Independent Review into the Livestock Export Trade

Submission by Compassion in World Farming

Compassion in World Farming welcomes the opportunity to make a submission to the Independent Review into the Livestock Export Trade.

Australia’s live export trade has persisted for many years despite compelling evidence being presented on a regular basis to the Australian authorities and the bodies responsible for the trade of the serious welfare problems faced by Australian animals during the lengthy sea journeys and then during onward transportation and slaughter in the destination country.

In light of the suffering that is inherent in the protracted journeys and the intractable nature of the problems of cruel handling and slaughter in the importing countries, Compassion in World Farming believes that the live trade must now be brought to an end and replaced by a carcase trade.

Even if welfare problems in the importing countries could eventually be addressed, the prolonged journeys to the importing countries, particularly those of the Middle East and North Africa, make the live export trade completely unacceptable. Even before the sea journey begins animals may undergo a long journey to the port of departure as well as unloading from the truck and loading on to the ship both of which procedures are stressful for animals that are largely unused to being handled by humans.

Once on the ship, the animals are often transported in overcrowded conditions and at certain times of year temperature and humidity are high and ventilation may be inadequate. A proportion of the sheep die en route from inanition (failure of grazing animals to adjust to the pellet food provided on the ship), disease and injury. The mortality rate is, however, only the tip of the iceberg. Many sheep who survive nonetheless suffer greatly from injury and disease, for example eye infections and even blindness, as well as from hunger, thirst, heat and exhaustion. Some cattle transported by sea to South East Asia die during the journey
due to cyclones and heavy seas, one of the worst instances totalling 301 and another 68 cattle.¹

These long journeys are incompatible with the widely accepted principle that animals should be slaughtered as near as possible to the farm of rearing with long distance trade being in the form of meat and carcases. Indeed, Article 7.2.1 of the recommendations of the World Organisation for Animal Health (OIE) on the transport of animals by sea states that “The amount of time animals spend on a journey should be kept to the minimum”. The Federation of Veterinarians of Europe states “Animals should be reared as close as possible to the premises on which they are born and slaughtered as close as possible to the point of production”.²

**Consistency of the treatment of Australian animals in importing countries with the recommendations of the World Organisation for Animal Health**

Reports, both written and filmed, by Animals Australia have repeatedly demonstrated that after arrival in countries in the Middle East Australian animals are subject to treatment that fails to comply with the recommendations of the World Organisation for Animal Health (OIE) on the (i) transport of animals by road and (ii) slaughter of animals for human consumption.

We set out below in Annexes I and II detailed analyses carried out by Compassion in World Farming’s Chief Policy Advisor Peter Stevenson, who is a solicitor, of the contraventions of the OIE recommendations on transport and slaughter that were revealed in reports by Animals Australia of their investigations:

- in December 2006 in Egypt: see Annex I
- in September 2007 in Jordan, the United Arab Emirates, Kuwait and Oman: see Annex II.

Recent investigations by Animals Australia in 2009 and 2010 show that contraventions of the OIE recommendations similar to those detailed in Annexes I and II continue to take place on a regular basis in the countries of the Middle East.

In 2011 Animals Australia carried out an investigation into the slaughter of cattle in Indonesia. A report by RSPCA Australia analysed the findings of the investigation and provided a detailed assessment of the widespread breaches that were observed of the OIE recommendations on slaughter; see in particular Table 8 of the report. The RSPCA Australia report concludes that “Handling across all locations breached multiple clauses of the OIE Code”.

It is ethically unacceptable for Australia to send animals to countries where it knows full well that they will be handled and slaughtered in ways that are inconsistent with the OIE recommendations.


The need for stunning

The OIE recommendations provide only minimum standards. Australia should aspire to higher standards to safeguard the welfare of the animals that it exports. In particular we urge Australia to insist on standards that are properly based on scientific evidence regarding the anatomy and physiology of animals.

The OIE recommendations do not require animals to be stunned before slaughter. Scientific research shows that animals that are not stunned experience severe pain at throat cutting and that there is a prolonged period between throat cutting and loss of brain responsiveness during which animals can suffer extreme pain and distress. Our concerns are supported by a Scientific Report and a Scientific Opinion by the European Food Safety Authority (EFSA) which is responsible in the European Union for reviewing the scientific literature on animal welfare. These, together with the report of the UK Farm Animal Welfare Council referred to below, base their conclusions on a review of the extensive scientific literature in this field.

The EFSA Opinion concludes that “due to the serious animal welfare concerns associated with slaughter without stunning, pre-cut stunning should always be performed”.

