# Submission to the National Heavy Vehicle Regulator (NHVR) Review of Livestock Mass, Dimension and Loading Arrangements

Animals' Angels Australia (AAA) is nationally respected as a key stakeholder in the saleyard and transport industries. Our charter in Australia is to monitor animal congregation points for both short and long distance transport. We are the only non-government organisation in Australia that actively and routinely monitors these industries nation-wide. Over the last 20 years, we have comprehensively and professionally observed and reported, to the appropriate authorities and industry, non-compliance with relevant legislation and applicable Australian Animal Welfare Standards and Guidelines.

From extensive on-ground industry experience AAA has developed a sound understanding of the regulatory environment that operates in the farming sector in Australia. Much of our work has been focused on the transport sector and is directly relevant to the questions posed in the NHVR's June 2022 discussion paper. We offer the following responses for consideration by the NHVR.

**Section 7: The regulation of conditions within an HVNL Notice**

**Question 4 – Considering the respective roles of the HVNL/NHVR, and those other laws (e.g. for animal welfare protection) and their state and territory regulators (transport agencies or otherwise) - which of the two options would be best?**

We support any measures that enhance the consistency of requirements across Australia. Guidance on animal density is provided in the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (LTS). This guidance is replicated in the "Is the animal fit to load?" (FTL) guide. We request that certainty be provided that the LTS and FTL are the underpinning documents across Australia for any requirements developed as part of this review.

We wish to note that the pen densities in the LTS and FTL are not based on science. They were influenced largely by financial considerations rather than animal welfare. However additional scientific advice should be obtained before wavering from the LTS and FTL to help ensure consistent implementation across Australia.

Research to assess the appropriate density of sheep in a transport vehicle has shown that the lower the density the better the sheep travel (Jones et al 2010). Implications for the transport industry are that taking any opportunity to reduce stocking density on a truck will be good for animal welfare. AAA is aware of arguments that exist amongst industry participants that 'packing animals in' protects them from harm. Our experiences, and the scientific evidence, do not support this contention at all.

**Question 5 – Is there evidence to support safer outcomes of mandating livestock loading driver training? Or are workplace health and safety laws, and the HVNL general safety duty adequate to ensure drivers are appropriately trained and skilled?**

The standard approach to achieving a raised level of awareness and compliance in society is by training and accreditation/licensing. The diverse nature of the transport industry makes such an approach the only reasonable option, in our view, to achieving meaningful behavioural change. Anything less will deliver a lesser outcome.

Training in regulatory responsibilities could be enhanced by including improved driver awareness of how to manage rollover risk for livestock trucks. Such training should include specific components on optimal loading practices for livestock to help overcome the issue of lack of precision when estimating animal weights.

We suggest drawing upon the experience of others, such as authorities in Europe, where there is an established system for accreditation of drivers for loading of trucks and livestock welfare competence.

**Reference**
Jones TA, Waitt C and Dawkins MS (2010) Sheep lose balance, slip and fall less when loosely packed in transit where they stand close to but not touching their neighbours. Applied Animal Behaviour Science 123; 16-23.

Animals' Angels Australia
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