

Form 59
Rule 29.02(1)

Affidavit

No. VID417 of 2024

Federal Court of Australia
District Registry: Melbourne
Division: General

Applicant The Game Meats Company of Australia Pty Ltd
ACN 095 440 823

Respondent Farm Transparency International Ltd
ACN 641 242 579

Affidavit of: **Darren Webb**
Address: c/- 319 Hughes Lane, Eurobin, Victoria
Occupation: General Manager
Date: 28 June 2024

Signed by:

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Signed by:

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Deponent

Witness

Filed on behalf of (name & role of party) Applicant
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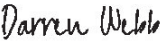
[Version 3 form approved 02/05/2019]

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I Darren Webb of c/- 319 Hughes Lane, Eurobin in the State of Victoria, General Manager, say on oath:

1. I am a witness with respect to these proceedings and I make this affidavit on behalf of the Applicant.

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2. The contents of this affidavit are true to my knowledge, unless otherwise stated, in which case they are true to the best of my information, knowledge and belief and the source of my information and belief is stated.
3. I am employed as the General Manager of the abattoir and report to the Board of Directors. I have been employed with The Game Meats Australia Company Pty Limited ("the Company") since July 2023 and have been in the position of General Manager since January this year. I am assisted by and supervise a production and sales manager, a maintenance and OH & S manager, a livestock and floor supervisor, a QA officer (quality assurance), an exports officer and work closely with the On-Plant Veterinarian ("OPV") who is present at all times that the abattoir is operational and who is independently employed by the Department of Agriculture, Fisheries and Forestry ("DAFF").
4. The daily production or processing volumes at the abattoir vary depending upon the availability of stock, the size of the stock available, the region from where the stock has been sourced and the season and weather. Generally the abattoir will process between 660 and 960 goats per day (8 hours from 6am to 2pm including breaks 5 days per week).

Standards Governing the slaughter of animals at Game Meats Company

5. The activities at the abattoir are heavily regulated and are conducted subject to and in compliance with the following public standards and regulations governing the slaughter of animals:
 - (a) Approved Arrangements with DAFF. These Approved Arrangements were previously referred to as Quarantine Approved Premises and Compliance Agreements, and are voluntary arrangements entered into with DAFF. These arrangements set out how we conduct our business in accordance with DAFF requirements and applicable standards. Exhibited to this my affidavit and marked Exhibit "DW1" is a copy of the Index of documents that the Approved Arrangements make reference to;
 - (b) The Australian Standard AS4696(2023) – Hygienic production and transportation of meat and meat products for human consumption;
 - (c) The Aus-Meat : Meat Industry Standards as they apply from time-to-time;

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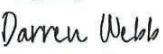
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- (d) The Halal Certification Authority standards/requirements as they apply from time-to-time;
- (e) The requirements which any importing country for our meat or meat products may have from time-to-time (set out in the Manual of Importing Country Requirements ("MICOR"));
- (f) The requirements of the Export Control Act 2020 (C'Vealth);
- (g) The requirements of the Australian Meat and Livestock Industry Act 1997 (C'Vealth); and
- (h) The conditions that apply from time to time with respect to our Licence to Operate a Meat Processing Facility under the Meat Industry Act 1993;
- (i) The Agriculture Victoria Code of Accepted Farming Practice for the Welfare of Goats; and
- (j) The Meat Industry Act 1993 (Victoria).

Plant and Equipment

6. The following is a list of the primary pieces of plant and equipment which are employed in the abattoir as part of the slaughter process:
- (a) A Restrain Conveyor which is a belt driven adjustable V-restraint system;
 - (b) Jarvis Jass 1 electric stunner (constant amperage electric stunner);
 - (c) Thornton small stock stunner (electric stunner – back up unit);
 - (d) Jarvis head cutters; and
 - (e) Freund electric tong stunner.
7. The stunning equipment items are used by the stunners in the slaughter of the goats. They are trained progressively on the use of the equipment within the abattoir and firstly will read through the relevant work instruction with the QA officer and they then buddy with an experienced employee until that employee considers them competent. They are then assessed by the QA officer and once signed off by him commence working independently. Initially when working unsupervised they are more closely monitored to ensure that they are undertaking the task correctly. Like most practical skills the longer they are undertaken the better the employee gets. It is really about time and experience.


