



**19 September 2018**

ASEL Technical Advisory Committee

Submitted via online portal: <https://haveyoursay.agriculture.gov.au/review-asel>

### **REVIEW OF AUSTRALIAN STANDARDS FOR THE EXPORT OF LIVESTOCK**

Thank you for the opportunity to provide a submission as part of the *Review of the Australian Standards for the Export of Livestock (ASEL)*.

The ALRTA recommends that ASEL be revised to:

1. Require that registered premises must consult with road transport operators to establish reasonable receival arrangements which might involve longer opening hours or spreading receivals over more days;
2. Require that, by default, registered premises remain open for at least 18 hours on all stipulated receival days, including until midnight, and that sufficient artificial lighting should be provided during unloading if required; and
3. Refer to the ALRTA *Guide for Safe Design of Livestock Loading Ramps and Forcing Yards*.

This position is explained in more detail in the attached submission.

Yours sincerely

**Kevin Keenan**  
National President



## **SUBMISSION ON**

# **REVIEW OF THE AUSTRALIAN STANDARDS FOR THE EXPORT OF LIVESTOCK**

**19 SEPTEMBER 2018**

## 1.0 Introduction

The Australian Livestock and Rural Transporter's Association (ALRTA) is pleased to offer this submission in response to the *Review of the Australian Standards for the Export of Livestock (ASEL)*.

The ALRTA is the peak body representing road transport businesses servicing the agricultural supply chain.

We are a federation of six state associations including:

- Livestock, Bulk and Rural Carriers Association of New South Wales
- Livestock and Rural Transporters Association of Victoria
- Livestock and Rural Transporters Association of South Australia
- Livestock and Rural Transporters Association of Western Australia
- Livestock and Rural Transporters Association of Queensland
- Livestock Transporters Association of Tasmania.

Together our associations represent around 850 transport businesses including owner-drivers, small fleet operators and large fleet operators with hundreds of trucks and trailers.

## 2.0 General Position

The ALRTA recommends that ASEL be revised to:

4. Require that registered premises must consult with road transport operators to establish reasonable receival arrangements which might involve longer opening hours or spreading receivals over more days;
5. Require that, by default, registered premises remain open for at least 18 hours on all stipulated receival days, including until midnight, and that sufficient artificial lighting should be provided during unloading if required; and
6. Refer to the ALRTA *Guide for Safe Design of Livestock Loading Ramps and Forcing Yards*.

This position is explained in more detail in the sections to follow.

## 3.0 The Importance of Live Exports

While acknowledging that there are problems with the current regulatory system, the ALRTA is a strong supporter of continuing live animal exports from Australia, including sheep to the Middle East during the northern summer.

In 2017, Australia exported 2.8 million cattle, sheep and goats valued at \$1.4b. Independent research has shown that saleyard prices for sheep would be around 18-35 percent lower without an export market.

Live exports support more than 13,000 jobs in Australia, with wages in excess of \$1b annually, and the vast majority being in rural areas.

The ALRTA considers that discontinuation of live exports would have significant and far reaching negative consequences for consequences for:

- road transport business (both direct and indirect);
- livestock prices;
- stock numbers and flows;
- local employment;
- service providers, input suppliers and other local businesses; and
- property values, human populations and viability of local community groups.

Over 100 countries around the world export livestock, but Australia has gone further than any other nation to protect animal welfare.

Asian and Middle Eastern markets simply cannot afford to substitute live imports with chilled boxed meat, nor does Australia have the capacity to supply it.

If Australia was to prohibit live exports, Middle Eastern countries would just continue to import live animals from other countries with lower welfare standards.

For example, in 2008-09 Saudi Arabia imported around three million live sheep with 20% of these from Australia. Today, Saudi Arabia imports five million sheep per annum, with none coming from Australia since the introduction of our mandatory animal welfare standards.

Kuwait has publicly advised that if Australia prohibits live exports, they will also look elsewhere for processed product that is currently sourced from Australia. This will result in a double whammy effect on our livestock markets.

Australian meat processors support closure of live exports because livestock prices will drop. Farmers will have no alternative but to accept the processor price.

Live export vessels and companies are extremely mobile and will continue to trade from overseas ports.

