

Sentient:

The Veterinary Institute for Animal Ethics

Live Animal Export: Independent Observer Submission 2024

To Whom it may concern,

Thank you for conducting the review into the implementation and management of the Onboard Independent Observer program for Live Animal Exports and for enabling Sentient and others to participate.

Sentient is an independent Australian veterinary association and charity dedicated to promoting animal welfare and ethics. We believe veterinarians have a moral obligation to play a leading role in animal advocacy. Our mission is to bring the recognition of animal sentience to the national agenda and to advocate the humane treatment of animals as a priority wherever they are used or affected by humans.

The author of our submission, Dr Lynn Simpson, has been broadly involved in all aspects of the Live Animal Export by sea trade since 1999, including 3 years working as a Stevedore in Fremantle loading ships, many years working in feedlots and registered premises preparing animals for export by sea, accompanied 57 long haul voyages as an AAV, worked in international markets around feed-lotting and slaughter arrangements, contracted to both MLA and LiveCorp, as well as worked in both the regulatory branch of Live animal Exports and policy field of the Animal Welfare Branch for the Department of Agriculture in Canberra.

1, How effectively the Independent Observer (IO) program provides regulatory assurance on the transport of livestock at sea.

- When first introduced the IO program was met with strong approval by the broader community and was of great value in protecting animal health and welfare at sea.
- The public expected the extra oversight to relieve the often conflicted/captured (legally mandated by Government yet paid for by the exporter of the consignment being reported on) pressure on the onboard AAV. Pressures we know firsthand can cause minimalization of reporting or in worse scenarios complete fabrication of numbers and severity of events to suit the exporters records and reduce scrutiny and awareness from the Australian as well as International Governments- point in case would be the M.V Brahman Express only last week upon unloading in Indonesia and not reporting correct mortality numbers to the receiving authorities, 8 and 151 are not the same and whilst done assumably to prioritise animal welfare by avoiding a possible consignment rejection it is a clear example of how an IO or an AAV may have influenced a different diplomatic outcome.

- Many initial IO reports contained information that was clearly illuminating suspected issues to the Government such as the prolific presence of heat stress based on panting and behavioural observations as well as thermometer readings that often were taken at the hottest time of the day, not 10 am as is the general practice by ships crew to enable the information to be incorporated into the official 'noon report' all ships must send to the International Maritime Organisation. Whilst this practice is convenient for the ships management to meet international maritime reporting regulations, it allowed many exporters to conveniently or deliberately, obfuscate and deceive the actual maximum temperatures and humidity's being experienced by the animals onboard. The IO has access to this information freely with no time restraint as they wander the decks housing animals and this is an incredibly useful resource when retrospectively investigating mortalities or disease manifestations; especially if a voyage goes to reportable mortality levels.

2, The processes, policies and systems that support the Departments independent Observer (IO) program.

- There does not appear to be any easily found transparency on the details of the policies or systems used by the Department for the IO program. Clarification on these policies and systems would be welcomed. If there is a framework it appears to have been eroded over time as there are so few IO reports available recently and many have been sanitised to the point of making the program almost redundant unless it is to be assumed that the reports were too damaging to the exporter or IO to be released publicly- if so, simply highlighting that this report is under investigation may be helpful.

3, The Departments risk based approach to deploying Independent Observers (IO).

- As with question 2, there is little if any official information readily available to enable thorough analysis of any risk-based policies.
- The risk could be considered multiple ways;
 - a) Personal risk to the IO, such as Pirates or Houthi missiles, or heat stress injury from going through areas notorious for extreme temperatures such as the Gulf of Aden / Straits of Hormuz on voyages sailing immediately after the Northern Summer moratorium is lifted and the Middle East is still reliably experiencing extreme summer temperatures?
 - b) Risk to exporters licences/ Departments resources, of uncovering poor practice on vessels that are questionable performers either by design or management deficiencies/ issues?
 - c) If it is too risky to send an IO, it must be too risky to send live animals.

4, The potential use of alternative monitoring technologies onboard ships.

- The use of CCTV in live time would be useful, even if just logged for 5 minutes per hour to reduce reviewing time by the Department, but likely impractical for maintenance and reviewing.

- Data loggers measuring temperature, humidity and ammonia should be standard in my experience as especially during investigations into high or questionable mortality numbers the loggers may have detected times/patterns of increased heat and humidity that fall for example at night/unattended decks. The loss of many sheep suddenly to heat stress at night is quite common but poorly reported on as during the night there are usually only one or two night watchmen wandering the decks primarily looking for water leaks from troughs. They do not always notice the 'tipping point' of heat development and increased deaths over periods that may only be several hours long- not the multiple extreme days as seen on ships such as the Awassi express- most heat stress incidents fall over a few hours only, and not uncommonly at night. Of course the AAV, IO and stock people would most likely be asleep at this time unless alerted and woken.
- Monitors such as data loggers could also help identify areas that are higher risk of heat build up with insufficient ventilation or to help identify fan breakdowns or poor performance.

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

- Policies, Processes and Risk based approach information should be made transparently available to enable this question to be answered more efficiently, however;
- high risk ships such as ones with a history of higher mortalities should have IO's on board as a priority.
- High risk voyages in times of well known increased heat risk such as immediately after the moratorium is lifted each year should have IO's on them as a priority.
- Exporters should be encouraged not to try to garner favour with IO's by offering enticements such as expensive alcohol gifts, access to higher quality hotels than originally proposed or to offer services such as paying for prostitutes in destination countries. This trade has a verbal grapevine bigger than the average vineyard and these events do not go unnoticed. Likewise, IO's should be encouraged to decline such attempts to garner their favour.
- The Department should realise that ships who routinely claim there is no room for an IO are most likely able to find space if they wanted to. This is a very obvious excuse for most vessels trying to avoid observations.
- The IO reports have become weakened, sporadic or sanitised beyond use- please rectify the robust nature of the initial program to regain any value in the program.

There is much valuable and life saving information to be attained from a strong, reliable and robust IO program in the live trade by sea.

Please do not hesitate to contact Sentient or the author for any further details.

Sincerely

Dr Lynn Simpson and Sentient: The veterinary institute for animal ethics
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