



Effluent and load restraint
Discussion Paper
MAY 2018



National Transport Commission

Report outline

Title	Effluent and load restraint
Type of report	Discussion paper
Purpose	For public consultation
Abstract	The paper focuses on the loss of effluent as a load restraint breach and considers two issues in relation to the enforcement of such breaches under the Heavy Vehicle National Law (HVNL). The paper proposes three options to clarify the application of HVNL chain of responsibility duties and minor, incidental and unavoidable (in any practical sense) effluent spills being subject to compliance action.
Submission details	Submissions will be accepted until Friday 6 July 2018 online at www.ntc.gov.au or by mail to: Attn: Maintenance Team National Transport Commission Level 3/600 Bourke Street Melbourne VIC 3000
Key words	Effluent, livestock, load restraint breach, loss of effluent, chain of responsibility, heavy vehicle national law
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1 Context

Key points

Loss of effluent is currently treated as a load restraint breach under the Heavy Vehicle National Law (HVNL) and state road laws. The law is not clear on how chain of responsibility duties apply in the livestock supply chain. As a result, drivers are being penalised for these load restraint breaches, despite having limited influence over effluent generation. In some instances, drivers are being held solely responsible for minor, incidental or unavoidable effluent spills. Transport associations argue that this is unfair and does not improve effluent control on Australian roads.

1.1 Objectives

The loss of effluent from a heavy vehicle is treated as a load restraint breach under the Heavy Vehicle National Law (HVNL) and state road laws. However, a number of issues have been raised with the enforcement of these load restraint breaches, including:

- a lack of clarity about the application of HVNL chain of responsibility duties to effluent control, and
- minor, incidental and unavoidable (in any practical sense) effluent spills being subject to compliance action.

The National Transport Commission (NTC) has been asked by the Queensland Parliament's Transport and Utilities Committee to review these issues as part of its role in maintaining the HVNL.

The purpose of this paper is to seek stakeholder feedback regarding possible amendments to the HVNL to:

- clarify the application of chain of responsibility duties for parties in the livestock supply chain, and
- allow for minor, incidental and unavoidable (in any practical sense) spills that do not compromise the overriding safety objectives of the load restraint provisions.

Additionally, the NTC would like industry to provide any examples where a small, minor or incidental loss of effluent has affected safety or public amenity where the driver or operator has taken reasonable precautions.

Changes to the HVNL would form part of a broad strategy aimed at improving effluent control on Australian roads. The proposed changes in this paper are limited to the HVNL and do not include amendments to state road laws or environmental laws.

1.2 Background

1.2.1 Object and purpose of the Heavy Vehicle National Law

The object of the HVNL is to establish a national scheme for facilitating and regulating the use of heavy vehicles on roads in a way that:

- promotes public safety
- manages the impact of heavy vehicles on the environment, road infrastructure and public amenity

- promotes industry productivity and efficiency in the road transport of goods and passengers by heavy vehicles, and
- encourages and promotes productive, efficient, innovative and safe business practices.

The purpose of chapter four (vehicle operations – mass, dimension and loading) of the HVNL is to:

- improve public safety by decreasing risks to public safety caused by excessively loaded or excessively large heavy vehicles, and
- minimise any adverse impact of excessively loaded or excessively large heavy vehicles on road infrastructure or public amenity.

1.2.2 Current legislative load restraint requirements

Section 111 of the HVNL is the principal provision dealing with load restraint. This section provides that it is an offence for a driver to drive on a road a heavy vehicle that does not comply with the loading requirements applying to the vehicle.

The loading requirements are set out in schedule 7 of the Heavy Vehicle (Mass, Dimension and Loading) National Regulation. The requirements provide that a load on a heavy vehicle must be secured so it is unlikely to fall or be dislodged from the vehicle. Section 115 of the HVNL provides that evidence that a load or part of a load has fallen off a heavy vehicle is evidence that the load was not properly secured.

