

RSPCA Australia and Animals Australia

Response to the Australian livestock export industry's *Indonesia animal welfare action plan - May 2011*

Summary

For the past 20 years, the Australian livestock export industry and Government have allowed more than 6 million animals to be exported to Indonesia, knowing that they will face a cruel and lengthy slaughter. This would continue under the proposed industry action plan.

The three key elements of the action plan are: to extend the use of restraint boxes, to advance the use of stunning to five Indonesian slaughterhouses, and a 'desired outcome' to meet OIE standards by 2015. None of these are new developments. They have all failed in the past to protect the welfare of Australian animals, and we have no reason to believe that, in the hands of this industry, they will succeed in the future.

- For a decade, the industry has been installing restraint boxes and other infrastructure and conducting associated training. These restraint boxes would be illegal in Australia, they fail to meet basic international animal welfare standards, and have been condemned by the world's leading slaughter expert Dr Temple Grandin – yet the action plan will allow their continued use. Training programs have failed to prevent the abuse of animals, ensure a basic understanding of cattle behaviour and welfare, or even guarantee proficient slaughter.
- The industry itself has stated, as recently as this year, that expanding the use of stunning in Indonesia would be extremely difficult, if not impossible. A planned stunning trial in a single abattoir in 2010 was not able to be completed. The likelihood of uptake of consistent and effective stunning in over 100 abattoirs that slaughter Australian cattle is absolutely negligible in the foreseeable future.
- The Australian Government and the live export industry have given repeated assurances that signatories to the OIE are obliged to comply with OIE standards. But in Indonesia, as in many other OIE countries, there is no incentive, nor implementation or enforcement regime to achieve this. The action plan indicates that the industry believes it will now take Indonesia four years to be able to meet OIE standards – the minimum international standards for animal welfare. Yet it has been exporting animals to this country for 20 years.

Response to the action plan

The action plan states:

Background

Indonesia is Australia's most valuable live cattle export partner, taking 59.5% of our cattle exports and contributing \$319 million to the Australian economy in 2010. The Australian livestock export industry and the Australian Government have invested over \$4 million into improving animal welfare in Indonesia over the past 10 years through training, education and infrastructure programs.

The Indonesia animal welfare action plan is designed to meet industry's strategic vision of ensuring all animals exported from Australia are managed through known supply chains and treated humanely under endorsed livestock welfare standards from the point of arrival in overseas markets through to the point of processing. Close co-operation with the Australian and Indonesian Governments, as well as the local Indonesian industry, will be essential in delivering the animal welfare improvements outlined in this plan.

The industry programs in Indonesia over the past 10 years have focused on the installation of restraint boxes and associated training in order to increase the number of slaughterhouses where Australian cattle can be safely handled, reduce pre-slaughter stress and improve meat quality. They have categorically failed to make any significant improvements in the welfare of Australian cattle, as demonstrated by the footage obtained in the 2011 Animals Australia investigation and the RSPCA Australia analysis of this footage. In terms of improving animal welfare, the \$4 million of industry and taxpayer's money has been wasted on a restraint box program that entrenches inhumane handling and cruel slaughter techniques.

Until the Animals Australia investigation, the industry had no strategic vision or desire to manage supply chains (i.e. establish closed systems) in order to protect Australian animals from cruelty. In 2010, the industry responded to a direct request by animal protection groups to introduce closed systems, so that Australian animals only went through appropriate facilities, by again claiming their current provision of *ad hoc* facility upgrades and training was the best way to improve animal welfare in importing countries. Animals have been exported to Indonesia, and all other countries bar Egypt, with no restrictions on where they might be transported to or slaughtered.

The action plan states:

Desired outcome

From 2015 Australian livestock will only be supplied into facilities where supply chains meet the relevant sections of the OIE (World Organisation for Animal Health) standards.

The OIE Code sets out international minimum standards for animal welfare. They are intended to set a basic benchmark to provide guidance to countries that are still in the process of developing, or are yet to develop their own animal protection legislation and standards. This benchmark is far below the minimum standards of major livestock producing countries such as Australia. For example, the OIE standards allow the slaughter of fully conscious animals: this is not permitted under Australian slaughter standards.

The Australian Government and the live export industry have given repeated assurances that signatories to the OIE are obliged to comply with OIE standards. Now the industry is putting forward an action plan that sets operating to OIE standards – the point that Indonesia should have been at before live cattle exports began – only as a 'desired outcome' to be reached by 2015. In other words, the industry believes it will take Indonesia four years to reach the most basic international standards of animal welfare. Yet it has been exporting animals to this country for 20 years.

