



Review of the Inspection Regime Prior to Export of Livestock from Fremantle Port



© Commonwealth of Australia 2013

Ownership of intellectual property rights

Unless otherwise noted, copyright (and any other intellectual property rights, if any) in this publication is owned by the Commonwealth of Australia (referred to as the Commonwealth).

Creative Commons licence

All material in this publication is licensed under a Creative Commons Attribution 3.0 Australia Licence, save for content supplied by third parties, logos and the Commonwealth Coat of Arms.



Creative Commons Attribution 3.0 Australia Licence is a standard form licence agreement that allows you to copy, distribute, transmit and adapt this publication provided you attribute the work. A summary of the licence terms is available from creativecommons.org/licenses/by/3.0/au/deed.en. The full licence terms are available from creativecommons.org/licenses/by/3.0/au/legalcode.

This publication (and any material sourced from it) should be attributed as: DAFF 2013, *Review of the Inspection Regime Prior to Export of Livestock from Fremantle Port*. CC BY 3.0

Cataloguing data

DAFF 2013, *Review of the Inspection Regime Prior to Export of Livestock from Fremantle Port*, Department of Agriculture, Fisheries and Forestry, Canberra.

ISBN 978-0-9808519-9-1 (online)

Internet

Review of the Inspection Regime Prior to Export of Livestock from Fremantle Port is available at daff.gov.au

Contact

Department of Agriculture, Fisheries and Forestry

Postal address GPO Box 858

Canberra ACT 2601

Australia

Web daff.gov.au

Inquiries regarding the licence and any use of this document should be sent to copyright@daff.gov.au

The Australian Government acting through the Department of Agriculture, Fisheries and Forestry has exercised due care and skill in the preparation and compilation of the information and data in this publication. Notwithstanding, the Department of Agriculture, Fisheries and Forestry, its employees and advisers disclaim all liability, including liability for negligence, for any loss, damage, injury, expense or cost incurred by any person as a result of accessing, using or relying upon any of the information or data in this publication to the maximum extent permitted by law.

Table of Contents

Summary and Recommendations	4
Part 1 - Background of the Review	7
Part 2 – Undertaking the review.....	16
Part 3 - Findings and Recommendations	20
Part 4 – Assuring effectiveness of the recommendations and conclusions	30
Appendices *.....	31

Acronyms and Glossary

ASEL	Australian Standards for the Export of Livestock (Version 2.3) April 2011
AAV	An AQIS Accredited Veterinarian who is accredited by DAFF to carry out duties in relation to the export of livestock
AEP	Approved Export Program
CRMP	Consignment Risk Management Plan
DAFF	Australian Government Department of Agriculture, Fisheries and Forestry
ESCAS	Exporter Supply Chain Assurance System
Export Control (Animals) Order 2004	This order sets out the arrangements for the export of live animals including livestock under regulation 3 of the <i>Export Control Orders Regulations 1982</i>
Exporter	The person intending to export the animals
NOI	Notice of Intention
Registered Premises	For holding and assembling of livestock for export and pre-export quarantine or for isolation of livestock for export
Unfit to Load	An animal is not fit for the journey if it: <ul style="list-style-type: none"> - Is not strong enough to undertake the journey - Cannot walk normally, bearing weight on all legs - Is severely emaciated or visibly dehydrated - Is suffering from severe visible distress or injury - Is in a condition that could cause it increased pain or distress during transport - Is blind in both eyes - Is in late pregnancy
Unfit to Export	Same as 'Unfit for load' including suffering conditions consistent with the rejection criteria from the ASEL S1.7 and does not meet importing country requirements
OIE	World Organisation for Animal Health

Summary and Recommendations

Summary

Australia is the world's largest exporter of live animals and many of these animals are exported from the southern ports of Fremantle, Adelaide and Portland. In 2011, Australia exported 123,993 cattle and 1,671,357 sheep from Fremantle Port.

In July 2011 as part of the Independent Review of Australia's Livestock Export Trade (the Farmer Review), Mr Bill Farmer AO visited Fremantle to view the inspection process at Fremantle wharf and the registered premises. Mr Farmer was concerned about the number of sheep he saw on the day that had arrived at the wharf that were not fit for export and the inspection process at the wharf.

In 2012 there have been a number of consignments unable to unload on arrival in the designated country of destination. These events have received intense media attention and resulted in renewed public concern about the live export trade. Such events confirm the importance of the inspection process in ensuring that animals loaded onto vessels are 'fit to export' and meet importing country requirements.

The Fremantle Review Steering Committee was established in July 2012. The committee met with a range of stakeholders, received public submissions and visited the Fremantle port and registered premises, and the Adelaide port to view the inspection process. The committee also visited Portland, Victoria and viewed the inspection facilities at the registered premises.

The steering committee representative for the Australian Livestock Exporters' Council has clearly registered his dissent to this report.

The aims of the recommendations in this report are to ensure that throughout the inspection process:

- the welfare of the animal remains the primary consideration at all times
- that all people handling the animal along the live export chain have the appropriate competencies and training if required
- animals unfit to load or export are identified and dealt with in a timely and humane way
- that the inspection of livestock for export is always undertaken using adequate facilities
- sufficient records are kept on the selection, inspection and rejection process to support a quality assurance approach and further investigation of any incident if required.
- only animals fit for export are loaded onto a vessel.

Recommendations

Recommendation 1 (to the ASEL Steering Committee)

Identify the roles and responsibilities of all parties who interact with the animals throughout the live export chain including the legislative requirements.

Recommendation 2 (to the ASEL Steering Committee)

- Identify in ASEL the competencies and training required for all people who interact with the animals throughout the live export chain from sourcing to loading.
 - Ensure that individuals placed in such roles have an understanding of their responsibilities and are competent to perform their duties.
-

Recommendation 3 (to the ASEL Steering Committee)

Outline in the ASEL what record keeping must be done throughout the different stages of the inspection process starting from receipt of the animals at the registered premises, how often, who keeps the information and who it must be made available to when required.

In particular:

- DAFF to develop templates to support the record keeping requirements for AAVs as stated in *Export Control (Animal) Orders 2004* (part 4A 14)
 - The requirement for record keeping of rejection at unloading set out in S3.17 to be expanded to cover animals rejected at all stages of the assembly process
 - A consignment report summarising animal health issues, reasons for rejections, adverse events and treatments should be provided to DAFF and the onboard AAV prior to issuing the export permit.
-

Recommendation 4 (to State and Territory Governments)

Animal welfare inspectors who are responsible for the welfare of livestock should have free access throughout the live animal export chain up to and including the point of loading, to ensure compliance with state and territory Animal Welfare Acts.

Recommendation 5 (to the ASEL Steering Committee)

The primary point for individual inspection should be at the registered premises and the facilities and inspection process must be designed to reliably assess each animal for fitness to travel and against all of the ASEL rejection criteria.

Recommendation 6 (to the ASEL Steering Committee)

The Approved Export Program should document where and how the individual inspection of livestock will be conducted at both the registered premises and the wharf including the procedures when dealing with rejects.

Recommendation 7 (to the ASEL Steering Committee)

That at each point in the supply chain, inspection procedures and facilities are in place to allow the identification and removal of unfit animals in a timely manner to ensure that animals unfit for transport or export are not transported to the next stage.

Recommendation 3 of the Farmer Review

The committee reaffirms Recommendation 3 of Farmer Review, acknowledges that industry has commenced this work and believes that this should be given priority.

Farmer Recommendation 3 states:

The Review recommends that in line with ASEL, that industry develop and implement a through-chain QA system to complement government regulatory compliance programs.

