

# **Senate Standing Committees on Rural Affairs and Transport**

## **Animal Welfare Standards in Australia's Live Export Markets**

### **Submission by Carole de Fraga**

#### ***Terms of Reference:***

- 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.<sup>1</sup>**

#### **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<sup>2</sup>**

Australia's live export trade has persisted for many years despite compelling evidence being presented on a regular basis to the Australian authorities and the bodies responsible for the trade of the serious welfare problems faced by Australian animals during the lengthy sea journeys, particularly to countries in the Middle East and North Africa and then during onward transportation and slaughter in the destination country.

Journeys to the Middle East/North Africa result in inevitable suffering and death particularly of sheep, many of whom are prone to inanition (failure to eat). Heat and humidity are also major contributors to mortality. According to DAFF sheep shipboard deaths have averaged around 1 percent over the past ten years, thus 700 sheep per 70,000 sheep. Research and development over several decades has failed to eliminate such 'routine' deaths. Although cattle deaths are fewer, shipments travelling the shorter journey to South East Asia – to where the majority of live cattle are transported - may run into heavy seas during the cyclone season. Cattle on these routes have suffered significant injury and death on board, as well as inevitable fear and distress during the storms.

In light of the suffering that is inherent in the often protracted journeys and the intractable nature of the problems of cruel handling and slaughter in the importing countries, I believe the trade should be brought to an end and replaced by trade in meat product.

These long journeys are incompatible with the widely accepted principle that animals should be slaughtered as near as possible to the farm of rearing with long distance trade being in the form of meat and carcasses. Indeed, Article 7.2.1 of the recommendations of the World Organisation for Animal Health (OIE) on the transport of animals by sea states that "The amount of time animals spend on a journey should be kept to the minimum".

For these reasons I support the Bills recently tabled in the Senate with a view to ending the live export trade:

- a) Live Animal Export Restriction and Prohibition Bill 2011
- b) The Live Animal Export (Slaughter) Prohibition Bill 2011

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<sup>1</sup> NOTE: I have not commented on question 2.

<sup>2</sup> See also 1.b)

Notably the Live Animal Export Restriction and Prohibition Bill stipulates strict regulation of live exports, including in receiving countries, to standards at least equivalent to OIE recommendations and including mandatory stunning, while live exports continue. Live exports would then cease in three years (July 2014), enabling in the meantime the development of export accredited abattoirs in areas of Australia where there are currently none or insufficient, to provide alternative means of marketing cattle particularly from the north of Australia.

### **Ongoing monitoring of the subscription to, and practise of, animal welfare standards in all live export market countries**

Reports, both written and filmed, by Animals Australia have repeatedly demonstrated that after arrival in countries in the Middle East Australian animals are subject to treatment that fails to comply with the recommendations of the World Organisation for Animal Health (OIE) on the (i) transport of animals by road and (ii) slaughter of animals for human consumption.

In its submission to the Senate Inquiry, Compassion in World Farming has listed and explained contraventions of the OIE recommendations on transport and slaughter revealed in reports by Animals Australia of their investigations to 2008 and I commend Compassion's submission, complete with Annex I and II, to you in this regard. Investigations by Animals Australia since 2008 have demonstrated that contraventions of the OIE recommendations continue to occur on a regular basis in the Middle East and most recently have shown serious breaches also in Indonesia. Breaches in relation to the slaughter of Australian cattle at particular abattoirs in Indonesia, visited by Animals Australia in March 2011, are detailed by RSPCA in an Observational Study.<sup>3</sup>

### **The need to surpass basic OIE standards by mandating stunning for exported animals**

However, the OIE recommendations provide only minimum standards and do not require animals to be stunned before slaughter. Scientific research shows that animals that are not stunned experience severe pain at throat cutting and that there is a prolonged period between throat cutting and loss of brain responsiveness during which animals can suffer extreme pain and distress. Again I commend to you detailed information submitted by Compassion in World Farming and supported by a Scientific Report<sup>4</sup> and a Scientific Opinion<sup>5</sup> by the European Food Safety Authority (EFSA) and a report of the UK Farm Animal Welfare Council critical of religious slaughter without stunning.<sup>6</sup> The EFSA Opinion states that without stunning "... the time between cutting through the major blood vessels and insensibility, as deduced from behavioural and brain response, is up to 20 seconds in sheep ... up to 2 minutes in cattle". The EFSA Report states a high risk of animals feeling extreme pain during the cutting of the throat, and that while conscious following the cut they can experience anxiety, pain, distress and other suffering.