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Health and Biosecurity Measures

8. The abattoir employs and maintains the following health and biosecurity measures, to protect personnel and visitors to the abattoir, the business itself, the community and the wider industry:
 - (a) Perimeter fencing;
 - (b) Sliding electric security gate;
 - (c) Warning signage;
 - (d) Security camera and alarm systems;
 - (e) Visitor and contractor sign-in register and requirements;
 - (f) Hygiene and sanitation procedures; and
 - (g) Exotic animal disease procedures.
9. Upon entry to the abattoir staff or visitors are provided access to change rooms to change into the required protective equipment including hair and beard nets, nitrile gloves, plastic aprons, masks and hand and boot wash facilities.
10. Further the abattoir is divided into "dirty" and "clean" sides to mitigate contamination. Microbiological testing is conducted approximately five (5) times per week (the number of times testing is undertaken depends on the carcass numbers processed through the abattoir) and this testing is then forwarded to a NATA accredited testing facility for further testing and the results monitored.
11. The biosecurity measures, if breached, place the community and industry at risk of disease outbreaks that can be transported by contaminated vehicles, boots and equipment from other locations where disease may be present. QFever could be contracted by unvaccinated people entering the abattoir in circumstances where the personal protective equipment and processes have not been followed.
12. The gates to the premises contain warning signs with respect to these biosecurity risks. Exhibited to this my affidavit at "DW2" are photographs of the disease warning signs on the front gate of the premises.
13. An important part of our health and biosecurity measures is that we know the identity of the people who seek to come onto our premises and any risk that may entail. Such people who come onto our premises for example are transport drivers, and farmers who supply goats. Because we know who they are we are able to track where they have

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been. This is important to enable recall and traceability of product if there is an outbreak at our abattoir. It also enables measures to be taken if a disease outbreak arises from a supplier or a transport driver has been exposed to a diseased area. Unidentified trespassers whose origin we don't know pose a serious biosecurity risk. This is especially the case if the trespassers may have visited other farms or abattoirs where there may be disease.

Abattoir Employees

14. Our employees are sourced from various places including locally by word of mouth, referrals from previous employees, advertisements placed on job search sites like SEEK and through a labour hire company. Employees are also secured through the Pacific Australia Labour Mobility scheme ("PALM") and other foreign work employment schemes to bring in overseas workers as determined by the Government from time-to-time.
15. Unskilled new employees who commence working with us start at the entry level as per the Meat Industry Award 2020 and are trained through a mixture of:
 - (a) learning the relevant procedures and tasks undertaken in the process of meat production at the abattoir, which are set out in the applicable work instructions and standard operating procedure manual (which cover the tasks of stunning and sticking the animals which are being slaughtered),
 - (b) practical on-the-job training with mentoring from skilled and trained staff, who demonstrate the tasks to be undertaken these roles and then direct and supervise the new employees undertaking these various tasks, until such time as these employees have been determined by the Company's QA Manager to be competent for the undertaking of their position.

Exhibited to this my affidavit at ""DW3" are the primary work instructions and operations manual sections relevant to and which address the following tasks:

- (a) Reception of animals at the abattoir;
 - (b) Selection and preparation of animals for slaughter; and
 - (c) Stunning and sticking the animals ;and
 - (d) Animal welfare/Humane treatment of animals in the production process.
16. Skilled employees who join the Company are also required to acquaint themselves with the various work instructions and standard operating procedure manuals, applicable to

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their position/level and are assessed by trained staff observing how they undertake the various tasks required to be performed in their position, before these employees are deemed to have met the required competency level in their new roles. If an employee is deemed to have not reached that level of competency by the Company's QA Manager, then they receive further on-the-job training and mentoring from experienced employees to meet the skill and knowledge requirements for their intended position/level.

