of animal protection issues within the education system in order to strengthen democratic skills, promote critical thinking and encourage advocacy amongst students.

PATRONS

J.M. COETZEE, Nobel Prize for Literature Winner 2003, author of 'Lives of Animals' and 'Elizabeth Costello'

BRIAN SHERMAN AM, businessman and philanthropist

DR JANE GOODALL, world-renowned primatologist and animal advocate

THE HON MICHAEL KIRBY AC CMG, former judge of the High Court of Australia

AMBASSADORS

HUGO WEAVING, Actor: Oranges and Sunshine, Last Ride, Little Fish, Lord of the Rings Trilogy, Matrix Trilogy, The Adventures of Priscilla Queen of the Desert

EMILY BARCLAY, Actor: Prime Mover, Piece of my Heart, Suburban Mayhem, In My Father's Den

ABBIE CORNISH, Actor: w.e., Suckerpunch, Limitless, Bright Star, Stop Loss, Elizabeth: The Golden Age, A Good Year, Somersault, Candy

For further information visit <http://www.voiceless.org.au>

All correspondence in relation to this submission should be directed to:

Mr Emmanuel Giuffre
Voiceless
2 Paddington Street
Paddington NSW 2021 AUSTRALIA
T: + 612 9357 0713
F: + 612 9357 0711
Email: emmanuel@voiceless.org.au

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1. Introduction

- 1.1 We commend the Federal Government for inviting public submissions on the proposed Australian Animal Welfare Standards & Guidelines for Livestock at Saleyards and Depots (“Saleyard Welfare Standards”).
- 1.2 In consultation with Voiceless’s Scientific Expert Advisory Council, Animals’ Angels, Stephanie Dyer and other industry experts, Voiceless’s submission addresses our principal concerns with the following documents released by the Government for public consultation:
 - 1.2.1 The Saleyard Welfare Standards: Public Consultation Version, Edition One (“S&G”);
 - 1.2.2 The Consultation Regulation Impact Statement: August 2014 (“RIS”);
 - 1.2.3 The Guide to the Consultation Regulation Impact Statement (“RIS Guide”); and
 - 1.2.4 The Discussion Paper on the proposed Saleyard Welfare Standards.
- 1.3 Part 2 of our submission responds to a number of the questions posed in the RIS; Part 3 provides our general comments on the S&G and the RIS; and Part 4 provides our detailed comments and suggested recommendations on the S&G.

2. Response to RIS Public Consultation Question

Question 2 – *Do you think the risks to the welfare of saleyard animals are sufficient to justify the introduction of better standards and/or guidelines?*

- 2.1 As indicated in the RIS, saleyards and depots pose a significant number of unique risks to the welfare of farm animals. These welfare risks include, but are not limited to:
 - 2.1.1 stress, injury or illness suffered as a result of poor design, construction, maintenance and operation of saleyards and depots;
 - 2.1.2 poorly used and/or designed ramps for loading / offloading animals for transport;
 - 2.1.3 stress, injury or illness associated with lengthy times off feed and water, including uncertainty around when an animal was last provided feed and water prior to presentation at saleyards and depots;
 - 2.1.4 post-transportation stress, illness or injury, particularly for animals subjected to lengthy durations on transport;
 - 2.1.5 effects of exposure to adverse weather conditions, including failure to provide adequate shelter to animals in saleyards and depots;
 - 2.1.6 stresses associated with such things as separation of animals from their mothers, forced exposure to unfamiliar environments, forced interaction with other animals, handling by unfamiliar stockpersons, etc;

- 2.1.7 rough handling of animals whilst loading / offloading trucks, as well as at saleyards, including the use of electric prodders and dogs on animals;
- 2.1.8 poor identification and treatment of sick and injured animals, particularly post-transport;
- 2.1.9 high stocking densities, which is particularly problematic during extreme weather conditions; and
- 2.1.10 poor assessment of animals as “fit for transport” or “fit for sale”,

among other issues, which will be discussed in detail in Section 3 and 4 of this Submission. The multitude and potential severity of these risks – as well as the significant number of animals processed through saleyards and depots daily – demand an improved set of standards that clearly stipulate the responsibilities of livestock owners, buying/selling agents, transporters and all other parties involved at saleyards and depots.

2.2 Voiceless notes the following further reasons justifying improved welfare standards for animals at saleyards and depots:

- 2.2.1 **(Failure of existing regulatory framework)** Voiceless agrees with the position stated in the RIS that the present Model Code of Practice for the Welfare of Animals: Animals at Saleyards 1989 (“MCOP”) is inadequate in addressing these risks and protecting the welfare of animals at saleyards and depots. These inadequacies are considered further in our responses to Questions 3 and 5 below.
- 2.2.2 **(The need for mandatory, enforceable legal protections)** The present regulatory framework governing animal welfare at saleyards and depots is largely voluntary and non-compliance is unenforceable. As seen in numerous animal industries, standards that rely on voluntary industry adherence have consistently proved ineffective in protecting the animal welfare.

For instance, the present MCOP has been in place since 1989, yet investigations by the relevant departments in Victoria, South Australia, Queensland, Tasmania, Western Australia and New South Wales in the past three years have all found multiple instances of unacceptable practices and poor management of livestock at saleyards.¹ This is also the experience of Animals’ Angels and other animal welfare advocates ‘on the ground’, who regularly witness breaches of the MCOP standards, animal abuse and/or failure to properly treat or care for animals at these facilities.

It is unlikely that developing a new set of voluntary standards and guidelines will result in higher levels of compliance. Mandatory and legally enforceable national protections is the only appropriate means of managing the significant risks to which animals at saleyards and depots are exposed.

¹ Guide to the *Consultation Regulation Impact Statement on the Australian Animal Welfare Standards and Guidelines – Livestock in Saleyards and Depots*, 4 September 2014, p.23-24.

- 2.2.3 **(Animal sentience)** Voiceless's work is guided by a commitment to the inherent moral worth of animals and by the extensive scientific evidence supporting animal sentience. The Federal Government has recognised that '[s]entience is the reason that welfare matters'.² Scientific studies have supported the proposition that animals feel pleasure and pain³ and live emotional lives.⁴ If it is accepted that animals are sentient beings, then there is justification in ensuring their protection from injury, pain, suffering and cruelty.
- 2.2.4 **(Public sentiment towards better protection for animals)** Australians are concerned about animal protection. In a single year from 2012 to 2013, there were 49,861 animal cruelty complaints to the RSPCA across Australia.⁵ Consumers are also becoming increasingly aware of the ethical issues behind food production. In 2013, survey research of a representative sample of Australian consumers indicated that thousands of respondents were willing to pay between 5-10% more on animal-based goods in order to bring about improved welfare standards in their production.⁶ The introduction of better welfare standards will be well received by the Australian public and animal advocates alike, and is necessary to ensure the animal welfare regulatory framework adequately reflects and is consistent with changing societal expectations.

