

Date: 27 September 2002

To: Secretary

REPORT OF AN INSPECTION OF KOBO AND CAPE NELSON FEEDLOTS PORTLAND,
AND MV AL KUWAIT

Purpose

Further to the detailed verbal advice I have provided to you,:

1. to provide information and observations obtained from a field inspection of Kobo and Cape Nelson feedlots at Portland, and the MV Al Kuwait, 25-26 September 2002.
2. to suggest an approach for a review of the AQIS Direction preventing the export of 50,000 sheep assembled at the feedlots.
3. to recommend a review of the live animal export program.

Background

On Friday 20 September 2002 the AQIS Executive Director issued a Direction under clause 10(c) of the Export Control (Animals) Orders, that an export permit should not be issued to Rural Exports and Trading WA (RETWA) for a proposed export of approximately 50,000 sheep prepared at Kobo and Cape Nelson feedlots Portland. The export was scheduled for Monday 23 September 2002 on the Al Kuwait.

On Monday 23 September RETWA through their lawyers requested that you review the decision. You requested that I inspect the sheep, feedlot and Al Kuwait with the following terms of reference:

1. To provide information on the current condition of the sheep, feedlots and vessel;
2. To advise you how preparation of this consignment differs from the preparation of three previous RETWA consignments which experienced reportable mortalities;
3. To advise how RETWA has acted relative to a list of criteria sent to RETWA by Minter Ellison on 23 September 2002;
4. To advise whether this consignment conforms to clauses 8(d) and 8(e) of the Export control (Animals) Orders).
5. To examine actions of RETWA which caused the health or condition of animals to deteriorate during previous export journeys

Inspection team

I assembled the following team to assist in the inspection:

Assoc. Prof David Adams	Science advisor to CVO
Prof. Ivan Caple	Dean, Faculty of Veterinary Science, Melbourne University
Mr Hugh Millar	Chief Veterinary Officer, Victoria
Mr Martin Holmes	Manager Animal Programs, AQIS
Mr Denis Hayes	AQIS Senior Livestock Veterinary Officer, Melbourne

At my request AQIS provided a dossier of background information (Attached).

Field inspection

The team inspected the sheep and feedlots on Thursday 26-27 September 2002. All sheep in all paddocks in both feedlots were inspected.

The team (with the exception of Mr Holmes) inspected the vessel on Friday 27 September 2002.

The inspection team had discussions with staff at both feedlots, the QA manager of the feedlot, the accredited 3rd party veterinarian and with the Master of the vessel

Considerations

1. The current condition of the sheep, feedlots and vessel

- the sheep are split between the 2 feedlots; 39,600 older sheep are at Kobo and 15,200 younger sheep at Cape Nelson.
- mobs were observed at rest, eating and while being moved. All corners and fence lines of paddocks were examined for presence of sick sheep; none were found.
- in general the sheep are in excellent health. They showed no abnormal behaviour. The consistency of faeces indicated there is no evidence of widespread intestinal disease.
- the number of lame sheep was estimated to be less than 0.1%, and these sheep can be readily selected for culling. We observed 2 animals ~~lost~~^{out} of 50,000 with soiled breeches and 3 with pinkeye.
- the great majority of sheep seem to be feeding well. Several lines of the older wethers are in particularly good condition. One line of C wethers has a number of hollow-flanked sheep indicating poor feeding and one line of lambs is of variable quality. These sheep should be able to be readily selected for culling.
- mortalities have been low.

Daily mortalities

September →	16	17	18	19	20	21	22	23	24	25	26
Kobo	0	0	0	1	0	2	2	6	7	8	9
Cape Nelson	0	1	1	1	1	0	2	0	0	0	0
Daily total	0	1	1	2	1	2	2	6	7	8	9
Cumulative	0	1	2	4	5	7	9	15	22	30	39

- the feedlot ground surface is generally firm due to recent dry conditions, absence of scour in sheep, and hay feeding directly onto the ground;
- the sheep are in average 3-5kg heavier than the previous shipment, food consumption has been higher and the preparation in transition from a paddock diet to a ship-board diet has been adequate.

