

## Improving awareness and practices in the livestock supply chain

**Issues Paper** 

March 2020

## Report Outline

| Title          | Improving awareness and practices in the<br>livestock supply chain<br>March 2020   | Contact | National Heavy Vehicle Regulator<br>PO Box 492<br>Fortitude Valley<br>QLD 4006<br>Ph: 1300 696 487 |
|----------------|--|---------|--|
| Type of report | Issues Paper   |         |  |
| Purpose        | For public consultation  |         |  |
| Abstract       | The National Heavy Vehicle Regulator<br>(NHVR) is conducting a Livestock Supply<br>Chain Review to understand the challenges,<br>knowledge and risk mitigation strategies<br>used by participants in the livestock supply<br>chain to meet regulatory responsibilities<br>under the Heavy Vehicle National Law<br>(HVNL), with a particular focus on mass<br>management. |         | Email: info@nhvr.gov.au<br>www.nhvr.gov.au   |



## Have your Say

### Submit your advice

The NHVR wants to provide everyone involved in the livestock supply chain with an opportunity to have their say on what's working well, what's not working, and what could be changed to improve safety and productivity outcomes.

The NHVR invites participants in the livestock supply chain to submit responses to the questions included in Section 7 of this issues paper and/or offer other feedback to assist in the development of recommendations to improve safety and/or productivity outcomes across the livestock supply chain

### Submissions process

Any individual or organisation can make a submission to the NHVR.

All submissions will be made publicly available (unless explicitly requested otherwise).

The NHVR reserves the right to withhold any part of a written submission that is outside the scope of this issues paper.

Submissions can be emailed to info@nhvr.com.au or posted to:

National Heavy Vehicle Regulator Public submission – Livestock Supply Chain Review PO Box 492 Fortitude Valley Queensland 4006

### **Deadline for submissions**

Submissions must be received by the NHVR no later than 5pm on **Friday 24 April 2020**.



## Contents

| Report Outline   | 2  |  |
|--|----|--|
| Have your Say  | 3  |  |
| Executive Summary  | 5  |  |
| Introduction   | 6  |  |
| Background   | 6  |  |
| Purpose  | 6  |  |
| Objectives   | 6  |  |
| Scope  | 6  |  |
| Context for review   | 7  |  |
| Transport in the livestock supply chain  | 7  |  |
| Other parties in the livestock supply chain                                      | 7  |  |
| Animal Welfare   | 7  |  |
| Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock | 7  |  |
| Tools available to assist loading density and mass management                    | 8  |  |
| Current livestock supply chain practice  | 8  |  |
| Primary producers  | 8  |  |
| Saleyards and Livestock Agents   | 8  |  |
| Feedlots and Abattoirs   | 9  |  |
| Livestock transport operators  | 9  |  |
| Live Export  | 9  |  |
| Risk Mitigation  |    |  |
| Summary of issues  | 10 |  |
| Questions  |    |  |



## **Executive Summary**

The livestock supply chain is a multibillion dollar industry that is pivotal to Australia's regional economies and contributes significantly to its export trade.

Following an increase in the number of livestock mass breach notices issued, the NHVR has decided to undertake a livestock supply chain review focusing on sheep and cattle transport to improve awareness and practice of mass management by participants in the livestock supply chain.

This issues paper has been informed by more than 30 livestock supply chain participants during a four-month consultation period. It identifies the challenges, knowledge and risk mitigation strategies they use to manage their regulatory responsibilities under the HVNL.

The scope of this issues paper includes all parties, processes, procedures and risk mitigation methods involved in the transport of cattle and sheep by road from the farm gate to the final destination in all states and territories other than the Northern Territory and Western Australia. It does not address livestock loading schemes, livestock infrastructure assessment, effluent management, legislative reform or fatigue management.

The livestock supply chain is unlike any other. Livestock condition and value can be affected by the journey, which is different from other freight tasks. Livestock transport operators have to factor in animal welfare standard obligations in addition to their HVNL responsibilities. Livestock can move within a trailer, and animal health can be affected over the duration of travel. Movement of animals presents axle mass challenges, with some drivers reporting that they frequently move between being compliant and non-compliant when approaching mass limits, particularly in New South Wales.

