



Dr. Michael Bond
Interim Inspector-General of Animal Welfare and
Live Animal Exports
GPO BOX 858
Canberra ACT 2601

Singapore, 11th of April 2024

Subject: Feedback about Independent Observer Program

Dear Dr. Michael Bond,

Livestock Express is the world's largest independent seaborne livestock carrier with 60 years' experience on a worldwide basis and has been the main pioneer in the development of modern livestock carriers since the start of the commercial market. Fewer than 20 purpose-built livestock carriers have entered the worldwide fleet throughout history of which 13 were designed and built by Livestock Express. Our philosophy and commitment is to provide sustainable and reliable livestock transportation services without compromise when it comes to safety and welfare of crew and livestock. Today Livestock Express operates 14 livestock vessels of which 11 are trading from Australia. We have long term relationships with all key live exporters in Australia.

Livestock Express appreciates this opportunity to provide feedback on the Independent Observer Program.

Our key observations and feedback is as follows:

1. Restricted cabin space

Accommodation space is generally restricted on livestock vessels, especially on small and medium-sized vessels restricting the deployment of I/O's on voyages. Sufficient crew should be maintained on each vessel to allow the safe and proper operation of the vessel. Apart from the day-to-day care for the livestock we need to consider engine room staffing, bridge/navigation staffing, vessel maintenance and cleaning requirements. The total persons on board the vessel cannot be increased under normal circumstances due to restrictions to the life-boat capacity and or safety equipment as regulated by SOLAS. Reducing crew levels may also impact the work and rest hours as regulated by the Marine Labour Convention. Livestock Express prides itself for having high quality and well trained crew on its vessels. We run a cadet/training program where junior crew gets on-the-job training. This is an important program to assure the long-term quality of our crew pool. We have observed a push to reduce crew levels to accommodate I/O's on our vessels without considering the regulatory limitations and impact on the animal care and vessel operations.

2. Timing of Reporting

We note that I/O reports are typically published months after the voyage. Any observations should in our view be addressed immediately with the Captain so the specific situation can be properly assessed and addressed if required. Crews are rotated and accurate assessment months after the voyage is challenging as those persons involved might no longer remember the specifics or signed off from the vessel.

3. Cost of the I/O program

Whilst Livestock Express does not bear the cost of the I/O deployment we understand from our clients that the overall cost of deployment is considered exorbitant and affecting the commercial viability voyages. Livestock Express has invested in permanent sensor systems in the cargo-holds which is currently available on a number of vessels and provides remote monitoring options. With continuous improvement of internet quality and speed on vessels we believe there are viable cost effective technologies which can provide more immediate and objective assurance to both the regulator and general public. The use of sensor data, body camera's or even live video should in our view be considered.

4. Insurance and Safety

I/O's have been instructed to NOT sign our standard Letter of Indemnity we require for any passengers joining a vessel. Livestock Express has previously reached out to DAFF requesting information with regards to insurance policies and coverage. These requests remained unanswered. In the event of a medical emergency (i.e. vessel would be required to deviate from its original course and or call ports for a medivac) it remains unclear whether DAFF has appropriate insurance in place or if such costs are expected to be absorbed by the vessel owner.

Livestock Express is proud to provide high quality tonnage where the highest animal welfare standards are achieved. We are supportive of transparency both towards the regulator and general public, but believe the I/O program must be improved by taking into account the items highlighted in this letter.

We remain at your disposal for any further information and appreciate this opportunity to share our thoughts on the I/O program.



Kind Regards,

Lennart Ephraim,

Chartering Manager Livestock Express

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