



Inspector General of Animal Welfare Consultation

Submission of the
Australian Veterinary Association Ltd

March 2023

The Australian Veterinary Association

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry, research, and teaching. Veterinary students are also members of the Association.

The AVA thanks the Department of Agriculture, Fisheries and Forestry for the opportunity to comment on this important issue.

Executive summary

The AVA supports strengthening of the current live animal export regulatory framework, and independent oversight of this. To this end the AVA supports the role of the Inspector General of Live Animal Export. The proposal to expand this role across broader aspects of animal welfare (to create an Inspector General of Animal Welfare and Live Animal Export) is also generally supported, however it does not appear to extend beyond aspects of live animal export. In light of this restricted scope, we have set out our submission in two parts: Part A has the direct responses to the questions posed in the discussion paper about the (currently) proposed scope of the IGAWLAE role, suggesting additional objectives and priorities for this office; Part B of our submission sets out our vision for a broader independent expert body for national animal welfare coordination and oversight.

PART A

Role of Inspector General of Animal Welfare and Live Animal Exports (IGAWLAE) – based on current proposed scope of role and relevant questions set out in consultation paper.

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

Modern animal welfare science relates to both the physical and mental state of an animal, and recognises the sentience of animals. As such, animal welfare objectives for live export must go beyond the traditional monitoring and reporting of mortality rates; the objective must be to safeguard the welfare of animals throughout the live export process.

Reportable Mortality Rates (RMR) are a crude way of assessing welfare: an arbitrary threshold percentage is artificial, does not reflect suffering (morbidity), and a different approach is warranted. There has been a prolonged history of recommendations against the sole and simple use of the percentage-based measure:

- Perkins, McCarthy *et al*, 2015 identified and recommended a mortality incident rate be used to account for time-at-risk and allow useful statistical methods for analysis;¹

¹ Perkins, N., O'hara, M., Creeper, J., Moore, J., Madin, B. & McCarthy, M. 2015a. Identifying the causes of mortality in cattle exported to the Middle East. W.Liv.0252 In: Meat And Livestock Australia (ed.). Sydney.



- In his 2018 Review² McCarthy recommended: *“that the industry moves away from using mortality as a measure to a focus on measures that reflect the welfare of the animal”*;
- Similarly, in their Final Report³, the Heat Stress Risk Assessment (HSRA) Technical Reference Panel stated: *“mortality is an insufficient indicator of animal health and welfare, given that animals may suffer and have reduced welfare without actually dying, and that mortality levels may represent the ‘tip of the iceberg’ in terms of impacts on animal welfare”*.

As such, the industry and regulator need to ensure useful animal welfare measures of morbidity are collected. These animal welfare measures, and how regulatory decisions are made based on each welfare measure, must be made available in a transparent manner.

In the AVA’s response to Stage 2 of the Australian Standards for the Export of Livestock (ASEL) Review, 2018, we set out requirements for recording and review of morbidity and mortality data on each voyage, including a list of welfare indicators that should be included in the daily voyage report, and recommendations around how these may be collected, collated and subsequently undergo independent epidemiological assessment and transparent reporting, with a view to making immediate, continuous and ongoing improvements to animal welfare on every future voyage. See Section 3.0 - Reporting and investigations – pages 6 – 11: [Stage 2 ASEL Review. AVA response to Stage 2 Issues Paper](#).

The AVA [Policy on Live Animal Export](#) calls for “defined animal welfare parameters and automated, digital data management systems to ensure standardised and consistent documentation of activities, accurate reporting, assist auditing of compliance with (ASEL), to facilitate detailed epidemiological analysis of animal welfare outcomes”.

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

The AVA broadly supports the proposed expansion of the IGAWLAE role outlined in the discussion paper with respect to additional oversight of the department’s activities (pages 3 and 4, listed dot points) to include: reviewing the role of the department in assessing and approving applications from exporters; and their exercise of powers with respect to investigations and non-compliances. We also support an expansion of public reporting to increase accountability and transparency.

The office of the IGAWLAE should review the way information is currently provided, including Independent Observer Reports, allegations of breaches in animal welfare standards, any investigations undertaken, the outcomes of these, and any sanctions taken. Currently only summaries are published – these may not be sufficiently detailed to determine compliance

² <https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/biosecurity/export/live-animals/mccarthy-report.pdf>

³ <https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/biosecurity/export/live-animals/hsra-technical-panel-draft-report.pdf>



with legislation or comprehensively assess animal welfare outcomes, and provide the community with the assurance it needs.

We encourage further development and implementation of technology to facilitate real time, automated, digital data capture to ensure standardised and consistent documentation of activities and accurate reporting of defined animal welfare parameters during all voyages. The resulting big data set must be used for detailed epidemiological analysis of animal welfare outcomes to inform science-based continuous improvements.