Difference in experience, equipment, process and infrastructure contributes to mass issues in the supply chain. Some drivers feel pressured by non-transport participants to transport the full load of livestock, which may breach mass limits. Drivers are more likely to take on this risk in situations where they believe future contracts may be at risk if they refuse.

Onboard mass management equipment is not universally employed across the current livestock transport fleet. This, combined with varying sheep and cattle weighing practices out of different facilities and properties—results in a supply chain that relies heavily on the experience of the driver to manage mass limit compliance.

Some members of the supply chain were also unaware or had limited knowledge of their HVNL obligations when asked how

they were managing their risk. Most supply chain members believed road transport operators should manage mass management risks.

Overall, the NHVR considers that the majority of supply chain participants are trying to do the right thing in a complex situation and welcome the opportunity to review current practices.

As this issues paper represents the views of only a small cross section of the livestock supply chain, the NHVR would appreciate the views of other livestock supply chain participants on how safety and productivity outcomes of the supply chain could be improved

### Primary duty in the HVNL

- Each party in the chain of responsibility for a heavy vehicle must ensure, so far as is reasonably practicable, the safety of the party's transport activities relating to the vehicle.
- 2. Without limiting subsection (1), each party must, so far as is reasonably practicable-
  - a. eliminate public risks and, to the extent it is not reasonably practicable to eliminate public risks, minimise the public risks; and
  - b. ensure the party's conduct does not directly or indirectly cause or encourage
    - i. the driver of the heavy vehicle to contravene this Law; or
    - ii. the driver of the heavy vehicle to exceed a speed limit applying to the driver; or
    - iii. another person, including another party in the chain of responsibility, to contravene this Law.
- 3. For subsection (2)(b), the party's conduct includes, for example
  - a. the party asking, directing or requiring another person to do, or not do, something; and
  - b. the party entering into a contract
    - i. with another person for the other person to do, or not do, something; or
    - ii. that purports to annul, exclude, restrict or otherwise change the effect of this Law.

### What we need from you

The NHVR has undertaken consultation with more than 30 groups across the livestock supply chain. The NHVR is now seeking feedback from the rest of industry. A series of questions is provided at page 11 to assist with feedback.

As a result of information provided, the NHVR will identify issues that need to be addressed and provide recommendations for improvements.

### Introduction

The NHVR is Australia's regulator for all heavy vehicles over 4.5 tonnes gross vehicle mass. It was established in 2013 as a statutory authority pursuant to the HVNL and commenced operations in February 2014. The NHVR administers the HVNL in the Australian Capital Territory, Queensland, New South Wales, South Australia, Tasmania and Victoria. The Northern Territory and Western Australia operate outside of the HVNL and have their own transport regulation to manage heavy vehicle transport within their jurisdictions.

The NHVR currently has more than 350<sup>1</sup> employees and contractors in the ACT, Queensland, South Australia, Tasmania and Victoria.

Since its inception, the NHVR has established a direct regulatory relationship with:

- more than 40,000 road freight businesses that collectively own over 900,000 heavy vehicles
- over 450 road managers (including local government and private road owners)
- six participating jurisdictions.

This issues paper is part of the NHVR's commitment to working with industry to identify best in meeting regulatory obligations to support safe and productive road transport operations in the livestock supply chain.

### Background

Australia is one of the fastest-growing countries in the world, with its population projected to grow from 25 million at present to 30 million between 2029 and 2033.<sup>2</sup> This population growth also increases food demand, including meat products. The increased demand for Australian meat is occurring on a domestic and international front, resulting in a growing transport task.