The recommendations made in this report link to the Australian Standards for the Export of Livestock (ASEL) Version 2.3. These standards are being revised and relevant recommendations from this report will be provided to the steering committee reviewing ASEL for their consideration.

Part 1 - Background of the Review

The Minister for Agriculture, Fisheries and Forestry announced on 13 June 2011 that an independent review into Australia's livestock export trade would be undertaken by Mr Bill Farmer AO. The *Independent Review of Australia's Livestock Export Trade* (the Farmer review) was commissioned to seek advice on the long term sustainability of the livestock export trade. The final report was provided to the Minister on 31 August 2011.

The Farmer Review made the following finding on page 33; *'Despite the general improvement in animal handling and transport and better understanding of welfare issues, there are some residual problems including on-farm preparation of both sheep and cattle and loading of higher-risk livestock for transport to registered premises. There is evidence of numbers of out-of-specifications sheep being delivered to Fremantle wharf for loading onto ships. This is the result of special inspection arrangements applying at Fremantle, in which the final individual inspection by the pre-export Australian Accredited Veterinarian (AAV) is conducted at the wharf. This departs from ASEL requirements and adds significant pressure to the loading process.'* Mr Farmer recommended that the inspection arrangements at Fremantle should be looked at.

Farmer Review (Recommendation 4) - The Review recommends that the current inspection regime prior to export from Fremantle be reviewed, to ensure that thorough individual animal inspection by the AAV is conducted.

The Government agreed or agreed-in-principle to all 14 recommendations of the Farmer review on 21 October 2012 as part of its announcement of changes to the livestock export trade.

Governance and scope of the Review (Terms of Reference)

The terms of reference for the review outline the scope and governance arrangements. The terms of reference are at Appendix 1.

A steering committee, supported by a secretariat from within DAFF, was established under the DAFF Livestock Export Reform Program Implementation Board to oversee the review of export inspection arrangements at the port of Fremantle. The steering committee (pictured on page 7) was chaired by the Chief Veterinary Officer, Dr Mark Schipp and includes representatives from the Australian Live Exporters Council (ALEC), RSPCA Australia, the Australian Veterinary Association, and the Department of Agriculture and Food Western Australia. This report will be provided to the Livestock Export Reform Program Implementation Board for consideration.



Members of the Fremantle Review Steering Committee (from right to left)

- Chair – Dr Mark Schipp - Chief Veterinary Officer
- Dr Ray Batey – Australian Veterinary Association
- Dr Bidia Jones– RSPCA Australia
- Mr Colin Hyde – Department of Agriculture and Food, Western Australia
- Mr John Edwards – Australian Livestock Exporters’ Council
- Acting Chair, Mr Simon Smalley – Assistant Secretary, Animal Welfare Branch DAFF (not pictured)

The committee reviewed the current inspection regime prior to export from Fremantle and have made recommendations to address the requirements of the *Export Control (Animals) Order 2004*, ASEL, and with Recommendation 4 of the Farmer review. The committee undertook broad consultation, targeted stakeholder meetings, reviewed inspection and mortality data and attended site visits to produce this report on the current inspection regime for livestock prior to export from Fremantle port.

The review took into account:

- current livestock export regulation including the Australian Standards for the Export of Livestock Version 2.3
- the respective roles and responsibilities of government, including Commonwealth and state and territory governments
- the respective roles and responsibilities in the inspection process of authorised officers and AAVs; and
- the views of government, industry and animal welfare organisations.

Farmer Recommendation 4, on which this review is based, outlined a review of the inspection processes for livestock prior to export from Fremantle port. The steering committee has completed this assessment and made recommendations that will contribute to the review of the ASEL.

The review was originally scheduled to finish at the end of October 2012; however the steering committee was unable to undertake a site visit to Adelaide or Portland during this time. Due to the steering committee’s interest in including a site visit to an eastern port to be able to compare with Fremantle, the process was extended to 21 December 2012.

Legislation Requirements

The individual inspection of animals is conducted to identify animals unfit for transport and unfit for export: in terms of regulation, this must satisfy a number of regulatory requirements of ASEL and the *Export Control (Animal) Orders 2004*.

- ASEL Standard 1 requires that animals sourced for export meet relevant animal health requirements (S1.1), importing country requirements (S1.2), and be identified individually or to the property of source (S1.3), and meet a range of specific criteria depending on the particular consignment (various standards and appendices).
- ASEL Standard 2 (Preliminary) requires that Exporters of livestock must ensure that livestock selected are fit to travel are presented for loading for land transport (2.3 8b). S2.11 requires that *'livestock must be **inspected** prior to loading and any animal showing signs consistent with the rejection criteria or any other condition that could cause the animal's health and welfare to decline during transport or export preparation, must not be transported'*.
- ASEL Standard 3 requires that livestock arriving at the registered premises are *'individually **inspected** at unloading to determine whether they are suitable for preparation for export'* (S3.12b). Rejection criteria for each species are detailed in ASEL Table 3.1.2. The Preliminary advice to this standard also states that livestock leaving the registered premises/loaded for transport to the port must be fit for the export voyage and meet importing country requirements (S3.2.3 and S3.4.2).
- ASEL Standard 4 requires the livestock to be *'**inspected** for health and welfare and fitness to travel immediately before they are loaded onto the vessel'*.

Thus there are four stages in the export process where ASEL stipulates that animals must be inspected. These are:

1. prior to loading for land transport at the source farm or saleyard
2. at unloading into the registered premises
3. prior to loading for land transport to the port; and
4. immediately before they are loaded onto the vessel

ASEL does not specify who should carry out these inspections (for example, an AAV or competent stockperson) but it is clear that it is the responsibility of the exporter to ensure that these inspections occur.

The *Export Control (Animal) Orders 2004* Division 2.5 sets out requirements for the inspection of livestock before export, however this Division refers to inspection by a DAFF authorised officer, rather than by the exporter or AAV. The orders require that the exporter must arrange for an authorised officer to inspect the livestock prior to granting permission for the livestock to leave the registered premises.

- Section 2.53(2) (a) requires that, before issuing a health certificate for livestock, a DAFF authorised officer *'must inspect the livestock before they leave the registered premises'*. This is separate from the requirement for the exporter to conduct inspections.
- Section 2.54(3)(g) requires that for permission to leave for loading from the registered premises to be granted, a DAFF authorised officer must be satisfied that *'each of the livestock is fit to undertake the proposed export voyage without any significant impairment of its health'*.
- The amendment in the Order under Section 2.54(3B) allows *'an authorised officer may be satisfied livestock are fit to undertake a proposed export voyage without needing to be assured of the fitness of every animal in a herd'*.

Current arrangements are that a DAFF authorised officer conducts a general 'flock' inspection of the consignment at the registered premises. This involves assessing the health of animals while in their normal housing in the registered premises. It does not normally involve drafting animals out of their paddocks/sheds and does not constitute an individual inspection of livestock.

The Inspection Process

An AEP is provided by DAFF to the AAVs for each approved export consignment under section 2.47 of the *Export Control (Animals) Order 2004*. Please refer to the Flow Chart of the Complete Export Process at Appendix 2.

Activity	Date(s)
<i>AAVs to examine sheep at the registered premises to confirm identified to the property of origin and only those sheep free from the symptoms listed in the sheep rejection criteria qualify for export.</i>	<i>Within 48 hours of export</i>

The AAVs must provide a declaration that the activities have been completed as part of the exporter's application for a health certificate and permission to leave for loading.

Activity	Date(s)
<i>AAVs to directly supervise individual examination of sheep -only those sheep free from external parasites, clinical evidence of clostridia diseases, disease of an infectious or contagious nature and fit to travel qualify for export.</i>	<i>On the day of export</i>

The AAVs must provide a declaration that the activities have been completed as part of the exporter's application for an export permit.