17. To illustrate the flow of animals through the abattoir for processing exhibited to this my affidavit at "**DW4**" are copies of the Process Flow Charts for the Slaughter and Dressing of Deer/Lamb/Goats, the Process Flow Chart for Skin Off Slaughter and Dressing of Deer/Lamb/Goat and the Process Flow Chart for Skin On Goat Slaughter and Dressing.

DAFF Supervision and Abattoir Operations and Controls

18. The OPV who is employed by DAFF is on site daily for the full production run conducted by the abattoir, is unrestricted in his movement around the premises and:
- (a) Conducts antemortem and postmortem examinations and verification of the process being followed in the processing of animals;
 - (b) Conducts animal welfare checks;
 - (c) Conducts weekly management meetings with the key management employees at the abattoir";
 - (d) Conducts/ weekly verification of the stun/stick process being implemented at the abattoir;
 - (e) Conducts daily verification of the slaughter floor process;
 - (f) Conducts primary meat inspection;
 - (g) Can undertake inspection of records or documents relating to the animal processing process implemented by the abattoir;
 - (h) verifies the meat hygiene assessment records maintained by the abattoir; and
 - (i) Identifies, notes and records any non-compliance events, incident reports and corrective action requests as a result of any significant non-compliance with the relevant requirements of the operation of the abattoir.
19. The OPV conducts a visual inspection and assessment of livestock in the morning prior to production for the day commencing. Production will commence once the OPV has determined that the animals are in a healthy condition to be slaughtered. The OPV

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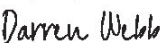
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inspects all of the different aspects of the production process each day, as production is being carried out. The OPV produces the weekly meeting agenda and conducts the meeting to discuss the agenda and operation of the abattoir. The meeting covers such matters as staff performance, work, place health and safety and animal welfare and identifies any issues noted by the OPV for that week.

If employees identify an animal welfare issue they are expected to report the issue to management. I have never had an animal welfare issue or concern reported to me by any employee at the abattoir.

The abattoir has Standard Operation Procedures ("SOPs"), Work Instructions ("WIs") and Risk Assessments ("RA") for each part of the QA program which is monitored by the QA Manager.

20. The required standards are maintained through the Company's QA program which has been implemented by the abattoir in alignment with our regulatory and licence requirements and obligations. The QA program allows for the identification of issues which may relate to staffing, training gaps, the equipment utilised in the processing of goats, the process applied to the processing of the goats and any procedural requirements which may need adjustment based upon any identified issues. The QA Program is the program used to monitor compliance with the whole of the processes in the operation of the abattoir which runs from collection of the animals to the export of product. The parts which require daily attention are signed off on a daily basis by the QA Manager, David Rowe and the record retained. The QA Manager notes any issues or non-compliance with the QA Program to me.
21. The abattoir is subject to external audits, in addition to the daily supervision by the OPV, as follows:
 - (a) DAFF – biannually;
 - (b) Aus-Meat – quarterly; and
 - (c) Halal Certification Authority – quarterly.
22. The Company has never received an unsatisfactory or unacceptable result from any of these audits.
23. Through the period from 1 January 2024 to 21 May 2024 the operations of the abattoir have been and were monitored by the QA Manager undertaking monitoring and verification during the production runs of the abattoir, the ongoing daily presence and supervision of the DAFF OPV and the continual external program referred to earlier in

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this affidavit. The QA Manager moves through the abattoir and checks each section or part of the process. He has a checklist that he completes for each part of the abattoir he monitors. Exhibited to this my affidavit at exhibit "DW5" is a copy of an example of the daily documents completed by the QA Manager dated 20 June 2024.

