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Submission by Animals Australia – July 2011

Senate Standing Committees on Rural Affairs and Transport Improvements in animal welfare for Australian live exports

This Animals Australia submission addresses the majority of the following Terms of Reference of the enquiry:

- 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;
- ii) ongoing monitoring of the subscription to, and practise of, animal welfare standards in all live export market countries;
- iii) actions to improve animal welfare outcomes in all other live export market countries and the evidence base for these actions.
- 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.
- 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.

Background: Animals Australia is a peak animal protection body, representing about 40 member organisations. Our involvement in animal welfare issues relevant to the live export trade spans over 30 years. Animals Australia (then the Australian Federation of Animal Societies) gave evidence to the first Senate inquiry into live export, which reported in 1985.

Animals Australia strongly opposes the export of Australian animals on animal welfare grounds. Our concerns relate to the additional handling and transport of animals in Australia, the arduous shipboard journeys and the handling and slaughter issues in importing countries – countries where there are no adequate legal or other protection for our animals.

Since 2003 Animals Australia has been heavily involved in investigating overseas conditions experienced by Australian animals exported by ship and (since 1980) has also sought to reveal conditions for those animals on board export vessels.

It is worth noting that there have been two major reviews of live animal export from Australia (and several other reports). These two reviews are the 1985 report of the Senate Select Committee on Animal Welfare and the Keniry Review of 2003, following the *Cormo Express* incident (when almost 6,000 sheep died aboard that ship after the shipment had been rejected by Saudi Arabian authorities).

The Senate report of 1985 focused on the live sheep trade to the Middle East. After considering all aspects of the trade, including selection and preparation of animals, feedlotting, transport to wharfside, the voyage, unloading, transport and slaughter, the inquiry concluded that

"if a decision were to be made on the future of the trade purely on animal welfare grounds, there is enough evidence to stop the trade...[which is] inimical to good animal welfare, and it is not in the interests of the animal to be transported to the Middle East for slaughter."

That Select Senate Committee identified the urgent need for improvement of animal welfare associated with the trade. However, it noted that such reforms would reduce but not eliminate the stress, suffering and risk associated with live export and that the long-term solution should be substitution of the live export trade with export of refrigerated sheepmeat. It recommended this latter should be encouraged by government.

The Keniry Review, more recent, indicated significant failings of regulation of the live export process which are regrettably still relevant today. Of importance to this Senate inquiry the Review noted that the welfare of animals exported live should be a primary consideration and that export consignments should meet <u>Australian</u> animal welfare standards. It presciently predicted the current debate, pointing out that

"the livestock export industry is part of the wider Australian meat and livestock industry and the way it operates has implications for the industry as a whole."

It also remarked that the live export industry was "uniquely and inherently risky." These previous enquiries and the live export industry's own reports show a high level of knowledge of significant and ongoing animal welfare problems, and demonstrate the failure of past efforts to reduce the suffering of Australian exported animals. Animals Australia's own investigations of the treatment of animals on ships and in importing countries and representation to Government and industry on these matters have fallen on deaf ears over the past three decades.

1. Introduction

This inquiry concerns the involvement and effectiveness of government, Meat and Livestock Australia ("MLA"), LiveCorp and others in improving the welfare in importing countries of Australian animals exported live.

To a large extent, the answers to many of the questions which the inquiry wishes to consider are not in the public domain. This in itself is a shortcoming which in our view reflects the lack of transparency concerning live export and the adoption by the three major players (the subject of this inquiry) of what appears to be an active policy of supplying misleading information and hiding potentially embarrassing information.

The responsible government department, the Department of Agriculture, Fisheries and Forestry ("DAFF") is in our view hopelessly compromised, as its responsibilities are to promote the export of both chilled and frozen beef and sheepmeat and live animals. DAFF, MLA and LiveCorp have consistently maintained that this does not give rise to a conflict, as the export market for live animals is distinct from the export market for chilled and frozen meat. We dispute this, and counter that the role of promoting trade in animal products and protecting the welfare of exported animals is incompatible.

The role of LiveCorp and MLA in seeking to improve animal welfare standards for Australian animals overseas is equally unsatisfactory. LiveCorp is an organisation which represents the interests of exporters, not farmers. In 2009 it had 50 members.² These exporters are in effect "middle men" who take orders from importers, acquire animals according to those orders, send them to a feedlot, then truck them to a port for export. The animals become the property of the importer usually at the point of loading onto the ship. Given this, LiveCorp can hardly be expected to act as a reliable and independent source of information for farmers.

The conflict for MLA is the same as the conflict for DAFF. In our opinion, promoting live export is an activity which undermines the position of MLA's main constituents: those who produce animals slaughtered to generate meat for export.

Animals Australia's view is that the main problem recognised after the airing of footage by "Four Corners" on 30 May 2011, and which is the stimulus for this inquiry, is that the live export industry is fundamentally different from the meat export industry in that external importing country 'quality' demands are virtually non-existent. It is that fundamental difference which has led to the present problems.

Many of the countries importing meat from Australia require that meat to be of a high standard. For example, the US Food and Drug Administration ("FDA") imposes requirements on importers of food, including meat, and also requires that foreign food processing facilities (such as abattoirs) allow inspections by the FDA. The European Union has imposed substantial requirements on Australian meat exporters in relation to its ban on meat from animals fed hormonal growth promotants. These requirements add to the cost of meat production for export.³ The consequences for exporters who do not comply with these standards are dire. The importing country concerned will simply refuse to accept the meat. This has serious

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¹ See for example http://www.daff.gov.au/animal-plant-health/welfare/export-trade.

² LiveCorp Annual Report 2009.

³ See for example Senate Hansard (Rural Affairs and Transport References Committee) 7 July 2011.

consequences not only for Australian meat exports but also for the reputation of Australia as an exporter in general, as evidenced by the meat substitution scandal which led to the Woodward Royal Commission of 1982⁴ and the subsequent *Export Control Act* 1982 (Cth).

As a result the export meat industry is now highly sensitised to the issue of overseas standards and in our view has a culture of compliance with regulatory requirements. By contrast, the live export industry exports animals to countries which do not impose similar high level requirements on the animals they receive. There is therefore, compared to the export meat industry, little incentive for those exporting animals live to seek to maintain standards of treatment for Australian animals overseas which relate to animal welfare; the importing countries themselves are not concerned to do that, so why should the exporters? Perhaps that is what Minister Ludwig meant when he described the live export industry (erroneously) as "self-regulating". ⁵

2. Promotion of live export to animal producers

LiveCorp, MLA and DAFF have aggressively promoted the virtues of the live export trade to the community at large. We do not propose to attempt to analyse promotion to producers or the community in detail as that information is now widely available, most under the 'We Care' motto. However, we do say that the thrust of the effort has been to seek to convince those who see the material, including animal producers and the community, that animal welfare is properly maintained during and after live export. Mortality statistics for shipboard deaths, reports on high mortality voyages, and Animals Australia's own investigations to the Middle East and most recently to Indonesia, are just some examples that have demonstrated repeatedly that animal welfare is not maintained in the live export trade.