The action plan states:

Standards

Develop and implement endorsed livestock welfare standards for port, transport, feedlot and abattoir to ensure Indonesia is operating at or above OIE standards:

- *Assess and review current point of processing Standard Operating Procedures (SOPs). 30 Jun 2011*
- *Develop industry point-of-processing standards and measurements for restraining box installation, maintenance and upgrades. 30 Sep 2011*
- *Commence extension and implementation of endorsed livestock welfare standards in Indonesia. 31 Oct 2011*

In Australia, the process of developing Australian animal welfare standards would always include targeted consultation with all stakeholders, including key animal protection organisations, and a period of open public consultation. This provides a transparent, inclusive and relatively robust process. The industry action plan does not involve either of these inputs. This industry has a history of employing consultants with links to the trade, or ‘experts’ who have previously or currently receive funding associated with the trade. These experts and consultants cannot be considered independent as they have an inherent conflict of interest.

Details of existing Standard Operating Procedures (SOPs) and the criteria against which facilities are assessed have never been made public or provided for comment to animal protection groups. Previous reports have stated that SOPs have already been reviewed. An auditing process for restraint boxes was developed in 2005 but has never been implemented.

The standards suggested here would see the continued use of Australian-designed restraint boxes that have so clearly been shown to cause extreme distress and potential injury to cattle. This is a device that does not comply with OIE standards which state that ‘methods of restraint causing avoidable suffering should not be used in conscious animals because they cause severe pain and distress’. Not one Mark 1 restraint box would be removed from use under this plan – indeed their use would be further cemented and extended through a program of maintenance and upgrades.

Australia already has a set of clearly articulated standards for land transport of cattle, for the management of cattle in feedlots, and for the slaughter of cattle. The regulatory framework in Australia means that these standards, once implemented, are clear and enforceable and that auditing and enforcement actually occurs. In Indonesia, there are no such mechanisms in place.

Implementing standards requires training. We have already seen how training in standard operating procedures for Mark 1 restraint boxes has failed. Workers at slaughterhouses tend to be unskilled and subcontracted on a temporary basis. The industry is fully aware that “due to the enormous turnover of people in the slaughter teams and their relatively low social status, it is not a good strategy to invest in training personnel in animal handling practices at this level”¹.

¹ Beere, G. & Pettiford, S. (2005) Opportunities to improve slaughter standards and profitability in Indonesia, Project LIVE.229, June 2005, Meat & Livestock Australia Ltd, North Sydney.

The action plan states:

Stocktake

Develop an Indonesian Animal Welfare Taskforce (IAWT) and conduct a stocktake of all facilities and locations processing Australian livestock:

- *Form an Indonesian Animal Welfare Taskforce (IAWT) and identify and train 20 new Animal Welfare Officers to play a key role in the implementation of the Indonesian animal welfare program. 30 Jun 2011*
- *Animal Welfare Officers to identify all facilities/locations processing Australian cattle. 30 Jun 2011*
- *Assess acceptability of processing facilities/locations and rank in order of priority for upgrade. 30 Sep 2011*

An Indonesian Animal Welfare Taskforce was established in 2006 to identify abattoirs that needed to be upgraded to kill Australian cattle, to assess the facilities and install restraint devices, and to train abattoir workers². This work has been underway for five years. The Taskforce is made up of representatives from Meat & Livestock Australia, Livecorp and APFINDO (the local feedlot association).

There are approximately 750 registered slaughterhouses in Indonesia, and potentially hundreds more unregistered slaughter locations. Estimates of the number of locations where Australian cattle are slaughtered vary between 120 and 300, but given that there are no restrictions on their dispersal, there is the potential for Australian cattle to be slaughtered in any location. Industry spokespeople have stated that there are a 'multitude' of processing facilities across Indonesia and it is 'impossible' to get across all of these³.

The introduction of an abattoir auditing system was recommended six years ago in an industry-funded report⁴. This included a checklist based on Dr Temple Grandin's abattoir audit critical control points which are also used in Australian abattoirs. If this auditing process had been implemented back in 2005, then the industry would have been aware of the unacceptability of processing facilities at that time. None of the facilities visited in the 2011 Animals Australia investigation would have passed such an audit.

Unless the slaughter of Australian cattle could be restricted to locations where a skilled and permanent workforce was employed, pre-slaughter stunning was effectively used, training and auditing programs were in place, and enforceable animal welfare legislation was introduced, it is difficult to see how their treatment could be reliably and sustainably improved.

The action plan states:

Stunning

Build a process for ongoing advancement of stunning of Australian livestock:

- *Seek endorsement from local religious and Indonesian Government authorities for the use of stunning in processing cattle. 31 May 2011*
- *Import required Halal stunners and equipment. 31 May 2011*
- *Train operators in stunning SOPs at five selected abattoirs. 30 Sep 2011*
- *Commission stunning equipment at five selected abattoirs. 30 Nov 2011*
- *Stunning plan ready for broader expansion. 01 Jan 2012*

² MLA/LiveCorp Live Trade Animal Welfare Partnership 2009/10 Final report – Public Release. Indonesian point of slaughter improvements

³ <http://www.abc.net.au/rural/news/content/201105/s3228813.htm>

⁴ Beere, G. & Pettiford, S. (2005) Opportunities to improve slaughter standards and profitability in Indonesia, Project LIVE.229, June 2005, Meat & Livestock Australia Ltd, North Sydney.

