



Australian Government
Department of Agriculture

Compliance Investigation Report 22

Cattle Exported to Mauritius

May 2014





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Summary

On 23 October 2013, the Department of Agriculture received a report from Animals Australia that Australian cattle exported to Mauritius under Exporter Supply Chain Assurance System (ESCAS) requirements had been moved to locations outside of the approved supply chain and slaughtered in a manner not compliant with OIE animal welfare recommendations. The report advised that the video provided with the report was taken from 13 to 16 October 2013 during the Eid Al Adha (Korban) festival.

The department's investigation included assessment of information provided in the report, departmental records of export consignments and information provided by the exporter and Mauritian authorities.

One licensed exporter, International Livestock Export Pty Ltd (ILE) had received approval to export a consignment of cattle to Mauritius under ESCAS arrangements. That consignment and the exporter supply chain are the subject of this investigation.

The investigation found that several cattle visible in the video were exported to Mauritius under ESCAS requirements, which has been confirmed by the exporter, ILE. The investigation also confirmed that several livestock that were exported by ILE were moved outside of the approved supply chain and were subject to handling and slaughter not consistent with OIE animal welfare recommendations. The department has recorded a major non-compliance against the ILE Mauritius supply chain.

Additional requirements to strengthen control and animal welfare outcomes were applied to a subsequent consignment of cattle exported to Mauritius during the course of the investigation. These included having a supply chain officer, additional auditing and reporting requirements, and an extra representative of the company to be present in Mauritius during the next Eid Al Adha (Korban) festival.

1. Introduction

On 23 October 2013, the Department of Agriculture received a report from Animals Australia alleging non-compliance with Exporter Supply Chain Assurance System (ESCAS) arrangements in Mauritius. The report alleged that Australian cattle exported under ESCAS arrangements had been moved to locations outside of the approved supply chain and slaughtered in manner not in accordance with OIE animal welfare recommendations. The report included video of cattle reportedly taken on 13, 14 and 16 October 2013 at several locations in Mauritius, including an approved feedlot and a private residence.

ESCAS requires exporters to send animals to facilities that meet World Organisation for Animal Health (OIE) animal welfare recommendations. Animals must remain in those facilities and the exporter must be able to account for all animals. Legislation and other relevant documents to the export of live animals can be found on the department's website at <http://www.daff.gov.au/biosecurity/export/live-animals/livestock/regulatory-framework/acts-regulations-orders-standards>

ESCAS requirements for feeder and slaughter livestock exported to Mauritius took effect from 1 January 2013.¹

2. Conduct of the Investigation

On receipt of the report, the department assessed the information and commenced an investigation.

The focus of the investigation was to determine:

1. If the photographs were taken in the locations on the dates alleged in the report.
2. If any cattle shown in the photographs were exported to Mauritius under ESCAS arrangements (that is, after 1 January 2013) and if so, by which exporter.
3. If there was non-compliance with any aspect of ESCAS requirements.

3. Information Provided by the Exporter

One exporter, International Livestock Export Pty Ltd (ILE), had received approval to export cattle to Mauritius between 1 January 2013 and 23 October 2013. The exporter had one supply chain in Mauritius, consisting of one feedlot and one abattoir.

On 8 November 2013 the department wrote to the exporter requesting that they provide information relevant to the investigation and the consignment that had been exported subject to ESCAS requirements.

ILE provided all the information required by the department. A summary of the information provided is shown in Table 1.

Table 1 – Summary of information provided to the department by the exporter.

Information requested	Summary of exporter response
Comment on the normal time taken to slaughter all animals in one consignment in the supply chain.	The exporter reported that it takes approximately six months for all animals in one consignment to be slaughtered.

¹ Further information on the ESCAS framework is available on the department's website at <http://www.daff.gov.au/biosecurity/export/live-animals/livestock/information-exporters-industry/escas>.

