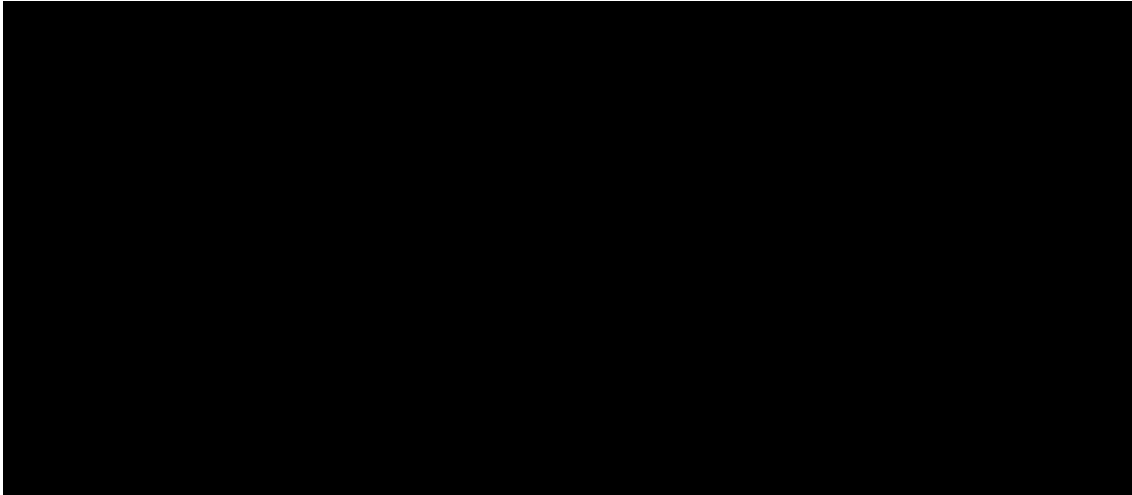
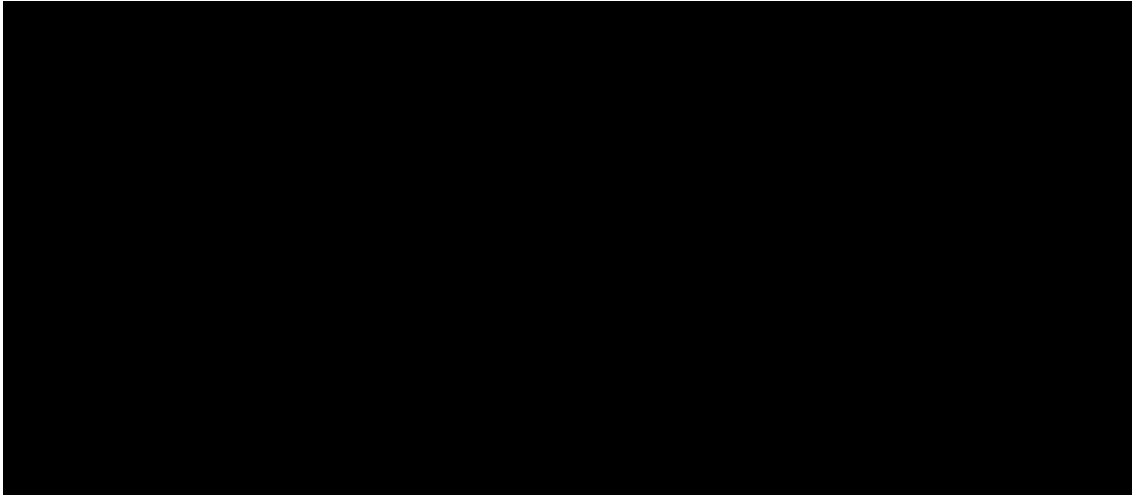
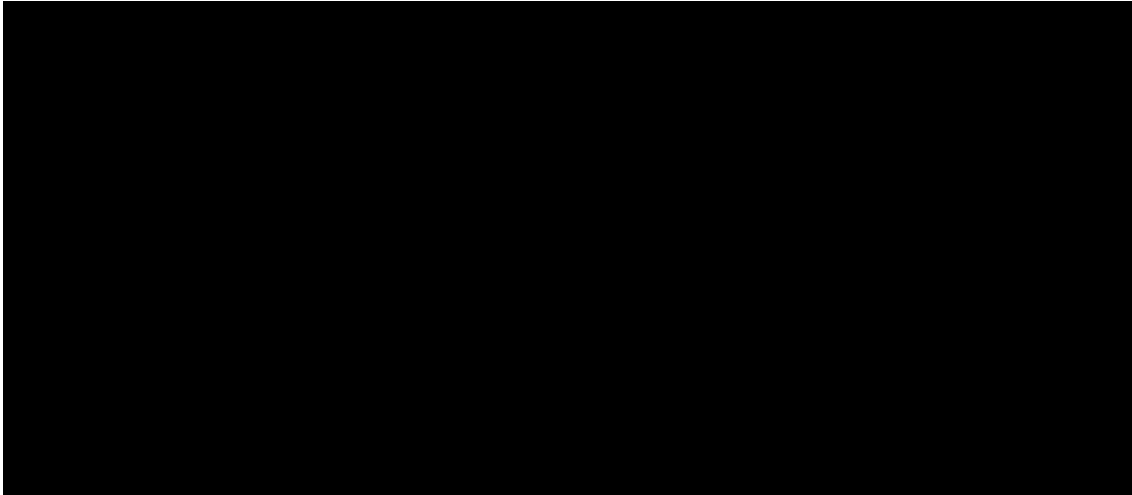
