



**Australian Government**  
**Department of Agriculture  
and Water Resources**

# **Exporter Supply Chain Assurance System Regulatory Performance Report**

**1 December 2016 to 28 February 2017**

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## 1 OVERVIEW

The Exporter Supply Chain Assurance System (ESCAS) requires exporters' to have commercial arrangements with supply chain partners (i.e. importers, feedlots, abattoirs) in importing countries to provide humane treatment and handling of livestock from arrival in the importing country up to the point of slaughter. ESCAS is underpinned by the following key principles – animal welfare, control and traceability – whereby the exporter must demonstrate, through a system of reporting and independent auditing:

- animal handling and slaughter meets World Organisation for Animal Health (OIE) animal welfare standards (animal welfare)
- the exporter has control of all supply chain arrangements (including having agreements in place with supply chain partners) for the transport, management and slaughter of livestock, and that all livestock remain in the supply chain (control)
- the exporter can trace or account for all livestock through the supply chain (traceability).

If issues arise, ESCAS provides a mechanism to require exporters to address any non-compliance matters within their supply chains. This may be managed by undertaking additional steps at facilities (for example delivering training, upgrading infrastructure), by removing non-compliant facilities from a supply chain, or by not exporting any further livestock to a non-compliant supply chain.

Additionally, the ESCAS regulatory framework enables the Department of Agriculture and Water Resources to review and investigate reported non-compliance with ESCAS requirements and take regulatory action where appropriate. Reports are generally received through one of four pathways: third parties (for example, Animals Australia or private citizens in an importing country), industry, directly from exporters, or identified by the department itself. Reports are reviewed by the department using the *Guideline for the management of non-compliance* (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>).

In response to an ESCAS non-compliance, the department may apply regulatory actions to an ESCAS supply chain or, in more serious instances, to an exporter or an entire market. This may include cancelling an ESCAS, varying an ESCAS to remove facilities or apply additional conditions (see section 3.2), cancelling or suspending an export licence, or reprimanding an exporter. Regulatory action is applied based on the nature of the non-compliance and level of associated risk, with any corrective actions implemented by the exporter to mitigate risks taken into consideration.

## 2 PERIOD SUMMARY: 1 DECEMBER 2016 – 28 FEBRUARY 2017

From 1 December 2016 to 28 February 2017, more than 519,000 livestock (buffalo, cattle, goats and sheep) were exported in 142 consignments approved under ESCAS requirements from Australia to 14 markets (Table 1) by 19 exporters.

*Table 1 - Markets for Australian Livestock exported under ESCAS - 1 December 2016 to 28 February 2017*

Bahrain	China	Indonesia
Israel	Japan	Jordan
Kuwait	Malaysia	Oman
Philippines	Qatar	Turkey
United Arab Emirates	Vietnam	

During this period, the department received reports of non-compliance with ESCAS requirements involving supply chains in Indonesia, Israel, Turkey and Vietnam.

Twelve non-compliance investigations were completed and published by the department in nine reviews with 15 findings of non-compliance (Table 2). During this period, the department recorded four critical, five major and six minor findings of non-compliance against ESCAS supply chains or facilities.

*Table 2 Summary of findings of ESCAS non-compliance - reviews completed 1 December 2016 to 28 February 2017*

Market	Reviews	Finding				
		Critical	Major	Minor	No confirmed	No non-compliance
Israel	1			1		
Kuwait	1	1		1		
Lebanon	1	1				
Malaysia	2	2	2	3		
Oman	1		1			
United Arab Emirates	1		1	1		
Vietnam	2		1			1
<b>Total</b>	<b>9</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>0</b>	<b>1</b>

### 3 ESCAS NON-COMPLIANCE REVIEWS

#### 3.1 Overview of findings

An overview of findings for reviews completed in the period 1 December 2016 to 28 February 2017 is provided in Table 3. A detailed summary for each review is provided in Section 4 of this report.

Table 3 ESCAS regulatory performance reviews completed 1 December 2016 to 28 February 2017

#	Date	Type	Market	Species	Animals reportedly involved	Exporter	Non-compliance finding
103	June 2016	Animals Australia	Israel	Cattle	248	LSS	Minor
114 & 117	September 2016	Industry/Animals Australia	UAE	Sheep	Over 512	Emanuel LSS	Major Minor
115 & 122	September 2016	Industry/Animals Australia	Oman	Sheep	Over 897	Emanuel	Major
116 & 120	September 2016	Industry/Animals Australia	Kuwait	Sheep	Over 360	Emanuel (Emanuel and LSS)	Minor Critical*
118	September 2016	Animals Australia	Malaysia	Cattle, Sheep and Goats	Over 130	ILS ILE P&D Halleen Lembiru NACC	Critical Major Major Minor Minor Minor
119	September 2016	Animals Australia	Lebanon	Sheep	Over 1000	Fares	Critical
124	October 2016	Self-reported by exporter	Malaysia	Sheep	95	ILS	Critical
125	November 2016	Self-reported by exporter	Vietnam	Cattle	13	ILE	No non-compliance
128	December 2016	Self-reported by exporter	Vietnam	Cattle	1	(Austrex, SEALS, LSS)	Major*

\*Non-compliance was recorded against a facility. The department will consider the findings of this report when assessing any future applications to add the facility to an exporter's supply chain. Exporters with these facilities approved are listed in brackets.

#### 3.2 Actions taken in response to ESCAS non-compliance reports

The department and exporters have implemented a range of regulatory, corrective and preventative actions in response to confirmed non-compliance.

Regulatory action applied by the department this period included:

- suspending and/or removing non-compliant facilities from ESCAS supply chains
- plan to audit all Malaysia and Middle East exporters' control and traceability systems

- requiring exporters to provide management plans for animals in suspended facilities
- requiring all sheep exporters to Kuwait to review and amend their Supply Chain Management Plans (SCMPs) to include ongoing corrective actions undertaken as a result of report findings
- requiring all exporters to Malaysia to prepare an Eid Management Plan prior to approving consignments to be exported to Malaysia for Eid 2017.

Corrective actions implemented by exporters this period included:

- providing additional training to staff at facilities
- suspending supply of livestock to facilities
- revising processes and implementing improved control and traceability measures
- appointing Animal Welfare Officers (AWOs) to oversee animal welfare and control and traceability requirements at facilities and supply chains
- placing staff at facilities to secure them and prevent further non-compliant movement of sheep
- liaising with importers and facilities to reiterate ESCAS requirements
- updating supply chain monitoring and verification processes
- requiring additional training for stockpersons aboard vessels
- updating discharge procedures
- engaging with the Israeli government to allow judicious use of acceptable encouragement devices at wharves during discharge
- amending contracts with importers to clarify reporting requirements under ESCAS
- restricting the sale of sheep to traders responsible for selling sheep outside the approved supply chains
- recovering sheep from unapproved markets and returning them to the approved supply chain.

## 4 ESCAS REGULATORY PERFORMANCE REVIEWS

### Markets

- Israel – Report 103
- Kuwait – Reports 116 and 120
- Lebanon – Report 119
- Malaysia – Reports 118 and 124
- Oman – Reports 115 and 122
- United Arab Emirates – Reports 114 and 117
- Vietnam – Reports 125 and 128

### Exporters

Austrex	Australian Rural Exports Pty Ltd	Breedex	Breedex Australia Pty Ltd
Capricorn	Capricorn Pastoral	Emanuel	Emanuel Exports Pty Ltd
EMS	EMS Rural Exports Pty Ltd	Fares	Fares Rural Exports Pty Ltd
FIN	Frontier International Northern Pty Ltd	Halleen	Halleen Australasian Livestock Traders Pty Ltd
ILE	International Livestock Exports Pty Ltd	ILS	Independent Livestock Services (formerly Jamie McMillan Brown)
Lembiru	Lembiru Livestock Pty Ltd	LSS	Livestock Shipping Services Pty Ltd
NACC	North Australian Cattle Company Pty Ltd	P&D	P&D Exports Pty Ltd
SEALS	South East Asian Livestock Services Pty Ltd		

### Acronyms and abbreviations

AWO	Animal Welfare Officer	ESCAS	Exporter Supply Chain Assurance System
IPAR	Independent Performance Audit Report	NLIS	National Livestock Identification System
RFID	Radio Frequency Identification Device	SOP	Standard Operating Procedure
SCMP	Supply Chain Management Plan		

### **Description of Supply Chain Elements**

- Depot      A facility where livestock is rested between journey(s) or holding facilities in a particular region where livestock are delivered from farms for assembly before a journey.
- Feedlot    A facility where livestock are gathered to be fattened for market.
- Abattoir    A facility used for the slaughter of livestock and production of meat or meat products

## **4.1 ISRAEL**

### **Background**

The Exporter Supply Chain Assurance System (ESCAS) was implemented in Israel on 1 September 2012.

As at 28 February 2017, one consignment of livestock has been exported under ESCAS arrangements to Israel in 2017, including 9782 cattle and 21 000 sheep. This makes Israel the third largest market for cattle and sheep by volume in 2017 to date. There are currently five Australian exporters with approved supply chains to export livestock to Israel.