24. On and from 6 May 2024 I:

- (a) halted production of the abattoir after holding a management meeting and called a toolbox meeting at 6am with all staff and informed them of issues that had been raised in the DAFF complaint. ;
- (b) took all of the employees who were depicted in the footage aside, told them that they were in the footage and watched it with them.
- (c) removed those employees from their roles who did not properly perform their roles as they should have, such as Moses Saresarevata (stunner) and Yazan Al-Masri (Halal sticker). Mohammed Hakik (Halal sticker), Jiojo Bakoso(stunner) and Matthew Maguire (stunner) were also reallocated to alternate roles in other sections of the abattoir to receive additional training.
- (d) retrained these employees and reinducted them with respect to the various tasks required to be performed in the abattoir. The training took a number of weeks and was completed in accordance with the SOPs and was conducted as if they were new employees of the company.
- (e) liaised with the OPV with respect to the remedial action being undertaken and any identified issues or concerns from the perspective of the OPV. The OPV commenced additional monitoring and verification checks of the stun/stick part of the process.
- (f) reviewed the SOP's and Wis' for the abattoir. Exhibited to this and marked "DW6" is a copy of the SOPs and WIs which were amended as a result of the review undertaken. The amendments involved refining some processes to provide more context for the process being undertaken and split some processes down into separate documents. For example, prior to the review the SOP's did not address the stunning of infant goats separately and following the review the company created a separate SOP for the stunning of infant goats.

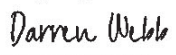

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- (g) installed an additional employee at the restrainer to control and mitigate the unusual event of there being non-compliance with the production processes by having a goat escape into the kill floor area.
- (h) installed further video surveillance above the stunning station for enhanced monitoring and verification processes which feeds live images of the production process to video monitors located in the production manager's office which are then also recorded to a hard drive, so that management is able to oversee the production process from time to time to ensure that the tasks undertaken during production by the Company's employees are being properly done.
- (i) trialled process changes to the stun/stick process to ensure that the time between those steps remains well inside the regulatory requirements. The average time between stun and stick is now 7-8 seconds compared with the Australian standard of 25-30 seconds. The average time between stun and stick prior to the changes was approximately 10 seconds. Daily records are maintained now by the OPV and the OPV now periodically monitors these processes as part of the increased verification of processes being undertaken by the OPV.
- (j) increased stunning amperages above the minimum level required to mitigate the prospect of an animal regaining consciousness. The minimum level required by [describe the applicable Australian regulation/standard] is 1 amp. At the time of the captured images we operated at 1.2-1.3 amps. Now the stunner runs at 1.5 amps so it was always compliant in terms of the amps used but the increase is to mitigate the risk of any animal regaining consciousness.;
- (k) introduced two (2) new Power Actuated Systems (PAS) captive bolt units to replace older units and to be used where quicker emergency slaughter is required. The old system was serviceable but it used a percussion stunner. A percussion stunner is a mushroom head device which depresses the skull of the animal. The captive bolt uses a .22 shell and drives a 125mm shaft into the brain of the goat. It is more effective than a percussion stunner but not used in general (even though more effective) as the Halal requirement is that the animal is alive when it is stuck and if the captive bolt unit is used the animal is already dead;
- (l) prepared a corrective action plan to address any issues that were identified in the complaint to DAFF. This corrective action plan was not required to be submitted to DAFF however through my discussions with the OPV he was aware of the

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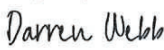
steps which were proposed. Exhibited to this my affidavit at "DW7" is a copy of the corrective action plan prepared in response to the complaint to DAFF.

