

The Australian Veterinary Association Limited

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15 July 2011

Committee Secretary
Senate Standing Committee on Rural Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Committee Secretary

Inquiry into Animal welfare standards in Australia's live export markets

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 6500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the association.

Animal welfare is central to the mission of the AVA. As with so many in the community, members of the AVA have diverse opinions on exports of live animals for slaughter, however all agree that wherever slaughter takes place it must be humane. The AVA was shocked by the footage of the slaughter of cattle in Indonesia as shown in the recent *Four Corners* program. The program and subsequent information from industry and government have led to review of the AVA position statement on live animal export and policy on human slaughter.

Members are generally of the view that Australian veterinary expertise and skills in animal husbandry should be employed wherever practicable to improve the welfare of animals in other countries those to which Australian animals have been exported.

The AVA is willing and able to provide independent expert advice to government and industry to assist in solving both the animal welfare concerns for Australian cattle in Indonesia, as shown on *Four Corners*, and the welfare issues resulting from the suspension of exports to Indonesia.

The attached submission addresses several of the terms of reference of the Inquiry. I would be available to address the Committee in person if this would be of assistance.

Yours faithfully,

Dr Barry Smyth
President

Senate Standing Committee on Rural Affairs and Transport Committee

Inquiry into Animal welfare standards in Australia's live export markets

Submission from The Australian Veterinary Association (AVA)

Executive Summary

The AVA recognises that there are social, technical, environmental, economic, political, legal and ethical issues associated with the export of livestock, and a diversity of views among our members on this complex matter

The AVA believes that the welfare of the animals in the trade must be protected at all stages from production to slaughter wherever this may occur.

The AVA has independent technical, ethical and professional expertise in animal health and welfare. We have contributed this expertise to the national consideration of and response to this issue by industry and government. We have made recommendations that we believe may help to demonstrate transparency, traceability, accountability and verification of the standards implemented to ensure the health and welfare of the Australian animals and also improve global animal welfare.

The AVA recognises that Australia and Indonesia are members of the World Organisation for Animal Health OIE, and supports the standards set out in the OIE *Terrestrial Animal Health Code* (2010). Some Australian standards are above the OIE standards and AVA supports assistance to Indonesia and other importing countries to also achieve higher standards.

The AVA has reviewed our position statement on live animal export and our policy on humane slaughter after carefully and extensively debating these complex issues. Both of these documents are attached.

The AVA policy is that animals should be stunned prior to slaughter, and we support industry and government assistance to all importing countries to implement this 'best practice' procedure.

The AVA supports use of the *Australian Standards for the Export of Livestock* (ASEL) which were published in November 2006 and reviewed in 2011. The standards were developed as part of the Australian Government's response to the Keniry Review (2003) of the livestock export industry.

The AVA supports continuing efforts to convert animal welfare codes of practice to Australian Standards and Guidelines for the Welfare of Livestock to improve regulation of animal welfare.

The AVA feels that there should be a suitably qualified and experienced veterinarian on all voyages, not just the long distance voyages to the Middle East.

Recommendations

Recommendation 1: The AVA policy is that animals must be humanely rendered unconscious prior to exsanguination. We believe that industry and government must assist importing countries to implement this 'best practice' procedure. The AVA is aware that stunning is not mandated in the OIE Code.

Recommendation 2: Accredited veterinarians in the live export industry should be contracted by government, not by exporters. This would demonstrate independence, and could be cost recovered by government. Veterinary services should be included in audits.

Recommendation 3: The AVA considers that the health and welfare of exported animals are paramount. This must be demonstrable to the Australian community and is essential to a viable export industry. Compliance and enforcement through auditing, independent oversight and possible suspension and withholding of export permits, allows the Australian Government to maintain control of the export industry.

Recommendation 4: A requirement testifying to maintenance of chain assurance as to the control of Australian cattle should be included in each Consignment Risk Management Plan (CRMP) in countries where chain assurance is considered necessary. The statement could include reference to pre-slaughter stunning where this is implemented. This would enable auditing to ensure exporter compliance.

