

RSPCA AUSTRALIA

# Independent Observer Report Analysis - Live Sheep Export Journeys 2018-2023

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## Introduction

In recent years, and as part of efforts to argue against the pending legislative phase out of live sheep export, those in favour of the trade have increasingly claimed that the historic animal welfare issues that have plagued the practice have now been resolved. However, scientific research papers and reports continue to identify ongoing risks to animal welfare and stressors that occur on board live sheep export vessels [1][2]. The publicly available information regarding the conditions and events that occur on live sheep export vessels departing Australia is limited to reports from the Australian Government “Independent Observer” program. In order to assess the conditions on board live sheep export vessels in Australia since 2018 and determine if the risks identified in published research papers still exist today, RSPCA Australia collated and analysed data from these reports.

## Background

The Independent Observer (IO) program was instigated in 2018 following the Awassi Express disaster in 2017. In that time, 53 of a reported 172 journeys between April 2018 and May 2023 that were carrying live sheep had an IO on board. IOs are employed by the Department of Agriculture Fisheries and Forestry (DAFF) as the regulator of the trade. According to the DAFF compliance statement [3] their role is “to monitor and review livestock management practices during export voyages to ensure animal welfare standards are being met”. This statement also states that “the primary purpose of the [IO] program is to provide assurance that the welfare of animals being transported on ships is being appropriately and humanely managed in accordance with the relevant standards and requirements.”

## Methodology

All 53 IO reports available from live export journeys carrying sheep on board between April 2018 (the first IO report published – report 01) and May 2023 (the most recent IO report published – report 238) were analysed. Key data was recorded and collated in a Microsoft SharePoint list, which acts similar to a Microsoft Excel spreadsheet. SharePoint was utilised as it allowed multiple entries into a single cell whilst still being easily searchable. The published reports used for the collection of data are available either on the DAFF website[4] or older records as archived on Trove[5]. The following sheep data was extracted and recorded from reports:

Measure/data point	Units/Explanation
Departure Date	Date of final departure from Australia
Departure location	Multiple loading points listed where relevant
Vessel Name	Name of vessel as listed in IO report
Arrival location	Multiple unloading points listed where relevant
Total duration of the journey	Days as reported in the IO report
Total number of sheep	As reported in the IO report
Sheep mortality	% of total sheep loaded
Sheep mortality	Total number of sheep deaths reported
Reported causes of sheep death	List of reported causes, where included in IO report (or listed as 'not reported')
Reported causes of sheep illness/injury or need for treatments	List of reported causes, where included in IO report (or listed as 'not reported')
Heat stress/indicators of heat stress as reported by the IO	Yes/No per voyage
Heat stress severity	A description of the highest heat stress as reported by the IO including the % of affected sheep, where reported by the IO
Vet presence	Yes/No per voyage
Loading issues reported	Yes/No per voyage (Comments were added in either ASEL non-compliance comment or in the comment box to include description as reported by the IO) e.g. loading inconsistent with approved load plan, sheep requiring rearrangement in the first days of the voyage
Temperatures (where recorded)	Maximum recorded dry bulb temperature Maximum recorded wet bulb temperature
Humidity	Where recorded
Births	Lambing/Calving/Pregnancy noted
Issues noted by IO with wool length compliance	Yes/No (description added to comments or ASEL non-compliance column)
Issues noted by IO with feed quality	Yes/No per voyage Any issues with quality of feed including feed turning into fines and sometimes reported as unpalatable to the sheep or mould in feed added to comments column
Water quality issues	Yes/No per voyage Any issues with water cleanliness and fouling of troughs added to comments column
Feed deprivation	Yes/No per voyage Issues noted with feed troughs not being filled, feed distribution issues – description added to comments column
Water deprivation	Yes/No per voyage Issues noted with water troughs not being filled, trough supply turned off and forgotten to be turned back on – description added to comments column
Ventilation issues	Yes/No per voyage Issues noted with hot spots, variation in ventilation or temperatures in some pens/decks reported as 'yes' and description added to comments column
Inanition/Shy Feeding	Yes/No per voyage Where sheep were reported by IOs as either dying from inanition/starvation or where shy feeders were reported to be hospitalised for treatment
Comments	A separate column was added for free text comments to be added from the IO report. This included short statements like "food broken into fines" or descriptions of "moist pads" and longer statements that helped interpret some of the above assessments.

Once key data points were collated, additional columns were added which included further analysis of the data against published scientific evidence. Data in this report that required further analysis were:

- Heat stress score – determined using the most severe heat stress indicator recorded in the IO report. Where the IO provided a score this was used directly, where a description was provided, the description was assessed using the scoring system recommended in the HSRA Technical Panel Final Report [6] to provide a definitive number. For example, where an IO described heat stress as “increased respiratory rate” (report 76) this was scored only as 1; closed mouth panting described as “The observer noted that from day 5 – 14 of the voyage, almost all sheep (95-100%) were panting with their mouths closed” (report 98) was interpreted as increased breathing effort and scored as 2. The duration of heat stress was rarely reported to this level of detail.