Currently, only the driver is liable for the offence under section 111. However, section 183 of the HVNL extends liability for a breach of section 111 by providing that if a driver commits the offence then (subject to the reasonable steps defence) other parties in the chain of responsibility are also taken to have committed the offence.

Importantly, section 183 will be repealed when chain of responsibility amendments commence on 1 October 2018 and the 'reasonable steps' defence will be amended to a 'reasonable excuse' defence (see 1.2.3).

Currently, parties in the chain of responsibility are defined as:

- an employer of the vehicle's driver if the driver is an employed driver
- a prime contractor for the vehicle's driver if the driver is a self-employed driver
- an operator of the vehicle
- a scheduler for the vehicle
- a loading manager for any goods in the vehicle, and
- a commercial consignor of any goods for transport by the vehicle that are in the vehicle.

1.2.3 Chain of responsibility amendments to the Heavy Vehicle National Law

In June 2016, the Transport and Infrastructure Council endorsed amendments to the HVNL to implement reforms to chain of responsibility obligations. These amendments are contained in the *Heavy Vehicle National Law and other Legislation Amendment Act 2016* (the amendment Act).

The amendment Act contains a new Chapter 1A for the HVNL which sets out the main new chain of responsibility provisions. These provisions have not yet commenced. Section 26C is the new section in Chapter 1A that essentially replaces section 183. Section 26C will set out the primary duty of each party in the chain of responsibility. It will provide that each party must, as far as is reasonably practicable, ensure the party's conduct does not directly or indirectly cause the driver of the heavy vehicle to contravene this law.

The amendment Act defines party in the chain of responsibility as:

- if the vehicle's driver is an employed driver—an employer of the driver
- if the vehicle's driver is a self-employed driver—a prime contractor for the driver
- an operator of the vehicle
- a scheduler for the vehicle
- a consignor of any goods in the vehicle
- a consignee of any goods in the vehicle
- a packer of any goods in the vehicle
- a loading manager for any goods in the vehicle
- a loader of any goods in the vehicle, and
- an unloader of any goods in the vehicle.

The uncommenced provisions of the amendment Act will come into effect on 1 October 2018.

2 Issues

Key points

The object of the HVNL is to establish a regulatory framework that promotes public safety, productivity and environmental outcomes.

The livestock supply chain is different to the movement of other types of freight, liquids, gasses and inert objects, which can be fully contained. Due to the live nature of animals, it is inevitable that they will release bodily fluids over the course of the journey.

Two issues have been raised in relation to lack of clarity about:

- the application of chain of responsibility duties, and
- minor, incidental and unavoidable spills being subject to compliance action.

ALRTA has advised there have been no known prosecutions of chain parties beyond the driver and operator in relation to effluent loss, despite chain of responsibility laws being in place since 1997. According to ALRTA, it is livestock preparation (mainly overfeeding of animals) that is the primary cause of effluent loss during transport.

Anecdotally industry has raised examples where the application of the law and the load restraint performance standards has been applied where safety is not an issue. The NTC has been unable to locate any evidence that a minor, incidental or unavoidable loss of effluent has affected safety or public amenity.

2.1 Purpose of the Heavy Vehicle National Law

The object of the HVNL is to establish a regulatory framework that includes prescribing requirements for securing and restraining loads on heavy vehicles (section 4(c)(iii)) and imposes duties and obligations for ensuring the heavy vehicles and their drivers comply with the requirements on **persons whose activities may influence whether they comply** (section 4(d)). It can therefore be argued that chain of responsibility under the HVNL already applies to parties in the livestock production chain.

2.2 Context of issue

The livestock supply chain is different to the movement of other types of freight, liquids, gasses and inert objects, which can be fully contained. Due to the live nature of animals, it is inevitable that they will release bodily fluids over the course of the journey. Other types of freight, liquids, gasses and inert objects restrained in a well-sealed truck will not emit such liquid, waste or spillages.

