



# Animal welfare in abattoirs, poultry processors and knackeries — regulatory scorecard



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# How to read this report

This report focuses on the mandatory animal welfare standards in abattoirs, poultry processors and knackeries (collectively referred to as slaughtering establishments) required by the Australian Government and each state and territory jurisdiction.

In this report, an *abattoir* defines a facility where animals are slaughtered for human consumption; a *poultry processor* is a specific type of abattoir where poultry are slaughtered for human consumption; and a *knackery* is a facility where animals are killed for animal food, or the making of animal by-products used in animal food. In some jurisdictions, a knackery may include establishments that receive live animals for slaughter and those that receive dead animals killed on-farm for further processing and the regulation for each of those types of establishments may differ.

The report makes repeated reference to five separate documents which form the basis of regulation in this area: the full title, link, and scope for each of these documents are set out below. These documents are referred to in this report by the abbreviations listed below. Where referred to collectively, standards *AS 4696:2007*, *AS 4465:2006* and *AS 4841:2006* are termed the *Australian Standards*.

This report does not cover the regulation of the slaughter of rabbits, ratites (emus and ostriches), crocodiles, fish or other marine life, or wild game. Wild game is defined as any mammal, bird or reptile, excluding fish, that is killed in the field (such as kangaroos, wild deer and boar). Nor does this report cover home slaughter services where animals are killed in situ and are not permitted to be sold in a commercial context.

<i>Model Code</i>	<u>Model Code of Practice for the Welfare of Animals: Livestock at Slaughtering Establishments</u> Standing Committee on Agriculture and Resource Management Report No. 79 (CSIRO Publishing, 2001 print, 2002 online)	Abattoirs Poultry processors Knackeries
<i>AS 4696:2007</i>	<u>Australian standard for the hygienic production and transportation of meat and meat products for human consumption</u> Food Regulation Standing Committee Technical Report No. 3, AS 4696:2007 (CSIRO Publishing, 2007)	Abattoirs
<i>Industry Animal Welfare Standards</i>	<u>Industry Animal Welfare Standards – Livestock processing establishments preparing meat for human consumption</u> Australian Meat Industry Council, Second edition (Meat & Livestock Australia, 2009)	Abattoirs
<i>AS 4465:2006</i>	<u>Australian standard for construction of premises and hygienic production of poultry meat for human consumption</u> Food Regulation Standing Committee Technical Report No. 1, AS 4465:2006 (CSIRO Publishing, 2006)	Poultry processors
<i>AS 4841:2006</i>	<u>Australian Standard for the Hygienic Production of Pet Meat</u> Primary Industries Standing Committee Technical Report No. 88 - Amended 2009, AS 4841:2006 (CSIRO Publishing, 2009)	Knackeries

# Executive summary

The aim of this report is to identify gaps in the regulatory system relating to animal welfare in abattoirs (domestic and export), poultry processors and knackeries across Australia and to provide recommendations for how these gaps could be addressed to improve animal welfare in the sector.

Publicly available information was sourced from all states and territories, with additional detailed information sourced through interviews with state and territory regulatory authorities. This information covered the regulatory requirement and structure, audit frequency and scope, auditor competency, company monitoring, training and reporting and enforcement actions and provisions available to the jurisdictions. In addition, information on three case studies where animal welfare incidents have occurred was gathered.

Export-registered abattoirs and poultry processors are regulated by the Australian Government Department of Agriculture, Water and the Environment (DAWE), in which the following is required: compliance with an 'Approved Arrangement' and standard operating procedures, weekly verification of animal handling practices, regular auditing, and the daily presence of an On-Plant Veterinarian (employed by the DAWE) at abattoirs and at poultry processors where it is an importing country requirement.

Abattoirs which supply export markets that require export registration and oversight by the DAWE are referred to as Tier 2 establishments. Some export markets accept product prepared in accordance with the relevant Australian Standard, with oversight of establishments by the relevant state regulatory authority; facilities that supply these markets are referred to as Tier 1 establishments.

Domestic abattoirs and knackeries are under the jurisdiction of state and territory governments. There is no requirement for an On-Plant Veterinarian and the standards for animal welfare and auditing requirements vary between jurisdictions. For example, in NSW, abattoirs are required to comply with the *Industry Animal Welfare Standards* as well as specific standard operating procedures, whereas in other jurisdictions standards are limited to the minimal provisions in *AS 4696:2007*. The *Model Code*, last updated in 2000, covers all slaughtering establishments, however, in most jurisdictions it is not mandatory and is in urgent need of replacing with contemporary standards.

There is little to no transparency around animal welfare standards or auditing of slaughtering establishments, especially in domestic abattoirs and knackeries. When issues are raised and investigations instigated, such as following the release of undercover footage of animal cruelty or poor practices, in most jurisdictions there is no public reporting of the outcomes of investigations. These problems exist at a time of increasing public concern about livestock production, transport and slaughter, and the regular publication of footage of poor practice at Australian abattoirs, poultry processors and knackeries.

In addition to this, the opportunity to improve existing standards via the national Animal Welfare Standards and Guidelines process has undergone delays since 2012 with the last activity recorded in 2017. In February 2020 the [Agriculture Ministers' Forum](#) (AGMIN) announced that the process will recommence and be led by the Queensland Government, however, at the time of writing (January 2021) no significant progress has yet been made in advancing this review.

The information presented in this report was analysed using a nominal scoring system to compare the level of regulation and enforcement for animal welfare in each jurisdiction. The results of this analysis show significant inconsistencies between jurisdictions in their regulatory requirements, compliance and enforcement actions across slaughtering establishments, and differences between facilities that serve domestic and export markets. These variations in approach appear to have occurred as a consequence of differences in past experiences and incidents, the regulatory environment and the resources available in each jurisdiction. In all cases there are gaps in the current regulatory system, however, some jurisdictions have more work to do than others to strengthen their regulation and enforcement practices.

To address the current inconsistencies, this report makes 13 recommendations in relation to animal welfare requirements, audit frequency, auditor training, oversight and CCTV use, company training, and transparency. Having a consistent regulatory framework to regulate and enforce animal welfare across Australia, will facilitate the continual improvement of animal welfare practices at abattoirs, poultry processors and knackeries.

# Summary of recommendations

**Recommendation 1** – The development of *Australian Animal Welfare Standards and Guidelines for Livestock at Processing Establishments* (applicable to cattle, sheep, goats, horses, pigs, deer, buffalo, camels, alpaca, donkeys and poultry) to replace the *Model Code* must be urgently prioritised.

**Recommendation 2** – The *Standards and Guidelines* must include species-specific standards where requirements differ for all points of processing from arrival until confirmation of death, including unloading, holding pen and race design, general handling, emergency killing, stunning and slaughter requirements. The *Standards and Guidelines* must include a requirement that they are independently reviewed and updated every five years to reflect scientific and technical developments.

**Recommendation 3** – Once endorsed, the *Standards and Guidelines* must be made a regulatory requirement for all abattoirs, poultry processors and knackeries through referencing in the relevant legislation in each jurisdiction.

**Recommendation 4** – Audits must be conducted at a minimum of quarterly at abattoirs, poultry processors and knackeries. Audit frequency must be based on a compliance rating with audit frequency increased if breaches or non-conformances are identified.

**Recommendation 5** – Where animal welfare is part of the scope of an audit, a minimum level of training in animal welfare, equivalent to Animal Welfare Officer training, must be required and held by auditors to cover all aspects of live animal handling at the slaughtering establishment.

**Recommendation 6** – Those officers who undertake investigations to enforce animal welfare legislation (through the implementation of the national *Animal Welfare Standards and Guidelines*) must be required to have both training in animal welfare, equivalent to Animal Welfare Officer training, as well as the *Certificate IV in Government Investigation* as is currently applied in the NT.

**Recommendation 7** – On-going state, territory and federal government funding must be dedicated towards training and capacity building for all staff, auditors and investigators to help ensure high animal welfare standards and that non-compliance with animal welfare standards at abattoirs, poultry processors and knackeries is identified and addressed.

**Recommendation 8** – To demonstrate ongoing animal welfare compliance, all slaughtering establishments must be required to conduct on-going verification of animal welfare through monitoring protocols (reflecting the relevant provisions of the current *Australian Standards*, and then the *Australian Animal Welfare Standards and Guidelines* when they are adopted) and licensing and/or registration requirements.

**Recommendation 9** – All slaughtering establishments must have an Animal Welfare Officer who is competent in all facets of production and who is responsible for the oversight of animal welfare at the facility and for reporting breaches of animal welfare to management to ensure appropriate actions are taken to address breaches.

**Recommendation 10** – Equipment for remote monitoring (e.g. CCTV) of procedures must be installed in livestock processing facilities and reviewed for internal plant operation. This equipment must allow a clear view of all areas where live animal handling occurs, including unloading facilities, lairage areas, restraint, stunning, shackling, and sticking processes.

**Recommendation 11** – A minimum level of training must be mandated as a licensing and/or registration requirement for all staff involved in activities that impact animal welfare at abattoirs, poultry processors and knackeries. Training must be certified by a registered training organisation.

**Recommendation 12** – Information on each regulatory authority's compliance and enforcement framework for animal welfare standards in abattoirs, poultry processors and knackeries must be made publicly available and be easily accessible. This must include details of what the minimum animal welfare standards and regulatory requirements are for: audit scope and frequency, auditor training, oversight (regulatory authority) training, company training and CCTV use.

**Recommendation 13** – Detailed reporting of the following information must be publicly available and updated annually:

- The number of export and domestic abattoirs, poultry processors and knackeries operating in each jurisdiction, as well as the species and number of animals slaughtered.
- The number of audits undertaken at each slaughtering establishment and the outcome of each of those audits, including details where critical non-compliances have occurred.
- The number of Animal Welfare Incident Reports or complaints submitted per slaughtering establishment, including details on the nature of the report or complaint as well as a descriptive outcome of the investigation findings and action taken.
- The type and number of slaughtering establishments operating under an Approved Arrangement that allows unstunned slaughter and the number of each species of animal subjected to unstunned slaughter.



# Introduction

RSPCA Australia is concerned about the differences in the way in which abattoirs, poultry processors and knackeries in Australia are regulated, and what this means in terms of the welfare of animals handled and slaughtered at these facilities.

Livestock industries in Australia produce and process meat products for both the domestic and export markets, with Australia being one of the largest exporters of beef, mutton and lamb globally. The majority of abattoirs are specialised for single-species processing, with only a few multi-species establishments remaining. Over the past 70 years the industry has undergone almost constant structural change, from historical centralised abattoirs owned by the public sector, to the decentralisation of abattoirs, and more recently, reducing to a smaller number of significantly larger abattoirs. Poultry processing plants differ from abattoirs in that they are predominantly part of a vertically integrated system, where the poultry company owns the entire process from breeding, hatching, growing, transport, and slaughter of birds. The scale of poultry processing has expanded exponentially in recent decades as poultry consumption has increased and, as with abattoirs, the trend is for fewer, larger facilities. Knackerries, which slaughter and process animals for animal food rather than human consumption, have been gradually reducing in number across Australia and remain as generally small-scale owner-operated facilities.

State and territory regulation of animal welfare at slaughtering establishments occurs through two main sets of legislation: food safety or meat production legislation and animal welfare legislation.

A version of this arrangement is in place across all states and territories. The regulation of slaughtering establishments in Australia is based on the type of animal being slaughtered, the purpose of slaughter, and the intended market of the resulting meat products. The [Australian Bureau of Statistics](#) releases public information for livestock slaughtered and meat produced for human consumption: the animals included in this data are cattle (bulls, bullocks and steers, and cows and heifers), calves (bobby and other), sheep, lambs, pigs, and poultry (meat chickens). Meat and Livestock Australia also provide numbers of cattle, sheep, goats and pigs slaughtered across each state (excluding Western Australia) through their [Weekly Slaughter Report](#). There is, however, no publicly available information for other animals slaughtered for human consumption, such as horses, ducks or turkeys or the number of animals slaughtered at knackeries.

The Australian meat industry markets itself, both domestically and internationally, as a source of clean, safe, high quality meat products. Intrinsically linked to this reputational messaging is the concept that animals are humanely handled prior to and during slaughter. However, inconsistencies in regulation, a lack of transparency across states and territories, and a series of publicly reported incidents have the potential to seriously erode public confidence in the treatment of animals at slaughtering establishments.

Industry has long recognised that public expectation for increasing levels of animal welfare standards to be upheld and demonstrated, as well as the need for increased transparency. The [Australian Meat Processor Corporation's Strategic Plan](#) for 2020-2025 states that, by 2025, red meat processors will have a transparent, industry-owned national animal welfare standard that exceeds all other standards globally. For this to occur, Australia requires a regulatory system that is consistent and can genuinely verify and enforce good animal welfare at all slaughtering establishments. This report identifies the gaps in the current system and what changes are needed to reach the point where Australians can have confidence that all animals entering an abattoir, poultry processor or knackery across the country are handled and slaughtered humanely.



# Methodology

A search of government and industry websites using key terms was conducted to determine how much information is currently publicly available on animal welfare and the regulatory arrangements for abattoirs, poultry processors and knackerries in Australia.

A general internet search using the same key terms was also conducted. This process also allowed the identification of the relevant regulatory authorities for each state and territory.

The regulation and enforcement of animal welfare was broken up into the principles required to ensure compliance, such as regulation, oversight, competency of staff at the regulator and company levels, and enforcement. Examples of non-conformances and prosecutions of animal welfare breaches were also provided using case studies. The case studies presented describe three incidents, at two abattoirs and a poultry processor, in two states which led to subsequent regulatory change.