The Australian livestock industry directly and indirectly employs 404,800 people across 80,300 businesses and had a turnover of \$65.8 billion in 2017-18.3 During this period, red meat and livestock exports (including co-products) totalled approximately \$15 billion.<sup>4</sup> Australia was the largest sheep meat exporter and the third largest exporter of beef globally in 2018.<sup>5</sup>

In 2018, 40.1 million cattle and sheep (and lamb) were transported for slaughter.<sup>6</sup>

Transporting livestock is time sensitive, with producers and buyers wanting fast and efficient transport to market. In Queensland, rail is still offered as a transport mode from regional locations to some abattoirs; however, the vast majority of cattle and sheep for slaughter are delivered by road in Queensland and throughout the rest of Australia. Road transport operators are required to meet the legislative requirements under the HVNL, as well as animal welfare requirements, which are outside of the HVNL and the NHVR's responsibilities.

The livestock supply chain is complex and involves a number of participants performing different roles. Participants vary in size and sophistication, from single operators who perform a single task, to large-scale, integrated businesses that perform all tasks,

including producer, transporter, manufacturer and exporter. The livestock supply chain is very efficient, in that the animals move seamlessly through the chain from origin to destination. However, it has become evident that some members of the supply chain are challenged by their obligations defined under the HVNL, which has resulted in an increase in heavy vehicle mass breaches.

The transport of livestock is the biggest variable in the supply chain. Unlike other forms of freight, livestock can move during transport, which can affect the ability to manage individual axle weights. Livestock can gain or lose weight over the course of the journey, they produce effluent and can be affected by the weather, which can affect their health and wellbeing. Other factors, such as length of journey, condition prior to travel, loading density and time of year, can also affect animal welfare and, ultimately, the value of the animal at point of sale.

The livestock road freight task is only 4% of the national freight task; however, livestock crashes account for over 10% of the total with 60% of rollovers involving livestock loadings (due to the high centre of gravity combined with moving stock).<sup>7</sup>

### Purpose

The purpose of the Livestock Supply Chain Review is to identify the relationship, influences, understanding and capabilities of the parties who affect the safety and productivity of livestock supply chain road transport movements. Through the submission process the NHVR will evaluate current industry practices and risk mitigation strategies and use this information to help participants better manage their responsibilities under the HVNL.

### **Objectives**

The objectives of this issues paper are to:

- · identify each party's understanding of their role and responsibility in the livestock supply chain
- · review the decision-making process and influencing factors for loading, transporting and receiving livestock (e.g. the methodology used for how many are loaded onto a vehicle, existing systems, processes, structures, relationships, knowledge and capabilities etc.).

### Scope

The scope of this issues paper includes all parties, processes, procedures and risk mitigation methods involved in the transport of cattle and sheep by road from the farm gate to the final destination in all states and territories other than the Northern Territory and Western Australia.

Not included in the scope of this issues paper are:

- livestock loading schemes
- livestock infrastructure assessment
- effluent management
- legislative reform
- fatigue management.

Permanent, maximum-term contract, temporary and non-payroll contractors.

Australian Bureau of Statistics Cat 3222.0 Population Projections Australia (latest issue released November 2018).

<sup>3</sup> Meat and Livestock Australia. (2019). State of the industry report 2019: The Australian red meat and livestock industry. Retrieved from https://rmac.com.au/policy-leadership/state-industry-2018/ 4 ibid

<sup>5</sup> ibid

ibid National Transport Insurance. (2017). 2017 Major accident investigation report. Covering major accidents in 2015. Retrieved from www.nationaltransportinsurance.com.au/getmedia/1b167e3e-b00a-4569-b30f-6e3a2b0dd328/2017-ntarc.pdf?ext=.pdf

## **Context for review**

### Transport in the livestock supply chain

Every year, millions of head of cattle and sheep are transported across Australia by road to various intermediate and end destinations. The distances between properties and processing plants are often vast and cross state and territory borders. Transporting animals is performed by various transport combinations, ranging from small rigid trucks to large multicombination road trains.

The average journey of livestock from farm gate to processor is estimated to be over 500km.<sup>8</sup> This journey can involve numerous stops and transfers between feedlots, saleyards and vehicles (to meet mass restrictions in different states) and for spelling (as stipulated by Animal Welfare Guidelines).