Livestock have welfare requirements under legislation and the *Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock*. When transporting livestock, it is essential that practices are in place that reduces stress and minimises any risks to animal welfare. This includes adequate food, water, shelter and protection from disease and well-designed and maintained transport facilities.

Meat and Livestock Australia advise producers to hold stock off feed and water for eight to 12 hours prior to transport if possible and that time off water prior to loading is part of the maximum time off water for the intended journey. Therefore, the time off feed and water will depend on the circumstances and would be affected by the temperature and length of the expected journey.

In addition, vehicles used to transport livestock require adequate ventilation and drainage for animal effluent. A lack of ventilation will cause undue stress and possibly suffocation,

particularly in extreme heat. Appropriate ventilation provides for the free flow of air to facilitate the removal of ammonia and carbon dioxide concentrations from animal effluent and provide adequate oxygen to the livestock. As adequate ventilation is essential to transporting livestock, it is difficult to contain the emission of animal effluent.

The loss of animal effluent was not included in the 2004 version of the Load Restraint Guide, and was not intended to be a load type that could be restrained. However, the performance standards are being strictly interpreted and applied to include small or minor spills that pose no safety or environmental issue, as evidence of a load restraint breach, resulting in fines and court notices under the HVNL and state road laws.

2.3 Current practice

In their submission to the Queensland Parliament's Transport and Utilities Committee (Australian Livestock and Rural Transporters Association, 2016), the Australian Livestock and Rural Transporters Association (ALRTA) stated there have been no known prosecutions of chain parties beyond the driver and operator in relation to effluent loss, despite chain of responsibility laws being in place since 1997.

ALRTA suggests this is because livestock is very different to other types of freight and supply chain parties and enforcement officers are uncertain about the coverage of chain of responsibility duties in the livestock production chain. ALRTA has advised that the livestock supply chain is complex and does not always flow in a single direction. Livestock may originate from farms, saleyards and feedlots and be transported to farms, feedlots, saleyards and processors, with various ownership and feeding arrangements. The ownership of livestock may change several times and at dissimilar points along the chain. The owner is not always in control of the livestock immediately prior to, or after, transport. In addition, livestock may be consigned to transporters by owners, agents, buyers or prime contractors. Depending upon the specific circumstances, these parties can be far removed from pre-transport preparation activities.

According to ALRTA, it is livestock preparation (mainly overfeeding of animals) that is the primary cause of effluent loss during transport. This is supported by research undertaken by the Meat and Livestock Association (Meat & Livestock Association, 2011).

2.4 Issue 1: Definition of party in the chain of responsibility

The current definition of party in the chain of responsibility does not clearly apply to supply chain parties such as those who prepare livestock for transport. While persons who feed animals may inadvertently be captured by chain of responsibility laws because of other activities (e.g. loading, consigning etc.), the law does not clearly apply consistently to the specific activity of preparing livestock for transport which is causing risk.

Because of the interaction between chain of responsibility laws and section 111, the driver of the heavy vehicle is still likely to be held solely responsible for a breach consisting of effluent loss despite having limited control over effluent generation.

Additionally, without this clarity around the application of chain of responsibility duties there is currently no incentive for people preparing livestock for transport to reduce feeding for animals because there is no clear responsibility in the law for them to do so for effluent management purposes. Arguably there are commercial incentives for people preparing livestock to overfeed animals because livestock are often traded on a cents per kilogram basis.

If the livestock production chain is to effectively minimise effluent spillage then all stakeholders need to be involved in developing and providing effluent minimisation solutions.

To provide the correct incentives for this to happen, legal responsibility for effluent management needs to be shared across the stakeholders. Clarification of chain of

responsibility duties for animal preparers can be seen as an important first step towards a broader strategy for effluent control on Australian roads.