Each regulatory authority was contacted to request a meeting on the regulation of animal welfare at slaughtering establishments in their state or territory. The aim of the meetings was to confirm that the information sourced through the search of publicly available documents was complete and accurate, and to obtain information on animal welfare and regulatory arrangements for slaughtering establishments where this information was unable to be sourced from publicly available documents.

Each state and territory regulatory authority was provided with the list of interview questions prior to the meeting to facilitate the discussion (Appendix 1). Contact was made with every state and territory except the Australian Capital Territory (ACT), as there are currently no slaughtering establishments in operation in the ACT. The ACT has therefore been omitted from this regulatory analysis. Interviews were held with government officers from NSW, NT, Queensland, SA, Victoria and WA.

Following the completion of a draft version of the report, each regulator was contacted and given the opportunity to review and provide written feedback on the draft report to ensure the accuracy of information presented and to fill any gaps where information had not yet been provided. Regulators were also provided an opportunity for video consultations with RSPCA Australia to further discuss any feedback on the draft report. In addition to the regulator consultations, the report was provided to the Australian Meat Industry Council and Australian Meat Processor Corporation prior to publication and a video consultation held to discuss any comments on the report.

The regulators consulted on the report were:

- Biosecurity Queensland – Queensland Department of Agriculture and Fisheries
- Biosecurity SA – Primary Industries and Regions South Australia
- Compliance and Enforcement Services – PrimeSafe Victoria
- Department of Agriculture, Water and the Environment – Australian Government
- Department of Industry, Tourism and Trade – Northern Territory Government
- Department of Primary Industries and Regional Development – Government of Western Australia
- Department of Primary Industries, Parks, Water and Environment – Tasmanian Government
- Food, Environmental Health Directorate, Public and Aboriginal Health Division – Government of Western Australia Department of Health
- Livestock Biosecurity Branch, Biosecurity & Animal Welfare Group – Department of Primary Industry and Resources – Northern Territory Government
- Regulatory Operations Unit - NSW Food Authority – NSW Department of Primary Industries
- Safe Food Production Queensland.

# Results

## Distribution of slaughtering establishments across Australia

Information on the number of abattoirs, poultry processors and knackeries in each Australian jurisdiction is not readily available to the public.

Some information is available on agency websites (e.g. the [NSW Food Authority](#) website mentions the total number of abattoirs in the state) or in annual reports (e.g. in Victoria the [PrimeSafe Annual Report](#) lists the number of each type of slaughtering establishment) but this is not consistent.

To compile this report, each regulator was approached to provide information on the number of export abattoirs, domestic abattoirs, poultry processors and knackeries in their state or territory. The distribution of each type of slaughtering establishment across Australia is shown in Table 1. The majority of export abattoirs are located in Queensland (24) and Victoria (24), the majority of poultry processors are located in NSW (30) and Victoria (20), and Queensland has the most domestic abattoirs (47). Mobile abattoirs are permitted in NSW, Victoria and WA, but not in the NT or Queensland.

## Food safety legislation

Slaughtering establishments are required to be licensed by their state or territory regulatory authority. Licensing is usually under the state or territory *Food Act*, or similar, and associated regulations, which are predominantly concerned with food safety. In addition, all food regulatory authorities require facilities processing animals for human consumption (abattoirs and poultry processors) to be compliant with the *Food Standards Code*<sup>1</sup>. The *Food Standards Code* standard 4.2.3 Primary Production and Processing Standard for Meat covers the following species: bovine (cattle), caprine (goats), ovine (sheep), porcine (pigs), bubaline (buffalo), camelidae (camels), cervidae (deer), crocodylidae (crocodiles), lagomorph (rabbits), ratite (emus), soliped (horses, donkeys).

In most jurisdictions, the food safety regulations reference additional standards which include aspects of animal welfare, including the *Australian Standards*. Most jurisdictions provide public links to these regulations and standards via their relevant government agency websites, however, animal welfare is not generally referenced. For example, the Biosecurity Tasmania webpage on [Meat and Poultry](#) provides a list of legislation and standards that regulate the Meat and Poultry Food Safety Scheme but there is no mention of animal welfare.

Table 2 shows the food safety or meat production legislation and regulations for each state or territory, the relevant *Australian Standards* that must be complied with under the regulations, and the governing body responsible for administration and enforcement.

The *Australian Standards* for each type of slaughtering establishment include requirements for humane handling, stunning and slaughter of animals, set out in detail in Table 3. The requirements are written as outcome-based requirements rather than being prescriptive, with guidelines provided to support compliance with the outcome.

<sup>1</sup> Food Standards Australia New Zealand, [Food Standards Code](#), 2019.

The *Australian Standards* all require the application of Hazard Analysis and Critical Control Point (HACCP) plans in the form of an 'Approved Arrangement' or 'Quality Assurance Arrangement', which are intended to manage the risks associated with slaughtering animals. These arrangements are defined as:

- *Approved Arrangement*: 'the arrangement for the business that is approved by the controlling authority' (AS 4696:2007; AS 4841:2006)
- *Quality Assurance Arrangement*: 'an arrangement between the controlling authority and the operator of a processing premises with an approved quality system, where company management takes responsibility for ensuring the production of wholesome poultry meat. The controlling authority's role is to monitor the effectiveness of a company's approved QA system through an audit program to ensure compliance with the relevant provisions of this Standard' (AS 4465:2006).

**Table 1:** Distribution of abattoirs, poultry processors and knackeries by state and territory<sup>a</sup>

	EXPORT ABATTOIRS	DOMESTIC ABATTOIRS	POULTRY PROCESSORS	KNACKERIES	ADDITIONAL INFORMATION
<b>NSW</b>	11	11	30	10 approximately	2 mobile abattoirs (1 poultry, 1 red meat)
<b>NT</b>	2	6	0	0	Mobile abattoirs not permitted under legislation
<b>QLD</b>	24 Includes 18 red meat, 5 poultry, 1 horse	47	8	1	Mobile abattoirs not permitted under legislation
<b>SA</b>	6 Includes 1 horse abattoir	2 Plus 28 small facilities (e.g. butchers)	7	1	
<b>TAS</b>	2	17	5	2	
<b>VIC</b>	24 1 holds permission for unstunned slaughter	16 Includes 4 Tier 1 abattoirs 1 holds permissions for unstunned slaughter	20 2 hold permission for unstunned slaughter	8 6 receive dead animals killed on-farm, 2 receive live animals	Mobile abattoirs are permitted under legislation
<b>WA</b>	11 Includes 2 Tier 1 abattoirs	7 Includes 1 'restricted' facility where product cannot be on-sold	7 1 is a small quail operation	3 1 knackery receives live animals and 2 pet meat processors where animals killed on-farm	4/7 domestic abattoirs are small operations associated with a prison, agricultural school or training facilities Mobile abattoirs are permitted under legislation

<sup>a</sup> Reflects information provided by state and territory regulators as of Sep-Oct2020

**Table 2:** Food safety or meat production legislation and the associated governing body by state or territory

	LEGISLATION	REGULATIONS AND RELEVANT AUSTRALIAN STANDARDS	GOVERNING BODY
NSW	<a href="#">Food Act 2003 (NSW)</a>	<a href="#">Food Regulation 2015</a> Part 9 requires compliance with AS 4696:2007, AS 4465:2006, AS 4841:2006	<a href="#">NSW Food Authority</a> (a statutory authority reporting to the Minister for Primary Industries)
NT	<a href="#">Meat Industries Act 1996</a>	<a href="#">Meat Industries Regulations 1997</a> Compliance with AS 4696:2007, AS 4465:2006 and AS 4841:2006 is a licensing requirement but the AS are not expressly mentioned in the Act or Regulations	<a href="#">Livestock Biosecurity Branch, Department of Primary Industry and Resources</a>
QLD	<a href="#">Food Production (Safety) Act 2000</a>	<a href="#">Food Production (Safety) Regulation 2014</a> Schedule 10 requires compliance with AS 4696:2007, AS 4465:2006 and AS 4841:2006 for food safety but does not require compliance with the animal welfare provisions of the standards	<a href="#">Safe Food Production Queensland</a> (a statutory authority reporting to the Minister for Agricultural Industry Development and Fisheries)
SA	<a href="#">Primary Produce (Food Safety Schemes) Act 2004</a>	<a href="#">Primary Produce (Food Safety Schemes) (Meat) Regulations 2017</a> Schedule 1 requires compliance with AS 4696:2007, AS 4465:2006, AS 4841:2006	<a href="#">Biosecurity SA, Primary Industries and Resources SA</a>
TAS	<a href="#">Primary Produce Safety Act 2011</a>	<a href="#">Primary Produce Safety (Meat and Poultry) Regulations 2014</a> Schedule 2 requires compliance with AS 4696:2007 AS 4465:2006 is considered as technical guidance but is not referenced <a href="#">Primary Produce Safety (Pet Food) Regulations 2014</a> Part 2 r.9 requires compliance with AS 4841:2006	<a href="#">Biosecurity Tasmania, Department of Primary Industries, Parks, Water and Environment</a>
VIC	<a href="#">Meat Industry Act 1993</a>	<a href="#">Meat Industry Regulations 2015</a> Requires compliance with AS 4696:2007 AS 4465:2006 and AS 4841:2006 are not referenced	<a href="#">PrimeSafe</a> (a statutory authority reporting to the Minister for Agriculture)
WA	<a href="#">Food Act 2008</a>	<a href="#">Food Regulations 2009</a> Part 5 Division 2 r.18 requires compliance with AS 4696:2007 and AS 4465:2006. The regulations cover pet meat production but do not require compliance with AS 4841:2006	<a href="#">Department of Health</a> (enforcement is conducted by local government)

**Table 3:** Summary of the animal welfare requirements under the Australian Standards for abattoirs, poultry processors and knackereries

	AS 4696:2007 - ABATTOIRS	AS 4465:2006 - POULTRY PROCESSORS	AS 4841:2006 - KNACKERIES
<b>Species covered</b>	Cattle, buffalo, camels, goats, deer, sheep, pigs, horses and donkeys	Poultry	Any animal approved (by the controlling authority) for the production of pet meat
<b>Animal welfare</b>	Outcome: the minimisation of the risk of injury, pain and suffering and the least practical disturbance to animals	Outcome for animal welfare is not specified Operation under <i>AS 4465:2006</i> requires compliance with the <i>Model Code</i> but only with respect to infrastructure and equipment	Outcome: Animal welfare is not jeopardised and animal handling facilities are not a source of contamination Operation under <i>AS 4841:2006</i> requires compliance with the relevant codes of practice for the welfare of animals
<b>Handling</b>	<p>Premises and equipment are used in a way and are maintained in a condition that minimises risk of injury, pain and suffering to animals and causes the least practicable disturbance</p> <p>Animals are handled in a way that minimises risk of injury, pain and suffering and causes the least practicable disturbance to them and other animals</p> <p>Separation of animals of different species or different sexes or of animals of the same species is provided to the extent necessary to minimize the risk of injury, pain, suffering to them and causes them the least practicable disturbance</p> <p>Animals are provided with feed (where appropriate), water, shade, shelter, space and ventilation that is sufficient to minimise stress to the animals</p> <p>If it is necessary to minimise the stress to animals, water sprays are provided</p> <p>Special provisions for handling/slaughter of unweaned or stressed, injured, diseased animals and animals of a species that is particularly susceptible to stress</p> <p>Injured and sick animals are examined and given appropriate treatment and are segregated from other animals</p> <p>Animals requiring emergency slaughter are not moved more than necessary and slaughtered or killed as soon as possible after being identified</p>	<p>An efficient and humane method of restraint should be provided to prevent escape of poultry during shackling</p> <p>Moribund, unhealthy or rejected poultry shall be humanely killed immediately</p> <p>System in place to ensure live poultry are treated humanely</p>	<p>Premises and equipment are used in a way and are maintained in a condition that minimises risk of injury, pain and suffering to animals and causes them the least practicable disturbance</p> <p>Animals are handled in a way that minimises risk of injury, pain and suffering and causes least disturbance to them and other animals</p> <p>Separation of animals of different species or different sexes or of animals of the same species is provided to the extent necessary to minimise the risk of injury, pain, suffering to them and causes them the least practicable disturbance</p> <p>Animals are provided with feed (where appropriate), water, shade, shelter, space and ventilation sufficient to minimise stress on the animals</p> <p>Animals requiring emergency slaughter are not moved more than necessary and slaughtered or killed as soon as possible after being identified</p>

	AS 4696:2007 - ABATTOIRS	AS 4465:2006 - POULTRY PROCESSORS	AS 4841:2006 - KNACKERIES
<b>Stunning</b>	<p>Before sticking commences, animals are stunned to ensure they are unconscious and insensible to pain before sticking occurs and do not regain consciousness or sensibility before dying</p> <p>Before stunning commences, animals are restrained in a way that ensures stunning is effective</p> <p>Ritual slaughter: an animal that is stuck without first being stunned and is not rendered unconscious as part of its ritual slaughter is stunned without delay after it is stuck to ensure it is rendered unconscious</p>	<p>Where continuous mechanised slaughtering takes place, stunning equipment shall be provided in accordance with the <i>Model Code</i></p> <p>Poultry for processing shall be:</p> <p>a) rendered unconscious by: an electric current, approved inert gas, or dislocation of the head, and must not regain consciousness before slaughter, or</p> <p>b) rendered unconscious or slaughtered by a method that has been approved in writing by the controlling authority</p>	<p>Before sticking commences, animals are stunned to ensure they are unconscious and insensible to pain before sticking occurs and do not regain consciousness or sensibility before dying</p> <p>Before stunning commences, animals are restrained in a way that ensures stunning is effective</p>
<b>Slaughter</b>	<p>Outcome: Slaughter and dressing is to be done in a way that: a) reduces the risk of contamination of carcasses and carcase parts to a level that ensure the wholesomeness of meat and meat products is not jeopardized; and b) ensures an accurate post-mortem disposition can be applied to carcasses and carcase parts.</p> <p>Animals are slaughtered in a way that prevents unnecessary injury, pain and suffering to them and causes them the least practicable disturbance</p> <p>A meat safety inspector is present during slaughter</p> <p>Animals are unconscious and primary bleeding is completed before dressing commences</p>	<p>All poultry shall be humanely killed</p> <p>Poultry shall be suspended for bleeding or placed in bleeding cones after stunning</p> <p>Where bleeding is carried out with automatic equipment the method shall be humane in operation and a backup bleeder shall be provided</p>	<p>Outcome: Consistent, routine slaughtering and dressing procedures that minimise or eliminate the risk of physical contamination and contamination of carcase meat by pathogenic micro-organisms</p> <p>All live animals presented for processing shall be: handled in a humane manner and adequately rested; held in secure and clean lairages with an adequate supply of drinking water before slaughter; subject to inspection; slaughtered within 24 hours of passing ante-mortem inspection or, if not slaughtered within that period, re-inspected or condemned; adequately identified up to post-mortem inspection</p>