We already have some of the world's best live exporters operating in Australia, so rather than surrendering the live export trade to less regulated competitors, we must do what is necessary to lift our standards further.

As a first world nation with modern values and an enforceable rule of law, it is important for Australia to play a leading role in improving live export standards.

This includes stronger regulatory oversight, as outlined in this submission.

## **4.0 A Proactive Industry Approach to Animal Welfare**

Domestically, Australian livestock carriers are subject to legislated *Land Transport Standards*.

Even so, the ALRTA National Animal Welfare Committee has scrutinised our role in the supply chain and championed several important animal welfare initiatives.

For example, we have:

- published national guidelines for the safe design of ramps and forcing yards;
- worked with regulators to establish more flexible driving hours to deal with any animal welfare risk that might arise in transit;
- merged our truckCare animal welfare accreditation system with the award winning truckSafe system;
- developed a national effluent control strategy; and
- established LivestockASSIST – a 24hr national hotline dedicated to coordinating emergency responses.

Our association now has a holistic approach to promoting positive animal welfare outcomes that commences with pre-transit livestock preparation, through loading, transport, unloading and emergency responses in the rare event that things go wrong.

The ALRTA has published our proactive approach in a National Animal Welfare Policy.

The sections below contain recommendations to improve animal welfare and the safety of persons working in the livestock export supply chain.

## 5.0 Opening Hours of Registered Premises

Improved regulation of the opening hours of registered facilities would greatly improve welfare outcomes for animals and drivers.

The first stage of the export process involves the accumulation of animals at holding facilities (typically feedlots) at locations close to the point of export. This facilitates the efficient loading of export vessels prior to departure.

Animals are sourced from many different locations and may need to travel significant distances from their point of origin.

ALRTA members know that there are three fundamental considerations when managing the land transport component for live export:

1. **Loading:** The best time to load animals into trucks for a long distance journey is early in the morning;
2. **Travelling:** Trucks should avoid travelling overnight during the period of highest fatigue risk; and
3. **Unloading:** Animals should be unloaded as soon as possible after arrival and should not be kept on a stationary truck overnight.

Under the current operational arrangements in force at certain registered premises, it is simply not possible to load stock in the morning, travel during daylight hours and then unload stock shortly after arriving at the destination.

Transport operators have raised this issue directly with registered premises to no avail. Regulatory intervention is required to compel registered premises to rectify the situation.

## 5.1 Welfare and Safety Impacts of Current ASEL Interpretation

Certain standards contained in the ASEL quite rightly compel operators of registered premises to quickly unload livestock that have arrived at the premises and offer feed and water.

For example:

- **2B.1 (a):** All livestock at the registered premises must be offered water and feed as soon as possible and no more than 12 hours after arrival.
- **2B.6 (a):** Livestock must be expediently loaded and unloaded by a sufficient number of competent stock handlers in a manner that prevents injury, minimises stress and ensures that livestock husbandry and welfare needs are addressed.

The ALRTA has observed that some registered premises are interpreting these requirements in a manner which is producing negative welfare outcomes for drivers and animals in the loading, travelling and unloading phases.

In effect, registered premises are locking their gates early (sometimes as early as 6pm) and posting security personnel to direct the trucks away from areas adjacent to the premises to avoid scrutiny by observers. These measures are designed to avoid triggering any requirement to unload or offer feed or water under ASEL.

Consequently, drivers travelling for 14 hours or longer must leave prior to 3:30am to ensure they arrive with time to unload before closure. It must also be noted that drivers are actually required to commence work even earlier than this time in order to first travel to the point of pick up and start the loading procedure.

Loading or unloading stock in the dark greatly reduces inspection quality and increases the risk of injury to both animals and the loader alike. This can cause breaches of ASEL standard 1A.1, 1A.1.1. and 1A.1.2 which together require livestock to be inspected during loading into land transport vehicle and unloading at registered premises.

The best way to ensure this occurs is to enable livestock to be loaded into trucks at first light and unloaded at the registered premises immediately upon arrival with the assistance of good artificial lighting when necessary.