3. Actions to improve welfare for Australian animal in importing countries

It is evident that the bulk (if not all) of the MLA / LiveCorp / government efforts to improve the welfare of exported Australian animals in overseas destinations has been in response to revelations by non-industry and non-government bodies, primarily by Animals Australia. Initiatives have coincided with Animals Australia's investigations and the resultant public outcry despite Australian animals being exporting to some markets for over three decades. We think this is an unacceptable situation.

The current concern, and the immense public response which has led to the present inquiry, is largely the result of the activities of an animal welfare organisation which relies almost totally on public funding and has one person, Lyn White, who is able to spend some time investigating animal welfare outcomes in destination countries. The only reason that our investigations have time and again shown such cruelty is simply because it is widespread and obvious. The repeated claims by industry and DAFF that our observations reflect the exception, rather than the rule, are unsustainable.

⁴ Royal Commission into the Australian Meat Industry.

⁵ Media Release by Minister Ludwig 7 July 2011.

⁶ See for example http://www.daff.gov.au/animal-plant-health/welfare/export-trade; www.liveexportcare.com.au (LiveCorp and MLA website); Independent review of the effectiveness of the additional \$1.50 beef marketing levy. Warwick Yates and Associates (2009) (prepared for the Beef Marketing Funding Committee and MLA).

We contrast this with the significant effort and expenditure (including taxpayer and producer dollars) brought to bear by MLA, LiveCorp and the government in public relations activities seeking to obscure the truth, to maintain producer confidence and convince the public that welfare improvements are being made.

We note in passing that the repeated claims by DAFF, MLA and LiveCorp that Australia is the only country making significant investments to improve animal welfare in importing countries is very misleading. Firstly, other countries invest significant sums in the OIE (which is the international organisation seeking to improve animal welfare). Secondly, and perhaps more importantly, the issue of investment to improve animal welfare overseas should be a commercial matter, primarily for private investors. Thus one significant improvement in the welfare of Australian animals exported live to Egypt has been brought about by the introduction of a closed system at Al Sokhna port (animals are processed through modern handling, feedlotting and slaughter facilities), which is an investment of Dubai-based DB World (although we note DB World did not invest in the abattoir). We understand the abattoir was constructed to meet EU standards for import of Egyptian meat.

It should be noted here that it was the public exposure by Animals Australia in 2006 of the atrociously cruel slaughter methods of cattle at the main (Basseteen) abattoir in Cairo - where Australian imported cattle were having their tendons slashed to bring them down for the throat cut – that led to an Australian Export Order which prohibits cattle from going to any abattoir other than the Al Sokhna facility. Still, and despite the opposition of Animals Australia and other animal welfare organisations, that facility uses a restraint device that rotates the cattle whilst conscious and does not stun the cattle before slaughter. Some one million Australian cattle were exported to Egypt (mid 1990s to 2005) and many were slaughtered at the Basseteen abattoir despite those cruel practices being known to the live export industry⁹. Similarly it was an Animals Australia investigation in late 2006 that in turn led to the current prohibition on the export of sheep to Egypt due to routine cruel handling and slaughter.

The question, therefore, is not how much Australia has invested overseas, but what the standards are and what can be done to improve them, irrespective of who is responsible for the improvement. For example, huge improvements in animal welfare in Jordan, including the introduction of pre-slaughter stunning for both sheep and cattle in major government abattoirs, have resulted directly from several Animals Australia investigations and Lyn White's close personal relationship with Princess Alia bint Hussein of the Jordanian Royal Family.

In 2007 Lyn White visited Jordan and witnessed cruel practices inflicted on cattle. She wrote to the Jordanian Royal Family requesting their intervention and through that approach was invited by HRH Princess Alia to visit Jordan to assess facilities and discuss ways matters could be improved. This was the start of a lasting relationship which continues.

⁷ Personal communication from Dr Alain Dehove, Co-ordinator of the World Animal Health and Welfare Fund on 11 July 2011. Main donors to OIE animal welfare focal point seminars are the EU and Canada. Other funds for animal welfare activities come not only from Australia, but also from the EU and USA (totalling about \$300,000 Euros in 2008-09).

⁸ Personal communication from Mr Rustom Dastoor, CEO DP World Sokhna, on 25 June 2011.

⁹ A full referenced timeline showing industry and government knowledge of the problems at Basetteen abattoir from 2001 can be provided.

Together with University of Bristol slaughter expert Dr Paul Whittington, Lyn White observed the operation of a rotating restraint box in the Greater Amman abattoir which had been installed by MLA and LiveCorp and half funded by the federal Government several years previous. This device was intended to restrain the legs of cattle, such that the animal was held securely in place when the box was rotated to the slaughter position. Because the device was inefficient in this regard, the animal usually ended up only being restrained by less than all its legs and often only one leg. The device was considered by Dr Whittington to be inhumane. Immediately after, in 2008, Animals Australia showed DAFF officials Lyn White's footage of the device in operation Jordan, and then Minister Burke responded by putting in place funding for an improved upright restraining box, which is now in operation and in which animals are stunned before slaughter.

This involvement also illustrates our view that in any case, many if not all of the actions taken by MLA and LiveCorp, often with government funding, said to improve animal welfare overseas, are ineffective. Jordan had been a major importing country of Australian animals for two decades, yet (as with Egypt) it was only the exposure of cruelty to imported cattle by Animals Australia that resulted in significant improvements in slaughterhouses.

4. Knowledge of animal welfare issues by the key industry and Government bodies

As a preliminary, we note that in our view any attempt to assess the welfare of Australian animals overseas by DAFF or MLA should be (and should have been) based on assessment by expert animal welfare specialists. By that we mean veterinary (or other) scientists who have experience and expertise in the area. MLA and LiveCorp have repeatedly claimed they have "animal welfare experts" on the ground in the Middle East. One such "expert" is Peter Dundon. To our knowledge that person and the other persons described by MLA and LiveCorp have no relevant veterinary qualifications or scientific publication record in this area.

a. DAFF

On the basis of the limited information which is publicly available, DAFF had and has some knowledge of deficient animal welfare standards in countries Australia exports live animals to, but has been derelict in its duty to ensure it is fully informed. Even when provided with information (at least by Animals Australia) it has on only rare occasions (i.e. Jordan's Amman abattoir slaughter box, and very belatedly in regard to Egypt) taken substantive action to address the issues. It is regrettably apparent however that until very recently DAFF and successive Government Ministers consistently refused to believe it was relevant for them to take responsibility for the welfare of Australian animals once unloaded in importing countries (correspondence over several decades could be provided if needed).

