



Monitoring and reporting during live export voyages - review by the Interim Inspector-General of Live Animal exports (IGLAE)

Submission from the
Australian Veterinary Association Ltd



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About Us

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9,500 members come from all fields within the veterinary profession, including clinical practitioners, government veterinarians, and those who work in industry, research and teaching. Veterinary students are also members of the AVA.

Introduction

The topics within scope of the Inspector-General's review cover the Department of Agriculture's requirements and activities for monitoring and reporting during live export voyages. The AVA has approached this response by addressing each topic in turn. We also have provided links and references to previous live export submissions by the AVA, which address many of these topics in greater detail.

Response

1. Monitoring and reporting requirements from the time loading of a vessel is complete to when the last animal has been unloaded from the vessel at the overseas destination(s)

See previous AVA submissions into the ASEL review:

[Stage 2 ASEL Review. AVA response to Stage 2 Issues Paper](#) – 19 September 2018.

- **See section 3.0 – Reporting and investigations – pages 6 – 11**, in which the AVA has set out requirements for recording and review of morbidity and mortality data on each voyage. AVA has provided a list of welfare indicators that should be included in the daily voyage report, and recommendations around epidemiological assessment of these with a view to making immediate, continuous and ongoing improvements to animal welfare on every future voyage.
- **See Section 8.0 – On board personnel, management and care** – pages 36-37, addressing the role of ship-board veterinarians and stockpersons in monitoring, reporting and animal care. It is AVA policy that there should be at least one veterinarian on board every live shipment regardless of voyage length.

[ASEL Draft Revised Standards. AVA submission](#) – 27 November 2018

- **See Section 4F – Reporting animal welfare outcomes – pages 17 and 18**, in which the AVA has discussed notifiable incidents, and has proposed improvements in the requirements for daily pen-side reporting of animal welfare indicators. The AVA does not support the exemption on daily reporting for journeys less than 10 days; daily reporting should apply to all voyages, irrespective of journey length.
- **See also page 21 – Appendix J – Daily report Pro-forma**, specifically regarding panting scores and ventilation monitoring.

2. The extent to which monitoring and reporting provides assurance of compliance with the legislation, standards, policies and procedures for the export of livestock

To date, Independent Observer (IO) Report Summaries issued by the Department of Agriculture have not been sufficiently detailed to determine compliance with legislation or comprehensively assess animal welfare outcomes. For this reason, the AVA has been disappointed that IO reports were not made available to us in full by the Department. These only became available once a third party obtained them from the Department under an FOI request.

In June 2018, the AVA provided a submission into the [Review of Live Animal Exports Regulatory Capability and Culture \(Moss Review\)](#).

The AVA's Conclusions and Recommendations (page 16) state:

Conclusion and Key Recommendations – AVA Submission into Moss Review

Overall, the AVA is of the view that the Department has been ineffective in its regulatory role in the context of livestock export. This submission has made several recommendations to remedy this situation including:

1. Reinstatement of an independent expert advisory body for national animal welfare coordination.
2. The components of the Heat Stress Risk Assessment Model, and the model algorithm are made transparent to facilitate independent verification.
3. Investment in technology is made to facilitate cloud based, real time, transparent, immutable reporting based on animal welfare indicators. Data should be secured using Blockchain technology. The resulting big data set must be used for ongoing scientific research and to inform science-based continuous improvements based on animal welfare indicators.
4. Investment in further resources for the Department is made to ensure the department has the requisite resources to fulfil its regulatory and investigatory role appropriately. Resources include financial and human resources. Specifically, the Department must be resourced with team members with the leadership skills, deep knowledge and understanding of the industry, animal health and welfare and epidemiology.
5. Triggers for investigation are revised. Triggers for investigation should include mortality, but also be automatically triggered by automated technology reporting environmental and animal welfare conditions and by reports and comments made by the Australian Accredited Veterinarians (AAVs). It is also critical that voyages are investigated at random, to prevent adjustment of rates to avoid investigation or the temptation or pressure to do as such.
6. Further development of a construct where AAVs are engaged by an independent, DAWR audited, third party provider.

3. The extent to which monitoring and reporting requirements support or contribute to the mitigation and management of risks to animal welfare during voyages

It is not clear that current monitoring and reporting arrangements are consistently resulting in appropriate actions to mitigate risks to animal welfare. For example:

[Mortality Investigation Report 76](#) concerns a shipment of cattle to the Philippines in October 2018, in which cattle mortalities exceeded the reportable level, thus triggering an investigation. It was concluded that heat stress leading to respiratory disease (pneumonia) was the contributing factor in the majority of mortalities.