On the basis of widely accepted scientific evidence, Australia should insist on animals being stunned before slaughter overseas. Animals killed in Australia for overseas Muslim markets are in the majority of

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<sup>3</sup> Dr Bidda Jones, *The Slaughter of Australian Cattle in Indonesia: an Observational Study*, RSPCA Australia 2011, Table 8 p.25.

<sup>4</sup> Report of the Scientific Panel on Animal Health and Welfare on a request from the Commission related to welfare aspects of animal stunning and killing methods. European Food Safety Authority-AHAW/04-027.

<sup>5</sup> Opinion of the Scientific Panel on Animal Health and Welfare on a request from the Commission related to welfare aspects of the main systems of stunning and killing the main commercial species of animals. *The EFSA Journal* (2004), 45, 1-29.

<sup>6</sup> Farm Animal Welfare Council, UK. Report on the welfare of farmed animals at slaughter or killing. Part 1: Red meat animals. June 2003.

cases pre-stunned, indicating acceptance of pre-stunning by Muslims abroad. Australia should insist that Australian animals abroad are killed to the same general standards as in Australia and thus pre-stunned.

Beyond the scope of this Review, but nevertheless related is the need for Australia to remove exemptions for slaughter without stunning of animals killed in Australia. Apart from sparing pain and distress to animals in Australia, it will strengthen claims to our requirement for pre-stunning abroad.

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

### **Concerns include:**

- a) Belief that the Australian live export industry has expanded over several decades without sufficient estimate of welfare problems beforehand or preparation to enable livestock to enter overseas markets with welfare safeguards at all stages of the export process, i.e. from discharge to slaughter and involving premises, transportation, effective training and equipment. Expansion has been the priority, not animal welfare before the commencement of live animal export to a particular destination. I would welcome further investigation into this aspect of the trade.
- b) MLA/LiveCorp has long known of welfare shortcomings and animal abuse in direct relation to animals that have been exported to overseas markets over a number of years, but did not accurately report the severity of many of these abuses; thus they have continued;
- c) Measures taken to abate the severity of cruelties were either ineffective or ineffective in the longer term;
- d) Reporting mechanisms including that of accredited veterinarians may involve conflicts of interest.

Although the Federal Department of Agriculture, Fisheries and Forestry (DAFF) is responsible for Australia's agricultural sector at a national level including the regulation of livestock exports *via* the Australian Quarantine Inspection Service (AQIS), once shipments have left Australia monitoring and reporting of all stages of the export process, including welfare at slaughter, is in the hands of industry, although accredited veterinarians who accompany consignments during the sea journey must report to AQIS. This system removes objectivity and provides Industry with an incentive not to highlight negative events.

In particular relation to the reporting by accredited veterinarians to AQIS, I am concerned that the system involves conflict of interest and may also involve subsequent distortion of results, as reported in the media on 13 July 2011.<sup>7</sup> I believe the reporting system – at all levels – needs to be re-evaluated.

The resumption of trade to Indonesia following suspension of the trade from June 7 to July 6 2011 provided an opportunity to redress the inherent problems and concerns of self-regulation but essentially the system remains unchanged with Industry responsible for required auditing of the supply chain.

Reports of cruelty to Australian sheep and cattle in receiving countries have come to public notice as a result of investigations by animal protection organisations, notably Animals Australia sometimes in conjunction with others (Compassion in World Farming, PETA), which are detailed and accessible *via* the Animals Australia website ([www.animalsaustralia.org](http://www.animalsaustralia.org)).

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<sup>7</sup> <http://www.theaustralian.com.au/national-affairs/vet-worried-about-dodgy-inspections-of-live-exports/story-fn59niix-1226093400993>

## Middle East/North Africa

As a result of revelations by animal protection organisations some action has been taken by the Australian Government and/or Industry to avoid the obvious cruelty. However, actions do not generally appear to have led to any real improvements and changes that do occur are often not long-lasting. Examples:

