Animal welfare standards in Australia's live export markets

Background of submitting person:

I am an Australian veterinarian who graduated in 1984 and am a long-term member of the Australian Veterinary Association. I have followed the live export trade actively since 1989 when I visited a live sheep transport boat with a veterinary colleague. I prepared this submission to the Senate Committee Inquiry on Animal Welfare Standards in Australia's Live Export Markets in conjunction with another veterinary colleague, Dr Susan Foster.

Background relevant to current enquiry

A Senate Enquiry in 1985[1] concluded that there was sufficient evidence on welfare grounds to stop the live sheep export trade immediately. The report stated that "the trade is, in many respects, inimical to good animal welfare and it is not in the interests of the animal to be transported".[1] Due to economic and practical reasons it was recommended that the live export trade be phased out over a few years. The findings were ignored and the trade was expanded to include export of live cattle. The Australian Government did not respond to the Senate Enquiry recommendations, both at the time or subsequently.

Examining 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, including:
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;
i) expenditure and efforts on marketing and promoting live export to Australian producers;

Comment: not in a position to make informed comment

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

Comment:

With respect to the Australian Government, the failure to follow the recommendations of the 1985 Senate Enquiry of 1985,[1] suggests that monitoring animal welfare issues is of minimal importance or interest. The fact that so many valid complaints made to various relevant ministers over the years have been consistently ignored highlights the reluctance of the government to interfere with rural industry even when faced with legitimate reports of poor animal welfare and animal abuse (Appendix 1). The Australian Government has been unwilling to act on informed advice that prioritises animal welfare over industry profits.

With respect to MLA and LiveCorp, only they can accurately answer this question as such information is not necessarily available to the public. A comprehensive report exposing most of the Indonesian cattle slaughter issues observed by Australian viewers on Four Corners was made available to the public in May 2010.[2] The commissioning of an independent evaluation would indicate that some monitoring does occur but it would appear that there has been limited or no response to that monitoring. In essence, this report[2] describes critical issues of transport, feedlotting and slaughter practices. The written description of slaughter practices matches that shown on the Four Corners report (including range and average of number of head slaps and range and average number of incisions required for slaughter). The report indicates that the industry was well aware of the animal abuses that were occurring in Indonesia.

Similarly, MLA and LiveCorp failed to respond appropriately to their own monitoring and external reports on the situation in Egypt between 2000 and 2006 (see Appendix 1). The consistent failure of MLA and LiveCorp to address the issues in Egypt led to media exposure in Australia that resulted in the Federal Government banning the live cattle trade to Egypt in 2006. When trade resumed in 2010, the first shipment on the Wellard's flagship vessel, Ocean Shearer, provoked an AQIS investigation into the deaths of 295 cattle on board. The investigation exposed inexcusable mishandling and neglect. At the time, it was noted that this was

not an isolated incident. The RSPCA made the following public comment: "As such, it would appear **that if monitoring is appropriate, and it may be, that it is purely a public relations exercise and has minimal impact on practices within the live export trade**" (RSPCA comment 2010).[3] That comment would still appear to still be valid with respect to response to monitoring by MLA and LiveCorp.

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

Comments:

Again, documentation from the relevant companies would be required to analyse whether any actions had been taken to improve animal welfare outcomes in Australia's live export market. What can be said, based on the MLA/LiveCorp 2010 report,[2] is that any actions that had been taken were obviously ineffective or insufficient. Slaughter practices as judged from the media footage in 2011 and the MLA/LiveCorp report in 2010 indicate that practices remain unchanged. Shipping atrocities such as that occurred on Ocean Shearer also demonstrate that actions taken from any monitoring of shipping practices over 20 (or more) years have also been insufficient or non-existent.