The department has previously published reviews of 12 reports relating to non-compliance in Israel. From these reports, five findings of non-compliance have been recorded against exporter supply chains. The reviews can be found at:

<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance>.

As at 28 February 2017, there is one report of non-compliance under investigation for Israel.

### **Report # 103: Cattle exported to Israel**

#### **Incident report**

On 2 June 2016, the Department of Agriculture and Water Resources received a report from Animals Australia about non-compliance with the Australian Standards for the Export of Livestock (ASEL) and Exporter Supply Chain Assurance System (ESCAS) animal welfare requirements during unloading of cattle at the Port of Eilat, Israel on 9 May 2016, and in the post arrival quarantine facility following unloading. The report included a 7 minute 45 second video of the unloading, and video and photographs of animals in a post arrival quarantine feedlot. Animals Australia reported the video and photographs showed pushing, punching, tail twisting and stabbing using a pocket knife on the unloading ramp, and cattle covered with dried faeces, with nasal discharge and in poor health in the post arrival feedlot.

#### **Department assessment**

The department confirmed the report involved a consignment of cattle and sheep exported by Livestock Shipping Services Pty Ltd (LSS). LSS discharged 10,167 cattle at Eilat, Israel starting on 9 May 2016 and completed on 11 May 2016. LSS and the Australian Government Accredited Veterinarian (AAV) accompanying this consignment were contacted to provide further information about this incident.

#### Unloading

The video showed animals repeatedly baulking in the unloading ramp, leading to non-compliant handling, including:

- Tail twisting of three different animals by stevedores.
- A stockperson striking an animal with an implement in a stabbing motion—the same animal had its tail twisted and bent, and was also dragged forward by its tail.

The department's assessment of the video was that the animal was not stabbed with a knife, but was subject to poor handling, non-compliant with required standards.

The stockperson in the video was the LiveCorp accredited stockperson, employed by LSS, who was supervising the unloading. The stockperson reported that a multi-tool was used to make the animal move forward on the ramp and a pocket knife was not used.

Due to previous animal welfare issues during unloading in Israel the department requires the shipboard AAV to supervise and report on unloading in their end of voyage report. The AAV reported that the LiveCorp accredited stockperson was supervising the unloading ramp and reported that the unloading went without an animal welfare incident. When contacted for further information, the AAV advised they were told about a difficult animal at the time, but this was not included in their report as the animal moved and unloading continued, with the unloading ramp monitored at all times.

#### Health and welfare in the feedlot

The photographs and video taken at the feedlot showed animals with dried faeces covering their coats and some animals with nasal discharge. The video also showed one animal salivating heavily and a second animal lying down, craning its neck and panting heavily.

The end of voyage report from the AAV recorded that of the 10,215 cattle loaded in Adelaide and Fremantle, 10,167 were discharged at Eilat, with 48 mortalities recorded (a mortality rate of 0.47 per cent). Of the recorded mortalities, 26 were attributed to Bovine Respiratory Disease (BRD).

The AAV reported that at unloading, 38 hospital cases that had been treated for BRD were clearly identified to the Israeli government veterinary representative with written instructions about treatments.

After the cattle were unloaded, they entered two different post arrival quarantine feedlots. LSS provided an Interim Processing Report for the consignment showing that of the 8,623 cattle entering the post arrival quarantine feedlot involved in this report, there were 141 cattle deaths during post arrival quarantine (1.4%) which lasted for 24 days. At a second quarantine feedlot 1,544 cattle entered the facility with 55 cattle deaths (3.6%) during quarantine that lasted for 18 days.

The department verified that pre-export vaccinations for infectious bovine rhinotracheitis/infectious pustular vulvovaginitis (IBR/IPV) (viral disease associated with BRD) were administered to all cattle within four months prior to shipment as required by

Israel. LSS used a combination vaccine Bovilis MH+IBR, which also protects against *Mannheimia haemolytica* (MH), the main bacterial BRD agent. LSS vaccinate against MH when preparing cattle for export to Israel to protect against the risk of BRD as part of their extended voyage management. The department verified that during the voyage additional antibiotics were on-board and an additional LSS-employed stockperson accompanied the livestock.

LSS advised that during unloading and over the following days, extreme heat was experienced in the area, with daily temperatures exceeding 40°C. This was unusual for this location and time of year. The department examined weather data from the area and confirmed the high temperatures. A veterinary consultant contracted by the importer visited the feedlot on 15 May 2016 and advised that the extreme heat contributed to the feedlot mortalities, and the animals may have been over-handled during the heat. LSS advised that hospital cases from the vessel were sent to the second quarantine feedlot. LSS advised cattle at this feedlot were predominantly British breeds, and were more affected by the heat, contributing to the higher mortality percentage at the second feedlot.

The feedlot in the Animals Australia report has been ESCAS approved for LSS cattle since October 2012. It was independently audited on 22 August 2015 and 5 June 2016 and found to be compliant with ESCAS animal welfare requirements. There have been no previous reports of non-compliance at this feedlot.

### **Corrective actions taken by exporter**

LSS reviewed the information provided by Animals Australia and agreed that non-compliant handling occurred during discharge. They identified issues that led to the non-compliant handling, including the ramp set-up and inexperience of stevedores. LSS noted that compliant use of an approved encouragement device, such as an electric cattle prod, could have prevented this non-compliant handling, but these were not being used at this port at the time of this report.

The following actions were taken by LSS in response to the non-compliant handling and associated issues:

- required the stockperson to attend an independent low stress stock handling training course and conducted a competency assessment post training
- updated discharge procedures and developed a pre discharge checklist for use by shipboard staff and importer. This includes diagrams for set up of the vessel ramp and discharge platform to reduce the risk of animals baulking during unloading, and a pre discharge meeting between AAV, accredited stockperson and importer
- engaged with the Israeli government, who have agreed that judicious use of acceptable encouragement devices such as flappers/animal talkers and electric prods will be allowed at the wharf
- the LSS supply chain manager supervised the unloading ramp for two of the next three consignments, to ensure compliant unloading. During unloading LSS staff engaged with

stevedores, demonstrating calm handling and providing training. No non-compliant handling was reported during the unloading of these vessels.

LSS is continuing to work with the Live Export Program (a joint initiative of Meat and Livestock Australia and LiveCorp) in Israel to expand and optimise the above training, procedural and infrastructure corrective actions over the next 12 months.

The following actions were taken in response to the health issues at the quarantine feedlot:

- the veterinary consultant who visited the feedlot provided advice on treatments for the affected animals
- feedlot staff were advised by the consultant not to move cattle during the heat of the day and to remove sick animals during early morning, to prevent further stress.

LSS reviewed feedlot handling processes during extreme heat events and advised that during extreme heat, a LSS stockperson will accompany cattle to the feedlot to ensure appropriate handling following discharge.

#### **Department actions and conclusions**

The department reviewed the information provided by LSS and accepted the corrective actions implemented by the exporter were adequate to address the non-compliance during unloading, and the health and welfare concerns in the feedlot.

The department has provided details of this incident to LiveCorp, who train and accredit shipboard stockpersons.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), the department recorded a *minor* non-compliance with ESCAS animal welfare requirements against the LSS Israel cattle supply chain.

## 4.2 KUWAIT

### Background

The Exporter Supply Chain Assurance System (ESCAS) was implemented in Kuwait on 1 March 2012.

As at 28 February 2017, a total of six consignments of livestock have been exported under ESCAS arrangements to Kuwait in 2017, including 99 cattle and 74 657 sheep. This makes Kuwait the second largest market for sheep and the smallest market for cattle by volume in 2017 to date. There are currently four Australian exporters with approved supply chains to export livestock to Kuwait with six feedlots and four abattoirs.

The department has previously published reviews of 13 reports relating to non-compliance in Kuwait. From these reports, 17 findings of non-compliance have been recorded against exporter supply chains and facilities. Five of the reports related to performance during Eid-al-Adha (Eid) between 2013 and 2015 (see Reports 21, 39/44, 84/85). In total, seven reports were received of non-compliance during 2015 (see Reports 61/68, 75/78, 84/85, 93). The reviews can be found at: <http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance>.

As at 28 February 2017, there are no reports of non-compliance under investigation for Kuwait.

During Eid, exporters and their representatives work together with Meat and Livestock Australia (MLA) to identify and address issues as they arise, as part of broader market support activities.

### Reports # 116 and 120: Sheep exported to Kuwait

#### Incident report

The Department of Agriculture and Water Resources received several reports of non-compliance with Exporter Supply Chain Assurance System (ESCAS) requirements in Kuwait during Eid-al-Adha (Eid) 2016, which ran from 11 to 13 September 2016.