- a) Investigation in Kuwait in 2003 identified brutal behaviour towards sheep by staff in Shuwaikh municipal slaughterhouse. This evidence was revealed by 60Minutes in March 2004. Meat and Livestock Australia (MLA) immediately announced a 4-day animal-handling workshop in Kuwait; MLA's Annual Report 2003-2004 announced that it had developed an 'animal handling education package' for the Middle East.<sup>8</sup> Yet when Animals Australia returned to Kuwait in 2006 neither conditions for the animals nor the behaviour of abattoir staff had changed.<sup>9</sup>
- b) In December 2007 Animals Australia visited Bahrain. MLA has a Middle East base in Bahrain, has conducted training courses and the Australian Veterinary Counsel is based in Dubai. Yet animals were filmed with legs trussed, being dragged across streets, stuffed and thrown into cars/boots, tossed over railings into the back of trucks and cruelly slaughtered in abattoirs and on streets while fully conscious.<sup>10</sup>
- c) Footage obtained by Animals Australia in Bahrain in 2007 forced the Bahraini Government to react and prohibit the carrying of Australian animals in car boots from the Bahrain feedlot. MLA/LiveCorp subsequently lauded the success of their 'in the Ute, not the boot' initiative.<sup>11</sup> Animals Australia subsequently found sheep being transported in small trucks from the feedlot to markets where purchasers then stuffed the animals into car boots.
- d) Following investigation in Egypt in Jan 2006, cattle exports were suspended in February 2006 and only resumed in May 2009 following construction of "a state-of-the-art feedlot and abattoir and iron-clad assurances" that animals would be well-treated.<sup>12</sup> According to MLA, trade suspension was due to "documented evidence of atrocious handling conditions". It was Animals Australia's documentation of its own hard-won evidence that brought about the suspension. Industry - who one must assume would have had the opportunity to identify similar evidence – had neither made it known nor taken effective action.
- e) Sheep exports to Egypt have not resumed following documented evidence by Animals Australia of cruel treatment of Australian sheep during the Festival of Sacrifice in Dec 2006. Evidence of cruelty in and surrounding open markets was easily obtained. Industry must have been aware of this for many years but chose to ignore it.

## Indonesia

Most recently cattle exports to Indonesia were suspended for a month following revelations by Animals Australia of extremely cruel slaughter methods. Industry claimed, variously, not to have known of the cruelty, or not to have known its extent. Implicated in the cruelty were Mark I restraint boxes commissioned and installed by MLA.

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<sup>8</sup> [www.mla.com.au/files/88510c2e-2f0f.../MLA-Annual-Report200304.pdf](http://www.mla.com.au/files/88510c2e-2f0f.../MLA-Annual-Report200304.pdf)

<sup>9</sup> <http://www.animalsaustralia.org/investigations/live-export-investigation-2010.php>

<sup>10</sup> <http://www.liveexport-indefensible.com/investigations/middleeast-Dec07.php>

<sup>11</sup> <http://www.animalsaustralia.org/investigations/live-export-investigation-2010.php>

<sup>12</sup> Asa Wahlquist, Export of live cattle to Egypt back on, *The Australian* 9 May 2008.

Contrary to claims of ignorance MLA's Annual Report 2005-2006 states that 69 abattoirs in Indonesia slaughtered Australian cattle; 38 of them were visited, reported upon and recommendations were made. Six restraining boxes were installed and a DVD in the Indonesian language produced showing how to use the box and gain benefits.<sup>13</sup>

The Live Trade Animal Welfare Partnership (LTAWP) initiative between government and the live export industry, designed to provide funding for projects in the Middle East and South East Asia to improve animal welfare and support trade in these markets, was announced in the 2009-2010 budget (a Aus\$3.2million partnership, Aus\$1.6million provided by Government over three years).<sup>14</sup>

Projects supported to date have focused on enabling better animal welfare outcomes in the handling, transport and processing of live animals. DAFF lists improved abattoir infrastructure and training of abattoir workers in animal handling as the primary animal welfare improvements in Indonesia. The use of restraining boxes provided "a significant improvement on traditional slaughter", the use of "smaller ropes" and "less pressure" eased stress for animals.<sup>15</sup> The ongoing difficulty of slaughtering the larger Australian animals is clearly acknowledged, yet the trade continued.

In May 2010 MLA/LiveCorp published a Final Report of the 2009/10 Live Trade Animal Welfare Partnership on Indonesian point of slaughter improvements.<sup>16</sup> This report states that activities will include assessment to identify facilities and recommend achievable improvements required to assist facilities to meet OIE standards.

Thus it was known that facilities slaughtering Australian cattle did not meet OIE standards. Although regrettably MLA/LiveCorp apparently were not familiar with all the facilities slaughtering Australian animals, it is inconceivable that they were not aware of the major animal welfare problems identified in March this year by Animals Australia.

Incorporated into the LTAWP report are the results of an independent review by a panel of experts.<sup>17</sup> The panel identified slaughter as posing the greatest welfare threat to cattle. It is hard to correlate the cruelty revealed on a subsequent visit by Animals Australia with the panel's conclusion that "animal welfare was generally noted to be good. Surprisingly, given Professor Grandin's assessment of the Mark I Box, the panel considered that the box had brought "obvious welfare improvements". The improvements the expert panel recommend indicate they had observed the distress caused to animals brought down in this way, but were satisfied the system should continue.