Feed consumption

Feedlot	Sheep numbers	Feed consumption
Kobo	39,000 sheep	166.65 tonnes hay 355.17 tonnes pellets = 1.25kg/day
Cape Nelson	15,200 sheep	96.07 tonnes hay 129.47 tonnes pellets = 1.3kg/day

- weather conditions have been very benign for the 10 days sheep have been in the feedlot, but the weather seems to be turning more windy and wet. Shelter in the feedlots is patchy and there is no provision for simultaneous shelter and feeding, so that sheep are likely not to feed when sheltering during bad weather.
 - the team inspected all deck of the vessel, paying particular attention to decks 1 and 7
 - the ship was in very clean condition. The feeding and watering arrangements seem very satisfactory. During the day 3 crew members supervise each deck and there is also a roving team at night. The team questioned the Master on the issue of risk of mortalities on this voyage with respect to position of stock on the ship and climatic conditions. He replied that this would vary according to the circumstances of the voyage and the condition of the sheep. He anticipates a good crossing of the Bight if he can sail within 2 days, particularly if he takes a northern route.
2. *How does preparation of this consignment differs from the preparation of three previous RETWA consignments which experienced reportable mortalities?*
- a) we were informed that the sheep were sourced from regions closer to the feedlot, so there was less land transport and associated stress on delivery to the feedlot.
 - b) the sheep were split between the 2 feedlots. One (Kobo) was completely emptied of sheep before this consignment.
 - c) the sheep were prepared for export in the feedlot for a 5 day feedlot program. It would appear preparation time for previous consignments was 2-3 days in the feedlot.
3. *How has RETWA has acted relative to a list of criteria sent to RETWA by Minter Ellison on 23 September 2002*
See Attachment 1
4. *Does this consignment conform to clauses 8(d) and 8(e) of the Export control (Animals) Orders)?*
- the general condition of the animals is good;
 - the animals do not appear to suffer from any overt significant infectious disease;
 - the accommodation on the vessel (Al Kuwait) is adequate for the health and welfare of the animals;
 - no animals of other species are to be carried on the vessel;
 - on advice from Simon More the animals are likely to encounter conditions of high heat during the journey. For this reason, the animals should be loaded at the lower SLEP stocking rate;
 - we have been advised by AQIS the animals have been handled in accordance with relevant National Standard and Codes of Practice;
 - the nature and equipment of transport to the place of export (stock transport trucks) is adequate. No animals of other species will be transported with this consignment;
 - the journey to the place of export is approximately 4km. Transport of animals is likely to be accordance with Model Code of Practice for the Welfare of Animals: Road Transport of Livestock;
 - loading equipment is adequate and there is minimal risk of animals being injured by enclosures or ramps.

In conclusion, this consignment conforms with clause 8(d) and 8(e) of the Orders.

5. *Examine actions of RETWA which caused the health or condition of animals to deteriorate during previous export journeys*

I have reviewed the outcomes of AQIS investigations into the previous 3 RETWA voyages:

Voyage	Date	Mortality
Al Shuwaikh	1/9/02	3.0%
Al Messilah	6/8/02	2.82%
Al Shuwaikh	18/7/02	6.75%

The absence of an adequate official reporting system makes it difficult to diagnose with certainty the cause of reportable mortalities on previous voyages. What evidence there is available indicates that contributory factors were:

- ✦ weather conditions at the feedlot and lack of shelter feedlot to provide shelter for sheep during poor weather;
- ✦ inadequate preparation time in the feedlot; for example, in the preparation of 76,000 sheep for the Al Shuwaikh, 217.15 tonnes of pellets and 227.28 tonnes of hay were fed. This equated to less than 1kg/head/day.
- ✦ undiagnosed enteritis at sea;
- ✦ weather conditions in the Middle East;
- ✦ unloading patterns in the Middle East which could have contributed to 2/3 to mortalities in the port.

In the case of the proposed export consignment, differing factors have been:

- ✦ better weather at the feedlot;
- ✦ evidence of adequate adjustment to pellet feed at the feedlot, in particular a longer preparation time;
- ✦ no clinical evidence of enteric disease;
- ✦ the Al Kuwait has had a satisfactory record in terms of mortalities over the last 12 months.

