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Australian Department of Agriculture, Fisheries and Forestry

Dear Mr Watt,

**URGENT Formal Complaint: The Game Meats Company, Eurobin**

1. This is an **urgent formal legal complaint** regarding the stunning, handling and slaughter practices at the abattoir operations of The Game Meats Company at 319 Hughes Ln, Eurobin VIC 3739.
2. Farm Transparency Project has captured disturbing footage taken at The Game Meats Company. The footage shows goats being hit and thrown by workers as well as goats who remain fully conscious while their throats are slit. Newborn and infant goats are also brutally killed by workers, using large electric clamps. In many cases, infant goats remain conscious after stunning, and are often left to suffer.
3. We, the authors of this footage, will make ourselves available to the regulator in order to verify the veracity of the footage and enable a full regulatory investigation to take place.
4. Among other things, the video evidence shows:
  - a. Multiple goats escaping from the stunning restraint onto the kill room floor.
  - b. Workers throwing goats into the restraint and hitting them with brooms and their hands.
  - c. Goats displaying signs of distress and fear, including refusing to move, attempting to mount each other, trying to climb the walls of the race and jumping out onto the kill room.
  - d. Goats retaining consciousness after multiple stunning attempts and having their throats slit while fully conscious.
  - e. Goats continuing to blink and lift their heads, look around and call out while hanging on the shackle line and continuing to show signs of consciousness after their throats have been cut.
  - f. Infant goats left for hours in a bucket before they are killed using large, electrified clamps.
  - g. Ineffective stunning of infant goats and partially stunned goats being left for hours in a semi-paralysed state, while they call out.

- h. Infant goats continuing to blink, shake their heads and cry out after their throats have been slit.
- 5. The severity of these breaches and their disturbing nature calls for nothing less than the immediate suspension of this slaughterhouse's license to operate while an independent investigation takes place.
- 6. DAFF sets the licensing conditions for export abattoirs, like The Game Meat company, which require abattoirs to comply with relevant Australian standards and guidelines. The Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (**AS4696:2007**) is one such standard.
- 7. The evidence described above demonstrates serious contraventions of the Section 7 (Animal Welfare) provisions of the AS4696:2007. The required outcome of Section 7 is "[t]he minimisation of the risk of injury, pain and suffering and the least practical disturbance to animals."
- 8. **Specific provisions of Section 7 relevantly provide that:**
  - a. Equipment is used in a way that minimises risk of injury, pain and suffering to animals and causes them the least practicable disturbance (S 7.1).
  - b. Animals are handled in a way that minimises risk of injury, pain and suffering to animals and causes them the least practicable disturbance (S 7.2).
  - c. Animals are slaughtered in a way that prevents unnecessary injury, pain and suffering to them and causes them the least practicable disturbance (S 7.9).
- 9. Further, the Industry Animal Welfare Standards for Livestock Processing Establishments (**AMIC Standards**) support the existing standards and guidelines relating to practices in the livestock processing industry including, which includes AS4696:2007.
- 10. Relevantly, the AMIC Standards provide that:
  - a. Infrastructure and equipment shall not cause injury, pain, suffering or distress to the animal (S 5.2.1(a)).
  - b. Livestock handling shall be undertaken in a manner that uses low stress livestock handling techniques taking into account the animal's natural behaviour (S 6.2.1(a)).
  - c. Livestock handling shall be undertaken in a manner that involves the appropriate use of handling tools (S 6.2.1(d)).
  - d. Livestock shall be restrained for stunning using a method that is designed and operated effectively for the species and type of livestock processed (S 7.1.1(a)).
  - e. Livestock shall be restrained for stunning using a method that does not involve the use of unacceptable practices and procedures, included in Annex D (S 7.1.1(c)), which includes forcing livestock to walk over the top of others (Annex D(f)).

11. The AMIC Standards represent the minimum (baseline) animal welfare standards relating to practices in abattoirs. The evidence provided in this complaint grossly falls short of even these most minimum welfare standards.
12. We raise serious concerns about the unacceptable animal cruelty involving the striking of animals, as well as the repeated, unsuccessful stunning attempts. We also raise concerns about the use of stunning equipment on infant goats and the levels of consciousness shown in both adult and infant goats post stunning and sticking.