Triggers for investigation should be revised. In the AVA's submissions to the Review of ASEL we proposed that Notifiable Events should be triggered by a certain level of morbidity, not just mortality. Reporting based on morbidity would give rise to a great deal more data to allow future improvements to be put in place. Investigations should be automatically triggered by automated technology reporting environmental and animal welfare conditions, and by reports and comments made by the IOs and Australian Accredited Veterinarians (AAVs). AAVs have expert knowledge and significant experience in mitigating animal welfare risks on board vessels, and their feedback is essential to ensure continuous improvement. It is also critical that voyages are investigated at random to ensure rates are not adjusted to avoid investigation. See full discussion in: [ASEL Draft Revised Standards. AVA submission](#).

The work of the IGAWLAE should ascertain the extent to which monitoring and investigation by the department results in tangible changes including mitigation of risks to animal welfare during voyages. Many AVA members would support the role having a broader and more holistic oversight of the entire industry from farm to slaughter, and be less constrained in scope than is currently proposed. They feel that transparency and accountability are key to the industry maintaining its social licence.

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

The office of the IGAWLAE should prioritise objectives on a risk basis. High risk issues include: long-haul voyages; journeys into the northern hemisphere summer or any which cross the equator; vulnerable classes of animals; prolonged land transport prior to exportation; space allocation on board; ship infrastructure leading to higher reported instances of injuries, lameness, disease etc; mortalities and conditions at destinations; contingencies if animals cannot be unloaded at destinations; slaughter standards at destinations.⁴ Assess alternatives to live export for high-risk routes and destinations and “the development of effective cold chain facilities across all countries to facilitate the chilled and frozen meat export trade” ([AVA Live Animal Export Policy](#)).

⁴ <https://livecorp.com.au/report/2sjK8Ubg6eeceyCUsRc5h>



4. What animal welfare information related to livestock exports would be valuable to be included in reports to the Parliament?

Currently only summaries are published – these may not be sufficiently detailed to determine compliance with legislation or comprehensively assess animal welfare outcomes. Mortality is a crude and incomplete indicator of animal welfare, and as outlined above, represents only the “tip of the iceberg”. As mentioned above, automated, digital data management systems should be further developed and implemented to ensure standardised and consistent reporting of all morbidity on every voyage, and this must be made available to the parliament and public in a transparent manner.

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

- Morbidity data for every voyage.
- Breaches of ASEL or ESCAS.
- Any investigations of notifiable incidents in full.
- Corrective actions or sanctions implemented and the outcomes of these.
- All reports to Parliament in full.

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

Staff in the office of the IGAWLAE should be wholly independent and have capabilities in veterinary science, animal welfare science and epidemiology, and a good understanding of the live export industry. This will allow independent assessment of ship-board morbidity and mortality data, and continuous improvements based on animal welfare indicators.

PART B

The AVA has been calling for national leadership in animal welfare since the cessation of the Australian Animal Welfare Strategy (AAWS) almost a decade ago. We sincerely welcome the current government’s stated commitment to reinstate an Australian Animal Welfare Strategy, and urge the government to ensure any new such strategy is properly funded and established in such a way as to be sustainable in the long term.

One key aim of the former strategy was to bring a nationally consistent, science-based and rational approach to the development of animal welfare Standards and Guidelines. These provide an important mechanism for industry to demonstrate compliance and thus maintain domestic and international consumer confidence in Australian products

The AVA has long championed the concept of national animal welfare oversight by an impartial body which ensures independence of the science-base and RIS process used to establish the standards. Consistency of implementation across jurisdictions is also essential and to date, this has not been the case (see: Section 5.4, Productivity Commission’s report into Regulation of Australian Agriculture, 2017).⁵

⁵ <https://www.pc.gov.au/inquiries/completed/agriculture/report>



Federal coordination of states and territories

The AVA participated in the Productivity Commission's Review, calling for national consistency and improved resourcing and enforcement of animal welfare standards. The AVA also called for the establishment of an independent body or office at the federal level to provide federal leadership of the states and territories. This impartial office should include expertise in veterinary science, animal welfare, ethics and agriculture. One example we raised at the time was the [New Zealand Animal Welfare Advisory Committee](#) (NAWAC). In their final report, the Commission recommended that a mechanism be established to ensure separation between agriculture policy matters and farm animal welfare monitoring and enforcement functions (recommendation 5.2). Independence from the state Departments of Agriculture is desirable to remove real or perceived conflicts of interest and ensure continuing community confidence in the process. AVA supports the Commission's recommendation for the establishment of an 'Australian Commission for Animal Welfare' to coordinate national animal welfare policy and standards development, and to publicly assess the effectiveness of state and territory implementation and enforcement.

In conclusion, while the establishment of the IGAWLAE as outlined in the discussion paper is welcomed, the remit of this role is currently limited to live animal export. The AVA supports the expansion of the functions of the IGAWLAE but remains of the view that a broader body to provide federal leadership of states and territories and coordinate national animal welfare policy reform, is also urgently needed.