Question 3 – *In your experience, to what extent does the existing MCOP and related regulations create uncertainty for industry? Does such uncertainty vary between different states and territories?*

Question 5 – *Do you think there needs to be national consistency in animal welfare standards for saleyards? If so, why do you think this?*

- 2.3 Voiceless agrees with the position in the RIS that the current regulatory framework produces considerable uncertainty for industry. In our view, this uncertainty arises due to the voluntariness of the current regulatory framework (as discussed in our response to Question 1) and inconsistencies across the various Australian states and territories.

² Department of Agriculture, Fisheries and Forestry, 'The Australian Animal Welfare Strategy and National Implementation Plan 2010-14', 6
<http://www.australiananimalwelfare.com.au/app/webroot/files/upload/files/aaws_implementation_plan_updated.pdf>, accessed on 1 December 2014.

³ Bernard E. Rollin, 'Animal Pain' in Susan J. Armstrong and Richard G. Botzler (eds), *The animal ethics reader* (Routledge, 2003) 86-87; Marian S. Dawkins, 'Through animal eyes: What behaviour tells us' *Applied Animal Behaviour Science* 100 (2006) 4, 7-8.

⁴ Marc Bekoff, *The Emotional Lives of Animals* (New World Library, 2007) xviii.

⁵ RSPCA Australia National Statistics 2012-2013, http://www.rspca.org.au/sites/default/files/website/The-facts/Statistics/RSPCA_Australia_National_Statistics-2012-2013.pdf.

⁶ ABC, 2013. 'Shoppers want improved farm animal welfare', *ABC Rural*, <http://www.abc.net.au/news/2013-10-07/nrn-consumer-animal-welfare/5002684>.

2.4 The move towards consistency has received strong support from primary industry bodies and the Primary Industries Ministerial Council,⁷ as well as the RSPCA.⁸ In our view, national consistency is necessary for the following reasons:

2.4.1 **(Industry compliance)** Inconsistencies impose an excessive regulatory burden on saleyard businesses operating in multiple jurisdictions due to uncertainty as to which standards apply. This uncertainty inevitably results in poor levels of compliance, and accordingly, adverse animal welfare outcomes.

2.4.2 **(Animal welfare)** The legal protections afforded to animals should not depend on the jurisdiction in which they are located. A set of national standards is essential to ensure that all Australian animals are afforded stronger legal protections.⁹ Further, national advances in animal welfare are impossible to achieve without uniformity.

2.4.3 **(Monitoring and enforcement)** – Monitoring and enforcement efforts can vary drastically across jurisdictions. A single, comprehensive set of standards that apply nationally are considerably less complex to manage than multiple sets of standards in different jurisdictions.¹⁰

2.4.4 **(Cost Savings)** – The removal of burdensome inconsistencies in welfare standards will enable improved efficiencies for industry and remove associated costs for industry, individual businesses and ultimately consumers.

Question 6 – *Do you believe that the net benefits to animal welfare likely to be achieved under Option A, are justified? Would the combination of costs and benefits under Option A be superior to other options?*

2.5 It is Voiceless's position that there will be little to no net benefit achieved under Option A. The effectiveness of Option A is highly dependent on the industry's level of voluntary compliance. While a national set of guidelines will solve the problem of uncertainty and inconsistency raised in Questions 3 and 5, the current experience with the MCOP proves that voluntary guidelines are not effective (see our response to Question 1 above).

Question 9 – *Do you believe that the net benefits to animal welfare likely to be achieved under variations C1 or C2 of Option C, are justified? Would the combination of costs and benefits under variations C1 or C2 of Option C be superior to other options?*

2.6 Voiceless endorses Option C (Variation C1) which proposes a maximum 24 hours of time-off-feed for animals at saleyards.

⁷ Australian Animal Welfare Strategy, 2014. 'Consistency the key – animal welfare law', <http://www.australiananimalwelfare.com.au/content/consistency-the-key-animal-welfare-law>.

⁸ RSPCA, 2012. Position paper H1 on Animal Welfare Legislation, revised 7 January 2012, <http://kb.rspca.org.au/afile/503/88/>.

⁹ White, S., 2007. 'Regulation of Animal Welfare in Australia and the Emergent Commonwealth', *Federal Law Review*, 35(3):347-374.

¹⁰ White, S., 2007. 'Regulation of Animal Welfare in Australia and the Emergent Commonwealth', *Federal Law Review*, 35(3):347-374.

2.7 The RIS states that there is a ‘generally accepted 48hr threshold for welfare in relation to feed’.¹¹ With respect, Voiceless does not support this view. It is the position of various animal welfare groups and veterinary experts, including Voiceless, that animals should not be deprived of feed for a period longer than 24 hours.

2.8 The RSPCA supports the limit of 24 hours for animals over 6 months old and a maximum of 12 hours off feed for animals who are pregnant, lactating or less than 6 months old.¹² This position is supported by veterinary experts, who recommend feed and water deprivation for no longer than 24 hours due to the rapid loss of live weight and rumen content experienced by cattle in the first 12 hours without feed and water.¹³

2.9 Phillips et al note that there is a lack of robust science relating to the impacts of feed and water deprivation on different species and classes of livestock. However, they note that deprivation of feed and water for 1 day:

*“Appears to provide an environment in the gastrointestinal tract that promotes the survival, and even enhances the proliferation, of pathogens such as Salmonella spp. and E. coli. A combination of these pathogens and other stress responses may negatively impact on immunocompetence, and trigger disease, such as shipping fever”.*¹⁴

2.10 Philips et al note further that certain species and classes may tolerate feed and water deprivation, however, stock with low digesta loads are likely to be particularly susceptible to feed and water deprivation. This includes young animals, stock that are first subjected to feed and water deprivation early in the morning and undernourished stock, and possibly animals that have been selected for rapid growth rates and high feed efficiency. The authors acknowledge, however, that few comparative studies have been conducted in this area.¹⁵

2.11 Philips et al put forward the following recommendations:

*“Based on the potential for enteropathogen growth and the potential for an increase in stress to the animal, it appears prudent to ensure that total time off feed and/or water does not exceed 24h.”*¹⁶

2.12 Philips et al conclude that:

*“Given the limited scientific literature in relation to the impact of FWD [feed and water deprivation] and the potential for major human and animal health and welfare impacts, further research should be undertaken with a high priority.”*¹⁷

¹¹ Guide to the Consultation Regulation Impact Statement on the Australian Animal Welfare Standards and Guidelines – Livestock in Saleyards and Depots, 4 September 2014, p.63.