Thus, in 2006, The Hon Robert McClelland MP asked in the House of Representatives (Question on Notice No 3605) "what animal cruelty laws exist in the countries Australia exports live animals to?" The answer, from Minister McGauran, was "the Department of Agriculture, Fisheries and Forestry (DAFF) does not have specific details about the laws covering the handling of animals in markets to which Australian live animals are exported." When Senator O'Brien of this Committee asked a similar question of Minister Ludwig on 24 May 2011 regarding standards which apply in Indonesia, the Minister replied they were the "Indonesian regulatory arrangements."

¹⁰ See http://www.liveexportcare.com.

DAFF was clearly aware in 2007 of animal welfare problems resulting from practices in the Middle East, as a DAFF officer told this Committee on 14 February 2007 "there are a range of practices which as I understand have been shown in [Animals Australia footage] which clearly do not accord with the practices that we would regard as acceptable".

On 23 May 2007 Senator O'Brien asked this committee questions concerning treatment of animals in Egypt. The DAFF official responses established that the MOU with Egypt did not prevent the private sale of sheep for slaughter. Senator O'Brien referred to an answer to an earlier question in essence saying that the Minister had written to his Egyptian counterpart seeking advice on how the Egyptian government intended to ensure compliance with the MOU. At the time of the hearing DAFF stated no response had been received. It was also clear from DAFF responses to a question from Senator O'Brien about monitoring shipments of animals to Egypt to ensure compliance with the MOUs that the main mode of dealing with the issue was to raise concerns, identified by Animals Australia reports, with the Egyptian government. The Department representative also acknowledged that private slaughter would raise animal welfare issues "potentially about other countries as well." This was because they believed "that there are a combination of practices which occur in other markets." Senator O'Brien established that DAFF had not sought to implement MOUs to attempt to ensure that sheep were only slaughtered in abattoirs. Senator O'Brien also established that the MOU with Libya did not include protocols for handling the animals once they are unloaded, and that the only country which had such an MOU was Egypt.

The question of compliance with OIE recommendations was again raised by Senator Siewert in the Committee on 26 May 2008. She was told explicitly that the only country which addressed "post-arrival arrangements" was Egypt. When she asked what sanctions were in place in the event of non-compliance, the DAFF officer responded that "the ultimate sanction would be not to trade to that market."

Senator Siewert asked "do any of the countries that we have signed the MOUs with not meet the OIE guidelines?" The answer from DAFF was "we have not done a full assessment against each of the guidelines...so it is not really possible for me to answer that with any accuracy...the guidelines are guidelines...and countries may or may not meet those guidelines, obviously."

During the same session, the DAFF officer referred to footage from Animals Australia showing inhumane treatment of animals in the Middle East and noted "I have also been to a lot of these facilities...I am aware that some of these practices do go on..."

On 26 May 2008 Senator Siewert in this Committee asked questions concerning compliance in importing countries with OIE recommendations for animal welfare. The DAFF officer concerned replied that the Department had not "done a full assessment against each of the guidelines" so he could not say whether any of the countries with which Australia has signed MOUs concerning live export were not meeting the guidelines.

On 24 May 2011 Senator Coonan of this Committee asked the relevant DAFF officer about restricting slaughter of Australian cattle exported live to Indonesia to abattoirs with stunning facilities. The officer replied "that is something that would probably be difficult for us to speculate on in the sense that we are not that closely involved in the industry". He went on to say in effect that this possibility had not been explored with industry. When asked about

whether any officer from DAFF had observed the operation of restraint boxes for cattle in Indonesia, the DAFF officers responding were unsure; they thought the DAFF officer on the ground "probably" had inspected facilities. Dr O'Connell, Secretary of the Department told the Committee the Mark I tripping box is a "crush type affair". That in our view is misleading. The Mark I box is not a restraint box, it does not hold cattle tightly as an Australian 'crush' device does; it is a confinement pen that allows a worker to tie the legs and so acts as a tripping box and that should have been made clear.

We conclude from all of these comments that DAFF has been sufficiently (if not fully) aware of non-compliance with OIE recommendations in countries importing Australian animals for several years.

DAFF has been derelict in its duty to protect the welfare of Australian animals through its failure to be fully informed of the treatment of animals in importing countries, and perhaps worse, in its failure to take responsibility and act to protect welfare even when it has become aware of routine cruel treatment. DAFF's ready acceptance of industry assurances on animal welfare matters has been at least in part responsible for the current issue in Indonesia and leaves Australia exposed in regard to practices in other importing countries.

b. Animals Australia investigations

Given the failure of DAFF, successive Australian Governments and the live export industry to protect the welfare of animals once unloaded in importing countries, Animals Australia sought to document their treatment. Since 2003 Animals Australia has conducted first-hand investigations of the way in which Australian animals exported live are treated overseas and to provide that evidence to Australian decision makers and the community

A brief summary of the outcomes of these investigations is set out in Appendix 1. The point to note is that these are observations of extreme cruelty and unacceptable practices made at randomly selected locations. Contrary to statements by industry, Animals Australia is not in a position to carefully select locations and behaviour which paint a (misleadingly) negative picture, nor is that it's aim. Locations are simply visited if it is known that Australian animals are regularly or routinely handled, held and/or slaughtered at those facilities.

More importantly, the evidence Animals Australia has obtained clearly indicates that even where MLA, LiveCorp and DAFF has asserted that investment in infrastructure and training has improved welfare outcomes for Australian animals, subsequent visits by Animals Australia's investigators to the very facilities said to be improved has revealed that the same unacceptable practices continue. We have found that installed infrastructure is often left idle so that workers continue their existing practices, or those facilities are vandalized, stolen or become unusable due to lack of maintenance. Similarly, training has been shown (through our investigations or subsequent industry reports) to have been ineffective without ongoing oversight or due to high turnover of unskilled workers at facilities.

c. MLA / LiveCorp consultant reports

In our view, MLA has either sought to mislead the public or has chosen to ignore reality regarding the way in which Australian animals exported live are treated in importing countries. For example, Mr Palmer of MLA told this Committee on 20 October 2010 that MLA has "assisted in excess of 100 abattoirs in Indonesia with better slaughtering facilities

and stockmen training programs" and have "worked....right the way through into the abattoirs, around stockmen training, better animal welfare and better treatment of the animals."