On 12 September 2016 Emanuel Exports Pty Ltd (Emanuel) and Livestock Shipping Services Pty Ltd (LSS) each notified the department they had observed approximately 30 Australian sheep outside the approved supply chain at Al Rai Market on 11 September 2016. On 21 September 2016, Meat & Livestock Australia (MLA) reported they also observed 30 sheep at Al Rai Market on the same date as the exporters. MLA also observed one sheep trussed and loaded onto the back of a vehicle at this location.

On 23 September 2016, the department received a report from Animals Australia of non-compliance with ESCAS control and animal welfare requirements. The report stated on 11 September 2016 no less than 300 Australian sheep were available for private sale at Al Rai livestock market and Australian sheep were trussed and dragged or wheelbarrowed to car boots. The report also stated Australian sheep were slaughtered in a manner non-compliant with ESCAS welfare standards at an ESCAS approved abattoir. The report included video of sheep at the Al Rai market and at an approved abattoir.

### **Department assessment**

As all the reports and notifications were received around the same time and considered related they were combined for assessment. Two issues were identified in the combined reports—sheep outside the approved supply chain at Al Rai market where non-compliant handling was observed; and non-compliant slaughter at an approved abattoir.

Four exporters have approved supply chains in Kuwait, Emanuel, EMS Rural Exports Pty Ltd (EMS), International Livestock Exports Pty Ltd (ILE) and LSS. The department contacted all exporters of sheep to Kuwait, who were asked to respond to the information in the reports from MLA and Animals Australia. As Emanuel, EMS and ILE are related companies they provided one combined response.

The department reviewed consignment records and confirmed at the time of the report only Emanuel had sheep in Kuwait. Emanuel had two senior company representatives in Kuwait to provide support during Eid. LSS had no animals in Kuwait but advised they had staff in the country for supply chain engagement and support during Eid. The department noted that ILE also had no sheep alive in their Kuwait supply chain at the time of the reports.

### Al Rai Market

#### Department assessment

The department reviewed the information from exporters, MLA and Animals Australia and determined the animals at Al Rai Market were Australian sheep. The location was outside the approved supply chain and the sheep were sold in a manner non-compliant with ESCAS control and traceability requirements.

The video provided by Animals Australia showed 40 sheep in pens and four sheep removed from the market in private vehicles. The sheep were likely of Australian origin, based on identifying features including merino-type breed, tail-docking and mulesing. Without further information on the other 260 sheep reported by Animals Australia, the department was unable to confirm the total number of Australian sheep outside the supply chain.

#### Exporter review and actions

After identifying sheep outside the supply chain at Al Rai market, Emanuel implemented the following corrective actions:

- recovered the sheep at Al Rai market and returned them to the approved supply chain
- restricted the sale of sheep to the trader responsible for selling sheep outside the approved supply chain as outlined in their Supply Chain Management Plan (SCMP).

Exporters reviewed the video supplied by Animals Australia and confirmed the sheep observed at Al Rai market were the same as those reported by themselves and MLA.

ILE only exports Awassi and Awassi-cross breeds. The department accepted that no animals from this supply chain were involved in the observations of sheep outside approved supply chains.

### Abattoir slaughter

#### Department assessment

The abattoir identified in the reports is in the approved supply chains of all four exporters. The abattoir has a high risk rating and one previous report of non-compliance (Report #93).

A departmental veterinary officer experienced in auditing abattoirs reviewed the video of slaughter supplied by Animals Australia. The video showed the slaughter of nine sheep of Australian origin that was non-compliant with ESCAS animal welfare standards. Multiple cuts were used on all but one animal and the head was not kept in extension to prevent the wound edges touching.

During the 12 months before this incident the abattoir had been audited four times each by Emanuel and LSS, including an audit in August 2016. Subsequent to this non-compliance, audits have occurred in late September, November and December 2016. No non-compliance has been identified during audits.

#### Exporter review and actions

Emanuel and LSS reviewed the video taken at the abattoir and advised the slaughter did not meet the standards and procedures in place at the facility. They worked collaboratively to address the non-compliance and sent a consultant who met with abattoir management, reviewed ESCAS requirements and updated Standard Operating Procedures (SOPs) for handling and slaughter at the abattoir.

Emanuel acknowledged the sheep in the video were from their supply chain. In addition to the collaborative actions above, they also:

- contracted a consultant (in addition to the consultant used for both exporters) who held meetings with the approved abattoir's management to reinforce ESCAS requirements, and provided a report of corrective actions planned for Eid 2017
- provided further additional training to abattoir staff.

### **Department actions and conclusions**

Based on information from exporters, MLA and Animals Australia, the department determined there were at least 40 Australian sheep outside the approved supply chain at Al Rai Market, with some of these sold, handled and transported in a manner non-compliant with ESCAS control and traceability requirements.

The department determined the video from Animals Australia in the ESCAS approved abattoir showed the slaughter of nine animals that was non-compliant with ESCAS animal welfare requirements.

Previously published reports (#61/68, #75/78, #84/85 and #93) related to similar issues with animals being removed from the approved supply chain and non-compliant slaughter at an approved abattoir. As a result of these reports, Emanuel, EMS and ILE were required to implement a Supply Chain Management Plan (SCMP) and LSS was required to update their existing SCMP for sheep supply chains in Kuwait. The SCMPs incorporated corrective actions taken as a result of the reports from 2015 and includes comprehensive details of control and traceability systems, trader agreements, Eid preparations, on-going training and review.

The department accepted the SCMP was effectively implemented during Eid 2016. Exporter representatives were in market over Eid to monitor compliance with ESCAS requirements and prompt action was taken by Emanuel to address non-compliance at the time it was identified, consistent with their SCMP. These were the only reports of non-compliance in Kuwait during 2016.

The department required all sheep exporters to Kuwait to review and amend their SCMPs to include ongoing corrective actions undertaken as a result of these reports. The SCMPs include ongoing engagement and regular face to face training at abattoirs. In addition, the SCMPs include trader agreements with clearly outlined penalties for non-compliance with ESCAS requirements, including restricted supply of sheep.

Compliance with the SCMP is a condition of ESCAS approval. The department intends to audit exporters against their SCMP during 2017.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), the department recorded a *minor* non-compliance with ESCAS control, traceability and animal welfare requirements against the Emanuel Kuwait sheep supply chain and a *critical* non-compliance with animal welfare requirements against the abattoir.

## **4.3 LEBANON**

### **Background**

The Exporter Supply Chain Assurance System (ESCAS) was implemented in Lebanon on 23 December 2014.

As at 28 February 2017, no consignments of livestock have been exported under ESCAS arrangements to Lebanon in 2017. There is currently one Australian exporter with an approved supply chain to export livestock to Lebanon.

At the time of this report being received, there was one approved supply chain in Lebanon which included five feedlots and three abattoirs. No Australian sheep have previously been exported to Lebanon under ESCAS arrangements.

This supply chain was approved for one consignment only. No further consignments to Lebanon have been approved.

The department has not previously published a review of any reports relating to non-compliance in Lebanon.

As at 28 February 2017, there are no reports of non-compliance under investigation for Lebanon.

### **Report # 119: Sheep exported to Lebanon**

#### **Incident report**

On 23 September 2016, the Department of Agriculture and Water Resources received a report from Animals Australia about non-compliance with Exporter Supply Chain Assurance System (ESCAS) control, traceability and animal welfare requirements during Eid-al-Adha (Eid) in Lebanon, which ran from 11 to 13 September 2016.

Animals Australia reported:

- one sheep with its ear tag removed was sold to a member of the public from an ESCAS approved abattoir/feedlot (Facility 1) and transported in the boot of a car
- other non-compliant handling and slaughter was observed at Facility 1
- one thousand Australian sheep were observed at an unapproved abattoir/feedlot (Facility 2), with infrastructure and handling non-compliant with ESCAS animal welfare requirements.

## **Department assessment**

The facilities identified in the report were approved in the Fares Rural Exports Pty Ltd (Fares)—Lebanon sheep supply chain. Fares is the only exporter with an approved supply chain in Lebanon. This supply chain was approved in June 2016 for one consignment only.

The department assessed the video provided by Animals Australia and determined:

### At Facility 1:

- the sheep in the video were likely of Australian origin, based on identifying features including breed, tail-docking, mulesing, ear-tags and ear marks.
- handling, restraint, transport and slaughter was non-compliant with ESCAS requirements including:
  - sheep being dragged, lifted and flipped by their legs and horns
  - a sheep being trussed and removed from the facility in a car boot
  - a sawing motion was used during slaughter of two sheep
  - the head not kept in extension to prevent the wound edges touching post slaughter
  - use of an unapproved point of slaughter (slaughter on the floor when not approved)

At Facility 2, Australian sheep were shown in a feedlot pen. Based on global positioning system (GPS) and address details, the department confirmed the facility was approved, therefore the sheep were not outside the approved supply chain. However as animals were moved between levels of the facility using stairs, the department determined the infrastructure at Facility 2 did not meet ESCAS requirements.

The department reviewed Independent Performance Audit Reports (IPARs) for both facilities. The abattoir at Facility 1 was audited in September 2016. The feedlot and abattoir at Facility 2 were audited in July and August 2016 respectively. No non-compliance with ESCAS animal welfare or infrastructure requirements were identified during the audits.

