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ASEL Technical Advisory Committee

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

REVIEW OF AUSTRALIAN STANDARDS FOR THE EXPORT OF LIVESTOCK: AIR TRANSPORT

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

The ALRTA makes the following recommendations:

- **Recommendation 1:** That ASEL require businesses engaging in live export via air to ensure that good quality, fit-for-purpose loading/unloading equipment is provided including forcing yards, ramps and enclosed gantries.
- **Recommendation 2:** That maximum travel time from the property where livestock are sourced to the airport is calculated based on total time off water limits for the entire journey.
- **Recommendation 3:** That ASEL require chain parties to communicate the time and date when feed and water was last offered (feed and water should be recorded separately).
- **Recommendation 4:** That ASEL require livestock returned to property of origin to be spelled for 24hrs prior to being reloaded for land transport.
- **Recommendation 5:** That in due course, ASEL refer to effluent management risks and controls (including curfews) outlined in the *registered code of practice for the management of effluent in the livestock supply chain*.
- **Recommendation 6:** That *Australian Animal Welfare Standards and Guidelines: Land Transport of Livestock* remain the primary source of livestock inspection regulation during land transport.

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

Yours sincerely

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SUBMISSION ON

REVIEW OF THE AUSTRALIAN STANDARDS FOR THE EXPORT OF LIVESTOCK: AIR TRANSPORT

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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): Air Transport*.

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 700 transport businesses including owner-drivers, small fleet operators and large fleet operators with hundreds of trucks and trailers.

2.0 General Position

The ALRTA makes the following recommendations:

- **Recommendation 1:** That ASEL require businesses engaging in live export via air to ensure that good quality, fit-for-purpose loading/unloading equipment is provided including forcing yards, ramps and enclosed gantries.
- **Recommendation 2:** That maximum travel time from the property where livestock are sourced to the airport is calculated based on total time off water limits for the entire journey.
- **Recommendation 3:** That ASEL require chain parties to communicate the time and date when feed and water was last offered (feed and water should be recorded separately).
- **Recommendation 4:** That ASEL require livestock returned to property of origin to be spelled for 24hrs prior to being reloaded for land transport.
- **Recommendation 5:** That in due course, ASEL refer to effluent management risks and controls (including curfews) outlined in the *registered code of practice for the management of effluent in the livestock supply chain*.
- **Recommendation 6:** That *Australian Animal Welfare Standards and Guidelines: Land Transport of Livestock* remain the primary source of livestock inspection regulation during land transport.

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 via air transport.

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 Safe and Efficient Ramps, Forcing Yards and Equipment

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

ALRTA members report that some businesses engaging in live export by air are under investing in good quality, fit-for-purpose, infrastructure necessary to facilitate the task of safely and efficiently loading livestock into cargo planes.

Currently, trucks are used as mobile forcing yards. Livestock are transferred directly from the truck into the boxes in which they will be held during air transport.

In some locations, this process is neither safe or efficient. In Queensland, our members report that the process works well. In Victoria and Western Australia our members report that boxes sometimes move away from the trailer during the loading process, resulting in opportunities for livestock to escape onto the runway environment. Handlers must also climb on the inside of the crate which increases the risk of slips, trips, falls, cuts, crushing and bruising – or in extreme cases, death.

The use of fit-for-purpose loading infrastructure can greatly improve safety and efficiency. Recently, an ALRTA member in WA who was fed up with unsafe and inefficient practices sourced and provided all of the necessary loading equipment including a mobile ramp, yards and gates. This reduced the time taken to unload 4 b-doubles from 8 hours to 4 hours, while also dramatically reducing safety risks for handlers.

Victorian ALRTA members report that it usually takes between 9 – 12 hours to unload 4 b-doubles using the sub-standard equipment provided at the airport.

More efficient loading is also beneficial for animal welfare. Fit-for-purpose equipment reduces the risk of injury and promotes a lower stress environment. In addition, the total travel time from the domestic sourcing point to the final international destination can be reduced – an important consideration for managing total time off feed and water.

In addition, efficient and safe livestock unloading practices at the airport can help reduce heavy vehicle driver fatigue, making Australian roads safer for all road users.