The EFSA Report states that there is a high risk that animals feel extreme pain during the cutting of the throat. The Report adds that during the period when the animal, whose throat has been cut, is still conscious, serious welfare problems are highly likely to occur since the animal can feel anxiety, pain, distress and other suffering.

The EFSA Opinion concludes that “cuts which are used in order that rapid bleeding occurs involve substantial tissue damage in areas well supplied with pain receptors. The rapid decrease in blood pressure which follows the blood loss is readily detected by the conscious animal and elicits fear and panic. Poor welfare also results when conscious animals inhale blood because of bleeding into the trachea. Without stunning, the time between cutting through the major blood vessels and insensibility, as deduced from behavioural and brain response, is up to 20 seconds in sheep ... up to 2 minutes in cattle”.

The UK Farm Animal Welfare Council report on the slaughter of red meat animals is also critical of religious slaughter. It states: “When a very large transverse incision is made across the neck a number of vital tissues are transected including: skin, muscle, trachea, oesophagus, carotid arteries, jugular veins, major nerve trunks (e.g. vagus and phrenic nerves) plus numerous minor nerves. Such a drastic cut will inevitably trigger a barrage of sensory information to the brain in a sensible (conscious) animal. We are persuaded that such a massive injury would result in very significant pain and distress in the period before insensibility supervenes.”

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In light of the above evidence Australia should insist on its animals being stunned before slaughter. In addition it should require cattle to be stunned in an upright position and to be restrained for stunning in a well-designed and well-maintained stunning box or conveyor restrainer system. Advice on such boxes and systems by Professor Temple Grandin, widely acknowledged as a leading expert on welfare at slaughter, can be found at http://www.grandin.com/humane/restrain.slaughter.html

**Australia’s international reputation**

Australia’s insistence on continuing to export live animals despite overwhelming evidence of suffering has over the years resulted in considerable damage to Australia’s reputation. Australia’s live trade is widely considered to be the world’s worst in terms of the number of animals involved, the length of the journeys and the cruel slaughter methods imposed on the animals at journey’s end.

Australia’s decision in June to end live cattle export to Indonesia was warmly welcomed but its new decision to allow the trade to resume - despite there being no evidence of welfare improvements in Indonesian abattoirs - has re-established Australia’s reputation as a country that is prepared to ignore the most flagrant of welfare abuses. This tarnished reputation could undermine Australia’s valuable export trade in meat and meat products as importers may lose faith in Australia’s integrity and the quality of its products.

**Economic implications of ending live exports**

Compassion in World Farming recognises the serious economic difficulties experienced by Australia’s cattle farmers when the live trade to Indonesia was ended. However, the answer is not to re-open the live trade which is inherently inhumane but rather to prepare a coherent strategy for an economically viable future without live exports.

Australia’s meat exports of beef, mutton and lamb were worth $6.29 billion in 2008 while live exports of cattle and sheep were worth much less, just $0.959 billion. Clearly the prosperity of the livestock sector is much more rooted in meat exports than in the live trade.

A positive approach is exemplified by Queensland’s decision to test the commercial viability of establishing “strategically located” plants in the northern cattle country to slaughter and dress beef for market. Indeed there are strong indications that a shift from live to meat exports would benefit Australia economically. In 2010 a report commissioned by Australia’s leading meat processors concluded that live exports to Indonesia are undermining Queensland’s beef processing industry. The export of live cattle takes with it economic activity and jobs in Australia’s meat processing sector.

Similarly a review into the live sheep trade found that phasing out live sheep exports would have a minimal impact on farmers and would in fact reap long-term benefits for farmers and the economy through increased processing in Australia. The Australian Meat Industry

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Employee Union estimates that the live trade has exported 40,000 Australian jobs since 1990.

**Monitoring of export consignments and animal welfare standards to the point of slaughter and actions to improve animal welfare outcomes in live export market countries**

Although the Federal Department of Agriculture, Fisheries and Forestry (DAFF) is responsible for Australia’s agricultural sector at a national level including the regulation of livestock exports via the Australian Quarantine Inspection Service (AQIS), once shipments have left Australia monitoring and reporting of all stages of the export process, including welfare at slaughter, is in the hands of industry. This system removes objectivity and provides Industry with an incentive not to highlight negative events, although accredited veterinarians who accompany consignments during the sea journey must report to AQIS. The resumption of trade to Indonesia following suspension of the trade from June 7 to July 6 2011 provided an opportunity to redress this anomaly but essentially the system remains unchanged with Industry responsible for required auditing of the supply chain.

Reports of cruelty to Australian sheep and cattle in receiving countries have come to public notice as a result of investigations by animal protection organisations, notably Animals Australia sometimes in conjunction with others (Compassion in World Farming, PETA).