The reader's guide to the *Export Control (Animals) Order 2004* provides a summary of the administrative steps in the process of an export of animals by sea as follows:

- the exporter gives the Secretary a notice of intention to export (NOI), a consignment risk management plan (CRMP) and (if required) an exporter supply chain assurance system (ESCAS) for the proposed export
- the Secretary approves the NOI, CRMP and (if required) ESCAS
- the exporter sources the livestock
- the livestock are treated and tested in accordance with the Australian Standards for the Export of livestock and the importing country's requirements
- the livestock are held in pre-export quarantine or isolation at registered premises in the way that, and for as long as, the importing country requires
- before, during or after treatment and testing, the livestock are assembled at registered premises (for how premises are registered, see Division 2.2 of the Order)
- after the livestock are assembled at the registered premises, and before they leave, the exporter arranges for them to be inspected by an AQIS authorised officer (a health certificate is prepared for them, if required by the importing country, at this stage, but is not issued until an export permit is issued)
- an DAFF officer then issues a permission to leave for loading, which authorises the exporter to take the livestock from the registered premises and load them on board a ship or aircraft for export
- the livestock is loaded in accordance with the approved travel and loading plan, with the health certificate and an export permit approved by DAFF.

The principle elements of risk which are being addressed by inspection or examination of livestock at various stages of the chain include:

1. detection and appropriate management or treatment of animals with compromised health or welfare,
2. detection and timely removal of animals with conditions likely to affect the subsequent health or welfare of other animals in a consignment
3. detection and removal of animals which are otherwise unfit for export, including those likely to be rejected at unloading of a vessel

The principle purpose of the individual inspection in a consignment is to detect unfit animals and therefore reduce the risk of these animals being loaded onto a ship for export. Strategies for managing this risk should be designed to maximise the likelihood that:

- a. Animals with compromised health or welfare will be detected early and managed or treated appropriately (i.e provided with veterinary treatment or euthanised in a timely manner).
- b. Animals affected by disease or conditions likely to affect the subsequent health or welfare of other animals in a consignment will be detected and removed in a timely manner (i.e. as soon as possible to reduce the spread of infectious disease).
- c. Animals which are otherwise unfit for export (i.e. do not meet ASEL or importing country requirements or are at risk of being rejected at unloading) will be identified and removed.

In order for an inspection to be considered an 'individual inspection', livestock must be presented to inspector(s) so there is the opportunity to view every animal. Assessing the health and welfare of animals in a group, such as in a pen or paddock, is an essential part of routine monitoring and can be used in conjunction with but cannot substitute for individual inspection.

Description of inspection processes in each state

The current AAV inspection regime for animal consignments differs between Adelaide/Portland and Fremantle. The approved export programs issued for sheep consignments have different AAV inspection requirements depending on the port of departure. These requirements are part of the approval of the Notice of Intention / Consignment Risk Management Plan.

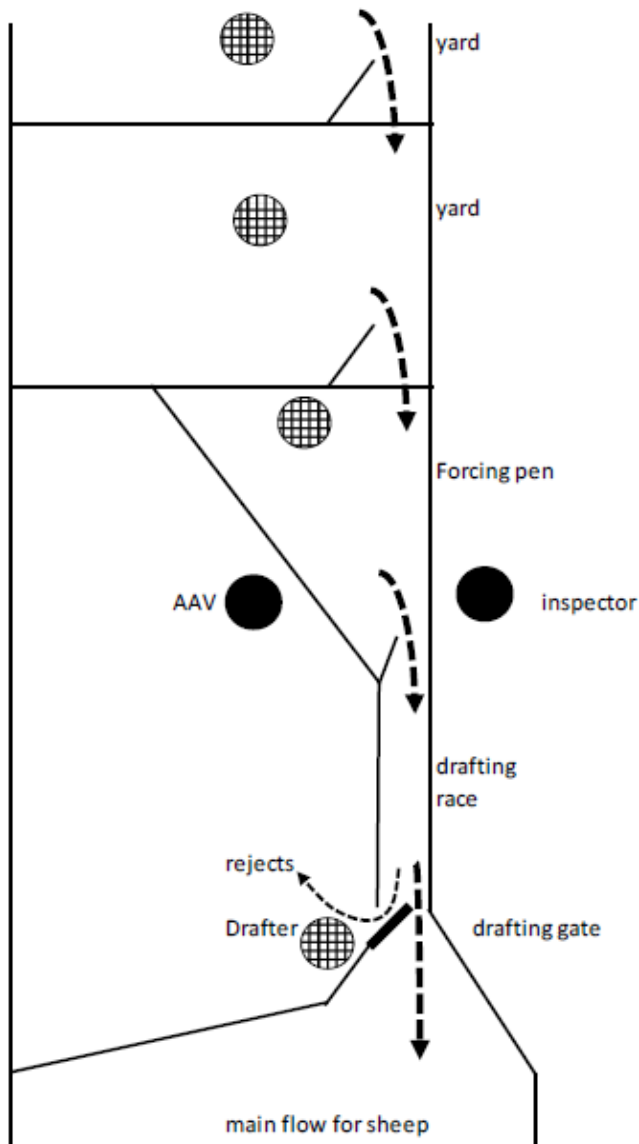
When animals arrive at any registered premises they are drafted into lines. This process has the ability to remove reject animals but this is not a primary focus of the drafting carried out at unloading. All registered premises also carry out flock inspections by an AAV but this is generally not used to remove individual animals. The main focus is to assess of the overall flock health.



Caption: Pre loading inspection at the registered premises in Western Australia

Adelaide & Portland

The main individual animal inspection at Portland and Adelaide is conducted at the registered premises.



The animals pass through a series of forcing pens and rejects are marked and removed through a final drafting race at the last pen. The animals run through at ground level and enter the race after they pass the AAV (Figure 1).

When animals reach the port at Portland or Adelaide they run off the trucks and into a large pen at ground level. There will be an AAV and often several stock handlers in the pen. Animals identified as unfit for export are physically removed by the AAV or stock handlers. A stock handler will then drive the sheep onto a ramp and into the ship (Figure 2). At both the registered premises inspection and the wharf inspection the AAV will not have a good view of the underside of each animal.

At both the registered premises and the wharf poor weather and/or lighting can affect the ability of the AAV to adequately assess each animal as there is little cover or artificial light.

Figure 1 – Diagram (not to scale) of the individual animal inspection equipment at the registered premises in Adelaide and Portland. From MLA report W LIV 0171.