With respect to actions taken to improve animal welfare outcomes, MLA has tried to implement improved practices at slaughter by researching and developing a number of different slaughter boxes (Marks 1-4). The RSPCA has a detailed document titled "Mark 1 Boxes Are they Acceptable?" which describes why these restraint boxes are inhumane.[4] The report provides a direct quotation from an international expert Dr Temple Grandin (Professor of Animal Science, Colarado State University): "The handling of cattle in the Mark 1 restraint box is atrocious. A system that is designed to make an animal fall should never be used... I was shocked to see the Australian Meat and Livestock name on the side of this dreadful contraption". The letter from Dr Susan Foster to Minister Ludwig regarding the use of these boxes is also included (Appendix 2). Development of these boxes has undoubtedly improved slaughter practices but the fact that the improvement seems to only have been from "atrocious" to "terribly poor" is a sad indictment on MLA, their spending of research money and their lack of true understanding of animal welfare. If Australian and US standards demand upright slaughter then it belies understanding why a company would invest so much money in developing and implementing this form of restraint for Australian cattle in overseas abattoirs.

b) The extent of knowledge of animal welfare practices in Australia's live export markets including:
i) formal and informal monitoring and reporting structures;
ii) formal and informal processes for reporting and addressing poor animal welfare practices.

Comments:

1b i) It would appear from the MLA/Live Corp report of 2010 that some formal monitoring has been undertaken in Indonesia at least. However, that report highlights the fact that for many aspects of the trade, records and reports within the importing country were usually not kept or available for scrutiny e.g. accurate numbers of pregnant heifers in feedlotting (p20) or mortality rate in feedlotting (p19).[2] The report also highlighted numerous aspects that the observers were unable to directly assess (e.g. the provision of food and water to cattle left unloaded in trucks for up to three days (p12)).[2] It is doubtful that MLA/Live Corp followed up on these issues and checked themselves.

1b ii) With respect to the live cattle and sheep trade, it would appear that both MLA and LiveCorp have consistently failed to address animal welfare issues reported to them by their external consultants and by independent observers. The fact that a report on the live cattle trade in Indonesia highlighted so many issues of animal welfare issues in 2010 and that no satisfactory action was taken to resolve these issues within a 12-month time frame indicates an inappropriate response and/or response time to these reported issues. A background statement on the previous situation in Egypt (Appendix 1) demonstrates that this seems to be a recurring problem with MLA and LiveCorp.

It is also an uncomfortable reflection on the Australian Government generally, that federal intervention has only occurred when issues, that had been repeatedly reported to them informally, have been finally exposed in graphic detail to the Australian public by television footage. This would suggest a clear failure of government policy and concern in addressing poor animal welfare practices. The Australian Government has consistently relied upon industry, MLA and LiveCorp assurances and placed more faith in their collective assurances than

in the informal reports of concerned observers including trained veterinarians and members of respected welfare organisations such as RSPCA.

2. Investigate and report on the domestic economic impact of the live export trade within Australia including:
   a) Impact on regional and remote employment especially in northern Australia;
   b) Impact and role of the industry on local livestock production and prices;
   c) Impact on the processing of live stock within Australia.

Comment:

I am not in a position to provide detailed informed comment and analysis of this issue. The very general economic comments that can be made are as follows.

This trade is never guaranteed. It is a high-risk industry. With respect to Indonesia, a permit is provided on a 3 monthly basis. There is no certainty or stability for farmers or their animals. Indonesia is becoming more self-sufficient and it is unlikely that they will keep relying on imported cattle. It is also not in their best interest to do so. This trade could be halted abruptly and arbitrarily at any time by Indonesia (or other importing countries) and Australian farmers have no "fall-back position". Northern Australia has limited or no ability (depending on location) to process cattle if this industry is halted and there is no financial incentive for setting up processing facilities whilst the high profit, live export trade exists. As such, it is an extremely risky economic venture. Like most high risk ventures, if it fails, business fails. In the case of Australian farmers, it is not just a loss of business, it is loss of home, income, way of life and total livelihood. In addition, Australian animals may also be adversely affected, for example, if there is no money to buy diesel to pump water through a dry season or if farmers have no option but to abandon their farms and animals on those farms if they are forced to just "walk-away". This trade forces a risk that really has no parallel in the wider business community.

