



7 March 2023

Department of Agriculture, Fisheries and Forestry
Consultation on Inspector-General of Animal Welfare

Via: <https://haveyoursay.agriculture.gov.au/Inspector-General-Animal-Welfare>

FEEDBACK ON INSPECTOR-GENERAL OF ANIMAL WELFARE

The Australian Livestock and Rural Transporter's Association (ALRTA) is pleased to offer this submission in response to the consultation paper on an Inspector-General of Animal Welfare.

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.

The ALRTA's National Driver and Animal Welfare Committee considered the consultation paper and specific consultation questions on 24 February 2023. Our comments are outlined below.

General Comments

ALRTA supports the establishment of an Inspector-General of Animal Welfare. We note however that the Inspectorate is limited in function to matters concerning live animal exports. More specifically, the Inspector-General's role will be limited to reviewing / reporting on performance of the Commonwealth, Department and officials and how animal welfare related matters are detected, investigated, dealt with and reported.

This does not appear to be a significant expansion of the current role of the Inspector-General of Live Animal Exports. Rather, it seems only that the current objectives will be marginally expanded.

Animal welfare standards expected by the Australian community and our trading partners are constantly changing. While some of this evolving expectation is based on new and emerging research, it is also shaped by the availability of information and changing attitudes.

ALRTA believes that there is scope for the new office to monitor changes in animal welfare expectations over time, examine whether or not current export laws are adequately addressing these issues and to make recommendations to government about how such issues might be best addressed in future.

PO Box 4233 MANUKA ACT 2603

P: 02 6247 5434

F: 02 6247 0476

ABN:16 034 545 414

E: office@alrta.org.au W: www.alrta.org.au

Together We Are Stronger

Under this proposal, the office would not merely observe compliance with the animal welfare standards elsewhere established by government (e.g. ASEL), it would proactively consider and report to government about emerging issues and options for addressing them.

Recommendation 1: *That the Inspector-General of Animal Welfare take an active role in monitoring new animal welfare research and the evolving attitudes of the Australian community and our trading partners.*

Recommendation 2: *That the Inspector-General of Animal Welfare proactively consider and report to government about emerging animal welfare issues in the export supply chain including options for ensuring that Australian standards and practices remain contemporary.*

Responses to Specific Questions

1. *What animal welfare objectives related to livestock exports would be most valuable and why?*
2. *What other objectives related to livestock exports could be considered within the scope of the IGAWLAE's work?*
3. *How should the objectives related to livestock exports be prioritised (if not all could be included)?*

The livestock export supply chain commences with a domestic decision to offer livestock for sale, or to purchase livestock, with an intention or expectation that the animals will be exported live.

In ALRTA's view, there are sub-optimal practices that occur within the domestic live export supply chain that should be improved, but do not seem to be specifically addressed via ASEL (or the Commonwealth, Department or officials).

As demonstrated in the animal welfare incident reports tabled by Minister Watt in the Australian Senate (signed 15 September 2022), a small minority of animals arrive at export premises with conditions that should have rendered them unfit to load or with injuries that have occurred during the handling, loading, transport or unloading process.

Under the current proposal, the Inspector-General of Animal Welfare would simply document and report on these occurrences, without necessarily delving into the reasons for the incidents or considering measures that could be applied to reduce occurrence.

ALRTA understands some of these reasons and we have previously articulated our views to the Department (for example, during ASEL reviews or via the Live Export Animal Welfare Advisory Group). However, the response to our concerns is usually that the matters raised are outside of the current scope of ASEL or export control laws. Yet, these matters are of direct significance to animal welfare outcomes and should be proactively addressed. For example:

- **Design and Operation of Export Facilities:** The design and operation of export facilities, especially those used for air exports, are not fit for purpose. Crates and ramps are poorly designed (or not designed for that particular purpose at all) and practices are 'work arounds' (for example placing crates directly against other crates without flaps and infill to prevent injury to livestock). Persons supervising the process onsite (for example security guards) have absolutely no knowledge of the process and the needs of transporters visiting the site.