## **Exporter response**

Fares did not have any representatives in-market during Eid. The company reviewed the video taken by Animals Australia and confirmed both Facility 1 and 2 were approved in their supply chain.

Fares initially stated the sheep seen in Facility 1 in the Animals Australia video were not exported from Australia. The department advised Fares that the non-compliances in the Animals Australia video, particularly the non-compliant slaughter, involved Australian animals from the Fares supply chain.

Fares confirmed with management from Facility 1 that ESCAS was understood, and Australian sheep were only to be processed in approved facilities and could not be sold

outside the approved supply chain. Fares implemented training to address the non-compliant handling and slaughter observed at Facility 1.

In February 2017 Fares advised the department that no sheep remained at Facility 2. Fares acknowledged sheep were moved down stairs and infrastructure improvements were pending.

### **Department actions and conclusions**

The department determined the animals shown in the Animals Australia video were exported from Australia, and handling, restraint, transport and slaughter at Facility 1 was not compliant with ESCAS requirements. It was confirmed Facility 2 was an approved facility, however the infrastructure at this facility was not compliant with ESCAS requirements because ramps were not available and sheep were moved between levels by stairs. The department notified the audit company of serious concerns about the audit on which approval of this facility was based—specifically not identifying that sheep were moved by stairs.

The department removed Facility 2 from the approved supply chain and placed additional conditions for managing all sheep remaining in the supply chain. This included that all sheep must be slaughtered under the direct supervision of a nominated Animal Welfare Officer and provision of weekly reconciliations and reports confirming ESCAS compliant slaughter.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), the department recorded a *critical* non-compliance with ESCAS control and animal welfare requirements against the Fares Lebanon sheep supply chain.

At the time of publishing, no further consignments to Lebanon were approved. The department will consider the findings of this report when considering any future ESCAS applications to Lebanon.

## 4.4 MALAYSIA

### Background

The Exporter Supply Chain Assurance System (ESCAS) was implemented in Malaysia on 1 September 2012. At the time of these reports being received, there were 14 approved supply chains in Malaysia for ten exporters.

As at 28 February 2017, a total of 42 consignments of livestock have been exported under ESCAS arrangements to Malaysia in 2017, including 717 cattle, 845 goats and 5 294 sheep. This makes Malaysia the third smallest market for cattle, only market for goats and the smallest market for sheep by volume in 2017 to date. There are currently ten Australian exporters with approved supply chains to export livestock to Malaysia with 149 feedlots and 78 abattoirs approved.

The department has previously published reviews of 12 reports relating to non-compliance in Malaysia. From these reports, six findings of non-compliance have been recorded against exporter supply chains. The reviews can be found at:

<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance>.

Previous reports include one report received from Animals Australia (#45), one report from Meat and Livestock Australia (MLA) (#80) and one self-report (#41) related to incidents occurring during Eid-al-Adha (Korban) in 2014 and 2015. These reports resulted in one major and two minor non-compliances being recorded against three exporter supply chains.

Due to the increased risk of non-compliance during Korban, exporters and their representatives work together with Meat and Livestock Australia (MLA) to identify and address issues as they arise.

As at 28 February 2017, there are no reports of non-compliance under investigation for Malaysia.

### **Report # 118: Cattle, Sheep and Goats exported to Malaysia**

#### **Incident report**

On 23 September 2016, the Department of Agriculture and Water Resources received a report from Animals Australia about non-compliance with Exporter Supply Chain Assurance System (ESCAS) control, traceability and animal welfare requirements during Eid-al-Adha (Korban) in Malaysia which occurred from 12 to 16 September 2016.

Animals Australia reported:

- Australian cattle, sheep and goats being sold to and slaughtered in non-approved facilities.
- Non-compliant handling and slaughter of Australian animals at both ESCAS approved and unapproved facilities.
- Sale of Australian animals to private buyers.

Animals Australia provided video and photographs taken at 14 facilities on 11 – 12 September 2016. Over 130 ear tag numbers along with four rump brands and 18 ear notches were provided, however substantially more animals were shown to be involved from the evidence provided.

### Department assessment

At the time of the complaint, ten exporters had approved sheep and goats and/or cattle supply chains in Malaysia:

<b>Exporter</b>	<b>Species</b>
Australian Rural Exports Pty Ltd (Austrex)	Cattle
Capricorn Pastoral (Capricorn)	Sheep and goats
Halleen Australasian Livestock Traders Pty Ltd (Halleen)	Cattle, sheep and goats
Ikhlas Holding Pty Ltd (Ikhlas)	Cattle, sheep and goats
International Livestock Exports Pty Ltd (ILE)	Cattle, sheep and goats
Independent Livestock Services Pty Ltd (ILS) (Approved at the time of the report as Jamie McMillan Brown (JMB))	Sheep and goats
Lembiru Livestock Pty Ltd (Lembiru)	Sheep and goats
North Australian Cattle Company Pty Ltd (NACC)	Cattle
P&D Exports Pty Ltd (P&D)	Sheep and goats
South East Asian Livestock Services Pty Ltd (SEALS)	Cattle

Department records indicate in the three months leading up to Korban 2016 the following consignments were exported:

- 4 consignments of 7,264 cattle
- 19 consignments of 11,001 goats
- 80 consignments of 21,685 sheep
- 1 consignment of 840 buffalo

Austrex had not exported animals to Malaysia since July 2015 and therefore did not have animals in Malaysia at the time of the report. Austrex has since closed their supply chains to Malaysia.

## A. Videos

The department determined the animals shown in the videos and photographs were exported from Australia due to breed characteristics, ear notching consistent with that used in Australia and the presence of National Livestock Identification System (NLIS) and export tags.

Three of the facilities identified in the videos were ESCAS approved facilities at the time, one was previously approved, and 10 facilities were unapproved.

Table 1 summarises the findings from the videos provided by Animals Australia. As the unapproved facilities are not in ESCAS supply chains, animal welfare non-compliance findings are not discussed—the ESCAS non-compliance is that Australian animals are present demonstrating loss of animals from approved supply chains.

*Table 1: Department assessment and findings of non-compliance in Animals Australia report*

Facility Number	Facility status	Department assessment	Findings of non-compliance with ESCAS
1	Approved for ILS and Ikhlas	<ul style="list-style-type: none"> <li>• Pulling and dragging sheep by their limbs and wool.</li> <li>• 'Sawing' motion used for slaughter.</li> <li>• Moving the animals post slaughter without checking for consciousness.</li> </ul>	<ul style="list-style-type: none"> <li>• Non-compliant handling, restraint and slaughter practices resulting in poor/adverse animal welfare outcomes.</li> <li>• Lack of consciousness checks performed.</li> </ul>
2	Approved for Halleen	<ul style="list-style-type: none"> <li>• One bull held in a restraint box for an extended period.</li> </ul>	<ul style="list-style-type: none"> <li>• Non-compliance with ESCAS animal welfare requirements.</li> </ul>
3	Approved for ILE and P&D	<ul style="list-style-type: none"> <li>• Lifting and dragging sheep and goats by the legs and horns.</li> <li>• 'Sawing' motion used for slaughter.</li> <li>• Post slaughter consciousness check not performed.</li> <li>• One goat with legs trussed, carried and placed into ute tray and sold to a private buyer.</li> </ul>	<ul style="list-style-type: none"> <li>• Non-compliant handling, restraint and slaughter practices resulting in poor/adverse animal welfare outcomes.</li> <li>• Selling animals outside approved supply chains.</li> <li>• Lack of consciousness checks performed.</li> </ul>
4	Unapproved (previously approved)	<ul style="list-style-type: none"> <li>• Penned Australian breeder cattle.</li> </ul>	<ul style="list-style-type: none"> <li>• No non-compliance.</li> <li>• ESCAS does not apply to breeders.</li> </ul>
5	Unapproved	<ul style="list-style-type: none"> <li>• Two goats individually tethered to fence by neck, struggling against restraint.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep and goats outside of approved supply chains.</li> </ul>