¹² RSPCA, *Position paper B6 – Welfare of farm animals at saleyards*, (29th July 2011) www.rspca.org.au, [5.2]

¹³ James P. Hogan, J. Carrol Petherik and Clive J.C. Phillips, ‘The physiological and metabolic impacts on sheep and cattle of feed and water deprivation before and during transport’ (2007) *Nutrition Research Reviews* 20, 18-19 and 25.

¹⁴ *Ibid*, 25.

¹⁵ *Ibid*.

¹⁶ *Ibid*.

- 2.13 Furthermore, adopting Option C (Variation C1) would bring Australia's welfare standards in line with other developed countries. For example, The Welfare of Animals at Markets Order 1990 (England) mandates that animals in markets must be provided with feed and water at least once every 12 hours.¹⁸ New Zealand also recommends maximum periods of feed deprivation of 24 hours for mature animals and preferably 8 hours for young animals.¹⁹ As a country who claims to be a world leader in animal welfare,²⁰ Australian animals should not be subjected to lower standards of welfare than our neighbours.
- 2.14 In consideration of Option C (Variation C2), Voiceless agrees with the point made by veterinary researchers and scientists to the New Zealand Ministry of Agriculture and Forestry that longer periods off feed increases welfare risks and brings little additional benefit for effluent management during transport and processing of livestock.²¹
- 2.15 Balancing the welfare implications of extended time off feed with the potential costs involved, it is Voiceless's position that Option C (Variation C1) would provide the greatest net benefit for animals. It is important to note that it is virtually impossible for saleyard and depot operators to know when an animal was last provided with feed. Requiring animals to be fed within 24 hours will ensure that animals are either fed at saleyards / depots if they remain in those facilities for an extended period of time, or will incentivise facilities to process animals as quickly as possible.
- 2.16 To be effective, a 24 hour time off feed limit will also need to be implemented with a feed and water deprivation (FWD) register, as discussed below in section 3.4 of this Submission.

3. General comment

- 3.1 Voiceless has reviewed the S&G and note the following comments / concerns which we recommend need to be addressed in future revisions:

Provision of water at saleyards

- 3.2 The provision of clean water is essential for animal welfare. This is particularly important to offset the risk of dehydration from extreme heat exposure and high stocking densities. As with feed deprivation (discussed above), these concerns are exacerbated by the inability for saleyard or depot operators to ascertain the last point at which animals were provided with water. Accordingly, Voiceless strongly recommends a requirement for all saleyards and depots to provide clean watering facilities in all pens and yards, accessible to all animals within the pen or yard. This position is supported by the RSPCA²² and a number of other animal protection groups, including Animals' Angels. Katanning saleyard – one of the biggest

¹⁷ Ibid.

¹⁸ *The Welfare of Animals At Markets Order 1990* (England) s11(2).

¹⁹ *Code of Recommendations and Minimum Standards for the Welfare of Animals of Saleyards* (New Zealand).

²⁰ The Australia Department of Agriculture, 2014, 'Animal and Plant Health Home', last reviewed 24 November 2014, < <http://www.agriculture.gov.au/animal-plant-health> >.

²¹ MW Fisher, PD Muir and NG Gregory, 'The animal welfare implications of depriving sheep of feed to facilitate transport and slaughter' (2011) *MAF Technical Paper No 2011/37*, 23.

²² RSPCA, *Position paper B6 – Welfare of farm animals at saleyards*, (29th July 2011) www.rspca.org.au, [5.1]

saleyards in Western Australia – currently has water facilities in every pen, yard, arrival and loading out and sale pens, indicating that it is practicable for such facilities to be adopted nationally.

- 3.3 Animals' Angels and animal protection advocates who have spent considerable time 'on the ground' note excessively high stocking densities to be a significant issue across all saleyards and depots, preventing animals from accessing water, preventing movement (particularly significant in hotter climates), and potentially resulting in smothering of animals in pens (particularly problematic for sheep). The additional requirement that all animals within a pen are 'capable of accessing water' will help to avoid concerns around stocking densities by providing an objective standard for assessing when a pen is over-stocked (i.e., when an animal is incapable of accessing water).

Feed and Water Deprivation (FWD) Register

- 3.4 As indicated previously, it is virtually impossible for persons in charge to know when animals were last provided with feed and water. Accordingly, Voiceless strongly recommends that a formal declaration of the date, time and duration that livestock delivered last had access to water and feed must be provided for each consignment. This register would need to be maintained at saleyards / depots, and would need to be filled out by all operators working in, and individuals responsible for the transport of, livestock to saleyards / depots. Voiceless is of the view that an FWD Register is necessary, particularly if water is not provided to animals in each pen at saleyards and depots, although we see benefit in an FWD Register even where clean water facilities are provided in each pen or yard. In our view, the minimal cost and time involved in developing this FWD Register will be significantly outweighed by the animal welfare benefits achieved through its implementation. An FWD Register could be developed in conjunction with the Animal Welfare Incident System (AWIS) or similar animal welfare register, which Voiceless also recommends should be made mandatory in all saleyards and depots.

Animal Welfare Officer

- 3.5 Voiceless strongly recommends the appointment of an Animal Welfare Officer (AWO) at all saleyards and depots, which is currently expressed as a non-mandatory Guideline in the S&G. The appointment of an appropriately trained and qualified AWO is essential to ensuring the welfare of animals at saleyards. The AWO could be responsible for, amongst other things, maintaining the AWIS or animal welfare register (including the FWD Register), assessing whether animals are 'fit for transport' or 'fit for sale', and implementing training and development programs for all saleyard /depot employees. While the appointment would transfer a level of responsibility for welfare management away from the yard administrator (who may be too busy to focus on welfare matters), it would not operate to absolve all other saleyard / depot personnel from animal welfare responsibility. Instead, the appointment would send a clear statement that welfare is an important factor that warrants the role of a dedicated / authorised animal welfare expert. Again, the relatively low cost in implementing this position would be outweighed by the significant benefit such a role would have on improving animal welfare standards.