2.5 Issue 2: Minor, incidental and unavoidable effluent spills

Strict application of section 115 of the HVNL means any load spillage or leakage, including small amount that pose no safety and environmental issues, is evidence of a load restraint breach.

Anecdotally industry has raised examples where the application of the law and the load restraint performance standards has been applied where safety is not an issue. One such example is where an incidental spill of effluent occurs from a heavy vehicle – even one with a functional, operational and not full effluent tank – and this leads to an alleged breach of the performance standards on the basis that the load (or part of the load) has fallen or become dislodged from the vehicle.

Even better preparation of livestock is unlikely to completely stop incidental effluent loss during transport. Animal welfare standards require that livestock have access to water and food at some point prior to being transported, have ventilation (i.e. so crates cannot be enclosed) and not allow effluent to pool on the floor (due to risk of animal slipping and falling into it). It is almost inevitable that some effluent loss will occur during a live animal transport journey.

Compounded by the lack of clarity around chain of responsibility duties, the result can be a driver of a livestock transport vehicle who has limited influence over effluent generation and consequently spillage receiving penalties for load restraint breaches for even a small amount of unavoidable effluent spillage.

Strict application of the load restraint performance standards also has unintended consequences for other load types (dust, minor water spillage, leaves etc.), where heavy vehicle operators are charged with an offence under section 111 for circumstances not envisioned nor intended to be captured by the offence - particularly where safety is not compromised.

The NTC has been unable to locate any evidence that a minor, incidental or unavoidable loss of effluent has affected safety or public amenity.

2.6 Case studies

A key issue in enforcement is the interpretation of the alleged effluent offence by the enforcement officer. Livestock industry members provided four examples of how loss of effluent has been treated in a variety of locations and road gradients.

Case study A

On 4 December 2014, a livestock driver picked up a load of cattle. At 4.20pm, the driver was pulled over for a random check by enforcement officers. The truck was fitted with an effluent tank which was emptied at the sale yards complex where the cattle were loaded (15 minutes from where the driver was pulled over). The enforcement officer issued the driver with an infringement notice under section 111(1)(a) of the Heavy Vehicle National Law for dried cow effluent stuck on the side of the crate. The penalty notice was for \$307.

The operator appealed the infringement on the grounds that due to animal welfare standards it was impossible to completely fill the sides of the livestock crates and still have sufficient ventilation. The enforcement authority reviewed the decision and confirmed that the infringement notice was justified. The operator then appealed the fine in the Magistrates' Court. The charge was withdrawn shortly before the hearing. While no penalty was applied, there was significant cost and concern for the operator which could

be prevented by more appropriate laws for circumstances such as this.

Case study B

On 2 September 2015, a livestock driver picked up a load of cattle in truck fitted with an effluent tank. At 9.20am, the driver was pulled over for a random check by enforcement officers. Enforcement officers issued the driver with a penalty notice for allowing to escape onto road any liquid/loose/waster material under the local road regulation. The penalty notice was for \$523.

The operator appealed the infringement in the local court on the grounds that he had taken reasonable steps to confine the effluent through the fitment of an effluent tank and that the effluent was out of his control under chain of responsibility. However, the magistrate was not persuaded that all care had been taken and upheld the decision of enforcement officers and ordered the operator to pay costs in excess of \$2,000.

Case study C

On 24 May 2015, a livestock driver picked up a load of cattle in a truck fitted with an effluent tank. The driver was transporting the cattle 450km. At 4.55pm, 370km into the trip the driver was pulled over for a random check by enforcement officers. Enforcement officers noticed that effluent was spilling over the crate and mud guard and issued the driver with a penalty notice for allowing liquid or any loose or waste material to escape onto the road under the state road law. The penalty notice was for \$511.

Case study D

Livestock industry members advised the following penalty notices have been issued for loss of effluent.