RECOMMENDATIONS

1. That you note that this proposed consignment conforms in our view and on the basis of evidence presented and examined, to clauses 8(d) and 8(e) of the Orders, and is suitable for export; we would suggest however that the following caveats apply:

- ✦ further rigorous selection and culling under supervision of AQIS is required at final inspection before export;
- ✦ the consignment should be subject to SLEP stocking densities, i.e. approximately 15% below normal stocking densities;
- ✦ as suggested by RETWA, Dr Simon More should accompany the vessel to Fremantle but should submit a report at the end of the voyage segment to the Australian Chief Veterinary Officer according to a protocol for observations that will be developed;
- ✦ a SLEP-accredited veterinarian should accompany the vessel between Fremantle and its destination and submit a detailed report on the voyage including observations on behaviour, morbidity and daily mortality rates by class, pen and position on the ship, wet bulb temperatures, climatic conditions; AQIS will provide the reporting proforma for submission to the Australian Chief Veterinary Officer.
- ✦ despite these precautions, there can be no guarantee that any export consignment will not experience high mortalities due to either animal disease, or adverse weather.

- discussion with company QA indicated that despite his experience of 45 voyages, he cannot predict voyage mortality rates, although he does not expect mortality to exceed 1.5%
 - risk assessment carried out for this voyage should be routinely carried out by industry for all voyages.
2. As a result of this investigation the review team sees a need for a full risk analysis of all aspects of the trade. Identified elements of risk include sources and conditions of stock, preparation of feedlot standards, and special weather conditions. We recommend such a review would also include examination of regulatory arrangements; quality management in the industry; and management of reporting arrangements.



Gardner Murray
Chief Veterinary Officer
Executive Manager, Product Integrity Animal and Plant Health

ASSESSMENT OF CRITERIA FOR EXPORT OF SHEEP CURRENTLY ASSEMBLED AT PORTLAND

27 September 2002

Criterion	Response from RETWA, Simon More & 3 rd party veterinarian	Difference from previous voyages	Suitability for export?
Selection of sheep Origin	Vic: 39,700 SA: 8,800 Riverina NSW: 4,200	Sheep sourced from less far afield	Yes, subject to culling at final inspection
Sex	Wethers 49,100 Rams 2,100	No difference	Yes
Age	Wethers/rams 45,600 Lambs 5,600	Information not provided	Yes
Breed	Wethers & rams: not stated Lambs: Merino	No difference	Yes
Weight	B wethers average 53kg	3-5 kg heavier	Yes, subject to culling at final inspection
Conditions of transport from farm of origin to Portland Means of transport	Not stated	Transported by road; presumably no difference apart from lesser distance	Yes
Duration of journey	Not explicitly stated; the source area avoided selection of 'long distance' sheep	Implied that the trucking distance was less	Yes

Criterion	Response from RETWA, Simon More & 3 rd party veterinarian	Difference from previous voyages	Suitability for export?
Management of the sheep at the Portland feedlots Length of time they have been at Portland	Arrived Mon. 16-Wed 18 September; therefore have been at feedlot 9-11 days (at 27 September)	Previous voyages had short feedlot periods (2-3 days)	Yes
Method of introduction onto pelleted feed	Graded regime of reducing hay, increasing pellets	Longer adjustment period	Yes
Feeding behaviour since arrival	Fed enthusiastically; measured levels of intake of hay and pellets Prepared to increase hay if necessary	Longer period in feedlot	Yes
Animal health treatments (eg vaccinations, drenches)	Not stated Verbal advice from the 3 rd party veterinarian is that an anthelmintic was administered via the feed.	Worm egg counts being performed on 5 animals; result is < 100egg	Yes

Criterion	Response from RETWA, Simon More & 3 rd party veterinarian	Difference from previous voyages	Suitability for export?
Animal health whilst at Portland feedlots Incidence of diarrhoea/scour	Nil incidence	No difference	Yes, subject to final inspection
Mortalities	10 mortalities up to 22 Sep. General comment that the sheep are in excellent condition	Apparently lower	Yes, subject to continuing low mortalities
Proposed management of the sheep on the Al Kurait Loading density	Risk of heat stress is high, particularly on decks 1-3. The exporter proposes to load decks 1-3 at SLEP rates (15% less than normal ALES rates)	Al Shuwaikh was loaded at SLEP levels and suffered high mortalities	Recommend SLEP stocking rates for the entire consignment
Disease monitoring and management.	No comment	Increased monitoring due to split of consignment into 2 feedlots	Recommend Simon More accompanies voyage Portland-Fremantle for detailed examination of mortalities, collection of samples for laboratory work-up. Recommend SLEP veterinarian accompanies remainder of voyage.