Provision of adequate shelter, protection from extreme weather conditions

- 3.6 All animals are susceptible to extreme weather conditions, particularly young/unweaned animals, pigs, pregnant animals and sheep. Heat stress is also a common cause of illness and mortality post-transport and whilst animals are held at saleyards and depots, concerns that are exacerbated by high stocking densities. Accordingly, Voiceless strongly recommends saleyards and depots must be required to provide a roofed area for all animals, which includes shade and/or cooling systems in hot climates and shelter/protection from excessive cold in holding facilities.

Extreme weather conditions

- 3.7 In addition to the provision of adequate shelter at saleyards and depots, Voiceless strongly recommends that animals not be consigned to these facilities in extreme weather conditions, such as extreme heat or cold (the relevant temperatures to be determined by independent veterinary experts). Where extreme weather conditions are forecast, such as extreme heat, cold or wet weather, postponement and rescheduling of sales must be considered to minimise the risk to welfare of livestock during transport and saleyard processes.

Use of 'welfare words'

- 3.8 The S&G uses subjective language (or 'welfare words') to significantly qualify or limit the obligations imposed on individuals responsible for the welfare of animals at saleyards and depots. For instance (emphasis added):

3.8.1 S4.1b (v): 'punch or kick livestock, or strike livestock in an unreasonable manner; or'

3.8.2 S5.4: 'A person must not excessively spin cattle around in a selling pen.'

3.8.3 S6.2: 'A person in charge must manage time off water to minimise risk to the welfare of livestock...'

- 3.9 The use of welfare words such as those underlined above (and including such words as 'appropriate', 'reasonable' or 'excessively') are unduly subjective. As these words are not defined in the Glossary, there is a great deal of uncertainty as to the level or extent of cruelty they may permit.

- 3.10 As a result, welfare words effectively leave the interpretation of these obligations to the discretion of the individual(s) the subject of the provision. These individuals may have difficulty ascertaining whether their actions are 'unreasonable' or 'excessive' in any given circumstance, and inevitably results in outcomes where animals are mistreated due to recklessness or carelessness in day-to-day decision making processes.

- 3.11 In Voiceless's view, the effect of welfare words render compliance with those provisions voluntary. As discussed in our response to Question 1, voluntary standards are consistently shown to be ineffective in protecting the welfare of animals, and must be avoided.

4. Recommended amendments to the Proposed S&G

Paragraph	Proposed amendment	Comment
Introduction		
Scope (page 3)	The third paragraph should be amended as follows: ‘They do not apply to on-farm livestock sales, or markets where no permanent livestock handling facilities exist, however, the standards and guidelines should be used for guidance in the management of livestock at on-farm sales and farmers markets. ’	Many, if not all, of the welfare concerns arising in saleyards and depots are inherent in markets used for animal sales. Accordingly, Voiceless considers it incongruous that the S&G does not apply to these markets. Many animals are consigned to and kept in these facilities, and it is important that these animals are afforded the same level of protection as those consigned to saleyards and depots. If it is not commercially feasible or reasonable for the S&G to apply to these facilities, then the facilities are not appropriate to hold animals, and accordingly, they should not be held or sold in these facilities.
General (Page 7)	The last paragraph should be amended as follows: ‘Diseased , sick, injured, drought-weakened, heavily pregnant, <u>pigs, emaciated or unweaned animals or lactating cull dairy cows</u> stock must not be consigned to, or processed through saleyards...’	The added animals are particularly vulnerable to the welfare risks inherent in long distance transport and the conditions at saleyards and depots. These animals are more susceptible to stress from extreme weather conditions, conditions during transport, rough handling and food/water deprivation, amongst other welfare risks. Accordingly, these animals should be delivered directly to their point of destination (whether farm or slaughterhouse) and not subjected to the stressful conditions inherent in saleyards and depots.
1 – Responsibilities and planning		
S1.1	S1.1(i)(a) should be amended as follows: ‘overall responsibility for welfare, care and <u>proper</u> handling of livestock at the saleyard;’.	Amendment to clarify obligation.

	S1.1(ii)(f) should be amended as follows: ‘the selling agents and their staff are responsible for the inspection and selection of livestock <u>as to ensure they are</u> ‘fit for sale’.’.	Amendment to clarify the obligation.
	S1.1(iii)(a) should be amended as follows: ‘provision of appropriate feed <u>and water</u> .’.	Refer to section 3.2 and 3.3 above in relation to the provision of water.
	<p>Insert the following new Standards:</p> <ul style="list-style-type: none"> • S1.1(iii)(b) should inserted as follows: ‘<u>identifying and segregating weak, sick or injured livestock</u>.’. • S1.1(iii)(c) should be inserted as follows: ‘<u>arranging for the appropriate care and treatment of weak, sick or injured livestock</u>.’. • S1.1(iii)(d) should be inserted as follows: ‘<u>communicating to the transport operator the time livestock last had access to feed and water</u>.’. 	<p>Voiceless consider these additional obligations for livestock owners (vendor / buyer) are reasonable and necessary to ensure proper care and treatment of sick or injured animals, and to ensure animals’ feed and water deprivation (FWD) times are properly identified.</p> <p>Refer to Section 3.4 above in relation to maintaining a FWD register.</p>
	S1.1(iv) remove the double bracket in: ‘Consignors (((livestock owner/buyer) ...’	Typo.
	S1.1(iv)(a) should be amended as follows: ‘preparation, including inspection and selection of livestock <u>as to ensure they are</u> ‘fit for the intended journey’;’.	Amendment to clarify obligation.
	S1.1(v)(c) should be amended as follows: ‘the loading including final inspection during loading <u>as to ensure livestock are</u> ‘fit for the intended journey’;’.	Amendment to clarify obligation.
G1.1	<p>Convert the following dotpoint to a Standard:</p> <ul style="list-style-type: none"> • ‘providing suitably constructed and maintained unloading or loading and holding facilities that do not predispose livestock to 	Animals, particularly young, unweaned, pregnant animals and sheep, are predisposed to significant injury at the point of loading/unloading. These risks are exacerbated by high stocking densities, extended journey times, vehicular design, inexperienced handlers, use of dogs /