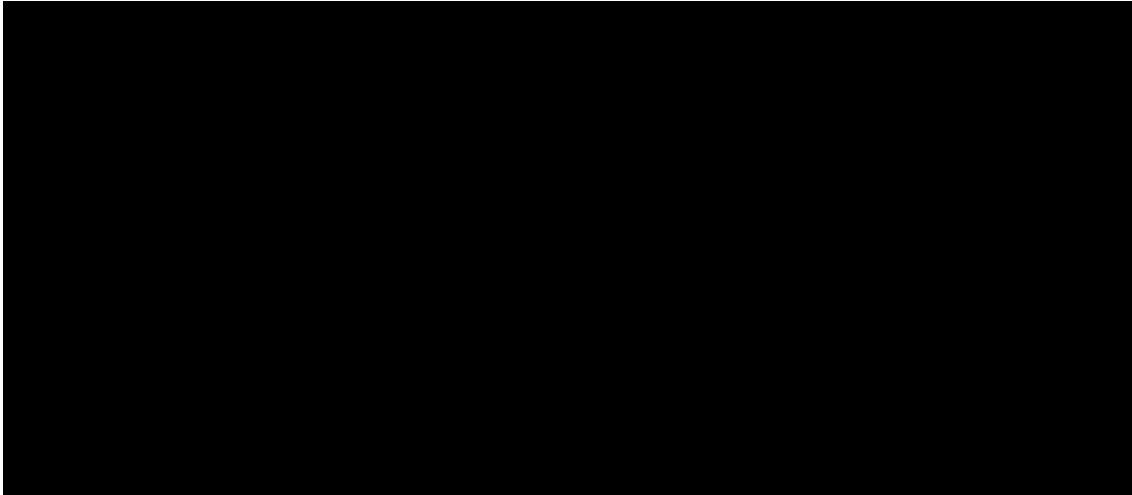
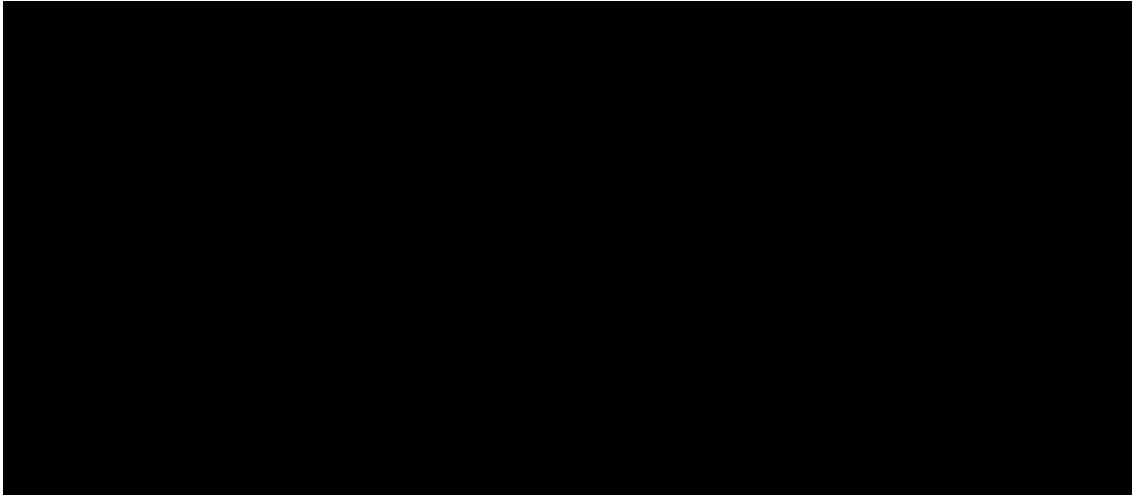


