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&  
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**Hon. Members of the Senate  
Federal Parliament  
Australia  
Canberra ACT 2600**

**Re: Submission to Senate Inquiry due 15<sup>th</sup> June 2011**

12<sup>th</sup> June 2011

Dear Senators

In **1909**, when sheep cost 12/-, C.E.W. Bean wrote in the Sydney Morning Herald that "No one makes a friend of a sheep, any more than he would a sixpence. They are countered over like so many bank notes. That is all". One hundred and eleven years have passed and the same attitude prevails in the live export trade. Cattle, sheep and goats are still thought of as mere commodities in the live export trade, thrown together like inert grains of wheat.

In **1974**, New Zealand stopped exporting live sheep to the Middle East despite the threat of a complete veto of all meat. New Zealand ended up with a bigger market in frozen meat than Australia.

In June **1980**, the MV "Khalij Express" sailed from Adelaide to the Middle East (Voyage 24 North). 13.4% of the sheep died during the voyage. The Head Stockman wrote in a letter to the Agent "*During the loading the cargo reflected an exceptional quality of sheep. By the end of the long haul **2,713** sheep had died out of the **20, 133** loaded. The majority of the loss, **2,275**, occurred within the first 10 days of the voyage following the outbreak of a very virulent disease on the second day. Corpses rapidly distended with gas in the stomach and bowel regions and possessed often bloody or frothy nasal discharges*". An extract from a letter the Onboard Veterinarian sent to the Agent states "*I am a little mystified why, as the animals did not show any signs in the feedlot, in fact were all remarkably healthy. Usually when an outbreak occurs early in a voyage, it can be traced back to the feedlot, and no doubt the little stress that occurred with weather, feedlotting and transportation to the ship obviously were sufficient to precipitate an outbreak of **Salmonellosis**. We utilized a lot of drugs on the voyage. There is no doubt in my mind that the drugs work. However there is one thing in utilizing the drugs, the other is to administer them to individual animals, and what usually happens with the animals when they are ill is that they do not drink, or do not drink sufficiently enough and thus do not receive a therapeutic dose*"

In March **1982** the Australian Government sent a delegation to the Middle East to study sheep meat markets and animal welfare. It was reported that many issues concerning animal welfare, were ignored

by the responsible Minister. His comments were that any interference in the live sheep trade “would constitute excessive interference in the industrial development of other countries”. Since, over **160 million** animals have been shipped over seas and over **2.5 million** have died on the ships. It was also revealed about this time that sheep sent on long ocean hauls were 12 times more likely to die of stress, disease and accidents than sheep left in the paddock in spite of drought and bush fires.

The author (Dr Peter Kerkenzov) is an AQIS accredited veterinarian for live export (AAV), and a holder of a shipmaster’s Certificate of Competency Master Class 1 (unlimited) issued by the Australian Maritime Safety Authority (AMSA). The author has served on ships carrying horses, cattle, and sheep on ‘short hauls’ and ‘long hauls’ (> 10 days) and last served on a dedicated livestock ship as an Onboard Veterinarian in **2002** and as Master in **2003**. Notwithstanding the improvements in ship design, improved technology, scientific and practical knowledge, **unpreventable deaths** will always occur akin to that witnessed on the MV “Khalij Express” in 1980. The mortality rates will vary from what are considered within normal limits to excessive. Proponents of the trade argue that low death rates are an indicator of trifling cruelty. For example, because only 0.44% of the sheep die out of 65,000 sheep then that represents very little cruelty having occurred. This, of course, is an incorrect assumption or fallacy.



**Author with two Philippino stockmen**

The information following will be in point form (in no particular order) for ease of presentation. Most has been extracted from the author’s actual records

- The Australian Standards for the Export of Livestock (ASEL), as amended, reads as a highly commendable document. It covers all aspects of the export chain from sourcing suitable animals to disembarkation from the ships at the foreign ports. The Standards, however, state “*AQIS must be satisfied that importing country requirements and Standards have been met before issuing a health certificate and export permit*”. Else where it stipulates “*at disembarking, the master of the vessel transfers responsibility for the animals to the importer in the importing country, and should provide details of the voyage that may affect the future health and welfare of the livestock*”. These proclamations provide lustre to the accent on animal welfare; however, in reality are simply false piety or ‘lip service’.