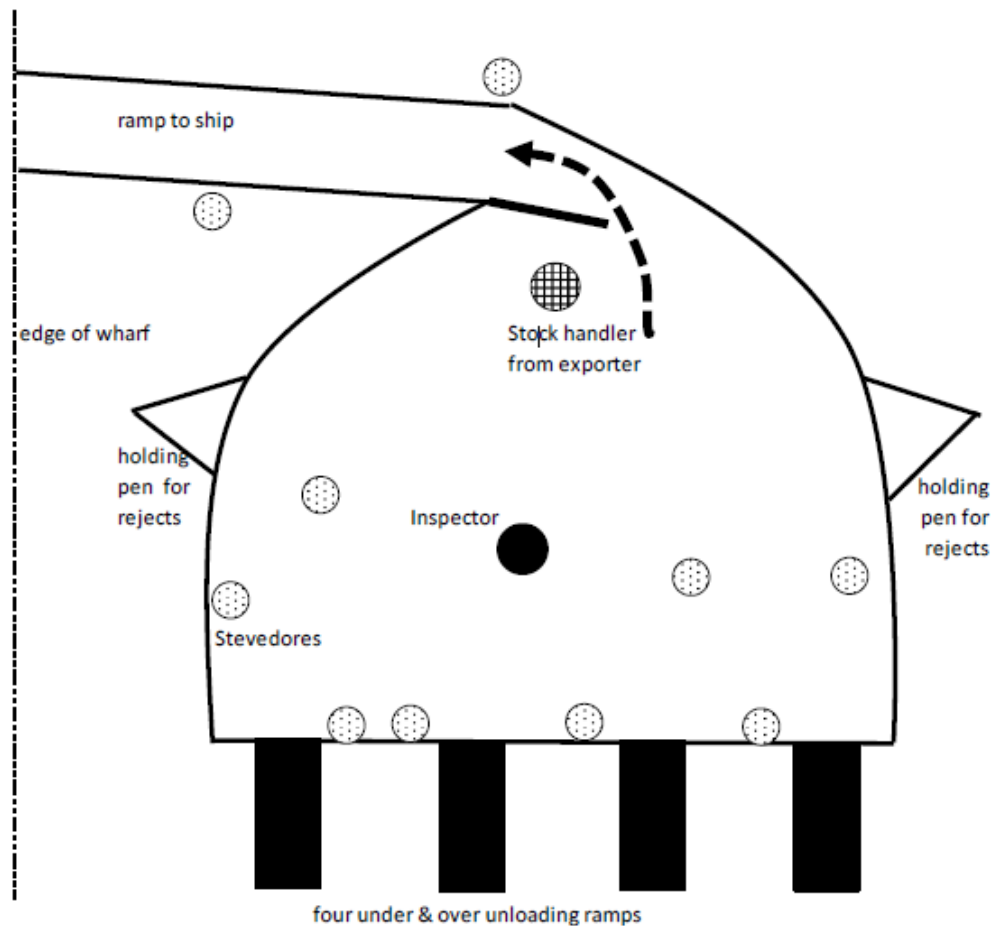


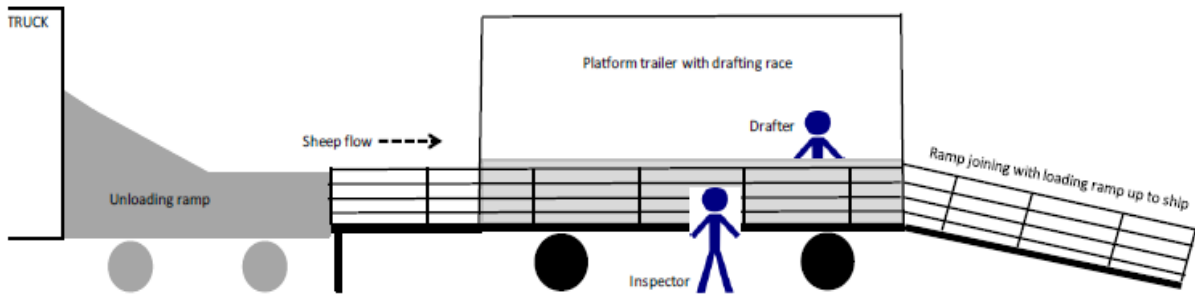
Figure 2 – Diagram (not to scale) of animal loading facilities at the Adelaide wharf. The Portland wharf setup has a similar design. From MLA report W LIV 0171.

Fremantle

The main individual animal inspection at Fremantle is carried out at the port using one of two main systems. The first involves animals being loaded from trucks into a large pen at ground level. This inspection process is similar to that used in Portland and Adelaide.

Under the second approach, when the animals reach the wharf they run directly off the truck onto a raised platform. A drafter is placed alongside the race and can draft reject sheep off into a reject pen. The AAV stands at ground level and has a good view of one side of the animal (provided that the weather and lighting allows the AAV to see the animal clearly). Animals then run down to ground level before running up onto the ship. (Figures 3 and 4)

Figure 3: Lateral diagram (not to scale) of the raised inspection platform used to inspect sheep at Fremantle port. From MLA report W LIV 0171.



Caption: individual inspection at Fremantle wharf using an elevated race

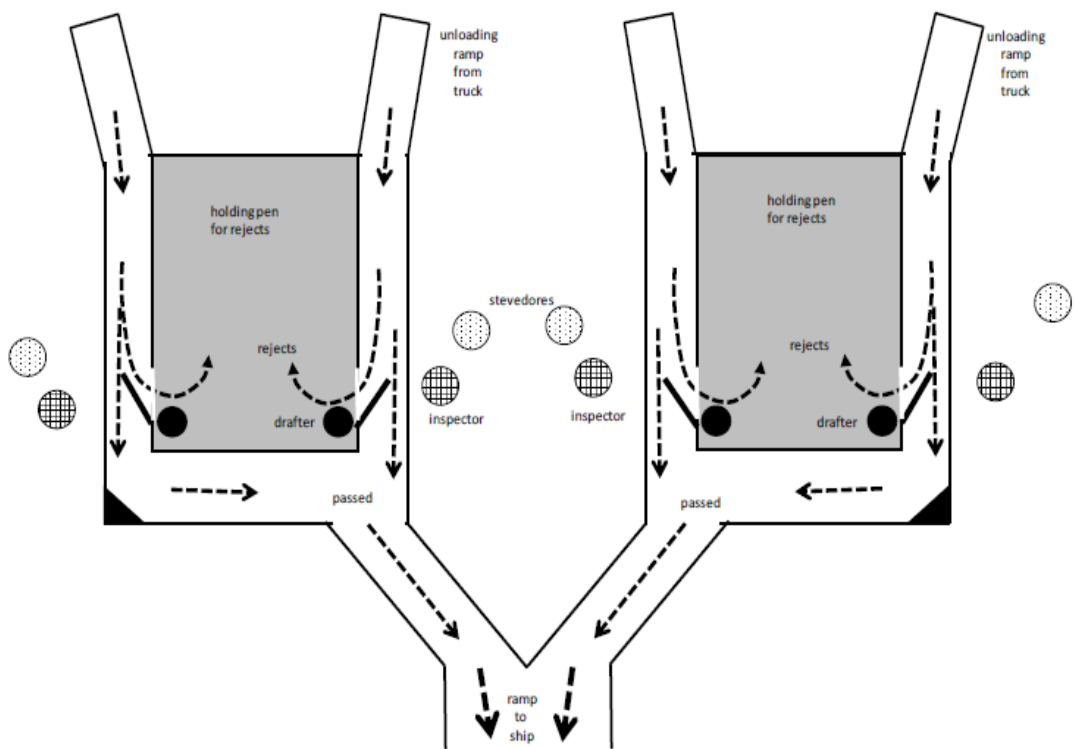


Figure 4: Aerial diagram of the individual inspection system for sheep at Fremantle port. From MLA report W LIV 0171.



When cattle are loaded at Fremantle they are run through an individual race with the AAV standing next to the race. The AAV acts as the drafter to remove unfit animals. Stock handlers observe the animals as they run onto the ship but there are no facilities to remove reject animals once they have gone past the AAV.

