The Australian Veterinary Association

Submission to the Independent Review into Australia’s livestock export trade

15th July 2011
Executive summary

There is a diversity of opinion among our members as to the pros and cons of livestock export but there is one clear principle that has overwhelming consensus - the protection of animal health and welfare of exported animals is paramount.

If Australia exports animals there must be verification, transparency and accountability of the trade by independent bodies that report directly to the government. A ‘whole of chain’ approach will ensure adherence to the equivalent animal welfare standards that are practised in Australia and demanded by the Australian population. This approach should include independent auditing to prevent ‘leakage’ of animals from a closed loop system and also enforcement of agreements with exporters to maintain control of the animals to immediately post slaughter.

The Australian Veterinary Association (AVA) recognises that importing countries are sovereign states and understands that there are difficulties, both culturally and with infrastructure, that impact on animal welfare standards. By remaining engaged and assisting these countries to raise animal welfare to levels accepted as normal practice in Australia inevitably will lead to improvements in global animal welfare.

Sharing Australia’s expertise with animal transport, feedlot management and slaughter practices will benefit importing countries by improving supply to their populations of a high quality protein source and aid in providing food safety and food security into the future. This will not be at the expense of animal welfare but rather as a flow on from protection of animal health and welfare through the ethical treatment of animals. This is a win – win situation for global animal health and welfare and food security for our near neighbours.

The AVA has made recommendations to help to achieve this outcome and has been pleased to contribute to this review. The expertise of our members is an important resource for our country and by directly engaging with other countries’ veterinary services, we can continue to promote global animal health and welfare.

The AVA is the national organisation representing veterinarians in Australia. Its 6500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the association.

The AVA would be available to provide further information or clarification to the review as required.
Recommendations

**Recommendation 1:** The AVA strongly supports stunning of animals prior to slaughter and supports industry and government assistance in implementing this ‘best practice’ procedure in all importing countries.

**Recommendation 2:** The health and welfare of exported animals is paramount to continuing a viable export industry. Compliance and enforcement through auditing, independent oversight and possible suspension and withholding of export permits allows the Australian Government to maintain control of the export industry.

**Recommendation 3:** Include a requirement into the Consignment Risk Management Plan (CRMP) that states the Australian Government can mandate a closed loop system, including pre-slaughter stunning, that could be implemented and independently audited to ensure exporter compliance.

**Recommendation 4:** Further granting of Approved Export Programs (AEP) should become dependent on demonstrating there is no ‘leakage’ of animals from the closed loop system and electronically tracing animals from preparation of animals on farm in Australia to immediate post-slaughter in the importing countries.

**Recommendation 5:** Animals exported for breeding purposes would transfer to the importer’s legal responsibility, but there must be signed commitments that this transfer would not be a desktop mechanism to divert animals to unaudited slaughterhouses.

**Recommendation 6:** To maintain independence, take the employment of the AQIS Accredited Veterinarians out of the exporters’ control and place it back into government control. This includes 100% cost recovery by the government from industry.

**Recommendation 7:** There should be whole of chain oversight, auditing and verification from selection and preparation to immediately post-slaughter. The guiding principles for the export of Australian livestock from Australia contained in the ASEL document should be verified and enforced.

**Recommendation 8:** A suitably qualified and experienced veterinarian should be on all voyages to ensure the highest standards of animal health and welfare. Their responsibilities should not be transferred to non-veterinarians of varying training and capabilities.

Introduction

At the recent G20 Agricultural Ministers meeting in Paris (June 2011), the importance was stressed “of a significant increase in agricultural production and productivity, considering the diversity of conditions world-wide and the need for a sustainable use of natural resources, in order to respond to the challenge of a growing demand. To feed a world population expected to reach more than 9 billion in 2050, it is estimated that agricultural production will have to increase by 70 percent over the same period and more specifically by almost 100 percent in developing countries”.

Australian farmers are well placed to meet this need but also recognise that animal health and welfare must be protected. Australia must remain engaged with importing countries in order to help influence their thinking about animal welfare and help them implement best animal welfare practices.
The Australian public and the AVA demand this and will require evidence of an open and transparent system to safeguard the welfare of exported animals. Australian veterinarians are in constant contact with the community and we accept their expectation of being a strong advocate for animal health and welfare.

The AVA has developed and ratified a position statement on live animal export and a policy on humane slaughter after carefully and extensively debating these complex issues. Both these documents have been attached as Appendix A.

The pivotal beliefs of the AVA’s export position statement are that:

There must be strict adherence to the following requirements to protect the health and welfare of animals when they are exported to provide food or genetic material.