- The Marine orders – Part 43: Cargo and Cargo Handling – Livestock, Issue 6 (Order No 13 Of 2006) pursuant to subsection 425(1AA) of the Navigation Act 1912 is also a praiseworthy manuscript and its implementation falls to AMSA. Basically, AMSA’s primary role is to ensure the ships’ equipment and systems are compliant at the point of loading before being permitted to load. Theoretically, however, once the vessel sails beyond the Exclusive Economic Zone (200 mile from base line). Australia loses any jurisdiction over the ship unless it is Australian registered. The Australian Quarantine Inspection Service (AQIS), on the other hand, are more concerned with animal welfare; however the same status quo would apply. AQIS relies upon voyage reports from the masters of the foreign flagged ships and the AAV’s as to what transpires on board and any action would have to wait until the ship was to return to Australia. Thus from the aforementioned, once a foreign flag vessel unberths the wharf and departs with a consignment of sheep, Australian authorities appear technically constrained from control over their destiny
- Confidentiality Agreements can become an imposition on the way AAV’s report the true picture of what really has been occurring on board ships for fear of retort. Theoretically the AAV is there to represent the interests of the animals and monitor compliance with reasonable standards, however any constructive criticism of the operation may result in the veterinarian losing future employment and hence a degree of pecuniary interest exists
- The selection procedure of sheep frequently becomes an animal welfare concern at times. In the photo the reader will notice severely debilitated sheep in the yards on the right. A dog was seen chewing on dead and dying sheep. It is here the final cull is performed by a veterinarian(s) at the Registered Premises or feedlots, after consolidation and acclimatization to the food pellets (South Australia), or at the quayside (Fremantle).

When sheep are given the final inspection before loading, they are run past experienced veterinarians, however due to the huge numbers and the time allowed, some sheep do pass through that would otherwise be culled. Such animals might include sheep suffering from early, unobvious Contagious Ophthalmia, early Inanition, sub clinical scours, Foot Rot (*Fusiformis necrophorus*, *Bacteroides nodosus*), and carriers of *Salmonella* sp., and sub-clinical respiratory disease.

At a South Australia feed lot in **2002**, Salmonellosis was diagnosed by a veterinarian after performing an autopsy. Sheep from the same mob that appeared healthy were passed and loaded. **40,038** sheep were loaded that day and by 1000 hrs the next day, after the ship had sailed, acute Salmonellosis was diagnosed on board. By 1530 hrs **eight** sheep had died from acute Salmonellosis (likely *S. typhimurium*, *S. Dublin* or *S. anatum*).



**South Australian Feedlot**

- Discrepancies in counting live and dead sheep has occurred. The number of dead sheep collected for the veterinarian, during the days at sea, did not always match up with that of the Chief Officer (C/O). The veterinarian's count was mostly less and the C/O's count more. The mortality rate recorded by the veterinarian for the Final Report would then be lower than it should have been. That is, many sheep have gone somewhere and that is over the side without being recorded or examined. It was also rumored amongst the officers that possibly more sheep were loaded than the official number. For example; 65,200 sheep loaded instead of 65,000 sheep
- The author's records show that on one voyage to the Middle East autopsies were performed on Deck 7 at 1530 hrs each day. At one end of the deck was a vertical shaft in which was rigged a block and tackle and cargo net. The cargo net was lowered to Deck 1 and remained there throughout the day. The stockmen on Decks 6, 5, 4, 3, and 2 would drag out any dead sheep from the pens, plus any sheep that were considered terminally ill and throw these down into the cargo net. The cargo net containing dead and live sheep was then drawn up to Deck 7 for autopsies. Their bodies were frequently broken by the drop, some from as high as deck 6. As mentioned in the previous paragraph, sheep alive and dead were also thrown over board and hence not recorded by the veterinarian. Despite efforts to stop this practice, including reporting the matter to the master, the dilemma was not resolved entirely and one can only assume it continued after the next crew change. A ship's crew list might number approximately sixty people who come from different countries. Language and culture barriers exist frequently making communications difficult. Irretrievably sick sheep are meant to be put down humanely. The incidents such as the throwing of live sheep down the vertical shafts are very unlikely to be included in a master's voyage reports, thus not putting at risk the companies' chance of losing the license to engage in this trade.



**Autopsy on Deck 7 mid Indian Ocean**

- It is assumed most consignments of sheep are sold using Documentary Sales or an International Sales Transactions. This would mean that once the sheep are loaded the risk moves to the consignee. The buyer may then look to the carrier if the cargo is lost or damaged. The carrier can always Note Protest as a defense. For example; bad weather. In the final analysis the ship owner or carrier must look after the cargo for payment of freight, however despite due diligence **unpreventable disease and injury** occurs and that is the nature of the live export trade
- The following is a list of diseases and other medical problems observed by the author. No laboratory back up was available to confirm a definitive diagnosis so the list is somewhat speculative. Notwithstanding this, most of the sheep that succumbed to disease(s) or injury suffered atrociously, bearing in mind different diseases frequently occurred concurrently

**Sheep:**

1. **Contagious Ophthalmia** (keratoconjunctivitis or 'Pink Eye') – presumably due to *Rickettsia conjunctivae*
2. **Salmonellosis** – presume *S. typhimurium*, *S. Dublin*, or *S. anatum*. No vaccine for sheep
3. **Enterotoxaemia** – *Clostridium perfringens* Type D (Pulpy Kidney) – vaccine
4. **Inanition** / inappetence / starvation - a pathological state of the body due to lack of any foodstuff (including water) which is essential to the living organism – many animals that passed the selection process ashore ('shy feeders') were obviously not eating pellets before embarkation. These were hollow in the paralumbar fossae (flanks) and accounted for early deaths
5. **Colibacillosis** (*Escherichia coli*)
6. **Septicaemia**
7. **Hematoma**

