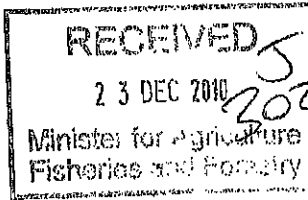




for all creatures great & small

Senator the Hon Joe Ludwig
Minister for Agriculture, Fisheries and Forestry
Parliament House
CANBERRA ACT 2600



22 December 2010

Dear Minister

Independent study into animal welfare conditions for cattle in Indonesia from point of arrival from Australia to slaughter, 2010 - Final Report

RSPCA Australia has been provided with a copy of the above report by the DAFF Trade and Market Access Division. The report, dated May 2010, documents the treatment of Australian cattle in Indonesia during a seven-day period in March 2010.

From the information available in the report it is clear that the majority of the animals observed (and likely the majority of animals exported) were subjected to significant levels of pain, fear and distress during their handling and slaughter.

The scale and significance of the animal welfare issues described in the report show that in terms of risks to animal welfare, the situation in Indonesia is equal to the Middle East. Given this, it is not a trade that the RSPCA believes should continue.

The report makes a number of recommendations and issues for consideration. A government and industry plan of action including timelines and resource commitments must be put in place immediately in order to implement each of these recommendations and to address the questions we raise in the attached RSPCA comment on the report. RSPCA Australia believes that both the report and action plan should be publically released urgently.

It is the way in which the majority of cattle were slaughtered that has shocked us. While the introduction of restraining boxes is offers some improvement on traditional slaughter methods, we are very concerned that Australian-driven developments have served to entrench practices that involve significant risk to animal welfare.

The attached RSPCA response to the report raises a number of important questions regarding the report itself and the MLA/LiveCorp animal welfare program in Indonesia, including:

- why the serious adverse nature of the evidence documented in the report is not adequately reflected in the report summary or the presentation of stronger recommendations
- why the report fails to document the risks to animal welfare posed by the restraint boxes installed under the MLA/Livecorp program
- why Mark I restraint boxes continue to be installed when their risks to animal welfare are well known and improvements to this design have been available
- why steps have not been taken to increase the use of stunning or examine the feasibility of restricting the slaughter of Australian cattle to those facilities using stunning.

RSPCA Australia Inc.
ABN 99 668 654 249
P 02 6282 8300
F 02 6282 8311
E rspca@rspca.org.au
W rspca.org.au

PO Box 265
Deakin West ACT 2600

The report also makes a number of recommendations pertinent to the terms of reference of the Livestock Export Standards Advisory Group (LESAG) which involve reviewing the appropriateness of exporting certain classes of cattle to Indonesia for slaughter. RSPCA Australia requests that the Report is forwarded immediately to LESAG so that these issues can be addressed.



Yours sincerely

Heather Neil

Heather Neil
Chief Executive Officer
RSPCA Australia

CC: Jo Evans, DAFF Trade and Market Access
Cameron Hall, LiveCorp
Michael Finucan, Meat and Livestock Australia
David Inall, Cattle Council of Australia
Luke Bowen, Northern Territory Cattlemen's Association

RSPCA Australia response to:

Independent study into animal welfare conditions for cattle in Indonesia from point of arrival from Australia to slaughter, 2010 - Final Report

General comments

This report was produced by Schuster Consulting for Meat and Livestock Australia (MLA) and LiveCorp. It summarises a collation of observations made by a panel of four individuals on a seven-day visit in March 2010 to the Indonesian islands of Java and Sumatra to observe the treatment of Australian cattle. The full details of all the facilities visited are not provided in the report, but they included the port of Lampung, six feedlots and eleven slaughter facilities. The panel observed a selection of Australian cattle at different stages from the point of arrival in Indonesia to the point of death.

Indonesia is the largest importer of Australian cattle and has held this position for 13 of the past 15 years. In 2009, 80% of total live cattle exports from Australia went to Indonesia: a total of 773,000 cattle at a rate of between 32,000 to 51,000 head per month. In the first quarter of 2010, 142,232 cattle were exported from Australia, unloaded at a number of Indonesian ports, dispersed to feedlots and subsequently transported to one of over 120 possible locations for slaughter. The report provides an outline of the treatment that these cattle will have received.