If this trade were to be phased out, jobs in northern Australia could be created with the development of processing facilities in northern Australia. Domestic processing creates jobs and "value-adds" to any exported meat. Profits to the producer may be lower but the risks entailed would be considerably decreased and be more in line with the risks farmers are required to take every day and every year: weather, market prices, Australian dollar, etc.

3. Other related matters.

i) Exported Australian livestock are not protected to the same standard as set and maintained within this country. World Organisation for Animal Health (OIE) recommendations and standards are well below Australian standards. They do not require upright pre-slaughter stunning and they do not exclude roping restraint, tripping and casting of animals as occurs in most Indonesian abattoirs. Presumably, they do not also forbid the distressing "cultural" practice of hosing water or throwing buckets of water on helpless, cast animals as occurs in Indonesia.[2] It should not be acceptable in Australia that our Australian animals are only, at best, protected by an animal welfare code with base-level standards. Whilst technically difficult to institute and maintain in importing countries, upright, pre-slaughter stunning must be made mandatory for Australian animals if this trade is to continue. This practice apparently is appropriate for Halal slaughter so there is no cultural reason to prevent it becoming a mandatory standard.[2]

ii) Australian regulatory arrangements are inadequate to protect exported Australian livestock. Once an Australian animal has left Australia, they have no protection against inappropriate stress let alone outright cruelty. Importing countries do not have basic animal welfare legislation so no amount of Australian regulatory arrangements can protect animals exported from Australia. Mishandling, mistreatment, inadequate housing, poor transport facilities and cruelty are a natural consequence of our inability to regulate animal welfare in the importing countries.

iii) In my opinion, no live animals should be exported from Australia as feeder or slaughter animals. Exporting animals live, under any circumstances, even with best-practice ships (and over the years, many have been shown to be sub-standard) directly compromises animal welfare. Around one thousand cattle and 40,000 sheep die at sea every year while being exported for slaughter. When there is also loading, unloading, transport to feedlots, feedlotting itself (sometimes with poor conditions and, consistently in Indonesia, with inadequate roughage of a desirable length to decrease the risk of lactic acidosis)[2], transporting to and from

feedlots (which could be up to 3 days with no unloading in Indonesia according to MLA/LiveCorp's own report[2]) then slaughter, there are so many opportunities for poor animal welfare and unacceptable suffering that this trade cannot be condoned at any level.

It is simply impossible (as outlined in numerous places in the MLA/LiveCorp report 2010)[2] to ensure that skilled animal handlers are involved or the animal risks involved in transport, feedlotting and slaughter in an importing country are minimised. Every step, as outlined in the MLA/LiveCorp report is problematic and none can be regulated as often independent, non specialist/non-trained operators are involved.[2] A similar observation was made by a specialist slaughter consultant reporting on the situation in Egypt (Appendix 1).

Stress is cumulative. From the moment Australian livestock are loaded onto a truck at a farm, there is stress. If this is minimised with short transportation and Australian slaughter then it is acceptable. It is not acceptable to keep adding stress: boat trip, feedlotting, internal transport in non-specialist vehicle (usually with no non-slip floors and no facilities for unloading if transport is prolonged or halted), adverse slaughter conditions, etc.

Conclusions

As far as a veterinarian member of the public can judge, the efforts made by the Australian Government, MLA and LiveCorp to improve animal welfare have been either inadequate or ineffective. It is difficult to know whether adequate money has been spent on monitoring or whether money that has been spent on monitoring has been wasted due to inappropriate or no action. That the Egyptian trade was banned and then an almost identical situation occurred in Indonesia suggests that this problem is not taken with due seriousness by MLA and LiveCorp and that their responses to independent reports have been consistently inadequate over a 10 year period.

However, no amount of industry money could ever address the issues exposed in the 2010 Indonesian report prepared for MLA and LiveCorp[2] or any subsequent independent reports of the live export trade. **The trade itself is incompatible with good animal welfare**. This means even if MLA and LiveCorp had the best intentions and an unlimited budget, they would have little ability to effect enough change to prevent animal suffering and cruelty in the live export trade. The fact that they have never acknowledged this and that they have consistently maintained that animal welfare was acceptable, despite evidence to the contrary, makes them guilty of misleading interested parties be they general public, farmers or government. Few, if any Australian farmers would have let their animals be exported had they been truly aware of the suffering that they would and could endure.

