

SUBMISSION FOR THE INQUIRY INTO ANIMAL WELFARE STANDARDS IN AUSTRALIA'S LIVE EXPORT MARKETS

I am writing to voice my vehement opposition to the resumption of the live export trade to Indonesia. The suspension was lifted without proper consultation or the introduction of robust processes to guarantee animal welfare. It is also apparent from examining all of the available literature on the issue that the live export model is fundamentally flawed and its long term survival is not feasible.

Although the aim of this independent review is to “assist the Australian Government establish safeguards to ensure there is verifiable and transparent supply chain assurance up to and including the point of slaughter for every consignment that leaves Australia”, I do not believe that real safeguards can be implemented for the following reasons:

1. The objective of the proposed industry action plan (Indonesia Animal Welfare Action Plan - May 2011) is to achieve a ‘desired outcome’ to meet OIE standards by 2015. This means that:

- *Animals will continue to be butchered whilst fully conscious.*
- Of the 750 registered slaughterhouses in Indonesia, at present only 4 use stunning¹ – or 11 according to Meat and Livestock Australia.² MLA has committed to increasing this by another 5 abattoirs by November 2011, with the aim of further expanding the stunning plan by the start of next year.³

Introducing stunning in a mere 2% of facilities in 2011 is not an adequate response. Past experience has also proven that changing practices to traditional slaughter methods have not been achievable, despite the establishment of an Indonesian Animal Welfare Taskforce by MLA five years ago to address these issues. To quote from a recent report published by MLA/LiveCorp, it has been conceded that: “there are significant impediments in Indonesia to slow the movement to a more constrained slaughter practice”.⁴ Therefore, the motion to introduce widespread stunning in abattoirs across Indonesia is a grandiose and unachievable scheme.

- *Animals will continue to be subjected to the Mark 1 restraint boxes which facilitate the traditional method of roping slaughter.*
- Funded by Australian taxpayers but designed in direct contravention of OIE standards, the Mark 1 boxes “violate every humane standard all around the world” according to Professor Temple Grandin, the world’s leading slaughter expert. The violent method of forcibly tripping cattle utilising the Mark 1 restraint boxes has been shown to cause extreme distress, pain and injury to cattle and is partly responsible for the prolonged deaths widely documented in both live industry and animal welfare group reports. A recent industry report documented cattle attempting to regain their feet on an average of 3.5 times once they had been felled into the slaughter position.⁵
- The use of the Mark 1 restraint boxes is not compatible with the humane practice of stunning before slaughter, as it does not enable the animal to be restrained in a fixed, stable position.⁶

- The plan to perform upgrades through the introduction of the improved Mark 4 restraint boxes, as a gradual replacement of the Mark I restraint boxes, has been met with limited success. The Mark 4 restraint boxes require electricity to operate, which many Indonesian abattoirs do not have. The Indonesian workforce in these facilities also lacks the skills to operate this equipment manually even if adequate training is provided.⁷
- *Minimum standards on animal welfare, as established by the OIE, are only a 'desired outcome' to be reached in 2015, which is four years away.*
- The introduction of this objective exposes the lies propagated by the live export industry for the past two decades that signatories to the OIE - such as our trade partner, Indonesia - have been compliant in attaining the OIE standards. The admission that it will take Indonesia until 2015 at least, to meet the most basic international standards is testament to the substandard slaughter methods currently practised in that country. The level of deception also makes it difficult for the Australian public to trust that the live export industry is sincere in its new found commitment to animal welfare.
- The OIE animal welfare standards fall far short of the slaughter standards established for Australian abattoirs. This is a compelling reason to introduce on-shore processing of cattle and to invest in the lucrative chilled and frozen beef market. It is also an opportunity to support the Australian beef processing sector which is being undermined by the live export industry, to the point where its future viability is at stake.⁸

2. The live export trade continues to be regulated by the live export industry and its Indonesia action plan does not contain any new measures designed to instigate real change in line with a strategic vision.

- The negligence of the live export industry to establish safeguards to protect the welfare of Australian cattle over two decades, means that it can no longer be entrusted with the task of ensuring the integrity of the supply chain. The endorsement and supply of the Mark I restraint boxes, the failure to act when presented with evidence of rampant animal abuse and the long held practice of engaging experts and consultants with incestuous links to the industry are only some examples of a morally bankrupt industry which places profits over animal welfare.
- The current commitment to audit abattoirs was initially recommended in an industry report published six years ago⁹ but never implemented. If it had, the industry could never have feigned ignorance of the unacceptability of processing facilities in Indonesia.
- There is evidence that Standard Operating Practice (SOP) training has already been delivered to Indonesian abattoir workers,¹⁰ but it has failed to deliver any significant shift in understanding of the importance of animal welfare and the need to dispense with cruel handling methods. Nor has it had any impact on the efficiency of slaughter practices¹¹ with the RSPCA investigation in 2011 revealing that on average 11 cuts to the throat was meted out during slaughter.¹² The unskilled and temporary nature of the Indonesian workforce in this sector also contributes to this problem, with an industry report conceding that "due to the enormous turnover of people in the slaughter teams and their relatively low social status, it is not a good strategy to invest in training personnel in animal handling practices at this level."¹³ These findings are not a positive indicator that training is going to address this long standing and endemic problem.

3. Indonesia does not have any enforceable animal protection laws and the OIE standards are minimum standards on animal welfare and do not meet Australian slaughter standards.

- The regulatory framework of Australia guarantees the enforcement of standards established with regard to the transport and slaughter of cattle. These cease to have an effect once animals reach Indonesia. And though Indonesia is a signatory to the OIE, there are no codes or laws in place to enforce OIE guidelines - nor are there any general legislation protecting animals. In fact, MLA has conceded that “the livestock industry and MLA do not have the power to enforce animal welfare standards in any country...”, which makes it a pointless exercise to appoint 30 animal welfare officers as part of its Indonesia Animal Welfare Action Plan. To reinforce this point, it is worth noting an Indonesian Animal Welfare Taskforce was established in 2006 made up of representatives from MLA, Livecorp and APFINDO (the local feedlot association) and as the Animals Australia/RSPCA investigation exemplified, not much positive change has been instigated in the past five years.
- The OIE animal welfare standards fall far short of the slaughter standards established for Australian abattoirs. The treatment meted out in Indonesian abattoirs would give rise to prosecution under Australian animal welfare legislation.

References

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