# AUSTRALIAN RURAL EXPORTS PTY LTD

ACN 009 933 831 ABN 49 009 933 831



# AUSTREX SUBMISSION ON THE IIGLAE REVIEW: Monitoring & reporting during livestock export voyages

The central deficiencies of current vessel monitoring and reporting are general inefficiency and ineffectiveness. The specific key issues for AUSTREX are Independent Observer (IO) allocation, vessel transparency and data application.

#### **Independent Observer allocation**

The current system of IO use is variability effective with significant financial and logistical cost. AUSTREX strongly advocates for the move from compulsory IOs to a **risk and performance based system** (see Appendix 1 for suggested matrix). For the government to successfully force industry improvement, implications need to be placed on recalcitrants rather than impeding high performers.

The key shortfalls of current mandatory IO use include:

- × Significant cost to exporters with little gain as the reports of IOs are not returned in a timely enough manner to effect relevant change (Current average wait time of 6 months between voyage conclusion and report release). AUSTREX also suggest IOs provide a 1 page summary immediately at voyage conclusion to allow timely continuous improvement.
- × Extensive duplication between IO reporting and what can be completed with a thorough RVO inspection before departure (eg: cattle loaded at correct density, hospital pens empty, loading welfare, cattle condition, individuals fit to be loaded) and mandatory daily AAV/stockmen reporting (eg: cattle mortality, morbidity and condition, environmental parameters).
- × Impossibility to train new stockmen and AAVs as the IO takes up the last available accommodation.
- × Detrimental welfare outcomes when poor quality IOs have contradicted experienced cattle managers, including the AAVs regarding best practice cattle management.

The key benefits of moving to a risk and performance based system include:

- ✓ Incentivises a culture for continuous improvement.
- ✓ Increased cost-efficiency for high performing exporters, allowing increased re-investment into cattle management and preparation that is better proven to improve animal outcomes.
- ✓ Allows more effective use of limited department time and personnel resources.
- ✓ Reduced pressure on the very small pool of quality IOs, therefore allowing use of only IOs with extensive export experience and/or livestock veterinary qualification. In AUSTREX's experience these are the IOs with true positive impact.

### **Vessel transparency**

After IO allocation overhaul, refining voyage reporting to increase vessel transparency is another key strategic area to improve monitoring effectiveness and therefore health and welfare outcomes.

As an industry we need to investigate options for **independent environmental monitoring technology** to create a **data stream that is lodged without bias**. If there is an option for this to be combined

1

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in a centralised repository and managed by a body such as Livecorp, there may be significant benefit in mitigating the two central vessel risks of ventilation/heat control and water supply.

As part of this goal of increased vessel transparency, the industry should also consider the benefits of welfare auditing livestock vessels (in addition to their AMSA accreditation), prior to their maiden voyage and renewed on a biannual basis or if there has been repeated onboard issues. Key focus of theses audits should again include quality and reliability of ventilation and water supply, in addition to fodder storage and supply, pen flooring, cattle movement infrastructure (ramps and alleyways) and livestock crew.

# **Data application**

Finally, for voyage monitoring and reporting to have actual purpose, we as an industry, need to ensure that the data collected (at significant time and financial cost) is **utilised to catalyse meaningful change**. There is already more than 10 years of DAWR voyage reporting data and 18 months of IO videos, images, checklists and reports. Targeted analysis of this data to utilise the significant statistical power of such an extensive sample size should effectively identify fundamental voyage risks and allow **key industry benchmarks and KPIs** to be established.

From our basic understanding of the data the risks of maiden voyages, irregular/inexperienced exporters (or exporters inexperienced to that particular voyage type), vulnerable cattle type (heavy bulls, excessively heavy cattle) and inadequate preparation (time and cattle management) cannot be overlooked. In essence, the data and knowledge already exists, this is the opportunity for it to be harnessed, allowing the department to operate in a more preventative state of regulation.

#### Summary

In conclusion, it needs to be recognised that risk mitigation is based on **exporter and vessel experience** and **sound cattle preparation**. Nothing can replace good, experienced stockmen, AAVs and vessel personnel or proactive exporters putting in place their own Standard Operating Procedures for best practice cattle management and preparation. As an industry we need to incentivise continuous improvement by **rewarding ongoing high performers and moving to preventative risk management.** 

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# APPENDIX 1: SUGGESTED RISK AND PERFORMANCE BASED SYSTEM FOR IO ALLOCATION

- IOs are allocated to consignments based on risk and ongoing exporter performance.
- New exporters shall be allocated IOs for at least their first 5 voyages (including at least 1 long-haul).
- New AMSA vessels shall be allocated IOs for at least their first 3 voyages (including at least 1 long-haul).
- General exporters will need to have an IO on at least one voyage per 6 month period.
- Exporters and/or vessels with a reportable mortality or on-board welfare incident that the department deems as necessary to require further independent reporting will have 3 IO voyages;
  - The IOs may be allocated anytime in the next 3-6 month period, will be unannounced and the exporter only notified 2 weeks prior to vessel departure.
  - o If an incident occurs for an irregular exporter, they will require onboard IOs until the department deem it appropriate for them to be removed.
- Exporters that can demonstrate ongoing high performance shall not carry IOs on voyages they have previous successful experience with
  - o 'High Performer Short-haul' and 'High Performer Long-Haul' status' are awarded separately.
  - To be awarded a 'high performer' rating, exporters must pass a metric of primary and secondary performance measures. AUSTREX would welcome the opportunity to engage on suggested detail of this metric.