This trade is not acceptable at any level based on welfare grounds. It is also not acceptable on economic grounds. As such, and in line with the 1985 live export enquiry,[1] it needs to be replaced with a refrigerated meat trade and local processing. The live export trade should be phased out so that there is time to allow this infrastructure to be instituted. Whilst it is being phased out, strict regulations with independent Australian government monitoring, especially at the point of slaughter, need to be in place to minimise animal cruelty and stress as much is as possible.

Dr Linda Fleeman BVSc PhD MACVSc

References

1. Export of live sheep from Australia. Report by the Senate Select Committee on Animal Welfare. The Parliament of the Commonwealth of Australia. 1985

2. Final Report. Independent study into animal welfare conditions for cattle in Indonesia from point of arrival from Australia to slaughter. For public release. Prepared for Meat & Livestock Australia and Live Corp. May 2010

3. http://rspcawa.asn.au/~rspcawa.asn.au/index.php?option=com_content&view=article&id=1374:egypt-cattle-deaths-report-damning-rspca&catid=3:newsflash&Itemid=615

4. Mark 1 boxes – are they acceptable? RSPCA 2011
http://www.rspca.org.au/assets/files/Campaigns/Mark1-restraint-boxes.pdf

Appendix 1: Background document for Media: Why Animals Australia was forced to undertake this investigation and provide evidence to the Australian community. **A history of concerns and failed/flawed responses.**

http://www.animalsaustralia.org/media/press_releases.php?release=54

Since 1995 over 1 million Australian cattle and hundreds of thousands of sheep have travelled on livestock vessels 10,000 kms by sea to Egypt to be slaughtered. Animals Australia has repeatedly brought concerns regarding the treatment of animals in Cairo's major abattoir – Bassatin to the attention of the Federal government and live export industry. On each occasion, action was taken only when issues at Bassatin have been publicly exposed in the media, or the threat of exposure existed.

Egypt has no animal welfare laws. The treatment of cattle at Bassatin has been brought to the attention of the Egyptian Government and the Government Veterinary Service on a number of occasions. The majority of Australian cattle are slaughtered at Bassatin abattoir.

The current investigation shows that the treatment of animals at the abattoir has not altered.

History:

October 2001
Animals Australia is alerted by eye-witness Veterinarian Dr Petra Sidhom to the horrendous slaughter practices in this abattoir included the slashing of rear leg tendons and stabbing of eyes to disable and disorientate cattle prior to slaughter whilst fully conscious. Executive Director Glenys Oogjes immediately brings this to the attention of the National Consultative Committee for Animal Welfare (NCCAW) which advises the Federal Minister for Agriculture.

Present at this meeting was then **LiveCorp CEO Kevin Shiell who admitted that he was aware of these practices in Egypt.** At this stage Australia had been exporting cattle to Egypt for 6 years yet it was only when Animals Australia became aware of these practices that there was any attempt to have them addressed.

2002
The live export industry responds by installing a 'restraint box' in Bassatin abattoir.

February 2003
Slaughterhouse **specialist consultant** Mr. Graeme Johnson is engaged by LiveCorp to assess Bassatin. He did not see the facility in full operation. Johnsons's subsequent report concluded: 'As independent butchers undertake all slaughter work, it is **extremely difficult to enforce acceptable standards**, and until further considerations can be evaluated, there exists no easy resolution to this dilemma.'

May 2003
Dr. Sidhom is advised by Egypt's Chief Veterinary Officer that the restraint box was not being used.

June 2003
An article by Dr. Sidhom outlining the problems and practices at Bassatin abattoir was published in the Australian Veterinary Journal. At the same time, current affairs program '60 Minutes' interviews industry officials in regards to Bassatin for a program to go to air in July.