	AS 4696:2007 - ABATTOIRS	AS 4465:2006 - POULTRY PROCESSORS	AS 4841:2006 - KNACKERIES
<b>Ante-mortem inspection</b>	<p>Animals are not slaughtered unless a meat safety inspector has carried out an ante-mortem inspection (within 24 hours before they are slaughtered) and has passed the animals for slaughter</p> <p>Meat safety inspector is looking for disease or other abnormality and will apply one of the following disposition to the animal:</p> <ul style="list-style-type: none"> <li>a) passed for unconditional slaughter</li> <li>b) passed for slaughter subject to conditions specified by the meat safety inspector</li> <li>c) withheld from slaughter</li> <li>d) condemned</li> </ul>	<p>Animals and carcasses shall be inspected by company employees who are suitably trained or who hold recognised qualifications relevant to such inspection</p> <p>Inspectors looking for moribund or unhealthy birds</p>	<p>Suitably trained person inspects animal at the knackery</p> <p>One of the following dispositions shall be applied to each animal after ante-mortem inspection:</p> <ul style="list-style-type: none"> <li>a) passed as fit for routine processing</li> <li>b) withheld from processing pending treatment for or recovery from an abnormal condition (these animals must be resubmitted for another ante-mortem inspection before processing)</li> <li>c) subjected to immediate emergency slaughter to prevent deterioration of an abnormal condition, provided the condition would allow all or part to be processed for pet meat</li> <li>d) rejected as unfit for processing, destroyed by humane means and then disposed of in an approved manner</li> </ul>

These Approved Arrangements or Quality Assurance Arrangements require the establishment's management to commit to meeting the relevant *Australian Standards* and describe the risks of animal slaughter and how these risks will be controlled, monitored and documented. This normally occurs through the development of standard operating procedures and work instructions, training and competency of staff, the development of corrective and preventative action to manage variation from the critical limits, and regularly monitoring and review of their processing system. Guidance was provided to slaughtering establishments when HACCP was first introduced into Australia in the 1990s through *A Guide to the Implementation and Auditing of HACCP*<sup>2</sup>.

### Variations to Approved Arrangements

A significant variation to Approved Arrangements occurs where slaughtering establishments are permitted to carry out unstunned ritual slaughter (i.e. slaughter without prior stunning for religious purposes). Ritual slaughter is defined as where animals are slaughtered in accordance with Islamic rites to produce halal meat (under Islam), or in accordance with Judaic rites to produce kosher meat (under Judaism).

<sup>2</sup> SCARM, *A guide to the implementation and auditing of HACCP*, SCARM Report 60 (Victoria: CSIRO Publishing, 1997)



Exemptions to requirements for stunning for the purpose of ritual slaughter are permitted under clause 7.12 of AS 4696:2007 and are granted via a variation to the Approved Arrangement by the relevant state or territory authority. The *Model Code* (clauses 2.6.1.6 and 3.5.14) encourages the use of effective stunning prior to neck cutting for all animals (including poultry) even in the case of ritual slaughter, but where a variation in Approved Arrangements is granted, pre-cut stunning is not required.

All slaughtering establishments that undertake ritual slaughter of cattle, sheep or goats are required to comply with Meat Standards Committee Guideline MSC 01/2004 *Ritual slaughter for ovine and bovine* which sets out specific provisions that must be included in the Approved Arrangement:

- For cattle, they must be restrained in an upright position with additional head restraint during the throat cut. Immediately after the throat cut, stunning must be applied with a captive bolt pistol. This requires the presence of two slaughtermen, one to cut and one to stun. If the animal becomes distressed during the ritual slaughter process it must be immediately stunned.
- For sheep and goats, both carotid arteries and jugular veins must be severed during ritual slaughter; this must be confirmed prior to shackling. Animals must be unconscious before further procedures are carried out. Sheep and goats are considered to be rendered unconscious as a result of the throat cut and are therefore exempt from the requirement for post-cut stunning unless there is doubt as to the effectiveness of throat cut.

For poultry, under AS 4465:2006 there is no requirement for post-cut stunning for ritual slaughter.

Information on the number of slaughtering establishments granted variations to Approved Arrangements for unstunned ritual slaughter is not publicly available. However, as of October 2020, according to information compiled there were 9 abattoirs and poultry processors with approval to conduct slaughter without prior stunning in three different states: 2 in NSW, 3 in SA and 4 in Victoria. It should be noted that all export and the vast majority of domestic slaughtering establishments conducting halal slaughter in Australia do not require a variation to their Approved Arrangements as they comply with standard practice where animals are stunned prior to slaughter, on the condition that reversible stunning methods are used.

## Animal welfare legislation

In addition to food safety requirements, slaughtering establishments are required to comply with their state or territory animal welfare legislation. These instruments may also call up or refer to standards and guidelines or codes of practice, in particular, the *Model Code*. The animal welfare legislation for each state or territory, relevant regulations, and the government department responsible for its administration and enforcement are shown in Table 4. It should be noted that the Australian Government has no role in administering or enforcing state and territory animal welfare legislation and there is no equivalent legislation at the national level.

**Table 4:** Animal welfare or cruelty legislation and the associated administration/enforcement body (with respect to slaughtering establishments) by state and territory

	ANIMAL WELFARE ACT	ANIMAL WELFARE REGULATION	ADMINISTRATION AND ENFORCEMENT
NSW	<u>Prevention of Cruelty to Animals Act 1979</u>	<u>Prevention of Cruelty to Animals Regulation 2012</u> The <i>Model Code</i> is not referenced	<i>Administration:</i> Department of Primary Industries <i>Enforcement:</i> RSPCA NSW, Animal Welfare League NSW, NSW Police
NT	<u>Animal Welfare Act 1999</u>	<u>Animal Welfare Regulations 2000</u> The <i>Model Code</i> is not referenced	<i>Administration:</i> Biosecurity and Animal Welfare Branch, Department of Primary Industries and Resources (DPIR) <i>Enforcement:</i> DPIR, NT Police
QLD	<u>Animal Care and Protection Act 2001</u>	<u>Animal Care and Protection Regulation 2012</u> Schedule 4 adopts the <i>Model Code</i> as a voluntary code which if complied with, provides an exemption from cruelty provisions in the Act	<i>Administration:</i> Biosecurity Queensland, Department of Agriculture and Fisheries <i>Enforcement:</i> Biosecurity Queensland, Queensland Police MOU with Safe Food Queensland to report all animal health and welfare related breaches to Biosecurity Queensland
SA	<u>Animal Welfare Act 1985</u>	<u>Animal Welfare Regulations 2012</u> Schedule 2 adopts the <i>Model Code</i> as a compulsory code	<i>Administration:</i> Department of Environment and Water <i>Enforcement:</i> RSPCA SA
TAS	<u>Animal Welfare Act 1993</u>	<u>Animal Welfare (General) Regulations 2013</u> The <i>Model Code</i> is not referenced	<i>Administration:</i> Biosecurity Tasmania Animal Biosecurity and Welfare branch (ABWA), Department of Primary Industries, Parks, Water and Environment <i>Enforcement:</i> Biosecurity Tasmania ABWA
VIC	<u>Prevention of Cruelty to Animals Act 1986</u> S.6(1)(a) This Act does not apply to the slaughter of animals in accordance with the Meat Industry Act 1993 or any Commonwealth Act	<u>Prevention of Cruelty to Animals Regulations 2019</u> The <i>Model Code</i> is not referenced	<i>Administration:</i> Agriculture Victoria <i>Enforcement:</i> Agriculture Victoria, Vic Police
WA	<u>Animal Welfare Act 2002</u>	<u>Animal Welfare (General) Regulations 2003</u> The <i>Model Code</i> is adopted as a defence, which provides an exemption from cruelty provision in the Act is complied with	<i>Administration:</i> Department of Primary Industries and Regional Development (DPIRD) <i>Enforcement:</i> DPIRD Livestock Compliance Unit, WA Police

The *Model Code* covers humane handling, stunning and slaughtering of animals at abattoirs, poultry processors and knackerries. Its status varies across jurisdictions. In SA it is a compulsory code, in Queensland it is voluntary, in WA it can be used as a defence against prosecution, and in NSW, NT, Victoria and Tasmania it is not referenced in animal welfare legislation at all. Its status as a compulsory code in any jurisdiction is tempered by the way the code is worded: the majority of clauses are in the form of 'should' statements, rather than a mandatory 'must'. There is also no requirement in the *Australian Standards* to comply with the animal welfare requirements in the *Model Code*. For poultry processors, AS 4465:2005 requires compliance with the *Model Code* but only with respect to infrastructure and equipment.

The *Model Code* provides a greater level of detail in relation to animal welfare than the *Australian Standards*, including some details which apply to certain species, i.e. cattle, deer, horses, pigs, poultry, sheep and goats, but it does not contain detailed standards specific to one group or species of animal other than for poultry (see Table 5). Gaps in standards are particularly apparent for horses, deer and calves and in relation to handling for all species.

In 2012, a draft *Australian Animal Welfare Standards and Guidelines* for Livestock at Processing Establishments was developed by industry, regulators and animal welfare groups to account for advancements in understanding and technology since the development of the *Model Code*. The draft document was informed by the *Model Code* and the *Industry Animal Welfare Standards* and intended to replace the *Model Code*. The process is managed by the Animal Welfare Task Group (AWTG), a national committee which ultimately reports to state and territory agriculture ministers. Since 2012, the development process of these standards and guidelines has undergone numerous delays, with the last activity recorded in 2017. In February 2020, the Agriculture Ministers' Forum (AGMIN) announced that the process will recommence and be led by the Queensland Government, however, at the time of writing (January 2021) no significant progress has yet been made in advancing this review.

**Table 5:** Species-specific animal welfare considerations in the *Model Code* (summary)

	CALVES	CATTLE	DEER	HORSES	PIGS	POULTRY	SHEEP/ GOATS
Unloading ramps	✗	✓	✗	✗	✓	NA	✓
Unloading	✓	✓	✓	✓	✓	✓	✓
Holding facilities	✓	✓	✓	✗	✓	✓	✓
Holding time	✓	✓	✗	✗	✓	✓	✓
Races	✓	✓	✗	✗	✓	NA	✗
Handling	✗	✗	✗	✗	✗	✗	✗
Stunning restraint	✗	✓	✓	✓	✓	✓	✓
Stunning technique	✓	✓	✓	✓	✓	✓	✓
Bleeding out	✓	✗	✗	✗	✓	✓	✓
Emergency killing	✗	✓	✓	✓	✓	✗	✓

## Jurisdictional variations

A number of notable variations to the general requirements described above occur at the state or territory level.

### New South Wales

- Abattoirs are required under licensing conditions to comply with Section 2 of the *Industry Animal Welfare Standards* (see p18) which includes staff competency requirements, management and humane killing of weak, ill or injured livestock, management of livestock to minimise stress and injuries, and humane slaughter procedures. The trigger for this development was the closure of the Hawkesbury Valley abattoir in 2012 due to animal welfare breaches described in Case study 1.
- Poultry processors are required under licensing conditions to have an animal welfare system in place. This system is to be included in the requirements of the Quality Assurance Program under Chapter 14 of *AS 4465:2006*. The program is required to cover management procedures and planning; design and maintenance of facilities and equipment; staff competency; management and humane killing of weak, ill or injured livestock; management of animals to minimise stress and injuries; and humane slaughter procedures.
- RSPCA NSW is empowered to enforce compliance with the *Prevention of Cruelty to Animals Act 1979* and *Prevention of Cruelty to Animals Regulations 2012* including conducting relevant investigations on behalf of the NSW government.

### Queensland

- Licensing conditions with Safe Food Production Queensland require an animal welfare program that meets the requirements of the *Industry Animal Welfare Standards* for abattoirs, or the poultry industry's *National Animal Welfare Standards for the Chicken Meat Industry* for poultry processors.

### South Australia

- RSPCA SA is empowered to enforce compliance with the *Animal Welfare Act 1985* including conducting relevant investigations on behalf of the state government.

### Western Australia

- Enforcement of the *Food Regulations 2009* is conducted by local government rather than at a state government level by the Department of Health.
- Knackeries are considered to be 'offensive trades' and must be licenced by the relevant local government authority. They are regulated under the *Health (Miscellaneous Provisions) Act 1911*; *Health (Offensive Trades) Regulations* and *Food Regulations 2009 (Div 4 – Pet Meat)*. Although, knackeries and pet meat processing establishments are referenced in the *Food Regulations 2009*, inspection requirements only apply to abattoirs (as producers of meat for human consumption).

