



LIVESTOCK TRANSPORTERS
ASSOCIATION OF VICTORIA INC
ABN 81 058 179 907

17th September 2009

Mr Bruce Anson
Chief Executive Officer
Warrnambool City Council
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Dear Mr Anson

**RE : SUBMISSION - REGIONAL LIVESTOCK EXCHANGE SOUTH WEST
VICTORIA**

To assist the Warrnambool City Council reach an informed decision on the establishment of a new livestock exchange facility in South West Victoria, the Livestock Transporters Association of Victoria inc. (LTAV) would like to make a formal submission.

By day and by night, in good weather and in bad and at times in isolation, our 170 members are regular users of all livestock handling facilities across South Eastern Australia. This includes feedlots, abattoirs, saleyards, airports, sea terminals and of course farms. We believe we are one of the few, if not only industry association who can truly claim to understand all of the issues involved in operating livestock handling facilities.

As such we believe that our members have much to contribute to Council's current initiative with our overriding concern being to achieve a world's best practice livestock handling facility for the next 50 years.

This type of facility will meet the ever increasing demands of all stake holders in the meat and livestock supply chain, not just livestock transporters.

CURRENT SITUATION

The current facility at the Warrnambool Livestock Exchange has the 3rd largest cattle throughput in Victoria, and provides an important income stream to many of our members. The Exchange includes adequate truck parking, 24 hr access, clean showers and toilets for drivers, a quality truck wash facility, and many dirt yards for holding and spelling cattle. While being at the stage of appearing "tired" the current facility is still quite functional and by no means inadequate.

In the immediate future the current facility would need to see roofing of dirt yards due to the local weather conditions not supporting open dirt pens - often turning them to mud and causing animal welfare issues. That said this has been a major problem for some years and effects the presentation of cattle to purchasers and outbound transporters in a poorer condition, than when they entered the yards.

Soft flooring is also needed to the selling pen areas with the current concrete base causing foot soreness in cattle, making them difficult to transport. The bobby calf pens are currently covered but do still get wet and cold and this really should have a warmer

soft floor set up. With new animal welfare legislation being introduced into Victoria in the next 6 months, the need to comply with the chain of responsibility requirements of the legislation ensures that these requirements need to be high on the agenda of the centre's management.

Regardless of any discussion to move to a new facility, OH&S requirements need to be given consideration. Lighting to the holding pen area is very poor in its current state and is dangerous to work in at night. Lighting over the loading area is very good, but with no double deck loading ramps available and 80 – 90% of all stock transported out of the yards on double deck trucks, installation of at least 3 double deck ramps should also be given priority. The animal welfare issues surrounding loading and unloading of livestock has a special mention in the upcoming legislation.

INDUSTRY PROBLEMS

Currently across south east Australia there are a number of problems shared by livestock handling facilities as a whole. These include an unacceptable shortage of truck wash facilities leading to bio-security concerns, foot soreness in cattle due to concrete floors, new driver fatigue laws bringing agents, processors and saleyards under the chain of responsibility legislation, access restrictions, effluent disposal, animal welfare legislation requirements, OH&S training and accreditation, labour shortage, and probably most concerning poor stock handling facilities. Many of our members have seen a huge upgrade in the standard of vehicles used to transport livestock over the last 20 years to ensure stock are delivered in the same condition as to when loaded. Due to outdated facilities (not just saleyards) we have seen the need to prepare stock properly before transporting, become a major problem to carriers. Poorly prepared stock can be foot sore, dehydrated, stressed due to overcrowding, and injured during handling before loading.

OTHER LIVESTOCK EXCHANGES

Warrnambool is not the only centre to look at updating. As such our association believes it is important to understand the positive and negative results of other centres experiences. Many have only upgraded current facilities, but there a good number of new centres as well. New centres include Echuca VIC, Carcoar NSW and Forbes NSW. All these centres are of a quality standard, but all have fundamental flaws due to a lack a consultation with the end users. As an example Echuca has major concerns with access restricted due to a VCAT planning covenant requiring all access stopped after 9.00 pm at night. This has huge conflicts with both the new driver fatigue and animal welfare legislations. The core reason for this is that Campaspe Shire never conducted an environmental impact study prior to establishing their centre!!!!

Carcoar NSW has problems with the live weight weighing system being very slow and delaying drivers load out times. This again conflicts with both new legislations. VLE Leongatha has attempted many upgrades to an old facility but is still trouble with poor load out ramps. Forbes NSW is recommended as a standard to achieve, as it is a very good centre.

LOGISTICAL PROBLEMS

While supporting a new centre, we would have concerns with a "super centre". If a new centre was to close other centres in the district, consideration would need to be given to the sale process. If for example the amount of stock sold over three different centres were to be consolidated into one centre, it may cause pressure on the logistic capabilities of the current transport industry. With the high cost of equipment operators need to get a return by working their trucks all week. If a super centre sold the districts cattle in just one or two days, operators would be challenged with peaks and troughs in the workload. This may force rates up to cover lost income in the trough period that would normally be conducted on another day of the week.

