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## Review of Inspection Regimes Prior to Export of Livestock from Fremantle Port

A Submission by Vets Against Live Export (VALE)

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### **Introduction**

VALE members are veterinarians and other animal care professionals who have detailed knowledge of all aspects of the live export trade and its regulation. VALE's aim is to lead the transition away from live export by giving the public, veterinarians and government an independent, balanced and objective scientific view of animal welfare. VALE veterinarians regularly monitor the situation at Fremantle Port.

VALE's primary concern is animal welfare and VALE welcomes any improvements in the industry that will have positive welfare outcomes for the animals exported from Australia until such time as the industry is phased out.

VALE supports Recommendation 4 of the Farmer Review (2011) and has provided information on this current follow-up review of the inspection regime prior to export from Fremantle Port.

Individual animal inspection at loading, unloading, and feedlots is integral to welfare of the exported animals. The majority of Australia's sheep exports (approximately 70%) depart from Fremantle Port (Livecorp MLA Market Information February 2012). Cattle are also exported from this port. It is vital that procedures at the port are of the highest standard.

### **Submission using the Terms of Reference**

Throughout the document DAFF Biosecurity is referred to as AQIS as previous terminology and acronyms reflect the older name, AQIS.

The Terms of Reference (TOR) of the review provide the Current Inspection Regimes for sheep for export from Fremantle, compared to those from Adelaide and Portland.

The TOR state that at Fremantle the following regime is in place:

- Flock inspection at the registered premises by an AQIS-accredited veterinarian (AAV) required prior to application for a permission to leave for loading
- Individual animal inspection supervised by an AAV at port during the loading of the vessel (required prior to the export permit being issued). The inspection in Fremantle may take place using an elevated race with a drafting gate and pen
- Animal welfare inspection at port.

At Adelaide and Portland, however, there is:

- Flock inspection at the registered premises by an AAV
- Individual animal inspection at the registered premises supervised by an AAV (required prior to application for a permission to leave for loading)
- Animal welfare inspection at port.

The TOR provide no information on the inspection procedures in place for cattle leaving from Fremantle Port.

The following points are made for consideration by the Review:

1. The inspection regimes at Adelaide and Portland are not without problems and do not always deliver acceptable animal welfare outcomes as evidenced by the loading of inappropriate cattle from Portland on High Mortality Voyage 39 (<http://www.daff.gov.au/animal-plant-health/welfare/export-trade> FOI 2011/12-52)
2. It is possible that the only real difference between the ports is that “reject” sheep (animals that may not be fit to load onto a truck as well as fit animals that are “out of specification”) are only detected at the Port in Fremantle whereas at Adelaide and Portland, such sheep are detected at the Registered Premises (feedlot).
3. Given the potentially long distances from farms to feedlots and saleyards in WA, it is critical that only fit and “in-specification” animals are loaded on farm to reduce both to reduce unnecessary sheep transportation and to reduce the rejection rate at Fremantle Port.
4. Currently, sheep arrive at feedlots supplying Fremantle but are not inspected individually by the AAV (or staff under his/her supervision) until at Port, where sheep are observed as they run through the race up to the vessel. This does not allow adequate inspection of sheep and diseased individuals are not necessarily detected.
5. At Fremantle Port, most rejections occur at port and not at feedlot. The number of “reject” sheep which arrive at Fremantle Port, only to be euthanased or loaded on a truck for transport back to the feedlot or knackery is currently unacceptable and indicates a major flaw in the supply chain and pre-port inspection process. It is important to note:
  - a. The “reject” sheep constitute a significant animal welfare issue. Rejected sheep may have travelled up to 275 km (Amberley in Kojonup is approximately 3.5 hrs away) to get to port and if returned then have a return trip of up to 550 km. The closest feedlots are 60 minutes away if traffic is moving normally.
  - b. The sheep unfit to load onto the ship, but not euthanased, complete this unnecessary trip with significant health issues. This transport of compromised animals, including from the feedlots to the Port, is unacceptable on welfare grounds and, depending on the degree of

- compromise, may be in breach of the Australian Standards for the Export of Livestock (ASEL) and/or state legislation.
- c. The fit “out of specification” sheep, whilst fit to transport, still have to undertake a completely unnecessary trip exposing them to unnecessary stress and the risk of injury.
  - d. The responsibility of the AAV for sheep rejected at the Port of Fremantle requires urgent clarification. There is no apparent requirement for the AAV to provide a plan for the care and treatment of “reject” sheep that are not euthanased at the Port or to oversee their recuperation at the feedlot, or disposal.
  - e. Sheep for disposal are either euthanased at the feedlot or on-transported to knackeries for slaughter for pet meat.
  - f. The AAV is not required to inspect these “at-risk” sheep individually to ensure they are fit to load to be transported to the knackery or to be present to ensure their appropriate handling at the knackery. ASEL does not provide for the care of “reject” sheep at knackeries even though these establishments are an integral part of the live export chain.
  - g. Knackereries do not have resident veterinary supervision and the Animal Welfare Act 2002 does not provide routine access for government or RSPCA inspectors. In WA, one knackery is currently facing cruelty charges as is the live export company that supplied sheep to that knackery.
7. The shortcomings of the current inspection regime at Fremantle are exacerbated by:
- a. insufficient AAVs present at the Port to ensure proper inspection of individual sheep and to ensure the welfare of all sheep at the Port, including those rejected from loading the vessel or which escape during loading;
  - b. lack of experience, judgment or training of some AAVs, which leads to failure to recognise the discomfort and pain of many common ailments such as “pink eye” or to differentiate between mild and advanced disease;
  - c. the fact AAVs are contracted and paid directly by the exporter contrary to the recommendation by the Keniry Review (2004)
  - d. lack of thorough and consistent monitoring and inspection by AQIS, DAFWA and the RSPCA;
  - e. the fact that Commonwealth and State legislation differ and that WA agencies monitor purely for compliance with their local legislation rather than compliance with ASEL and in most instances are not conversant with ASEL
  - f. failure of State agencies administering the AWA 2002 to respond to calls from the public, welfare groups and veterinarians about sheep in distress on their way to the port through Fremantle, entering the port gates or as observed at port.