Given the event, it would be normal practice and appropriate for the Department of Agriculture to require that a veterinarian accompany the next shipment, however this did not occur. An extract from the report follows:

“The department would ordinarily require an AAV to accompany the next consignment to the market. SEALS provided a request with reasoning to the department as to why an experienced stockperson would provide greater health and welfare outcomes for the livestock. The department approved the request but placed additional reporting conditions on the voyage for the stockperson to undertake as an Independent Observer could not fit on board.”

The AVA is concerned by the statement that “an experienced stockperson would provide greater health and welfare outcomes for the livestock” (than a veterinarian) and the Department’s decision to support the request.

While the AVA acknowledges that an experienced stockperson can contribute important skills to the care of animals on-board ship, it is difficult to understand a conclusion that these skills would be superior to those of a veterinarian, particularly when the treatment of the animals on the October voyage required use of restricted (S4) drugs under (remote) veterinary direction, and it was expected that this would be necessary in the subsequent voyage.

The report states that there was a need to load “additional veterinary medicines (including antibiotics and anti-inflammatories) on board the next consignment” to address the potential for further mortalities. As it is usual to have an AAV accompany a shipment following a reportable mortality event, and the use of restricted veterinary medicines was deemed likely in this subsequent consignment, the AVA is concerned that a decision was made to support the exporter’s request to not include a veterinarian on board.

This example raises concerns about the extent to which monitoring and reporting is leading to appropriate actions to mitigate risks for subsequent voyages.

4. The department’s processes for engagement and consultation with industry, other Australian Government agencies and stakeholders such as vessel operators, in managing animal welfare issues during voyages

The AVA was part of the Reference Group for the review of the ASEL standards. AVA provided extensive input into the ASEL review and review of the Heat Stress Risk Assessment (HSRA) model. AVA is now a member of the Department’s Live Export Animal Welfare Advisory Group (LEAWAG).

Throughout the process, the Department informed the ASEL Reference Group just prior to release of review documents to the public, however this did not allow sufficient time for the Reference Group to provide meaningful comment prior to their release. Notwithstanding this, the AVA has been generally satisfied by the Department’s consultation process.

5. The roles and responsibilities of persons directly responsible for managing and reporting of animal welfare issues during a voyage, including:

- Australian Government accredited veterinarians (AAVs)
- Accredited stockpersons

See: [Stage 2 ASEL Review. AVA response to Stage 2 Issues Paper](#) section 3.0 and 8.0, where AVA has addressed the role of ship-board veterinarians and stockpersons in monitoring, reporting and animal care [as noted above in topic (1), above].

6. Examine the efficacy, timeliness and transparency in the department’s management and use of reports, including the extent to which they contribute to strategic risk-based regulatory practice and informing improvements in the management of animal welfare during voyages

There has been significant delay in release of IO report summaries by the Department. For example, IO Summary Report 7 took 11 months before being published. Others have been in progress for a similar duration, as shown below.

22	Gloucester Express	Cattle to China	September 2018	Completed
21	Maysora	Cattle to Israel and Jordan	September 2018	In progress
20	Bahijah	Cattle to Israel	September 2018	Completed
19	Ocean Swagman	Cattle to China	September 2018	Completed
18	Jawan	Cattle to China	August 2018	In progress
17	Gloucester Express	Cattle to China	August 2018	Completed

(Figure sourced from <http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/independent-observations-livestock-export-sea#2018> 23/9/2019.)

7. The department’s management and use of reports to increase community and industry confidence in the effectiveness of its regulation in achieving the objectives of the legislation.

The objective of the legislation is to ensure the welfare of the animals undergoing live export. This requires that appropriate standards are in place, as well as appropriate monitoring, reporting and effective enforcement of compliance. Regular review of the standards to ensure they meet community expectations is also required. There remains significant scope for improvement in each of these areas.

As stated in our [submission](#) on the *Review of the Australian Standards for the Export of Livestock (ASEL) - Working Draft – Reformatted Standard, 30 October 2018*:

“There are some recommendations and proposed changes to the draft standards that the AVA supports. However, overall, the AVA is disappointed in that many of the proposed changes are minimal and insufficient to avoid adverse welfare outcomes. Many of the science-based recommendations made by the AVA in our submission to the [ASEL Stage 2 Issues Paper](#) have not been incorporated into the new draft standards. We

believe that this minimalistic approach to reform of ASEL will not achieve the improvements necessary to safeguard the welfare of exported animals.”

Transparency and timeliness of reporting by the Department is also an area for improvement. As stated above at (2) and (6), there has been significant delay in release of Independent Observer (IO) Report Summaries, and those which have been released are not sufficiently detailed to determine compliance with legislation or to comprehensively assess animal welfare outcomes. For this reason, the AVA has been disappointed that IO reports were not released proactively and in full, and instead only became available following a third-party FOI request.

8. The cost effectiveness to government and industry of monitoring and reporting requirements.

This is outside the scope of the AVA’s response.

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