Information requested	Summary of exporter response
Any information relating to animals exported prior to 1 January 2013 remaining in the supply chain, if relevant, including the number of cattle exported prior to 1 January 2013 and details of the method of separation of the sheep exported prior to 1 January 2013 from sheep exported after 1 January 2013.	The exporter confirmed that no animals remained alive in the supply chain that were exported prior to January 2013
Comments on whether the appearance of the cattle or ear tags visible in the footage are consistent with those exported to the supply chain.	The exporter reviewed the provided footage and was able to identify four cattle that were exported by them, providing the tag numbers of these animals to the department. The cattle were not in approved facilities.
Confirmation of whether any livestock exported to Mauritius remain alive	Interim processing report provided confirming number of cattle alive.
A complete and current reconciliation of cattle exported to Mauritius	Interim processing report provided, including reconciliation, which did not show any movement of cattle outside of the approved supply chain.
Any documentary evidence on the processing and handling of animals exported in the consignment exported	The exporter provided traceability and slaughter records from the consignment.
Electronic list of property identification codes including details of the states in which they are located, and NLIS tag numbers for cattle exported to Mauritius	As the exporter was able to confirm the identity of four cattle we did not require the individual NLIS tag numbers.
Information about visits made to facilities within the exporters supply chain in Mauritius	The exporter provided details of several visits to the supply chain, including one to investigate the report after receipt of the complaint, in December 2013.
The exporters plans to investigate the integrity of the accounting system for the supply chain	<p>The exporter advised the department of their plan to visit and investigate the report, then provided the outcomes of their investigation to the department.</p> <p>The exporter's investigation determined that an individual defrauded the system and was responsible for the movement of the cattle outside of the supply chain, from the approved feedlot. This occurred during Eid, the main time of the year in Mauritius when cattle are permitted to be slaughtered at home, rather than in the main abattoir of Mauritius.</p>
Any independent audit reports for audits conducted for all or part of the supply chain since approval of the consignment	An independent audit report of the supply chain was provided, including assessment of control, traceability and animal welfare. This audit included physical visits to supply chain facilities conducted after the dates on which the video was taken. The audit did not identify any non-compliances.
Details of any additional assurances that the exporter will take to ensure ESCAS requirements are met for any future consignments	The exporter provided details of several additional measures, including additional training, installation of RFID readers and amended contracts with the importer. Further detail of these actions is included in section 6.

4. Investigation Findings

The department's records showed that one consignment of cattle had been exported to Mauritius, by ILE. The consignment consisted of 2000 cattle and was exported in August 2013

The photographs show 15-20 cattle which appear consistent with the breed of Australian cattle previously exported to Mauritius (Brahman cross), however the department is aware that cattle from other countries are also imported into Mauritius. Several of the cattle in the photographs and video had RFID ear tags that are consistent with those used for National Livestock Identification System (NLIS) identification. In addition, other numbered tags were visible. ILE confirmed that four of the cattle shown in the photographs and video at a location that was not within the approved supply chain were exported by the company in August 2013.

The video showed cattle at two locations. The appearance of one location was consistent with the feedlot that is part of the approved supply chain, where cattle were being loaded onto a truck. The second location did not match any of the approved supply chain facilities, and was where cattle were unloaded and slaughtered.

The video of the four cattle identified as having been exported by ILE under ESCAS requirements was assessed to determine if the practices shown were compliant with OIE animal welfare recommendations. The assessment was performed using the Animal Welfare Performance Targets and Measurements checklist from the 'Guidance on Meeting OIE Code Animal Welfare Outcomes or Cattle and Buffalo Version 2.2' (the checklist). This video showed some of the cattle at the feedlot and one at the second (unidentified) location outside of the approved supply chain.

This assessment determined that some of the handling and slaughter practices shown in the video did not meet OIE animal welfare recommendations. Specifically the assessment found non-compliance with multiple points of sections 1, 2 and 6 of the checklist. These non-compliances are summarised in Table 2.

Table 2: Summary of non-compliances identified during Department of Agriculture assessment of video of the four cattle confirmed to have been exported under ESCAS requirements.