The task of transporting livestock throughout the supply chain is complicated by competing economic priorities of different participants looking to maximise their investment. The purchase price of the livestock can vary substantially depending upon the treatment of the animal from origin to destination. Livestock subjected to challenging transport conditions may not optimise the sales price at time of slaughter. The desire of the participants in the livestock supply chain to maximise price may result in transport decisions that may not always be safe or consistent with the requirements of the HVNL.

To help understand these challenges, the NHVR is seeking input from livestock supply chain participants to gain insight into operational practices and decision-making processes for the handling and transport of animals.

### Other parties in the livestock supply chain

For the purposes of this issues paper, the NHVR is focusing on the livestock supply chain from producer to end destination (classified as slaughter or export) as illustrated per Figure 1. In particular, this issues paper identifies the influencing factors that affect livestock transport. It should be noted that the sheep and cattle livestock supply chain are very similar; however, mass management of sheep is more challenging, as sheep are rarely weighed before transport.

The NHVR acknowledges that time spent in the livestock supply chain varies depending upon the age of the animal and the task at hand. By the time they reach their end destination, cattle or sheep may have been handled by a number of participants and changed ownership several times. Each participant handling the livestock has an obligation to meet all the relevant requirements under the HVNL, as well as other shared animal welfare responsibilities as defined by Animal Health Australia.



Figure 1 – Livestock Supply Chain<sup>9</sup>

## **Animal Welfare**

### Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock

Animal Health Australia developed Australian Animal Welfare Standards and Guidelines - Land Transport of Livestock (the standards) to ensure the welfare of livestock during land transport. The standards provide "the basis for developing and implementing consistent legislation and enforcement across Australia, and guidance for all those responsible for livestock during transport."<sup>10</sup>

"The standards apply to all those responsible for the care and management of livestock that are transported, including drivers, transport companies, owners, agents and livestock handlers at farming enterprises, depots, saleyards, feedlots and livestock-processing plants. The chain of responsibility for livestock welfare in transport begins with the owner or their agent, and extends to the final receiver of the livestock."<sup>11</sup>

The standards outline requirements to minimise risk to animals during live transport, and include loading density and requirements for maximum time with no food or water.

The standards state that managing these risk factors is a "shared responsibility between all the people involved, including owners, managers, handlers, agents and drivers"<sup>12</sup> and that "From an animal welfare perspective, land transport of livestock is a process that begins before the physical journey on either road or rail, and only ends some time after this physical journey is complete."<sup>13</sup> The standards and the HVNL are aligned in the concept of shared responsibility, and both require participants in the livestock supply chain to manage their obligations.

<sup>8</sup> Outback Communities Authority and Regional Development Australia Far North (2018) Multispecies Livestock Transhipping Hub: Improving safety, efficiency and profitability in the Australian Livestock Industry South Australia

<sup>9</sup> CSIRO diagram, adapted from: Outback Communities Authority and Regional Development Australia Far North (2018) Multispecies Livestock Transhipping Hub: Improving safety, efficiency and profitability in the Australian Livestock Industry South Australia p.9

<sup>10</sup> Animal Health Australia (AHA), 2012. Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock. Canberra. p.1

<sup>11</sup> Ibid p.1. 12 Ibid p.4

<sup>13</sup> Ibid p.3.

## Tools available to assist loading density and mass management

### Meat & Livestock Australia (MLA) – "Is the animal fit to load?"

MLA has developed a national guide to the pre-transport selection and management of livestock to help livestock operators meet the Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock. Is the animal fit to load specifically addresses the preparation of animals for transport. A loading density section summarising recommendations in the standards is included in a reference table. The guide references responsibilities as they relate to animal welfare but does not make mention of loading responsibility under the HVNL. See mla.com.au/publications and www.mla.com.au/meat-safety-and-traceability/red-meatintegrity-system/red-meat-integrity-systems-newsletter/is-yourlivestock-fit-to-load/<sup>14</sup>



### NSW Roads and Maritime Services (RMS) – Livestock loading calculator

The RMS livestock loading calculator is a tool that allows operators and other responsible parties to estimate their load depending upon vehicle type and livestock being transported to assist with compliance with the NSW Livestock Loading Scheme mass limits. The calculator is a macro-based Excel spreadsheet and so has limited application on a smart phone that is not configured with the correct software and extensions. This limits the utility, generally to desktop use at transport operators' office locations and requires details of the load prior to use.

