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SAVA STATEMENT ON THE WELFARE OF LIVESTOCK TRANSPORTED BY SEA

The South African Veterinary Association (SAVA) is a voluntary organisation representing veterinarians in South Africa. Our approximately 2100 members come from all fields within the veterinary profession and represent both clinical as well as government regulatory aspects. SAVA notes with concern the on-board welfare of live animals transported by sea for the exclusive purpose of slaughter at destination from South Africa to the Middle East. SAVA supports sustainable and profitable livestock farming, but this must happen in conjunction with positive animal welfare.

The OIE is the intergovernmental organisation responsible for improving global animal health and welfare. South Africa is a signatory to the OIE's Terrestrial Animal Health Code. Chapter 7.2 of this Code recommends how the process of live exportation should protect animal welfare. However, the OIE Code is only a set of guidelines to ensure that basic principles are taken into consideration when member countries develop and implement standards. It sets out the responsibilities of the different role players but does not enforce minimum welfare standards on board these ships. Unlike issues relating to disease, the standards or "guidelines" for welfare carry no sanction. It is also worth noting OIE guidelines are generically created and local circumstances may not be properly considered.

The OIE Code states that "welfare of the animals during their journey is the paramount consideration and is the joint responsibility of all people involved¹". It is the responsibility of the competent authority of the exporting country to establish the minimum standards for animal welfare during loading of the animals and for the duration of the journey. In South Africa, this competent authority is the Department of Agriculture, Land Reform and Rural Development (DALRRD). Both the setting and monitoring of welfare standards for live animal exports by sea are currently lacking in South Africa.

South Africa may lack the capacity for thorough regulation in some regards, however this does not mean that regulations should be ignored. The minimum animal welfare standards are legislated by the Animals Protection Act (Act 71 of 1962). The Act is legally binding and expressly states in Clause 2(m) that any person who "conveys, carries, confines... any animal... in conditions affording inadequate shelter, light or ventilation or in which such animal is excessively exposed to heat, cold, weather, sun, rain, dust, exhaust gases or noxious fumes; or without making adequate provision for suitable food, potable water and rest²", as well as any person who causes, procures or assists in the above, is liable for prosecution.

Investigations by the NSPCA, as well as reports from well-established independent bodies within the production animal industry in both South Africa and Australia (e.g. Livestock Welfare Coordinating Committee), have condemned the practices surrounding live exportation by sea. The Australian Veterinary Association has raised fundamental concerns with heat stress risk and compliance with the Australian Standards³⁻⁵ during these shipments.

Findings include:

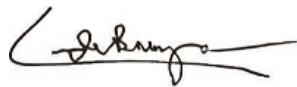
- Severe logistical challenges surrounding the transportation from production sites to the loading site leaves room for errors, such as predisposition to injury and overlooking the loading of unsuitable animals e.g. pregnant or ill animals.
- High prevalence of diarrhoea and anorexia⁶ shows that many animals do not adapt properly to the food provided on board, losing body condition and often dying during the journey.
- High stocking densities makes it impossible to properly inspect thousands of animals daily for behaviour and health problems, as is recommended by the OIE Code.
- Animals were unable to lie down to rest and cannot easily reach food and water troughs⁷. Ship movement on waves also makes sheep uncomfortable⁸.
- The double-deck design of the ship leads to faecal soiling of food and water troughs on lower levels by animals on higher levels. This contributes to reluctance to eat and the faecal-oral transmission of diseases such as salmonella⁶.
- Slippery floors and gaps between decks predispose animals to injuries.
- Build-up of waste matter combined with poor ventilation resulted in unacceptably high concentrations of ammonia in the air.
- Hot weather, high stocking density and high ammonia levels contribute to heat stress. Sheep were documented to cluster around fans with open-mouthed breathing, depressed disposition and respiratory rates faster than 100 bpm^{9,10}.

Additional independent observers should be present on board to support the existing veterinary services. Animals are recognised as sentient beings by the South African Constitutional Court and by the OIE. Currently, in South Africa as well as other countries, welfare is often erroneously measured solely by the number of mortalities during the voyage. All of the above findings are considered severe infringements on animal health and welfare and can cause extended suffering and death if not treated immediately and resolved. Animal welfare is often severely compromised long before the point of mortality, and low mortalities should not necessarily be equated with high welfare standards.

Arguments in favour of live export are commonly erroneously based on the concept that religious beliefs of the destination country demand on-site slaughter for consumption. The Muslim Judicial Council Halaal Trust (MJCHT) issued a press statement reiterating its concern for the welfare of animals, stating that the South African government “could not provide the necessary safety conditions for the animals on sea-vessels.” According to the MJCHT, animals which are not transported in good physical condition cannot be considered Halaal for slaughter¹¹. South Africa has no jurisdiction over how the animals are slaughtered at their destination. Regulations or the enforcement thereof may be minimal, leaving

animals to an uncertain and potentially inhumane fate. Slaughter must therefore be conducted at a Halaal abattoir in South Africa, where it can be properly regulated.

SAVA recognises animals as sentient beings that are capable of experiencing both positive and negative states. Fiscal interests of individual exporting stakeholders must not take precedence over the health and welfare of the animals being exported. SAVA supports calls for improved legislation protecting animal welfare within South Africa which will protect our 'Proudly South African' reputation, safeguarding the interests of all sentient beings. Until such legislation has been developed and is fully enforced, SAVA is of the opinion that as a humane alternative, sheep and other livestock destined for export for the purpose of slaughter at their destination should rather be slaughtered in South African abattoirs which comply with international religious and cultural (Halaal) regulations. Animals should be slaughtered as close to the site of production as possible, in a manner that will uphold South Africa's rightful pride in the quality of our meat.



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Addendum: Notwithstanding SAVA's above stated opinion, it is conceivable that the courts may rule in favour of the long haul export of livestock for slaughter in country of destination and/or the State may permit these shipments under certain conditions. If this is the scenario, it is imperative that these translocations are carried out with strict minimum standards in place, based on international best practice but adapted to the South African situation. SAVA, its groups and committees, are available to assist with the drawing up of guidelines to inform these standards and regulations, in order to optimise the health and welfare of the animals, should this contingency manifest.

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