Part 2 – Undertaking the review

Information provided to the committee

On commencement of the review, steering committee members were provided with the following information:

- Inspection regimes prior to export of livestock from Fremantle port terms of reference
- Australian Standards for the Export of Livestock - version 2.3 April 2011
- Independent Review of Australia's Livestock Export Trade- also known as 'the Farmer Review'
- Industry government working group on live sheep and goat exports final report to Australian Government 26 August 2011
- OIE Standards for slaughter, transport by Air, transport of Animals by Land and transport of Animals by Sea
- Relevant media releases
 - Gillard Government reforms live export trade 21 October 2011
 - Government to review the Australian Standards for Livestock Export 24 July 2012
 - Government response to Senate Inquiry into animal welfare standards in live export markets – 10 July 2012
- Export legislation
 - *Export Control (Animals) Amendment Order 2012 (No. 1)*
 - *Export Control (Animals) Order 2004*
 - *Export Control Act 1982*
 - *Export Control (Orders) Regulation 1982*

During the process of the review, the steering committee requested, or were provided with, additional information including:

- The full submissions to the ASEL and LESAG, and Fremantle reviews (excluding identifying information where requested by the contributor)
- An Animals' Angels report on the Ocean Drover 24-25 September 2012.
- A Comparison of Inspection Outcomes for sheep Exported from Southern Ports (Report prepared by DAFF).
- Examples of a contingency plan for escaped animals and welfare monitoring checklist guide.
- A summary report of DAFF Mortality Investigation reports.
- Updated Industry Funded research recommendations from September 2012.
- W LIV 0171 – review of sheep Pre-Embarkation Inspection Procedures.
- Examples of the Consignment Risk Management Plan and Exporter Supply Chain Assurance System (Report prepared by exporters)
- Examples of pre-export inspection documentation

Submissions

The Chair requested targeted submissions from key stakeholder representative groups on 8 August 2012. These groups included exporters, producer groups, State and Territory governments, animal welfare groups, researchers, and AAVs. Submissions to the reviews closed on 7 September 2012. The request sought input to both the Fremantle review and the review of the ASEL and Livestock Export Standards Advisory Group. Thirty three submissions were received from industry groups (2), government agencies (7), other organisations (11), animal welfare groups (6) and individuals (7) including AAVs. The majority of these submissions discussed the ASEL and live animal exports more generally.

Five of the submissions received made specific comments and recommendations on individual animal inspection procedures; these submissions are from LiveCorp/Meat and Livestock Australia, Animals' Angels, Vets Against Live Export, an individual member of the public and a submission from an AAV. All but the submission by LiveCorp/Meat and Livestock Australia, were not in favour of the main inspection at the Fremantle port taking place at the wharf due to the unnecessary transport of sick or out-of-specification animals to the wharf and on the return journey to the registered premises. The recommendations also raised concerns with the relationship that the AAVs have with the exporters and a lack of experience of some handlers.

The submission by the AAV in particular recommended that the inspection be conducted in a double sided inspection race with drafting facilities, and that rejects be removed and marked. It was suggested that this inspection should be carried out at the registered premises by independent trained inspectors in all states. The AAV also recommended that the inspection system is slowed down and regulated more closely.

The major recommendations from the submission by LiveCorp/Meat and Livestock Australia included that each port be analysed and treated separately due to different characteristics in climate, location and variations further back in the supply chain (e.g. on farm management). The submission also pointed to the advice in the MLA report *Review of sheep pre-embarkation inspection procedures; W LIV 0171*, which is favourable to not having two inspection processes close together (at the registered premises and the port) and in favour of the Fremantle inspection equipment and process of having the final inspection at the port.

Desktop analysis

As part of the review DAFF undertook a desktop study titled Comparison of Rejection Rate and Shipboard Mortality for Sheep Exported from Southern Australian Ports, the report is included at Appendix 3. The report compared the rejection rates and shipboard mortalities for sheep exported to the Middle East or via the Suez Canal from the Southern Australian ports of Portland, Adelaide and Fremantle. The data used in this analysis was collected from inspection rejection reports provided by AAVs to the DAFF regional office for each livestock consignment number (LNC) and information from the Live Animal Export (LAE) database from the period of January 2010 to December 2011.

In reviewing this data, the committee took account of:

- Uncertainty around the reliability of the data, including whether comparisons between that collected from consignments from Fremantle and those from other ports were valid, there being major discrepancies identified, and
- There being substantial differences between the way animals are managed at registered premises in Western Australia and those in eastern Australia.

During the period, the majority of sheep were exported out of Fremantle, and advice to the committee suggested that this arrangement will continue. The data indicated shipboard mortality rates were significantly higher out of Portland and Adelaide but there was no statistically significant association with rejection rates for each Australian port. Data from voyages out of Fremantle would suggest that differences between sheep groups in health and preparation, is the major contributor to shipboard mortalities.

The data also appears to suggest that rejection rates at Fremantle may be substantially lower than for sheep loaded at other ports, with the majority of rejections at the wharf (where the final individual animal inspection is performed in Fremantle). However, the committee considered that this data could not be relied upon as a basis for determining the appropriateness of the Fremantle inspection system.

It was noted from the data that the reasons for rejection were similar for Portland and Adelaide where diarrhoea (scouring) accounted for approximately 40% of rejections but scabby mouth was a relatively minor component. In contrast, rejections at Fremantle were dominated by eye conditions and scabby mouth, while scouring was not significant. Although this may reflect different frequencies of disease conditions, it should be considered that this may arise from the ability for animals to be withdrawn from the export chain on multiple occasions during preparation at the registered premises in Fremantle, thereby changing the final frequency of the different reasons for rejection. This suggests that it may be feasible to strengthen the process for progressively removing animals, to reduce the total number of rejects at final inspection in Fremantle. This finding is also consistent with an opinion expressed to the committee that inspection on the raised platform enables early lesions of scabby mouth and pinkeye to be more readily detected and animals removed.

Site Visits

The Fremantle Export Inspection Review steering committee and secretariat visited Fremantle port from 17 to 21 September 2012, to view the inspection process for cattle prior to export. The committee also visited registered premises to view the housing of sheep prior to loading for transport to the wharf. Consultation meetings were also held with exporters, producers, animal welfare groups and AAVs during this visit.

Two members of the steering committee were able to view the loading of sheep at Adelaide port on 24 September 2012. Committee members were unable to view the registered premises inspection procedures during the visit, which is the main individual inspection point in the Adelaide export chain due to loading timeframes.

The steering committee and secretariat then viewed the registered premises and wharf inspection processes in Fremantle on 25 September 2012. The chair was unavailable for this site visit and an acting chair was appointed. This time, the committee was able to view the inspection process of sheep from the registered premises to the wharf. This enabled the committee to gain a good perspective of the inspection process and preparation of sheep for export in Fremantle.



Caption: Elevated pens at the registered premises in Western Australia

Stakeholder Meetings

During the first site visit to Fremantle port, the steering committee met with key stakeholder representatives from 19 to 21 September 2012. During the stakeholder meetings, issues were highlighted to the committee from each organisation about the trade. The committee were able to explore the role that each organisation plays in the live animal export chain and issues that they face. The committee met with the following stakeholders:

- Fremantle City Council
- Western Australian Farmers Federation
- Pastoralists and Graziers Association of Western Australia
- Western Australian Live Exporter's Association and registered premises operators
- AAV
- Livestock and Rural Transport Association of WA
- Animals' Angels
- RSPCA Western Australia

Part 3 - Findings and Recommendations

Issue 1 - Roles and Responsibilities

Different people have different roles and responsibilities for the animal along the live export chain. Who is accountable for the animal at each stage is not entirely clear despite the description provided in Section 6 (page 13 - 15) of the Australian Position Statement on the Export of Livestock; part of the ASEL explains the responsibility of:

- the exporter,
- the government,
- livestock organisations,
- accredited stockpersons,
- exporter designated animal welfare officer on the wharf
- AAVs and
- The live export chain service providers.

The committee noted that there are those who have primary responsibility such as those above; those who act as employees or contractors, and those who work under direction or supervision, particularly of the AAVs. These roles require adequate definition.