Animal welfare performance measure or target	Non-compliant Actions Recorded
Element 1 – Handling of Livestock	
1.1 - Movement of livestock is carried out calmly and effectively. 1.5 - Livestock are not left individually restrained during break times or delays. 1.6 - All individual livestock are observed for signs of lameness, illness and injury during loading, unloading and when in facilities. 1.8 - Animals are handled to avoid harm, distress or injury 1.10 - Livestock are not subjected to procedures that cause pain and suffering.	In one section of the video, an animal is visible at a location outside of the approved supply chain. The animal is isolated from other animals and tied to a wall by a rope around its neck (1.5, 1.8). This animal is seen to be bleeding from the horn or head, but not receiving any attention for this injury (1.6). In another section of video, an animal is being handled and ropes are used to make it fall to the ground for slaughter. The animal is handled roughly (including being kicked). Once tied on the ground, the animal is also dragged into position on the ground once tied up (1.1, 1.8 and 1.10). This animal is seen tied up by itself, while another animal is slaughtered (1.5).
Element 2 – Land Transport of Livestock	
2.5 - The vehicles are suitable for transporting livestock of the class involved and for the distance required.	In one section of the video, taken at a feedlot, animals are loaded onto a truck where animals are seen slipping on the flooring of the truck(2.5)

Animal welfare performance measure or target	Non-compliant Actions Recorded
Element 6 – Slaughter without Stunning	
<p>6.1 - Slaughter of livestock is carried out calmly and effectively.</p> <p>6.3 - The method of restraint employed is appropriate for the size and class of livestock being slaughtered.</p> <p>6.4 - Animals are presented for slaughter without being unduly stressed.</p> <p>6.5 - The restraining equipment is free from obstructions and sharp edges.</p> <p>6.8 - The head of the animal is kept in extension to prevent the edges of the wounds touching until the animal is dead.</p> <p>6.9 - The method of restraint employed is working effectively.</p> <p>6.12 - The throat is cut using a single, deep, uninterrupted fast stroke of the knife.</p>	<p>In the video, an animal has been restrained using ropes on the ground for slaughter on the ground and is held by several individuals (6.3) at a location that is not the approved abattoir (appears to be a backyard or private residence. No suitable restraining equipment is provided (6.3, 6.5, 6.9). The procedure of casting is not performed calmly or quickly, taking some time during which the animal struggles against those performing this procedure (6.1, 6.4, 6.9). The animal is slaughtered on the ground, after the cut is made the rope which has been placed around the neck appears to be in the wound and the hand on one of the people restraining the animal appears to be touching the edges of wound (6.8). Within 21 seconds post cut people begin to touch in and around the wound, for about 30 seconds, while the animal is still conscious (signs of consciousness, including rhythmic breathing, are still visible up to a minute after this occurs). A second small cut is made by the slaughterman approximately 40 seconds after the initial cut (6.12).</p>

The exporter provided a submission to the department after being informed of the report. The exporter claimed that the movement of cattle outside of the supply chain occurred due to the actions of an individual, who did so for financial gain. They claimed that the movement of cattle occurred from the approved feedlot and inaccurate slaughter records were provided for these cattle. The exporter also claimed that the RFID reader at the feedlot was not being used properly (due to technical issues) and tags were being manually recorded.

The investigation assessed the exporter’s submission and accepted the exporter’s explanation that the non-compliances occurred to a small number of animals due to the actions of an individual and noted they were limited to during Eid, the main time of year in Mauritius where home slaughter of cattle is permitted.

An independent audit conducted of the supply chain was also reviewed. This included physical visits to facilities on 11 to 12 December 2013, after the dates on which the non-compliance occurred. The audit included assessment of the exporters systems for traceability, control and animal welfare for the supply chain, and did not identify the non-compliance that occurred in October. However the department also recognised that audits are point-in-time observations, and accepted the findings of the audit.

In Mauritius, home slaughter of imported cattle is only allowed with the permission of the government, and only for specific religious festivals. Special permits must be obtained from the authorities in order for cattle to be released for this purpose. Regulations in Mauritius require that all cattle that do not have a home slaughter permit must be slaughtered in the only allowed abattoir in Mauritius, which is the abattoir that is included in the exporters approved supply chain.