- Opening Hours of Receiving Facilities:** 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. Animals are sourced from many different locations and may need to travel significant distances from their point of origin. To avoid having to comply with ASEL requirements compelling operators of registered premises to quickly unload livestock that have arrived at the premises and offer feed and water (e.g. 2B.1(a) & 2B.6 (a)), 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. Consequently, drivers travelling for 14 hours or longer must leave prior to 3:30am to ensure they arrive with time to unload before closure. Loading or unloading stock in the dark reduces inspection quality and increases risk of injury to both animals and the loader alike.
- Application of New Australian Standards:** Standards Australia has published AS 5340:2020 *Livestock loading/unloading ramps and forcing pens*. This standard should replace all references in ASEL within the suite of animal welfare standards comprising the Australian Animal Welfare Standards and Guidelines.
- Effluent Management:** Livestock producers remain reluctant to apply feed and water curfews to animals prior to loading for land transport. This means that the livestock produce excessive effluent within the crate that cannot be contained, creating risks to animal welfare (through slips, trips, falls, freezing and discomfort), biosecurity, road safety and amenity. SA1.1 of the nationally agreed [Land Transport Standards](#) establishes responsibilities for 'feed and water provision' and 'holding periods before loading'. The National Heavy Vehicle Regulator has recently published a registered Code of Practice for [Managing Effluent in the Livestock Supply Chain](#). The live export supply chain should engage in best practice with regard to effluent management.
- Information about Liveweights:** SA1.1 of the [Land Transport Standards](#) establishes a specific responsibility for 'loading density'. More specifically, SA5.4 requires the driver to assess loading density for each pen or division of a livestock crate or container (with reference to the loading density tables specified for each species in Part B). The loading densities contained in the Land Transport Standards also form the basis of relatively generous loaded vehicle mass allowances specified in state-based livestock loading schemes. Penning densities are necessarily calculated with reference to mean live weight of animals and crate floor area. Floor areas are generally fixed and known to the transporter. Mean live weight is variable and must be advised by the owner. To avoid overloading/overcrowding issues a live weight declaration should accompany all consignments of animals destined for live export.
- Communication During Shipping Delays:** The second land phase of the live export operation is transporting stock from holding facilities to the export vessel. This is a major time critical undertaking that requires a large number of trucks working cooperatively to deliver stock in an efficient and orderly manner. Operators involved in this part of the exercise report that there is often great uncertainty around when the loading period will actually commence. All too often the loading time advised to the operator is not met. Operators and drivers are usually 'in the dark' about any subsequent delay and the reasons for it. Delays impose significant costs on land transport operators because they are unable to undertake any other work while waiting to load the vessel. A 24 – 48 hour delay might take ten trucks and

more than twenty trailers off the road and render them unproductive for that entire period. Communication around ESCAS certification and inspection processes must be improved.

Recommendation 3: *The objectives of the Inspector-General of Animal Welfare be broad enough that activities can encompass:*

- *Review and reporting on the design and operation of live export facilities (including accumulation feedlots and port facilities);*
- *Identifying new relevant Australian Standards or Codes of Practice relevant to live export and making recommendations about how these should be adopted;*
- *Reviewing documentation used in the live export chain (for example National Vendor Declarations) and making recommendations about how it can better support the objectives of applicable regulations such as the Land Transport Standards.*
- *Reviewing and making recommendations concerning departmental communication practices to supply chain parties.*

4. *What animal welfare information related to livestock exports would be valuable to be included in reports to the Parliament?*
5. *What animal welfare information related to livestock exports would be valuable to be published on the department's website?*

ALRTA considers that the information available to the Parliament and the public (via the Department's website) should essentially be the same.

However, all efforts should be made to ensure that:

- Information reported is factual and not based on any express opinion of an individual or the Department;
- Any recommendations are well reasoned, supported by data, and allowing stakeholders a right of reply (generally by way of a consultation process); and
- Information that may identify individual businesses or persons should be redacted to protect personal safety and business viability.

Recommendation 4: *That information available to the Parliament and the public (via the Department's website) should essentially be the same.*

Recommendation 5: *That the Inspector-General of Animal Welfare have a duty to ensure that:*

- *Information reported is factual and not based on any express opinion of an individual or the Department;*
- *Any recommendations are well reasoned, supported by data, and allowing stakeholders a right of reply (generally by way of a consultation process); and*
- *Information that may identify individual businesses or persons should be redacted to protect personal safety and business viability.*

6. *Considering the objectives of the IGAWLAE, what experience, skills and capabilities would be desirable in recruiting animal welfare expertise/staff into the office?*

The Inspector-General of Animal Welfare will require a broad mix of experience, skills and capability. Of particular interest to the ALRTA is that at least some staff have real life operational experience working within the live export supply chain. This will ensure that the Inspector-General of Animal Welfare has a practical understanding of the live export supply chain, enhancing its ability to consider data (needs, limitation, interpretation etc), analysis of operations, relevance of evolving community expectations, application of new standards/codes/regulations and development of recommendations to improve animal welfare outcomes in live export.

Recommendation 6: *That the Inspector-General of Animal Welfare recruit expertise/staff with real life operational experience working within the live export supply chain.*

If you would like to discuss this matter in more detail please do not hesitate to contact the ALRTA Executive Director, [REDACTED]

Yours sincerely

[REDACTED]

Scott McDonald
National President