There is absolutely no need to seek endorsement for stunning in Indonesia. It is already accepted at a government level and by the Indonesian halal certifying body, Majelis Ulama Indonesia. Despite this, only four of the 750 registered abattoirs in Indonesia use stunning. The problem is not endorsement, or religious sensitivities, it is changing traditional practices and enforcing such changes. There is no evidence of willingness or incentive to change within Indonesia, and no equipment in place in most slaughterhouses to facilitate the use of stunning on Australian cattle.

This plan also completely fails to recognise that the Mark 1 restraint box cannot be used for stunning as it does not hold the animal's head or body in a fixed, stable position. In fact, the industry's own reports have already acknowledged that the Mark 1 restraint box cannot incorporate stunning.

In late 2010, MLA and Livecorp told RSPCA Australia that expanding the use of stunning in Indonesia would be extremely difficult, if not impossible. Shortly afterwards, a report on the Live Trade Animal Welfare Partnership between government and industry stated that "there are significant impediments in Indonesia to slow the movement to a more constrained slaughter practice". A planned stunning trial in a single abattoir in 2010 was not able to be completed due to a broad range of identified impediments in Indonesia. Now, a few months later, the industry is suggesting that they could facilitate the adoption of stunning in five abattoirs and implying that the broad uptake of stunning will occur from 2012. This is pie in the sky. The only slaughterhouses that are likely to be stunning animals at the end of 2011 are those private facilities that are already stunning, or already have the facilities and equipment to use stunning. The likelihood of uptake of consistent and effective stunning in over 100 abattoirs that slaughter Australian cattle is absolutely negligible in the foreseeable future.

The action plan states:

Stakeholders, education and training

Deliver point of processing SOP training to each facility processing Australian cattle.

- *Expand the existing team of animal welfare trainers to improve the training capacity of the industry. 30 Jun 2011*
- *Deliver SOP training to every facility on a priority basis. Annually*

Strengthen industry relationship with Indonesian Government.

- *Work with the Indonesian Government's Directorate General of Livestock Services (DGLS) to develop modular abattoir designs. 30 Sep 2011*

It is deeply concerning to contemplate what this implies – that Australian-designed restraint boxes could have been installed in Indonesian slaughterhouses by MLA and Livecorp without any associated or ongoing training being delivered. But the key problem with this proposed action is that it totally fails to acknowledge that the installation of the Mark 1 box has acted to entrench a system of restraint and slaughter that is inherently cruel. No amount of SOP training can prevent the forcible casting of Australian cattle onto their sides on a sloping concrete slab from causing distress, pain, suffering or injury.

The 2011 investigation has demonstrated that, where training programs have already been delivered in conjunction with the installation of restraint boxes, it has not had sufficient impact on Indonesian workers to prevent the abuse of animals or ensure a basic level of understanding of animal welfare, knowledge of their requirements under the OIE Code, or ability to perform an efficient throat cut.

The action plan states:

Assessments and upgrades

Conduct ongoing assessments of all facilities/locations processing Australian animals:

- *Implement infrastructure upgrades and improvements based on priorities identified in stocktake. Ongoing*
- *Ongoing assessment of all facilities to ensure adherence to endorsed livestock welfare standards. Ongoing*
- *Facilities not meeting acceptable processing standards are upgraded or decommissioned in liaison with the IAWT and Indonesian Government. Ongoing*

There has been an Indonesian Animal Welfare Taskforce (MLA/LiveCorp/APFINDO) since 2006 doing exactly these assessments, identifying priorities and overseeing the installation of restraint boxes and training. That this system has failed is clear from the evidence provided in the 2011 investigation.

Yet again, the actions outlined here indicate that industry has not understood that Mark 1 boxes should never be used to restrain cattle. This box design is in direct contravention of the OIE Code which states that “methods of restraint causing avoidable suffering should not be used in conscious animals because they cause severe pain and distress”. Nowhere in this action plan is there any acknowledgement of the industry’s failure to assess the welfare impact of this restraint device or that the restraint box is unable to accommodate stunning and thus is an impediment to expanding the uptake of stunning.

It is absurd to suggest that in a country with no enforceable animal welfare regulations or penalties, “adherence to endorsed livestock welfare standards” is an achievable goal. Neither the industry nor the Australian Government have the capacity to ensure adherence to standards in another country.