Recommendation 5: Further granting of Approved Export Programs (AEP) should become dependent on demonstrating there is no 'leakage' of animals from the chain assurance system and electronically tracing animals from preparation on farm in Australia to immediate post slaughter in the importing countries.

Recommendation 6: Animals exported for breeding purposes would transfer to the importer's legal responsibility, but in countries where through chain assurance is required this should be implemented in such a way as prevent diversion to unaudited slaughterhouses.

Recommendation 7: The AVA supports the guiding principles contained in the *Australian Standards for the Export of Livestock*, with verification and enforcement.

Recommendation 8: A suitably qualified and experienced veterinarian should be on all voyages to ensure that the highest standards of animal health and welfare can be put into place. Their responsibilities should not be transferred to non-veterinarians of varying training and capabilities.

Introduction

The prime concern of the AVA, whether animals are slaughtered in Australia or overseas, is the welfare of animals.

The AVA recognises that there are social, technical, environmental, economic, political, legal and ethical issues associated with national decisions on whether to allow exports. The AVA can provide independent technical, ethical and professional expert advice on animal health and welfare, balanced with requirements for productivity and food safety and quality. We can also put this advice into the context of the circumstances under which the animals are handled.

The AVA nominated Dr Tristan Jubb to be part of the group of veterinarians sent to Indonesia to visit abattoirs and report on the boxes employed to restrain cattle during slaughter. The AVA also nominated Dr Kevin Doyle to participate in the subgroup working on standards and audit guidelines. The latter group worked on requirements of third party auditors, audit guidelines and an audit checklist, confirming that the relevant OIE Code chapter is dealt with by the industry Standard Operating Procedures, and translating the OIE principles into targets.

Animal welfare is central to the mission of the AVA and, with the great diversity among disciplines and roles undertaken by veterinarians, there are diverse opinions on the ethics and welfare aspects of exporting live animals for slaughter. All agree that wherever slaughter takes place it must be humane. Members were shocked by images of cattle slaughter in Indonesia in the recent 4 Corners Program.

Australian veterinarians are in constant contact with the expectations of the community and accept the responsibility of being front line advocates for animal welfare.

Relevant AVA policies and position statements

The AVA position statement on live animal export states:

There must be strict adherence to the following requirements to protect the health and welfare of animals when they are exported to provide food or genetic material.

- Importing countries should be members of the World Organization for Animal Health (OIE) and have a legislative commitment to ongoing monitoring and enforcement of animal welfare standards.
- Animal health and welfare should be protected from farm gate to slaughter through a 'whole-of-chain' enforcement of the OIE animal welfare standards at a minimum.
- Importing countries should apply stringent welfare standards that, as a minimum, conform to the World Organisation for Animal Health (OIE) animal welfare standards for the animals they receive.
- Within Australia, higher welfare standards than mandated by the OIE are required and Australian authorities must work to promote similar standards in importing

countries. When animals are to be slaughtered they must be humanely rendered unconscious until death.

- The Australian Standards for the Export of Livestock (ASEL) and Australian Maritime Safety Authority requirements must be enforced by the Australian Government and regularly reviewed and updated.
- There must be an effective dispute resolution process agreed between governments.
- Contingency plans must be in place to ensure that the welfare of exported animals is protected if they cannot be unloaded at the designated port.
- There needs to be continued research and development into the health and welfare of livestock at all stages of the export process.

The AVA reviewed this position statement after the airing of the the *Four Corners* program and suspension of the export of cattle to Indonesia for feeding and slaughter. The diversity of opinion among members is reflected in a position statement on this issue rather than a policy. The AVA Policy Advisory Council reviewed the policy in May 2011 and the full revised version, which is at attachment A, was ratified by the AVA Board at its meeting on 8th July 2011

The AVA policy on humane slaughter is:

Slaughter of animals must be carried out in a humane manner. Animals must be humanely rendered unconscious until death.

The full policy ratified by the AVA Board on 11th July 2011 is at attachment B.