2<sup>nd</sup> April 2024

To: Mike Bond  
Inspector-General of Animal Welfare and Live Animal Exports.

**Comments on your review of the operations of Independent Observers.**

My background. I am a veterinarian with forty years professional experience:

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**This review will examine:**

- 1. how effectively the Independent Observer Program provides regulatory assurance on the transport of livestock for export by sea.**

My comments relate to voyages with sheep (plus 500 – 900 cattle) on voyages to the Gulf States over the past ten years. I have done cattle shipments to Russia and Mexico. Problems with cattle are usually with individual animals or as a disease outbreak rather than related to shipping conditions. Eye conditions were the main problem (12%) but we have eliminated



[REDACTED]

that problem. On one voyage (before Independent Observers) there was a major incident with 150 head dying (pneumonia) – no one from DAFF contacted me over the incident.

I started as a livestock voyage veterinarian in the mid-nineties with voyages from southern Australia to Egypt and Saudi Arabia. The main cause of death was *Salmonellosis* with full blown dysentery that was invariably fatal. Mid-voyage outbreaks of *Campylobacter* were common but were easily controlled once recognised. I have not seen any cases of dysentery or *Campylobacter* on voyages in the past ten years including two years and 2000 post mortems in Kuwait, and 15 voyages from both Australia and South Africa.

I have had an ‘Independent’ Observer on about eight voyages. Only one IO did two voyages. Two of these men resigned from DAFF and now work permanently, one as an AAV and one as a stockman on livestock ships. I have also had a South African veterinarian as an observer on a voyage from South Africa.

- I have seen no evidence that the IO program provided any regulatory assurance other than “we’re doing something” media output by DAFF. Every person I had as an IO was totally inexperienced in ship operations – that’s understandable – but they were also inexperienced in animal health, pathology, and animal behaviour and welfare.
- The first week of the voyage always included me conducting an induction, and routine orientation (understandable) but also teaching about animal behaviour and welfare, water supply and adaption, disease recognition, post-mortems and pathology – and the critical concept: air flow.
  - I will point out that every IO that I worked with was accepting, generally cooperative, and great to have on board. There were no personality clashes.
- Some IOs were particularly efficient at reading all the rules – but had little ability to adapt the application of the rule to changed conditions and reconstructions on the vessel.
  - In spite of repeatedly demonstrating the difference between the written rule and its application – no change to rules were ever made by DAFF after the IO report.
- When consistent / repeated problems were demonstrated to IOs, no remedial recommendations or action ever came from DAFF.

- Most IOs would show me a final report (assuming it was the one delivered): none was ever critical of the voyage – DAFF has never released media that reflected those reports.
- No operation on any vessel was changed because of any input from an IO. Ever.

The Independent Observer program was suspended during the Covid panic (not so for this AAV and Stocklady who were stuck in port in South Africa for 4 months). There was no noticeable changes etc on the vessel with their absence.

However, during this period, the IOs were replaced with a more intensive daily reporting system. That started as a bad joke but was eventually replaced with a bit simpler Excel spreadsheet. I did my last voyage three years ago – I have no knowledge of current reporting systems.

The major problem has always been that we report averages (as per DAFF). For example, deck pads are scored 1-dry/dust to 5-sloppy. One end of a deck (say 100 pens) may be score 1, another area score 5 – we would report Score 3. Just Bull---t. This was always explained to IOs, (and to DAFF) but no changes were ever made. The same averaging occurred with panting scores, and other notifications.

I developed a reporting system for the company [REDACTED] and for personal research projects. We looked at three randomly selected pens on each deck (n=30). Physical (feed / water available, % eating etc.) and observational (behaviour & welfare) data was recorded daily, at the same time, for both sheep and cattle by both myself and stockpersons. This information was used by myself, and some AAVs I trained, to make adjustments in feeding, stocking density, air-flow etc. Repeated reports to DAFF and LiveCorp on what we were doing went nowhere. Some IOs helped record the data????

A massive amount of required DAFF/LiveCorp data have been collected. Apart from the fact that much of it is misleading (as described above), as far as I know, no analysis of these data has been done – certainly not by DAFF or MLA. I understand LiveCorp does have someone at present who is having a “brief, time allowable, look...”.