Approach to Animal Cruelty

25. The Company has a zero tolerance approach towards animal cruelty and there is no acceptance of any level of animal abuse. If a situation involving animal cruelty is identified then it is resolved through the company regulatory and disciplinary processes and policies. Exhibited to this my affidavit at Exhibit "DW8" is a true copy of the Company's Employee Handbook which includes its disciplinary procedures. . Until 6 May 2024, there never has been a need to apply this policy against any of the Company's employees. After 6 May 2024 when the Company discovered the footage, the Company's Employee Handbook which includes its disciplinary and regulatory procedures was applied against the employees listed below:
- (a) Mosese Saesarevata for not correctly performing the task he was required to carry out in the production process (stunning) and not immediately informing management of the departure from the production process. As a consequence Mosese Saesarevata was moved to another section of the abattoir that did not involve the stunning of goats and underwent retraining in the stunning role; and
- . (b) Yazan Al-Masri for not correctly performing the task he was required to carry out in the production process (sticking) and not immediately informing management of the departure from the production process. As a consequence Yazan Al-Masri was moved to another section of the abattoir that did not involve the sticking of goats and underwent retraining in the sticking role.
26. Other than the isolated examples contained in the footage which has been provided to DAFF by the Respondent, at no time have I witnessed, identified or had brought to my attention any instance of goats escaping the retainer and being slaughtered while conscious or any animal abuse or cruelty as a result of a failure of employee to follow the mandated systems and processes of the company. If I had witnessed any such other incidents I would have taken remedial action immediately such as the remedial action I took after observing the footage in the DAFF complaint.

FTI trespasses

27. Between 8 January 2024 and 13 April 2024, FTI or persons known to and acting on behalf of the FTI broke into and entered the abattoir. I have viewed CCTV camera

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footage taken by security cameras at the abattoir and seen that FTI or persons known to and acting on behalf of the respondent entered the abattoir on these occasions:

- (a) 9 January 2024, between 00:13 and 02:30 (3 persons)
- (b) 27 January 2024, between 00:06 and 03:13 (2 persons)
- (c) 3 February 2024, between 00:12 and 03:03 (3 persons)
- (d) 17/18 February 2024, between 22:55 and 00:01 (2 persons)
- (e) 2 April 2024, between 00:37 and 02:22 (3 persons)
- (f) 7 April 2024, between 00:55 and 01:40 (2 persons) and
- (g) 13 April 2024, between 00:11 and 01:22 (2 persons).


Exhibited to this my affidavit at Exhibit "DW9" are video excerpts of the CCTV footage taken from security cameras at the abattoir showing FTI's entry to the property on those occasions. The videos can be accessed via:

<https://www.dropbox.com/scl/fo/jrel4e3jvwnt7vyvky230/AHehCDrzQOznuiN7Zi0VYhs?rlk=ey=jcovc1gkepxxebnhaud6hni91&dl=0>

28. FTI installed hidden cameras in or near the slaughter area and the abattoir on all or some of the occasions they were seen on the abattoir CCTV footage to have entered the property and detailed paragraph 4 of this affidavit. Exhibited to this my affidavit at exhibit DW-5 are pictures showing where holes were drilled by the FTI, or persons known to and acting on behalf of the FTI, for the installation of the hidden cameras by the FTI.

Impact

29. The trespasses and subsequent publication on the FTI website have already had a significant impact on the business of the Company. In particular I have observed heightened anxiety of the workers at the abattoir. Matthew Maguire (a local farmer who is deaf and supplements his income working at the abattoir as a stunner) has informed me that he no longer has the confidence to undertake this role because he has become anxious and concerned about performing that function. There has been negative commentary made on the company Facebook Page. Exhibited to this my affidavit at exhibit "DW10" is a true and correct copy of the posts made to the Facebook page of the Company as at 24 June 2024. Mosese Saesarevata (a stunner) while he was prepared to return to work in the role of a stunner and did so briefly, after some


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persuasion to deal with his concern and anxiety about working in that role again, has been subsequently been hospitalised for treatment following his diagnosis of leukemia. For a period of three weeks after 17 May 2024 I observed Rick Cavedon, Production Manager suffering from stress and anxiety, by reason of his concern about allegations being made against him as a result of what is captured on the footage and his concerns for the future of the business.

