

Fremantle Export Inspection Review

Submission

s. 22

Introduction:

The following is based on fact. I have received (by email) hundreds of photos and videos of non-compliance of existing State Animal Welfare Acts and the World Organisation for Animal Health (OIE) Terrestrial Animal Health Code involving sheep destined for live export to the Middle East and North Africa (MENA). It has become evident, even after the series of reviews so far, the level of animal welfare offered to these sheep only equates to their monetary value. We can no longer remain passive bystanders knowing Australian sheep are constantly being exposed to unlawful harm and suffering. There is nothing ethically acceptable or respectable about the live export of sheep and no amount of commercial value derived from this trade should justify the suffering endured. Australia's live sheep export industry to the MENA (ocean hauls > 10days) has been beleaguered by ongoing disasters year after year since the late 1970's notwithstanding successive Governments, pertinent primary and sub-ordinate legislation, veterinary research, enhanced shipping technology, numerous reviews, numerous reports and the development of the Australian Standards for the Export of Livestock (ASEL). An Order under the Australian Meat and Livestock Industry Act 1997 refers to ASEL however there exists a divergence of opinions as to whether these standards are enforceable.

Conducting review after review is not going to improve the welfare of live sheep exported from Australia when the ongoing calamities of the trade are unpreventable. As time goes by, it becomes more evident that any investigation undertaken by the Department of Agriculture, Fisheries and Forestry (DAFF) is tainted by the fact that DAFF both promotes and investigates the trade therefore by law their findings would be invalid. It follows then that these continuing reviews amount to being a sham.

Topics of Concern:

1. *The Farmer Review Recommendation 6 – The Review recommends that a comprehensive review of the ASEL be undertaken. The review should inter alia examine the policy on export of sheep from southern ports to the ME in winter months, with a view to:*

Mitigate feedlot and shipboard losses in adverse weather conditions

Mitigate losses from heat stress and inanition during voyages

Comments:

- Sheep do not have to be subjected to adverse weather conditions before dying by the hundreds. Sheep have been observed to die from Salmonellosis/Inanition Complex within

24 hours of departure when the sea state has been described as 'a slight sea on a low swell' and the weather 'fine and clear, 5/8 cloud and a gentle breeze from the northwest'.

- Sheep are innately feeble mariners and the reasons for this are multiple. Stress is a major factor particularly in the MENA live export trade. It is accepted in the scientific forum that extremely stressed animals are more likely to submit to disease processes such as the Salmonellosis/Enteritis Complex.
- DAFF so far have declined to provide independent veterinary scientists the Heat Stress Risk Assessment Model (HSRA) used by Meat & Livestock Australia (MLA), even though this model is part of Australian legislation. The reason given is that "Hotstuff" is regarded as being "commercial in confidence". This model, along with the Load Plan, should receive full attention when preparing a Consignment Risk Management Plan (CRMP). If the model is flawed then the CRMP 'signed off' by the Secretary of DAFF, would also be flawed.
- There is adequate evidence from high mortality investigations, routine voyage investigations and research into simulated voyages that the HSRA does not prevent seriously poor animal welfare in the Middle East (ME) summer and repeated high mortality incidents in both sheep and cattle.
- Recent documentary evidence exists of Australian sheep being road transported and loaded to a ship in Fremantle during a 43^o C heatwave. This is a violation of the World Animal Health Organisation (OIE) Terrestrial Animal Health Code (standards) that is purportedly recognised by the Australian Government.

2. *The Australian Government says it is committed to the live export industry and to deliver reforms that provide stability for the industry and thousands of jobs. The reforms to domestic and international supply chains ensure Australian livestock exported for slaughter are treated at or above internationally accepted animal welfare standards*

Comments:

- Recent photographic documentation provided shows non-compliance of OIE standards at Australian ports. Sheep have been loaded when clearly not 'fit to load'.
- Recent photographic documentation shows sheep being repeatably road transported in trucks where the stocking density has grossly exceeded the relative state Land Transport codes.
- Electric prodders have been used on sheep when loading and unloading trucks at Australian ports. These prodders have regularly been recorded being used on the faces of sheep. The OIE recommendations clearly state these devices are not to be used on sheep.
- There can be no stability for live sheep export industry and jobs when documentary evidence shows ongoing profound animal cruelty, ongoing publication of corrupt statistics, lack of regulating non-compliances and falsification of reports. The exposure of such factors is increasingly drawing public attention to the live export trade and adversely affecting public perception.
- It is known that only a select number of veterinarians are employed by the exporters and this raises many questions. Independent veterinarians employed by DAFF Biosecurity (AQIS) have been recommended repeatedly but resisted in the industry.