<b>6</b>	Unapproved	<ul style="list-style-type: none"> <li>• Trussed sheep, knelt on to restrain.</li> <li>• ‘Sawing’ motion used for slaughter of sheep.</li> <li>• Post slaughter consciousness check not performed on sheep.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep and goats outside of approved supply chains.</li> </ul>
<b>7</b>	Unapproved	<ul style="list-style-type: none"> <li>• Pulling and dragging sheep and goats by their limbs and wool.</li> <li>• ‘Sawing’ motion used for slaughter.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep and goats outside of approved supply chains.</li> </ul>
<b>8</b>	Unapproved	<ul style="list-style-type: none"> <li>• Sheep lifted by the head, horns and wool to load onto a truck.</li> <li>• Sheep restrained for an extended period prior to slaughter.</li> <li>• ‘Sawing’ motion used for slaughter of sheep with multiple cuts.</li> <li>• Interference with wound edges.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep and goats outside of approved supply chains.</li> </ul>
<b>9</b>	Unapproved	<ul style="list-style-type: none"> <li>• Pulling and dragging sheep and goats by their limbs, wool/skin and tail.</li> <li>• ‘Sawing’ motion used for slaughter with blunt knife.</li> <li>• Moving the animals post slaughter without checking for consciousness.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep and goats outside of approved supply chains.</li> </ul>
<b>10</b>	Unapproved	<ul style="list-style-type: none"> <li>• Australian sheep and goats observed for private sale.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep and goats outside of approved supply chains.</li> </ul>
<b>11</b>	Unapproved	<ul style="list-style-type: none"> <li>• Australian cattle, sheep and goats observed.</li> </ul>	<ul style="list-style-type: none"> <li>• Cattle, sheep and goats outside of approved supply chains.</li> </ul>
<b>12</b>	Unapproved	<ul style="list-style-type: none"> <li>• One ram hoisted on a beam using a neck rope post slaughter.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep outside of approved supply chains.</li> </ul>
<b>13</b>	Unapproved	<ul style="list-style-type: none"> <li>• Pulling and dragging sheep and goats by their limbs and wool.</li> <li>• Sheep with legs trussed. Kneeling on neck, stepping on legs to restrain and smacking head while legs are being tied.</li> <li>• ‘Sawing’ motion used for slaughter.</li> <li>• Hosing the animals with water post slaughter without checking for consciousness.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep and goats outside of approved supply chains.</li> </ul>

14	Unapproved	<ul style="list-style-type: none"> <li>• Pulling and dragging sheep by their limbs and wool.</li> <li>• Sheep with legs trussed. Kneeling on neck to restrain while legs are being tied.</li> <li>• 'Sawing' motion used for slaughter.</li> <li>• Moving the animals post slaughter without checking for consciousness.</li> </ul>	<ul style="list-style-type: none"> <li>• Sheep and goats outside of approved supply chains.</li> </ul>
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## B. Ear tags and rump brands

After reviewing the information provided by Animals Australia and exporters, the department determined:

- Ten tags (identified at facilities 1, 11, 12 and 14) were exclusively linked to consignments exported by ILS (JMB).
- Ten tags (identified at facilities 6, 8 and 9) were exclusively linked to consignments exported by ILE.
- Three tags (identified at facilities 9 and 10) were exclusively linked to consignments exported by P&D.
- One tag and one rump brand (identified at facility 4) were exclusively linked to recent exporter consignments, however the cattle observed appeared to be breeder cattle which had been at the facility for some time. ESCAS requirements do not apply to breeders and therefore facilities are not required to be ESCAS approved. No non-compliance was observed.
- One rump brand (identified at facility 11) was exclusively linked to consignments exported by NACC.
- 63 tags were either not complete, not traceable, or did not match any tags or PICs in any exporters' Property of Origin lists.
- 48 were duplicate tags seen at multiple locations and therefore are included in the searches above.

## C. Facility audits

At the time of the report two of the three approved facilities had a risk rating of *low* (last audited April 2015 and June 2016), the other had a risk rating of *medium* (last audited August 2016).

All initial and performance audit reports provided to the department for the three ESCAS approved facilities:

- confirmed the necessary infrastructure and training is present to hold Australian animals in accordance with ESCAS requirements
- confirmed no loss of traceability had occurred, and
- did not identify any non-compliance.

### **Department actions**

In response to the report and assessment, the department suspended seventeen facilities from all exporter supply chains including:

- the three approved facilities identified in the Animals Australia report, along with seven feedlots and abattoirs associated with these facilities
- a further seven facilities where non-compliance was identified as a result of exporter investigations.

### **Exporter actions**

Halleen, ILE, Lembiru, P&D and MLA all had representatives in Malaysia during Korban. Representatives visited approved facilities to monitor and oversee compliance with ESCAS requirements. However, no exporters or MLA representatives reported any non-compliance at the facilities they visited.

All information from Animals Australia was provided to all exporters to Malaysia for their investigation. Through review of traceability reports and internal investigations of their supply chains, exporters identified seven ESCAS approved facilities that sold animals outside of approved supply chains (to the facilities identified by Animals Australia). All facilities where non-compliance was identified were suspended. This included two facilities identified as providing falsified reconciliation documents showing animals were slaughtered in approved facilities.

After being notified of the non-compliance, ILE, Lembiru, NACC, P&D, took the following corrective actions:

- Suspended facilities which contributed to the loss of control reported by Animals Australia (the animals which were observed at unapproved facilities) by selling animals outside of the approved supply chain.
- Provided additional training in ESCAS requirements.
- Increased oversight of animals remaining in suspended facilities until slaughter.

Additional actions taken by P&D and NACC:

- Performed a full reconciliation of livestock and traceability data at facilities suspected to be responsible for loss of control.
- Implemented a schedule to perform more frequent internal audits.
- Improved and updated the Standard Operating Procedures (SOPs) at all facilities, including increasing the number of critical control points in relation to traceability, record keeping (at arrival, departure and slaughter) and handling and slaughter practices.
- Planned to increase exporter and importer representation during future Korban and other peak periods.

ILS (JMB) took the following corrective actions:

- Provided additional training in ESCAS requirements.
- Increased oversight of animals remaining in suspended facilities until slaughter was completed.

Capricorn, Ikhlas and SEALS investigated the Animals Australia report and found no non-compliance had occurred in their supply chains.

Halleen investigated the Animals Australia report and took no corrective actions in response to their findings. Halleen noted that they actively perform facility inspections in market and provides training on animal handling and welfare to staff at facilities.

### **Department conclusions**

The department determined

- the animals shown in the video and photographs were exported from Australia
- non-compliant handling and slaughter occurred at two approved facilities
- non-compliant handling occurred at one facility and
- animals were outside approved supply chains.

As a result of exporter investigations in response to the report, two facilities were identified to have provided falsified reconciliation documents showing that livestock were slaughtered in ESCAS approved facilities.

The information provided by Animals Australia demonstrates substantial numbers of livestock were moved outside approved supply chains, with six of the ten exporters to the market affected by non-compliance identified as a result of this report. This raised concerns

for the department that exporter control and traceability systems in place in Malaysia were ineffective. In determining the level of non-compliance against each exporter the department considered proactive action taken by exporters over Korban, their response to investigating the report from Animals Australia and the numbers of animals exported to Malaysia.

The department has previously received three reports of non-compliance with ESCAS requirements during Korban in Malaysia (reports #41, 45 and 80). Each of these reports involved movement of animals outside approved supply chains. In response to these reports, industry developed standards for accountability, traceability and oversight for sheep and goats exported to Malaysia. All Malaysia exporters agreed to these standards in June 2016.

In addition to the immediate regulatory action taken, the department intends to conduct audits of all exporters' control and traceability systems for Malaysia supply chains against the industry standards and ESCAS requirements. Follow-up audits will be completed to determine the effectiveness of exporter corrective actions implemented to address any issues identified at the initial audit.

The department will also require all exporters to Malaysia to prepare a management plan for Eid 2017 to address the issues identified in this report.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), the department recorded:

- a *critical* non-compliance with ESCAS control, traceability and animal welfare requirements for sheep and goats against the ILS Malaysia supply chain.
- a *major* non-compliance with ESCAS control, traceability and animal welfare requirements for sheep and goats against the ILE Malaysia supply chain.
- a *major* non-compliance with ESCAS control, traceability and animal welfare requirements for sheep and goats against the P&D Malaysia supply chain.
- a *minor* non-compliance with ESCAS animal welfare requirements for cattle observed at facility 2 against the Halleen Malaysia supply chain.
- a *minor* non-compliance with ESCAS control, traceability and animal welfare for sheep and goats against the Lembiru Malaysia supply chain.
- a *minor* non-compliance with ESCAS control and traceability requirements for cattle against the NACC Malaysia supply chain.

The department will consider the findings of this report when assessing any future applications to add the unapproved and suspended facilities to an exporter's supply chain.

Immediate and ongoing measures and corrective actions implemented by exporters and the department will continue to be monitored for effectiveness.

Since the initial report the department has reapproved Facility 1 following corrective actions and facility upgrades implemented by the importer, along with the assessment and review of the effectiveness of these actions. The facility has been reapproved with a risk rating of *high*.

## **Report # 124: Sheep exported to Malaysia**

### **Incident report**

On 25 October 2016, the Department of Agriculture and Water Resources received a self-report from Independent Livestock Services (ILS) (formerly Jamie McMillan Brown) advising of non-compliance with their Exporter Supply Chain System (ESCAS) control and traceability requirements in Malaysia.

On 12 May 2016, 95 sheep were stolen from an approved feedlot/abattoir in Malaysia. ILS advised that police apprehended the suspect in July 2016, however none of the stolen sheep could be located or recovered. ILS provided a copy of the police report to the department.

### **Exporter actions**

The sheep theft was identified following investigation of the ILS supply chain in response to [Report 118](#). The importer (who is also the facility owner) notified ILS of the robbery on 21 October 2016.

