

Matthew Munro
Executive Director
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Via email: project@alrta.org.au

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Dear Matthew

Re: Input to the Code of Practice - managing effluent in the livestock supply chain

WoolProducers Australia (WoolProducers) welcomes the opportunity to engage in the Australian Livestock and Rural Transporters Association (ALRTA) consultation on a Code of Practice for the management of effluent in the livestock supply chain.

WoolProducers is the national peak industry body representing Australia's wool growers. Our membership covers the industry's commercial, superfine and stud breeding sectors. WoolProducers is nationally representative through our State Farming Organisation (SFO) members and three democratically elected Independent Directors. WoolProducers' work also includes the provision of advice to Animal Health Australia and state and federal governments on behalf of the wool industry. WoolProducers works closely with the Department of Agriculture and Water Resources on key issues such as animal health and welfare, biosecurity, pest management control, natural resource management, drought preparedness, emergency animal disease outbreak preparedness and industry development, including research and trade.

Managing effluent in the livestock supply chain (particularly during transport) is a responsibility shared between producers, industry and transporters. WoolProducers supports best practice by farmers and industry and was involved in the development of the *Australian Animal Welfare Standards and Guidelines - Land Transport of Livestock* (from here on in referred to as 'the Guidelines'), published in 2012. The Guidelines replace individual state/territory livestock transport provisions of the Australian model codes of practice for the welfare of animals. The Guidelines provide a basis for development and implementation of consistent legislation and enforcement across Australia and provide guidance for all people responsible for livestock before and during transport.

The Guidelines outline important transport information relative to ALRTA's consultation on effluent management during transport. This information includes (but is not limited to) animal health and welfare components such as feed and water curfews, safe loading and unloading practices, species-specific information regarding transport, and ensuring animals are properly prepared for transport.

WoolProducers was also involved in the development of the *Fit to Load Guide* (FTLG) produced by Meat and Livestock Australia. The FTLG includes information on preparing livestock for transport and outlines feed and water curfews for cattle, sheep, goats and pigs.

WoolProducers ask that ALRTA provide the rationale for developing a Code of Practice for effluent management in the livestock supply chain, including information from the National Heavy Vehicle Regulator on the need for the Code of Practice and potential future uses for the Code. We also request more information on how current feed and water curfews for sheep are not reducing effluent accumulation during transport, and the relevance of this to the need for the development of a Code.

Information on the amount of effluent spillage from transport vehicles is also sought by WoolProducers. Differences between industry requirements throughout the supply chain (for example, Meat Standards Australia requirements) must be accounted for within a Code of Practice if developed, and we seek assurance that the Code will be developed with ongoing industry consultation to ensure current requirements are not compromised by a Code of Practice.

As aforementioned, responsibility for managing effluent during transport is shared between the person responsible for preparing livestock for travel and the transport driver. The person responsible for preparing livestock to travel should ensure that livestock are fit to travel and that the appropriate time off feed and water has been adhered to in accordance with the Guidelines and FTLG. The transport driver is responsible for ensuring that the vehicle is safe and in good working order so that the health and welfare of the animals is not compromised, and that the vehicle is free from effluent prior to travel and that effluent tanks (if installed) are empty.

During transport, the driver is responsible for ensuring that effluent accumulation in the vehicle is appropriately managed and that tanks are emptied as required. As such, the onus of responsibility once the animals are loaded lies with the driver. It is important that transporters can demonstrate the practices they undertake before, during and after a journey as part of their responsibility to manage effluent during transport. To assist in managing effluent, WoolProducers supports the installation of effluent tanks on vehicles with more than two axles. This is one step towards assisting transporters to manage effluent responsibly and reducing the risk of effluent spillage from livestock vehicles.

To further assist the efforts of drivers in managing effluent during transport, WoolProducers is supportive of effluent traps being strategically located and easily accessible so effluent tanks can be emptied and effluent accumulation in vehicles is kept to a minimum. We encourage ALRTA to work with the relevant commonwealth and state governments to provide effluent traps in suitable locations across Australia. There is an opportunity for saleyards, processors and even farmers to provide locations for effluent pits to be built. Of course, it is important that high biosecurity practices are upheld if vehicles would be entering onto these properties with non-resident animals.

Funding of this infrastructure should be discussed with industry and governments to determine cost recovery schemes and revenue raising for the management of effluent pits. In determining cost recovery, it will be necessary to consider the number of each livestock species travelling in areas where the pits are located, and differences in the amount of effluent produced by livestock species during transport. Knowing whether the sites will be local-, state- or federal- government managed will assist decision making. WoolProducers requests that ALRTA provides this information to industry.

Further information relative to the consultation is included in the risk matrix provided by ALRTA. These are initial thoughts and WoolProducers looks forward to continued involvement in the consultation process. Should you have any questions about this letter or the matrix, please do not hesitate to contact WoolProducers' Policy Manager, Ashley Cooper on 0455 442 776 or via email (acooper@woolproducers.com.au).

