



# Independent observer deployment policy

Live Animal Export Branch

## 1 Purpose

This policy outlines the independent observer deployment requirements for livestock exports by sea. Deployment of observers provides the Department of Agriculture, Fisheries and Forestry, as the regulator, with an appropriate level of assurance in relation to exporter arrangements for livestock consignments exported by sea.

## 2 Scope

This policy applies to exporters of livestock by sea. It should be read in conjunction with relevant export legislation and standards listed under [related material](#).

This policy will come into effect from 1 July 2026.

## 3 Role of independent observers

Independent observers (observers) are authorised officers under the *Export Control Act 2020*. Sections 313 and 314 of this Act provide that the Secretary may direct an authorised officer to carry out, monitor or review certain export operations.

Observers will monitor, report and keep records on the:

- implementation of individual exporter arrangements, and their effectiveness at managing animal health and welfare onboard livestock export vessels
- conditions of the voyage (including the condition of the vessel).

Where an authorised officer (observer) is directed to undertake these activities for a particular livestock export consignment, the exporter must allow the observer to accompany the livestock on the relevant voyage (subsection 9-49(2) of the *Export Control (Animals) Rules 2021*).

Observers undertake assurance activities through observational reporting. This reporting details issues identified and the management or rectification of issues to determine whether the management or rectification was in line with the exporter's documented arrangements.

When deployed, observers provide important independent assurance over the voyage phase of the livestock export supply chain.

## 4 Observer deployment streams

Observer deployments occur under 2 streams:

- 1) [Routine deployments](#), occurring each financial year
- 2) [Targeted deployments](#), occurring on an *ad hoc* basis.

Where practical, the department will rotate observers between exporters and livestock species loaded.

### 4.1 Routine deployments

Each livestock exporter will have one routine observer deployment each financial year. Voyages for deployment will be prioritised based on the highest risk group of an exporter's operations as outlined in [Table 1](#).

Routine deployments are not associated with exporter compliance or previous voyages with adverse outcomes. Routine deployments maintain oversight of all exporters.

**Table 1 Routine deployment groups based on risk**

| Group                         | Export arrangements   |
|-------------------------------|---|
| Lower-risk voyages (group 1)  | Simple arrangements, involving cattle and/or sheep on short-haul voyages (less than 10 voyage days) with a single port discharge.   |
| Medium-risk voyages (group 2) | One or more of these complex arrangements: <ul style="list-style-type: none"> <li>• exporting buffalo</li> <li>• exporting livestock requiring management plans applicable to the voyage (such as pregnant, horned or heavy cattle)</li> <li>• long-haul voyages (10 voyage days or more, but less than 31 voyage days)</li> <li>• multi-port discharge voyages.</li> </ul>   |
| Higher-risk voyages (group 3) | One or more of these more complex arrangements: <ul style="list-style-type: none"> <li>• extended long-haul voyages (31 voyage days or more)</li> <li>• exports of sheep to and through the Middle East from 1 May to 31 October to which additional conditions apply</li> <li>• exports of higher-risk livestock species where industry and departmental knowledge, information, and experience is currently limited. These species include camelids, deer and goats.</li> </ul> |

Where applicable to selecting voyages for routine deployment, the department might consider other voyage risk factors. These include loading ports and voyage routes that predispose the livestock to climatic and temperature extremes. For example, those departing from Australian ports south of latitude 26°S and crossing the equator.

### 4.2 Targeted deployments

Targeted deployments provide additional oversight of exporter arrangements where the department considers it appropriate. These deployments occur on an *ad hoc* basis.

Exporters may be subject to targeted deployments:

- where the department has identified exporter non-compliance

- where adverse welfare outcomes have been identified on a previous voyage that may be related to an exporter's on-board arrangements
- as a condition of granting an exemption to a legislative requirement
- on an exporter's first voyage by sea or the first voyage for a given vessel
- in exceptional circumstances.

## Response to non-compliance or adverse voyage outcomes

Targeted deployment may be required as a result of exporter non-compliance. This may include non-compliance with the:

- *Export Control Act 2020* or the Export Control (Animals) Rules 2021
- Australian Standards for the Export of Livestock (ASEL)
- exporter's approved arrangement (AA) or approved export program (AEP)
- exporter's voyage instructions.

Adverse welfare outcomes on a previous voyage may also require a targeted deployment.

Targeted deployments allow the department to verify the implementation, appropriateness and effectiveness of corrective actions taken by the exporter in response to regulatory or compliance action. They are also used to monitor ongoing exporter compliance.