### CASE STUDY 1

## HAWKESBURY VALLEY MEAT PROCESSORS, WILBERFORCE, NEW SOUTH WALES — 2012

Footage was secretly taken inside the Hawkesbury Valley abattoir, shot over a six-day period in 2012. This footage showed workers mistreating sheep, cattle, pigs and goats including:

- A live pig being hit over the head repeatedly with a metal bar
- Repeated use of electric prodders when moving animals
- A goat thrown into the wall
- Bleeding of a pig that had not been properly stunned
- Inadequately stunned goat subjected to slaughter procedures

In the year prior to the incident (2011), the abattoir had been visited four times by the regulator, but no licence breaches or problems of the nature observed in the footage had been identified. RSPCA NSW indicated they had had previous complaints about the abattoir, but none that warranted prosecution.

The NSW Food Authority shut down operations at the abattoir after viewing the footage. The abattoir was reopened under strict conditions one month later following a review of the abattoir's processes in relation to their licence. These strict conditions included:

- the abattoir amending their food safety program to include:
  - stringent procedures for stunning and slaughtering including training requirements and
  - procedures to move animals up the race more smoothly and with less stress
- the training of staff in nationally approved animal welfare training
- the installation of CCTV cameras to monitor animal treatment. The company were required to regularly monitor the footage and provide access to the footage during audit.
- the employment of two specialist consultants, including a former Australian Quarantine and Inspection Service senior vet
- the modification of the cattle race
- increased audits and inspections by the NSW Food Authority and RSPCA NSW to ensure compliance.

Following the completion of the investigation conducted by the NSW government, Hawkesbury Valley Meat Processors was fined \$5200 for licence condition breaches and was placed on the NSW government's name and shame register.

Following this incident, the NSW government conducted a review of domestic abattoir operations. The review identified that staff competency and skills in animal welfare varied and confirmed the need for minimum training requirements in specific competencies for operational staff. The animal welfare package announced following the review required:

- All domestic abattoirs to have a trained animal welfare officer onsite during processing
- The training of all relevant employees in 'stunning, sticking and shackling'
- Compliance with mandatory adoption of section 2 of *Industry Animal Welfare Standards* by all domestic abattoirs in NSW
- An additional annual audit focusing on animal welfare.

A criminal investigation into the alleged animal mistreatment was conducted by RSPCA NSW. The processor pleaded guilty to five counts of animal cruelty and in May 2013 was ordered to pay a \$60,000 fine.

### Related Articles

[Jen Rosenberg, Covert evidence of cruelty halts abattoir, Hawkesbury Gazette, 9 February 2012](#)

[Josephine Tovey, Cruelty video: 'rogue' abattoir checked four times in a year, The Sydney Morning Herald, 10 February 2012](#)

[Steve Cannane, Abattoir shut down over cruelty concerns, ABC News, 10 February 2012](#)

[Beef Central, Sydney abattoir re-opens under strict conditions, Beef Central, 9 March 2012](#)

[Tony Bosworth, Wilberforce abattoir's strict rules, Hawkesbury Gazette, 15 March 2012](#)

[Chris Harris, Mandatory welfare training for abattoirs, The Poultry Site, 18 May 2012](#)

[AAP, NSW Abattoir's cruelty sickening: court. News.com.au, 13 May 2013](#)

## Export legislation

Where abattoirs and poultry processors export product to overseas markets, they must also comply with federal legislation that is regulated by the Australian Government Department of Agriculture, Water and the Environment (the DAWE). Companies are required to be registered under the *Export Control Act 1982* and its subordinate regulations, *Export Control (Orders) Regulations 1982*, and the:

- *Export Control (Meat and Meat Products) Orders 2005*
- *Export Control (Poultry Meat and Poultry Meat Products) Orders 2010*.

The *Export Control (Meat and Meat Products) Orders 2005*, similar to the state and territory food safety or meat production legislation, have the objectives:

*‘to ensure that meat and meat products intended for export for food:*

- (a) are wholesome or are identified for export for further processing for food; and*
- (b) meet requirements to have an accurate trade description; and*
- (c) meet the importing country requirements necessary to maintain market eligibility; and*
- (d) are traceable, can be recalled if required and their integrity is assured.’*

Animal welfare is not an objective of the export legislation. However, the *Export Control (Meat and Meat Products) Orders 2005* do require compliance with *AS 4696:2007*, which includes some general animal welfare provisions (see Table 3).

Similar to the state or territory requirements for domestic establishments, the DAWE requires an Approved Arrangement for exporting establishments, which includes a requirement for an On-Plant Veterinarian (who is an employee of the DAWE) at abattoirs and at poultry processors where it is an importing country requirement. the DAWE provides guidance on the inclusions required in this arrangement<sup>3</sup> and the framework that it is audited against<sup>4</sup>. In terms of animal welfare, these inclusions require procedures to be in place to ‘ensure the humane and considerate treatment of livestock’. On-Plant Veterinarians verify animal welfare compliance against the Approved Arrangement during daily ante-mortem inspections and monthly verification of animal handling practices and slaughter procedures. During these verifications, if a non-compliance is observed a Corrective Action Request may be issued, directing abattoir management to immediately alleviate an animal’s pain and suffering and address the factors that led to the non-compliance. As animal welfare is under the jurisdiction of state and territory authorities, the DAWE staff who carry out verification tasks and compliance audits at export establishments are also required to report any major breaches in animal welfare through submitting an Animal Welfare Incident Report to the appropriate state or territory authority<sup>5</sup>.

In November 2018, the DAWE formally recognised the Australian livestock processing industry’s *Australian Livestock Processing Industry Animal Welfare Certification System* (AAWCS – see p21) and the role of AUS-MEAT (Australia’s main agricultural auditing, certification and training provider) in auditing AAWCS-certified export registered establishments<sup>6</sup>. The AAWCS is a voluntary program, jointly owned by the Australian Meat Industry Council (AMIC) and the Australian Meat Processor Corporation (AMPC), that allows establishments to demonstrate compliance with the *Industry Animal Welfare Standards* and covers animal welfare requirements from the time animals (cattle and calves, sheep and lambs, pigs, deer, goats, buffalo and horses) arrive at the establishment to the point of slaughter, including:

- standard operating procedures to prevent risks to animal welfare
- design and maintenance of facilities and equipment to ensure minimal interference or stress to livestock
- all staff required to handle livestock are competent
- livestock that are weak, ill or injured are identified and promptly treated
- livestock are managed to minimise stress and injuries
- restraint, stunning and slaughter procedures are carried out humanely and effectively.

3 Australian Government DAWE, [Approved arrangement guidelines – Meat](#), January 2019.

4 Australian Government DAWE, [Export meat systems audit program checklist](#), February 2015.

5 Australian Government DAWE, Meat Notice 2016-07 - [Managing animal welfare concerns at export registered red meat and pork slaughtering establishments](#), 29 November 2016.

6 Australian Government DAWE, [Australian Livestock Processing Industry Animal Welfare Certification System \(AAWCS\) Conditions of Recognition](#), November 2018.

Importing countries may have further requirements that must be met in addition to the Australian requirements. For example, establishments exporting product to the European Union must meet additional animal welfare requirements (*EU Council regulation (EC) No 1099/2009 on the protection of animals at the time of killing*) including:

- the presence of an Animal Welfare Officer at the establishment
- certificate of competency for staff responsible for handling, stunning and sticking animals
- animals are not restrained until the person responsible for stunning and bleeding is ready to stun and bleed the animal as quickly as possible
- priority must be given to unweaned, lactating dairy animals and animals that have given birth during transport
- electrical and gas stunning equipment must display stunning parameters
- pigs and sheep must be able to walk side by side in lairage facilities
- cattle restraining box must restrict lateral and vertical movement of the animal's head
- animals in pens must have access to water at all times.

## Export abattoirs

Export abattoirs can be classified as Tier 1 or Tier 2 establishments. Both Tier 1 and Tier 2 establishments are registered under the *Export Control Act 1982* and its subordinate regulations that require operation under an Approved Arrangement or Quality Assurance Arrangement. Tier 1 establishments are approved to produce and supply to a limited number of importing countries that accept AS 4696:2007 requirements and state or territory regulatory oversight. A Tier 1 establishment must have an Approved Arrangement as required by AS 4696:2007, which requires descriptions of procedures to ensure product integrity/traceability, compliance with halal requirements (if applicable), and procedures for complying with export certification. Despite being registered with the DAWE, the establishment is regulated by their relevant state or territory regulatory authority (see Table 2). Species slaughtered in Tier 1 exporting establishments operating under a state or territory regulatory authority may include cattle, buffalo, camel, sheep, goat, horse, pig, or deer.

Tier 2 establishments are export registered with oversight conducted by the DAWE. These establishments can potentially access all export markets conditional of meeting specific importing country requirements (specific approval is required for some markets). An abattoir cannot be registered as a Tier 1 and Tier 2 establishment simultaneously.

## Poultry processors

For poultry, the *Export Control (Poultry Meat and Poultry Meat Products) Orders 2010*, require poultry processors to meet the objectives:

*‘to ensure that poultry meat and poultry meat products exported, or for export, for food:*

- are wholesome or are identified as requiring further processing to be fit for human consumption; and*
- meet relevant importing country requirements; and*
- are traceable and can be recalled if required; and*
- are derived from animals that were treated humanely during slaughter; and that the integrity of poultry meat and poultry meat products exported, or for export, for food is assured; and*
- that the trade descriptions for poultry meat and poultry meat products exported, or for export, for food are accurate.’*

The *Orders* require compliance with AS 4465:2006, which in turn requires compliance with the infrastructure and equipment requirements of the *Model Code* (but not the animal welfare requirements). As with export abattoirs, the DAWE requires an Approved Arrangement and provides guidance on the inclusions required in this document<sup>7</sup>. In terms of animal welfare, these inclusions require procedures to be in place to ‘ensure the humane treatment of the poultry’ and for animal welfare requirements not to be compromised.

<sup>7</sup> Australian Government DAWE, Approved arrangement guidelines – Poultry, May 2018.



## Knackeries

Pet food is classified as a non-prescribed good under the export legislation, which means pet food is not regulated by Australian export laws<sup>8</sup>. As such, the export requirements for knackeries are solely based on the importing country's requirements.

## Industry animal welfare standards

In addition to meeting minimum regulated standards for animal welfare, abattoirs must meet customer requirements. For abattoirs, the majority of these customer requirements are covered by the voluntary AAWCS (see p19). The AAWSC allows abattoirs to use the Scheme's trademark by agreeing to comply with the Scheme's standard – the *Industry Animal Welfare Standards*. Compliance with these standards (which do not cover poultry) is verified by AUS-MEAT Limited through annual audits. All AUS-MEAT auditors are registered with Exemplar Global, a training certification provider, and hold certifications relevant to auditing live animals at slaughter.

The *Industry Animal Welfare Standards* were developed in 2005 by a multi stakeholder steering committee with members from industry, science, policy, animal welfare and other supply chain representatives. They were developed to be incorporated into existing processing quality assurance programs to assist in demonstrating compliance with existing regulatory requirements in the industry. They include a combination of minimum requirements and best practice international and customer requirements. Compliance is achieved via the incorporation of the principles in the establishment's Approved Arrangement systems.

The last review of the *Industry Animal Welfare Standards* was conducted in 2009. In July 2020, AMIC with the support of AMPC, commenced a review of these standards and an AMIC Industry Animal Welfare Standard Committee was developed to assist with the process.

In addition to the *Industry Animal Welfare Standards*, customers may demand further requirements which abattoirs must comply with in order to supply that customer. For example, McDonald's require abattoirs to meet standards which exceed the AAWCS, including specific measures for animal stunning performance and requirements for CCTV monitoring. As well as compliance with AAWCS, Woolworths Limited require additional animal welfare requirements including CCTV monitoring at critical points. Similarly, Coles require compliance with proprietary animal welfare standards and require CCTV monitoring for all cattle, pig and sheep slaughtering establishments.

## Best practice regulation

In March 2017, the Australian Productivity Commission released a report<sup>9</sup> on the regulation of Australian agriculture following an extensive year-long inquiry. The report included a comprehensive assessment of animal welfare laws and governance in Australia. It identified a number of significant failings in the way Australia currently develops national animal welfare standards. These include:

- a lack of independence and transparency in the standards development process
- a failure to properly consider community values and expectations
- a lack of scientific basis for the standards
- the presence of conflicts of interest on behalf of state, territory and federal Departments of Agriculture in managing animal welfare responsibilities.

Although this inquiry related to regulations affecting farm businesses, the findings provide valuable direction for the further development of the *Animal Welfare Standards and Guidelines for Livestock at Processing Establishments*.

<sup>8</sup> Australian Government DAWE, [Exporting non-prescribed good from Australia](#), November 2019.

<sup>9</sup> Regulation of Australian Agriculture. [Productivity Commission Inquiry Report](#), 2016.

For regulation to be truly effective, it must be nationally consistent and comprise of animal welfare standards that are clear, specific, and measurable.

The importance of animal welfare is recognised globally. The lack of national leadership on animal welfare influenced Australia's low ranking (a 'D') in the 2020 [World Animal Protection Index](#), where legislation and policies of 50 countries were compared. Australia was found to have no national legislation applying to animal welfare or to protecting animals used in farming<sup>10</sup>.

In 2014, the Food and Agriculture Organization of the United Nations published a review<sup>11</sup> of animal welfare legislation in the beef cattle, pig and poultry industries in the EU and several other countries. The review found that EU legislation as relevant on farm, during transport and at slaughter was, overall, the most comprehensive in the world.