Ideally, businesses engaging in regular live export via air transport should be investing in good quality fit-for-purpose equipment, including:

- **Common holding and forcing yards:** Livestock could be rapidly unloaded from trucks into common yards made available to all transport companies and exporters and settled before being loaded into boxes. This will also provide an opportunity to offer livestock feed and water prior to loading (when appropriate to do so).
- **Good quality loading and unloading ramps:** ALRTA recommends that the ASEL standards refer to the ALRTA [Guide for Safe Design of Livestock Loading Ramps and Forcing Yards](#) (Click on link to access guidelines).
- **Enclosed gantries:** Safety can be further enhanced through the provision of enclosed fixed gantries or mobile loading platforms such as a ProWay [Pivot Access Unloading Frame](#) (click on link to see video).

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 requiring better quality equipment as outlined above.

Recommendation 1: That ASEL require businesses engaging in live export via air to ensure that good quality, fit-for-purpose loading/unloading equipment is provided including forcing yards, ramps and enclosed gantries.

6.0 On-Farm Preparation of Livestock

Regulation of total time off water is a key element of the *Australian Animal Welfare Standards and Guidelines: Land Transport of Livestock*. ALRTA supports the maximum time periods for each class of animal stipulated in the standards.

It is important that time off-water time limits are applied cumulatively to all parts of the journey – including the air transport phase.

Time limits applicable to the land transport phase must take the entire journey into account. This requires reliable communication between receivers, transport operators, drivers and persons responsible for pre-transit livestock preparation.

If, as suggested by ALRTA in the section above, airports were required to provide common access holding / forcing yards, it would be possible to provide water to livestock in between the land transport and air transport phases. Availability of such facilities could extend the potential length of the land transport phase and also provide options for dealing with unforeseen delays in the land transport phase that may have consequential impacts on the remainder of the journey (including the possibility of having to return the animals to farm or to nearby facility).

When considering whether or not the standards should define a minimum rest period if livestock are returned to a property prior to being reloaded onto a truck for export, it is important to consider the welfare of the truck driver. Fatigue laws will typically require drivers to have at least a seven hour long break in any 24hr period. Depending on the overall length of the journey, it is perhaps reasonable that livestock should be required to be spelled for around 24hrs to allow time for both the driver and the livestock to be 'reset' for another journey (including unloading, driver rest, water/feed offering, curfew and reloading).

Recommendation 2: That maximum travel time from the property where livestock are sourced to the airport is calculated based on total time off water limits for the entire journey.

Recommendation 3: That ASEL require chain parties to communicate the time and date when feed and water was last offered (feed and water should be recorded separately).

Recommendation 4: That ASEL require livestock returned to property of origin to be spelled for 24hrs prior to being reloaded for land transport.

7.0 Fodder and Water Requirements

ALRTA generally supports ASEL requirements (S2.8) concerning the application of green feed curfews prior to land transport. However, ALRTA member operators report that, in practice, these curfews are not always applied and there is no active enforcement of breaches.

In addition, ALRTA is concerned that:

- There is no minimum feed curfews for livestock on grain; and

- There is no minimum water curfew.

ALRTA is currently developing a *registered code of practice for the management of effluent in the livestock supply chain* in consultation with the livestock supply chain and biosecurity and animal welfare advocates. We expect a final registered code to be available within 12 months.

It is likely that the code will address maximum curfew times to take account of concerns already raised about animal welfare.

In due course, it would be beneficial for ASEL to refer to the final version of this code to ensure that best practice curfews are applied both in the domestic and export supply chains.

Recommendation 5: That in due course, ASEL refer to effluent management risks and controls (including curfews) outlined in the *registered code of practice for the management of effluent in the livestock supply chain*.

8.0 Inspection of Livestock

The *Australian Animal Welfare Standards and Guidelines: Land Transport of Livestock* already include regulations concerning the inspection of livestock at various points in the supply chain. Meat and Livestock Australia and Australian Pork Limited have published supporting 'fit-to-load' quick reference guides for supply chain parties.

ALRTA considers that it is not necessary to require additional inspections at other points in the supply chain.

Recommendation 6: That *Australian Animal Welfare Standards and Guidelines: Land Transport of Livestock* remain the primary source of livestock inspection regulation during land transport.