The report documents multiple problems with each stage of the transport, feedlot, handling and slaughter process, including the following:

Transport

- Lack of driver and handler training
- Lack of contingency planning
- Long-distance transport without provision for rest stops and access to food and water

Feedlots

- Lack of adequate roughage in the ration leading to acidosis
- Heat stress
- Poor manure management
- Inappropriate mixing of cattle
- Lack of handler training
- Inappropriate breeds (less than 50% *Bos indicus*)

Slaughter

- Lack of maintenance of restraint boxes
- Lack of SOP training and implementation in some abattoirs with restraining boxes
- Lack of effective and humane restraint prior to and during slaughter
- High variation in the competency of slaughtermen and handlers
- Lack of feed and water in abattoirs
- 'Washing' of animals when cast prior to slaughter
- Very limited use of stunning
- Poor slaughter techniques resulting in prolonged time until loss of consciousness

The picture that emerges from the report reflects a situation where the understanding of animal behaviour and animal welfare is limited, the quality of loading, transport, holding and slaughter facilities ranges from extremely primitive to relatively modern, training and competency of animal handlers is minimal, and animals are killed using inappropriate restraint and slaughter equipment.

It finds that the treatment of Australian cattle in Indonesia is highly variable. In the best cases, cattle that have been appropriately selected for Indonesian conditions and sent to larger, modern facilities may receive relatively good treatment, relatively short journeys, appropriate handling and a rapid, humane death using stunning prior to bleeding out. In the worst cases, cattle are subjected to poor handling, stressful conditions, several long and arduous journeys, and a slow, distressing and painful death.

The OIE Code Article 7.1.1 defines animal welfare in the following way:

"Animal welfare means how an animal is coping with the conditions in which it lives. An animal is in a good state of welfare if (as indicated by scientific evidence) it is healthy, comfortable, well nourished, safe, able to express innate behaviour, and if it is not suffering from unpleasant states such as pain, fear, and distress. Good animal welfare requires disease prevention and veterinary treatment, appropriate shelter, management, nutrition, humane handling and humane slaughter/killing. Animal welfare refers to the state of the animal; the treatment that an animal receives is covered by other terms such as animal care, animal husbandry, and humane treatment."

From the information available in the report it is clear that the majority of the animals observed (and likely the majority of animals exported) were subjected to significant levels of pain, fear and distress during handling and an inhumane slaughter. The welfare condition of the majority of animals can only be described as poor.

It is therefore both perplexing and extremely disappointing that the report takes the range of conditions observed and summarises them into one sentence: *'Animal welfare was generally good'*. RSPCA Australia does not believe that this is an accurate reflection of the information presented in the report. Furthermore, despite the report identifying a series of specific areas to target for improvement, the actual recommendations contained within the report are extremely weak.

While the report identifies issues in each step of the journey from arrival to death, the area which is of most concern to RSPCA Australia is the slaughter of Australian cattle. The following sections examine the findings of the report relating to slaughter and raise a number of questions in response to these findings.

Slaughter of Australian cattle in Indonesia

Installation of restraint boxes/SOP training

The report suggests that where training programs have been delivered in association with the installation of restraint boxes as part of MLA/LiveCorp/Australian Government programs, this has improved the treatment of cattle.

RSPCA Australia does not dispute the finding that the installation of restraint boxes when accompanied by training is likely to offer benefits over traditional handling practices. However, the report does not provide details or correlate information from specific observations to specific facilities visited, the type and model of restraint box being used, the amount of training implemented over what period of time, or whether any other infrastructure improvements have occurred at the facility as part of these programs in order to validate this conclusion.

RSPCA Australia is very concerned over the reported lack of adherence to the Standard Operating Procedure (SOP) in some abattoirs where restraint boxes have been installed.

We are also extremely concerned over the promotion of a restraint box design that entrenches ritual slaughter without stunning and fails to adequately reduce the risk of injury and distress prior to slaughter.

Restraint box design

The Report states that 15 APFINDO/MLA LiveCorp restraining boxes were observed in operation. Discussions with MLA indicate that these boxes were likely to have all been Mark 1 restraint boxes. This information is not included in the report, nor are any descriptions or images of the restraint boxes provided.

Information obtained from other MLA/LiveCorp reports is needed to understand the deficiencies in the design of Mark 1 Restraint boxes (Beere 2004, 2008; Stark 2010). Mark 1 boxes were first introduced into Indonesia in 2001 when four boxes were installed. According to the MLA, there are now 109 Australian-designed restraint boxes installed in Indonesia in more than 90 individual locations: almost all of these are Mark 1 (including 10 boxes installed in the 2009-10 financial year), two are Mark 2 and four are Mark 4 boxes which were installed in 2010. All of these designs of restraint box involve inversion (rotation) of the animal prior to slaughter.