- Importing countries should be members of the World Organization for Animal Health (OIE) and have a legislative commitment to ongoing monitoring and enforcement of animal welfare standards.

- Animal health and welfare should be protected from farm gate to slaughter through a ‘whole-of-chain’ enforcement of the OIE animal welfare standards at a minimum.

- Importing countries should apply stringent welfare standards that, as a minimum, conform to the World Organisation for Animal Health (OIE) animal welfare standards for the animals they receive.

- Within Australia, higher welfare standards than mandated by the OIE are required and Australian authorities must work to promote similar standards in importing countries. When animals are to be slaughtered they must be humanely rendered unconscious until death.

- The Australian Standards for the Export of Livestock (ASEL) and Australian Maritime Safety Authority requirements must be enforced by the Australian Government and regularly reviewed and updated.

- There must be an effective dispute resolution process agreed between governments.

- Contingency plans must be in place to ensure that the welfare of exported animals is protected if they cannot be unloaded at the designated port.

- There needs to be continued research and development into the health and welfare of livestock at all stages of the export process.

Our humane slaughter policy states:

Slaughter of animals must be carried out in a humane manner. Animals must be humanely rendered unconscious until death.

Both these policy positions have recently been confirmed by extensive member consultation and debate.
The AVA believes that World Organisation for Animal Health (OIE) standards must be enforced and that Australia assists importing countries to rapidly work towards stunning prior to slaughter.

1. Livestock exports

1.1 Why export livestock?

Australia is a very efficient producer of food from both plants and animals, and plays a pivotal role in ensuring the food safety and food security for its own and other world populations. To feed the expected nine billion world population around 2050, farmers in this country have an obligation to use their expertise to promote global food security.

- Advances in breeding and transport of animals over the last 10 to 20 years in the live export industry demonstrate that Australian farmers have responded to the requirements of importing countries to supply their specific needs.

- In the case of Indonesia, Australian farmers have bred animals specifically for the export trade for entry into feedlot facilities in Indonesia and to supply the many wet markets.

- Many argue that Australia should value add and supply chilled and frozen meat after slaughtering in Australian facilities, however the infrastructure in Indonesia to deal with refrigeration on a large scale is inadequate and unreliable.

- The lack of slaughter facilities in northern Australia and the high cost of running a facility that would only work for 6 months of the year due to the wet season, makes this option unachievable at the present time.

- The high cost of a support workforce that is in competition with the mining industry also means the cost of attracting a sustainable workforce would lift the price of chilled and frozen meat beyond what the average Indonesian can afford and reduce demand.

- Export of 250 to 350 kg animals to be fattened in Indonesian feedlots is the preferred option by Indonesia for their population to access a high quality protein source at an affordable price.

1.2 Humane slaughter

There is a diversity of opinion amongst our members as to supporting livestock exports. However there is strong consensus on one issue – animals must be slaughtered humanely and stunned prior to slaughter.

1.3 Whole of chain oversight, auditing and verification

The AVA can act in a facilitating role as an independent body that sources expertise in verification of whole of chain management of animals from preparation through to immediate post slaughter. AVA can assist in verification, traceability and monitoring systems to prevent ‘leakage’ of animals and strict adherence to the ASEL and OIE standards of animal health.
and welfare. It has little expertise in auditing and is aware of more suitable independent international audit organisations.

1.4 Animal welfare

The AVA can draw on the expertise of its members who have specialised animal welfare and ethics experience as well as members with international trade experience. The protection of animal welfare is paramount and is expected by the Australian population.

Maintenance of acceptable international welfare standards combined with the requirement for pre-slaughter stunning and independent verification of compliance is a prerequisite for continuing livestock export.

Expertise in food safety, quality assurance and OH&S drivers for improved practices can be facilitated.

2. Terms of reference responses by the AVA

The terms of reference for the independent review into Australia’s livestock export trade are to examine:


The AVA recognises that Australia and Indonesia are members of the OIE and support the recommendations and standards set out in the Terrestrial Animal Health Code (2010). Australian standards are at a level above the OIE standards and we support assisting Indonesia to also achieve similar higher standards. The AVA strongly supports stunning of animals prior to slaughter and supports industry and government providing assistance to all importing countries to help them implement this ‘best practice’ procedure.

b. the adequacy of the Australian Standards for the Export of Livestock (ASEL) as they apply to the preparation and export of all livestock with consideration of responsibilities for compliance and enforcement of the ASEL

ASEL\(^3\) was first published in November 2006 and has been reviewed as recently as 2011 (Version 2.3). The standards were developed from the framework of the Australian Position Statement on the Export of Livestock which was part of the Australian Government’s response to the Keniry Review\(^1\) (2003) of the livestock export industry. The AVA supports this document as it; “represents the basic health and welfare requirements for the conduct of the livestock export industry”.

