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Re Mortality Investigation Report 65: *Al Messilah*; 2.51% (4.36%) mortality voyage

Dear Dr Schipp,

VALE has significant concerns about the mortality figures for the high mortality voyage detailed in Investigation Report 65. A mortality rate of 4.36% was published in the original parliamentary report, *Livestock mortalities for exports by sea 1 July 2016-31 December 2016*.¹ Due to this, VALE requested and obtained documents pertaining to this voyage under the *Freedom of Information Act 1982*.

For any shipboard mortality figures to be meaningful, numbers of dead animals must equal the number of sheep loaded minus the number of sheep unloaded. In the case of this voyage of the *Al Messilah*, of the 69322 sheep loaded, only 1741 sheep (2.51%) were reported as being dead with 1286 sheep (1.85%) being in dispute. The AAV's End of Voyage report states that there was a loading dispute of 257 sheep (0.37%) and that this meant that "1029 less sheep discharged than loaded".

Following that underlined and bolded comment, the AAV's End of Voyage Report states "Following the Dubai discharge it became clear that there was going to be a shortfall in sheep numbers on board, and that there was a **reasonable likelihood** that from the 17th July onward **the daily mortality numbers reported were understated**. [Bolding by VALE].

The reason for any inaccuracy in counting of the daily death toll is that there was such a short time to collect and dispose of the bodies on the 17th before reaching Doha port, after which it was not possible to dispose of any of the ever increasing number of dying animals and bodies for the next 3 days, while there..... Marking bodies was ineffective as they were decomposing rapidly in the heat making marks difficult to distinguish and keep track of."

At no stage does the veterinarian attribute the 1029 sheep shortfall to a discharge number miscount. The veterinarian wrote two paragraphs to explain why the discrepancy had occurred and clearly attributed it to difficulty in counting rapidly decomposing sheep under horrific circumstances.

Despite this, the DAWR has accepted the **understated** 2.51% as the official mortality rate with 1286 sheep "unaccounted for". The investigation report states that "The exporter

¹ *The report has now been retrospectively amended with no reference to the original mortality percentage of 4.36%.

assigned this deficit to a loading dispute in which fewer sheep were loaded and more were discharged than what was recorded, with the latter being primarily responsible for the discrepancy.” If we accept that the number loaded was 257 less than recorded as per the AAV report, then 1029 sheep are “unaccounted for”. If we accept the exporter explanation rather than the veterinarian explanation for that discrepancy, then 1029 sheep appear to have escaped the supply chain.

There are only two possible explanations:

- 1) this was an extreme mortality voyage with close to 4.36% mortality (likely given the AAV comments and the obvious extent of the disaster) or that
- 2) roughly 1029 sheep (or more) have escaped the supply chain.

The latter would appear to be in breach of ESCAS but there is no mention of this in the Investigation Report.

VALE requests that as the Chief Veterinary Officer, you

- 1) explain why the reasonable and likely explanation about discrepant numbers from the government’s representative on that voyage, namely the AAV, was not accepted
- 2) explain why the government has not investigated a breach of ESCAS given that the exporter explanation of inaccurate sheep discharge numbers has been accepted over the explanation of the government’s representative on the ship

VALE are most concerned about this issue. The veterinarian’s explanation of understated mortality numbers should have been accepted. If the exporter explanation was considered more plausible than that of the government’s representative, then the ramifications of that decision should have been investigated, e.g. veterinarian incompetence in their role and likely breach of ESCAS.

In addition, it is of grave concern that sheep mortality numbers can be ‘flexible’ to a tune of 1.85%. The reportable level for sheep mortality under ASEL is 2% but if numbers can be changed by 0.37%-1.85% due to inaccurate counting, then clearly all government and industry claims should include that degree of uncertainty, e.g. average annual mortality of sheep is not 0.7% but in fact $0.7 \pm 1.85\%$ (a vastly different reality).

VALE is well aware that the overall mortality figures are inaccurate. Most shipboard veterinarians will try and keep sheep mortality figures to less than 2% if the figure is 2% or slightly above. The stated reason, as provided by shipboard veterinarians, is that a high mortality investigation report has negative consequences (increased workload and potential loss of employment) for no gain as the Department rarely if ever acts on the information to institute changes that would prevent such incidents from occurring again.

VALE agrees with the shipboard veterinarians. If the government examine the high mortality incidents on this ship alone, it is clear that the major predisposing factors are never addressed, i.e. carrying high numbers of sheep with inadequate ASEL space allowance to the extreme climatic conditions of the Middle East summer. It is notable in the AAV report for Voyage 65 that it is routine on this ship at this time of year to increase space after entering the Gulf (opening pens to use ramps and alleyways etc) which implies that the exporters are well aware that the spaces provided under ASEL (and Hotstuff) are inadequate in situations of high heat and humidity. Likewise reports have shown that even decreasing stocking density is insufficient to prevent a heat stress catastrophe (AAV reports on Voyage 38, another Emmanuel’s consignment, and Voyage 65). Emmanuels have been exporting sheep

to the Middle East for over 30 years. A review of high mortality voyages over the last 7 years shows that all high mortality voyages for this exporter during this period have occurred on the same two ships in the Middle East summer (Voyages 36, 37, 38, 40, 65) yet the department requested in 2017, that Emmanuels develop and implement a comprehensive heat event management plan. It is very apparent that the only reasonable and preventative action is to stop all voyages of sheep to the Middle Eastern summer, or at the very least stop them for this exporter who clearly has been unable to prevent “heat crashes” occurring on their ships. AAVs are indeed correct in their assertions that the government responses to their reports are inadequate.

If veterinarians are going to expose themselves to the consequences of high mortality investigation reports, the government must take their comments, and the ramifications of their comments seriously. Each incident must be investigated in light of previous high mortality incidents for the relevant ship, exporter, voyage destination and time of voyage.

Lastly, the conclusions of the veterinarian, the animal health professional and government representative should be accepted unless there are very compelling reasons to disregard such conclusions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Foster', written in a cursive style.

Dr Sue Foster BVSc MVetClinStud FANZCVS
Spokesperson, Vets Against Live Export