



The veterinary voice in animal welfare

Inspector-General of Animal Welfare: Consultation Paper Submission from Sentient, The Veterinary Institute for Animal Ethics

Sentient is an independent Australian veterinary association dedicated to animal welfare advocacy. Our members are represented in academia, private practice (companion, equine and large animals), non-government, government and industry settings, with expertise in many fields including animal welfare, animal behaviour, clinical medicine, epidemiology and the use of animals in teaching and research. A number are qualified specialists in particular disciplines or have extensive experience within industries such as live export, horse racing and greyhound racing. Sentient has presented at international and national conferences, published papers, contributed numerous submissions to state and federal government inquiries, and provided evidence at parliamentary public hearings. We also host final year veterinary science students for Public, Industry and Community placements in animal welfare advocacy. Sentient is registered with the Australian Charities and Not-for-profits Commission.

Considerations for establishment of the IGAWLAE

Additional animal welfare related objectives

1. What animal welfare objectives related to livestock exports would be most valuable and why?

We submit that live export can never be made safe for animals due to factors that will always remain out of the industry's control, such as the inherently stressful nature of long-distance transport for livestock, the risk of heat stress, unpredictable weather and sea conditions and the inability to prevent cruel handling and slaughter practices in countries of destination. While the trade continues, Sentient supports the aim of increasing accountability and transparency around the reporting of animal welfare breaches relating to livestock exports. The most valuable welfare objectives are those that reduce both mortality and morbidity levels, whether through direct intervention or prevention of harm to further animals by identifying exporters who breach animal welfare standards and permanently disqualifying them from further voyages.

Sentient advocates:

- Live sheep exports to or through the Middle East be prohibited in May and October to further reduce the occurrence of heat stress, for which there is no acceptable level;
- Mandatory automated monitoring of indicators such as temperature, ammonia or CO₂ levels. Heat stress remains one of the major animal welfare risks, so a guide for all those responsible for assessing animal welfare (stockpersons, accredited veterinarians and

independent observers) during voyages must be implemented. The full reporting of the extent and duration of heat stress should be included in all reports as well as the effectiveness of actions to mitigate heat stress.

- Veterinarians to be present on all live export ships. Ideally, they should be appointed independently rather than being contracted by the exporter or by the Department of Agriculture, Fisheries and Forestry (DAFF).
- Independent observers (IOs) to be present on all voyages;
- Publication of full, unredacted IO and accredited veterinarian reports on the Department's website;
- Mortality reports to include deaths in quarantine following journeys, as this is a more accurate indicator. SAFE in New Zealand¹ reported that information obtained via Official Information Act requests showed that ten times more cattle die shortly after live export voyages compared with during the journey. This data is not captured when mortalities only between loading and unloading are recorded.
- Significant penalties for ESCAS non-compliance. We could list multiple examples of non-compliance, but common and easily prevented ones include sheep being loaded with wool or hair over the maximum requirement of length in millimetres, exposing them to higher risk of heat stress and the loading of late pregnant ewes who deliver lambs onboard.²

2. What other objectives related to livestock exports could be considered within the scope of the IGAWLAE's work?

A key role for the IGAWLAE should be to identify animal welfare objectives during the Federal Government's planned phase-out of live sheep exports. This will be critical to the success of the phase-out and Sentient submits that a consultation process around this should commence immediately. The IGAWLAE should not focus its limited resources on the issue of new and emerging live export markets. New Zealand will cease all live exports of cattle, deer, goats, and sheep from 30 April 2023. There is no ethical justification for Australia to continue to export livestock by sea when the industry has been fraught with poor regulation and animal cruelty. Producers should be supported to focus on alternative sources of revenue such as exporting chilled meat products.

¹ <https://news.fuseworksmmedia.com/7ba0a6ec-4532-422d-873c-f2f0cd1e9950>

² [VALE News February 2023 \(campaign-archive.com\)](https://www.vale.com.au/news/2023/02/campaign-archive)



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3. How should the objectives related to livestock exports be prioritised (if not all could be included)?

