LIVESTOCK, BULK AND RURAL CARRIERS ASSOCIATION

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AAWS project team
Department of Agriculture, Fisheries and Forestry
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Submission on the draft Australian Animal Welfare Strategy

Dear AAWS project team,

The Livestock, Bulk and Rural Carriers Association (LBRCA) welcomes the opportunity to comment on the draft Australian Animal Welfare Strategy. As the peak body representing rural carriers across Australia, we have unique insights and real-world experiences from hundreds of participating members to aid in the development of the strategy.

LBRCA supports a nationally consistent, evidence-based approach that improves animal welfare and supports the businesses and workers who deliver it, including livestock carriers.

The strategy should recognise the decisions that shape animal welfare throughout the livestock transport journey, from preparation and loading to unloading at the destination. Carriers can be held responsible for matters outside their control, including how animals are handled before departure and whether ramps and pens at the destination are fit for purpose. Producers, consignors, agents, carriers, facility operators, receivers and end customers each influence welfare outcomes. The strategy should therefore clarify what each party can reasonably control.

Standards and implementation are the top priorities for LBRCA members, supported by leadership and coordination. Governments should align legislation, regulations and codes of practice across jurisdictions and consider how they interact with voluntary industry practices and commercial arrangements. This would give operators clearer obligations and help align responsibility with each party's control.

Putting standards into practice depends on suitable ramps, yards and receival facilities, as well as access to truck washes and effluent management facilities. Suitable road access can also help avoid unnecessary delays. We encourage the Department to draw on operator experience and assess any proposed requirements for their welfare benefits, feasibility and cumulative cost.

LBRCA's position is that the strategy must avoid adding to the regulatory, compliance and cost burden on the livestock industry. Operators and drivers already work across a fragmented system of animal welfare and heavy vehicle requirements. Clear responsibilities, suitable infrastructure and practical support would help drivers manage welfare risks.

Yours sincerely,

Wade Lewis
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LBRCA response to Australian Animal Welfare Strategy consultation

LBRCA supports a national, principles-based strategy grounded in scientific evidence, practical expertise and cooperation. In livestock transport, welfare outcomes depend on decisions and facilities across the supply chain. The strategy should clarify what each party can reasonably control at each stage of the journey.

Is the purpose of the strategy clear?

Somewhat agree.

The strategy's purpose is clear in broad terms. LBRCA supports its aim of setting national direction, strengthening collaboration and supporting continuous improvement in animal welfare, as well as its recognition of existing responsibilities and decision-making arrangements.

The strategy should clarify its role as a collaborative framework that guides future priorities. LBRCA supports addressing implementation plans, funding and timelines through subsequent processes, with any proposed duties, accreditation or reporting obligations considered on their merits.

The strategy should expressly recognise preparation, loading, road transport, unloading and receival as stages at which coordinated action can improve welfare. Practical opportunities include better loading infrastructure, supply chain training and a national ramp standard. (Strategy pp. 1–3 and 39–42.)

Do you have any comments on the statements in 'Why animals matter to Australians'?

Somewhat agree.

The section appropriately recognises food and fibre production, regional employment, economic activity, cultural significance and the wider benefits animals provide. LBRCA's comments focus on livestock and other production animals.

The strategy should recognise the diversity of community views. Community expectations can inform policy, and any proposed intervention should be supported by scientific evidence and practical expertise. The strategy should also recognise the importance of protecting lawful business operations from unlawful disruption.

The references to positive experiences and the Five Domains Model provide a broad conceptual basis. Any future application to livestock transport should use species-specific evidence and measures validated for Australian geography, climate and operating conditions. Minimum requirements should be clearly distinguished from aspirational improvements.

The strategy should recognise the links between animal welfare and driver safety. Preparation, handling and receival arrangements affect welfare throughout the journey.

Access to suitable wash facilities, unloading sites and driver amenities helps operators manage these risks. (Strategy pp. 2–4.)

The roles and responsibilities for animal welfare outcomes in Australia are well defined by Australia's animal welfare system.

Somewhat agree.

The section outlines the roles of governments, industry, transport operators, veterinarians, researchers and other participants. LBRCA supports shared responsibility and the use of practical industry expertise. The volume of guidance, codes and regulations can make it difficult for operators to understand their obligations.

Greater clarity is needed where responsibilities overlap in the livestock supply chain. The strategy should recognise how producers, consignors, agents, carriers, facility operators and receivers influence livestock preparation, fitness for the intended journey, consignment information, loading facilities, scheduling and timely unloading.