**Table 1 Panting score and character**

<b>Panting score</b>	<b>Description</b>	<b>Respiratory rate (breaths per minute)</b>
0	Normal resting /active respiratory rate	Up to 60
1	Increased respiratory rate	61 to 80
2	Further increased respiratory rate accompanied by increased breathing effort, the whole animal works harder to breathe and body movements are obvious	81 to 120
3	Mouth open panting	121 to 192
4	Mouth open and tongue protruding as they pant	Above 192

Source: Based on table 1.2 from Stockman (2006) p. 56

Table 2: Panting score and character (from HSRA Technical Panel Final report 2019 [6]taken from Stockman CA, 2006)[7]

- ASEL compliance – This was determined using the qualitative information provided by IO descriptions of events on board assessed against the relevant Australian Standards for the Export of Livestock (ASEL) at the time of the journey, noting that some ASEL requirements changed over the course of 2018-2023. Any activity described that was inconsistent with ASEL requirements across the journey was considered to indicate non-compliance to ASEL. On occasion the IO had made an assessment regarding ASEL compliance, however, this did not always match the reported activity on board the vessel. For example, report 200 stated “Many of the horned rams could not get their heads through the rails to access feed and water because of the deck configuration” and as per ASEL requirements at the time [ASEL2.3] S1.16 Horned sheep or rams must only be sourced for export as slaughter and feeder animals if the horns:
  - (a) are not turned in so as to cause damage to the head or eyes;
  - (b) would not endanger other animals during transport;
  - (c) would not restrict access to feed or water during transport; and**
  - (d) are one full curl or less, or are tipped back to one full curl or less.

Despite this finding the IO report stated: “The exporter arrangements were observed to be implemented during the voyage, and to be compliant with ASEL requirements.”

The reason for determining issues that were deemed inconsistent with the ASEL was recorded in a separate column.

## Quality Control

An experienced research scientist who is independent of the RSPCA was contracted by RSPCA Australia to cross check the accuracy of data entry, to compare the data entered into the list with that which was in the reports, and to confirm the interpretation of the analysis points. Minor changes were required in some records, however no major inconsistencies were identified. The contractor also cross-checked and entered the Heat Stress Score. If the IO reported a specific Panting score, this was transferred to the Heat Stress Score; if not, the comments from the IO were used to determine the Panting score from the HSRA Technical Panel Final Report.

## Data Assessment

The data was extracted from the SharePoint list and into an Excel document to allow for data summaries using pivot tables and formulas including the “COUNTIF” function to report on the most common reported causes of death and illness on board.

## Unavailable Data

There has been significant inconsistency in IO reporting quality from 2018 to 2023. A marked reduction in reporting of indicators of heat stress and air temperatures on board is noted in 2022 and 2023.

In many reports, no information on heat stress indicators was recorded and causes of death and illnesses were often not reported. Reports with missing information were still included in the analysis, therefore it is possible that the actual figures for heat stress and poor conditions on board were higher than those determined in this report.

In 2022-2023, DAFF established a new publishing format for IO reports that has since resulted in more heavily summarised IO reports than the previous format. Therefore, reports in this period have overly standardised the structure and inhibited the publication of sufficient detail about animal welfare outcomes and journey conditions. This has severely limited transparency of the conditions and events on board live export vessels. Note the RSPCA had already previously expressed concern about the ‘sanitisation’ and loss of important detail in the summaries prepared from the reports[8].

In addition to the poor reporting of detail in IO reports in the 2022-2023 period, IOs were not on board approximately 70% of live sheep export journeys from 2018-2023. According to DAFFs publicly available report “All-livestock-exports-2018-2023”[9], there were 172 live export journeys that carried sheep from April 2018 to May 2023; however, only 53 IO reports were available to analyse.

## Independent Observer Findings

On repeated occasions, IOs reported that events on the vessel did not indicate any systemic issues related to the exporter. However, such statements should not be taken to mean that no animal welfare issues occurred, because issues that may have impacted animal welfare do not necessarily correlate to systemic issues with the exporter. For example, heat stress scores of 3 may not be due to any systemic exporter management failure, but are nonetheless an important indicator of poor animal welfare. This highlights the inherent sheep welfare risks associated with live export journeys by sea.

In addition, some incidents of ASEL non-compliance were reported as unlikely to have impacted animal welfare. However, such incidents demonstrate misalignment and potential non-compliance with Australia’s live export standards and should be considered significant.