Alternatively, a targeted deployment may be necessary to provide independent context about deficiencies with exporter arrangements for managing issues, or with the implementation of arrangements. Targeted deployments do not limit the identification and actioning of further issues or non-compliance observed throughout the voyage.

A targeted deployment may not be necessary after every instance of exporter non-compliance or an adverse voyage outcome. It is a verification tool available to the department at its discretion.

## New exporters by sea

Unless otherwise advised, exporters new to exporting livestock by sea must have an observer accompany their maiden voyage. This is in addition to the [routine deployment](#) requirement. This targeted deployment aims to ensure that new exporters by sea have appropriate processes and procedures in place to effectively manage the export of livestock.

## New vessels

Unless otherwise advised, an exporter using a new vessel must have an observer accompany the vessel's maiden voyage. This is in addition to the [routine deployment](#) requirement. This targeted deployment will provide additional assurances of exporter arrangements relating to vessel preparation, loading and on-board management for the export of livestock.

In this policy, a vessel is considered 'new' if:

- it has not carried Australian livestock for export in the previous 2-year period
- it has regained an Australian Certificate for the Carriage of Livestock where one was not held

- livestock services have undergone a substantial change (as per [Marine Order 43 \(Cargo and cargo handling — livestock\) 2018](#)).

## Exceptional circumstances

The department may direct an observer to accompany certain voyages in exceptional circumstances not already identified in this policy. The department will contact the exporter where observer deployment is required for an upcoming voyage.

## 4.3 Deployments on shared vessels

Where observer deployment occurs on multi-exporter voyages (shared vessels):

- For routine deployments – this will contribute to the routine deployment requirement for all exporters with a consignment on the voyage that need to fulfill a routine deployment and the risk group of the voyage is appropriate
- For targeted deployments – this will not contribute to the routine deployment requirement for the other exporters with consignments on the voyage (unless otherwise advised).

# 5 Fulfilling deployment requirements

## 5.1 Routine deployments

Exporters must fulfill routine deployment requirements each financial year. If an exporter has not fulfilled their routine deployment requirements, the department will take steps to direct an observer to accompany a consignment, and the Secretary may refuse to approve the notice of intention (NOI) to export the consignment if the exporter cannot accommodate an observer.

## 5.2 Targeted deployments

Where targeted deployments are required, the department will take steps to direct an observer to accompany a consignment, and the Secretary may refuse to approve the NOI to export the consignment if the exporter cannot accommodate an observer (unless otherwise advised).

## 5.3 Unavoidable barriers to deployment

In some circumstances outside the exporter's control, such as uncertain security situations or international travel restrictions, observer deployment may not be possible.

Where there are unavoidable barriers for routine deployment on a voyage in the highest risk group for an exporter (as per [Table 1](#)), the department will plan to deploy an observer on a consignment in the second highest risk group.

The department may apply additional reporting requirements where there are unavoidable barriers that prevent:

- Routine deployment on any voyage for an exporter in a financial year
- Targeted deployment.

These requirements may include photographs, questionnaires, use of environmental loggers and unannounced information requests that require targeted information within a specified timeframe.

## 5.4 Alternative arrangements to deployment

The department will consider alternative arrangements to observer deployment on a case-by-case basis under extenuating circumstances. Arrangements may include a partial deployment where an observer boards a vessel to observe loading in Australia and again during discharge at an overseas port (without accompanying the voyage). The department does not consider a partial deployment equivalent to a full routine deployment.

The department may consider other alternative arrangements where the exporter can demonstrate that the proposed arrangement will provide an equivalent level of independent assurance to that provided by an observer.

## 6 Policy review

The department will monitor and evaluate the effectiveness of this policy, to verify it is achieving its objectives and providing an appropriate level of assurance.

## 7 Related material

- [Export Control Act 2020](#)
- [Export Control \(Animals\) Rules 2021](#)
- [Australian Standards for the Export of Livestock \(ASEL\)](#)
- [Exporting a livestock consignment](#)
- [Independent observers](#)
- [Regulating live animal exports](#)
- [Marine Order 43 \(Cargo and cargo handling — livestock\) 2018](#)

## 8 Version control

| Version | Date of issue | Author                    | Reason for change |
|---------|---------------|---------------------------|-------------------|
| 1.0     | May 2026      | Live Animal Export Branch | First publication |

### Acknowledgement of Country

We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia's agriculture, fisheries and forestry industries.

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