The truth is that MLA ,LiveCorp and DAFF has been aware for at least ten years of the shortcomings of the Mark I tripping box seen in the footage aired by "Four Corners". As can be seen from that footage, even a non-expert observer will conclude that the principal purpose of confining cattle in the tripping box is to allow the animal's legs to be roped, so that when the door of the apparatus is opened, the animal falls sideways onto a concrete plinth. Once on the plinth, the slaughtermen can then attempt to cut the animal's throat. This is clearly a cruel procedure. Best practice standards forbid the use of such apparatus.¹¹

In one sense, it is perhaps not surprising that the tripping box (over 100 of which have been installed in Indonesian abattoirs by MLA / LiveCorp) is unacceptable in animal welfare terms. The motivation for its introduction was to enable Australian cattle to be more effectively restrained in order to allow leg roping, as without such an apparatus, attempts to restrain the animal increased stress and resulted in "dark cutting meat and reduced shelf life." This is because "abattoir workers in Indonesia, the Phillipines and the Middle East...will at times attempt to incapacitate Australian cattle prior to slaughter...". The Beere (2004) report also noted that the Australian animals are larger and less used to handling than Indonesian cattle and Indonesian workers were/are fearful of them; the tripping box, it was noted, was therefore also a means of enabling the opening up of further markets for Australian cattle because workers could then handle the Australian cattle.

Moreover, even though in 2004 MLA and LiveCorp were aware that the Mark I tripping box had "design faults", primarily that "an animal ...released from the...box...on tripping...will crash its head to the concrete plinth", those organisations subsequently continued with further installation of over 80 further Mark I tripping boxes after a report had reached that conclusion. ¹³

Mr Palmer's statement to this Committee in May of this year that training of Indonesian slaughter staff was improving animal welfare is not borne out by what his own organisation knew over 6 years ago. In 2005, an MLA / LiveCorp consultant noted that "the priorities of the MLA / LiveCorp joint program have been to target and support the leaders in the private abattoirs and the better managed public and provincial abattoirs. 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....". 14

Notwithstanding this recommendation, MLA, LiveCorp and the government continued to invest funds in training programmes. It is hardly surprising, given the consultant's view expressed some six years ago, that practices observed by Lyn White this year in Indonesian abattoirs were unacceptable.

¹¹ See Dr Temple Grandin's web page at http://www.grandin.com.

¹² Beere G (2004) Developing an improved pre-slaughter restraining box for cattle. MLA LiveCorp report LIVE.309.

¹³ Beere G (2004) Developing an improved pre-slaughter restraining box for cattle. MLA LiveCorp report LIVE.309.

¹⁴ Beere G, Pettiford S (2005) Opportunities to improve slaughter standards and profitability in Indonesia. MLA LiveCorp report LIVE.229.

Again, the approach adopted by MLA, LiveCorp and government has been to ignore reality and continue to waste money on projects which achieved nothing for the welfare of Australian animals. For example, projects supported by DAFF in 2009-10 under the heading "Indonesian point of slaughter improvements" included "providing animal handlers with training in standard operating procedures." ¹⁵

More recent MLA / LiveCorp reports have identified significant animal welfare problems in locations in the Middle East and south east Asia, although the reports are arguably written in a way which does not emphasise these problems. Most notably, the 2010 report of an "independent" expert group, led by Professor Ivan Caple (and including slaughter expert Professor Neville Gregory) described cattle welfare in Indonesia as "generally good", even though a close reading of the report shows that the group members observed practices suggestive of serious cruelty and ignorance of animal welfare. A detailed comment on this and other reports is given in Appendix 2.

5 Domestic economic impact

a. General

In our view, the several reports which have been produced over the last decade or so regarding the economic impact of stopping the live export trade have all been flawed. This is because we think that the key feature missing in all of these analyses is a detailed and quantitative perspective from the point of view of the meat processors. Statements to the effect that the live export trade cannot be substituted by processed meat can only be viewed with suspicion if there is no data available as to the spare capacity or willingness to expand capacity in the meat processing sector. This information itself will of course be influenced by what the participants in that sector regard as their business opportunities should live export cease. Significant Investment will only occur if there is some reasonable prospect (if not certainty) of greater throughput.

Remarkably, it appears that despite the importance of this factor in assessing the impact of the live export trade on the Australian economy, as recently as 2006 DAFF did not have any data on spare processing capacity in abattoirs in Western Australia and South Australia. Similarly, the Minister stated at that time that no research had been conducted into the potential impact of the cessation of the live sheep trade, and particularly the effect on meat processing (regarding GDP and employment). ¹⁶

We further note that MLA, LiveCorp and DAFF have over the years stated that somewhere between about 10,000 and 14,000 jobs are dependent on the live export trade. ¹⁷ This is in our view a further example of the way in which these bodies mislead the public. In our opinion the live export trade itself probably only involves a few hundred jobs directly (that is, employees of exporters and feedlotters). The other jobs are in functions which support the

¹⁵ See http://www.daff.gov.au/marke-access-trade/iac/live-animaltrade.

¹⁶ Question No 4883 in the House of Representatives to Minister McGauran by the Hon Robert McClelland on 27 November 2006.

¹⁷ See for example the answer given by Minister McGauran to Hon Robert McClelland's question on notice No 3605 (2006) that "the live export industry creates 12,924 jobs in the Australian economy."

trade, such as trucking, veterinary services, stevedoring etc. It is apparent that in the event the live export trade stops, many of those jobs will still exist if animals are processed in local markets. Moreover, in terms of benefit to the Australian economy, it is apparent that much of the flow of funds in the live export trade is in fact out of the country, as all of the ships used (for example) are foreign-owned, and the ship crews are almost invariably foreign nationals.

Finally, we note that cruelty to Australian animals exported overseas creates a bad image internationally and may have a negative impact on other Australian exports and hence the economy and jobs. This issue was said by former New Zealand Agriculture Minister Anderton to be a significant factor influencing the New Zealand government in stopping live export from that country. Indeed Mr Anderton emphasised that New Zealand had made great advances in increasing the export of high quality processed meat, which provided far greater returns in any case than live exports, both in terms of value adding and employment.¹⁸

b. Cattle

Any reduction in the live export of cattle from northern Australia will have a significant effect on only a limited number of enterprises. ABARE survey data showed that in 2004-5 (when just under 600,000 cattle were exported live), "only a relatively small number of [cattle producing] properties" (less than 20%) sold most of their turnoff for live export. At the time of the ABARE survey, about 50% of cattle-producing properties in northern Australia did not sell for live export at all.