The committee did not form a view on whether all inspectors should be AAVs or whether a combination of AAVs and competent stock people was acceptable, however it did agree that:

- the individual inspection process must be conducted under the direct supervision of an AAV
- all those involved in routine monitoring, group and individual inspections must be trained and competent to assess livestock against the relevant rejection criteria for the consignment.
- animals identified as rejects during routine monitoring, group and individual inspections should be marked as soon as they are identified and removed as soon as possible from the group.

Recommendation 1 – Roles and Responsibilities

Finding

The roles and responsibilities of people along the live export chain needs to be clear and transparent to all parties involved in the trade.

Recommendation 1 (to the ASEL Steering Committee)

Identify the roles and responsibilities of all parties who interact with the animals throughout the live export chain.

This recommendation links to all six standards of the ASEL.

Issue 2 - Competencies and Training

The committee found that many different people handle livestock at different stages throughout the live animal export chain. This starts from when the animals are sourced from farms or saleyards through to loading the animals on the wharf. People involved in this process include truck drivers, stockpersons, registered premises managers, AAVs and animal welfare officers. Each person brings different background experiences, and has a different set of skills, yet each role requires a specific set of competencies and carries responsibilities. The committee found that the responsibilities are not

adequately defined. The committee encountered a number of situations where animal welfare could have been improved if those responsible for the care of livestock had been better trained or more competent at identifying animals that required immediate euthanasia or treatment.

For example, during a site visit to a registered premises the committee observed reject sheep, which had been drafted out of a consignment as they were unloaded days before. These sheep were being held in a separate reject pen until the registered premises were emptied out. It was clear that several animals were injured and required emergency euthanasia (which was immediately actioned). The committee affirms that the process of removing unfit animals whether for inspection or otherwise, must ensure that compromised animals are identified and treated in an appropriate and timely manner.

The committee recommends that the training and competencies required at each stage for each specific task along the chain be identified. This would ensure staff are adequately trained for ensuring the best animal welfare practices are implemented along the process.

Recommendation 2- Competencies and Training

Finding

The review has found that a range of people support the AQIS Accredited Veterinarians (AAVs) during the inspection process and along the live export chain. Some of these roles have defined competencies while others have not. (Refer to Appendix 5). The committee agreed there is a need to clarify the competencies required for these roles and ensure that individuals placed in such roles have an understanding of their responsibilities and are competent to perform their duties.

Recommendation 2 (to the ASEL Steering Committee)

Identify in ASEL the competencies required for all people who interact with the animals throughout the live export chain from sourcing to loading.

- **Ensure that individuals placed in such roles have an understanding of their responsibilities and are competent to perform their duties.**

This recommendation links to all six standards of the ASEL and to the Export Control (Animals) Order 2004

Issue 3 - Record Keeping and Data Collection

The committee found that the detail, consistency and utilisation, of the existing records relevant to the inspection of animals such as those from registered premises operators, AAVs and truck operators is inadequate for proper management of animal health and welfare or to investigate adverse events.

Current requirements for record keeping relating to livestock inspections and the treatment of rejected animals are as follows:

ASEL S3.16, which refers to daily monitoring of health, welfare and mortality at the registered premises, requires that records of each consignment must be kept for at least 2 years after the date of export, but does not specify what information these records should contain.

ASEL S3.17 requires that a record must be kept of the identity, method of treatment or euthanasia and disposal of all rejection animals identified at unloading (i.e. during intake).

Section 4A.14 of the *Export Control (Animals) Order 2004* requires that AAVs must keep certain records, including details of veterinary examinations, treatment, testing or pre-export quarantine or isolation of livestock.

The committee identified that there are several stages or opportunities in the assembly and preparation of livestock when animals may be identified as unfit for export and marked or removed from the consignment. These are during unloading at the registered premises; during daily routine monitoring at the registered premises (S3.16), during the AAV flock inspection; during the AQIS flock inspection; during drafting out of the registered premises; and during loading at the wharf. The current requirements do not require information on animals rejected at each of these stages to be recorded in a consistent manner. For example, AAV records only cover those stages of the preparation process where the AAV or staff under their supervision is present – this is not the case during unloading or daily monitoring.

Samples of current documents provided to DAFF by AAVs during auditing are included at Appendix 4. The committee found that the information supplied by the AAV is often not specific (e.g. the number of reject animals might be expressed as percentage of the consignment rather than an actual number, or information on individual animals or treatments was not provided) and does not reflect the level of detail specified in Section 4A.14. In addition, the auditing process does not cover the rejection of livestock outside of AAV inspections, i.e. records kept of rejections when animals are received at the registered premises may not be included in the AAV's report.

The steering committee discussed the importance of clear record keeping during livestock assembly and preparation. Keeping accurate records was seen to serve three purposes: fulfilling the licence requirements of practicing AAVs, as a quality assurance measure for the exporter which can be accessed by DAFF, and as a means of informing those with responsibility for the subsequent health and welfare of the consignment.

The committee was provided with a report comparing data from inspection reports provided by AAVs over a two-year period from January 2010 to December 2011 on the numbers of rejected sheep at the registered premises and the wharf for the three ports visited in this review (see Appendix 3). However, it became apparent over the course of the committee's activities that these data were not necessarily an accurate reflection of the overall numbers of animals rejected as they only covered rejections known to the AAV. Where animals had been rejected prior to the AAV inspecting the consignment (such as during unloading of animals at the registered premises or routine monitoring) they would not have been included in these data. In particular, the committee noted that the figure provided for sheep rejected at the registered premises in Fremantle over the two-year period was improbably low (576 sheep or 0.01% of exported animals) and did not even represent the estimated average number of sheep rejected when receiving a single consignment.

A report was provided to the committee from the MLA/Livecorp Live Export Program that compared the inspection arrangements at Fremantle with those at Adelaide and Portland, citing previous data and reporting on the inspection processes during four consignments. The report does not include any new data for rejected animals, but concludes that the current arrangements at Fremantle are superior to those at Adelaide and Portland. The report provided some helpful background and diagrams of the various inspection regimes, and provided an indication to the committee that there is strong support within industry for the Fremantle system. This support was also affirmed during hearings with industry and AAV representatives, who informed the committee that a single trial of raised inspection

at the premises had been undertaken, which coincided with the visit of Mr Farmer, and that this had not been successful in removing many animals unfit for export.

The committee found that accurate information on the number and type of rejections that occur at each stage of the livestock assembly process is essential in order to be able to assess the capacity of an inspection process to identify and remove unfit animals.

Recommendation 3- Record Keeping and Data Collection

Finding

Some records are required under ASEL; however they are not readily available or useful to support the inspection process or allow proper assessment of the capacity of current inspection arrangements to identify and remove reject animals. The lack of accurate record keeping and data detailing rejections has limited the work of the committee. The type of information recorded on rejects at the registered premises and the wharf should be standardised. There is a need to clearly articulate what record keeping must be done throughout the different stages of the inspection process and who should have access to the records, including those who are responsible for subsequent health and welfare of the animals.

The ship/shipboard AAV needs to know of any potential animal health and welfare risk encountered during consignment preparation so as to allow for provisioning with treatments that may be required during the voyage.