My biggest, let’s say, amazement, is:



I have been doing the voyages to the Middle East over the past ten years. We have reduced mortalities from near 2% down to 0.2% - 0.4% over the twenty-five day voyage. That's less than the natural mortality rate of sheep in the paddock in Australia: measured as 'sheep deaths / year / 1000'.

- No one from DAFF, from LiveCorp, from MLA, has ever asked "what did you do?" No one. An amazing level of interest!

Indeed, we gave information on three operational problems we had identified, to an MLA/LiveCorp meeting of AAVs in Melbourne in 2017 (?). MLA took our suggestions: knew none of the details, never contacted us, and then gave research contracts to three others who also knew none of the details, who never contacted us (well almost) for those details— and delivered no final reports. The problems are still there.

## **2. the processes, policies and systems that support the department's Independent Observer Program**

Unable to comment other than that the people supplied range in experience with animal production. All have been very open to discussion and recognition of operations.

## **3. the department's risk-based approach to deploying Independent Observers**

Sufficient. Deployment should be delayed as late as possible so little warning to the vessel. Deployment should be commenced before a day or two before loading to allow the IO to observe animals at the feedlot, to understand any problems relative to the particular shipment – as with the recent cattle deaths from botulism on an Australia – Indonesia shipment. Animals died at the feedlot.

## **4. the potential use of alternative monitoring technology aboard ships**

Let's start by identifying what the problems we are trying to reduce really are. Are you looking for a solution to a problem that only exists in the media because of an occasional problem, or because of uneducated activist demands?

If we are going to identify a problem: by whom? What problems have past IOs reported, what problems have been gleaned from the daily reports (no analysis done); death are at a level that DAFF considers a non-problem.

Unknown by the general public, and never mentioned by DAFF / LiveCorp is that the *heat stress* problem on Gulf shipments, is a 36 hour problem that we now manage /avoid. Did you know?

Responsible media outlets. Do you also know, KLTT put an ABC camera man on Al Messilah last year for the entire voyage - Australia to Kuwait. The ABC ran about a 3-minute segment on Landline – and nothing on any news report. I had an ABC camera/journalist crew come on board during loading in Perth – they were given free range on the ship. In spite of the journalist’s comment of “no problem here”, nothing was shown on TV except an interview with Graham Daws manager of Emanuel Export and myself. Great media??

I have hundreds of hours of video, as do most IOs, taken as individual pens, walk-through video, and fixed position 24 hr video. Again, no one has asked for it. Even a previous Minister of Agriculture when I told him we had it – no interest. Does no one want a good story?

So: alternative monitoring – absolutely not necessary! Discussion of automatic monitoring of ammonia: ammonia is noticeable during loading days, disappears on the second day at sea, and is then noticeable about 24 hr after arrival in Kuwait. There is chemistry involved, not just sheep urine – has anyone considered that. We wear personal monitors – to my knowledge, they have never squealed a warning. Continuous temperature measurements are of similar value – that’s ‘of no additional benefit’. Don’t build ‘solutions’ before you know the measured problems and welfare correlation – the comments of people who have never been on a voyage are not necessarily beneficial. Investigate -yes, blindly apply – no.

**5. what, if any improvements, should be made to the current arrangements.**

Increase media reporting of facts - replying to activists with 20-year-old complaints and ...

[REDACTED]

Back-off from the mind-maps of people sitting in offices in Canberra. Listen and fully read their own IOs reports and read the daily and EOV reports of the AAVs. Pick up a phone could be good. The only phone calls I have ever had relate to “you did not fill in line 6 completely”, Wow.

**AAVs knowledge.** During May – July there are no voyages Australia – Middle East. How about the Inspector-General of Animal Welfare and Live Animal Exports setting up a meeting of all active and recent AAVs, that do those MENA ships and as many available AAVs from the long-haul cattle voyages. We are the people that actually know what is happening, what problems do actually exist, how to avoid them, how to respond, how can they be overcome etc. Include people from DAFF that are senior enough to be actionable, and from LiveCorp. Yes, there will be cost – most of us live a long way from Canberra (DAFFs usual ploy is to make AAVs pay their own way – so we don’t go – who misses out. Then again, I suppose there is no controversy DAFF has to deal with.)

The overall indicator of good welfare is: is the animal resting and chewing its cud: no problem. No spreadsheet measures and reports that – but everyone on the ship, Captain, crew, stockies and including AAVs and IOs, knows that to be true. As it is in Australian paddocks. One thing that is always overlooked is: the crew. They know what they are doing, most have done it for a long time – more than most AAVs, and all IOs.

My partner [REDACTED] agrees with my comments. I can supply contacts for other AAVs that would support my comments.

Thanks

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]