Regarding the direct impact of cessation of the live cattle trade, it is important to note that the combined population of properties producing cattle for the trade (many of which also produce cattle for domestic slaughter) totalled just under 700 people in 2005.²⁰

An important effect of the live export trade in northern Australia which is often overlooked is the substantial investment by government in port infrastructure focused on live export. Hard numbers are not readily available, but we think it safe to say that the amount of money invested in, for example, Darwin Port specifically for live export represents a significant investment which does not have an equivalent in the domestic and export meat processing industry.

This becomes a matter for great concern when statements from the Indonesian government on future import demand are considered. The Indonesian government has since 2009 stated it aims to become self-sufficient in beef production (currently by 2014).²¹ This will result in significant decreases in the number of import licences Indonesia will issue for Australian cattle imports.²²

¹⁸ See the interview with Mr Anderton at http://www.abc.net.au/rn/saturdayextra/.

¹⁹ Live cattle export trade – importance to northern and southern australian beef industries. ABARE 2007.

²⁰ Live cattle export trade – importance to northern and southern australian beef industries. ABARE 2007.

²¹ See for example "Indonesia to spend \$14m on beef self-sufficiency plan" *Jarkarta Globe* 2 September 2009; *Australian Commodities* June quarter 2011 ABARES, page 61.

²² See "Jakarta plans deep cut to beef imports" *Sydney Morning Herald*" 6 July 2011.

It therefore appears that the Indonesian trade in live cattle, which seems to have been the justification for much of the investment in northern ports, may be about to decline significantly. It is hard to see how, when export of cattle to Indonesia does decline, the industry can replace that market, as the proximity of Indonesia means that shipping costs are much lower than they would be to a more distant replacement market.²³ MLA's statement that the situation is being monitored²⁴ is unsatisfactory, to say the least.

We are also very surprised that a very recent economic analysis of the live export industry commissioned by MLA and LiveCorp²⁵ does not mention the Indonesian policy of aiming for a self-sufficient supply of beef; it references a 2010 MLA statement to the effect that "robust population and economic growth...is expected to result in continued demand growth for Australian cattle over longer term (sic) despite recent difficulties in permit provision and enforcement of a maximum individual weight limit of 350 kilograms – this statement and that omission must undermine the credibility of that analysis.

A further obvious point is that as a consequence of the reduction in processing capacity in northern Australia, cattle producers in that region have become increasingly reliant on the live export sector as their sole customers. It is apparent that this represents a risky business model, in the event that the customer (as seems to be the case) decides to reduce its demand for the live exported product.

It is apparent that, from a business point of view, this issue must be dealt with by an across-the-board consideration of cattle production in Australia. If the Indonesian market for live cattle is on the wane, then it is obvious that one strategic response is to seek to expand markets for beef export as a substitute. Whether or not that can be accommodated so far as northern cattle producers is concerned is another issue. However, commentators have noted that establishment of extra processing capacity in the region may reduce the impact of a reduction in the live cattle export trade, although this will need to take into account the seasonality of cattle production in the region.²⁷

Related, recent industry and media reports confirm plans for an abattoir near Darwin (being built by AACo), one in northern Queensland, and a pre-feasibility study is underway (by the WA Department of Agriculture) into northern WA abattoir, probably for Broome. Cattle breeding initiatives are also underway to breed cattle more suited for higher quality meat production in northern Australia.

Any reduction in live cattle exports (i.e. primarily the Indonesian market) may be partially compensated for by export of beef to markets such as north Asia, the United States and the Middle East.

²⁵ The contribution of the Australian live export industry (2011) Centre for International Economics, Sydney.

²³ Australian Commodities June quarter 2011 ABARES, page 62.

²⁴ MLA Annual Report 2009-10.

²⁶ Live animal exports – a profile of the Australian industry (2008) ABARE.

²⁷ Australian Commodities June quarter 2011 ABARES, page 63.

c. Sheep

The live export of sheep served initially to give wool producers an additional return for sheep at the end of their productive life. This has not been the case for many years since Middle East customers demanded younger animals (during the 1990s). Sheep meat production has increasingly been driving developments in the sheep industry. Many producers have in any case diversified their activities from wool to other directions which offer better returns. The upshot is that there is a shortage of sheep for the live trade and sheep exported live are being shipped at much lighter weights than previously.²⁸

In conclusion, it is our strong view that the welfare of Australian animals cannot be protected in the live export industry, either during transport or in importing countries. Those involved in the trade – the live export industry and DAFF – have been aware of the suffering of Australian animals in importing countries, but have failed to protect Australian exported animals, as evidenced through their own reports and through the evidence documented during Animals Australia investigations. Please also refer to the appendices which follow.

I therefore reiterate that Animals Australia and its member societies oppose live animal export and strongly believe Australia should ban the practice outright.

This submission has necessarily been kept brief given the limited nature of this Inquiry and the short reporting time. However, further extensive information is available which could further assist with the Committee's terms of reference and can be provided. If public hearings are to be held, we request the opportunity to address the Committee and speak to this submission.

Yours sincerely,

Glenys Oogjes

Executive Director

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Appendix 1 – Animals Australia investigations (a short summary)

Appendix 2 - Comments on several MLA/LiveCorp reports on animal welfare issues in Indonesia and the Middle East

²⁸ See the MLA Briefing note on "sheep supply and producer attitudes" which reported the results of a 2010 survey of sheep producers; the number of sheep exported in 2009-10 was just over 3 million – over 1 million less than the previous year: *Livestock Products* March Quarter 2011, Australian Bureau of Statistics number 7215.0.

Appendix 1

Animals Australia investigations – a short summary

In 2003 Lyn White of Animals Australia visited Kuwait, where she witnessed the arrival and unloading of the MV Al Kuwait, carrying about 103,000 sheep from Fremantle. She also observed handling and slaughter of animals at the main livestock market (Al Rai). From this, it seems sheep were routinely trussed and transported in the boots of cars.

