

**Phibro Young Lot Feeder Achiever of the Year
Finalist essay**

Consistency of heavy vehicle transport regulations would improve compliance and profitability

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Livestock transport regulations in New South Wales are estimated to be costing the State's feedlot industry in the vicinity of \$2.5m per annum more compared to other State's. These costs can be attributed to New South Wales not adopting volumetric livestock loading guidelines.

Due to the costs associated with this approach, it is seen as an important issue by the industry. ALFA has previously raised this issue with the New South Wales Road Transport Authority [RTA]; however it requires ongoing lobbying and pressure by industry groups to see further action.

In Queensland, Victoria and South Australia, transport of general goods is subject to 'mass limits', whilst livestock transport vehicles are 'exempted' from these mass limits, provided they meet a series of criteria. The major criteria is that the national animal welfare standards for loading densities are observed. This loading method is referred to as volumetric loadingⁱ. In contrast, in New South Wales, livestock transport vehicles [as well as general transport vehicles] are required to comply with general mass limitsⁱⁱ.

In many situations, this means feedlots in NSW are carrying fewer cattle on each truck [both in and out of feedlots].

To provide an example of the impact this difference, we will look at a 'typical' abattoir cartage for a feedlot business, and compare the impact in Queensland versus New South Wales. Variables included in this scenario are:

- 650kg bullocks being transported to abattoir
- 200km loaded journey
- B-double configuration (tare weight of 32 tonne)

The Queensland feedlot would be able to comfortably load 60 animals with no negative welfare implications and would leave the feedlot with a gross vehicle mass of approximately 71 tonne (b-double tare of 32 tonne plus cattle weighing 39 tonne).

The New South Wales feedlot would be restricted to the allowable concessional vehicle mass limit for a b-double (64.5 tonne). Therefore with the 64.5 tonne gross limit, less the b-double tare of 32 tonne, this would leave a 32.5 tonne allowable loading weight. Given a live weight of 650kg per beast, the truck would have a permissible load of 50 bullocks.

Based on transport industry quotesⁱⁱⁱ this would generate a cost of dispatch in New South Wales of \$2.05 per animal greater than the Queensland feedlot. For a 10,000 head feedlot, turning over 35,000 head per year, this would accumulate to \$72,000 of additional transport costs per annum (refer tables 1-4). If the additional cost on those same incoming feeder

cattle were also considered the impact could conceivably be increased to \$105,000 of additional transport costs per annum.

Given that the above figures are for one medium sized feedlot operation, if we were to look at the New South Wales Feedlot industry as a whole, which may turn over 1,600,000 cattle annually, this could conceivably be costing the industry \$2.5 million per annum. If the broader livestock industry was considered, the impacts would be much greater.

Livestock loading activities also have implications in compliance activities, particularly in terms of exposure within the chain of responsibility. From a feedlot perspective, ownership under chain of responsibility is applied during the receipt or loading of a heavy vehicles^{iv}. Feedlots are responsible for controlling the weights that these vehicles are operating and in some cases feedlots report those transporters exceeding allowable mass limits.

As discussed earlier, volumetric livestock loading allows for livestock to be loaded primarily according to welfare considerations, not vehicle mass limits. Given the difficulties that can be experienced with estimating the live weight of cattle across mobs, this reduces the likelihood of unknowingly loading a vehicle overweight. Therefore this would reduce exposure on chain of responsibility.

The New South Wales government has recently implemented measures to improve the livestock transport regulations, however the measures are seen as ‘token’ and do not provide the same functionality and flexibility as is available in the other states.

Our industry needs to encourage all states and territories to implement volumetric livestock loading as a ‘best practice’ initiative as this would improve our industry’s ability to meet profitability goals and compliance requirements.

Table 1. Individual Feedlot - Cost of Transport - Arrival Transport		
State	QLD	NSW
Km to Feedlot	300	300
\$ per Deck/Km	\$5.80	\$5.80
Cost	\$305.80	\$305.80
No. of Decks	3	3
Total per truck	\$917.40	\$917.40
Head per truck	84	77
Cost per head	\$10.92	\$11.91
Different between states		\$0.99
Annual Turnover (head)	35000	35000
Cost of Transport	\$382,250.00	\$417,000.00

Table 2. Individual Feedlot - Cost of Transport - Dispatch Cattle		
State	QLD	NSW
Km to Works	200	200
\$ per Deck/Km	\$5.90	\$5.90
Cost	\$205.90	\$205.90

No. of Decks	3	3
Total per truck	\$617.70	\$617.70
Head per truck	60	50
Cost per head	\$10.30	\$12.35
Difference between states		\$2.06
Annual Turnover (head)	35000	35000
Cost of Transport	\$360,325.00	\$432,390.00

Table 3. Individual Feedlot - Cost of Doing Business in NSW vs QLD	
Cost of Arrival (over QLD)	\$34,750.00
Cost of Dispatch (over QLD)	\$72,065.00
Total	\$106,815.00

Table 4. Feedlot Industry - Cost of Doing Business in NSW	
Annual Turnover	825,000
Additional Cost of Transport Per Head	\$3.05
Total	\$2,517,782.14

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- i Queensland Government, Guideline for Livestock Loading in Queensland, Form Number 3 – Version 4, 2009.
 - ii New South Wales Government, NSW Livestock Transport Productivity Package and Livestock Welfare Mass Management Accreditation Scheme, 2010.
 - iii Livestock Carrying Company, Verbal, June 2011
 - iv Victorian Government, Chain of Responsibility, VicRoads Publication 01475, June 2005.