- A person must not drive on a road a heavy vehicle that does not, or whose load does not, comply with the loading requirements applying to the vehicle, resulting in a \$307 infringement under section 111(1)(a) of the Heavy Vehicle National Law
- A person must not drive on a road a heavy vehicle that does not, or whose load does not, comply with the loading requirements applying to the vehicle, resulting in a court notice under section 111(1)(c) of the Heavy Vehicle National Law, and
- A person must not allow to escape onto a road any liquid or any loose or waste material, resulting in a \$523 infringement under a state road law.

3 Options

Key points

The following section proposes three options to clarify the application of chain of responsibility duties in livestock supply chain and minor, incidental and unavoidable (in any practical sense) effluent spills being subject to compliance action.

Livestock production is different to other freight types and supply chains. Amendments to the HVNL are required if chain of responsibility duties and responsibility for effluent loss are to be clearly applied to livestock preparation in the livestock supply chain. Combined with clarity around what constitutes a load restraint breach in certain circumstances, this could help improve industry compliance and support better enforcement outcomes.

The NTC has identified the following three options to achieve this.

3.1 Option 1: Amend the definition of party in the chain of responsibility

Under this option a person who prepares live animals for transport would be directly identified in the HVNL definition of party in the chain of responsibility. This would mean that a person who prepares live animals for transport would be included in **all chain of responsibility provisions** relating to shared responsibility for safety of the heavy vehicle, taking into account their functions, the nature of the public risk created by their activity, and their capacity to control, eliminate or minimise the risk. Clarification of shared responsibility would not be limited to load restraint breaches.

This option is consistent with the intent of the chain of responsibility reforms, which are designed to ensure that any party in a position to control and influence on-road behaviour is identified and held accountable.

3.2 Option 2: Amend section 111 to specifically include other chain of responsibility parties

Section 111 of the HVNL is the principal provision dealing with load restraint, which specifically states it is an offence for a driver to drive on a road a heavy vehicle that does not comply with the loading requirements applying to the vehicle.

Under this option, section 111 could be amended to provide that if a driver commits the offence, the other parties in the chain of responsibility are also taken to have committed the offence (subject to a so far as is reasonably practicable test). This would essentially replicate the effect of section 183 (which will be repealed when the amendment Act commences on 1 October 2018).

The parties held liable could be restricted to those involved in preparing the animals for transport (including for example a consignor, a loader and the person actually preparing the animal for transport).

Such an amendment would provide clear responsibility for such parties for their role in the specific offence of breaching loading requirements. Providing for the offence in section 111 may also provide the opportunity to issue infringement notices to other parties, which could be an aid to enforcement.

However, this option would not provide clarity regarding chain of responsibility duties for parties preparing livestock in relation to other heavy vehicle offences outside a breach of the

load restraint requirements (i.e. state road laws and environmental laws are outside the mandate of this amendment).

3.3 Option 3: Allow for a minor, incidental or unavoidable loss of part of a load

Section 115 of the HVNL provides that evidence that a load or part of a load has fallen off a heavy vehicle is evidence that the load was not properly secured. Strict application of this section means any load spillage or leakage, including small amounts that pose no safety and environmental issues, is evidence of a load restraint breach.

Based on this evidence heavy vehicle operators can be charged with an offence under section 111 for circumstances not envisioned nor intended to be captured, particularly where safety is not compromised. Examples include:

- the creation and subsequent emission of a small quantity of dust from an empty tip truck
- the leakage or spillage of a small quantity of water from the body of a water carrying tanker
- the escape of a small quantity of leaves or green matter from a truck carrying mulched trees, and
- the inevitable (given the nature of living animals) spillage or discharge of effluent arising from the transport of livestock.

The common element in these examples is that the fall or dislodgement of part of a load under these circumstances is minor, incidental and unavoidable (in any practical sense) and extraneous to the overriding safety objectives of the load restraint provisions of the HVNL.