	injury’	electric prodders, etc. Provision of appropriate facilities, including ramps that are fit for purpose (species specific) and adequately maintained, are essential to avoiding unnecessary injuries to animals. Individuals ‘on the ground’ (including those from Animals’ Angels and Stephanie Dyer) have noted common problems, which include (but are not limited to) the use of ramps that are too small for larger species, gaps between ramps and trucks (resulting in animals’ limbs getting caught during loading / unloading) and ramp inclines being too steep for animals (particularly sheep) to navigate.
	<p>Convert the following dotpoint to a Standard:</p> <ul style="list-style-type: none"> ‘informing the transport company, driver and livestock consignor of any adverse impacts on livestock welfare from the journey that are first observed after arrival’ 	This obligation is critical for identifying, and ensuring the proper care of, animals that may be suffering at saleyards and destined for sale / transport. This obligation could be linked with the requirement to maintain an Animal Welfare Issues Register System (AWIRS), which Voiceless also recommends should be mandatory at all saleyards and depots.
G1.2	<p>Convert the following dotpoint to a Standard as amended:</p> <ul style="list-style-type: none"> ‘The responsible selling agent should<u>must</u> notify their client/s (usually the consignor) of any welfare issues of the stock received at the saleyard.’ 	See comment above.
G1.3	<p>Convert the following dotpoint to a Standard as amended:</p> <ul style="list-style-type: none"> ‘providing feed, water and rest before curfew or loading as appropriate’ 	<p>“As appropriate” is too subjective. Prescriptive guidelines should be developed around the provision of feed, water and rest.</p> <p>Refer to our response to Question 9 (Section 2) above in relation to the provision of feed, as well as Sections 3.2 – 3.4 above in relation to the provision of water and the FWD Register.</p>
G1.4	<p>Convert the Guideline and all dotpoints to a Standard and amend to read: ‘The saleyard management should<u>must</u> appoint an <u>appropriately trained and qualified</u> person to the role of “Animal</p>	Refer to Section 3.5 above in relation to the role of the Animal Welfare Officer.

	<i>Welfare Officer” ...’</i>	
G1.9	Convert the Guideline and all dotpoints to a Standard and replace all instances of the word “should” with “must”.	As previously noted, Voiceless recommends that all saleyards and depots must have in place an (AWIRS) to record all animal welfare incidents and any follow-up treatment / actions that are necessary. The minimal cost and time involved in implementing this system, is outweighed by the significant benefit it will have on improving animal welfare. An FWD Register should be incorporated as part of any AWIRS system (see Section 3.4 above).
	<p>The following grammatical errors should be corrected:</p> <ul style="list-style-type: none"> Record the action taken to address the issue (time, date, action, person/s performing action). <p>Appendix 2 contains an example of an Animal Welfare Incident Report form.’</p>	Typo.
3 – Saleyard facilities for handling livestock		
S3.1	S3.1 should be amended as follows: ‘The saleyard operator must take reasonable actions <u>all steps to maintain and operate the maintenance and operation of</u> livestock handling facilities to ensure the welfare of livestock.’	Removal of overly subjective / qualifying language.
	S3.1(i) should be replaced with the following: ‘ <u>be fit for purpose and appropriate for containing the relevant species;</u> ’.	Amendment necessary to clarify ambiguity in the original drafting.
	S3.1(v) should be amended as follows: ‘have unloading and loading facilities which are appropriate for the livestock and transport vehicles <u>– animals must not be unloaded directly from a utility;</u> ’.	Standard should be amended to avoid animals being thrown/dropped directly off of transport vehicles. Appropriately designed/maintained ramps must be used to offload animals at all times.
	S3.1(vii) should be amended as follows: ‘have suitable watering	Refer to Sections 3.2 -3.4 above in relation to provision of water in

	facilities <u>in all pens to ensure that all animals have adequate access to water;</u> ’.	saleyards and depots, as well as maintaining at FWD register.
S3.2	Delete the subheading ‘Pigs and Calves’. S3.2 should be amended as follows: ‘The saleyard operator must provide for and ensure the holding and selling of pigs, and dairy breed bobby calves <u>all livestock</u> in a saleyard is conducted under a roofed area <u>to provide shade or cooling systems in hot climates and shelter from excessive cold in holding facilities.</u> ’.	Refer to Section 3.6 above in relation to provision of adequate shelter for animals in saleyards and depots. G3.29 has also been incorporated into this Standard.
S3.3	S3.3 should be amended as follows: ‘The saleyard operator must provide water spray facilities and equipment for cooling pigs <u>livestock</u> at a saleyard.’.	
G3.5	Convert to a Standard and replace “should” with “must”.	Amendment is critical to avoid injuries whilst loading / unloading animals from vehicles. As previously indicated loading/unloading is a high risk process for animals and the risks warrant these obligations to be made mandatory.
G3.29	If our proposed amendment to S3.2 is accepted, delete this Guideline.	
G3.34 & G3.35	Convert both Guidelines to Standards and replace “should” with “must”.	Isolation pens and veterinary facilities are essential for ensuring the appropriate care and treatment of sick or injured animals.
G3.37	Remove the extra “G3.37” in the paragraph.	Formatting error.
G3.38, G3.39 & G3.40	Convert all three Guidelines to Standards and replace “should” with “must”.	Facilities must be appropriately maintained, and audits regularly conducted, to ensure animal welfare is not compromised. Regular yard cleaning and elimination of boggy areas is critical to ensuring animals are not exposed to slippery surfaces (to avoid injury) and/or exposed to unhygienic conditions. Accordingly, it is both reasonable and necessary that these Guidelines to be converted to Standards. This should be the responsibility of the AWO (refer to Section 3.5