Sheep were also observed bring trussed and carried in car boots in Kuwait, Bahrain and Qatar in December 2005 and January 2006. Observations of the arrival in Oman of a shipment of Australian sheep aboard the MV Becrux indicated that sheep were then loaded onto trucks for a lengthy (15 hour) road journey. In Oman and Egypt Ms White observed sheep being unloaded at inadequate facilities where (amongst other things) they were required to jump or fall off the back of a truck, or were thrown into trucks. We note that since those observations sheep have been banned from being exported from Australia to Egypt, and the handling of Australian cattle in Egypt has improved, due to the introduction of a "closed system" for handling of Australian cattle and the use of new European- designed and installed unloading, holding and slaughter facilities at Al Sokhna. This occurred in response to the suspension of the trade to Egypt after (then) Minister McGauran observed Animals Australia video records depicting handling and slaughter practices in Egypt. (Note however, as mentioned in the full submission) cattle slaughter at the Al Sokhna facility is still inhumane as the cattle are rotated when fully conscious and killed without prior stunning).

Animals Australia investigator Lyn White has conducted a number of further visits to a number of Middle East countries (see below) to witness the treatment of Australian animals there. Most recently Ms White has documented cruelty to Australian cattle in Indonesia. Responses from industry to all of these reports has been to claim that they depict isolated instances; there have been allegations that the footage is fabricated or "old". In the case of the Indonesian footage, Scot Braithwaite, an employee of Wellards (a live exporter) claimed that Ms White bribed Indonesian slaughterhouse workers to obtain the vision she reported. Ms White and Animals Australia denies all of these allegations. They are without foundation. Ms White is prepared to attest under oath to the veracity and accuracy of all of the evidence summarised in this document.

In December 2005 and January 2006 Lyn White of Animals Australia conducted an investigation involving five Middle East countries over a 16 day period. In Bahrain, Ms White observed sheep being killed without stunning, often with multiple cuts to the throat.

In Kuwait, Ms White observed slaughter practices at the Shuwaikh abattoir. These involved dragging sheep to the slaughter floor and throat cutting while conscious. Ms White also observed cattle being manhandled by teams of slaughtermen, who pulled the animals to the ground before their throats were cut. She saw many instances of multiple cuts being required. Sheep were also seen being slaughtered in private places, including in the communal toilet of a boarding house.

During the same investigation Ms White documented evidence of high level cruelty inflicted on cattle in the main abattoir in Cairo. This included gouging of eyes, tendon slashing and beating with iron poles. On seeing this footage, (then) Minister McGauran acted to suspend the live trade from Australia to Egypt. A memorandum of understanding (MOU) was signed by the Australian and Egyptian governments in October 2006, seeking to ensure that Australian

animals are tracked properly following arrival in Egypt and are handled and slaughtered according to OIE recommendations.

Ms White again visited Egypt in December 2006, during the Eid-al-Adha festival of sacrifice. She once more observed inappropriate handling and slaughter of Australian animals, often in the open street, clearly in breach of OIE recommendations. This included trussing and dragging of sheep, the latter often by the legs, horns, wool or head. As observed previously, trussed sheep were often crammed into small car boots for transport. Sheep were also observed being tied to the roof rack of a car before being transported for 90 minutes. Sheep were observed being slaughtered in public areas, including in a shopping centre in the Maadi area. [This subsequent breaching of the MOU for sheep was provided to the Government, and eventually in 2008 replaced by an Export Order which prohibits sheep from being exported to Egypt, and for cattle to go through the Al Sokhna facility only.]

In September 2007 Ms White again visited Oman and Kuwait, and also visited the United Arab Emirates (UAE) and Jordan. Once again she witnessed and recorded images of severe cruelty inflicted on Australian sheep. ²⁹ In Abu Dhabi (UAE), she observed sheep being dragged and trussed, then transported in wheelbarrows into the abattoir, where they were tipped onto the slaughter floor for slaughter. In Al Ain (UAE) she observed Australian sheep being trussed and put into small car boots for transport on a day when the ambient temperature was about 45 degrees Celsius. Trussed animals were dragged from vehicles into an abattoir for slaughter. In Kuwait, despite earlier documentation of ill-treatment of sheep, once again Lyn White saw Australian sheep being pushed off the back of a truck (at an abattoir) and being dragged up ramps and being dragged from pens to be transported into an abattoir in a wheelbarrow. Similar scenes were recorded in Jordan. In Oman Australian sheep were transported for hours in high temperatures and dragged onto the slaughter floor of an abattoir.

In December 2007 Ms White visited Bahrain, UAE (Dubai) and Jordan to observe treatment of Australian sheep and cattle during the Eid festival. She once again observed sheep being trussed, dragged and thrown and sheep being slaughtered in public areas. Despite the claim by Meat and Livestock Australia of improved animal welfare in Bahrain (where the MLA Middle East office was located and where MLA employed a veterinary surgeon, Nigel Brown), Ms White once again observed (in all the locations visited) Australian sheep being trussed, dragged and put into car boots prior to transport. She saw sheep being slaughtered in public places.

Ms White witnessed the same array of unacceptable practices on visits to the Middle East in December of 2008 and December 2009.

In November 2010 Lyn White returned to Kuwait. Once again, in the Shuwaikh abattoir she observed trussed Australian sheep being dragged into the abattoir. Once again she saw sheep trussed with wire being transported in car boots, or being dragged to slaughter in public places.

Finally, in March 2011, Lyn White visited 11 abattoirs in 4 Indonesian cities in Java and Sumatra to record the treatment of Australian cattle being slaughtered. She observed the use of the Mark I tripping boxes installed by MLA / Livecorp. The footage she (and subsequently the ABC's Four Corners journalists) obtained showed these boxes allowed slaughtermen to rope the legs of cattle which were then tipped sideways out of the boxes onto sloping concrete ramps. This fall was often violent, and followed by the clearly distressed animals attempting to rise, whilst crashing their heads violently on the concrete floor.

²⁹ Footage can be viewed at http://liveexport-indefensible.com/investigations/middleeast07.php.

Ms White observed a total of 50 cattle being slaughtered, of which 40 were positively identified as sourced from Australia. During these slaughters, she also observed and filmed repeated instances of eye gouging, kicking the cattle, tail twisting and tail breaking. The footage was subsequently viewed by Dr Bidda Jones, Chief Scientist of RSPCA Australia, who quantified relevant parameters and assessed procedures for consistency with the OIE recommendations.³⁰ Dr Jones' report notes repeated instances of poor handling practices, including poking sticks into animals' hindquarters, anogenital region or eyes, slapping or kicking animals, tail pulling, tail bending, eye gouging and dragging.

Dr Jones' observations include that animals "cast" from a Mark I box often injured themselves by hitting their heads forcibly on the concrete blood drain. She noted that animals were often hosed or re-cut after the throat cutting operation and that workers did not check for consciousness before further processing. She also noted there was rope casting of Australian animals without use of any tripping box.