Perhaps even more importantly, early closure of registered premises causes long-distance drivers to be on the road during the most dangerous fatigue risk period. Further, unforeseen delays (e.g. breakdown, loading issues, accidents, road work) can increase the pressure on drivers to speed or skip mandatory rest breaks to ensure that they arrive on time.

These however are only the undesirable consequences applicable when long-distance trucks do arrive on time. There are even less desirable impacts for all trucks (long or short distance) arriving after closing time.

Without facilities to unload, animals must remain in the vehicle overnight. If stock have not been correctly curfewed (which is often the case) excessive effluent will accumulate in the crate giving rise to welfare issues and the possibility of stock rejection. During winter, exposure to the elements is also a factor.

There are significant impacts for drivers too. Drivers forced to use sub-standard parking areas have no access to basic amenities such as showers, toilets or catering. Movement or noise caused by loaded animals further reduces the quality of sleep which in turn increases fatigue risk on the return journey.

In addition, ASEL standard 1A.3.4 (f) (i) states that: *The following classes of livestock must not be prepared for export by sea to Middle Eastern Countries during the period from 1 May to 31 October: (C) sheep and goats that have been held on trucks for more than 14 hours.*

Such consignments that arrive after a registered premises has closed will not be fit for export, having consequential impacts for the producer, exporter, customer and transport operator.

## 5.2 A Regulatory Solution

Given the undesirable impacts for long distance trucks arriving both prior to and after closure of registered premises, the ALRTA asserts that the only workable solution to the problem is to specify the minimum opening hours of registered premises on receival days under enforceable standards.

If anything, the 2014 review of ASEL moved in entirely the wrong direction.

Previously the ASEL stated that at S3.13(a) that *'Livestock must be unloaded as soon as possible after arrival at the registered premises.'*

This statement is now absent from the revised version of ASEL. As is evident in ASEL standard 2A.2(f), the focus has shifted to *'Access to the premises must be controlled at all times'*.

Registered premises are using this 'control' to prevent trucks loaded with livestock from arriving at all and appear unwilling to engage with transport operators to establish more reasonable receival arrangements.

In order to provide a realistic operating environment that promotes positive welfare outcomes, the ALRTA strongly recommends that the Australian Government amend the ASEL to require that registered premises must consult with road transport operators to establish reasonable receival arrangements which might involve longer opening hours or spreading receivals over more days.

By default, registered premises should be required to remain open for at least 18 hours on all stipulated receival days, including until midnight, and that sufficient artificial lighting should be provided during unloading if required.

This is the only way to guarantee that drivers transporting stock for live export are able to load stock in the morning, travel during daylight hours and then unload stock shortly after arriving at the destination.

**Recommendation 1:** That ASEL requires that registered premises must consult with road transport operators to establish reasonable receival arrangements which might involve longer opening hours or spreading receivals over more days.

**Recommendation 2:** That by default ASEL requires that registered premises remain open for at least 18 hours on all stipulated receipt days, including until midnight, and that sufficient artificial lighting should be provided during unloading if required.

## 6.0 Safe and Efficient Ramps and Forcing Yards

The quality of ramps and forcing yards has a significant bearing on the animal welfare and personnel safety.

The ALRTA is supportive of the following ASEL standards:

- **2A.2 (c) (iv):** Floors of yards, sheds, pens and loading ramps must have non-slip surfaces; and
- **2A.2 (g):** Unloading facilities must be designed, constructed and maintained to enable safe and efficient unloading of livestock.

However, these standards should go further by referring to the ALRTA *Guide for Safe Design of Livestock Loading Ramps and Forcing Yards*.

This ALRTA guide was published in 2015 after being developed in consultation with the entire livestock supply chain. It remains the best source of information on ramps and forcing yards.

The ALRTA guide has previously been referenced in Australian Government animal welfare regulations. For example, within the section on 'Saleyard Facilities for Livestock', the ministerially approved *Australian Animal Welfare Standards and Guidelines for Livestock and Saleyards and Depots* makes a direct reference to the ALRTA Guide.

The guide can be found here: <http://alrta.org.au/ramps-guide/>

ALRTA is currently working with Standards Australia to convert the guide into an Australia Standard.

**Recommendation 3:** That ASEL refer to the ALRTA *Guide for Safe Design of Livestock Loading Ramps and Forcing Yards*.