

Attn: Maintenance Team
National Transport Commission
Level 3/600 Bourke Street
Melbourne Vic 3000

Dear Sir/Madam

Re: Effluent and Load Restrain Discussion Paper

The National Farmers' Federation (NFF) is the peak national body representing farmers and, more broadly, agriculture across Australia. It is one of Australia's foremost and respected advocacy organisations.

Since its inception in 1979, the NFF has earned a reputation as a leader in the identification, development and achievement of policy outcomes that champion issues affecting farmers and are dedicated to the advancement of agriculture.

Transport of livestock via public road networks is an indispensable and crucial component of chains to move animals between farms, feedlots, saleyards, live-export ports and abattoirs.

The livestock industry understands the importance of managing livestock effluent on public roadways to ensure road safety, animal welfare, biosecurity, amenity, environmental and business interests. The industry continually works to improve these outcomes and supports any initiatives that facilitates positive change along industry supply chains.

Due to its complexity and lack of an identified and consistent lineal supply chain process, the NFF does not support the extension of chain of responsibility duties for parties in the livestock supply chain.

The transport of livestock via Australia's road and rail networks is an integral part of supplying high-quality produce via abattoirs to the domestic and international markets. Coupled with this is the growing market of live-export cattle and sheep to overseas markets, particularly in Asia and the Middle East.

To enable the industry to be efficient and effective, livestock need to be transported from farm to farm, and from properties to feedlots or saleyards. Transport may occur between several of these points in the life of an animal, terminating at an abattoir or live-export facility.

The industry understands that, on occasion, effluent discharges have resulted in community complaints, though there is little consensus on who is responsible and who needs to address the issue. This has resulted in localised solutions being implemented without a coordinated industry approach to the problem.

Industry stakeholder consultation has identified there is no one single solution to solve this issue and there are a number of initiatives that could be used to minimise effluent spillage from livestock transport vehicles:

-) curfew of livestock prior to transport;
-) selective effluent containment through urban areas using drop pipes;
-) effluent holding tanks;
-) provision of more readily available washdown facilities;
-) provision of effluent dumps where effluent from effluent holding tanks can be disposed;
-) alternate routes around towns for heavy vehicles carrying stock.

Significant capital costs are associated with the design and construction of effluent disposal sites to dump effluent from these tanks. This cost is relative to the water availability, proximity to major roads and towns, labour costs, site specific design parameters including legislative requirements for effluent disposal, and construction materials used for the disposal site.

The direct capital and operational costs borne by livestock transporters due to effluent holding tank installation could be significant in terms of increased labour costs to clean and maintain tanks. These costs will be passed onto the livestock producers potentially increasing livestock transport freight costs.

The NFF have supported in our 2017/18 Pre Budget Submission to Treasury, the Australian Livestock and Rural Transporters Associations' proposal to build a trial site for a livestock effluent disposal facility in South-East Queensland with the view to expanding the program should the trial site prove successful.

The industry supports the reform of existing laws required to allow for minor, incidental and unavoidable spills that do not compromise the overriding safety objectives of the load restraint provisions?

It is unrealistic to expect there be absolutely no effluent escape from livestock trucks. NFF therefore supports option 3 to allow for a minor, incidental or unavoidable loss of part of a load.

Thank you for the opportunity to provide a submission. Should you wish to discuss further please do not hesitate to contact Mr Mark Harvey-Sutton, General Manager for Rural Affairs at mharveysutton@nff.org.au or on 02 6269 5666.

Yours sincerely



TONY MAHAR
CEO