To address this issue, the HVNL could be amended to provide that the minor, incidental and unavoidable escape (in any practical sense), release or discharge of part of a load in circumstances such as (but not limited to) those set out in the above examples does not constitute an offence under section 111.

Consultation Questions

1. Is reform of existing laws required to clarify the application of chain of responsibility duties for parties in the livestock supply chain?
2. Is reform of existing laws required to allow for minor, incidental and unavoidable (in any practical sense) spills that do not compromise the overriding safety objectives of the load restraint provisions?
3. Are minor, incidental and unavoidable effluent spills a road safety issue?
4. Should a small amount of effluent or other material, such as hay, be allowed to incidentally fall out of the truck in order to meet animal welfare standards, i.e. to allow adequate ventilation and reduce stress?
5. Do you have evidence of small, minor and/or incidental effluent spills causing injury or damage or otherwise compromising road safety?
6. Of the three proposed options, what is your preferred approach and why?
 - a. Option 1: Amend the definition of party in the chain of responsibility
 - b. Option 2: Amend section 111 to specifically include other chain of responsibility parties
 - c. Option 3: Allow for a minor, incidental or unavoidable loss of part of a load

7. How would the proposed options impact upon you and/or your business?
8. Is there a cost-effective commercial product alternative that would allow ventilation while limiting the spillage of effluent?
9. What alternative approaches do you support to improve effluent control on Australian roads?

4 Consultation and next steps

Key points

The NTC is seeking submissions regarding possible amendments to the HVNL to:

- clarify the application of chain of responsibility duties for parties in the livestock supply chain, and
- allow for minor, incidental and unavoidable (in any practical sense) spills that do not compromise the overriding safety objectives of the load restraint provisions.

4.1 Questions to consider

The NTC is inviting submissions on this paper by **Friday 6 July 2018**. We are seeking responses to the following questions:

Issue 1: Chain of responsibility parties

1. Is reform of existing laws required to clarify the application of chain of responsibility duties for parties in the livestock supply chain?

Issue 2: Minor, incidental and unavoidable effluent spills

2. Is reform of existing laws required to allow for minor, incidental and unavoidable (in any practical sense) spills that do not compromise the overriding safety objectives of the load restraint provisions?
3. Are minor, incidental and unavoidable effluent spills a road safety issue?
4. Should small, minor or incidental effluent spills be prosecuted?
5. Should a small amount of effluent or other material, such as hay, be allowed to incidentally fall out of the truck in order to meet animal welfare standards, i.e. to allow adequate ventilation and reduce stress?
6. Do you have evidence of small, minor and/or incidental effluent spills causing injury or damage or otherwise compromising road safety?

Options

7. Of the three proposed options, what is your preferred approach and why?
 - a. Option 1: Amend the definition of party in the chain of responsibility
 - b. Option 2: Amend section 111 to specifically include other chain of responsibility parties
 - c. Option 3: Allow for a minor, incidental or unavoidable loss of part of a load
8. How would the proposed options impact upon you and/or your business?
9. Is there a cost-effective commercial product alternative that would allow ventilation while limiting the spillage of effluent?
10. What alternative approaches do you support to improve effluent control on Australian roads?

4.2 How to submit

Any individual or organisation can make a submission to the NTC.

To make an online submission, please visit www.ntc.gov.au and select 'Submissions' from the top navigation menu.

Or, you can mail your comments to: Attn: Maintenance Team, National Transport Commission, Level 3/600 Bourke Street, Melbourne VIC 3000.

Where possible, you should provide evidence, such as data and documents, to support your views.

Unless you clearly ask us not to, we will publish all submissions online. However, we will not publish submissions that contain defamatory or offensive content.

The *Freedom of Information Act 1982 (Cwlth)* applies to the NTC.

Appendix A References

Australian Livestock and Rural Transporters Association, 2016. *Submission to the Queensland Transportation and Utilities Committee - Heavy Vehicle National Law and Other Legislation Amendment Bill 2016*. [Online]

Available at:

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