

OVERVIEW

“There is a general perception that the IO program is not fulfilling its objectives.”

“Animal welfare groups expressed concerns about a lack of regulatory compliance, citing recurring issues across subsequent reports, demonstrating that no effective changes have been made.”

“Industry’s biggest concern is the cost burden, borne by a relatively small number of exporters.”

“Although there is evidence that observers have identified some significant issues, and there have been some worthwhile improvements as a result, there remain meaningful challenges and concerns with the IO program that require urgent attention.”

RELEVANT DETAILS

Necessity for IOs

A post-implementation review into the independent observer program found that **reports from onboard Australian Government accredited veterinarians (AAVs) and stockpersons often lacked sufficient detail for the department to make informed regulatory decisions (DAWE and AMSA 2020)**. VALE considers this highlights the importance of the IO program whilst AAVs and stockpersons remain appointed and employed by the exporters. It is disappointing that the IGLAE did not make the simple recommendation that all voyages should be accompanied by an independent Dept-employed (exporter funded) veterinarian as so long recommended by both VALE and the Australian Veterinary Association!

Low rates of IO deployment

During 2022 and 2023, only 23 voyages departed with an IO on board. During the 2023 calendar year, 117 of the 218 livestock voyages met the specific criteria for deployment and only 12 voyages (10%) were accompanied by an observer. The fact that IOs are not being deployed on most voyages that meet the criteria for a deployment is evidence that the program’s assurance objectives are not being met. The most common reason for an IO not being deployed (70%) is an exporter using a statutory declaration as evidence an IO cannot be accommodated aboard a vessel.

Insufficient cabin space accounted for the majority (58%) of non-deployments. In 2023, there were instances of 2 vessels being able to provide accommodation space for an IO for one exporter but not for different exporters on other voyages, who provided statutory declarations to claim insufficient cabin space. There could be reasonable explanations for this, such as increased livestock numbers requiring more stockpersons on board. However, several stakeholders believe that some claims of insufficient accommodation space may not be accurate, as highlighted in submissions

The 12 voyages with IOs on board only accounted for 5 of the 15 exporters. Four of the 12 voyages with an IO had consignments of livestock on board from 2 exporters, one of these exporters did not have an IO on any voyage they chartered solo. One exporter accounted for 6

out of the 12 IO-deployed voyages. This exporter only had one voyage without an IO on board, and the reason given for non-deployment was safety concerns at the port of destination. There have been issues noted regarding the increased use of statutory declarations. There are times when a statutory declaration has been provided the day before a ship is due to depart and the department has accepted it. In this situation, the IO deployment team has already invested considerable time and resources into preparing for an IO deployment. Late cancellations mean the efforts invested return no result and end up costing the department financially, because predeployment activities are not cost-recovered from industry if a deployment does not go ahead. A second issue is that statutory declarations are coming from the exporter and vessel operator, not the master of the vessel, who often is in a better place to provide this information and is not financially disadvantaged by having an IO on board. According to submissions, there have been instances where vessel masters have enquired as to why they are not getting an IO, indicating they may not have been included in discussions regarding accommodation availability. Statutory declarations are also being provided for vessels that were previously able to accommodate IOs.

Delays in report release.

During this review, many individuals and organisations raised concerns regarding lengthy unacceptable delays in providing IO voyage data. There were also significant concerns raised about the inadequate details in the data. Concerns were also raised regarding similar issues recurring over multiple reports, indicating a lack of visible action being taken to address them.

Failure of co-operation of exporters

“The inspector-general was informed that the department has worked to facilitate meetings between the two [Dept and exporters], but the parties are not obligated to cooperate or communicate. This is most unfortunate and unhelpful, given the potential for monitoring technology to supplement and strengthen the effectiveness of IOs. “

Criticisms of ASEL

“For example, the ASEL could provide specific measurable scales or scores for criteria such as panting, faecal pads, feeding, behaviour or general demeanour; these factors are not presently mentioned in the ASEL. Language in other areas relating to issues that impact on animal health and welfare is also not specific, for example, in relation to animal handling during loading the ASEL uses terms such as ‘satisfactory’, without further detail or explanation:

4.1.7 A competent stock handler must be appointed by the exporter to be responsible for the handling, management and welfare of the livestock. The exporter must ensure that loading facilities and livestock handling standards at the port of embarkation are satisfactory during unloading from the land transport, inspection and loading onto the vessel (ASEL 2023).”

Industry claims re LIVEXCollect digital platform

The report states that the LIVEXCollect digital platform commenced development in mid-2023 and user testing on voyages commenced at the end of 2023 – not exactly what was conveyed to the Parliamentary Enquiry!

CONCLUSIONS

9VALE bolding)

“Taking into consideration the trends noted in the 2023 data, the number of exporters receiving IO deployments and the livestock species on board voyages, **the IO program does not appear to provide acceptable levels of assurance regarding the health and welfare of livestock across all markets.**”

“**The increased use of statutory declarations has resulted in such reduced numbers of IO deployments as to render them ineffective in assuring the department that low and medium risk voyages, such as buffalo and cattle from Darwin to Indonesia, remain at their historical risk level.** The inspector general believes that the department should consider ways to strengthen the deployment of IOs to cover all markets and exporters. Enforcement could be made a condition of their export licence..”

“From the submissions received, there was **a common concern relating to the timeliness and the information provided in the voyage data and summaries published by the department.** Industry considered that delays in having reports provided to exporters prevented them from having time to make changes. For welfare groups, the delays in publication and the ‘highly sanitised’ summaries from the department, undermine the transparency of animal welfare reporting.”

“**There is a prevailing sentiment that the IO program has failed to achieve all the intended goals.**”