Examples include: Indonesia (March 2011), Kuwait – Festival of Sacrifice (November 2010), Middle East – various (December 2009), Bahrain, UAE, Jordan (December 2007), UAE, Kuwait, Oman, Jordan (September 2007), Egypt (December 2006), Bahrain, Kuwait, Egypt, Jordan (December 2005/January 2006), Kuwait (November 2003).

**Middle East/North Africa**

As a result of these investigations some action has been taken by the Australian Government and/or Industry to avoid the obvious cruelty. However, these do not generally appear to have led to any real improvements and we have concerns that changes that do occur are often not long-lasting. Examples:

a) Investigation in Kuwait in 2003 identified brutal behaviour towards sheep by staff in Shuwaikh municipal slaughterhouse. This evidence was revealed by 60Minutes in March 2004. Meat and Livestock Australia (MLA) immediately announced a 4-day animal-handling workshop in Kuwait; MLA’s Annual Report 2003-2004 announced that it had developed an ‘animal handling education package’ for the Middle East. Yet when Animals Australia returned to Kuwait in 2006 neither conditions for the animals nor the behaviour of abattoir staff had changed.

b) In December 2007 Animals Australia visited Bahrain. MLA has a Middle East base in Bahrain, has conducted training courses and the Australian Veterinary Counsel is based in Dubai. Yet animals were filmed with legs trussed, being dragged across

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8 Details via www.animalsaustralia.org
streets, stuffed and thrown into cars/boots, tossed over railings into the back of trucks and cruelly slaughtered in abattoirs and on streets while fully conscious.\textsuperscript{11}

c) Footage obtained by Animals Australia in Bahrain in 2007 forced the Bahraini Government to react and prohibit the carrying of Australian animals in car boots from the Bahrain feedlot. MLA/LiveCorp subsequently lauded the success of their ‘in the Ute, not the boot’ initiative.\textsuperscript{12} Animals Australia subsequently found sheep being transported in small trucks from the feedlot to markets where purchasers then stuffed the animals into car boots.

d) Following investigation in Egypt in Jan 2006, cattle exports were suspended in February 2006 and only resumed in May 2009 following construction of “a state-of-the-art feedlot and abattoir and iron-clad assurances” that animals would be well-treated.\textsuperscript{13} According to MLA trade suspension was due to “documented evidence of atrocious handling conditions”. Animals Australia’s documentation of its own hard-won evidence brought about the suspension yet Industry - who one must assume would have had the opportunity to identify similar evidence – had neither made it known nor taken effective action.

e) Sheep exports to Egypt have not resumed following documented evidence by Animals Australia of cruel treatment of Australian sheep during the Festival of Sacrifice in Dec 2006. Evidence of cruelty in and surrounding open markets was easily obtained. Industry must have been aware of this for many years but chose to ignore it.

**Indonesia**

Most recently cattle exports to Indonesia were suspended for a month following revelations by Animals Australia of extremely cruel slaughter methods. Industry claimed, variously, not to have known of the cruelty, or not to have known its extent. Implicated in the cruelty were Mark I restraint boxes commissioned and installed by MLA.

Contrary to claims of ignorance MLA’s Annual Report 2005-2006 states that 69 abattoirs in Indonesia slaughtered Australian cattle; 38 of them were visited, reported upon and recommendations were made. Six restraining boxes were installed and a DVD in the Indonesian language produced showing how to use the box and gain benefits.\textsuperscript{14}

The Live Trade Animal Welfare Partnership (LTAWP) initiative between government and the live export industry, designed to provide funding for projects in the Middle East and South East Asia to improve animal welfare and support trade in these markets, was announced in the 2009-2010 budget.\textsuperscript{15}

Projects supported to date have focused on enabling better animal welfare outcomes in the handling, transport and processing of live animals. DAFF lists improved abattoir infrastructure and training of abattoir workers in animal handling as the primary animal

\textsuperscript{11} http://www.liveexport-indefensible.com/investigations/middleeast-Dec07.php
\textsuperscript{12} http://www.animalsaustralia.org/investigations/live-export-investigation-2010.php
\textsuperscript{13} Asa Wahlquist, Export of live cattle to Egypt back on, The Australian 9 May 2008.
\textsuperscript{14} Accessible via www.mla.com.au/
welfare improvements in Indonesia. The use of restraining boxes provided “a significant improvement on traditional slaughter”, the use of “smaller ropes” and “less pressure” eased stress for animals.\textsuperscript{16} However, the ongoing difficulty of slaughtering the larger Australian animals is clearly acknowledged.

In May 2010 MLA/LiveCorp published a Final Report of the 2009/10 Live Trade Animal Welfare Partnership on Indonesian point of slaughter improvements.\textsuperscript{17} This report states that activities will include assessment to identify facilities and recommend achievable improvements required to assist facilities to meet OIE standards.