Veterinarians

Veterinarians in the livestock export industry must be AQIS Accredited Veterinarians (Livestock) (AAVET). The veterinarian must complete the Accreditation Program for Australian Veterinarians (APAV), managed by Animal Health Australia. This trains them to interact with government agencies and departments. They must then complete the AAVET module. This module is “designed to inform veterinarians involved in the pre-export preparation and/or shipboard services for livestock of their legislative responsibilities as an AQIS Accredited Veterinarian (Livestock). It also provides relevant background information about the livestock export process”.

The AAVET veterinarian must be an Australian citizen and be registered by a state or territory veterinary surgeons' board.

The AVA supports this system of accreditation but believes that the independence and impartiality of the AAVET should be supported by being contracted by government, even if the cost is recovered from exporters.

The AVA supports the 'Fit to Load' program that was first trialled in Western Australia and then rolled out to the rest of Australia. The application of ASEL and the development

of the industry draft Livestock Export Veterinary Handbook help to provide clear standards and guidelines to protect animal health and welfare.

Why export livestock?

AVA members deal with farmers daily and believe that Australia is a very efficient producer of animal derived food. The AVA is well aware of Australia's role in world food security and as a provider of safe food from animals of high animal health status. It is anticipated by FAO that world food production must increase by between 70% and 100% to feed the expected nine billion world population in 2050.

Advances in breeding and transport of animals over the last 10 to 20 years in the live export industry demonstrate that Australian farmers have responded to the requirements of importing countries to supply their specific needs. In the case of Indonesia, Australian farmers have bred animals specifically for the export trade for entry into feedlot facilities in Indonesia. Importation of 250 to 350 kg animals to be fattened in their feedlots is the option preferred by Indonesia for their population to access a high quality protein source at an affordable price. It is also seen as assisting in the development of the local industry.

The AVA is conscious that slaughtering in Australian facilities and exporting chilled and frozen meat can add value to Australia's products and provide employment. However the infrastructure, development of local industries, and cultural and religious practices in some countries, including Indonesia, lead them to importing live animals for local slaughter. Most are conscious that Indonesia will import animals from other countries should Australia cease cattle exports. This could present a disease risk especially if the cattle are derived from South America where foot and mouth disease is present.

The animal health status of Indonesia is crucial to Australia. Indeed Australia works with Indonesia, Papua New Guinea and Timor Leste through the Northern Australia Quarantine Strategy to monitor and help control infectious diseases in the four countries. Australia assisted Indonesia with the eradication of foot and mouth disease as a cooperative measure to protect both countries.

The AVA is also well aware of the lack of slaughter facilities in northern Australia and the high cost of running a facility that would only work for 6 months of the year due to the wet season. There are animal welfare considerations in trucking cattle to southern abattoirs.

Humane slaughter

There may be a diversity of opinion amongst our members regarding livestock exports, but all agree that animals must be slaughtered humanely. AVA policy is that animals must be stunned prior to slaughter.

Whole of chain oversight, auditing and verification

The AVA sees its role as an independent body that has expertise, through its membership, in verification of whole of chain management of animals from preparation through to immediate post slaughter. AVA can facilitate provision of personnel to verify traceability, systems to prevent 'leakage' of animals and strict adherence to the Australian Standards for the Export of Livestock and OIE standards of animal health and welfare. It has little expertise in auditing and is aware of more suitable independent international audit organisations.

Animal welfare

The AVA can draw on the expertise of its members who have specialised experience in animal welfare and ethics as well as members with international trade experience. The protection of animal welfare is paramount and is expected by the Australian population.

Maintenance of acceptable international welfare standards and independent verification of compliance is a prerequisite for continuing livestock export.

Response to the terms of reference of the Inquiry

1. Investigate and report into the role and effectiveness of Government, Meat and Livestock Australia, Livecorp and relevant industry bodies in improving animal welfare standards in Australia's live export markets, including:

The AVA is not in a position to quantify the effectiveness of the MLA efforts in improving animal welfare in countries importing livestock from Australia, but we can make some comments on this issue. The AVA information comes from participation on the Livestock Export Industry Consultative Committee convened by the Department of Agriculture, Fisheries and forestry (DAFF), and various working groups. AVA members have been among those trained for work on livestock ships and transports and have performed these roles.