		above).
4 – Handling and husbandry		
S4.1	Amend to read: ‘A person who handles livestock in a saleyard or depot must do so in a manner that is appropriate to the species and class, and minimises <u>and does not cause</u> pain or injury.’.	Removal of overly subjective / qualifying language. “Minimises” assumes some level of pain and injury is acceptable. All handling methods must not cause pain or injury to animals.
S4.1b	S4.1b(iii) should be amended to read: ‘lift livestock by mechanical means unless the animal is <u>fully</u> supported or secured as necessary ; or’.	Removal of overly subjective / qualifying language (“as necessary”). Further, animals must be fully supported / secured should they be lifted by mechanical means. Lifting animals may cause severe injury, particularly if the support is not species-appropriate, creating a risk that animals may be dropped.
	S4.1b(iv) should be amended to read: ‘throw or drop livestock except from a height which allows the animal to safely land standing on its feet ; or’.	It is never appropriate to throw or drop livestock from a vehicle. The highest possible standards of care must be imposed on handlers during the loading / unloading process. Qualifying this Standard will inevitably result in handlers taking less care whilst loading / unloading animals, and result in unnecessary and preventable animal injuries. Even if animals are able to land on their feet, this does not mean that injuries will not be incurred in the process. Making concessions that permit animals to be dropped will inevitably result in handlers becoming reckless with the welfare of animals.
	S4.1b(v) should be amended to read: ‘punch or kick livestock, or strike livestock in an unreasonable manner ; or’.	Removal of overly subjective / qualifying language. In no circumstance is it reasonable to strike livestock. Animals’ Angels, Stephanie Dyer and other animal welfare advocates ‘on the ground’ have witnessed animals being brutally hit and belted at saleyards and depots. Making concessions around these behaviours will inevitably encourage reckless/careless/aggressive behaviour.
	S4.1b(vii) should be amended to read: ‘drag animals which are unable to stand, except in an emergency to allow safe handling, lifting,	Downer animals must be provided with immediate veterinary care, and should not be dragged. If this provision is sought to address specific circumstances (such as dragging animals that are piled up on

	treatment or humane killing .	top of one another following transport) then a specific provision should be made for this. Again, making open-ended concessions for this sort of behaviour will encourage handlers to drag animals in unnecessary, and potentially harmful, situations.
S4.2	Amend to read: 'A person must not use an electric prodder on a bobby calf or a horse in a saleyard or depot <u>on any livestock</u> .'	Electric prodders should not be used on any livestock in any circumstance. Studies show that the use of electric prodders cause undue stress to animals ²³ and even loss of reproductive function. ²⁴ The need for electric prodders can be negated by good husbandry technique and well-designed facilities. ²⁵
S4.3, S4.4 & S4.5	If the above amendment to S4.2 is accepted, delete Standards entirely.	The following video provides evidence as to why electric prodders should not be used on animals at saleyards and depots. This transporter used the prodder on sheep that were confined to the truck and were unable to escape. According to witnesses 'on the ground', this is a common occurrence at saleyards and depots, resulting in significant distress and injury to animals. https://www.youtube.com/watch?v=71LEq_H_apU
S4.6	Amend to read: 'A person in charge must ensure a dog <u>there are no dogs used</u> in a saleyard or depot is under control at all times.'	It is Voiceless's position that dogs should be completely prohibited at saleyards for the handling of livestock. Research into behavioural characteristics of sheep have warned against the use of dogs for handling as exposure to dogs in confined spaces elevates the stress and hormone levels of sheep. ²⁶ As with the use of electric prodders, the need for dogs can be negated by good husbandry technique and

²³ R D Warner et al, 'Acute stress induced by the preslaughter use of electric prodders causes tougher beef meat' (2007) *Australian Journal of Experimental Agriculture* 47, 782, 783.

²⁴ Temple Grandin, 'Review: Reducing Handling Stress Improves Both Productivity and Welfare' (1998) *The Professional Animal Scientist* 14, 1, 1

²⁵ Ibid at 7

²⁶ G D Houston, (2000) 'Behavioural Principles of Sheep Handling' in T. Grandin (ed.) *Livestock Handling and Transport*, 2nd ed, CABI Publishing: New York

		<p>well-designed facilities.</p> <p>The following video provides evidence as to why dogs should not be used on animals at saleyards and depots. Handlers / transporters are incapable of controlling dogs at all times, and as a result, dogs may be terrify the animals. Distressed, animals often run into gates and fences, resulting in serious injuries – such as broken legs, necks, etc. Operators on the ground note that this is not a ‘one off’ incident, but occurs regularly at saleyards and depots.</p> <p>https://www.youtube.com/watch?v=4XLMi7LRpSE.</p> <p>If dogs are used (although we strongly argue against their use), they must be muzzled such that they are not able to bite any animal (including latch onto the fleece of sheep). Each handler may only have one dog under their control at any one time. If the dog is not adequately trained, or continues to bite animals through their muzzle the AWO is responsible for prohibiting the dog at the saleyard.</p>
S4.9	<p>Replace the words “first reasonable opportunity” with “at the time of unloading”.</p>	<p>Removes any possible ambiguity as to ‘what is the first reasonable opportunity’. Will also enable saleyard operators and handlers to properly identify sick or injured animals, and to provide them with appropriate care / treatment. As indicated previously, the time of unloading is a high risk time in terms of welfare, and this is when animals who are injured or compromised are often left unattended.</p>
G4.4	<p>Convert to a Standard and amend as follows: ‘... <u>Handlers may only use the following acceptable aids</u> for moving livestock: may include flappers, backing boards, rattlers and canes with flaps or flags <u>(however, these aids may not be used to strike or hit animals)</u> attached; hand, arm or body of the stock handler; and dogs.’.</p>	<p>The need for handling aids can be negated by good husbandry technique and well-designed facilities. However, if they are to be permitted, a prescriptive list of “acceptable” handling aids must be provided, to ensure inappropriate or particularly harmful tools are not used on animals. An inclusive list of handling aids is not recommended.</p>