Yours Sincerely,



Jo Hall
CEO

Hazard: 1. Effluent from a heavy vehicle carrying livestock spills onto a road surface or in the road corridor			
Risk	Likelihood	Consequence	Controls
	L= Low M= Medium H = High	Consider: <ul style="list-style-type: none"> • Safety • Environmental • Infrastructure • Financial • Reputation 	Hierarchy: <ul style="list-style-type: none"> • Remove the hazard • Substitute with something safer • Change the way the activity is carried out • Implement policies and procedures
Road user crash	L	Safety – road user death or serious injury	<ul style="list-style-type: none"> • (for example) yard sheep for 48 hours • Dry feed only when livestock are yarded before loading • Consider the need for effluent containment tanks - if required due to journey distance, duration, season, weather and/or road conditions, check with vehicle operator that the heavy vehicle trailer has effluent containment tanks fitted • Ensure effluent containment tanks are empty at time of loading • Consider weather conditions at loading site, in transit and at destination • Regularly monitor effluent levels in tanks and trailer • Other...
Differences in consistency of faecal matter between livestock species	L	Sheep faecal matter is more solid in form than cattle faecal matter, which is more liquid in its consistency. Therefore, the risks of vehicles (such as motorcycles and scooters) slipping on sheep effluent on the road would be less than the risk presented by cattle effluent on the road.	<ul style="list-style-type: none"> • Following the Land Transport of Livestock Standards and Guidelines will see livestock prepared appropriately for transport, including minimisation of the amount of effluent that might be produced by livestock during the journey (feed and water curfews): <ul style="list-style-type: none"> ○ Feed animals dry hay or fibre before transport to sustain them for the journey, particularly if lactating or weak. ○ Consider seasonal conditions and feed type when determining appropriate water-deprivation time(s).

		<p>For example, on-farm a 45kg lamb produces approximately 1.8 litres of manure daily. Therefore, a rough guide is that ten 45kg lambs will produce nearly 18L of manure daily (0.018 cubic metres). The physiological state of the animal must be considered in calculating the capacity required for tanks. Animals that are stressed will urinate and defecate more than usual. But, feed and water curfews prior to transport must also be accounted for.</p>	<ul style="list-style-type: none"> ○ Consider mustering and yarding periods when determining when livestock will travel. Ensure that curfew requirements for feed and water are appropriate. ● Effluent tanks on vehicles must have large enough capacity to hold the amount of effluent that is expected to be produced during a journey. ● Ensure vehicle effluent tanks are empty before livestock are loaded. ● Ensure effluent traps are monitored and emptied as required so that they can contain effluent produced during transport. This minimises the risk of effluent falling onto roadways and road corridors.
Appropriate capacity of effluent tanks on vehicles	M	See above	See above

Hazard: 2. Livestock effluent accumulates in a heavy vehicle trailer			
Risk	Likelihood	Consequence	Controls
	L= Low M= Medium H = High	Consider: <ul style="list-style-type: none"> • Safety • Environmental • Infrastructure • Financial • Reputation 	Hierarchy: <ul style="list-style-type: none"> • Remove the hazard • Substitute with something safer • Change the way the activity is carried out • Implement policies and procedures
Transport vehicles do not have tanks to capture effluent	L	Effluent cannot be captured in tanks, therefore spills onto roads. Financial cost of having to install effluent tanks on vehicles that do not have them. Risk of disease and weed spread.	<ul style="list-style-type: none"> • Phased implementation of effluent tanks installed on commercial vehicles and private vehicles over a certain size. • Phased implementation will allow companies/individuals to prepare for the cost of installing effluent tanks. • Having tanks on vehicles to capture effluent will reduce the risk of disease and weeds being spread.

<p>Effluent traps are not accessible to empty effluent tanks into</p>	<p>M</p>	<p>Transport vehicles may be unable to access effluent traps at some locations for reasons that may include biosecurity entry/exit protocols, traps are full and cannot be used, or accessibility issues such as locked gates that prohibit entry of vehicles to use the traps.</p>	<ul style="list-style-type: none"> • Ensure effluent traps are accessible at all times, including any traps that may be located on private property but listed as usable by public vehicles. • Effluent traps are in locations that are easy for heavy vehicles to access, and vehicles can safely exit and enter roads to reach the effluent traps. • Effluent traps are in strategic locations that enable trucks to empty tanks regularly/as required. • Guidelines on monitoring and emptying of effluent traps should be established so that they do not reach capacity and impede trucks being able to dump.
<p>Livestock injury/carcass damage caused by slipping on effluent in vehicles</p>	<p>M</p>	<p>Effluent accumulation may result in livestock slipping in vehicles, leading to carcass bruising or injury. Slippage can cause some animals to fall and these animals may not be able to stand again.</p> <p>Vehicle movements can also cause livestock to slip and fall. The likelihood of this occurring is increased if effluent accumulates on the floor of the vehicle.</p>	<ul style="list-style-type: none"> • The driver should ensure the vehicle is clean, free of effluent, in good condition and fully operational before loading livestock. • Livestock should be prepared for transport by ensuring feed and water curfews are adhered to. This prevents the build-up of effluent in a vehicle. • Livestock should be loaded with appropriate segregation (refer to the Livestock Transport Standards and Guidelines). • Drivers should regularly monitor effluent build-up in vehicles and effluent tanks, and empty tanks as required and manage effluent build-up in trucks during rest periods. • Drivers should regularly monitor the livestock being transported, paying attention to their health, welfare and general condition. Any compromise of the health, welfare or condition of stock should be appropriately managed by the driver. • Tanks should have adequate capacity to capture effluent for the number of stock loaded on a vehicle and the amount of effluent that may be produced. • Livestock should be loaded at appropriate stocking rates for the vehicle they are being transported on. Underloading or overloading