AVA participation is directed to provision of independent advice to government and industry.

The AVA is conscious of Australia's contribution to the international animal welfare debate, particularly through membership of the World Organisation for Animal Health - OIE and its Regional Commission for Asia, the Far East and Oceania. This underpins industry efforts in importing countries and regions. The Australian Animal Welfare Strategy (AAWS) has influenced development of OIE codes on animal welfare and regional animal welfare strategies in the Middle East and in Asia, the Far East and Oceania.

The AVA is aware that MLA has a presence in the Middle East and in Indonesia. AVA members have visited these areas in various roles. They have witnessed some activities and participated in efforts to improve the welfare of Australian animals after arrival and also local animals. Training in animal husbandry and slaughter techniques has played a part.

The AVA is aware that the Australian Government is unable to have a regulatory role in sovereign countries and that in-country controls can only be exercised by the actions of commercial companies and the government of the countries concerned. Australian regulation is through the exporting company and its export licenses and the granting of export permits. Thus the availability of information in Australia is crucial. Reporting to Parliament on a regular basis on shipments and other matters is required, and this public transparency is strongly supported by the AVA as a means of maximising the welfare of the animals concerned.

The *Australian Meat and Live-stock Industry Act 1997* requires a report on transport of livestock on any sea voyage to a port outside of Australia to be tabled in each House of Parliament every 6 months. Under the legislation, a reportable mortality event occurs if the mortality rate in a consignment is equal to, or exceeds, the level specified in the Australian Standards for Export of Livestock.

For cattle, sheep and goats these reportable mortality levels are:

- Sheep and goats: 2%
- Cattle voyages greater than or equal to ten days (long haul): 1%
- Cattle voyages less than ten days (short haul): 0.5%

According to the reports to AQIS, mortality rates in livestock exported from Australia have fallen in recent years.

Between 2000 and 2010 the average mortality rate for short haul cattle fell from 0.9% to 0.04% and the average mortality rate for long haul cattle from 0.42% to 0.28%. For sheep, the average mortality rate has fallen from 1.34% to 0.91%. The average mortality rate for goats has fallen from 1.98% to 0.69%. The AVA is aware that industry and government policy is to bring about further reductions in illness and mortality rates during these overseas voyages.

These improvements are the result of research and development in all aspects of preparation of animals for export. Developments in pelletised feed, the design and structure of ships and selection of animals play a part. Some specific Australian developments include the “Hot Stuff” model used to establish the appropriate stocking level of animals for particular voyages.

a) The level, nature and effectiveness of expenditure and efforts to promote or improve animal welfare standards with respect to all Australian live export market countries

The AVA is not able to comment in detail but wishes to reinforce the value of Australian teams supported over many years on location in the Middle East and in Indonesia. There is no doubt that their presence has improved the handling of animals in those regions. Australian animals, which are not accustomed to close herding, particularly benefit from this. Australian support has included provision of equipment and training and through government to government Memoranda of Understanding (MOUs) with many countries to which we export animals for slaughter. The MOUs are designed to ensure that where quarantine or other problems occur the animals will not be left stranded as occurred with

the *Cormo Express*. Rather they will be landed into agreed quarantine feedlots and handled with due care.

i) expenditure and efforts on marketing and promoting live export to Australian producers;

The AVA is unable to comment on the quantum of expenditure but has been witness to efforts and material promoting animal welfare.

Effort has been made by the Commonwealth and state governments, industry, and NGOs to develop Standards and Guidelines for the welfare of livestock at various stages of the production process. This work is coordinated by Animal Health Australia, of which governments, industry and the AVA are members. Codes of Practice developed over many years are being changed to standards and guidelines to facilitate regulation and, where necessary prosecution. They also promote continuous improvement rather than rely on established minimum standards as has been the case with Prevention of Cruelty to Animals Acts.

ii) ongoing monitoring of the subscription to, and practise of, animal welfare standards in all live export market countries;

Reference has been made above to in-country activities which provide the only viable of monitoring in export market countries.

iii) actions to improve animal welfare outcomes in all other live export market countries and the evidence base for these actions.