We believe key priorities should be to reduce the risk of heat stress as much as this is possible, introduce severe penalties for ESCAS breaches and assist with the planned phase-out of live sheep exports. The traditional focus on mortality rates sets a very low bar for addressing animal welfare.

4. What animal welfare information related to livestock exports would be valuable to be included in reports to the Parliament? Inspector-General of Animal Welfare: Consultation Paper Department of Agriculture, Fisheries and Forestry

Full reports from independent observers and accredited veterinarians, heat stress data, mortality rates, high mortality voyages and non-compliance with ASEL and ESCAS. Sentient has submitted at least 2 FOI requests to the Department that were rejected on the grounds this would create “too much work”. Our requests were in relation to high mortality voyages, and hence, were submitted in the spirit of identifying non-compliance with ASEL.

5. What animal welfare information related to livestock exports would be valuable to be published on the department’s website?

As for question 4.

Structure of an IGAWLAE and inclusion of additional animal welfare expertise

6. Considering the objectives of the IGAWLAE, what experience, skills and capabilities would be desirable in recruiting animal welfare expertise/staff into the office?

We submit that the Department should only appoint veterinarians who hold post graduate qualifications and/or have specific work experience that ensures they have a sound understanding of the complexities of animal welfare science. At the very least, all Department veterinarians should have completed Australian and New Zealand membership examinations in animal welfare.

General comments

Sentient advocates the establishment of an independent office of animal welfare, a national body that oversees animal welfare by setting consistent and evidence-based standards that must be enforced in all animal industries, including live animal export. Our concern about the office of the Inspector-General of Animal Welfare and Live Animal Exports is that, despite the proposed expansion to include welfare standards for exported livestock, the Inspector-General is appointed



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by the Minister, leaving the potential for a conflict of interest that may impede the uptake of the Inspector-General's recommendations. We are not aware of any significant improvements in transparency of reporting by DAFF on key welfare indicators since the Inspector-General of Live Animal Exports (IGLAE) office was established, or of any fitting sanctions for major non-compliances by exporters with both the Australian Standards for the Export of Livestock (ASEL) or with ESCAS (Exporter Supply Chain Assurance System).

It is particularly concerning that the system of independent monitoring of live export voyages by the presence of IOs has not been fully restored since the COVID-19 lockdowns, with evidence from Senate Estimates that only five IOs were sent on ships between May and September 2022, despite 38 voyages being eligible.³ Of further concern, the Department does not publish the full reports of independent observers on live export voyages; these are published in summary format and the content has at times been inconsistent with actual reports obtained under Freedom of Information legislation⁴, such as regarding the occurrence of heat stress, a serious welfare issue in live sheep exports.

As outlined in our 2020 submission⁵ to the Implementation of Moss Review Recommendations, the Department has not adhered to Recommendation 4, which is to "take steps to have the ASEL prescribed as regulated standards, with appropriate penalties, for the purpose of strengthening the regulatory framework and encouraging compliance". Such compliance has been blatantly flouted. We need only refer to the exemption the Department granted to allow the AI Shuwaikh to sail with double-tiered versus single-tiered decks post the new single-tier standard introduced in 1 January 2020. This target date was suddenly reset to 2023. Granting exemptions to non-compliant vessels makes a mockery of the Department's stated commitment to improve conditions for animals on live export carriers. There is ample scientific evidence for increased suffering of sheep on double-tiered vessels due to reduced ventilation and poor air quality, regardless of stocking density, increased risk of injuries and reduced ability to visually monitor the animals. Another glaring breach of ASEL was allowing the AI Kuwait to sail after the summer prohibition introduced on 1st May, despite scientific evidence that this placed the sheep at increased risk of heat stress, heat stroke and death. Concerns expressed by animal organisations about the fate of these sheep were later confirmed with reports that thousands of animals suffered from heat stress.

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³ [Live exports: just five of 38 eligible ships had Australian animal welfare observers | Live exports | The Guardian](#)

⁴ <https://www.vale.org.au/io-reports.html>

⁵ [sentient.pdf \(iglae.gov.au\)](#)