			<p>both compromise the health and welfare of the stock being transported. Appropriate stocking densities provide livestock with stability during transport, which lessens the likelihood of injury and falls.</p>
Staining or soiling of fleece/fur/hides	M	Effluent accumulation may lead to faecal matter staining or soiling the fleece, fur or hides of the livestock being transported.	<ul style="list-style-type: none"> • The driver should ensure the vehicle is clean, free of effluent, in good condition, fit for purpose and fully operational before loading livestock. • Livestock should be prepared for transport by ensuring feed and water curfews are adhered to. This prevents the build-up of effluent in a vehicle. • Drivers should regularly monitor effluent build-up in vehicles and effluent tanks, and empty tanks as required and manage effluent build-up in trucks during rest periods. • Drivers should regularly monitor the livestock being transported, paying attention to their health, welfare and general condition. Any compromise of the health, welfare or condition of stock should be appropriately managed by the driver. • Tanks should have adequate capacity to capture effluent for the number of stock loaded on a vehicle and the amount of effluent that may be produced. • Livestock should be loaded at appropriate stocking rates for the vehicle they are being transported on.

Hazard: 3. Animal Welfare			
Risk	Likelihood	Consequence	Controls
	L= Low M= Medium H = High	Consider: <ul style="list-style-type: none"> • Safety • Environmental • Infrastructure • Financial • Reputation 	Hierarchy: <ul style="list-style-type: none"> • Remove the hazard • Substitute with something safer • Change the way the activity is carried out • Implement policies and procedures
Feed, water and rest considerations	M	<p>Not following feed, water and rest conditions compromises the health and welfare of livestock during transport. This can have flow-on affects, such as less money received for stock when they are either sold or processed.</p> <p>It is important for effluent management that the water and feed curfews are adhered to as they are outlined in the Land Transport of Livestock Standards and Guidelines (2012).</p> <p>Animal welfare should not be compromised for the sake of minimising effluent</p>	<ul style="list-style-type: none"> • Adhere to the Land Transport of Livestock Standards and Guidelines (2012) which identify the classes of livestock (excluding poultry) that are expected to travel for a long duration and approaching the maximum water deprivation time for the livestock class. These classes of livestock are: <ul style="list-style-type: none"> ○ Pregnant livestock, livestock that have recently given birth, are lactating or with young at foot, ○ Immature livestock as defined for each species, ○ Livestock that are unaccustomed to handling, ○ Livestock that are stressed or fatigued from mustering or handling, ○ Weak livestock. • Livestock should be loaded with appropriate segregation (refer to the Livestock Transport Standards and Guidelines). • Livestock should be loaded at an appropriate stocking density for the class of livestock and the vehicle they are being transported on (refer to the Livestock Transport Standards and Guidelines). • Livestock should be spelled when required (refer to the Livestock Transport Standards and Guidelines).

		production and accumulation in vehicles beyond what is acceptable practice.	<ul style="list-style-type: none"> • Livestock should be fed and watered as soon as possible once unloaded, with caution being paid to hungry stock being introduced onto lush pastures or feed they may be unaccustomed to.
Loading densities	M	Appropriate loading densities should be adhered to. Stocking densities should be calculated based on the class of stock being transported, their physiological state, age, handling exposure, and general health and wellbeing. Livestock must be in appropriate condition to travel.	<ul style="list-style-type: none"> • The person loading the stock should inspect the stock prior to loading. • Livestock must meet the requirements prescribed under the Fit-to-Load Guide • Livestock should be in suitable condition for the journey they are undertaking. • Livestock should have had appropriate feed and water prior to travelling, within the standards and guidelines for feed and water curfews. • Ensuring an adequate number of livestock are loaded provides stability during the journey and reduces the risk of injury due to movements of the vehicle. • Livestock should not be overloaded or underloaded as both compromise the welfare of the livestock. Overloading is worse than underloading. • Livestock should not be underloaded to minimise effluent accumulation.