8. **Fractures**
9. **Dermonecrosis**
10. **Wool shedding** (extreme stress induced)
11. **Haematuria**
12. **Pneumonia** - truck diesel exhaust fumes during land transit, particularly whilst on the top decks, may be a predisposing factor for pneumonia developed at sea. The causative agents were suspected as being Pasteurella (Pneumonic Pasteurellosis), Mycoplasma, and /or Fusobacterium necrophorus
13. **Abortion** – well developed fetuses were observed. Approximately 50 pregnant ewes were on board
14. **Hyperthermia**
15. **Suffocation**
16. **Pigmentation of the kidney parenchyma** (plant?)
17. **Skin deficits due to trauma**
18. **Tracheobronchitis** (mucoïd to mucopurulent nasal discharge)
19. **Rhinitis** (serous nasal discharge)
20. **Ruminal tympany** (bloat)
21. **Pulmonary abscessation**
22. **Haemothorax**
23. **Rapid putrefaction / autolysis**



**Sheep arriving at the wharf in Fremantle**

- Due to the large numbers, many animals are found dead or terminally ill before treatment can be instigated. The terminally ill joined the dead into the cargo net (referred to earlier) or into the sea
- On arrival at the Middle Eastern ports, the Sovereign State's veterinary technicians embark to collect blood samples. The blood samplers are often seen to take up to **18** needle jabs before finding the jugular vein. During the blood collection procedure they lay their syringes and needles in faeces and dirt on the deck. Once the blood tests are deemed satisfactory, the animals are unloaded. It may be fair to say that those animals that die a quick death early in the export chain are more fortunate than those that show more resilience and make it to the 'other end'. It is at this point our poor animals lose any care the Australian AAV's can offer



- An extract from the author's daily log reads: *"Cases of pneumonia began appearing every day and the cause of this was thought to be a combination of inhalation of infective agents and manure gases (ammonia, hydrogen sulphide, methane and carbon dioxide), and hyperthermia. Ammonia acts like a 'sedative' expectorant by virtue of it causing an increase in protective mucus and lessening coughing. The sheep may acclimatize to some degree, to the ammonia gas. Manure gases may impose some degree of mucociliary dysfunction. Atmospheric levels of hydrogen sulphide may or may not be significant. Equipment is available to test for H<sub>2</sub>S at various locations throughout the ship. This gas is well known to cause acute primary pulmonary oedema"*.

### **Conclusion**

From the author's own experience, it seems very little had changed since the voyage of the MV "Khalij Express" in June, 1980 in that many disease processes are **unpreventable** due to being induced by excessive stress and fear. In addition, machinery breakdowns will continue to occur despite better back up systems. Ventilation and adequate air changes, and many other aspects of the whole seagoing operation are always at risk of becoming compromised.

Human beings that die of Salmonellosis, pneumonia, injury, starvation (inanition), apparently experience an appalling death no different to that of the sheep or cattle.



**A steer suffering from pneumonia and severe depression, mid Indian Ocean**

Despite the wide-ranging complicity to satisfy the export of sheep and cattle to foreign lands it is hard to come to terms that money, political gain, or religion are the driving forces allowing so much inhumanity to exist. If it were food then Australia can still provide the best chilled and frozen meat with a longer shelf life than any other competing country.

Regrettably, **extreme fear, unpreventable disease and injury are synonymous with 'long hauls' at sea carrying livestock** and this is undeniably unconscionable. On a random sample voyage to the Middle East; **14.1%** of the dead sheep died of starvation, **20.5%** died of enteritis (Salmonellosis, Colibacillosis), **54.3%** died from pneumonia, **1.3%** died from suffocation and **2.1%** died from trauma.



**Sheep suffering from pneumonia and severe depression being treated with oxytetracycline in the drinking water, mid Indian Ocean**

With due respect to some colleagues in the offices of Canberra who administer the bureaucratic affairs concerning the live export trade, there is no substitute for experience first hand. Since Australia's merchant marine is now markedly reduced, the ships engaged in the movement of livestock are foreign flagged. The crews are mostly foreigners and the only Australians likely to be onboard will be the Head Stockmen and the AAV's. If the AAV's are silenced by Confidentiality Agreements and only report what employers and administrators want to hear then this industry will be allowed to continue on for all time. The AAV system – with the veterinarian being employed by the exporter – may result in systemic failure because of the possibility of conflict of interest.

There comes a time when one has to draw a line in the sand and decide whether the incentives to continue (money, promotion, political gain or what ever) are really worth it.

The author conscientiously believes the above is a true and honest account of what typically has occurred over the years of transporting sheep and cattle from Australia to the Middle East, based on his experience. This portrayal has been given in good faith and without prejudice.

Yours faithfully,

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