Use of inversion prior to slaughter

It appears from the Report that all of the 26 cattle observed in restraint boxes were inverted prior to slaughter. Subsequent video footage shown by Professor Ivan Caple, a member of the Review Group, at a briefing for RSPCA Australia on the report, indicated that at one abattoir stunning was carried out in the standing position, ensuring that the animal was unconscious when it fell onto its side.

Inversion prior to slaughter is not specifically prohibited by the OIE Guidelines, however they do clearly state that this technique has the following implications for animal welfare:

- inversion stress
- stress of resisting restraint
- prolonged restraint
- inhalation of blood and ingesta.

The Guidelines state that such restraint should be kept as brief as possible and that restraint equipment must be properly designed and operated.

There is clear evidence that inversion should be avoided during the slaughter process because of its adverse impact on cattle welfare. Temple Grandin cites the use of stressful restraint procedures, such as inversion, as the greatest welfare concern during ritual slaughter and recommends that animals should be restrained in a comfortable, upright position (Grandin 2010). This is articulated in her welfare ranking of restraint devices used for ritual slaughter (Table 1). Those devices which hold the animal in an upright position are rated as 'excellent'; those that provide adequate support are rated as 'conditionally acceptable' provided that the animal has its throat cut within 10 sec of inversion. The use of a rotating box that does not provide body support during inversion is considered 'not acceptable'. The use of trip floor boxes that cause the animal to fall down with the use of a slanted floor or other device are considered a serious problem and "*should never be used for conscious animals that are still sensible*".

Advice provided in November 2009 by the Primary Industries Ministerial Council from the Animal Welfare and Product Integrity Team (AWPIT) in relation to the management of unstunned slaughter in Australia also clearly articulates that inversion during restraint is unacceptable to the Australian and State/Territory Governments:

"Restraint for all species should maintain the conscious animal in an upright position."

"The use of inverting restraint boxes for cattle is in itself an animal welfare risk and not acceptable."

Specific issues with the Mark 1 restraint box

The Mark 1 restraint box does not support the animal during inversion. Once in the box, the process of inversion is achieved by tripping the animal so that it falls, unsupported, from a standing position onto its side on a sloped concrete platform. The fall involves a rotation of approximately 135 degrees from the standing position, thus the force with which the animal falls onto the concrete is significant and can cause serious injury:

"On some occasions when an animal is released from the restraint box, and on tripping, it will crash its head onto the concrete plinth." (Beere 2004)

"Animals are leaving the box, falling down hard onto a 45 degree concrete slab and in isolated instances breaking jaws." (Stark 2010)

According to Table 1, this design of box *"should never be used for conscious animals that are still sensible"*.

Observations of falling cattle are documented in the report - these were rated from 0-3 depending on their severity. The average severity of the fall was rated as 1.6, or 'moderate', but no information is provided to separate out falls when restraining boxes were used versus those where no box was used. The Report also found that 17% of cattle regained their feet after inversion, and that on average there were 3.5 head lifts per animal once they had been cast which were regarded as a significant risk to animal welfare. The report concludes that:

"While restraining boxes were observed to significantly improve animal welfare, where the severity of the fall was severe and head slapping occurred, significant animal welfare issues were identified that should be addressed through the SOP and training."

Subsequent designs of the restraint box have provided support for the animal during inversion and head restraint to prevent head lifts after inversion, thus reducing the associated stress and risk of injury. However, it appears that only six of these improved boxes have been installed in Indonesia.