ILS amended their contract with the importer to clarify reporting requirements under ESCAS to ensure that any events such as this were reported to them in the future.

ILS employed an Animal Welfare Officer (AWO) to oversee their whole Malaysia supply chain in market.

### **Department assessment**

The feedlot/abattoir was first approved in November 2014. The feedlot/abattoir has not been involved in any previous reports of non-compliance. All previous performance audit reports have not identified any non-compliance.

At the time of the theft, the feedlot/abattoir was in the supply chains of two exporters— ILS and Ikhlas Holdings Pty Ltd (Ikhlas). Ikhlas has not sent livestock to the importer since November 2014, and had no animals in the facility at the time of the robbery.

The feedlot/abattoir where the sheep were stolen from is associated with 'Facility 1' in report #118, and as such, the department suspended the feedlot/abattoir in October 2016.

The department removed the feedlot/abattoir from all exporter supply chains November 2016 following confirmation that no Australian animals remained in the facility.

Between the date of the theft and the importer's notification of the robbery to ILS, over 4000 ILS sheep were sent to the importer's facilities.

At the time of publishing, the facility remains suspended.

### **Department actions and conclusions**

The department noted the theft of the sheep was outside the control of the exporter, however the delay in identifying and reporting the theft indicated critical failure of control and traceability in the supply chain. In response, the department applied the following conditions to the ILS supply chain, including:

- The appointment of a dedicated, trained and competent AWO for each importer to oversee control, traceability and animal welfare requirements.
- Development and implementation of Standard Operating Procedures (SOPs) for traceability processes at all facilities in the supply chain.
- Provision of weekly post-export movement data, traceability reports and AWO reports to the department for all consignments.

The department also required ILS to review and verify the traceability data provided by importers and facilities, and notify the department immediately of any issues, discrepancies, errors or any other failure in the exporter or importers' control or traceability systems.

The department intends to audit all exporters to Malaysia for compliance with ESCAS control and traceability requirements and the industry Malaysia Control and Traceability Standards for Sheep and Goats.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), the department recorded a *critical* non-compliance with ESCAS reporting requirements against the ILS sheep and goats supply chain to Malaysia.

## 4.5 OMAN

### Background

The Exporter Supply Chain Assurance System (ESCAS) was implemented in Oman on 1 September 2012. At the time of these reports being received, there were three approved supply chains in Oman for three exporters.

As at 28 February 2017, a total of two consignments of livestock have been exported under ESCAS arrangements to Oman in 2017, including 9 741 sheep. This makes Oman the second smallest market for sheep by volume in 2017 to date. There are currently three Australian exporters with approved supply chains to export livestock to Oman with six feedlots and four abattoirs approved.

The department has previously published reviews of five reports relating to non-compliance in Oman (#13, #42 and #79/86/87). From these reports, two findings of non-compliance have been recorded against exporter supply chains. Both of these related to non-compliance during Eid. The reviews can be found at:

<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance>.

During Eid exporters and their representatives work together with Meat and Livestock Australia (MLA) to identify and address issues as they arise, as part of broader market support activities before, during and after Eid.

As at 28 February 2017, there are no reports of non-compliance under investigation for Oman.

### Reports # 115 and 122: Sheep exported to Oman

#### Incident Report

The Department of Agriculture and Water Resources received several reports of non-compliance with Exporter Supply Chain Assurance System (ESCAS) requirements in Oman during Eid-al-Adha (Eid) 2016, which ran between 11 and 13 September 2016.

The department received two reports and several notifications from Emanuel Exports Pty Ltd (Emanuel), EMS Rural Exports Pty Ltd (EMS) and Breedex Australia Pty Ltd (Breedex) (approved at the time of the report as Central Pacific Livestock Pty Ltd) about non-compliance with ESCAS control, traceability and animal welfare requirements in Oman. The reports were received between 9 and 27 September 2016 and included details of large numbers of Australian sheep with ear tags removed, a document indicating some sheep at Sohar Livestock Market came from the United Arab Emirates (UAE) and two ear tag numbers from Australian sheep arriving at an approved abattoir from an unknown source.

On 21 September 2016, Meat and Livestock Australia (MLA) reported:

- At least 15 live Australian sheep and some Australian sheep skins were observed at an unapproved abattoir. Handling was reported as calm and compliant, and the facility well organised.
- Eighty Australian sheep observed offered for private sale at Al Harm livestock sales area.
- One Australian sheep trussed and removed in a private vehicle at an approved abattoir.
- Approximately 102 sheep arriving in private vehicles, the majority from unknown locations, some of them trussed, at three different approved abattoirs. One partial ear tag number was provided from an animal arriving at one of these approved abattoirs.
- Many of the sheep observed had ear-tags removed.

Animals Australia provided initial notification on 15 September 2016, followed by an official complaint on 27 September 2016 reporting breaches of ESCAS documented on or before 15 September 2016, including:

- At least 700 Australian sheep at Sohar Livestock Market, and from a truck at Al Khabourak Livestock Market, Australian sheep being sold to the public for home slaughter with numerous observations of handling, transportation, restraint and exposure to adverse weather conditions non-compliant with ESCAS requirements.
- Most of the sheep observed for sale at these markets had ear tags removed.
- Photographs and video were provided to support the claims. One ear tag could be seen in a photograph.

### **Department assessment**

All reports were received around the same time and were combined for assessment in one report. The issues identified in the combined reports were:

- at least 700 sheep observed for sale at livestock markets and outside approved supply chains
- non-compliant handling and transport of sheep outside approved supply chains
- one sheep trussed and removed from an approved abattoir and
- unapproved movement of sheep from UAE to Oman.

At the time of these observations, the three exporters that had approved sheep supply chains in Oman – Emanuel, EMS and Breedex – had exported sheep in the six months prior to Eid 2016. There were approximately 81,000 sheep exported to Oman during this period, with the majority exported by Emanuel.

The department contacted all exporters of sheep to Oman and UAE (due to the report of cross border movement) and asked them to respond to information in the reports from Animals Australia and MLA. The department requested the exporters to supply property of origin lists for checking against the ear tags provided in the reports.

The three ear tag details provided in the reports by exporters and MLA were National Livestock Identification System (NLIS) tags showing property identification codes (PICs). The tags were reviewed against the property of origin lists supplied by exporters, however they could not be linked to any consignments exported to Oman or UAE during the previous six months. The department attempted to enhance the clarity of the ear tag in the photograph from Animals Australia, but could not successfully read the PIC.

The photographs and video provided by Animals Australia and information from MLA confirmed handling and transport non-compliant with ESCAS requirements, and confirmed Australian sheep outside approved supply chains being sold to the public for private slaughter at three locations – Al Harm livestock sales area, Sohar Livestock Market and Al Khabourak Livestock Market. The information from MLA and exporters confirmed Australian sheep were outside approved supply chains at the unapproved abattoir. Without further information on the sheep reported, the department was unable to confirm the total number of Australian sheep outside the supply chain.

Information from MLA confirmed that at least one animal was trussed and removed from an approved abattoir in a private vehicle, presumably for home slaughter. During the 12 months before this incident, the approved abattoir had been audited six times. The most recent audit before Eid was conducted on 24 August 2016. It was subsequently audited on 13 December 2016. No non-compliance with handling, control or traceability has been identified during audits.

The information about unapproved cross-border movement of sheep from UAE into Oman could not be substantiated.

### **Exporter review and actions**

Emanuel (also on behalf of EMS) had representatives in Oman during Eid to monitor compliance with ESCAS requirements during this high risk period. Emanuel acknowledged they had lost control of animals from their supply chain at the Sohar Livestock Market and took immediate action. The trader responsible for selling sheep outside the approved supply chain was identified and supply of sheep to this trader was halted, and the remaining sheep processed with additional oversight.

Emanuel stated they had no knowledge of sheep observed at the Al Khabourak Livestock Market or of a livestock market in this location.

Department records show Emanuel and EMS had exported 64,000 sheep in total to Oman prior to Eid, and had four approved feedlots and five approved abattoirs in their supply chains at the time.

Both Emanuel and MLA advised that during Eid, representatives intervened and took immediate corrective actions to address non-compliant transport, handling and restraint (trussing) where it was observed. Sheep were also removed from an approved abattoir prior to the high-risk period on the first day of Eid.

Post Eid, Emanuel has worked with facility managers to improve the infrastructure, equipment and policies at abattoirs in Oman. This includes:

- improving lairage facilities at one approved abattoir
- increasing number of trolleys available to move sheep around facilities
- increasing the number of vehicles with stock crates for moving sheep over larger distances
- working with Municipal authorities to introduce regulation of the handling and transport of Australian sheep
- continuing to pursue carcase-only sales to limit individual customers interacting with live sheep

Breedex also had representatives in Oman during Eid to monitor compliance with ESCAS requirements. Breedex advised they supplied only one approved feedlot and one approved abattoir during Eid, and removed sheep from the abattoir prior to the high-risk period on the first day of Eid. They maintained that none of the sheep involved in the observed non-compliance were consistent with the animals they had exported. The department confirmed that Breedex exported 17,240 sheep to Oman prior to Eid, and had three approved feedlots and four approved abattoirs in their supply chain.