AVA views are mentioned in the general comments in a) above. Regulation of the industry is through monitoring and control over export licenses and export permits. This enables exporters that transgress to be regulated within Australia. The Australian teams supported by industry through MLA provide training and equipment. This improves the welfare of local as well as imported animals. In some countries husbandry practices are traditional and not based on modern methods. No other country provides this kind of support to importing countries.

b) The extent of knowledge of animal welfare practices in Australia's live export markets including:

i) formal and informal monitoring and reporting structures;

AVA views are mentioned in the general comments above. Visits by AVA members have given some indication of the systems employed in importing countries. Veterinarians accompany shipments to new or higher risk countries or where there are special concerns. Accredited stockmen accompany all shipments by sea. On board accredited veterinarians and stockmen report on the out turn of shipments. Visits are made to feedlots in some cases.

Oversight would be improved by having veterinarians accompany all shipments sent by sea, and we recommend that this occur. Veterinary services should be included in the audits.

ii) formal and informal processes for reporting and addressing poor animal welfare practices.

Australian teams on site have an in-country role. Reports to Parliament address the onboard situation. AVA views are mentioned in the general comments above.

2. Investigate and report on the domestic economic impact of the live export trade within Australia including:

AVA information on the economics of the livestock trade relies on MLA and Department of Agriculture, Fisheries and Forestry, so we are not able to comment in detail on economic matters.

a) Impact on regional and remote employment especially in northern Australia;

We can advise that veterinary practitioners associated with the trade, their businesses, and their communities are impacted. The AVA, via these veterinarians, may be able to provide another perspective on economic impacts if sufficient time is available to conduct a study. Generally speaking, the trade provides income that improves veterinary services in northern Australia, and supports both passive and active disease and welfare surveillance in remote areas.

b) Impact and role of the industry on local livestock production and prices;

Practitioners advise that the export markets enable higher levels of animal welfare on farm and in transport because of the greater value of animals. Examples include the live sheep trade in the south which enable older animals to be culled and younger healthier flocks to be maintained. Cattle produced in the north are in general less suited for transport to the south. Heat tolerant and tick resistant cattle are not well suited for direct movement to colder regions in the winter months. Breeding has focussed on animals suited to the live export trade. Long distance road transport has animal welfare implications.

c) Impact on the processing of live stock within Australia.

Veterinary practitioners are aware of the difficulty in access to and the high costs of labour for abattoirs in northern Australia and the seasonal nature of the industry in the north due to the wet season. They are also aware of the specific preferences of some importing countries of live cattle for use in wet markets that cannot be replaced by chilled product. Therefore, the impact on local processing is considered to be minimal at this point.

3. Other related matters.

The provision of veterinary services to the live export industry in the north has provided disease and animal welfare surveillance at a time when government veterinary services are limited. Early recognition and diagnosis is crucial in eradication of outbreaks of emergency animal diseases (EADs). Delays in detecting outbreaks have been shown to increase costs and reduce the possibility of eradication. Early recognition is crucial for Australia's preparedness to deal with outbreaks of EADs such as foot and mouth disease.

The *Australian Standards for the Export of Livestock* (ASEL) were published in November 2006 and were reviewed in 2011 (Version 2.3). The standards were developed as part of the Australian Government's response to the Keniry Review (2003) of the livestock export industry. The AVA supports this document as it; "represents the basic health and welfare requirements for the conduct of the livestock export industry".

The AVA feels that the employment of the veterinarians in the export trade should be through contracting by government rather than by exporters. This could be 100% cost recovered by the government from exporters if necessary.