The LTAWP report clearly indicates that major problems of slaughter techniques were known to MLA/LiveCorp. Details in the report, from 11 abattoirs visited [by the expert panel] show the majority of animals observed during slaughter (29 cattle) were subjected to significant levels of pain, fear and distress during handling and an inhumane slaughter. 17% of animals regained their feet after the fall, and on average lifted their head (head slaps) 3.5 times. The report states that "the average number of cuts was

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<sup>13</sup> Accessible via [www.mla.com.au/](http://www.mla.com.au/)

<sup>14</sup> Live Trade Animal Welfare Partnership <http://www.daff.gov.au/market-access-trade/iac/live-animal-trade>

<sup>15</sup> *Ibid* Yet the Mark I box was condemned by Professor Temple Grandin as "violating every humane standard there is all around the world", <http://www.abc.net.au/4corners/content/2011/s3230934.htm>

<sup>16</sup> Live Trade Animal Welfare Partnership 2009/10 Final Report - Public Release: Indonesian point of slaughter improvements. MLA LiveCorp. [http://www.daff.gov.au/\\_data/assets/pdf\\_file/0005/1886477/indonesia.pdf](http://www.daff.gov.au/_data/assets/pdf_file/0005/1886477/indonesia.pdf)

<sup>17</sup> *Ibid* Appendix 1 Final Report: Independent study into animal welfare conditions for cattle in Indonesia from point of arrival from Australia to slaughter, prepared for MLA and LiveCorp, May 2010

four”, with up to 18 cuts applied on one occasion. The panel also noted “significant animal welfare issues” when animals fell severely from the restraining box and head slapping occurred.<sup>18</sup>

***In conclusion***, the monitoring and reporting of export consignments of feeder or slaughter livestock up to and including the point of slaughter, on the evidence preceding, is woefully inadequate with disastrous animal welfare consequences. Despite the presence of Industry staff and Australian government representatives in receiving countries, poor welfare standards to the point of extreme cruelty have continued with no effective programme for an acceptable level of improvement. Trade expansion and economic benefit have been the overriding goals of Australia’s live export trade. Had it not been for investigations by animal protection organisations this situation would have continued, unchanged.

## **Other related matters**

### **Government decision to permit resumption of live cattle trade to Indonesia**

The sudden lifting of the ban on the export of live cattle to Indonesia leaves critical questions regarding the welfare of animals unanswered. The Australian public, so outraged by cruelty to cattle at slaughter revealed in Indonesia, must be fully reassured as to the welfare of animals that now travel to Indonesia. Unless these questions are satisfactorily answered and the system amended appropriately, history will repeat itself. Public outrage will continue and Australia’s global reputation will continue to suffer. However, most importantly, animals will continue to suffer in a flawed and veiled system. Further information is required:

- As no Australian veterinarians or officials have apparently been permitted to enter Indonesian slaughterhouses, for assessment, since imposition of the ban in early June concern remains as to what – if any - improvements have been made in the interim.
- The Order lifting the ban only requires the transport, handling and slaughter of Australian cattle to be in accordance with OIE recommendations, which are designed to lift the most rudimentary of handling and slaughter in developing countries to a minimum standard and are totally inadequate in the Indonesian situation, where assistance is received from Australian Government and Industry. Standards in Indonesia should go beyond OIE recommendations, to include, most importantly pre-stunning in an upright restraint.
- Neither the Order lifting the ban nor subsequent remarks by the Minister have mentioned the Mark 1 restraint box, condemned widely for causing or permitting extreme cruelty to cattle. The Australian public must know the Government’s directions regarding use of this box.
- Again, the welfare precautions for the trade rest with Industry, which repeatedly has been shown to have failed the Australian public in meeting expectations of humane treatment of animals exported overseas. Most recent and shocking are the revelations, in Indonesia, that industry was aware of gross mistreatment and cruelty to cattle at slaughter, but let it continue. The Australian public has been told that regular audits are to occur but not who will maintain oversight in Indonesian slaughterhouses to ensure that cattle receive humane treatment and that cruelty does not occur in-between audits.

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<sup>18</sup> *Ibid* p.31 of Appendix 1

- Neither do we know to whom Auditors will report nor the repercussions for those found to have transgressed welfare requirements. If Auditors are to report to Industry I have no faith that cruel treatment will be properly dealt with. The Government's press statement indicates that audit reports will be made public but we do not know to whom, and by what means. We should also know the frequency of audits.

Pending satisfactory answers to these queries exports to Indonesia should not have recommenced. Information must be provided to the Australian public immediately.

Thank you for the opportunity to submit comment to the Senate Inquiry into animal welfare standards in Australia's live-export markets. Should clarification or further information be required I shall be pleased to respond.

**Carole de Fraga**

15 July 2011