Recommendation 3 (to the ASEL Steering Committee)

Outline in the ASEL what record keeping must be done throughout the different stages of the inspection process starting from receipt of the animals at the registered premises, how often, who keeps the information and who it must be made available to when required. In particular:

- **DAFF to develop templates to support the record keeping requirements for AAVs as stated in *Export Control (Animal) Orders 2004* part 4A 14**
- **The requirement for record keeping of rejection at unloading set out in ASEL S3.17 to be expanded to cover animals rejected at all stages of the assembly process**
- **A consignment report summarising animal health issues, reasons for rejections, adverse events and treatments, and should be provided to DAFF and the onboard AAV prior to issuing the export permit.**

This recommendation links to all six standards of the ASEL

Farmer Review Recommendation 3

A quality assurance system should aim to improve the health, welfare and suitability of animals at every point up to the loading of the vessel. The present system of preparation of animals for export relies upon end point inspection immediately prior to loading. If the preparation of animals is seen as a process, during which there are many opportunities to remove unsuitable animals, the committee would expect to see better outcomes. Approved Arrangements could be made available to proven exporters who demonstrate a responsible approach to reduce the regulatory burden.

Finding

It was identified that there were inconsistencies in record keeping and auditing along the live export chain including an understanding of who is responsible at each point. The findings of the review committee are aligned with those of Mr Farmer at Recommendation 3 in the Farmer Review Report.

The committee reaffirms Recommendation 3 of Farmer Review, acknowledges that industry has commenced this work and believes that this should be given priority.

Farmer Recommendation 3 states:

The Review recommends that in line with ASEL, that industry develop and implement a through-chain QA system to complement government regulatory compliance programs.

Issue 4 - Welfare compliance monitoring

There is a lack of consistency between the states in terms of the capacity of officers authorised under State/Territory animal welfare legislation to monitor compliance with that legislation. This capacity is limited by resources, geography and right of access by animal welfare inspectors to registered premises and the wharf.

The steering committee noted that inspectors under the *Animal Welfare Act 2002* in Western Australia (both government and animal welfare groups) do not have the right to conduct unannounced inspections to ensure compliance with state legislation at the registered premises and the wharf. However, under the present arrangements, the Western Australian Government has agreements with registered premises operators to allow access by Authorised DAFWA inspectors and has not previously been refused entry under these agreements. However, these agreements have no legal force and do not cover other Animal Welfare Act enforcement officers.

Under Victorian legislation, animal welfare monitoring of livestock is the responsibility of Department of Primary Industry officers. The committee noted that in Portland, no-one with the capacity to enforce this legislation was present at either the registered premises or the wharf. A conversation with the DAFF regional officer indicated that DPI officers had not visited the registered premises or wharf at any time during his inspections of livestock over several years.

The committee affirmed that State authorities who are responsible for animal welfare legislation should have free access to all aspects of the supply chain within their jurisdiction.

While this principle of free access is important, it is acknowledged that State animal welfare regulators are limited in their capacity and geographical location to be able to monitor live export related activities. As the nature of the trade is such that export events from most ports are sporadic, they may also not be aware of the assembly and preparation of animals for export.

Animal welfare compliance would be enhanced if there was greater communication and liaison between DAFF and relevant State animal welfare agencies. Two aspects that should be further explored are the development of MOUs between DAFF and relevant State agencies and the potential for cross-jurisdictional appointment of inspectors/officers. The Farmer Review noted a “special arrangement” in Queensland where a State inspector was “delegated authority from AQIS for some functions.” This option should be explored further. In addition, relevant State agencies should consider delegating certain functions under State welfare law to DAFF officers. The Farmer Review found that “a [DAFF] officer’s ability to take immediate action on breaches of State or Territory welfare legislation appears to be limited to negotiating with a responsible person (exporter, premises operator, AAV, stockperson)”. Delegating State powers to DAFF officers would allow DAFF officers to more effectively address the immediate welfare needs of affected animals and take further regulatory action where appropriate. Cross-jurisdictional appointment/delegation would enhance the available enforcement options.

Recommendation 4 - Welfare compliance monitoring

Finding

In most jurisdictions, State and Territory regulators are currently restricted to conducting inspections/audits based on approval from the exporter. The committee supports a monitoring process that provides assurances that animal welfare standards are being met and found that the opportunities for unhindered access will support these assurances and will complement the overall inspection process.

Recommendation 4 (to State and Territory Governments)

Animal welfare inspectors who are responsible for the welfare of livestock should have free access throughout the live animal export chain up to and including the point of loading, to ensure compliance with state and territory Animal Welfare Acts.

This recommendation links to ASEL Standards 1 to 4

The committee noted that the above recommendation could be achieved by establishing formal lines of communication and liaison between DAFF and relevant state and territory animal welfare agencies. In particular, the committee encourages DAFF to consider the development of MOUs between DAFF and relevant State agencies and the potential for cross-jurisdictional appointment of inspectors/officers to monitor compliance with animal welfare legislation.

Issue 5 - Individual Animal Inspection Process

The Australian Standards for the Export of Livestock (ASEL) stipulate that animals must be inspected at four stages in the export chain.

1. prior to loading for land transport at the source farm or saleyard
2. at unloading into the registered premises
3. prior to loading for land transport to the port; and
4. immediately before they are loaded onto the vessel

However, there is limited guidance on how the inspection process should be conducted, and which of these inspections should be individual inspections. The committee observed variation in processes between

Adelaide, Fremantle and Portland reflects this lack of guidance. Although the current arrangements have a range of procedures in place, information received by the committee, including submissions

from AAVs and the original comments in the Farmer Review, indicated that there are still animals reaching the wharf and being loaded onto vessels that are unfit for export.

The site visits undertaken by the committee provided a number of opportunities to assess the current facilities and arrangements for the individual inspection of animals against the ASEL rejection criteria listed in Standard 3 Table A3.1.2. Arrangements varied in how individual inspections were carried out, where they were carried out, and the type of person conducting the inspection. While the committee was unable to view the inspection arrangements at both the wharf and registered premises at every port, members of the committee were able to reach agreement on the components of risk that contribute to the outcome of inspection methods and on strategies to manage that risk.

The committee considers that an assessment of individual animals should be carried out at critical control points along the system of preparing animals for export to prevent animals unfit for export from being unnecessarily transported, where there is a high risk that the status of livestock has changed since the last individual inspection and where animals are already being drafted for the purpose of loading or unloading.

There are four main points in the export process where these conditions may apply:

- At the point where animals are sourced for export (farm or saleyard)
- On arrival at the registered premises
- Prior to leaving the registered premises
- Prior to loading onto the vessel

The committee considers that individual inspection of livestock at the point of sourcing is essential, but the variation in inspection facilities and lack of direct control over the inspection process means that this cannot be relied on as the principle inspection point.

In contrast, facilities at the registered premises can be specifically designed for the purpose and inspections are carried out under the direct supervision of the AAV. Requiring individual inspection on arrival at the registered premises and prior to leaving the registered premises means that the same drafting facilities can be used for both inspections. The committee considers the registered premises to be the primary point for individual inspections.

Where individual inspection has been conducted prior to leaving the registered premises, inspection processes at the wharf should be focused on removing animals injured or otherwise requiring rejection as a result of transport from the registered premises.

The committee considers that the risk of loading unfit animals is best managed by a combination of routine monitoring, group and individual inspection of animals.

The committee identified a range of factors that may affect the capacity of the individual inspection process to reliably assess each animal for fitness and against all of the ASEL rejection criteria:

- the ability to view, mark and remove animals in small pens prior to entering a race or loading ramp
- the number and density of animals in the pen(s) leading up to a race, and the consequent facility with which an individual animal may be seen and identified
- the height of the drafting race relative to the inspector
- the width of the drafting race (whether animals were forced into single file or could overlap each other)

- visibility through the sides of the race (whether it had solid or open sides)
- access to both sides of the race
- whether individual animals are observed from above and/or beneath
- the level and placement of lighting during night-time or poor visibility
- provision of shelter over the race for inspectors and livestock during inclement weather
- the speed of animals moving through the race
- the capacity of the inspector to slow or stop the flow of animals

As a result of explanations provided by various participants and/or its own observations the committee concluded that each of the individual inspection arrangements observed required improvement in one or more of these areas.