30. Since the publications of the captured images on the FTI website Rick Cavedon and myself have received disgusting and abusive phone messages from unidentified callers as detailed in Exhibit "DW11" which is an email from myself dated 21 June 2024 to Eugene Tomasoni about the calls. Until then neither Rick nor me, or as far as I'm aware, anyone else from the Company had ever received abusive calls of this kind.
31. On 27 June 2024 I received correspondence through the mail at the abattoir, addressed to me as The Manager which suggested that I, amongst other things, engaged in torture and cruelty to animals. The letter also included the comment that "You must be shut down", the comment that "I will be sharing on Facebook and other media outlets so you lot are exposed for what you are" and the comment "Hope you get to suffer like these poor animals have. Karma is coming your way". The abuse I have received has also caused me stress and anxiety. Exhibited to this my affidavit and marked "DW12" is a true and correct copy of the letter received at the abattoir on 27 June 2024.
32. Many of our employees, including members of the management team live locally and since 17 May 2024 have reported to me and Company management comments outside of work and in social media settings that denigrate the Company or them as a result of their employment with the Company. The Company has had to reassign employees such as Mathew Maguire into different roles to accommodate concerns of employees fulfilling the stunning and sticking job as part of the production process featured on the images captured by FTI. .
33. Further, the management team of the Company have been placed under significant pressure to ensure that production is able to efficiently and effectively continue, at a time when the Company is now confronted with staff shortages at greater levels than normal, while being faced with the prospect of widespread further publication of the captured images. These increased staff shortages are a direct consequence of employees feeling upset, stressed and anxious about FTI's activities and publications and the prospect of there being further publication of images and unfair and inaccurate commentary that they are engaging in animal cruelty in the course of their occupation (at a time when it is

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already difficult to attract and recruit employees for these roles). Such anxiety and stress amongst these employees is resulting in these employees being less productive and taking time off work as sick leave.

34. .Since the discovery of the trespass and the footage, I have observed that many of the Company's employees now also have reduced morale and motivation in their roles. The level of enthusiasm for their work is lower than it was before the trespass and the publication of the captured images on the FTI website. It is now more difficult to have staff change roles (for example to move someone from sticking through to the role of dunking carcasses in the de-hairing bath to provide a break from the more difficult tasks) and to keep the employees fresh, motivated and productive. As a result the Company is left short staffed in these operational roles within the abattoir, which has resulted in reduced production.
35. Further publication of the captured images as proposed by FTI will further significantly impact upon the employees of the Company and the recruitment and retention of employees. Such further publication will cause a further significant reduction in the motivation, engagement, morale and productivity thereby impacting upon the efficiency and financial viability of the Company. Recruitment of new employees will also be impacted by the hostility that will be created towards the Company by some parts of the local community towards the Company and employees of the Company.
36. On 14 May 2024 I received an email from Jason Olington the DAFF Area Technical Manager advising that sometime before 17 May 2024, FTI had provided edited extracts of the captured images to Seven Network's Albury-Wodonga newsroom (Seven Network). McDonald -Eckersall then participated in the media story broadcast by the Seven Network on 17 May 2024 about the video and FTI's entry into the abattoir. Exhibited to this my affidavit at exhibit "DW13" is a true and correct copy of the email received from Jason Olington and dated 14 May 2024.
37. My concerns about the effect of the further widespread publication of the captured images by FTI was fortified by a conversation I had on 27 June 2024, with the plant manager at Ralphs Meat Company, Tristan Wallace about the effect of such FTI publications on the business of Ralphs Meat Company. Mr Wallace advised me during that conversation, that as a result of the widespread publication of footage obtained by FTI from their meat processing facility that they experienced a resulting:

- Increased employee absenteeism;

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- Reluctance of staff to work under increased internal CCTV monitoring of their work conduct;
- An increase in the stress/pressure levels of management at the abattoir (including himself);
- The loss of a local contract for the sale of meat products produced;
- The erection of posters around their local area of operation which contained a QR code;
- The abuse of members of staff when they were out in public on account of their association with us as their employer;
- A decline in production due to a decline in staff morale and sentiment about the work they perform;
- The exiting of skilled and experienced employees from the abattoir;
- The receipt of abusive/threatening emails directed toward the company owners; and
- Adverse posts being placed on the social media platforms including google reviews.