Table 1 Welfare Ranking of Restraint Devices (Grandin 2009)

Excellent	Animal held in an upright position. Research with sheep indicates that animals prefer being held in an upright position. Rushen (1986) reported that when sheep were forced to make repeated choices between upright or inverted restraint they favored upright restraint.
Conditional Acceptable	Rotating restraint box that inverts the animal onto its back. It must have a large adjustable side to support the body and prevent struggling or vocalization during rotation. This class of rotating restrainers would include the Faomia pen and other similar devices. An animal must have its throat cut within 10 seconds after inversion. Rotating boxes are for religious slaughter only.
Not Acceptable	Rotating box with no adjustable side to provide body support. This would include the old fashioned Weinberg casting pen. Dunn (1990) found that cattle held on their backs in the old fashioned Weinberg for 103 seconds had significantly higher cortisol and vocalization rates compared to cattle held in an upright restrainer. Old fashioned Weinberg's could be retro fitted with an adjustable side.
Serious Problem; Automatic FAILED AUDIT	The following methods of restraint should never be used for conscious animals that are still sensible. <ul style="list-style-type: none"> • Shackle and hoist and suspension by the leg or legs. • Shackle and drag by the legs and then roll the animal onto its back. • Trip floor boxes that cause the animal to fall down with the use of a slanted floor or other device. • Leg clamping rotating boxes.

Introduction of stunning

One of the objectives of improving the design of restraint boxes has been to provide for the introduction of stunning (Beere 2004). The Mark 4 box is stated as having the capacity to "*be easily and readily adapted to incorporate the use of stunning*" (Stark 2010).

The Report states that stunning is used in several advanced facilities in Indonesia. Subsequently, LiveCorp/MLA have indicated that approximately 20% of Australian cattle may be being processed through these 2 or 4 facilities.

The Report goes on to say that "*most facilities were unsophisticated and the adoption of stunning technology would be unfeasible*". However, it does not explain why they have drawn this conclusion nor whether the feasibility of expanding the use of stunning has been properly examined by determining the limitations or capacity of each current abattoir to incorporate stunning.

Subsequent discussion with MLA/LiveCorp has indicated that they believe that regulations relating to the use of captive bolt stunning equipment, and the availability of electricity may be limiting factors in expanding the use of stunning, however they did not indicate whether the Australian Government is addressing this issue via diplomatic and other means.

Washing of cast animals

The Report describes how some animals were subjected to 'washing' where buckets of water were thrown over them while restrained on their sides on the concrete slab prior to slaughter, reportedly as a requirement of Halal slaughter. The Report identifies this as "*causing unnecessary stimulation and reaction in the cattle*".

Subjecting restrained animals to further distress in this way is clearly unacceptable, yet the report's recommendation is extremely weak, suggesting that action is taken to "*investigate the need for washing under Halal, and if unnecessary, revise the SOP to discourage washing*".

Slaughter technique

We note that the Report does not provide quantitative information on the time from restraint to death, despite comments from Professor Caple indicating that this information was collected during observations of cattle slaughter.

OIE guidelines require that animals in restraint are stunned as soon as possible. Where animals are not stunned, it follows that the time from restraint to slaughter must also be kept to an absolute minimum. The report found that "*the delay between restraint and slaughter was significant*" in an unstated number of instances.

OIE Guidelines require that where stunning is used, the stun-to-stick time should not exceed 20 sec. The Report does not indicate how many animals were observed to be stunned, but states that "*the time between stunning and sticking was not always less than 20 seconds but was always less than 30 seconds*". In other words, on an unknown number of occasions, OIE guidelines were not met. It should be noted that according to Table 1, where inversion is used prior to slaughter, Temple Grandin's recommendation is that the throat cut be applied within 10 seconds of inversion.

OIE Guidelines require that where slaughter without stunning is practiced, a high level of operator competency and a very sharp blade or knife of sufficient length is used. The desired action is a single swift cut using the body of the blade that severs both carotid arteries. **This was observed only once in 29 slaughter observations.** The report states that "*the average number of cuts was four*", with up to 18 cuts applied on one occasion.

The Report also states that bleeding was 'significantly impaired' in 10% of cattle due to false aneurysms in both carotid arteries, potentially resulting in extended consciousness. Half of the cattle observed being slaughtered were found to have at least one occluded artery. Gregory (2010) reported that cattle can remain conscious for over 60 sec when false aneurysms occur.