In 2011, the Food and Veterinary Office of the European Commission, conducted an assessment of animal welfare at slaughter in non-EU countries which export meat to the EU<sup>12</sup>. These fact-finding missions were carried out in preparation for the introduction of new European Commission animal welfare legislation for abattoirs and poultry processors. The Food and Veterinary Office visited nine countries including Australia. The report states that the model for best practice is where industry standards are adopted and these standards are underpinned by criteria which, in turn, are monitored using checklists which in turn, allow the level of compliance with standards to be quantified and performance to be measured.

## Regulatory oversight

Regulatory oversight is designed to ensure compliance with the regulations. This oversight can come in many forms:

- physically on-site through full inspection or surveillance inspection, verification of activities and/or auditing off-site via remote actions through data or video surveillance and/or reporting
- directly through regulator staff presence
- indirectly through authorisation of third party or company staff.

### Auditing - animal welfare audit frequency

Government departments (see Table 2) verify the animal welfare requirements at abattoirs, poultry processors and knackereries through audits. Audits allow assessment of previous compliance through examination of Approved Arrangement or Quality Assurance Arrangement records, physical inspection and questioning of staff to the audit scope. The goal of an audit is to assess the ability of the establishment's Approved Arrangement or Quality Assurance Arrangement to provide ongoing compliance with the requirements of these arrangements. Table 6 outlines the frequency of audits by jurisdiction and how they may vary by establishment type. In some jurisdictions, the frequency and scope of audits have been increased as a result of cruelty investigations such as described in Case Study 2.

To prevent regulatory burden, in some jurisdictions agreements are in place for audits of export abattoirs to be conducted by the state or territory food regulatory authority on behalf of the Australian Government and vice versa (these export abattoirs fall under the Tier 1 scheme described above). In these circumstances, the auditing jurisdiction takes responsibility for assessing the establishment's compliance with the animal welfare requirements.

<sup>10</sup> Animal Protection Index (API) 2020, [Commonwealth of Australia: ranking D. Executive summary](#), 2020.

<sup>11</sup> [Review of animal welfare legislation in the beef, pork, and poultry industries](#). FAO Investment Centre, 2014.

<sup>12</sup> [Overview report on a series of fact finding missions in 2011 concerning animal welfare at slaughter in non EU countries with regard to future compliance with regulation \(EC\) no. 1099/2009](#), European Commission, Health & Consumer Directorate-General, Food and Veterinary Office, 2011.

**Table 6:** Regulatory animal welfare audit frequency by state and territory and establishment type

	ABATTOIRS	POULTRY PROCESSORS	KNACKERIES
<b>NSW</b>	All slaughtering establishments are audited at least once a year, may be more depending on performance Large abattoirs and poultry processors (based on the number of staff employed) receive biannual audits Audits are rated based on the number of non-compliances A – E (C is a marginal) Audit frequency is then set based on the level of compliance e.g. A grade 12 months, B grade 6 months, C grade 3 months		
<b>NT</b>	All abattoirs receive an audit annually unless a Major or Critical non-compliance is detected, if this were to be the case, a close-out audit will be required, and audit frequency is increased  Due to distance and operational frequency there is no provision for unannounced audits	N/A as no poultry processors	N/A as no knackeries
<b>QLD</b>	Annual at minimum	Annual at minimum at domestic Biannual at minimum at export Safe Food Production Queensland also conduct the audits at export registered poultry processors	Annual at minimum
<b>SA</b>	Biannual	Biannual at minimum	Annual at minimum
<b>TAS</b>	Biannual May receive unannounced routine inspections from Biosecurity Tasmania	Biannual	Biannual
<b>VIC</b>	Quarterly (third party) Biannual (PrimeSafe unannounced inspection)	Biannual	Quarterly (third party) Those handling live animals are subject to biannual (PrimeSafe unannounced inspection)
<b>WA</b>	Biannual at minimum from Department of Health (DoH), increased to three-monthly audits if results not unsatisfactory May receive an annual inspection from Department of Primary Industries and Regional Development (DPIRD)	Biannual at minimum from DoH, increased to three-monthly audits if results not satisfactory May receive an annual inspection from DPIRD	Assessed by the relevant local government May receive an annual inspection from DPIRD
<b>Australian Government</b>	Monthly or biannual under the <u>Export Meat Systems Audit Program</u>	Quarterly (or as agreed with the state regulatory authority) <sup>13</sup>	Not conducted unless required by importing country

<sup>13</sup> Australian Government DAWE, Meat Notice 2016-06 - Current Poultry Inspection Requirements for Export, 31 August 2016.

## CASE STUDY 2

### LE GILES, TRAFALGAR, VICTORIA - 2011

Footage was taken inside the LE Giles abattoir in 2011 by a person associated with Animal Liberation Victoria. The footage was provided to PrimeSafe by Animals Australia. PrimeSafe ordered an immediate cease in processing. The footage showed:

- stunning of pigs in the eye and ear
- a pig being killed with a sledgehammer.

The abattoir's owners were advised of the intention of PrimeSafe to investigate and potentially take action. The owners elected to surrender their licence. It was reported in 2012 that the owners of the abattoir had taken their case to the Victorian Civil and Administrative Tribunal in a bid to get their licence back.

Following the incident, PrimeSafe moved to inspect all abattoirs that were the same size or smaller than the abattoir in this incident. PrimeSafe indicated that all were compliant. This was the start of PrimeSafe's animal welfare compliance program of two unannounced audits (conducted by PrimeSafe Authorised Officers) each year. In 2013, this was expanded to include knackereries.

A separate investigation was undertaken by Agriculture Victoria. In September 2012 the three slaughtermen pleaded guilty to charges of failure to ensure unreasonable pain and suffering was not endured by pigs during slaughter, however the magistrate deemed any cruelty not to have been deliberate. They were given a 12-month good behaviour bond but were not convicted. The Owner and Quality Assurance Manager were also charged with offences under the *Prevention of Cruelty to Animals Act*, with the case due to be heard in court in April 2013. However, these charges were dropped due to Agriculture Victoria's lawyers believing successful prosecution was unlikely.

#### Related Articles

[Peter Mickelborough, Abattoir shut amid animal cruelty claims, Herald Sun, 25 November 2011](#)

[Gus Goswell, After Indonesia, abattoir cruelty hits home, ABC, 7 December 2011](#)

[Gus Goswell, Abattoir accused of pig cruelty wants to reopen. ABC, 18 January 2012](#)

[Landline, Overkill \(Transcript\), ABC, 29 September 2013](#)

## Auditing - training and competency requirements

The quality of audits is dependent on the scope of the audit and the competence of the auditor. Table 7 outlines the regulatory scope of the audit in relation to animal welfare, the agency conducting the audits and the training and competency requirements of auditors (see Table 3 for further detail regarding specific animal welfare requirements under the *Australian Standards* for abattoirs, poultry processors and knackerries).

In all jurisdictions except the NT, the RSPCA has a role in enforcing state and territory animal welfare legislation through RSPCA Inspectors who are 'authorised officers' under animal welfare legislation, however, this does not generally include powers to routinely inspect slaughtering establishments. The exception is in SA, where RSPCA inspectors are required to conduct a total of four pre-arranged 'routine inspections' a year across all intensive livestock facilities, including piggeries, poultry facilities, feedlots, abattoirs, poultry processors and knackerries, as part of their funding deed with the SA Government. Additionally, in NSW and SA, the RSPCA is the investigative authority for animal welfare enforcement, including those investigations that occur following a report of animal cruelty at abattoirs, poultry processors and knackerries. In other states and territories these activities are performed by the relevant state or territory regulatory departments.

## Auditing - remote auditing

The recent and ongoing coronavirus pandemic has led to the use of technologies for remote auditing to allow slaughtering establishments to cope with operational restrictions and remain compliant with regulatory requirements. Remote auditing, using camera and sensory technologies, provides increased flexibility while reducing the overall cost and resources needed to conduct an audit. These benefits have led to questions around the potential long-term applications of these technologies as equivalents or replacements for in-person inspections and audits. However, remote auditing has several limitations in comparison to in-person auditing, including concerns around information security and confidentiality, low image and video quality, the accuracy and authenticity of evidence, and an auditor's ability to gain a full appreciation of the establishment during the audit.

## Additional animal welfare oversight requirements

To provide further confidence in compliance and ensure a set level of competence, *AS 4696:2007* requires a 'meat safety inspector' to conduct designated functions including admission of animals, ante-mortem and post-mortem inspection of livestock. Meat safety inspectors are defined as:

*'an individual who:*

- (a) is given approval by the controlling authority to inspect animals, meat and meat products, and to apply dispositions; and*
- (b) holds qualifications that are approved by the controlling authority as being qualifications required for the purpose of the inspection of animals, meat and meat products, the making of disposition and the control of hygiene.'*

There is no similar clause in *AS 4465:2006* or *AS 4841:2006*, however, some jurisdictions have implemented inspection requirements. The approval of inspectors (government, third party or company employed) and the required qualification level vary between jurisdictions as shown in Table 8.

As the training packages are set up to provide elective options, there is no guaranteed advantage in additional animal welfare training between Certificate III and Certificate IV in Meat Processing (Meat Safety). In both qualifications, there is a requirement for the completion of unit *AMPA3002 Handle animals humanely while conducting ante-mortem inspection*. This training unit focuses on skills and knowledge to minimise stress and injury at slaughtering establishments, including through handling animals in a calm and low-stress manner, understanding how to handle sick and injured animals, applying emergency procedures (including making arrangements for emergency killing), understanding the impact of poor handling (including impact of stress on meat quality), and having knowledge of animal welfare regulations.

In some jurisdictions, animal welfare training requirements for abattoirs are required as shown in Table 9, either in the form of a designated Animal Welfare Officer with formal training or training of those staff handling, stunning, slaughtering or shackling animals. As added oversight, some jurisdictions have requirements for on-site company monitoring and/or reporting including the use of CCTV cameras.

**Table 7:** Animal welfare auditing requirements by jurisdiction

	AUDITING AGENCY	AUDIT SCOPE	AUDITOR COMPETENCY
NSW	NSW Food Authority Auditors	Animal welfare is included in the scope of every audit  Licence conditions include compliance with the <i>Australian Standards</i> and for abattoirs Section 2 of the <i>Industry Animal Welfare Standards</i>  Out of approx. 60 questions during an audit, about 20 cover animal welfare e.g. stun/stick/shackle duties, competencies and monitoring of compliance as per the <i>Industry Animal Welfare Standards</i>	All staff have the Animal Welfare Officer Skill Set training
NT	Department of Primary Industry and Resources - Senior Meat Industries Officer	Compliance with the animal welfare requirements of AS 4696:2007 and for a qualified animal welfare officer in all facilities	The previous auditor (now retired) held RABQSA (now Exemplar Global) tickets in auditing poultry, meat and animal welfare and a Diploma in Auditing Animal Welfare Skill Set
QLD	Safe Food Production Queensland Approved Auditors	Compliance with the <i>Australian Standards</i>  Each audit assesses the accreditation holder's skills and knowledge as well as their awareness of commitment to and provisions for food safety  Animal welfare used as an indicator of an establishment's overall quality level, this includes taking into account external animal welfare certification and animal welfare related customer requirements	Approved Auditors have completed National Food Safety Auditor competencies and animal welfare training (including in the Animal Welfare Officer Skill Set through SEQTAFF)
SA	Meat Hygiene Section of Primary Industries and Regions South Australia or an approved private audit company  RSPCA SA may also conduct pre-arranged 'routine inspections'	Compliance with the Meat Food Safety Scheme including the <i>Australian Standards</i>  Legislated animal welfare requirements  RSPCA SA routine inspections are limited to a total of 4 per year across all intensive livestock facilities and includes abattoirs, poultry processors and knackerries (reasonable prior notice is required)	Food Safety Auditors with audit qualification however they are not animal welfare inspectors  RSPCA SA inspectors must undertake specific training and authorisation in order to undertake routine inspections, however there is no specific training course available
TAS	Biosecurity Tasmania Auditors	Compliance with the Meat and Poultry Food Safety Scheme that includes the requirements of AS 4696:2007  AS 4465:2005 is used as technical guidance, but not regulated	No auditor training requirements

	AUDITING AGENCY	AUDIT SCOPE	AUDITOR COMPETENCY
VIC	Outsourced third party audits PrimeSafe (unannounced inspections)	Compliance with animal welfare requirements of the relevant <i>Australian Standards</i> (Section 7 of AS 4696:2007, Sections 5, 6 & 15 of AS 4465:2005 and Section 6.9 of AS 4841:2006) PrimeSafe set the frequency of the third-party audits and review audit reports Critical non-conformances must be immediately reported; the auditor is not allowed to leave the site until action has been taken (this can include stoppage through a verbal notification)	National Food Safety Auditor level 4 plus competency in abattoirs, knackeries or poultry slaughter and boning units or equivalent PrimeSafe authorised officers have undertaken Animal Welfare Officer Skill Set training including handling and overseeing humane slaughter
WA	Department of Health (DoH) Auditors Department of Primary Industries and Regional Development (DPIRD)	DoH audits cover animal welfare as prescribed in the <i>Australian Standards</i> from arrival through handling, stunning and bleeding DPIRD have an animal welfare unit that audit/ assess the premises including the race and stunning facilities	National Food Safety Auditor and Lead Auditor competencies are required Some animal welfare training is required and provided including recently offered MINTRAC Emergency Animal Disease Preparedness training sessions
Australian Government	DAWE Officers or agreed state or territory regulatory authority auditors	Compliance with the <i>Export Control Act 1982</i> and its subordinate Orders and Regulations for: Animal Welfare and Handling, Approved Suppliers, Chemicals, Good Hygienic Practice, Pest Control, Hazard Analysis and Critical Control Points (HACCP) Plan/Non-conforming product controls, Product Supply Chain Integrity, Quality Systems Support, Refrigeration, Sanitation, Structure and Equipment, Water, and Importing Country Requirements, including those listed on the Registration Certificate  Note: Where a monthly audit schedule is in place, the audit criteria assessed each month is rotated, meaning all criteria are not assessed each month  Where a biannual audit schedule is in place, all audit criteria are assessed during the audit	Abattoirs are audited by Area Technical Managers or Field Operation Managers who hold veterinary qualifications Poultry Processors are audited by Food Safety Auditors <sup>14</sup>

<sup>14</sup> Australian Government DAWE, [Meat Notice 2016-06 - Current Poultry Inspection Requirements for Export](#), 31 August 2016.