G4.5 & G 4.6	If the above amendment to S4.2 is accepted, then these Guidelines may be deleted. If the above amendment to S4.2 is not accepted, convert to a Standard and replace all instances of the word “should” with “must”.	Refer to Voiceless’s position on the use of electric prodders above.
G4.7, G4.8 and G 4.9	Delete Guideline entirely.	See Voiceless’s position on the use of dogs above.
G4.12	Voiceless’s position is that pigs, emaciated or unweaned animals or lactating cull dairy cows <u>must</u> not be consigned to or processed through saleyards. If this position is accepted, the Guideline should be deleted. If it is not accepted, convert to a Standard and replace “should” with “must”.	These animals are particularly vulnerable to the welfare risks inherent in long distance transport and the conditions at saleyards, including extreme weather conditions, transport, rough handling and food/water deprivation, amongst other welfare risks. Accordingly, these animals should be delivered directly to their point of destination (whether farm or slaughterhouse) and not delivered to saleyards.
G4.13	Convert to Standard and amend as follows: “Whilst it is not recommended that animals in advanced pregnancy <u>must not</u> be consigned to or sold through saleyards, it is recognised that this at times unavoidably occurs. Such animals must should be given special treatment in regard to handling, holding times and provision of feed and water.”	Must be made clear that animals in advanced stages of pregnancy must not be delivered to saleyards.
G4.14	Convert to a Standard and replace “should” and “may” with “must”.	As these animals are particularly vulnerable, these protections must be mandatory / converted to a Standard.
G4.15	Convert to a Standard and replace “should” with “must”.	
G4.17	Convert to a Standard and amend to read: ‘When handling or moving pigs, stockpersons should <u>must only</u> use moving boards and/or flappers <u>to assist with movement</u> ’.	
G4.21	Voiceless’s position is that unweaned animals must not be sent to saleyards. If this position is accepted, Guideline may be deleted. If not,	Bobby calves have not developed adequate coping mechanisms / herd following behaviours to be consigned to, or held in, saleyards. If they

	convert to a Standard and replace “should” with “must”.	must be delivered to saleyards, their particular vulnerability necessitates these protections be made mandatory.
G4.23	Convert to a Standard and replace “should” with “must”.	From our discussions with experts in this field / observers on the ground, drivers often are required to unload animals at unmanned facilities. Provision of water during these times is essential given those animals will be deprived of water for an extended period of time.
G4.24	Convert to a Standard and replace “should” with “must”.	
G4.26	<p>Voiceless recommends the provision of shade / cooling systems at all saleyards and depots, and that animals must not be transported in extreme weather conditions. If this is accepted, provision should be amended accordingly.</p> <p>If not, convert to a Standard and amend as follows: ‘During cold <u>extreme cold or hot</u> weather, care should <u>must</u> be taken to avoid cold <u>or heat</u> stress and wind chill, ...’</p>	Refer to Sections 3.6 and 3.7 above on the transportation of animals in extreme weather conditions, and the provision of shade / cooling systems.
5 – Drafting and Penning		
S5.1	Amend to read: ‘A person in charge must ensure that livestock are not overcrowded in a pen or yard, and must ensure that an <u>all</u> animals <u>are</u> freely able to move, turn around and rise from a lying position unobstructed in a pen or yard.’.	Amendment to clarify obligation. This will also avoid any potential argument that the Standard is complied with if one animal is capable of moving around.
	New S5.2(viii) should be inserted as follows: <u>‘ability for all animals to access clean water’</u> .	Refer to Section 3.2 above in relation to the provision of clean water in each pen, which is accessible to all animals.
	New S5.2(ix) should be inserted as follows: <u>‘general health of the animals’</u>	
S5.4	Remove the word “excessively”.	Spinning of cattle in a selling pen should be prohibited completely. The RIS (at page 30) has mentioned that this is an outdated practice

		which presents a safety risk for workers and may cause distress and trauma to the cattle involved.
G5.3	Convert to a Standard and replace “should” with “must”.	Obligation is essential to ensure good handling of livestock, and will reduce the need to use stressful handling instruments (such as electric-prodders, dogs, etc). Rushing animals is hazardous, and can result in severe injuries – including broken necks from being chased into fences, sheep trying to jump fences and legs breaking when caught in the rails, animals slipping on poor flooring and otherwise unfit animals.
G5.6	Convert to a Standard and amend to read: ‘The density of cattle in selling pens or yards should <u>must</u> allow for all cattle to have access to water.’.	Refer to Section 3.2 above in relation to the provision of clean water in each pen, which is accessible to all animals.
G5.7	Convert to a Standard and amend to read: ‘Horned and polled cattle should <u>must</u> be penned separately unless they arrived penned together in one consignment. If the latter is the case, horn status is recorded as horned. ’.	The risks in penning horned and polled cattle together still exist regardless of whether they arrived penned together or separately.
G5.8	As discussed above, Voiceless recommends that unweaned / young animals are not to be consigned to / kept in saleyards and depots. If this is accepted, Guideline can be deleted. If not, convert to a Standard and amend to read: ‘Lower <u>penning</u> densities should <u>must</u> be used where there are young at foot.’.	
G5.11 & G5.12	Convert both to a Standard and replace “should” with “must”.	

6 – Feed and Water

S6.1, S6.2, S6.3 & S6.4 G6.3 – G6.11	Standards (and Guidelines) to be amended to reflect Voiceless’s position for water to be made available in each pen at all saleyards.	Refer to our comments at Section 3.2 above.
S6.5	Amend as follows: ‘A person in charge must ensure cattle, sheep and goats <u>all livestock (other than horses)</u> which have been held in a saleyard for 36 <u>24</u> hours are provided with adequate and appropriate feed.’.	Refer to our response to Question 9 above in relation to the provision of feed.
S6.6	If the above amendment to S6.5 is accepted, delete Standard entirely.	
S6.8	It is Voiceless’s position that bobby calves should not be transported to saleyards and depots. If this position is accepted, delete Standard entirely.	
G6.1	Convert to a Standard and replace “should” with “must”.	Refer to our comments at Section 3.4 above in relation to the need to establish an FWD Register as part of the AWIS.
G6.2	Convert to a Standard and amend as follows: ‘Post sale, persons responsible for the livestock (owner, owner’s nominee or agent) should <u>must</u> seek the time that livestock have been off feed and water and take this information into consideration when planning the next journey.’.	Guideline contains a grammatical error as there is a missing “)”.’.
G6.12	Convert to a Standard and amend as follows: ‘ Ideally, a <u>A</u> Animals should <u>must</u> not be without food for more than 24 hours including the time spent travelling and yarding. ...’.	Refer to our comments at Section 3.3 above in relation to the provision of feed.
G6.13	Convert to a Standard and replace “should” with “must”.	