#### A. The Video Footage

13. Below we provide private links to “compilations” of the video evidence taken at The Game Meats Company. The breaches of law demonstrated in these video links are tabled in Part B below.



The individual video evidence files will be provided to you on a physical hard drive. Please confirm the most appropriate postal address.

1. The footage was taken between the 29<sup>th</sup> of January and the 11<sup>th</sup> of April 2024 at The Game Meats Company, 319 Hughes Ln, Eurobin VIC 3739.

#### B. Itemised examples of welfare breaches

Marker name	Time	Description	Suspected regulation breaches
Race (time lapse)	00:00:00 - 00:27:03	<ul style="list-style-type: none"> <li>An unwell or injured goat being dumped next to the unloading ramp and left while they continue to move and cry out.</li> <li>An injured goat lying next to a portable knockbox while other goats continue to be unloaded.</li> <li>Unclear or delayed emergency stunning for goats unable to stand or walk.</li> </ul>	<b>AS4696</b>  (7.1)  <b>AMIC standards</b>  (S 6.2.1(a))
Restraint and stunning	00:27:15 - 04:04:22	<ul style="list-style-type: none"> <li>Goats being shoved and thrown onto the restraint.</li> <li>Goats escaping onto the killing table and into the kill room and being chased, wrestled and held down by workers.</li> <li>Ineffective stunning – electric stunner being used multiple times before leading to unconsciousness.</li> </ul>	<b>AS4696</b>  (7.1, 7.2)  <b>AMIC standards</b>  (S 5.2.1(a)), (S 6.2.1(a)), (S 6.2.1(d)), (S 7.1.1(c))

		<ul style="list-style-type: none"> <li>Goats regaining consciousness after stunning or continuing to show signs of consciousness during shackling.</li> <li>Goats piled on top of each other in the restraint exhibiting signs of fear and distress including vocalisation and attempting to escape.</li> <li>Goats bleeding from the head and body while being restrained.</li> <li>A worker hitting a goat across the face with a broom.</li> <li>Goats becoming stuck in the restraint and being forced out by workers.</li> </ul>	
Shackling, sticking, decapitation and hoof removal	04:04:23 - 07:26:05	<ul style="list-style-type: none"> <li>Goats showing clear signs of consciousness immediately before sticking including lifting their heads, calling out and blinking.</li> <li>No emergency stunning used on conscious shackled goats before sticking.</li> <li>Goats escaping onto the kill room floor and being chased and struck by workers.</li> <li>Goats showing signs of consciousness, including blinking and movement, after having been stuck and while they bleed out.</li> <li>Workers karate chopping a goat in the neck to bleed them out more quickly.</li> </ul>	<b>AS4696</b>  (7.1, 7.2, 7.9)  <b>AMIC standards</b>  (S 5.2.1(a)), (S 6.2.1(a)), (S 6.2.1(d)), (S 7.1.1(c))
Infant goat slaughter	07:26:06 - 13:57:11	<ul style="list-style-type: none"> <li>Baby goats left alone in a bucket for hours without access to food or water.</li> <li>Baby goats being stunned/killed with a pair of large electric tongs which cause them to scream in pain.</li> <li>Baby goats being lifted up by the electrified tongs and tossed into the kill room.</li> <li>A baby goat being ineffectively stunned and then left, half paralysed, for hours before a worker repeatedly attempts to stun them again and then</li> </ul>	<b>AS4696</b>  (7.1, 7.2, 7.9)  <b>AMIC standards</b>  (S 5.2.1(a)), (S 6.2.1(a)), (S 6.2.1(d)), (S 7.1.1(c))

		<p>eventually carries them into the kill room while they are still conscious.</p> <ul style="list-style-type: none"><li>• Baby goats showing signs of consciousness during and after sticking, including calling out, lifting their heads and blinking.</li></ul>	
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Sincerely,

Harley McDonald-Eckersall  
Strategy & Campaigns Director | Farm Transparency Project