July 2003
Industry/government reaction. One week before '60 Minutes' is to go to air exposing cruel practices in Egypt and Israel, the Federal government and live export industry announce that they will commit $150,000 to a project aimed at improving animal handling in the Middle East and North Africa. LiveCorp CEO Kevin Shiell is interviewed on 60 Minutes. He admits that he was aware that these practices had occurred but stated that LiveCorp have instigated programs in the abattoir including installing a restraint box and that he would be very surprised if these practices were continuing. Dr Sidhom is also interviewed and states that practices are still occurring.

December 2003
Industry reaction to '60 Minutes'. LiveCorp announces in a press release that improvements were planned in Bassatin and that a new restraint box is to be installed.

2004
No Australian cattle are exported to Egypt due to the low value of the Egyptian pound.

March 2004
LiveCorp/MLA's representative in the Middle East, Dr Nigel Brown states in Victoria's Weekly Times newspaper that 'Bassatin abattoir in Cairo, which had recently been modernised with help from Australian consultants, would be used as a benchmark for improvements throughout the Middle East.' LiveCorp/MLA media release – "MLA and LiveCorp recently conducted a similar workshop on best-practise cattle handling techniques in Cairo and this was very successful.'

March 2004
Dr. Sidhom visits Bassatin and provides the first independent report regarding the operation of the new restraint box. It is not being used; only a single individual knows how to operate it, there are problems with the power supply and the hydraulics were not operating when power was restored. Ascertains that Australian industry funding paid for the re-flooring (tiling) of one slaughter hall at Bassatin, whilst money pledged by the Egyptian Government was used to paint the walls of another slaughter hall and to retarmac the internal roads in Bassatin.

May 2004
An article appears in *The Age* newspaper revealing Dr Sidhom's information and observations. MLA/LiveCorp's Dr Brown flies to Australia to speak at the Australian Veterinary Association Conference (which is due to vote on a proposal that they have a policy against live exports). Brown has visited Egypt after Sidhom's visit and shows the conference a photograph of a newly installed electrical generator above the restraint box in Bassatin abattoir. The motion before the AVA is defeated.

April/May 2004
Minister Truss responding to the outcomes of the Keniry Inquiry (established after the 2003 Cormo Express rejection) announces that the Federal Government will provide 4 million dollars over four years to help improve animal welfare practices in importing countries and upgrade handling procedures. Animals Australia proposes to Minister Truss a detailed strategy for the use of the $4 million – assessment of overseas facilities and identifying priorities, independent and expert assessment of progress, involvement of welfare experts etc. The proposal is rejected by the Minister.

July 2005
Animals Australia is informed that cattle exports to Egypt have resumed and writes to the new Federal Agriculture Minister, Mr. McGauran expressing concerns and asking him to seek independent verification that practices in Bassatin abattoir have improved. Animals Australia informs the Minister that a senior representative of Compassion in World Farming visited the abattoir in October 2004 and documented man-handling of animals and the restraint box not being used.

The following is an extract from Minister McGauran's response of 9th August 2005:

''The Australian Government and the Australian livestock exporting industry have provided funding and technical assistance in recent years to upgrade facilities and procedures at Bassatin to achieve better welfare outcomes for all livestock processed there, not just livestock form Australia. The fact that the volume of the live export trade with Egypt has greatly reduced in the past two years does not detract from the fact that Bassatin is a good example where Australia's involvement in the live trade has allowed us to influence change and improve animal welfare conditions in the Middle East.''

The Investigation:
As a result, Animals Australia had no choice but to undertake to access this abattoir and document current practices to ascertain whether Minister McGauran's claims were accurate or whether Australian cattle exported to Egypt were still at risk of being brutalized. At the same time Animals Australia was alerted by Egyptian colleagues that 26,000 Australian sheep would go on the market in Cairo in January. There were grave concerns as to how these animals would be handled, transported and slaughtered.