The AVA considers that the health and welfare of exported animals is paramount to continuing a viable export industry. Compliance and enforcement through auditing, independent oversight and possible suspension and withholding of export permits allows the Australian Government to maintain control of the export industry.

The ASEL is mandated to be in effect up to the point of disembarkation and Australian Government jurisdiction over the animals ceases when disembarkation is complete.
ASEL, Version 2.3, 2011, p.10) The recent vision portraying inhumane slaughter practices of animals in some slaughterhouses has highlighted the need to extend the influence of Australian standards to immediately post-slaughter. An additional standard outlining the management of livestock from point of disembarkation to the point of slaughter ensuring humane slaughter is required. These standards must provide detail as to the handling of livestock in any registered premises, in lairage and in the knocking box or restraint crush, up until the point of confirmed death. These standards must include animal based measurements, provision of adequate facilities, identification of persons responsible and all associated documentation.

With industry cooperation, the AVA believes that by including a requirement into the Consignment Risk Management Plan (CRMP), the Australian Government can mandate a closed loop system that could be implemented and independently audited to ensure exporter compliance. Further granting of Approved Export Programs (AEP) should become dependent on demonstrating there is no “leakage” of animals from the closed loop system and electronically tracing animals from preparation of animals on farm in Australia to immediate post slaughter in the importing countries. Animals exported for breeding purposes would transfer to the importer’s legal responsibility, but there must be signed commitments that this transfer would not be a mechanism to divert animals to unaudited slaughterhouses.

The AVA believes that a qualified and experienced veterinarian should be on all voyages to ensure the highest standards of animal health and welfare can be put into place. Such responsibilities should not be transferred to non-veterinarians of varying training and capabilities. Veterinarians are the professionals with the expertise and capabilities to address animal health and welfare issues that may arise during the exportation of animals and their presence will provide an extra level of safeguard to animal health and welfare.

c. the adequacy and effectiveness of current Australian regulatory arrangements for the live export trade

Veterinarians wanting to work in the livestock export industry must be an AQIS Accredited Veterinarian (Livestock) (AAVET). This entails a veterinarian completing the Accreditation Program for Australian Veterinarians (APAV), which educates the veterinarian on how to interact with government agencies and departments, and then completing the AAVET course as a separate module. This module, “is designed to inform veterinarians involved in the pre-export preparation and/or shipboard services for livestock of their legislative responsibilities as an AQIS Accredited Veterinarian (Livestock). It also provides relevant background information about the livestock export process”.

The AAVET veterinarian must be an Australian citizen and be registered by a state or territory veterinary surgeons’ board.

The AVA supports this system of accreditation but believes that the independence and impartiality of the AAVET may have the potential to be compromised due to that veterinarian being employed by the exporter. There also seems to be a lack of AQIS inspector oversight and auditing of the veterinarians that potentially can lead to inefficient practices and shortcuts being enforced by exporters that have the potential to compromise the health and welfare status of the animals being exported. The AVA feels that to maintain independence, it may be worth taking the employment of the veterinarians out of the exporters’ control and placed back into government control. This could then be 100% cost recovered by the government.
d. the types of livestock suitable (weight, age, body condition, breeds) for export as feeder or slaughter animals

The AVA supports the ‘Fit to Load’ program that was first trialled in Western Australia and then rolled out to the rest of Australia. The application of ASEL and the development of the industry draft Livestock Export Veterinary Handbook help to provide clear standards and guidelines to protect animal health and welfare. AVA recommends a contingency plan to apply at any point along the supply chain outlining procedures for the humane disposal of any animals that are deemed ‘unfit to load’ or are deemed unfit in the event of an animal health and welfare emergency should be produced.

The AVA acknowledges the northern Australian cattle industry, in conjunction with other industry groups, and the work they have done over the last 20 years in breeding animals more suited to the conditions in the importing countries and also the preparation of these animals.

e. the extent of monitoring required for each export consignment of feeder or slaughter livestock, in a manner that ensures accurate and transparent reporting to the Australian Government of the condition of the livestock from departure from Australia up to and including the point of slaughter in the country of destination

- Whole of chain oversight and verification by independent people with appropriate expertise such as veterinarians could be conducted on an unannounced and randomised basis and be reportable to an Australian Government body. Auditing should be conducted by independent international auditing bodies again reporting to the Australian Government.
- Electronic identification of all animals to maintain traceability can ensure no leakage of animals. This applies to feeder or slaughter animals.
- Breeder animals are transferred to the new owners, but a written guarantee should accompany the bill of sale to prevent this pathway being used to divert animals to alternate slaughter facilities.