Further questions

The above examination of the evidence in the report raises a number of important questions regarding the recommendations in the report itself and the overall MLA/LiveCorp animal welfare program in Indonesia:

1. The evidence in the report indicates that the vast majority of cattle observed were subjected to multiple adverse and potentially painful experiences prior to and during the slaughter process. RSPCA Australia asks why the serious adverse nature of the evidence documented in the report is not reflected in the report summary or its recommendations.
2. The report describes the use of 15 APFINDO/MLA LiveCorp restraining boxes, which subsequent information has indicated were of the Mark 1 design. RSPCA Australia asks why the report fails to provide information on:
 - a. the specific design of the restraint boxes observed in operation
 - b. the inherent design problems with the Mark 1 box
 - c. the risks to animal welfare associated with the use of inversion prior to slaughter
 - d. the need to ensure that, for as long as inversion without prior stunning is practiced, restraint box design should at the very least ensure that animals are effectively supported and rapidly killed.
3. According to the MLA, the installation of Mark 1 boxes in Indonesia has continued up to as recently as 2010. RSPCA Australia asks why Mark 1 boxes were and are being installed when the problems with unsupported inversion and lack of effective restraint have been well-documented and three further refinements of this design have been made.
4. The report indicates that some stunning prior to slaughter is taking place in Indonesia: subsequent information from MLA/Livecorp indicates that up to 20% of Australian cattle may be stunned prior to slaughter. RSPCA Australia asks what steps have been taken to increase the use of stunning or examine the feasibility of restricting the sale and slaughter of Australian cattle to those facilities using stunning (i.e. a through the introduction of a closed system)?

References

- Beere G (2008). Upgrade of an existing mark II cattle restraining box for ritual slaughter. Meat & Livestock Australia Ltd. B.LIV.0346
- Beere (2004). Developing an improved pre-slaughter restraining box for cattle. Meat & Livestock Australia Ltd. LIVE.309
- Stark G (2010). Review of mark three and development of mark four cattle restraining box. Meat & Livestock Australia Ltd. W.LIV.0374
- Grandin T (2010). Auditing animal welfare at slaughter plants. *Meat Science* 86:56-65.
- Grandin T (2009). Evaluation of methods of restraint for holding (fixation) of cattle, calves, and sheep for kosher and halal slaughter. [accessed 16/12/10]
<http://www.grandin.com/ritual/evaluation.restraint.methods.kosher.halal.html>
- Gregory N, et al. (2010). Time to collapse following slaughter without stunning in cattle. *Meat Science* 85:66-69.

Prepared by:
RSPCA Australia Science
21/12/2010



Senator the Hon. Joe Ludwig

Minister for Agriculture, Fisheries and Forestry
Senator for Queensland

REF: MNMC2010-13148

Ms Heather Neil
Chief Executive Officer
RSPCA Australia
PO Box 265
DEAKIN WEST ACT 2600

COPY

Dear Ms Neil

Thank you for your correspondence of 22 December 2010 about the report of the independent study into animal welfare conditions for cattle in Indonesia from point of arrival from Australia to slaughter. I regret the delay in responding.

The Australian Government and the live export industry are committed to working with our trading partners to improve animal welfare in countries that receive our livestock exports. As you are aware, the government is investing \$1.6 million through the Live Trade Animal Welfare Partnership, with matching support from Australian producers and livestock exporters, to further improve animal welfare in, and support trade with, overseas markets. In recent years, infrastructure for unloading, handling and slaughter has been improved in several countries that import Australian sheep, cattle and goats. Education and training has been provided for people involved in animal handling, transport and slaughter.

The independent study was part of a project funded under the partnership that focused on improving animal welfare outcomes for Australian cattle exported to Indonesia. I note that the authors of the study have described the improvements in animal welfare at the point of slaughter in Indonesia through Australian Government and industry investment as 'profound and undeniable'. They also state that it is clear Australia's involvement in the region through the export of cattle is delivering important animal welfare improvements. The authors make a series of recommendations to further improve animal welfare in Indonesia and the live export industry has developed a plan to implement respond to these recommendations.

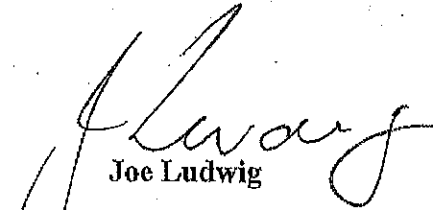
I understand you have met senior officers from the Department of Agriculture, Fisheries and Forestry to discuss the report and have also received a copy of the live export industry's response.

The government will continue to require those receiving funding under the partnership to report on improvements to animal welfare for exported Australian livestock.

On my behalf, the department has sent the report to the Livestock Export Standards Advisory Group for its consideration, as you requested.

Thank you for raising this matter with me.

Yours sincerely



Joe Ludwig

Minister for Agriculture, Fisheries and Forestry
Senator for Queensland

28 February 2011