### **Recommendations to improve animal welfare at Fremantle Port with respect to the TOR**

1. To ensure the independence of AAVs, Recommendation 4 of the Keniry Review (2004) should be adopted. In essence, AAVs must be “directly contracted and accountable to AQIS in the performance of the duties” and “...their responsibilities must be referenced in export legislation with suitable penalties for any breach; livestock exporters should be allocated a “third

party” veterinarian by AQIS at the time they advise AQIS that they intend to export; and livestock exporters should pay all costs associated with the services of these veterinarians”. VALE believes this is a crucial step in improving animal welfare in live export generally and at Fremantle Port specifically.

2. An AAV must be present at the unloading of animals at the feedlot to ensure only healthy and “in-specification” animals are accepted, and to ensure “reject” animals are properly identified, treated or euthanased. Identification of animals that are not “in specification” or have injuries or illness that in the AAV’s view were present on farm, as well as injuries in transport, should be recorded by the AAV and sent simultaneously to AQIS, DAFWA and the exporter (as per modeled on the system of AQIS-accredited export abattoirs).
3. An AAV must visit the feedlot daily to ensure the health and welfare of animals in any consignment. Any adverse incidents or treatments must be recorded for each individual animal by the AAV and sent simultaneously to AQIS, DAFWA and the exporter.
4. An AAV must oversee treatment of any sheep and cattle at the feedlot and keep proper records for individual animals. These records should be freely available to AQIS, DAFWA and The Veterinary Surgeon’s Board of Western Australia.
5. An AAV must certify each animal in a consignment is healthy and “in-specification” at the feedlot before AQIS approves Leave for Loading.
6. An AAV must be present at the loading of the animals at the feedlot for transport to the Port to ensure only healthy animals are loaded. Any adverse incidents must be recorded by the AAV and sent simultaneously to AQIS, DAFWA and the exporter.
7. An AAV must be available to attend to compromised animals in trucks arriving at the Port.
8. Sufficient AAVs must be available to ensure the presence at the Port of at least one AAV at all times during a loading. An AAV must provide the identification of each “reject” animal at the Port, the reasons for rejection, and the proposed plan for that animal. This documentation must be sent simultaneously to AQIS, DAFWA and the exporter.
9. An AAV must ensure that any “reject “ sheep or cattle that require euthanasia are euthanased promptly and not “batched” for convenience.
10. An AAV must ensure that any “reject” sheep or cattle that are to be transported to the knackery for slaughter are fit to load. An AAV should supervise slaughter procedures at the knackery to ensure a high standard of animal welfare for the “reject” animals.
11. The AQIS accreditation course for AAVs must be reviewed to ensure a high level of veterinary expertise, given the pivotal role of the AAV in ensuring the health and welfare of animals in the live export chain. There should be a practical component to the course including mandatory low stress handling training in addition to veterinary training and accreditation should include compulsory continuing education. Particular attention should be given to diseases, such as “pink eye” and the inanition/salmonellosis complex that are prevalent in the feedlot sheep being loaded onto the vessels for export.

### **General issues not addressed in the TOR**

VALE wishes to comment that the terms of reference are narrow and that their observation of procedures at Fremantle Port and their analysis of voyage documents also indicate numerous other animal welfare issues, some of which are endemic:

- poor livestock handling skills by both truck drivers and stevedores;

- unnecessary, inappropriate and sometimes illegal use of electric goads on livestock;
- failure of drivers to check their load once inside the gate at the end of the journey (contravening ASEL) and take necessary action with respect to obvious animal welfare issues;
- inappropriate stevedore schedules that result in long, unnecessary and poorly timed breaks to stock unloading at Fremantle Port, with no apparent concern for animal welfare issues;
- that stock may spend long uncomfortable or life-threatening hours in direct sun during the Fremantle summer (with recorded temperatures in the shade above 40°C); stationary vehicles in full sun are a particular risk with respect to heat stress of the animals;
- failure to have the ship ready for appropriate loading at the time of loading eg sheep loaded into cattle pens that do not have netting with the issues having to be sorted after the vessels have set sail

VALE also wish to note that the time allotted for review was short and that it did not permit for an in depth analysis of the issues at Fremantle Port with specific referencing to ASEL.