# Current livestock supply chain practice

Over the last few months the NHVR has been meeting with various members of the livestock supply chain and has observed the following practices.

### **Primary producers**

Primary producers range in size from small family farms to large corporate enterprises that grow livestock to customer specification. These corporate farms breed and produce thousands of head of sheep and/or cattle every year. The sale of livestock can be influenced by a range of factors, including availability of feed and water, livestock prices, foreign exchange rates, cost of feed and weather conditions (e.g. drought). Livestock sales from primary producers can be direct to feedlots for fattening, to abattoirs or through saleyards, and may be facilitated by agents. Transport is either organised by the primary producer, a livestock agent or the purchaser.

Infrastructure and weighing equipment vary in availability and sophistication among primary producers. For transport, livestock mass is either estimated or calculated using scales. If scales are not available, experience is relied on to estimate mass. This can result in an overestimation or underestimation of the mass. Anecdotally, it is estimated that approximately 50% of primary producers have the ability to weigh livestock.

Where scales are not available, primary producers, transporters or abattoirs organising transport from the breeding property estimate weight by using a combination of factors, such as number of sheep or cattle, breed, age and average historical weight. An experienced operator is able to estimate how many animals can be loaded. However, if the estimation is incorrect, then the livestock transporter could exceed mass limits and be subject to an infringement notice. The transport operator could also decide that the load exceeds the mass limit, and then be faced with a difficult decision to either load or not load the number of livestock they have been contracted to carry.

### Saleyards and Livestock Agents

Saleyards play an important role in the rural economy. They promote economic activity by creating and sustaining jobs associated with the livestock industry. There are 174 operating saleyards across Australia. They vary in size and throughput, and predominantly cater for sheep and cattle sales. They can be owned by councils or privately owned and operated.

Saleyards provide the physical infrastructure and location for the livestock sales to take place. They also receive livestock for spelling when travelling long distances. The saleyards consist of various holding pens, where livestock are held for auction. The saleyards are managed by livestock agents, who also manage the sale of the livestock.

Cattle are penned by weight class, which is estimated by the livestock agent. Numerous pens from the saleyard can make up one load, which can make calculating average and total weight difficult. The livestock agent will coordinate with the transport operator to transport the livestock load once sold.

14 Meat and Livestock Australia (2019). Is the animal fit to load? A national guide to the pre-transport selection and management of livestock. Retrieved from https://publications.mla.com.au/login/ redirectFrame Generally, cattle are not weighed before sale but are weighed prior to transport from the saleyard. The individual weight of cattle can vary considerably, which makes it difficult to manage mass axle weight groupings.

Adult sheep are not weighed, and lambs are sold on a per head price. Mass management is estimated by the driver, unless on-board mass management equipment is available in the vehicle. Consultation suggests livestock agents have limited interest in managing load mass and rely on drivers to make the final decision regarding load mass management.

While saleyards facilitate the sale of livestock by providing the infrastructure (pens, ramps and scales), they also have the ability to impact compliance as highlighted above.

Some, but not all, saleyards conduct induction programs educating saleyard users on their HVNL obligations and provide signage around the saleyard facility.

### **Feedlots and Abattoirs**

Feedlots play an important role in the livestock industry by providing facilities to fatten cattle and sheep for premium markets. This is achieved by way of intensive grain feeding to increase weight. There are 390 National Feedlot Accreditation Scheme (NFAS) feedlots in Australia, with capacity ranging from 500 to 50,000+ head of cattle, with 96% of feedlots being family owned.<sup>15</sup>

Cattle are weighed on entry into feedlots to determine how many days they are required to be on feed to reach the contracted weight. Feedlots weigh sheep and cattle prior to transport to the abattoir, and have an accurate measure of weight for loading onto vehicles and to calculate slaughter weight. Feedlots load the volume of cattle or sheep for transport as ordered by the abattoir. Generally, transport operators can load livestock to their Gross Vehicle Mass; however, they may still struggle to comply with legal axle weights due to the movement of livestock in transit.