However after the report was received, Mauritian authorities released a statement declaring that cattle imported into Mauritius from Australia would no longer be eligible for home slaughter and they would not issue permits for Australian cattle to be home slaughtered.

5. Investigation Conclusions

The investigation involved the review of the only consignment of cattle exported to Mauritius under ESCAS requirements and the supply chain for that consignment, consisting of one feedlot and one abattoir. It

concluded that four of the cattle in the photographs were exported under ESCAS requirements by ILE. These cattle were moved outside of the approved supply chain and were handled and slaughtered in a manner not in compliance with OIE animal welfare recommendations.

In accordance with the Guideline - Management of Non Compliance, the department has recorded a major non-compliance in relation to the ILE Mauritius supply chain.

6. Actions Taken

After receiving information from the department about the report, ILE sent a senior representative to the supply chain facilities in Mauritius. ILE advised they had taken several steps including identifying the point where cattle were moved outside the supply chain and the person responsible. ILE also advised they had taken steps to prevent and detect any further movement of animals out of the supply chain, including:

- Installation of new RFID reading equipment at the feedlot
- Strengthening ESCAS agreements between ILE and the importer
- Additional animal welfare and RFID training for the importer/supply chain staff.
- Ensuring that the individual responsible for the movement of the cattle outside the supply chain no longer has responsibility for live animals
- Applying additional traceability measures at the abattoir to ensure that correct slaughter records are maintained and provided to the importer, including daily reporting to the importer.

During the course of the investigation, ILE applied for a further approval to export cattle to the Mauritius supply chain. The department approved the application to export cattle to Mauritius subject to the following additional conditions:

- Ensure that a supply chain officer (SCO) is in place in the supply chain. The SCO must complete the following:
 - Take steps to prevent leakage and conduct regular reconciliation of all animals in the supply chain including:
 - Whether or not any leakage of animals occurred at any point in the approved supply chain; and
 - Whether or not animals consigned to the abattoir in the approved supply chain were slaughtered at the relevant abattoir
- Ensure that during each audit of the supply chain the independent auditor assesses:
 - Whether the Supply Chain Officer (SCO) conducted regular reconciliations of all animals in the supply chain including:
 - Whether or not any leakage of animals occurred at any point in the approved supply chain
 - Whether or not animals consigned to the abattoir in the approved supply chain were slaughtered at the relevant abattoir.
 - The effectiveness of actions taken by the exporter to account for animals at all times and to prevent the movement of animals outside the supply chain.
- No later than the 1st day of each month, the export licence holder must provide the department with a declaration from a person in management or control for International Livestock Export Pty Ltd stating whether or not cattle exported from Australia remained within the supply chain up to the point of slaughter and confirming that a full reconciliation has been conducted within the previous 30 days.
- A representative of ILE (in addition to the SCO) must be present in the supply chain for the duration of the Eid Al Adha (Korban) festival to further ensure that no leakage occurs at any point in the approved supply chain

- 10 days after completion of the Eid Al Adha (Korban) festival, International Livestock Export Pty Ltd must supply the department with a declaration from a person in management or control stating whether or not a representative of ILE (in addition to the SCO) was present in the supply chain for the duration of the Eid Al Adha (Korban) festival.

ILE also advised that the following additional activities will occur, for that consignment:

- An ILE representative will travel to Mauritius to supervise the arrival of the consignment and feedlot operations during the first week that the consignment is in Mauritius. The representative will also conduct additional animal welfare and RFID equipment training
- A representative from Meat and Livestock Australia will also be present for approximately week after unloading to conduct additional animal welfare and slaughter training for an animal welfare officer at the approved abattoir.
- In addition to this an ILE representative will travel to Mauritius during the 2014 Korban festival to monitor and prevent any movement of cattle outside of the approved supply chain.

After taking the exporters' ESCAS submissions into account, and having considered the information obtained during the investigation, the delegate of the Secretary decided to approve the ESCAS subject to additional conditions.

These conditions will continue to be considered on a consignment by consignment basis, for any future requests for approvals of this supply chain.

The exporter has confirmed to the department that a supply chain officer has been placed in the supply chain and provided the required declarations to date.