Responsibility should reflect each party's role, reasonable control, influence and applicable duties. The strategy should explain how animal welfare responsibilities interact with the separate Chain of Responsibility duties under the Heavy Vehicle National Law. (Strategy pp. 5–8 and 39–40.)

Which of the priority areas is most important for animal welfare in Australia?

Standards and implementation.

Practical, nationally consistent and evidence-based standards provide a foundation for better animal welfare. LBRCA supports the draft's recognition of costs, practicalities, proportionate approaches and reduced duplication. This priority should build on existing arrangements and avoid conflicting interstate requirements.

For livestock transport, implementation depends on suitable ramps, yards, holding and receival facilities, access to truck washes and effluent management facilities, driver amenities, suitable routes and arrangements that minimise avoidable delays. Section 11.3 should expressly recognise these conditions.

Operator expertise, supply chain training and transport-specific research should inform future standards. Any proposed requirements should demonstrate welfare benefits and take account of feasibility and cumulative costs. Leadership, research, education and efficient reporting all support implementation. (Strategy pp. 9–10 and 39–42.)

The objectives outline the areas where animal welfare can be improved across all animal groups in Australia.

Somewhat agree.

The objectives identify relevant areas for improvement, including clearer responsibilities, national consistency, evidence-based standards, research, education and efficient reporting. Their broad framing is appropriate to a strategy spanning diverse animal groups.

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Chapter 11 should explain how these objectives apply to livestock transport. Its opportunities should expressly cover suitable infrastructure, links to biosecurity and emergency preparedness, driver safety, and shared responsibility across the supply chain.

Transport research should examine preparation and fitness for travel, time off feed and water, thermal conditions, livestock handling during loading and unloading, load management, journey interruptions and facility design. Assess new technology against demonstrated welfare benefits, reliability and feasibility. Build on existing training, assurance and information systems, collect data proportionately and protect confidential information.

LBRCA seeks targeted additions to Section 11.3 within the existing objectives and supports using existing regulatory, certification and reporting arrangements. (Strategy pp. 9–13 and 41–42.)

The table sets out LBRCA's assessment of potential risks for livestock transport operators as the strategy is implemented.

LEVEL	RISK	EXPOSURE
High	Additional compliance obligations	Future standards, inspections, recordkeeping or assurance requirements could increase costs and administrative work. LBRCA supports using existing arrangements where they deliver the intended welfare outcomes. (Strategy pp. 10–11 and 42.)
High	Unclear allocation of responsibility	Carriers could be held responsible for risks controlled by consignors, agents, facility operators or receivers unless the strategy clarifies each party's role. (Strategy pp. 39–40.)
High	Infrastructure gaps	Section 11.3 could give greater attention to ramps, yards, truck washes, suitable road access and receival capacity. These conditions affect how operators can manage welfare risks. (Strategy pp. 41–42.)
High	Duplicate private accreditation	Assurance requirements could lead to repeated audits or overlapping customer requirements, particularly for small operators. Recognition of equivalent assurance could reduce duplication. Supply chain pressures also need attention. (Strategy p. 42.)
Medium–high	Inconsistent implementation across jurisdictions	States and territories could adopt national standards differently or on different timelines, increasing complexity for interstate carriers. (Strategy pp. 39 and 42.)
Medium–high	Data and technology costs	Additional reporting and monitoring technology could increase costs and raise confidentiality concerns. Proposals should demonstrate welfare benefits and specify how data will be handled. (Strategy pp. 10–11 and 42.)
Medium	Commercial and reputational pressures	Retailers, processors and customers could impose additional requirements that affect contract terms or market access. (Strategy pp. 40–42.)

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Conclusion

LBRCA supports renewing the Australian Animal Welfare Strategy and improving livestock welfare through nationally consistent, evidence-based standards and clear responsibilities. We ask the Department to strengthen Section 11.3 by recognising the full livestock transport journey, from preparation and loading through to unloading and receival, and by clarifying what each party can reasonably control at each stage.

Better welfare outcomes depend on the conditions in which livestock are handled and moved. Fit-for-purpose ramps, yards and receival facilities, access to truck washes and effluent management facilities, and suitable routes all help drivers and other supply-chain participants manage welfare risks.
LBRCA encourages the Department to draw on the experience of carriers, drivers and other supply-chain participants when developing implementation priorities.

The Strategy should build on existing arrangements, reduce duplication across jurisdictions and avoid adding to the regulatory, compliance and cost burden on livestock operators. Any future requirements should demonstrate a clear welfare benefit, be workable in regional operating conditions and account for their cumulative cost.

LBRCA welcomes the opportunity to work with governments and industry to put these principles into practice.