### Livestock transport operators

Livestock transport operators vary in fleet size across Australia, ranging from single truck operators to large commercial fleets offering multiple vehicle combinations. Livestock transport connects all parties in the supply chain. Load mass management is either centrally planned in large livestock transport operations, or by drivers or owner operators at the time of loading.

Paperwork regarding livestock weight may or may not be available. For transport from saleyards, when multiple pens of cattle at different weigh classes are to be transported, it becomes a much harder task to estimate weight if no onboard mass management is available. As sheep are not generally weighed, and if no on-board mass management is available, then there is a heavy reliance upon transport operators' experience to determine the correct load and mass management plan.

Owner operators or smaller livestock operators are more susceptible to pressure from other participants in the supply chain to carry the load on offer or risk losing future work if they do not transport what is being requested. Larger operators generally have better capacity to pick up livestock left behind by drivers for delivery.

Risk management for managing mass is mainly based on driver experience or adhering to transport planning from the operations centre for the transport business. Transport operators have the most exposure to HVNL breaches, as drivers are the most likely to be intercepted.

### **Live Export**

The livestock export industry is worth over \$800 million each year and supports the livelihood of many people in rural and regional Australia.<sup>16</sup> Livestock is transported by road to ports, where they are loaded on board livestock vessels for export. Animal welfare management is crucial to ensuring livestock is loaded with minimal stress to the animals.

As with transport to other points in the supply chain, road transport operators of livestock for export are required to manage mass and fatigue management under the relevant jurisdictional law.

## **Risk Mitigation**

The risk mitigation strategies used to manage mass can vary substantially from stakeholder to stakeholder. In relation to managing their HVNL obligations, participants' risk mitigation strategies range from passive (everyone else's responsibility) to proactive, where various initiatives are undertaken to increase awareness of HVNL responsibilities and comply with statutory obligations.

The strategies are based largely on the interpretation and perceived role of mass management in livestock transport. The knowledge and acceptance of roles can be inconsistent, even within the same stakeholder group (e.g. among different saleyards or primary producers).

For example, during consultation it was identified that some saleyards have detailed strategies in place, such as online inductions for regular saleyard users, and prominent signage in and out of saleyards and at ramps. Other saleyards, however, have limited mass management education or signage, and believe mass management to be the driver's responsibility. Risk mitigation can only exist where participants are aware of their role in the risk being managed, and the variance in risk mitigation seen among saleyards is a common feature among other livestock participants.

During the consultation period, many supply chain participants were unaware of their roles and responsibilities with regard to mass management under the HVNL. When they realised they were a responsible party, they were motivated to understand their role and responsibilities and how they could mitigate their risk.

The Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock is an example of how the livestock supply chain does mitigate risk when the shared responsibility for a task is known and accepted.

15 Australian Lot Feeders Association. (2019) A year in review. Retrieved from https://docs.wixstatic.com/ugd/f25d7a\_39bdaa0e91444c0d80a4a84c7d00e295.pdf

16 www.agriculture.gov.au/animal/welfare/export-trade



## Summary of issues

- Not all parties in the livestock supply chain are aware of their HVNL regulatory obligations.
- Not all parties in the livestock supply chain are held accountable or are breached for non-compliance events.
- Final destination participants have limited knowledge of their HVNL responsibilities.
- Saleyards across Australia vary in size, resources, function and operating periods-resulting in infrastructure and resource variances that complicate the loading task-making it difficult to implement a consistent approach.
- Due to the vast number and variation in size and sophistication of supply chain participants, there is a large variance in systems and processes deployed to meet HVNL obligations, from documented processes to implied understanding.
- Variability in jurisdictional livestock loading schemes adds to the complexity of managing mass for drivers travelling across multiple jurisdictions.
- There is a heavy reliance on experience to determine correct loading plans.
- Deviances in level of detail surrounding load composition central transport organisation vs owner/operator organised.
- Limited visibility of weight at certain points of the supply chain.
- Limited tools available to drivers to estimate average weight when loading trailer.
- Primary producers don't always know correct weight of livestock.
- Education is needed to change the 'next person is responsible' attitude.
- Overloading occurs because of the following:
  - average size of beast is higher than estimated
  - $-\,$  inconsistent information regarding weight of livestock
  - variance in operator experience impacts accuracy of rule of thumb

- limited knowledge and difference in understanding of livestock loading schemes
- different vehicle capabilities and weights
- limited control over which livestock exits pen and enters truck first, which impacts weight over axles
- contract time pressure
- primary producer pressure
- 'willing to take risk'
- considered to be a cost of doing business if breached
- competitor pressure (i.e. if I don't do it they will).