ENVIRONMENTAL CONCERNS

Currently our industry is seeing an increase in a shortage of truck wash facilities. Just locally the Camperdown and Colac facilities have restricted access to week days only. The DPI has recently shared concerns with our industry about bio-security and the threat of disease such as foot and mouth and mad cow. We feel we are yet to see the full extent of problems related with effluent disposal, and would call on the council to ensure this be considered in any future planning.

LESSON LEARNED

What have we as an industry learned from all this? As a responsible and proactive industry body the LTAV understands the benefit of thorough planning and consultation before undertaking any major works program. We have developed a number of (and are still developing more) position statements and recommended design standards that are of a benefit to all stake holders in Australia's multibillion dollar, meat and livestock supply chain. Any decisions made without consulting all stake holders can only be dangerous. If a new facility was to be planned for the Warrnambool region we would encourage council to ensure ALL stakeholders are given ample opportunity to be part of the planning stage. At present there has not been any proposal made public to the type of facility being planned. It is also believed that council is considering relinquishing control of the facility to a private operator. While not having a preference for either private or council run saleyards, we would have concerns for council giving control to private operators without some control measure first being in place to meet the needs of all users.

There are a number of privately run saleyards across the country now with a number of companies running them. All of these companies should be starting to understand the requirements to build a facility to serve the community for at least the next 40 years. Given there are a number of operators in the country it should be considered to give all the opportunity to tender for a new facility, ensuring the end users get the best possible centre. One concern we would have with a privately run centre is not having representation on any advisory board. Currently with council run saleyards, livestock transporters sit on advisory boards ensuring our industry's voice and input into any decisions that may affect our members. While it can't be forced upon privately run facilities to ensure end users get a voice, we would recommend that council look for some sort of regular consultation when looking at any tenders for such an operator.

VLE PROPOSED SITE AT CUDGEE

Through media releases and information provided from other stakeholders it is known that VLE is proposing a new site at Cudgee on the Princes Hwy. We would ask council to consider a few points before approving such a venture. Access to the site may possibly need to be provided through an upgrade to Andertons Road. With the high volume on the Princes Hwy an upgrade to Andertons Road would be needed to provide a safe area for trucks to pull out from. Also the current passing lane would need to be extended towards Panmure, as trucks would find it difficult to build up speed when taking off into an uphill climb. Faster flowing traffic from the Warrnambool direction may be held up from livestock trucks exiting the centre and could cause motorist to attempt unsafe overtaking. The Panmure – Naringal Rd would need to be considered for upgrading to accommodate B-Double trucks as it will be the most direct route to the centre from the southern areas. This area which includes Nirranda, Heytsebury and Cobden is one of the largest supply areas of cows to both the Warrnambool and Camperdown Markets. The bridge over the Hopkins Falls is currently only a single lane bridge. A lot of traffic north of Cudgee will come to the centre from that direction and the bridge would most definitely need widening to accommodate the increased traffic flow. Occupation lane and the Sisters – Mortlake rd would also need to be approved for B-Double access to link the centre with the Hamilton Hwy and other northern routes. A dog boarding kennel currently operates opposite the proposed site. This may be a concern with dogs not in their normal environment, possibly barking at the presence of cattle nearby. Many truck drivers also carry working dogs with them and the kennels may also affect the working dogs behaviour.

RECOMENDATIONS

The LTAV would like the Warrnambool City Council to consider the following recommendations before deciding on any future development.

- Ensure all stake holders are consulted and kept informed with the planning process, including location, design and 24hr controlled access.
- Ensure an environmental impact study is done before any decision is made to approve any new facility.
- Access via major road network including B-Double routes from all directions.
- New driver fatigue and animal welfare legislations are adhered too.
- Holding and feeding facilities to support driver fatigue and animal welfare legislation.
- Modern livestock handling facilities including ramp design that meet both OH&S and animal welfare requirements. This includes ramps built to LTAV / LSAV recommended standards.
- All environmental concerns are considered, including effluent disposal and water supply and quality to be given priority. Including a truck wash with a minimum of 3 bays built to LTAV recommended standards.
- Soft flooring to ensure cattle is prepared for transport adequately.
- Weather conditions are considered with a roof over the whole facility, including loading ramps.

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- Consider the current economic situation, ensuring that if a new project goes ahead it is built to the highest standard possible, not the cheapest way possible.
- Consultation with transporters and processors as to what day of the week and sale times suits all stake holders best.
- Consultation with other new centres to ensure the same mistakes aren't made, and alternatively those positive results are noted.
- If council continue with the current facility, they consider soft flooring, a roof, improved lighting and three double deck loading ramps as a priority.

The LTAV would like to thank the Warrnambool City Council for the opportunity to provide this written submission and reserve the opportunity to support it by speaking at the Special Council Meeting on the 8th October 2009 if we feel the need to clarify any issues raised. We would also welcome the opportunity to participate in any planning committee if one was to be commissioned.

Please feel free to contact me on 0408 526 923 or 5566 3267 or by email: anthonyb@boyleslivestock.com.au if required.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Anthony Boyle', with a stylized flourish at the end.

Anthony Boyle
President
Livestock Transporters' Association of Victoria.