f. the risk management strategies necessary to address the welfare of animals from departure from Australia, up to and including the point of slaughter in the country of destination

- The CRMP can be used by the Australian Government to stipulate pre-slaughter stunning. It can be written into the CRMP to become binding on the exporter to immediate post-slaughter.
- Independent auditing that reports to the Australian Government on a twice yearly basis could be used in conjunction with the whole of chain oversight reports to minimise failures with the closed systems.
- Hazard Analysis Critical Control Point (HACCP) is an internationally recognised risk minimisation system that enhances identification of possible process failure points and inclusion of appropriate monitoring and controls. Applying this assessment procedure should minimise risk factors.
- Mandatory reporting to the Australian Government of any failure within the closed system will allow corrective action in a timely manner or further similar breaches may impact on granting of future permits to export.

g. other matters relevant to these terms of reference that the reviewer considers appropriate.
The AVA strongly supports the guiding principles for the export of Australian livestock from Australia contained in the ASEL document on page 12 and would recommend an extension of the ASEL standards from the point of disembarkation to immediate post slaughter. The guiding principles should include the section in bold below to close this gap.

- The health and welfare of animals is a primary consideration at all stages of the livestock export chain.
- All participants throughout the livestock export chain are responsible for the health and welfare of the animals in their care.
- The operation and regulation of the livestock export industry is conducted in a transparent manner, in which accountabilities, roles and responsibilities are clearly defined and met.
- Animal health and welfare requirements that apply to the livestock industry are consistent with those applying to other livestock industries in Australia.
- Participants in the livestock export industry are demonstrably competent and operate in accordance with the national animal health and welfare system in an environment that encourages sustainable improvement.
- Livestock export consignments from Australia meet the requirements of the national animal health and welfare system and importing country requirements.
- The export of livestock requires a risk based approach throughout the export chain, including up until the point immediately post slaughter, and development of appropriate risk minimisation strategies.
- The Australian Government and the Australian livestock export industry remain committed to furthering improvements in the health and welfare of livestock in the live export chain in Australia, including by supporting relevant research and development initiatives.
- The Australian Government and the Australian livestock export industry remain committed to furthering the health and welfare of livestock in importing countries by fostering cooperation and goodwill, sharing Australian technical expertise, providing educational and training opportunities, and supporting infrastructure.

3. References


Appendix A – AVA positions

Position statement on live animal export

There must be strict adherence to the following requirements to protect the health and welfare of animals when they are exported to provide food or genetic material.

- Importing countries should be members of the World Organization for Animal Health (OIE) and have a legislative commitment to ongoing monitoring and enforcement of animal welfare standards.

- Animal health and welfare should be protected from farm gate to slaughter through a ‘whole-of-chain’ enforcement of the OIE animal welfare standards at a minimum.

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- There must be an effective dispute resolution process agreed between governments.

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- There needs to be continued research and development into the health and welfare of livestock at all stages of the export process.

Background

Animals are exported for food and genetic material.

It is important to engage with the livestock export industry and international veterinary associations to promote the welfare of animals globally and to help safeguard the welfare of all exported animals.

If Australia removes itself from the trade, any shortfall of supply will be sourced from other countries and the welfare standards applying to those animals are likely to be considerably less than those we impose.
Australia is working to improve animal welfare in importing countries and if the live export trade ceases then this input may be compromised.

Effective operational protocols should be in place at all times to safeguard the welfare of exported animals. These protocols should include the accreditation of abattoirs, training of employees and the implementation of an independent animal welfare auditing process, as is the case in Australian processing establishments.

Other relevant policies and position statements

15.6 Humane slaughter

References


Ratified by the AVA Board 11 July 2011

Policy on humane slaughter
Slaughter of animals must be carried out in a humane manner. Animals must be humanely rendered unconscious until death.

Background
The slaughtering of animals is usually to provide food, although animal slaughter can also be used for population control and disease eradication. Arrangements should be in place so that animals are spared unnecessary excitement, pain, stress or suffering during movement, restraint, stunning and slaughter.

Regardless of religion or cultural beliefs, animals must be humanely rendered unconscious prior to exsanguination. A sheep can remain conscious for 7 to 20 seconds after its throat is cut, while loss of consciousness in cattle under similar circumstances can take up to two minutes.

There are species-specific Australian guidelines on how to slaughter animals humanely. These are outlined in the animal welfare model codes of practice as well as in industry standards.

References

Ratified by the AVA Board 8 July 2011