**Table 8:** Meat safety inspection approval and qualification level by jurisdiction and processing type

	ABATTOIRS	POULTRY PROCESSORS	KNACKERIES
<b>NSW</b>	At least one company meat safety inspector with Certificate IV on site at all times, may have additional Certificate III meat safety inspectors under the supervision of a Certificate IV meat safety inspector	No inspection requirements	No inspection requirements
<b>NT</b>	Company meat safety inspector with Certificate III	N/A as no poultry processors in the NT	N/A as no knackeries in the NT
<b>QLD</b>	Company meat safety inspector with Certificate IV	Company person required to be trained in hygienic poultry processing Company veterinarian/ approved internal training for ante- and post-mortem disposition	Company person required to be trained in ante- and post-mortem disposition, and zoonotic disease identification, may have a Certificate III or IV
<b>SA</b>	Company meat safety inspector with Certificate III (at minimum) or Certificate IV	No inspection requirements	No inspection requirements
<b>TAS</b>	Meat safety inspector required to be competent as per <i>AS 4696:2007</i>	Company person required, no training requirements	Company person required, no training requirements
<b>VIC</b>	Company meat safety inspector with Certificate III	No inspection requirements	No inspection requirements Trained in zoonotic disease identification and post-mortem requirements to report diseases to Agriculture Victoria
<b>WA</b>	Meat safety inspector required to be competent as per <i>AS 4696:2007</i> Company inspector at Tier 1 export abattoirs are authorised by the Department of Health Meat safety inspectors at domestic abattoirs are authorised by the relevant local government agency, and employed by either the local government agency or the company	No inspection requirements	No inspection requirements
<b>Australian Government</b>	Company, third-party or government Food Safety Meat Assessors or Authorised Officers conduct the meat safety inspector's role with Certificate IV Additional: On-Plant Veterinarian conducts or supervises ante-mortem and post-mortem inspections, and also conducts weekly animal welfare verification of the company's Approved Arrangement	No inspection requirements at some poultry processors For some export markets, a Food Safety Meat Assessor or On-Plant Veterinarian is required to be present for ante-mortem and/or post-mortem inspection	No inspection requirements

**Table 9:** Additional animal welfare oversight requirements at abattoirs

	ANIMAL WELFARE OFFICER (AWO)?	ANIMAL WELFARE TRAINING OF COMPANY STAFF	ON-SITE MONITORING AND REPORTING ON ANIMAL WELFARE	CCTV CAMERAS MANDATORY?
<b>NSW</b>	Yes, designated AWO required to be on the premises while processing is occurring  The AWO may have other duties e.g. quality assurance (QA) officer, but must have the capacity to routinely monitor the requirements for animal welfare within the Approved Arrangement or Quality Assurance Arrangement	Registered training organisation training and certification of the component of the AMP Australian Meat Processing Training Package for the roles of stun, stick, and shackle are a licence requirement  AWO must be trained in the relevant component of AMP	Large abattoirs are required to do monitoring and reporting as per <i>Industry Animal Welfare Standards</i> (Appendix 7: Monitoring procedures) or equivalent  Smaller abattoirs can adapt Appendix 7 to have an equivalent level of monitoring as long as the principles are maintained and verified e.g. an abattoir processing 20 sheep/day may monitor 5 rather than 100 animals	Yes, for abattoirs and large poultry processors CCTVs are required as a monitoring tool, reviewed daily and reviewed at audit
<b>NT</b>	Yes	Company managers, meat inspectors and yard staff are expected to be trained in animal welfare, with continuous improvement occurring  Access to training courses is an issue	Required to advise animal welfare issues to Department of Primary Industry and Resources which may be referred to the Animal Welfare branch	No
<b>QLD</b>	No	Yes, for those handling live animals	If the company becomes aware, or forms a suspicion, that the primary producer (farmer) does not comply with relevant requirements, they must notify Safe Food Production Queensland  Notification provisions as per section 36 of the Food Production (Safety) Regulation 2014	No
<b>SA</b>	No, but some processors may have a dedicated AWO as per company requirements	No formal requirement, some processors may require attendance as per company policy, training delivered by recognised facilitators encouraged and occurs	Required to keep ante-mortem inspection records  Staff are required to adhere to company policy and procedures to ensure compliance  Breaches in animal welfare are required to be reported to RSPCA SA for investigation	No
<b>TAS</b>	No	No specific training is required	Breaches in animal welfare should be reported to Biosecurity Tasmania or RSPCA Tasmania via the Emergency Animal Disease Hotline	No

	ANIMAL WELFARE OFFICER (AWO)?	ANIMAL WELFARE TRAINING OF COMPANY STAFF	ON-SITE MONITORING AND REPORTING ON ANIMAL WELFARE	CCTV CAMERAS MANDATORY?
<b>VIC</b>	No, however access to a private or government vet is required (i.e. a local vet is on call)	Ensure manufacturer's instructions are followed for equipment use and staff must demonstrate competent animal handling skills as per the <i>Australian Standards</i> requirements	Ante-mortem inspection records of animals are required to be kept; some companies have picked up the monitoring that PrimeSafe undertake during animal welfare inspections  Breaches in animal welfare should be reported to Agriculture Victoria	No, except for abattoirs during unstunned slaughter, reviewed daily and during PrimeSafe animal welfare inspections, and kept for 12 months
<b>WA</b>	No, but there must be a designated person identified under the company's animal welfare system within the Approved Arrangement or Quality Assurance Arrangement	Attendance at MINTRAC training is encouraged and occurs. Stockmen are required to be able to identify disease	Staff are required to be able to monitor the company's system to ensure compliance occurs  If there is a breakdown in animal welfare compliance, the issue should be recorded and reported to the state authority	No
<b>Australian Government</b>	Yes, for companies exporting to the EU  No, for other markets	No specific training is required	DAWE officers and company staff must be able to monitor the company's system to ensure compliance occurs  Companies exporting to the EU must conduct the monitoring requirements listed in the <i>Industry Animal Welfare Standards</i> (Appendix 7: Monitoring procedures)  Animal welfare breaches must be reported by the company and government staff to the relevant state or territory authority as per Meat Notice 2016-07 <sup>15</sup>	No

<sup>15</sup> Australian Government DAWE, [Meat Notice 2016-07 - Managing animal welfare concerns at export registered red meat and pork slaughtering establishments](#).

## Enforcement actions

As described previously, there is a separation between food safety and animal welfare legislation. Abattoirs are licensed and regulated through the food safety authorities, with animal welfare legislation enforced through the state or territory government and/or the RSPCA Inspectorate. This means that coordination across the jurisdictions for food regulation and the departments enforcing and investigating animal welfare is required. Table 10 provides details of the action taken in the case of an animal welfare incident or complaint and the relevant investigating agency.

**Table 10:** Investigative authority and action taken in the event of an animal welfare incident or complaint by state and territory

	INVESTIGATIVE AUTHORITY	ACTION TAKEN
NSW	Offences related to licensing, <i>Australian Standards</i> or the <i>Model Code</i> – NSW Food Authority Offences related to the <i>Prevention of Cruelty to Animals Act 1979</i> (POCTA Act) - RSPCA NSW Inspectorate	If there are animal welfare issues at a slaughtering establishment under Food Licensing, NSW Food Authority investigates in line with the <i>Australian Standards</i> , and RSPCA NSW investigates in line with the <i>POCTA Act</i> There is a clear definition between license conditions and the requirements of the <i>POCTA Act</i>
NT	Biosecurity and Animal Welfare Branch, Department of Primary Industry and Resources (DPIR)	The Animal Welfare Officer investigates complaints and breaches, taking into account prosecution requirements Technical livestock advice is provided by other DPIR staff such as the Senior Meat Industries Officer
QLD	Biosecurity Queensland, Department of Agriculture and Fisheries	Safe Food Production Queensland is required to report any animal welfare concerns observed or identified on-site to Biosecurity Queensland who are responsible for taking further action if required
SA	RSPCA SA Inspectorate	Department of Environment and Water hold a Funding Deed providing RSPCA SA with enforcement powers under the <i>Animal Welfare Act 1985</i> Biosecurity SA, Primary Industries and Regions South Australia (PIRSA) provide support, assistance and technical advice to RSPCA SA, where animal welfare incidents involve livestock when available Appropriate PIRSA staff are also appointed as inspectors to enable powers and authority to be used in urgent circumstances PIRSA (and the Australian Government DAWE through PIRSA) provide RSPCA SA with any reported non-compliance of the <i>Animal Welfare Act 1985</i> or regulations for investigation
TAS	Biosecurity Tasmania Animal Biosecurity and Welfare Branch (ABWB) RSPCA Tasmania Inspectorate	Complaints are reported on the Emergency Animal Disease Hotline to Biosecurity Tasmania or RSPCA Tasmania Action can be taken by Biosecurity Tasmania or RSPCA Tasmania, but generally Biosecurity Tasmania ABWB inspectors attend complaints for livestock in transport or at slaughtering establishments
VIC	Domestic abattoir – PrimeSafe On farm - Agriculture Victoria On farm is defined by the <i>Meat Industry Act 1993</i> as are provisions for when the <i>Meat Industry Act 1993</i> does not apply (e.g. home slaughter in Section 5 of the Act)	Depends on the licensing and location PrimeSafe, the Australian Government DAWE and/or Agriculture Victoria investigate together, especially if it is not clear which legislation has been breached

	INVESTIGATIVE AUTHORITY	ACTION TAKEN
<b>WA</b>	Department of Primary Industries and Regional Development (DPIRD) through the administration of the <i>Animal Welfare Act 2002</i>	Both DPIRD and Department of Health audit aspects of animal welfare Animal welfare reports about cruelty are made to RSPCA WA and may be referred to DPIRD who is responsible for investigations By agreement with DPIRD, RSPCA WA follows up reports about horses
<b>Australian Government</b>	The appropriate state or territory jurisdiction as detailed in <i>Meat Notice 2016-07</i> (updated every 6 months)	Animal welfare breaches in export abattoirs are reported by the abattoir to the DAWE employee (On-Plant Veterinarian) Animal Welfare Incident Reports are submitted to the relevant state or territory authority by the abattoir or On-Plant Veterinarian, as per <i>Meat Notice 2016-07</i> The abattoir is expected to take immediate corrective action to stop further pain and suffering of the animal(s)

At export abattoirs (excluding Tier 1 establishments), the relevant state or territory regulatory authority has oversight obligations for animal welfare but relies on the Australian Government DAWE to report any concerns. Regardless of whether an export establishment is AAWCS-certified (see p19), the DAWE is responsible for verifying animal welfare. The On-Plant Veterinarian and abattoir management are responsible for monitoring and reporting any animal welfare incidences to the relevant state or territory authority through an Animal Welfare Incidence Report. Additionally, at AAWCS-certified export registered establishments, establishment management is responsible for reporting animal welfare related non-conformances and outcomes of investigations from AUS-MEAT audits to the DAWE.

At domestic abattoirs, poultry processors and knackeries, where there is no regular oversight presence, there is no routine reporting process for animal welfare concerns other than through complaints made by employees or members of the public. The relevant state or territory authority may then investigate these complaints. Otherwise, it is only during audits by the relevant state or territory authority that an animal welfare concern could be noted and may lead to enforcement action or further investigation. Where animal welfare breaches occur during transport, some jurisdictions (e.g. Queensland) require mandatory notification when an animal that was not fit for transport is received at a slaughtering establishment.

There are a number of enforcement actions that can be taken by the jurisdiction dependent upon the level and/or extent of non-compliance or breach of animal welfare or cruelty identified. These actions could include:

- Corrective Action Request (CAR)
- direction to take specific action (including to stop processing)
- penalty infringement notice (including fines)
- increased regulatory presence including increased audit frequency
- licence suspension
- licence cancellation
- prosecution of an individual or the company for animal cruelty.

Case Study 3 describes an incident from 2017 where an investigation into alleged cruelty at a Victorian poultry processor resulted in a number of steps to address the situation through remedial action but did not result in a prosecution.

Some non-compliances with animal welfare requirements may not have adverse consequences for animals. For example, a record that has not been signed or completed properly is evidence of non-compliance with the company's Approved Arrangement or Quality Assurance Arrangement, however, it is not evidence of animal cruelty.

### CASE STUDY 3

## STAR POULTRY, KEYSBOROUGH, VICTORIA - 2017

Footage was secretly taken inside the Star Poultry processing facility in 2017 by animal activists. The footage was provided to PrimeSafe in March 2017, who investigated and substantiated the complaint. The abattoir continued to operate during the investigation. The footage showed a chicken that was still conscious prior to entering the scalding baths. Following the investigation, PrimeSafe instigated enforcement action which included:

- Staffing changes
- Changes to back-up slaughter arrangements
- Provision of staff training by a registered training organisation to support improvements in animal handling and back-up slaughter
- Increased regulatory oversight until consistent implementation of improvements.

The processor had been audited four times in the 12 months prior to the incident. Poultry processors undergo two announced audits (that are conducted by third party auditors) and two unannounced audits (conducted by PrimeSafe Authorised Officers) each year.