The source of sheep observed outside of approved supply chains - at the unapproved abattoir – Al Harm Livestock Area and Al Khabourak Livestock Market could not be identified as no ear tags could be linked to any approved supply chains.

### **Department actions and conclusions**

The department concluded the sheep identified in the reports were of Australian origin, were exported under ESCAS arrangements and were found outside approved supply chains. It is unlikely sheep privately sold were slaughtered in a manner compliant with ESCAS animal welfare requirements. The photographs and video provided demonstrated animal handling and transport non-compliant with ESCAS animal welfare requirements.

Emanuel acknowledged that loss of control and traceability was identified in their supply chain.

Previously published reports from Eid 2015 (combined reports #79, #86, #87) related to similar issues with animals being removed from the approved supply chain and non-compliant handling. As a result of these reports, the department required all exporters to prepare a Pre-Eid Plan and a Supply Chain Management Plan (SCMP). The SCMP includes comprehensive details of control and traceability systems, trader agreements, Eid preparations, on-going training and review. Compliance with the SCMP is now a requirement of ESCAS approval and will be audited by the department.

The department accepted the corrective actions implemented by the exporter were consistent with their Pre-Eid Plan and SCMP and adequate to address the non-compliance.

Exporter representatives were in market over Eid to monitor compliance with ESCAS requirements and implement corrective action, consistent with their SCMP.

The department acknowledged immediate and on-going corrective actions have been taken by exporters, and considers these are adequate to address the non-compliance. No additional conditions were applied.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), the department recorded a *major* non-compliance with ESCAS control, traceability and animal welfare requirements against the Emanuel supply chain to Oman. No findings were made about the Breedex or EMS supply chains.

## **4.6 UNITED ARAB EMIRATES**

### **Background**

The Exporter Supply Chain Assurance System (ESCAS) was implemented in United Arab Emirates on 1 September 2012.

As at 28 February 2017, a total of three consignments of livestock have been exported under ESCAS arrangements to United Arab Emirates in 2017, including 13 451 sheep. This makes United Arab Emirates the third smallest market for sheep by volume in 2017 to date. There are currently four Australian exporters with approved supply chains to export livestock to United Arab Emirates with three feedlots and 15 abattoirs approved.

The department has previously published reviews of four reports relating to non-compliance in United Arab Emirates. All reports relate to performance during the annual Eid festival (see Reports 28, 40, 88/89). From these reports, seven findings of non-compliance have been recorded against exporter supply chains. The reviews can be found at:

<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance>.

During Eid, exporters and their representatives work together with Meat and Livestock Australia (MLA) to identify and address issues as they arise as part of broader market support activities.

As at 28 February 2017, there are no reports of non-compliance under investigation for United Arab Emirates.

### **Reports # 114 and 117: Sheep exported to United Arab Emirates**

#### **Incident Report**

The Department of Agriculture and Water Resources received three reports of non-compliance with Exporter Supply Chain Assurance System (ESCAS) requirements in the United Arab Emirates (UAE) during Eid-al-Adha 2016 (Eid) which ran from 11 to 13 September 2016

On 13 September 2016, Emanuel Exports Pty Ltd (Emanuel) notified the department that Australian sheep were observed being placed in private vehicles, and not proceeding to approved slaughter facilities. Full details are provided in report from MLA below.

On 20 September 2016, the department received a report from Animals Australia detailing non-compliance with ESCAS control and animal welfare requirements. The report included ear tag numbers, photos and links to videos. The report stated that on 11 September 2016:

- No less than 300 Australian sheep were observed for sale outside approved supply chains and non-compliant animal handling practices were observed at Dubai Livestock Market. One ear tag number was provided.
- No less than 140 Australian sheep were observed for sale outside approved supply chains and non-compliant animal handling practices were observed at Al Ain Livestock Market, with animals placed in car boots and open ute trays. Two ear tag numbers were provided.
- No less than 60 Australian sheep were observed for sale outside approved supply chains and non-compliant animal handling practices were observed At Sharjah Pet and Livestock Market.

On 21 September 2016, MLA reported they had observed non-compliance with ESCAS control and traceability and animal welfare requirements (report # 117). The report stated that on 12 September 2016:

- Non-compliant animal handling and transport was observed at two separate approved abattoirs. This included sheep being dragged by legs, trussed and moved in wheel barrows, trussed and left on the ground and slaughtered on the floor instead of slaughter boxes.
- Three sheep were removed from a third approved abattoir where no docket reconciliation system appeared to be operating between traders and the approved slaughter point. The following day, at least 11 sheep were observed loaded in private vehicles and removed from the same approved facility, or not arriving at the approved slaughter point.

### **Department assessment**

All reports concerned non-compliance during Eid, so have been included in this assessment. The issues identified in the combined reports were animals being removed from the approved supply chain and non-compliant handling occurring at approved abattoirs.

Three exporters – Emanuel, EMS Rural Exports Pty Ltd (EMS) and Livestock Shipping Services (LSS) – received approvals to export sheep to the UAE during the seven months leading up to Eid in 2016. Over 93,000 sheep were exported.

The department contacted these exporters and requested property of origin lists for consignments exported to UAE during the seven months prior to September 2016 for checking against the tag numbers provided. Exporters were asked to respond to information in the reports from Animals Australia (videos and photographs) and MLA. As Emanuel and EMS share operations in UAE they provided one response.

The video provided by Animals Australia showed multiple examples of Australian sheep being handled and transported by methods non-compliant with ESCAS animal welfare requirements at three separate livestock markets. This included sheep being dragged by the leg, lifted by horns, trussed and being put into boots and trays of private vehicles.

The department assessed the photographs of ear tags and ear tag numbers provided by Animals Australia. The assessment included attempts to enhance the clarity of the photographs. It was determined:

- Four tags were National Livestock Identification System (NLIS) tags, providing three identification codes (PICs) for properties identified through brand or name (one tag could not be read).
- The three PICs were linked to Emanuel consignments, identifying one animal at Dubai Livestock Market and two at Al Ain Livestock Market.
- None were linked to EMS or LSS consignments.

Without further information on the other sheep reported by Animals Australia at Dubai Livestock Market and Al Ain Livestock Market, the department was unable to confirm the total number of Australian sheep outside the supply chain.

For the sheep reported at Sharjah Pet and Livestock Market, the department considered the animals were Australian, but due to lack of ear tags, was unable to determine which approved supply chain these animals were from.

The handling of animals at ESCAS approved abattoirs as reported by MLA and the exporters was not compliant with ESCAS requirements. Based on department records and information from exporters and MLA, the department determined that sheep from both the Emanuel and LSS supply chains were in the two approved abattoirs at the time of the report.

As a result of the performance of UAE supply chains during Eid in 2015 (see Reports #88 and #89), the department raised the risk ratings of facilities in the UAE to high in November 2015, requiring them to be audited four times a year. The department also reviewed the Independent Performance Audit Reports from the approved abattoirs involved in the non-compliant handling. Audits occurred before Eid on 30 August 2016 and after the reports on 27 September 2016. No non-compliance was identified and animal handling was compliant with ESCAS requirements during the audits.

### **Exporter review and actions**

Emanuel had representatives in the UAE during Eid to monitor ESCAS compliance. Emanuel acknowledged the two ear tags from Animals Australia at Al Ain livestock market were from their supply chain. At Dubai livestock market and Al Ain livestock market, Emanuel had separately identified traders selling sheep outside the approved supply chain and suspended the supply of sheep to these traders as outlined in their Supply Chain Management Plan (SCMP).

At the two approved abattoirs where non-compliant handling was observed, the sale, movement and slaughter of sheep was suspended during the peak of customers on the first day of Eid. Representatives met with abattoir management as soon as the non-compliance was observed and reviewed the standards and procedures to be followed for the handling

and restraint of Australian sheep. Sales did not resume until appropriate equipment was available for compliant movement and handling, and operations were closely monitored.

LSS had a limited number of sheep in UAE during Eid 2016 with oversight provided by the in-market Supply Chain Manager. They advised they did not supply sheep to the approved abattoir or livestock markets where loss of control and traceability was identified.

Immediate corrective action was taken when alerted to non-compliant handling at the two approved abattoirs, with the sale, movement and slaughter of sheep suspended during the peak of Eid customers, resuming later in the day.

Post Eid, Emanuel (also representing EMS) and LSS both contracted consultants to visit facilities in the UAE during November and December 2016. They met with management at abattoirs and reviewed the reports of non-compliant handling, reviewed ESCAS requirements and implemented additional communication strategies to reinforce the Standard Operating Procedures to all staff.