The AVA believes that a qualified and experienced veterinarian should be on all voyages. Responsibility of ensuring the highest standards of animal health and welfare should not be transferred to non-veterinarians of varying training and capabilities. Veterinarians have the expertise and capability to address and report animal health and welfare issues that may arise during the exportation of animals. Their presence will provide an extra level of safeguard to animal health and welfare.

The Australian Veterinary Association

15th July 2011

ATTACHMENT A

AVA policy on humane slaughter

Policy

Slaughter of animals must be carried out in a humane manner. Animals must be humanely rendered unconscious until death.

Background

The slaughtering of animals is usually to provide food, although animal slaughter can also be used for population control and disease eradication. Arrangements should be in place so that animals are spared unnecessary excitement, pain, stress or suffering during movement, restraint, stunning and slaughter.

Regardless of religion or cultural beliefs, animals must be humanely rendered unconscious prior to exsanguination. A sheep can remain conscious for 7 to 20 seconds after its throat is cut, while loss of consciousness in cattle under similar circumstances can take up to two minutes.

There are species-specific Australian guidelines on how to slaughter animals humanely. These are outlined in the animal welfare model codes of practice as well as in industry standards.

References

Scientific Panel on Animal Health and Welfare. 2004. Opinion of the Scientific Panel on Animal Health and Welfare on a request from the Commission related to the welfare aspects of the main systems of stunning and killing the main commercial species of animals. *The EFSA Journal*, 45, 1-29. (www.efsa.eu.int accessed on 21 April 2011).

Australian Animal Welfare Strategy. Preamble. <http://www.daff.gov.au/animal-plant-health/welfare/aaws/online/reamble>. Accessed 8 October 2009.

Ratified by the AVA Board 8 July 2011

ATTACHMENT B

AVA position statement on live animal export

Position statement

There must be strict adherence to the following requirements to protect the health and welfare of animals when they are exported to provide food or genetic material.

- Importing countries should be members of the World Organization for Animal Health (OIE) and have a legislative commitment to ongoing monitoring and enforcement of animal welfare standards.
- Animal health and welfare should be protected from farm gate to slaughter through a 'whole-of-chain' enforcement of the OIE animal welfare standards at a minimum.
- Importing countries should apply stringent welfare standards that, as a minimum, conform to the World Organisation for Animal Health (OIE) animal welfare standards for the animals they receive.
- Within Australia, higher welfare standards than mandated by the OIE are required and Australian authorities must work to promote similar standards in importing countries. When animals are to be slaughtered they must be humanely rendered unconscious until death.
- The Australian Standards for the Export of Livestock (ASEL) and Australian Maritime Safety Authority requirements must be enforced by the Australian Government and regularly reviewed and updated.
- There must be an effective dispute resolution process agreed between governments.
- Contingency plans must be in place to ensure that the welfare of exported animals is protected if they cannot be unloaded at the designated port.
- There needs to be continued research and development into the health and welfare of livestock at all stages of the export process.

Background

Animals are exported for food and genetic material.

It is important to engage with the livestock export industry and international veterinary associations to promote the welfare of animals globally and to help safeguard the welfare of all exported animals.

If Australia removes itself from the trade, any shortfall of supply will be sourced from other countries and the welfare standards applying to those animals are likely to be considerably less than those we impose.

Australia is working to improve animal welfare in importing countries and if the live export trade ceases then this input may be compromised.

Effective operational protocols should be in place at all times to safeguard the welfare of exported animals. These protocols should include the accreditation of abattoirs, training of employees and the implementation of an independent animal welfare auditing process, as is the case in Australian processing establishments.

References

Australian Government. Department of Agriculture, Fisheries and Forestry. Australian Standards for the Export of Livestock. Version 2.3 <http://www.daff.gov.au/animal-plant-health/welfare/export-trade/livestock-export-standards>, accessed 11 July 2011.

World Organization for Animal Health, 2010, 'Animal welfare', Section 7, *Terrestrial Animal Health Code*, http://www.oie.int/index.php?id=169&L=0&htmfile=titre_1.7.htm accessed 11 July 2011.

Ratified by the AVA Board 11 July 2011