

LIVESHIP

Submission to Stage 1 of the 2018 Departmental Review of the Australian Standards for the Export of Livestock

Introduction

Liveship is an association tasked with helping livestock ship owner/operators work with Government and the export industry at large to promote the efficient transport of live animals by sea from Australia by:

- Consulting with Government on changes to applicable statutory requirements
- Liaising with other industry bodies and external stakeholders;
- Achieving greater recognition for the shipping sector of the industry;
- Furthering its own knowledge of the export industry; and
- Providing objective information for the purposes of public education and media relations.

LiveShip currently has eight active members, who together operate a total of some 28 dedicated livestock carriers, each of which is surveyed and certificated by the Australian Maritime Safety Authority (AMSA) to transport live animals by sea from Australian ports.

Some are solely owner/operators chartering their ships to different exporters, whilst others are part of a vertically integrated commercial chain of livestock based activities comprising stock, stations, stock feed mills, feed lots, dedicated ships, port facilities, overseas distribution networks, etc.

LiveShip members have a unique capacity to provide detailed information concerning shipboard aspects of the export of livestock by sea and welcome the opportunity to contribute to the work of the Technical Advisory Committee appointed by the Department of Agriculture and Water Resources to review the Australian Standards for the Export of Livestock (ASEL).

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LIVESHIP

In Stage 1 of the review the Technical Advisory Committee (TAC) is seeking comments on a proposed new format for the ASEL, together with the key issues to be addressed through a series of questions. LiveShip responses to each are provided under.

Proposed New Format For ASEL

1. Is the proposed version clear and concise?

Yes.

2. Are any regulatory requirements missing?

None as far as LiveShip is aware.

3. Are any regulatory requirements duplicated?

The reference to MARPOL 73/78 at 1.3 of the re-formatted ASEL, along with the mention of feed storage tanks at 3A.3.2(f) and water reserves, Appendix G, Tables 13 and 14, are all covered off in Marine Order Part 43, noting that AMSA has this legislation under review and an amended draft will be available for public comment shortly.

4. Can the proposed new format be improved? Where? How?

LiveShip has no suggestions for improvement at this stage.

Issues To Be Addressed

5. What are the three most important issues for the committee to consider as part of this review? Why are these issues important? Does information exist to support a change?

LiveShip members own and/or operate a number of both larger and smaller sized ships in a variety of trades carrying various species of animals to ports in many different parts of the world; consequently each has their own perspective on the export of Australian livestock.

Whilst there is general agreement that the 13 unresolved issues from the previous review need to be addressed, many of these issues are considered to be interlinked and consequently no consensus has been reached in prioritising them.

There is a view however that the proper preparation, rest and vaccination of the livestock prior to loading have a direct impact on shipboard animal welfare and voyage outcomes.

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6. Are you aware of any emerging research, data or scientific evidence the committee should consider in planning future review stages?

There are a number of R&D projects in hand and/or completed under the auspices of the MLA/LiveCorp Livestock Export Research and Development Advisory Committee that may be of assistance as the TAC goes about its work, see: <http://www.livecorp.com.au/research-development/report>