- Evidence is available to demonstrate AQIS accredited veterinarians (AAV's) (employed by the exporters) and AQIS veterinarians have repeatedly breached Table A3.1.2 ASEL in that they have failed on many occasions to comply with rejection criteria. Sheep displaying Keratoconjunctivitis (Pink Eye) have frequently been loaded and countless numbers have been exported in this condition.
- Veterinary services utilized to counteract the risk of Salmonellosis / Enteritis Complex disease outbreak on ships are deemed inadequate. The export companies' methodology to counteract the risk of Salmonellosis / Enteritis is usually described 'commercial inconfidence'. It is however known, visual inspections are relied upon to detect 'diseased' sheep and to select sheep that appear healthy, well rested and fully adapted to the diet that they will receive on board the vessels. 'Infected' 'carrier' sheep (not showing evidence of disease) walk on ships undetected. Laboratory testing (bacterial culture, ELISA, PCR, etc.) is usually not carried out because most mobs of sheep will show up positive to Salmonella spp.
- It is known large increases in faecal excretion of Salmonella spp. from sheep can occur immediately after their arrival in the assembly feedlot (Registered Premises) and Salmonella spp. can persist in the feedlot environment between consecutive batches of sheep initiating new epizootics in subsequent consignments. Similarly, the ships are liable to be contaminated regardless of being washed down with 4% Soda Ash on the return voyage to Australia.
- Meaningful conclusions on mortality, based on any biostatistics, must depend on the accuracy of the numbers recorded but unfortunately sound evidence now exists that loaded sheep numbers recorded are frequently wide of the mark. Inaccurate recording of numbers is at odds with the Export Control (Animals) Order 2004 in which the words "specific number" is used, and the counting of sheep can be an accurate process using hand counters.

Conclusion:

Since Australia is a signatory of the World Organization of Animal Health (OIE) then full compliance with the Terrestrial Animal Health Code should be a priority. Poor veterinary services, incorrect recording, falsifying biostatistics, poor animal husbandry practices including working sheep in extreme heat, the use of electric goads and inattentiveness to density when loading and transporting, all amount to poor governance and disregard for the animal welfare.

The generally accepted average, natural attrition rate on Australian sheep farms is 2% to 5% per annum. This loss is mostly due to endoparasites, fly strike, drought, bush fires, floods and the ingestion of toxic plants. On long hauls at sea, the death rate is considered acceptable if < 2% per voyage. The causes of death are not the same as that seen on the farms. On a random sample voyage to the ME 14.1% of the total number of dead sheep died of starvation (inanition), 20.5% died from enteritis (Salmonellosis, Colibacillosis), 54.3% died of pneumonia and 1.3% died from suffocation and 2.1% from trauma. Overall, the main killers are Salmonellosis / Inanition Complex, pneumonia and hyperthermia. Sheep that die in this manner do suffer an insufferable death and at a higher rate than on farm. Best estimates indicate that approximately 5 x as many sheep die on a routine voyage compared to the number of similar class sheep during the same time period on land.

Statistical analysis has traditionally been used to justify the live export of sheep (biostatistics) and aid in decision making to reduce mortality rates. As the loaded numbers are known to be inaccurate, any such assessment is fundamentally flawed.

Having found inconsistency and inaccuracy exists in many instances in the live export of sheep, reliance on any biostatistics offered by export companies, DAFF/AQIS, MLA and LiveCorp must be viewed with caution.

Extreme conditions of heat (> 40⁰ C) exist from time to time in Australia and such conditions are repeatedly ignored when loading and transporting sheep for export. OIE Code Article 7.3.5. 1

Planning the journey - In some extreme conditions of heat or cold, animals should not be transported at all.

Working sheep in temperatures peaking at < 40⁰C at all, must surely represent poor husbandry practice and poor animal welfare.

Over the years, millions of sheep have died at sea, an immense number from Salmonellosis / Enteritis Complex and heat stress. The live sheep export component of live animal export should be dismantled as soon as possible and replaced with a meat processing industry where chilled and frozen meat is exported as a more profitable alternative.

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