The footage was referred to Agriculture Victoria by PrimeSafe. Agriculture Victoria conducted an investigation into animal welfare allegations, including review of available evidence and multiple visits to the processor. No further action was taken as some critical witnesses were unwilling to participate in the current investigation or in any further proposed future prosecutions. The investigation also identified that remedial action undertaken by the company had rectified the animal welfare issues identified by PrimeSafe.

### Related Articles

[Pat McGrath, Chickens boiled alive at Star Poultry Supply abattoir in Melbourne, secret footage reveals, ABC, 16 November 2017](#)

[The Greens Victoria, Questions without notice – animal welfare, 30 November 2017](#)

In order to prosecute an individual or company for a breach of the relevant state or territory animal welfare or cruelty legislation, evidence of a breach must be gathered by the authorities. During the investigation, government departments cannot release detailed information about the investigation, but they are permitted to disclose whether an investigation is underway. If an incident is believed to have breached the legislation and sufficient evidence is obtained, then the government can take enforcement action through prosecution.

The state and territory regulators interviewed for this report provided general information on the types of complaints received and reported no major breaches of animal welfare legislation and no prosecution of breaches in the last five years.

The NT noted that an unfit to load case was taken to court, however, it was not successfully prosecuted due to insufficient evidence. As a result, the NT Department of Primary Industries and Regional Development have since trained all officers in a *Certificate IV in Government Investigation* to ensure correct and sufficient evidence is collected in the future.

Although there are multiple jurisdictions and authorities involved in regulating the welfare of animals at slaughtering establishments, there appears to be no duplication in enforcement activities. When asked if there were any hurdles to enforcement and prosecution of identified animal welfare breaches, the states and territory were generally comfortable with the compliance tools that are available. The lack of specific legislation to regulate knackeries in WA was raised, noting that welfare concerns can currently be dealt with under the *Animal Welfare Act* by the WA Department of Primary Industries and Regional Development. PrimeSafe in Victoria also raised that there is currently a submission to include animal welfare in Section 74 (Powers of Chief Executive Officer) of the *Meat Industry Act 1993* to allow for prohibition notices to be issued for animal welfare breaches.

## Transparency

Public information on the number of Animal Welfare Incident Reports or complaints submitted to state and territory regulatory authorities is not consistently available. There is also a lack of information on the outcome of investigations and identified animal welfare non-compliances. For example, in Victoria, PrimeSafe report annually on the number of complaints received and the number of those complaints that were substantiated, however, no information is provided as to the nature of these complaints. In the [2018/19 Annual Report](#), of the 13 animal welfare-related complaints received, five were substantiated and, as a result, PrimeSafe expanded their animal welfare surveillance program and amended the animal welfare monitoring licence conditions (e.g. by requiring CCTV to be operational at establishments conducting unstunned slaughter). For another example, in NSW, the NSW Food Authority has a '[Name and shame](#)' database where businesses that have breached or are alleged to have breached NSW food safety laws are listed. Penalty notices or prosecutions relating to an abattoir or poultry processor may be listed on this database, however the database does not provide specific details relating to the offence and therefore it may be unclear if these offences relate to animal welfare or not.



# Regulatory gaps

Regulatory systems for the management of slaughtering establishments in Australia are multifaceted.

The results of this regulatory analysis show that each jurisdiction has focused on different areas of regulation and enforcement, likely due to differences in the regulatory and policy environment, their available resources, past experiences and their responses to specific incidents of animal cruelty. There are also significant differences between the regulation of animal welfare in abattoirs, poultry processors and knackerries in terms of the level of oversight and audit frequency required. It may be that different combinations of regulatory approaches can lead to the same outcomes, but understanding where the regulatory gaps exist is an important step towards improving the standard and consistency of animal welfare at slaughtering establishments.

To compare the effectiveness of federal, state and territory regulation of animal welfare at slaughtering establishments, a nominal scoring system was developed based on seven key facets:

- A. Animal welfare requirements
- B. Audit frequency
- C. Auditor training
- D. Oversight
- E. CCTV use
- F. Company training
- G. Transparency

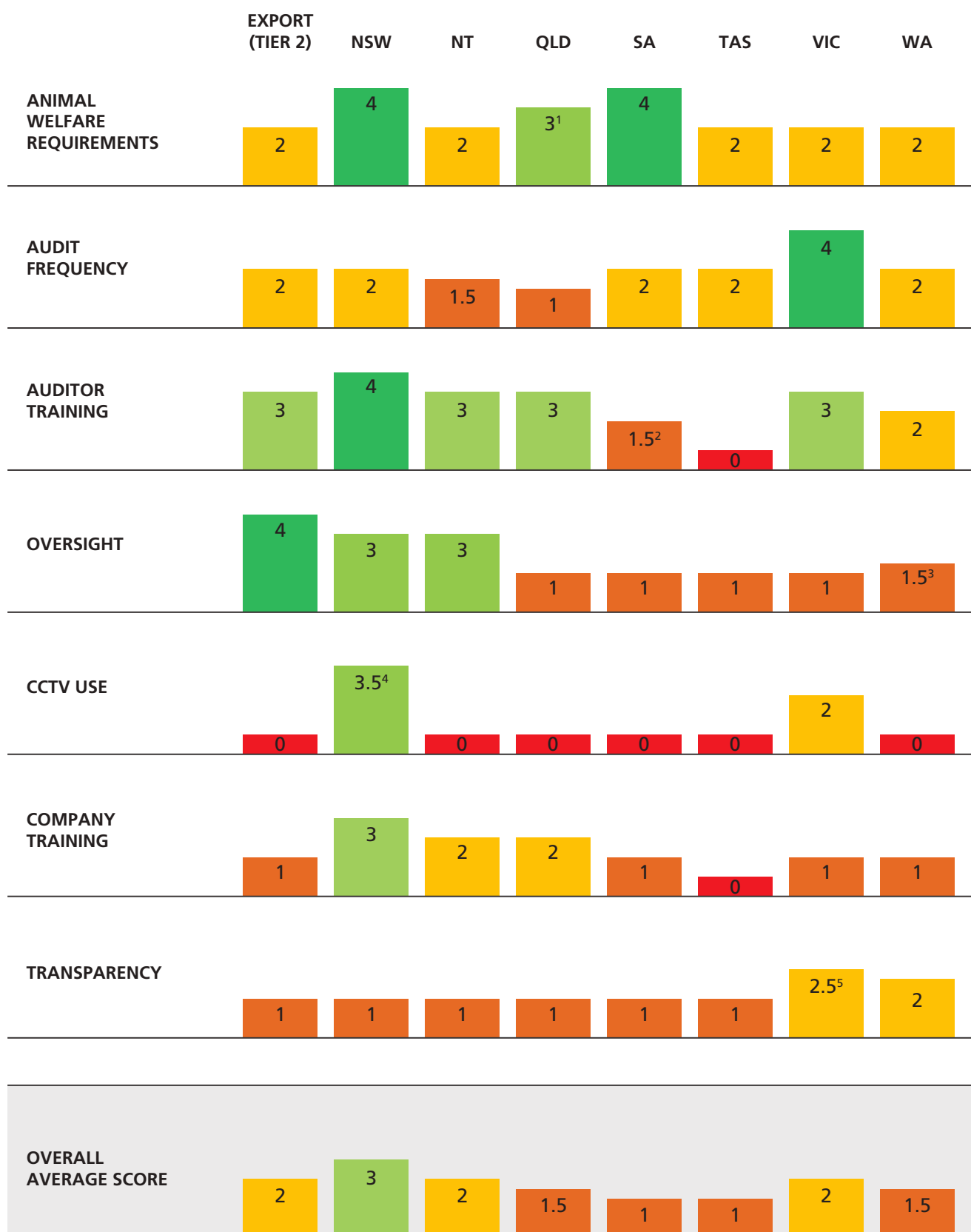
These key facets were chosen for their effectiveness in ensuring compliance with animal welfare standards and ensuring public confidence in the regulation of animal welfare (Table 11). Each facet was scored using a scale of zero to four, where by zero is the least effective and four is the most effective. The results of this analysis are displayed using a traffic-light coloured scoring system in Table 12a, 12b and 12c.

**Table 11:** Nominal scoring system for the key facets of the regulatory system

<b>A ANIMAL WELFARE REQUIREMENTS</b>	
0	<i>Australian Standards - missing</i>
2	<i>Australian Standards (AS 4696:2007, AS 4465:2006 or AS 4841:2006)</i>
4	<i>Australian Standards plus regulation of the Model Code</i>
<b>B AUDIT FREQUENCY</b>	
0	None
1	Annual
2	Biannual
3	Quarterly
4	3 plus additional unannounced animal welfare inspections
<b>C AUDITOR TRAINING</b>	
0	Certified Food Safety training
1	0 plus certified auditor training
2	1 plus general animal welfare training
3	2 plus certified Animal Welfare Officer training or Veterinary qualification*
4	3 plus government investigation training
<b>D OVERSIGHT</b>	
0	Nil
1	Company meat inspectors
2	Third-party meat inspectors
3	Company animal welfare officer
4	Qualified veterinarian
<b>E CCTV USE</b>	
0	None
2	Required in part
4	Required (mandatory)
<b>F COMPANY TRAINING</b>	
0	None
1	Australian Standard competency requirements
2	1 plus additional animal welfare training
3	2 plus certified animal welfare training on specific aspects (e.g. stun or stick)
4	3 plus certified animal welfare training courses on all aspects
<b>G TRANSPARENCY</b>	
0	No public information
1	Accessible information on minimum animal welfare requirements
2	1 plus number of each type of slaughter establishments and species slaughtered
3	2 plus number of animal welfare complaints and description of outcomes and actions taken
4	3 plus number of approved arrangements for unstunned slaughter and species slaughtered

**\*Note:** On-Plant Veterinarians or Area Technical Managers at export abattoirs require a veterinary qualification and undertake food safety, auditor, and animal welfare training through the DAWE but this training is not externally certified.

## ANIMAL WELFARE SCORECARD FOR ABATTOIRS BY JURISDICTION



1 The *Model Code* is only a voluntary code under regulations

2 Food safety auditors do not audit animal welfare, but RSPCA SA inspectors can undertake routine inspections

3 Meat inspectors may be either company or local government employed

4 All large abattoirs are required to have CCTV which is reviewed during audits

5 Primesafe annual report contains only limited information on the number of animal welfare complaints

## ANIMAL WELFARE SCORECARD FOR POULTRY PROCESSORS BY JURISDICTION



1 The *Model Code* is only a voluntary code under regulations

2 Food safety auditors do not audit animal welfare, but RSPCA SA inspectors can undertake routine inspections

3 Some countries require government meat inspectors or veterinarians for ante-mortem and post-mortem inspection

4 Company person trained in hygienic poultry processing and receives company training on ante- and post-mortem inspection

5 All large poultry processors are required to have CCTV which is reviewed during audits, smaller processors may not have CCTV

6 Primesafe annual report contains only limited information on the number of animal welfare complaints

## ANIMAL WELFARE SCORECARD FOR KNACKERIES BY JURISDICTION



1 The *Model Code* is only a voluntary code under regulations

2 Food safety auditors do not audit animal welfare, but RSPCA SA inspectors can undertake routine inspections

3 Company person trained in zoonotic disease identification, and ante- and post-mortem inspection

4 Company person trained in zoonotic disease identification and post-mortem inspection

5 Primesafe annual report contains only limited information on the number of animal welfare complaints

# Recommendations

## Animal welfare requirements

Across the jurisdictions there is similarity in terms of the responsibility for the regulation of food production sitting with the food regulatory authority, and responsibility for animal welfare regulation sitting with the Department of Agriculture or its equivalent.

There are, however, significant inconsistencies between jurisdictions in their regulatory requirements for animal welfare across abattoirs, poultry processors and knackeries, and between domestic and export registered establishments.

The requirements for compliance with the *Australian Standards*, the *Model Code*, and other conditions affecting animal welfare outcomes, vary considerably across jurisdictions.

There is a variation across jurisdictions in the classification of knackeries and therefore a variation in whether *AS 4696:2007* or *AS 4841:2006* is used. For example, Safe Food Production Queensland require compliance with *AS 4696:2007* and the *Model Code*, whereas in WA, knackeries are not directly regulated under legislation.

The *Model Code*, which provides the most detail in terms of animal welfare requirements and includes abattoirs, poultry processors and knackeries in its scope, is outdated and unenforceable, due to the discretionary nature of its wording and its lack of reference under legislation in several jurisdictions. It has not been reviewed since its endorsement in 2000. In addition, the *Model Code* does not provide specific provisions for the full range of species of animals it covers for all points of processing from

arrival until confirmation of death, including unloading, holding pen and race design, general handling, emergency killing, stunning and slaughter requirements.

This is especially problematic for idiosyncratic animals such as horses, deer and calves. Species-specific standards are urgently needed for horses that cover facilities for unloading and holding of trained and unbroken horses, low-stress handling techniques and requirements as well as detailed requirements on restraint, stunning and bleeding out method.

The progression and endorsement of the draft national *Australian Animal Welfare Standards and Guidelines for Livestock at Processing Establishments* provides the first opportunity in two decades to address these inconsistencies and deficiencies, as well as recognise developments in technology and our understanding of animal welfare since the *Model Code* and *Australian Standards* were introduced. Ensuring the *Standards and Guidelines* apply to all slaughtering establishments (abattoirs, processing plants and knackeries) would provide a consistent approach regardless of the purpose of slaughter.

Most regulators stated that they were comfortable with the sanction and enforcement tools that are available for action to be taken where a case of non-conformance or a breach to the animal welfare requirements is identified. However, further steps can be taken to strengthen the enforcement and sanctions available to regulators to support improvements in regulation of animal welfare.