On a quantitative basis, the recordings showed what would be regarded as painful practices, such as use of goads (average of 22.5 per animal), tail pulling or twisting (average of 2 per animal), tail bending (average of 5.8 per animal) and eye gouging (average of 8 per animal) during rope casting. Where tripping boxes were used, 67% of animals observed were subjected to at least one painful procedure (most commonly tail twisting or pulling and use of goads).

In particular, the footage showed that slaughtermen cut the throats of animals on average 11 times and in one case the throat of one animal was cut 33 times. More than half of the cattle observed were probably conscious for at least one and a half minutes after completion of the throat-cutting procedure. One animal with a broken leg was beaten and kicked for 26 minutes before being killed. Another animal which regained its footing after having its throat cut was then assaulted by a slaughterman who slashed a leg tendon.

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http://www.banliveexport.com/documents/RSPCA-Australia-2011-Slaughter-of-Australian-Cattle-in-Indonesia.pdf. This report also details the locations visited.

Appendix 2

Comments on several MLA LiveCorp reports on animal welfare issues in Indonesia and the Middle East

1. MLA / LiveCorp Live Trade Animal Welfare Partnership 2009/10, Indonesain point of slaughter improvements.

Caple et al (2010),³¹ reporting on Australian cattle imported to Indonesia, observed that "reportedly" cattle truck drivers were responsible and financially liable for cattle they transported and that any financial losses as a result of poor welfare practices would be borne by the driver. The authors noted that "as a consequence of this liability, a high standard of cattle care was maintained...with drivers reportedly routinely refusing to transport unfit cattle." However, the authors also said "this could not be verified" and "such intervention was not observed". In other words, it appears the authors' observations were based on hearsay. This did not prevent them from commenting "the welfare of cattle transported in Indonesia was generally good". It is difficult to assess the extent of the observations and their detail, as the group responsible for the report observed various facilities for a total of only seven days in March 2010 and "transport and transport facilities were assessed wherever possible at feedlots." There was "observation of the unloading of a sample from about 2,900 cattle".

Thus it appears the Caple et al (2010) report cannot be relied on as reflecting a serious study of animal welfare during transport of Australian cattle exported to Indonesia. Their hearsay observations should be discounted. Observations that welfare was "generally good" relate to discharge of animals from one voyage and cannot be said to reflect the generality.

Relevant statements in the context of relevant OIE recommendations included that "there was little evidence of formal journey planning"; "cattle were not necessarily trucked during cooler times of the day"; "some journeys took up to three days"; "prolonged delays were possible due to the condition of roads"; "there was little evidence of contingency or emergency planning"; facilities were not available for cattle to be unloaded and rested during transport"; "some truck crate flooring was of a nonslip construction, however this was not standard as most trucks were multipurpose". These all represent failure to comply even with the very low standards of the OIE recommendations.

Caple et al (2010) carried out limited observations of cattle slaughter in Indonesia. They observed the slaughter of 29 cattle in 11 abattoirs. Given that the group which carried out the observations included two very senior scientists (Professors Caple and Gregory; the latter in particular is expert in animal welfare matters) it is difficult to understand why the report produced is lacking in detail, virtually non-quantitative and could even be said to be misleading by virtue of its emphasis on "acceptable" practices while de-emphasising unacceptable practices.

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³¹ Caple I, McGown P, Gregory N, Cusack P (2010). Live Trade Animal Welfare Partnership 2009/10; Indonesian point of slaughter improvements (at http://www.daff.gov.au/_data/assets/pdf_file/0005/1886477/indonesia.pdf.) Note this is a report commissioned by MLA and LiveCorp, although it is to be found on the DAFF website.

In particular, the Executive Summary said "animal welfare was generally good". However, the Summary of the section on slaughter said "slaughter was considered to pose the greatest risk to animal welfare." These two statements are incompatible and give rise to concerns about bias in the report. Our primary concern is that, contrary to the approach adopted in the report, the view should be that animal cruelty and bad welfare is utterly unacceptable and cannot be offset by any number of "acceptable" practices. This should have been categorically stated in the report and the instances of cruelty should have been heavily emphasised and criticised.

The Caple et al group observed the slaughter facilities were "typically free of offensive smell and animal noise suggesting a good standard of animal welfare." This seems a dubious conclusion. Crucially, this group's report noted that "most facilities were unsophisticated and the adoption of stunning technology would be unfeasible." The group observed a total of 15 MLA / LiveCorp "Mark I" "restraining boxes".

We note the misleading use of this terminology, as in our view these boxes are better described as "tripping boxes". It is evident that the use of "tripping boxes" is well known to the industry, as Dr Temple Grandin said in 2007 that "trip floor boxes...should never be used" in ritual slaughter of animals. The Caple et al report noted several animal welfare issues with the use of the tripping boxes. These included that 17% of observed animals regained their feet on release from the box, and there were a significant number of what were described as "head lifts" (average of 3.5 per animal – although the range was not recorded), which were said to "pose a significant risk to animal welfare", although why this should be so is not stated. One paragraph implied (but did not quantify) that there were incidences of severe falling and "head slapping" (not defined) which caused "significant animal welfare issues" (not defined).

The group observed in one case that "up to 18 cuts" were necessary in the throat slitting process. Although details were not given, the report said "in some instances where stunning was not used the delay between restraint and slaughter was significant". This is a most unsatisfactory statement, given it would have been so easy to observe the length of the delay. Bleeding was said to be significantly impaired in 10% of cattle (no number given, but presumably 3) "possibly resulting in extended consciousness". It was also said that "there were occluded carotid arteries in 48% of cattle", but again this observation is useless unless the time to unconsciousness is recorded. The issue of delayed bleeding out was recorded as not being an issue the slaughterers were aware of as having animal welfare implications.

The report seemed to indicate that, as wet market purchasers of beef were not concerned about meat quality (which could be lowered by bad slaughter practices), there was little incentive for slaughterers to improve animal welfare. "Animal handler and slaughterman competency" were said to be "the greatest factors" potentially impacting animal welfare. This is a curious conclusion, given there was seemingly no attempt to quantify any of these matters.