### Why does overloading occur?

- Average size of beast is larger than estimated
- Inconsistent information regarding weight of livestock
- Variance in operator experience impacts accuracy of rule of thumb
- Limited knowledge and difference in understanding of livestock loading schemes
- Different vehicle capabilities and weights
- Limited control over which livestock exits pen and enters truck first which impacts weight over axles
- Contract time pressure
- Primary producer pressure
- 'willing to take risk'
- Considered to be a cost of doing business if breached
- Competitor pressure i.e. if I don't do it they will

## Questions

The NHVR invites your comments on the issues paper by responding to the below questions.

### **Question 1:**

What are the key issues that have not been identified in this issues paper in relation to livestock supply chain practices?

### Question 2:

What approach would you recommend to improve stakeholder awareness of regulatory responsibilities under the HVNL in the livestock supply chain?

### **Question 3:**

What do you believe to be reasonably practical measures and processes to meet your regulatory responsibilities under the HVNL?

### **Question 4:**

What other tools/education/equipment/technology would be practiced and help parties to meet their regulatory responsibilities under the HVNL?

### **Question 5:**

What loading practices would you recommend to improve your understanding of your mass management risk?

### Question 6:

How is your HVNL responsibility impacted by other participants in the livestock supply chain?

### Question 7:

What additional steps could the NHVR take to encourage participants of the livestock supply chain to meet their regulatory responsibilities under the HVNL?

### **Question 8:**

What risk mitigation strategy to better manage mass can be offered that has not been identified in this issues paper?

### How the issues brief was informed

In formulating this issues paper, the NHVR has consulted with industry via individual meetings, phone calls and attendance at prominent industry events (e.g. through the NHVR Industry Operations Group Livestock meeting and at the Australian Saleyards 2019 Expo). Additionally, the NHVR interviewed livestock transport drivers at saleyards to identify challenges and opportunities to address mass management issues.

While consultation has taken place, the examples given in this issues paper do not form a complete overview of all the opinions of, and strategies, policies and procedures employed by, the livestock supply chain.

The following were consulted in the development of this issues paper:

- Agforce
- Animal Health Australia
- Australian Livestock & Property Agents Association (ALPA)
- Australian Livestock & Rural Transporters Association
  (ALTRA)
- Australian Livestock Markets Association (ALMA)
- Australian Livestock Saleyards Association (ALSA)
- Australian Saleyards Expo Attendees: Roma 24-26 July 2019
- Beef City Feedlot
- Department of Argiculture and Fisheries
- Dubbo Saleyards
- Fletcher International Exports
- Forbes Saleyards
- Frasers Livestock Transport
- JBS Carriers
- Livestock, Bulk and Rural Carriers Association NSW (LBRCA)
- Livestock and Rural Transporters Association of Queensland (LRTAQ)
- Livestock & Rural Transporters Association of SA (LRTASA)
- Livestock & Rural Transporters Association of Victoria (LRTAV)
- Livestock Transporters Association of Tasmania (LTAT)
- Livestock & Rural Transporters Association of Western Australia (LRTAWA)
- McCarron, Cullinane and Chudleigh
- Meat and Livestock Australia
- Neil Morrison Livestock and Grain Transport
- NH Foods
- NHVR IOG attendees: Brisbane 19 July 2019
- O'Sullivans Livestock Transport
- Roma Saleyards
- Sheep Producers Australia
- Teys Australia
- Transdel Livestock Carriers
- Warwick Saleyards
- Wool Producers Australia