G6.16	Voiceless strongly recommends bobby calves and unweaned animals are not transported to saleyards. If this position is accepted, Guideline can be deleted entirely. If not, convert to a Standard and replace “should” with “must”. Bobby calves should also be fed every 24 hours.	
7 – Pre-sale livestock inspection, selection and care of weak, sick and injured animals		
S7.1	<p>S7.1(vi) should be amended as follows: ‘blind in both <u>any</u> eye’.</p> <p>Add new S7.1(vii): ‘<u>showing visible signs of abnormal or cancerous growths</u>’.</p>	<p>Animals’ Angels visited multiple saleyards across Australia in December 2013 and found that some of the most common issues with livestock who should not have been declared ‘fit to load’ were: unable to bear weight on all legs, blind in one eye and showing signs of cancerous lumps or growths.</p> <p>Although animals blind in one eye are fit to travel under the <i>Land and Transport Standards and Guidelines (LTS)</i>, this condition is ‘likely to cause increased pain or distress during transport’.²⁷ To ensure compliance with all LTS Standards, animals with one blind eye should be not be declared fit for sale or transport.</p> <p>The New Zealand Veterinary Association provides the following useful guidelines on when an animal is ‘fit for transportation’, which may be of use in determination the relevant criteria: http://www.nzva.org.nz/policies/12a?destination=node%2F2657.</p>
S7.2	Voiceless strongly recommends bobby calves and unweaned animals are not transported to saleyards. If this position is accepted, Standard may be deleted entirely.	
S7.3	Amend as follows: ‘A person in charge must make the appropriate arrangements at the first reasonable opportunity for the <u>for the immediate</u> separation of distressed, weak, sick or injured livestock for further assessment, rest and recovery, appropriate treatment or	Removal of overly objective language.

²⁷ *Land and Transport Standards and Guidelines SA4.1.*

	humane killing.’.	
S7.4	Amend to read: ‘A person in charge must ensure that appropriate arrangements are made at the first reasonable opportunity for the <u>for the immediate</u> care, treatment or humane killing of any animals assessed as not fit for sale or sick, injured or diseased livestock.’.	Removal of overly objective language.
G7.1	Convert to a Standard and amend to read: ‘Bobby calves <u>must not be</u> selected or presented for sale should .’.	See Voiceless’s position on bobby calves and unweaned animals above.
G7.2	Convert to a Standard and replace “should” with “must”.	See Voiceless’s position on unweaned animals at saleyards and depots above.
G7.5	Convert to a Standard and replace “should” with “must”.	
G7.6	Convert to a Standard and amend as follows: ‘Weak, sick or injured livestock should <u>must</u> be managed to minimise risks to their welfare. Management may <u>must</u> include <u>(as a minimum)</u> providing additional spells, protecting from extreme weather, not mixing with stronger livestock and not transporting unless under veterinary advice.’.	
G7.7, G7.8 & G7.9	Convert to a Standard and replace “should” with “must”.	
8 – Pre-transport selection of livestock		
S8.1	S8.1(vi) should be amended as follows: ‘blind in both <u>any</u> eye’.	See comments above in relation to the assessment of animals that are blind in one eye above.
S8.1	S8.1(vii) – Consider the “within two weeks” assessment.	It is Voiceless’s position that pregnant animals should not be transported to saleyards or depots. Animal science and veterinary experts have identified that animals in the final 10% of their gestation

		<p>period are not fit for travel.²⁸ This is because pregnant animals are more susceptible to stress, injuries and bruising during transport.²⁹</p> <p>The New Zealand Veterinary Association provides the following useful guidelines on when an animal is ‘fit for transportation’, which may be of use in determination the relevant criteria: http://www.nzva.org.nz/policies/12a?destination=node%2F2657.</p>
S8.5	Amend to read: ‘If an animal is assessed to be not fit for the intended journey before loading, a person in charge must make appropriate arrangements immediately arrange for the care, treatment or humane killing of the animal at the first reasonable opportunity.’.	Removal of overly objective language.
G8.1 & G8.2	Convert to a Standard and replace “should” with “must”.	
9 – Humane Killing		
New	New Standard required	<p>There must be a requirement for qualified, competent and trained persons to be responsible for killing animals. These individuals need to be present during high risk times, particularly during unloading / loading out of animals and during hot weather conditions. Formal and ongoing training is required for any individual responsible for killing animals to ensure a fast and humane death.</p> <p>The following video provides disturbing evidence as to the need for only trained/skilled/competent personnel to be responsible for euthanasing animals at saleyards and depots. Operators on the ground note that this is not an isolated incident, and that the individual responsible for not ensuring the humane death of this lamb has a history of poorly killing animals in an inappropriate and</p>

²⁸ Temple Grandin and Carmen Gallo (2007) ‘ Cattle Transport’ in T. Grandin (ed.) *Livestock Handling and Transport*, 3rd ed, CAB International: New York, 134

²⁹ Ibid, at 141

		inhumane way. https://www.youtube.com/watch?v=EPkQRMAqONM .
S9.2	Delete phrase: “during normal saleyard operating hours”	Voiceless submits that if animals are to be penned and kept at saleyards outside of normal saleyard operating hours, there should be a designated person available for humane killing outside of normal saleyard operating hours as well.
S9.6	Delete “take reasonable action to”.	Removal of overly objective language.
S9.7	Amend to read: ‘A person may only not kill an animal using the blunt trauma technique if that animal is either a piglet up to 15 kg live weight, or a calf, kid or lamb less than 24 hours old. The person must kill the animal by a single blow to the head. ’	It is Voiceless’s position that blunt force trauma is not an acceptable method of killing any animal. The AVMA has noted the use of blunt force trauma is an imprecise method and produces inconsistent results. ³⁰ AVMA has recommended alternatives be found to the use of blunt force trauma. ³¹ Voiceless recommends that rifles or captive bolts should be at hand for humane killing purposes, and that these are the only acceptable methods of humanely killing animals.
<i>Note</i>	Paragraph three should be amended to read: ‘... or suffering-. Saleyard managers should ...’.	Typo
G9.4	Convert to a Standard and replace “should” with “must”.	
G9.15	Delete Guideline entirely.	
G9.16	It is Voiceless’s position that exsanguination is an unnecessary practice. Effective use of a captive bolt or rifle, if used properly, is sufficient to kill an animal. If this position is not accepted, convert to a Standard.	

³⁰ American Veterinary Medical Association (AVMA) (2013), ‘AVMA Guidelines for the Euthanasia of Animals’ at 36.

³¹ Ibid, at 36 and 102.

G9.17	Refer above to Voiceless’s position on exsanguination, which is also relevant to pithing. If position is not accepted, convert to a Standard and amend as follows: ‘pithing may be done to ensure death <u>must only be conducted</u> after stunning particularly where blood loss is to be avoided .’.	
Appendix 1		
	Voiceless strongly recommends that Appendix 1 be amended to remove references to blunt force trauma and exsanguination. Refer to comments above.	