Both Emanuel and LSS advised the department they are working with importers and authorities from all municipalities in the UAE. This includes pursuing strategies to prevent animals being removed from supply chains and prevent non-compliant handling and transport at approved facilities. Strategies implemented to date include:

- The Abu Dhabi Municipality has indicated they intend restricting the approved facilities where Australian sheep will be available and processed during Eid to those with upgraded equipment and automation.
- The Al Ain Municipality has erected signage at their facilities advising that Australian sheep must be slaughtered at the approved abattoirs and handled appropriately, including providing appropriate transport to the abattoir.

Emanuel have implemented additional strategies to prevent animals leaving the approved supply chain and prevent non-compliant handling within facilities. This includes:

- An abattoir with updated equipment has been constructed and approved at the feedlot in their supply chain, following municipality approval in 2015 (as advised in Report #88 and #89), allowing the supply and processing of sheep in a closed loop system.
- On-going development and promotion of a phone application where private customers can order a carcass for home delivery. A soft launch in 2016 was successful and sales via the app are expected to increase for Eid 2017.
- Engagement with charitable organisations for carcass only sales during Eid.

### **Department actions and conclusions**

The department determined Australian sheep were outside the approved supply chain at Al Ain and Dubai livestock markets and non-compliant handling occurred at two approved abattoirs during Eid 2016.

Previously published reports #88 and #89 related to similar issues with animals being removed from the approved supply chain and non-compliant handling. As a result of these reports Emanuel, EMS and LSS were required to provide a Pre-Eid Plan to the department and prepare a Supply Chain Management Plan (SCMP) for sheep supply chains in the UAE. The SCMPs incorporated corrective actions taken as a result of the reports from Eid in 2015 and includes comprehensive details of control and traceability systems, trader agreements, Eid preparations, on-going training and review.

The department accepted the Pre-Eid Plan and SCMP were effectively implemented during Eid 2016. Exporter representatives were in market over Eid to monitor compliance with ESCAS requirements and implement corrective action, consistent with their SCMP.

Following the reports received during Eid 2016 exporters have updated their SCMP with further corrective actions including ongoing engagement and training activities in the UAE. The department also intends to audit exporters against their SCMP.

The department acknowledged immediate and on-going corrective actions have been taken by exporters, and considers these are adequate to address the non-compliance. No additional conditions were applied.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), the department recorded a *major* non-compliance with ESCAS control and animal welfare requirements against the Emanuel UAE sheep supply chain and a *minor* non-compliance with ESCAS animal welfare requirements against the LSS UAE sheep supply chain.

## **4.7 VIETNAM**

### **Background**

The Exporter Supply Chain Assurance System (ESCAS) was implemented in Vietnam on 31 December 2012.

As at 28 February 2017, a total of nine consignments of livestock have been exported under ESCAS arrangements to Vietnam in 2017, including 479 buffalo and 17 799 cattle making it the largest market for buffalo and the second largest for cattle by volume in 2017 to date. There are currently ten Australian exporters with approved supply chains to export livestock to Vietnam.

The department has previously published reviews of 34 reports (including seven sub-reports) relating to non-compliance in Vietnam. From these reports, 35 findings of non-compliance have been recorded against exporter supply chains and facilities. The reviews can be found at: <http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance>.

As at 28 February 2017, there are four reports of non-compliance under investigation for Vietnam.

### **Report # 125: Cattle exported to Vietnam**

#### **Incident report**

On 7 November 2016, Department of Agriculture and Water Resources received a self-report from International Livestock Export Pty Ltd (ILE) about non-compliance with Exporter Supply Chain Assurance System (ESCAS) requirements in Vietnam. Thirteen cattle escaped from one of their ESCAS approved feedlots in Vietnam. Bad weather and persistent rain over a number of days caused significant soil erosion which led to collapse of a cement wall in the feedlot on the night of 30 October 2016. Cattle escaped the feedlot through the broken wall on the same night.

Following the report of storm damage to the feedlot, ILE in-market staff visited the feedlot and provided assistance to repair broken pens and the cement wall. The operator of the feedlot conducted a search to recover the escaped animals as soon as they were found missing, however the animals were not located or retrieved. A full reconciliation of cattle in the feedlot was completed and (radio frequency identification device) RFID numbers of 12 of the 13 missing cattle were provided. The missing animals were also reported to authorities.

## **Department assessment and conclusions**

At the time of the report, the feedlot was approved in the supply chains of four other exporters. An initial audit for ILE was conducted on 18 November 2015 and the feedlot was added to the ILE supply chain on 15 December 2015. The feedlot was audited for ILE on 29 September 2016 and again following this report on 13 December 2016.

Department records indicate at the time of this report there was over 6000 ILE cattle and over 9000 Australian cattle in the feedlot.

The department requested further information from ILE about the incident. It was confirmed that the cattle escaped from a small pen holding a known number of animals enabling the facility to quickly determine the number of missing animals. A full reconciliation of all ILE cattle in the feedlot was completed in an attempt to locate the missing RFID, however, this was not located. ILE noted this animal may not have been scanned or recorded upon entry to the feedlot and confirmed they reviewed the procedures for scanning and recording individual animals with the feedlot operator.

This feedlot has been involved in one previous non-compliance reported to the department in April 2015 (Report #99). As a result of compliance investigation # 99, the facility risk rating was increased from medium to high. Subsequent to report #99 the importer involved in this investigation was suspended.

The department concluded the loss of 13 cattle in this report most likely occurred as a result of a high rain fall event as reported by ILE. The corrective actions implemented by the exporter were appropriate and no additional conditions were applied.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), no non-compliance was recorded against ILE's Vietnam cattle supply chain.

## **Report # 128: Cattle exported to Vietnam**

### **Incident Report**

On 13 December 2016, the Department of Agriculture and Water Resources received a self-report from Australian Rural Exports Pty Ltd (Austrex) about non-compliance with Exporter Supply Chain Assurance System (ESCAS) animal welfare requirements for cattle exported to the Vietnam.

Austrex advised that on 7 December 2016, non-compliant animal welfare practices were observed during an independent performance audit (IPAR) at an approved abattoir. An animal's tail was broken in an attempt to make it move to the restraint box. When this failed, a neck rope was used to pull the animal into the box.

The auditor also observed that the abattoir did not have Standard Operating Procedures (SOPs) for slaughter of Australian cattle on site at the time of the audit as required under ESCAS.

### **Exporter Actions**

After identifying the non-compliance, Austrex implemented the following corrective actions:

- Notified the importer to cease further supply of Australian livestock to the abattoir.
- Requested the abattoir be removed from their supply chain.

Between the audit and provision of the audit findings to Austrex, ten Austrex animals were slaughtered under the supervision of facility and importer AWOs. Two Austrex cattle remained at the abattoir at the time the department was notified. All twelve cattle were reported as slaughtered in accordance with ESCAS animal welfare requirements.

### **Department assessment**

At the time of the audit, the abattoir was approved in the supply chains of three exporters – Austrex, Frontier International Northern Pty Ltd (FIN) and International Livestock Exports Pty Ltd (ILE). No other exporters' cattle were at the abattoir.

The abattoir was first approved in July 2015. The abattoir has not been involved in any previous reports of non-compliance, and all previous IPARs have shown no non-compliance. The last compliant audit was completed May 2016.

### **Department actions and conclusions**

The IPAR identified non-compliance with ESCAS animal welfare requirements and demonstrated that audit systems in place were able to identify the non-compliance. Austrex reported the incident in a timely manner and implemented corrective actions that addressed the issues.

The department suspended the supply of all Australian livestock to the abattoir on 15 December 2016 and removed it from all exporter supply chains once it was confirmed that no Australian livestock remained at the facility.

In assessing this matter against the guidelines for management of non-compliance (<http://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/regulatory-framework/compliance-investigations/non-compliance>), the department recorded a *major* non-compliance with ESCAS animal welfare requirements against the abattoir.

## 5 SUMMARY OF REVIEWS IN PROGRESS AS AT 28 FEBRUARY 2017

Table 7 provides an overview of all regulatory performance reviews in progress as at 28 February 2017. The status of all reviews can be found on the department's website [www.agriculture.gov.au/export/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance](http://www.agriculture.gov.au/export/live-animals/livestock/regulatory-framework/compliance-investigations/investigations-regulatory-compliance).

*Table 7 Summary of ESCAS regulatory performance reviews in progress as at 28 February 2017*

<b>Web #</b>	<b>Market</b>	<b>Species</b>	<b>Report</b>	<b>Date</b>	<b>Received from</b>
121	Vietnam	Cattle	Animal welfare concerns	September 2016	Self-reported by exporter
123	Vietnam	Cattle	Loss of control and traceability, animal welfare concerns	October 2016	Self-reported by exporter
126	Vietnam	Cattle	Loss of control and traceability	November 2016	Self-reported by exporter
129	Turkey	Cattle	Animal welfare concerns	December 2016	Self-reported by exporter
132	Vietnam	Cattle	Animal welfare concerns	January 2017	Third Party Report
133	Israel	Cattle	Animal welfare concerns	February 2017	Animals Australia