



23<sup>rd</sup> of September 2019

Mr Ross Carter  
Interim Inspector-General of Live Animal Exports  
Australian Government Department of Agriculture  
GPO Box 858  
Canberra ACT 2601

### **Monitoring and Reporting During Livestock Export Voyages**

Dear Mr Carter

The Pastoralists and Graziers Association of WA (Inc) (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions of Western Australia.

As a state farming organization, the PGA has a genuine interest in effective regulation of live export voyages.

The PGA has no direct involvement with the roles and responsibilities of persons directly responsible for managing and reporting of animal welfare issues during a voyage.

However, the Commonwealth Department of Agriculture publishes Independent observer reports on the “Independent observations of livestock export voyages by sea” web page. The PGA has examined these reports and makes the following observations.

A total of 126 summary voyage reports from April 2018 until May 2019 have been published on this web page.

The PGA notes that the web page contains the following trigger warning “Discretion advised: These reports contain images which may be distressing to some viewers”.

The PGA has examined every completed summary report from 2018 and 2019 and looked at the representative photographs. Voyage 52 contained no images, otherwise, with the exceptions listed below, every image is captioned ‘no issues’.

- Voyage 4 in 2018 shows an individual sheep panting.
- Voyage 7 in 2018 shows a sheep in a pen open mouth breathing.
- Voyage 10 in 2018 has no captions.
- Voyage 22 in 2018 shows the engine exhaust intake in hold 3.

#### **Pastoralists & Graziers Association of Western Australia (Inc)**

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- Voyage 26 in 2018 shows an image of wet pad conditions.
- Voyage 40 in 2018 shows two images of wet pens, and another after pen washing.
- Voyage 56 in 2018 shows an image of water in a pen, and another, cattle in a pen.
- Voyage 123 in 2019 shows two images with one sheep each of open mouth panting.

In fact, there are no disturbing images, and this out of 312 images.

Consequently, the trigger warning is disingenuous and must be removed.

Further, the PGA points out the absurdity of the captioning. Pens will have water in them if they are washed out, and breathing and panting does require the mouth to be open.

The PGA also questions the amount of time taken to complete the reports.

72 reports, or greater than half, remain in progress, the majority from 2019. Voyage 18 from August 2018 remains in progress, over a year later.

During 2018 the fastest completion date was 5 months with the longest taking a staggering 13 months. The average time was 8.6 months.

This does not include reports in progress. Doing so would increase the average completion time yet again.

There appears to be no logic with respect to species, destinations, time of year, or vessels, as to how reports are prioritised for completion.

For these reports to be of any value to anyone, they have to be delivered in a timely manner, and give some indication of hazard controls and risk management for each voyage so that lessons can be learned.

Unfortunately, a casual reading of the summary reports reads like a travelogue with animals. The PGA questions the value of the reports.

According to the Commonwealth Department of Agriculture, one of the core elements of its compliance strategy is to make it as easy as possible for exporters to meet their regulatory obligation.

Independent observers are an impost on the live export industry that add cost and complication to their business model. Considering the content of the report, and the time that is taken to hand them down, they do not assist livestock exporters to meet their regulatory responsibilities. This is not the definition of easy.

The PGA believes that Independent observers have fulfilled their role in providing additional assurance of the effectiveness of exporter arrangements in managing animal welfare.

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Yours Faithfully

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

Chris Patmore

Chairman  
PGA Livestock Committee

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