Implementing national *Standards and Guidelines* through referencing in both the relevant *Food Act* and *Animal Welfare Act* of each jurisdiction could establish a consistent regulatory mechanism for implementing minimum animal welfare standards in all jurisdictions. Further, it could provide all regulators with a clear avenue to apply sanctions against a specific company when non-compliances are identified.

The *Industry Animal Welfare Standards* are more up-to-date and contain more detailed species-specific requirements for animal welfare than the *Model Code*. For this reason, the *Industry Animal Welfare Standards* are often included in the licensing agreement of an abattoir, however, these standards do not apply to poultry processors or knackerries. On completion, if the revised national *Standards and Guidelines* are mandatory and include animal welfare requirements of an equal or higher level than the industry standards, this would remove the need for the *Industry Animal Welfare Standards* as a licensing requirement at abattoirs and allow for consistency in animal welfare requirements at abattoirs, poultry processors and knackerries.

**Recommendation 1** – The development of *Australian Animal Welfare Standards and Guidelines for Livestock at Processing Establishments* (applicable to cattle, sheep, goats, horses, pigs, deer, buffalo, camels, alpaca, donkeys and poultry) to replace the *Model Code* must be urgently prioritised.

**Recommendation 2** – The *Standards and Guidelines* must include species-specific standards where requirements differ for all points of processing from arrival until confirmation of death, including unloading, holding pen and race design, general handling, emergency killing, stunning and slaughter requirements. The *Standards and Guidelines* must include a requirement that they are independently reviewed and updated every 5 years to reflect scientific and technical developments.

**Recommendation 3** – Once endorsed, the *Standards and Guidelines* must be made a regulatory requirement for all abattoirs, poultry processors and knackerries through referencing in the relevant legislation in each jurisdiction.

## Audit frequency

All jurisdictions have audits conducted by the food regulatory authority. Non-conformances or breaches in animal welfare are raised with the Department of Agriculture or its equivalent for investigation by them or the state RSPCA. Audits are conducted at a minimum annually, however audit frequency varies across jurisdiction and type of slaughtering establishment. For example, in Victoria, audits at abattoirs and knackerries are conducted quarterly by a third-party company, biannually at poultry processors, with only abattoirs having twice-yearly unannounced animal welfare inspections from PrimeSafe. Whereas, in WA, audits of abattoirs and poultry processors are biannual, but no audits of knackerries are conducted as they are not required under legislation. In NSW and Victoria, audit frequencies can be increased if there are non-conformances, breaches identified, or complaints raised as the audit frequency is based on compliance ratings.

**Recommendation 4** – Audits must be conducted at a minimum of quarterly at abattoirs, poultry processors and knackerries. Audit frequency must be based on a compliance rating with audit frequency increased if breaches or non-conformances are identified.

## Auditor training

All auditors have received some animal welfare training, however, the level of training varies and is reliant on the availability of resources within the jurisdictions.

Animal welfare training for auditors should be similar to the *Animal Welfare Officer Skill Set* requirements. Training would improve consistency in regulatory oversight, compliance and enforcement. Training must cover all aspects of animal welfare from arrival of animals at the establishment to the point at which death of the animal is confirmed.

There is a variation in investigation procedures and processes between jurisdictions (see Table 10). Breaches or non-conformances against animal welfare requirements are also recorded and reported differently in each jurisdiction. For example, in Victoria, there is a seamless process with representatives of both pieces of legislation (PrimeSafe and Agriculture Victoria) attending together to investigate, gather the correct evidence and ensure timeliness of the investigation. In Queensland, Safe Food Production Queensland is required to report animal welfare concerns to Biosecurity Queensland who are responsible for taking further action if required.



Successful prosecutions of animal welfare breaches are relatively rare. In Victoria, a livestock transporter was successfully prosecuted and fined in 2019, for two charges relating to animal cruelty for a consignment of sheep being transported to a Victorian abattoir in May 2018. In Queensland, three individuals were charged in 2020 for breaching the *Animal Care and Protection Act 2001* following animal cruelty claims and video footage at an abattoir. The charges were successfully prosecuted with the individuals being found guilty of animal cruelty and fined. The NT noted that they had taken a fit-to-load case to court but due to insufficient and incorrect evidence gathered it was not pursued further. As a result, the NT has trained all their officers in a *Certificate IV in Government Investigation* to ensure correct and sufficient evidence is collected in future cases. The three Case Studies presented here identify some of the issues with achieving a successful prosecution, including lack of critical witnesses. Support through additional training in animal welfare auditing and investigation requirements would strengthen regulatory oversight of animal welfare across all jurisdictions and help improve evidence-gathering practices.

Government funding to an appropriate level will be required to ensure relevant jurisdictions are adequately resourced (both financially and through staff availability) so that the required training can be provided to auditors and investigators.

**Recommendation 5** – Where animal welfare is part of the scope of an audit, a minimum level of training in animal welfare, equivalent to Animal Welfare Officer training must be required and held by auditors to cover all aspects of live animal handling at the slaughtering establishment.

**Recommendation 6** – Those officers who undertake investigations to enforce animal welfare legislation (through the implementation of the national *Animal Welfare Standards and Guidelines*) must be required to have both training in animal welfare, equivalent to Animal Welfare Officer training, as well as the *Certificate IV in Government Investigation* as is currently applied in the NT.

**Recommendation 7** – On-going state, territory and federal government funding must be dedicated towards training and capacity building for all staff, auditors and investigators to help ensure high animal welfare standards and that non-compliance with animal welfare standards at abattoirs, poultry processors and knackerries is identified and addressed.

## Oversight and CCTV use

Monitoring of animal welfare compliance is a requirement under the *Industry Animal Welfare Standard*, however, not a requirement of the *Australian Standards* or the *Model Code*. The current method of animal welfare oversight, relying upon public complaints or audit finding is inadequate at providing assurance and demonstrating slaughtering establishment compliance with animal welfare requirements.

In Victoria, PrimeSafe have found that a number of slaughtering establishments (abattoirs and poultry processors) have started to conduct similar monitoring checks as PrimeSafe carries out during their animal welfare inspections. This company monitoring allows companies to check their own compliance with the regulation and is used as evidence during audits.

Slaughtering establishments should be required to monitor all areas where live animals are handled. Monitoring should be carried out through both in-person real-time visual monitoring and recording as well as through assessment of CCTV camera (or alike) footage. This self-monitoring of compliance should be fully documented as part of the Approved Arrangement or Quality Assurance Arrangement of the slaughtering establishment. It should be used by the establishment for continual improvement and conducted on the basis of risk. Breaches and consequent action taken should be required to be reported to the regulatory authority to, in turn, use for monitoring and in-company compliance risk models. CCTV footage should also be available for routine observation by the regulatory authority.

**Recommendation 8** – To demonstrate ongoing animal welfare compliance, all slaughtering establishments must be required to conduct on-going verification of animal welfare through monitoring protocols (reflecting the relevant provisions of the current *Australian Standards*, and then the *Australian Animal Welfare Standards and Guidelines* when they are adopted) and licensing and/or registration requirements.

**Recommendation 9** – All slaughtering establishments must have an Animal Welfare Officer who is competent in all facets of production and who is responsible for the oversight of animal welfare at the facility and for reporting breaches of animal welfare to management to ensure appropriate actions are taken to address breaches.

**Recommendation 10** – Equipment for remote monitoring (e.g. CCTV) of procedures must be installed in livestock processing facilities and reviewed for internal plant operation. This equipment must allow a clear view of all areas where live animal handling occurs, including unloading facilities, lairage areas, restraint, stunning, shackling, and sticking processes.

## Company training

The general requirements for the level of company staff training are reflected in the *Australian Standards* as outcome-based requirements for competency in the given task. The requirements to demonstrate competency vary between the jurisdictions. For example, NSW prescribes specific training and certification by registered training organisations for the roles of shackling, stunning, or sticking animals in the licensing conditions of an establishment and the requirements for an Animal Welfare Officer. The NT also requires an Animal Welfare Officer, however, the regulator has advised that there is limited access to relevant training by registered training organisations in the NT.

A nominated Animal Welfare Officer should have completed certified animal welfare officer training and should be responsible for ensuring that staff handling live animals have completed their necessary training courses. Staff who handle, shackle, stun, and stick animals should be competent in their roles as is currently required under the *Australian Standards* and understand the legal requirements of the role. Training must cover all aspects of animal welfare as relevant to the staff member's duties, from arrival of animals at the establishment to the point at which death of the animal is confirmed.

In order to expedite implementation and uptake, and ensure access to training, this training should be funded, or at a minimum subsidised, through the vocational education training system. Noting turnover of staff experienced in Australian slaughtering establishments, access to this funding should be supported on an on-going basis by the state or territory and federal governments.

**Recommendation 11** – A minimum level of training must be mandated as a licensing and/or registration requirement for all staff involved in activities that impact animal welfare at abattoirs, poultry processors and knackerries. Training must be certified by a registered training organisation.

## Transparency

Compiling this report has highlighted the lack of transparency surrounding slaughtering establishment regulation in Australia and just how difficult it is for consumers and the broader public to understand the animal welfare regulatory system. This is exacerbated by jurisdictional differences in regulation, and the division of responsibility for animal welfare across state and territory government agencies representing food safety and animal welfare. Given the scale and scope of the meat processing industry and its importance to the Australian economy, this lack of transparency is a significant risk to its ongoing social licence.

In order for the public to have confidence that the meat they and their animals consume comes from animals that are humanely killed, they need to be provided with clear information on the minimum standards in place to protect the welfare of animals across all slaughtering establishments, and on how and when the standards are enforced. This includes information on unstunned slaughter arrangements under the provision of ritual slaughter for abattoirs and poultry processing plants, and details of minimum standards and variations for unstunned slaughter depending on the species of animal. Where incidents of alleged cruelty are brought to light, the public also needs to be able to track the progress of these investigations and their resulting outcomes.

**Recommendation 12** – Information on each regulatory authority's compliance and enforcement framework for animal welfare standards in abattoirs, poultry processors and knackerries must be made publicly available and be easily accessible. This must include details of what the minimum animal welfare standards and regulatory requirements are for: audit scope and frequency, auditor training, oversight (regulatory authority) training, company training and CCTV use.

**Recommendation 13** – Detailed reporting of the following information must be publicly available and updated annually:

- The number of export and domestic abattoirs, poultry processors and knackerries operating in each jurisdiction, as well as the species and number of animals slaughtered.
- The number of audits undertaken at each slaughtering establishment and the outcome of each of those audits, including details where critical non-compliances have occurred.
- The number of Animal Welfare Incident Reports or complaints submitted per slaughtering establishment, including details on the nature of the report or complaint as well as a descriptive outcome of the investigation findings and action taken.
- The type and number of slaughtering establishments operating under an Approved Arrangement that allows unstunned slaughter and the number of each species of animal subjected to unstunned slaughter.

# Appendix 1

## Questions posed to state and territory regulators

### Roles and responsibilities:

How many of the following Establishments do you have in your state?

- Knackeries
- Poultry abattoirs
- Domestic abattoirs
- Export registered abattoirs

What is the role of your agency in the regulation of these Establishments?

Are there other agencies/organisations involved in the regulation for the purposes of Animal Welfare of these Establishments and what is their role?

Which agency/s is responsible for oversight of animal welfare?

How does your agency interact with any other agencies for the regulation of animal welfare? Which agency/s is responsible for any investigation in animal welfare?

### Auditing

Do you conduct audits of each of these Establishments and if so, how frequently for:

- Knackeries
- Poultry abattoirs
- Domestic abattoirs
- Export registered abattoirs

What is the scope of each audit in terms of animal welfare? Who conducts these audits?

What minimum competencies/qualifications are your auditors required to hold? (Do these competencies include animal welfare?)

### Oversight

What level of on-site oversight (e.g. veterinary, meat inspector, authorised officer etc) is in place at each facility? (e.g. knackery, domestic abattoir, poultry abattoirs) and what is their role?

Knackery:

Role:

Domestic abattoir:

Role:

Poultry Abattoir:

Role:

### Requirements

Is there any additional regulation/requirements/codes of practices etc for *abattoirs* other than <the regulations on each jurisdiction's website> that covers:

- Company commitment
- Livestock receipt

- Provision of food and water
- Handling
- Ante-mortem inspection
- Facilities and equipment
- Stunning/Slaughter

Is there any additional regulation/requirements/codes of practices etc for *poultry processors* other than the regulations on each jurisdiction's website> that covers:

- Company commitment
- Livestock receipt
- Provision of food and water
- Handling
- Ante-mortem inspection
- Facilities and equipment
- Stunning/Slaughter

Which Australian standards, codes of practices etc are applied to the operation of *knackeries* in <state> generally, and specifically for?

- Company commitment
- Livestock receipt
- Provision of food and water
- Handling
- Ante-mortem inspection
- Facilities and equipment
- Stunning/Slaughter

## Company Competency

Are there any requirements around on-site Animal Welfare Officers?

Are there any training and/or animal welfare competency requirements for staff at Establishments? If so, for which staff and what is the required training/competency?

What are the requirements for on-site monitoring and reporting on animal welfare?

## Animal Welfare Issues

If an animal not 'fit to load' is identified at receipt:

- how is this expected to be handled by the company?
- what steps would your agency take?

If an animal welfare incident or breach is identified on site:

- how is this expected to be handled by the company?
- what steps would your agency take?

How many animal welfare incidents have occurred at each type of facility (e.g. knackery, domestic abattoir, poultry abattoir) each year for the last 5 years?

What happens if multiple breaches are identified at a facility? How many of these cases have been prosecuted?

How many of these resulted in a conviction and what was the sentence?

Are there any hurdles that make sanctions or prosecution in the case of animal welfare issues difficult?