In a veterinary clinical setting with livestock, outside of the live export industry, a competent examination is not necessarily a simple, single event, and may extend over both time and place, and also requires a reliable history relevant to the animal(s), often utilising observations by non-veterinarians. Determining where and how final individual inspection by an AAV or inspector under their supervision, should be performed requires information and data which support the likelihood that animals unfit for export will be reliably detected. The lack of data has been a major obstacle to the committee making an objective, definitive recommendation. The future availability of consistent records, as recommended above should facilitate any future consideration by both AAV's and regulators.

Recommendation 5 – Individual Animal Inspection Process

Finding

The risk of loading unsuitable animals is best managed by a combination of routine monitoring, group and individual inspection of animals. Individual inspection should be carried out at critical control points along the system. To avoid the unnecessary transport of unsuitable animals, the principle point of inspection should be the registered premises. There are opportunities to further improve the inspection process to increase the likelihood that unsuitable animals will be identified and removed from the consignment.

Recommendation 5

The primary point for individual inspection should be at the registered premises and the facilities and inspection process must be designed to reliably assess each animal for fitness to travel and against all of the ASEL rejection criteria.

This recommendations links to Standard 3 of the ASEL

Issue 6 - Animals unfit for transport or export

Where livestock are detected as unfit for transport or export as a result of routine monitoring, group and individual inspection of animals, there is an obligation for these animals to be identified and managed or treated appropriately. During the site visits to registered premises the committee found that rejected animals were not always treated or managed in a timely manner and that facilities or infrastructure did not always allow the easy removal of rejected animals. Please refer to Opportunities to remove unsuitable animals from export consignments at Appendix 5.

For example, at one registered premises sheep were housed in sheds in adjoining groups of approximately 600 animals where access to the centre pens was only possible through outer pens.

Adjusting this design to reduce the pen size and include a raceway down the centre of each shed would greatly enhance the ability to remove individual animals.

At another registered premises reject sheep were retained on site without treatment for the entire preparation period rather than being removed after they have been drafted out of the consignment. The committee found that several of these sheep were unfit to load and should have been euthanised at an earlier stage.

Procedures for managing and removal of animals rejected throughout the export process are not clearly outlined in ASEL. The requirements set out in S4.8, which covers the rejection of livestock at the wharf, should apply to all situations where livestock unfit to export are detected.

Recommendation 6 – Animals unfit for transport or export¹

Finding

The way in which the inspection of livestock to be exported is undertaken varies between consignments and between load ports. The current requirement in ASEL states that ‘only fit animals that comply with these standards and importing country requirements can be transported to the port of loading for export’.

Recommendation 6 (to the ASEL Steering Committee)

The Approved Export Program should document where and how the individual inspection of livestock will be conducted including the procedures when dealing with rejects.

This recommendations links to ASEL Standards 3 and 4

¹ The Approved export program (AEP) is a program of activities to be undertaken by an AAV, for the purpose of ensuring the health and welfare of eligible live animals in the course of export activities. The activities to be undertaken may include examining, testing or treating the eligible live animals.

The AEP is issued by DAFF (Live Animal Export Program) to the exporter and the exporter must provide a copy of the AEP to the AAV.

Recommendation 7 – Animals unfit for transport or export

Recommendation 7 (to the ASEL Steering Committee)

That at each point in the supply chain, inspection procedures and facilities are in place that allows the identification and removal of unfit animals in a timely manner to ensure that animals unfit for transport or export are not transported to the next stage.

This recommendations links to all six standards in the ASEL

Part 4 – Assuring effectiveness of the recommendations and conclusions

Approved Arrangements – a process for improving compliance

One option for improving livestock exporter compliance with regulations, standards and guidelines might be to implement a system of approved arrangements as a requirement for holders of livestock export licences. Such a system is already operated by DAFF under the *Export Control (Meat and Meat Products) Orders 2005* for the export of meat. For DAFF, the regulator of Australia's meat export industry, they are the basis of compliance activities through on-plant verification and provide for integrity of certification.

This means that licensed livestock exporters would have to propose a system of quality arrangements that ensure their business operations up to the point of discharge of livestock from a vessel in an importing country meet specified animal health and animal welfare requirements. For feeder and slaughter livestock exports this means that there are document industry undertakings from the point of selecting animals on farm until the point of slaughter in the receiving country. ASEL would then link up with ESCAS. Once approved by the Delegate such arrangements (approved arrangements) would become legally binding and sanctions on the exporter's licence could apply for demonstrated breaches.

In the DAFF export meat program processors are directed to base their proposed arrangements on DAFF's Approved Arrangement Guidelines. For national consistency DAFF would need to develop a similar document for the livestock export industry. The guideline needs to specify the animal welfare outcomes and how it is generally acceptable to meet them. It would then be up to each holder of an export licence to gain approval for arrangements that meet these specifications.

A proposed approved arrangement for livestock exports would need to demonstrate that the objectives of the *Export Control (Animal) Orders 2004* and the Australian Standards for the Export of Livestock, including compliance with state and territory animal welfare laws, will reliably be met to ensure that livestock intended for export:

- are fit and healthy
- meet Australian legislative requirements, and
- meet the importing country requirements.

Livestock export approved arrangements would specify the factors to be considered by industry in the documentation of management practices, livestock preparation and inspection operations and export certification processes. The arrangements would also include Standard Operating Procedures and Work Instructions for staff in the various stages of the export chain.

Compliance arrangements could include verification of the new system of approved arrangements rather than remain solely reliant on exporter documentation. The arrangements would therefore support an inspection and certification system that would reliably meet the requirements of all stakeholders including the industry itself, government, customers, producers and Australia's trading partners.

Legislation and Standards

The Farmer review recommended that a comprehensive review of ASEL be undertaken. The government accepted this recommendation and is undertaking a review of the ASEL and LESAG. However, this committee found that there are also opportunities to improve the *Export Control (Animal) Orders 2004* as there are a number of inconsistencies and gaps.

Conclusion

The committee considered that the live animal export inspection process has opportunities to improve to reduce the risk of injured, sick or animals 'unfit for export' from progressing through the live export chain.

In order to reduce the risk of allowing unfit animals to remain in the live-export chain, it is considered imperative that the people who handle animals are competent and have clear roles to carry out inspections thoroughly and deal with rejects in a timely and humane way.

The recommendations in this report are targeted at a variety of audiences: this is reflective of the wide range of stakeholders involved in the live export process. In addition, the recommendations are not restricted to a single inspection event or to the main individual inspection point or to an individual port. It is considered important to recognise that inspection, removal of injured animals and treatment is an inherent part of general animal care to ensure acceptable health and welfare standards. The committee recognises that ensuring the areas for improvement are properly addressed is a difficult task. However, the representatives do also recognise that good animal care, including health and welfare, is vital to the long term sustainability of the live animal export trade.

Appendices *

Appendix 1 - Terms of Reference for Review of the Inspection Regime Prior to Export of Export of Livestock from Fremantle Port

Appendix 2 – Flow Chart of Complete Export Process

Appendix 3 – Comparison of Inspection Outcomes for Sheep Exported from Southern Australian Ports

Appendix 4 – Examples of Records kept by DAFF

Appendix 5 – Opportunities to remove unsuitable animals from export consignments

*For copies of the appendices please contact animal.welfare@daff.gov.au