## Key Findings

RSPCA Australia analysed the data available from 53 journeys of live sheep export which included in total approximately 2.5 million sheep. On these journeys, a total of 6551 sheep deaths were recorded and a total of 1223 days on board recorded.

Key findings from the data analysis are as follows:

- Over 60% of IO reports (32 reports) listed indicators of heat stress from score 1-4, ranging from increased respiratory rates through to sheep with neck extended and open mouth panting.
- Over 30% of IO reports (17 reports) included a description that was interpreted to equate to a heat stress score of 3 or more (i.e. open mouth panting +/- tongue protruding).
- Inanition or shy feeding was reported in over 80% of the reports (or 43 reports) as a cause of death or illness on board.
- Activities inconsistent with the ASEL were reported in approximately 70% of journeys. These included:
  - Stocking densities at departure that were greater than the approved load plan and poor loading practices (e.g. reports 238, 57).
  - Poor selection of animals including those with pre-existing health issues or injuries (e.g. dog bite wounds, shearing wounds, horns too long making animals unable to reach feed/water) – see reports 31, 219, 213, 218, 200.
  - Poor sheep handling either on board or on unloading of the vessel (e.g report 32, 98, 9).
  - Wool length of greater than 25 mm (e.g. report 193, 238).
  - Poor management of ill animals on board (e.g. report 211 – unwell sheep hospitalised with otherwise well sheep infected with scabby mouth leading to feed competition, 99 – as reported by the IO “the sick animals would often die without being offered euthanasia”).
- Feed quality was reported as an issue in almost a third of all IO reports, most commonly due to a buildup of ‘fines’ (pelleted feed that crumbles into fine powder), which reportedly sheep are often reluctant to eat (e.g. report 99, 218, 225), and on one occasion mould in the feed was reported and reportedly not cleaned from feed troughs (report 07).
- 26% of IO reports (14 reports) indicated issues with ventilation. Reports included animals being housed in unapproved areas of the ship (report 238), hot spots near engine rooms (report 105, 71), and the smell of ammonia building up in some pens (report 50, 200).
- The most common cause of death reported was inanition or gastrointestinal disease. Other common causes of death reported were pneumonia, and injury or misadventure.
- The most common treatments provided on board were for shy feeding and gastrointestinal disease, lameness, injury/misadventure, pink eye and scabby mouth.

## Conclusions

The change in reporting and the publication of only limited information from IO reports has significantly reduced the public reporting of conditions on board live export vessels. This has resulted in a concerning lack of transparency of the live export industry, and arguably, at a most crucial time. The lack of Independent Observers on board a significant number of live sheep export journeys is also concerning as it has also led to a lack of transparency and reporting on conditions on board.

The RSPCA finds the reporting of conditions on board that directly affect animal welfare concerning. The fact that sheep suffered from hunger (reported most often as shy-feeding and inanition) on 80% of the journeys with IOs onboard, indicates this welfare issue is inherent to the trade. Other repeated issues on board included heat stress of varying degrees, loading practices that led to greater handling and movement of animals required in the first days of voyage, poor management of ill and injured animals, poor feed quality and poor selection of animals for loading.

Although Australian regulations have been updated over the years and some improvements have been achieved as the result of persistent advocacy, these animal welfare incidences have continued to occur. The most recent published independent observer report for live sheep export (#238 from May 2023), reported that sheep were without feed and water in aisles, and one sheep died from being left in an aisle in a moribund state, despite being identified to crew. 5% of sheep on board had wool length greater than the 25mm maximum allowed by ASEL, sheep were loaded inconsistent with the approved load plan requiring rearrangement in the first five days of the voyage, and areas of the ship were used to house animals that were unapproved for housing and had inadequate ventilation. The same report including reports of repeated inappropriate handling of the sheep on discharge, and despite someone taking the time to educate the handler to better practices, when not supervised they returned to their poor handling using a 'movement aid' on the face of the animal.

These incidences do not reflect a trade that has resolved animal welfare issues, and in fact, demonstrate the continued suffering and poor welfare outcomes for sheep. Furthermore, many of these issues appear to be not the fault or failings of any one exporter, but rather, endemic to the trade itself.

## Availability of Source Reports

All IO reports that were analysed to collect this data are publicly available and can be accessed either on the DAFF website or the government's archive website Trove.

- [Independent observer summary reports - DAFF \(agriculture.gov.au\)](https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/regulatory-framework/independent-observer-reports)
- [04 Jun 2022 - www.awe.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/regulatory-framework/independent-observations-livestock-export-sea - Trove \(nla.gov.au\)](https://www.awe.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/regulatory-framework/independent-observations-livestock-export-sea)

## References

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