Section 5.3.2 of Caple et al (2010) reviewed slaughter of the 29 cattle in the context of compliance with the OIE recommendations. Unloading facilities were described as "reasonable" (not defined). Handling was said to be "generally acceptable", although no details were given of unacceptable practices implied in this statement. There was misuse of an electric prod on one occasion. There were "instances of unnecessary stimulation involving interference with the

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³² Grandin T (2007) *Recommended Animal Handling Guidelines and Audit Guide*. American Meat Institute Foundation. See also http://www.grandin.com/ritual/evaluation.restrain.methods.kosher.halal.html, in which Dr Grandin says "trip floor boxes that cause the animal to fall down with the use of a slanted floor or other device" should not be used.

eyes and tail twisting". The choice of words is odd. The exact behaviour should have been described in detail and the number of observations and location(s) specified. Given what Lyn White observed in Indonesia, it appears likely these descriptors refer to extreme cruel practices. Indeed in an interview transcript from the ABC Four Corners program 'A Bloody Business' (of 30 May 2011³³) Professor Caple stated he saw '…sometimes a finger was in an eye socket' and the inappropriate use of goads and sticks on the cattle, and in one instance an animal with a broken leg that was not appropriately attended to.

Handler skill was said to range from excellent to poor. Again, this is unacceptable – detail should have been provided. Observations of behaviour along the lines of animals being "typically" calm and "inclined to become agitated" during restraint are unscientific and unhelpful. They should have been quantified in detail. The group noted that "buckets of water" were thrown over animals (unquantified) before slaughter. As evidenced from Lyn White's observations, this process creates severe animal welfare problems, but the Caple et al report did not sufficiently quantify or emphasise this point.

The bias which seems to be evident throughout the report is evident where it was noted that sick or injured cattle were "reportedly" dealt with as soon as possible, but there was an "exception" where an injured animal was left for "an unacceptable length of time". These are not the comments which would be made on the basis of scientific observation and it is very disappointing that those responsible for this report seem to be prepared to believe hearsay whilst de-emphasising their own observations.

A similar non-quantitative approach was taken to descriptions of facilities, with the use of words such as "generally" and "typically" often employed. The clear implication is that compliance with even OIE recommendations is not universal, although again the failure to quantify observations makes it impossible to draw any conclusions.

Perhaps the most important observations in Caple et al (2010) related to stunning. It was said that "stunning is rarely practiced" despite being allowed under Halal rules. An attempt to initiate stunning trials failed, due to unwillingness on the part of the local abattoir staff to participate. Crucially, the report said "stunning was observed to overcome the majority of risks to animal welfare associated with the slaughter process and the use of stunning should be promoted at every opportunity." This is, of course, not relevant to questions of compliance with OIE recommendations, which permit slaughter of all species without stunning. However, even where stunning was used, there were problems, as the time Caple et al (2010) recorded between stunning and sticking was probably too long, as it was said to be "not always less than 20 seconds" and clearly was up to 30 seconds.

2. Whittington P, Hewitt L (2009). Review of the Mark I, II and III cattle restraining boxes (MLA / LiveCorp report W.LIV.0371).

This MLA / LiveCorp sponsored review examined "traditional" cattle slaughter methods using various designs of "tripping boxes", including the Mark I design, over 100 of which have been installed in Indonesian abattoirs since 2000. However, the report did not say where its observations were carried out.

³³ http://www.abc.net.au/4corners/content/2011/s3230575.htm

Nevertheless, in connection with the use of the Mark I tripping box, the report noted that the box did not control the casting process and there was a welfare concern being "the occasional severity with which the animals fall onto their side on the concrete plinth" and "...repeated attempts to regain posture can cause the animal to impact its head and body against the hard surface". Importantly, the report noted that "the actual impact [of the Mark I box] on animal welfare requires scientific validation...". The casting (tripping) with the Mark I box was said to be "relatively uncontrolled". It was apparent several of the entry ramps for the Mark I box did not have non-slip flooring.

3. MLA / LiveCorp Live Trade Animal Welfare Partnership 2009/10; Middle East livestock slaughter and handling improvements (at.) Note this is a report commissioned by MLA and LiveCorp, although it is to be found on the DAFF website. http://www.daff.gov.au/ data/assets/pdf file/0010/1886482/middle-east.pdf

Sheep

Reporting on slaughter facilities in Kuwait City, the review noted that the third largest facility, which processes 15% of Australian sheep, had "standards...found to be acceptable." There was no definition of what was "acceptable". The other four facilities (ie slaughtering 85% of Australian sheep) are said to be "traditional (Bedouin style) operations...". "Traditional slaughter" was said to involve "slaughtering and skinning livestock on the floor", and slaughter "in front of other animals". Animals were said to be "dragged from the lairage area to the point of slaughter", and this was noted to be "inconsistent with OIE guidelines" (see Article 7.5.2 - 1). The report said that one sheep slaughter table had been delivered to "abattoir 1" (not defined – further reading indicates this is the abattoir owned and operated by the municipality which processes 60% of Australian sheep), although it went on to note "there has been some lack of engagement in the use of the table by the slaughterman as they prefer to continue with existing practices." The report describes installation of new ramp and table facilities which in the first week were said to have improved handling practices significantly. However, the report also noted there was significant resistance from local workers to the improvements. Other infrastructure facilities have been installed at a second abattoir and are said to have resulted in the improvement of handling practices, particularly dragging sheep.

The problem with this report is it identifies significant problems in most of the abattoirs, particularly unacceptable handling and slaughter procedures. It is apparent that these procedures are still in place in most cases. However, where it is claimed improvements have been made, there is no attempt to audit the effect of the improvements, nor to assess their impact over an extended period of time.

The report also refers to abattoirs in Qatar, where there is one major importer who also operates a processing facility, and two public abattoirs. The former processes "virtually all" Australian animals. "Poor handling practices and reduced welfare" (undefined) were observed at this abattoir. The report said that installation of a new restrainer (for sheep) would improve matters, although any improvement was not reported or quantified.

Cattle

It was noted that "industry has previously installed restraining devices in the Middle East which have not been utilised or poorly maintained" (no further definition given). The report says a "new design restraining box" has been developed which is a "low cost, simple design that allows animals to be processed humanely" and which can be used manually. It is unclear whether this box is a restraining box, or a tripping box.

The commercial processing facility for cattle in Qatar is said to be in need of some improvements which would "dramatically reduce the stress in cattle". The implication is that cattle at this facility are stressed.

In Qatar, the public slaughter house, said to process "limited Australian cattle" is "a traditional slaughter hall with no cattle handling facilities or restraining box infrastructure." There are "animal welfare issues" said to result from "the use of traditional slaughter methods with the roping and tripping of cattle." Although no details are given, it is apparent there are problems with both of these facilities.

The cattle slaughter at two facilities reviewed were said to be "traditional slaughter floors" with no "restraining infrastructure." There is roping and tripping of cattle prior to slaughter.

There was an attempt to carry out a trial of pre-slaughter stunning of sheep in Bahrain, which was "delayed due [to] local sensitivities."

Submission ends.