DAFF Complaint

38. I have read the complaint that was submitted to DAFF and viewed the associated footage which has been provided as part of that complaint noting that the footage supplied to DAFF by FTI is a "compilation" of the video evidence taken by FTI. It is hard to make a proper assessment of what is contained in the video compilation footage as it doesn't show the lead-up to the footage that has been supplied to DAFF. With respect to the items raised in the complaint to DAFF, and using their headings, I say as follows:

(a) Race

In my view this process was not handled correctly however I note that the conduct was not undertaken by an employee of the company but by a transport driver who was delivering stock to the abattoir. It appears to me that this occurred prior to the unloading of the goats to be delivered and it also appears that the goat was being removed from harms way, prior to the unloading of the goats, to avoid the goat being injured or trampled when the goats were unloaded. It is not uncommon for a goat to be weary following transport and then quickly recover and hop up once it is provided an opportunity to recover. My view about what has occurred here is limited by the limited footage which has been provided by FTI and upon viewing of the entirety of the footage I would be in a better position to comment further on what appears to have occurred.

(b) Restraint and Stunning

Signed by:

86A3C376A915418...
Deponent

Signed by:

8CB8D95E49A7410...
Witness

In my experience goats can stand on near vertical surfaces if they are able to get even a toehold onto something that allows them to generate leverage. This can occur with the leverage being provided by a goat in front of the goat which jumps. Stunning aspects of the footage depicted at first blush appear that there are items of non-compliance with the training received by the employees and the relevant SOPs and WIs. Given the limited nature of the footage provided by FTI it is difficult to comment further, upon receipt of the entirety of the footage I would be in a better position to comment further on what appears to have occurred.


(c) Shackling, sticking, decapitation and hoof removal

Again, having reviewed this aspect of the footage depicted it appears that there are items of non-compliance with the training received by the employees and the relevant SOPs and WIs. It is difficult to say that what is depicted is a result of an ineffective stun or a delay to the sticking aspect of the process and I would need the entirety of the footage in order to be able to comment further and sensibly as to the cause of the images depicted.

It was from watching this footage that I formed the view I did which prompted the disciplinary action which was taken with respect to those employees and outlined earlier in this my affidavit

(d) Infant goat slaughter

I have also viewed this footage and disagree with the contents of the complaint although again access to the entirety of the footage would allow for a more informed view about what has occurred. Goats the age of those depicted in the footage do not require access to food or water as at their stage of life they suckle from their mother for sustenance. Further, the stunner depicted in the footage has an indicator light that lights up when there has been an effective stun, it is an amber/yellow light. A completed circuit must be made for a stun to be administered to the goat. In the footage the stunner is checking the stunner as without a complete circuit being formed there is no stun or partial stun. My review of the footage suggests that any discomfort experienced by the goat is related to the tongs themselves rather than the goat being partially stunned. Since reviewing the footage we have ground down the grip points on this tong stunner so that the infant goats can be secured in a more effective manner for the delivery of the stunning charge with the use of less force to secure the infant goat.

Signed by:

6CA2C376A916448...
Deponent

Signed by:

8CB8D95E40A7410...
Witness

Sworn / Affirmed by the deponent
at Eurobin
in Victoria
on 28 June 2024
Before me:

Signed by:

Chris Neville

8CB8D95E49A7410...

Signature of witness

[Name and qualification of witness]

Christopher Hyatt Neville
Solicitor

[* Delete if inapplicable]

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)
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Signed by:

Darren Webb

6CA3C376A915418...

Signature of deponent

Signed by:

Darren Webb

6CA3C376A915418...

Deponent

Signed by:

Chris Neville

8CB8D95E49A7410...

Witness