Animals Australia and RSPCA Australia oppose live animal export, but while it continues, our focus is to ensure that exported animals are treated as humanely as possible and, at the very least, in accordance with the Exporter Supply Chain Assurance System (ESCAS).

Animals Australia and RSPCA Australia present the following six point plan as critical measures required to address the current situation of broad non-compliance with ESCAS in Vietnam. Having examined the six point plan presented by ALEC we have no confidence that existing initiatives will address core issues that have contributed to this ongoing situation.

The current situation in Vietnam is grave and one that requires urgent and unprecedented action. Despite ESCAS, significant numbers of Australian cattle have been subjected to death by sledgehammer and exposed to ‘flooding’ over the past two years in non-approved abattoirs in Vietnam. In terms of animal suffering, both practices inflict extreme pain and trauma. Additionally, thousands of Australian cattle have been illegally trucked from Vietnam into China to face unregulated slaughter practices.

Underpinning this ongoing situation is the lack of independent oversight and a commercial climate where there is strong competition between exporters and importers for market share. Exporters have admitted broad non-compliance is occurring yet have failed to address it. In addition, it is clear that the current cattle traceability system has been corrupted, as evidenced by the illegal trade of Australian cattle into China, and cattle being slaughtered at non-approved premises in Vietnam.

This situation will clearly continue — putting further Australian exported cattle at risk of brutal treatment and, by association, the live trade to Vietnam at risk — if necessary measures to address problems are not embraced. Therefore, we believe that agreeing to this six point plan is directly in the interests of Australian exporters. The proposed measures, regardless of the requirement for further investment and additional oversight, will actively serve to reduce cruelty and the opportunity for ESCAS to be open to corruption and collusion by any party.

The measures include proactively addressing local slaughter practices, occurring both within and outside ESCAS approved abattoirs. Currently, animals from other countries are being sledgehammered to death in ESCAS-approved facilities while Australian cattle in the same facilities are required to be appropriately restrained and stunned prior to slaughter. This duality of standards is contradictory to the principle of improving in-market animal welfare outcomes and deeply distressing for most Australians. Considering the complexities in the Vietnam market it is clear that whilst the sledgehammering of local and other imported cattle continues in Vietnam, Australian cattle will continue to be at risk of enduring this same fate. Proactively addressing these practices more generally, through the provision of stunning equipment and training, is also in-line with the industry-stated position of improving animal welfare in importing countries.
In line with previous ALEC voluntary suspensions relating to Egypt, Bahrain and Pakistan when serious welfare issues were exposed, that exporters voluntarily agree to not apply for further export permits to Vietnam until ALEC can publicly declare their confidence that supply chains in Vietnam are secure. The welfare implications for Australian cattle (and buffalo) outside supply chains in Vietnam demand that no further animals be knowingly placed at risk of death by sledgehammer.

If further instances of sledgehammering, flooding or other significant abuse is detected, despite additional compliance measures taken, exporters commit to an immediate voluntary suspension of trade to Vietnam.

Currently, animals from other countries are being sledgehammered in ESCAS facilities. This not only increases the risks of such practices being inflicted on Australian cattle, but is incompatible with industry statements regarding improving welfare practices in importing countries. Exporters to immediately commit to seeking necessary agreements with abattoir owners/managers, plus providing additional stungun powerloads to cover the slaughter of cattle and buffalo from all countries.

The approval of ESCAS facilities in villages where they are surrounded by numerous traditional slaughterhouses has been predictably disastrous. It has led to numbers of Australian cattle routinely being subjected to sledgehammering practices on an ongoing basis, despite exporter awareness of this situation. Unless such supply chains are permanently closed, risks can only be reduced by Australian exporters providing equipment and ongoing training to support appropriate restraint and stunning in all facilities in such villages.

Similarly, in other locations where traditional slaughterhouses exist in close proximity to ESCAS approved facilities, such facilities be provided with appropriate equipment and ongoing training to reduce animal welfare risks.
Separately, exporters also commit to providing stunning equipment and training to non-approved abattoirs where Australian cattle have suffered death by sledgehammer, to reduce risks and as an appropriate gesture considering exporters’ stated position of improving welfare.

**Point 4: Commit to scanning of ear tags at ESCAS abattoirs post-slaughter and for this process to be captured by CCTV cameras. Associated vision to be supplied to the Department of Agriculture in conjunction with monthly reconciliation reports.**

Exporters have admitted that the traceability system is currently being corrupted in Vietnam with significant numbers of cattle leaving supply chains, whether for onward export to China or to be killed in non-approved abattoirs. CCTV covering scanning of tags at loading ramps at feedlots does not prevent tags being removed and scanned at abattoirs and animals leaving the supply chain at this point. The only way to prevent this from occurring is for tags to be scanned in the deceased animal’s ear post-slaughter and for this scanning process to be captured by CCTV. Failing to provide video evidence, of greater than 97%, RFID scanning (whilst still in the dead animals’ ear) would lead to a facility being suspended from the supply chain.

In addition to NLIS tag, all animals to be tagged with a Visual Identification Tag (VID) that identifies the exporter by tag colour as well as visually embossed details on the tag.

**Point 5: Log in details to CCTV provided to Department of Agriculture.**

Over 100 facilities (feedlots and abattoirs) will be installed with CCTV as part of the exporters’ commitment to increase oversight. With several cameras at each facility this will lead to thousands of hours of footage being captured on a daily basis with minimal likelihood of much of that vision being viewed. The prospect of a party independent of industry interests viewing CCTV vision at any time will increase chances of compliance with ESCAS.

**Point 6: Supply chain access granted on a biannual basis to a suitably qualified independent auditor appointed by RSPCA Australia and Animals Australia.**

Exporters agree to biannual random audits of facilities to be conducted by a suitably qualified and experienced auditor appointed by Animals Australia and RSPCA Australia. Access to current and historic CCTV vision should also be granted to this independent auditor. Random audit reports would be provided to ALEC and DA.

It is clear from comments in the media by exporters in recent months that the competition between a number of exporters for clients in Vietnam has led to infighting, non-cooperation, failure to report breaches, and the ongoing situation of non-compliance which has seen Australian cattle subjected to brutal practices.

Providing access to a suitably qualified expert to conduct random audits of supply chains on a biannual basis should be acceptable to exporters if they are confident that ESCAS is being complied with. Such a layer of additional independent oversight is clearly needed and warranted, and will ensure maximum motivation for compliance with ESCAS.