January 2006
Animals Australia's Communication Director Lyn White travels to Cairo and, with an experienced investigator from the UK, is assisted to access Bassatin abattoir by local Egyptians. Over a 90 minute period, investigators access all cattle and sheep slaughter halls and covertly film the handling and slaughter of animals, including animals identified to investigators as Australian cattle.

Video evidence was obtained of extreme and endemic abuse of animals including the slashing of leg tendons, stabbing of eyes, and aggressive poking of eyes – to disable and disorientate cattle prior to slaughter. Further animals were having their tails cut immediately after throats were cut (whilst fully conscious) causing further suffering.

Investigators access Slaughterhall 3 which houses the Australian-installed restraint box and observe that it is not being used. Cattle are led past the restraint box to the other end of the facility where leg tendons were slashed and the animals brutally slaughtered.

Whilst in Bassatin the investigators also documented the method of slaughter of sheep, which incorporated dragging and manhandling the animals before throats were cut without pre-stunning. Whilst local animals were being processed at the time, Australian sheep are also killed in this slaughter hall.

Further, investigators documented the purchase of Australian sheep in market places and associated treatment. Animals were trussed before being put in boots of cars for 'home' slaughter. Australian sheep were also being brutally killed in illegal slaughterhouses in the centre of Cairo.

February 2006
It is decided that to provide further information to Minister McGauran is futile as he has clearly been **misled by the live export industry.** A decision is made to provide material directly to the Prime Minister calling for a ban on the export of animals to the Middle East. The material is also provided to the 60 Minutes program to ensure that the Australian community is accurately informed rather than being further misled by government and industry claims.

Compiled by Animals Australia - February 2006

Note: Recent industry claims that conditions on ships has also improved are not supported by the figures (provided by AMSA). Despite 2005 being the first year of the full operation of the new 'Australian Standards for the Export of Livestock', the on-board ship death rates for cattle and sheep were higher than in 2004.
· Cattle (reported) on-board mortality rose from 0.12% in 2004 to 0.14% in 2005 – 769 cattle died.
· Sheep (reported) on-board mortality rose from 0.77% in 2004 to 0.97% in 2005 – 35,000 sheep died (up from 24,000 in 2004).

Appendix 2: Letter regarding Mark 1 restraint boxes

4 Noel St

Hilton

WA 6163

Senator Joe Ludwig

Minister for Agriculture, Fisheries and Forestry

Parliament House

Canberra ACT 2600

22nd June 2011

cc: Alastair Lawrie, Phillip Glyde, Melissa Parke, RSPCA Australia

Dear Senator Ludwig

I am writing to provide my opinion, **as a veterinarian (**servicing the cattle industry both in Australia and overseas for 7 years**)** and **a member of the Australian Veterinary Association** (for 24 years), of the unacceptability of the Mark 1 box as a means of restraining cattle for slaughter.

I was shocked to see that the Mark 1 Box has been supported by the cattle industry and deemed acceptable. The pain and distress associated with casting animals onto a sloping concrete slab, usually with metal drains/bars for bleeding, means that this method of restraint will inherently result in excessive discomfort, pain and in some cases, physical injury. The difficulties in moving animals into the restraint box, and the time taken to rope the legs, cast and slaughter each animal means that they are each restrained for several minutes, compared to a few seconds when animals are held in upright restraint systems. Thus animals restrained in Mark 1 boxes are exposed to quite unnecessary and prolonged suffering.

Restraining animals on their sides for slaughter has been deemed unacceptable by all State and Territory governments yet, apparently, it is sanctioned by Australian authorities and corporations in Indonesia and other countries. The Indonesians have understandably come under scrutiny for their actions but it is my understanding, that scrutiny of the Australian-approved Mark 1 boxes seems to have been neglected.

The only acceptable and humane way to slaughter cattle is in an upright position and where the animal is made insensible to pain through stunning prior to slaughter. I urge you to ensure that no further time or money is wasted by your department in determining whether the Mark 1 box is acceptable. It is an inhumane device that should never be used for the slaughter of cattle.

Yours sincerely,

Dr Sue Foster BVSc MVetClinStud FACVSc

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