Thus it was known that facilities slaughtering Australian cattle did not meet OIE standards. Although regrettably MLA/LiveCorp apparently were not familiar with all the facilities slaughtering Australian animals, it is inconceivable that they were not aware of the major animal welfare problems identified in March this year by Animals Australia.

Incorporated into the LTAWP report are the results of an independent review by a panel of experts.\textsuperscript{18} The panel identified slaughter as posing the greatest welfare threat to cattle. It is hard to correlate the cruelty revealed on a subsequent visit by Animals Australia with the panel’s conclusion that “animal welfare was generally noted to be good. Surprisingly, given Professor Grandin’s assessment of the Mark I Box, the panel considered that the box had brought “obvious welfare improvements”. The improvements the expert panel recommend indicate they had observed the distress caused to animals brought down in this way, but were satisfied the system should continue.

The LTAWP report clearly indicates that major problems of slaughter techniques were known to MLA/LiveCorp. Details in the report, from 11 abattoirs visited [by the expert panel] show the majority of animals observed during slaughter (29 cattle) were subjected to significant levels of pain, fear and distress during handling and an inhumane slaughter. 17% of animals regained their feet after the fall, and on average lifted their head (head slaps) 3.5 times. The report states that “the average number of cuts was four”, with up to 18 cuts applied on one occasion. The panel also noted “significant animal welfare issues” when animals fell severely from the restraining box and head slapping occurred.\textsuperscript{19}

In conclusion, the monitoring and reporting of export consignments of feeder or slaughter livestock up to and including the point of slaughter, on the evidence preceding, is woefully inadequate with disastrous animal welfare consequences. Despite the presence of Industry staff and Australian government representatives in receiving countries, poor welfare standards to the point of extreme cruelty have continued with no effective programme for an acceptable level of improvement. Trade expansion and economic benefit have been the overriding goals of Australia’s live export trade. Had it not been for investigations by animal protection organisations this situation would have continued, unchanged.

\textsuperscript{16} Ibid Yet the Mark I box was condemned by Professor Temple Grandin as “violating every humane standard there is all around the world”, \url{http://www.abc.net.au/4corners/content/2011/s3230934.htm}


\textsuperscript{18} Ibid Appendix 1 Final Report: Independent study into animal welfare conditions for cattle in Indonesia from point of arrival from Australia to slaughter, prepared for MLA and LiveCorp, May 2010

\textsuperscript{19} Ibid p.31 of Appendix 1
Government decision to permit resumption of live cattle trade to Indonesia

The lifting of the ban on the export of live cattle to Indonesia leaves critical questions unanswered:

Have the necessary improvements been made to Indonesian abattoirs in the short time – just one month – since shocking footage emerged showing brutal treatment and widespread abuse of Australian animals in Indonesian abattoirs? If so, what animal welfare guarantees have been put in place? This is particularly relevant given that no Australian veterinarians or officials have apparently been permitted to enter Indonesian slaughterhouses for assessment since imposition of the ban in early June.

The Order lifting the ban only requires the transport, handling and slaughter of Australian cattle to be in accordance with OIE recommendations, which are designed to lift the most rudimentary of handling and slaughter in developing countries to a minimum standard and are totally inadequate in the Indonesian situation. OIE recommendations are not appropriate for the large volumes of cattle sent to facilities in Indonesia that should benefit from higher welfare standards than the OIE minimum standards bearing in mind the considerable input and support from a well-established Australian industry and the Australian Government. Upright restraint and pre-stunning should be the absolute minimum requirement in slaughterhouses receiving Australian cattle. What are the precise slaughter standards stipulated for trade resumption? What measures are being taken to ensure that higher standards will be achieved?

When lifting the ban, the Government’s statements made no mention of the Mark 1 restraint box, condemned by those who have witnessed its cruel impact upon cattle, causing terror, pain and suffering. Critics of the Mark 1 box include internationally renowned Professor of Animal Science Temple Grandin. Australian veterinarians have been unable to assess the Mark 1 boxes due to their not being allowed to enter Indonesian slaughterhouses, despite repeated claims by the Australian Government that these boxes would be assessed before any form of trade would resume. What are the Government’s directions regarding use of this box?

The welfare precautions for the trade again rest with industry, which repeatedly has been shown to have failed the Australian public in meeting expectations of humane treatment of animals exported overseas. Most recent and shocking are the revelations in Indonesia that industry was aware of gross mistreatment and cruelty to cattle at slaughter, but let it continue. We understand that regular audits are to occur. However, this still raises the question as to who will be on the ground in Indonesian slaughterhouses to maintain oversight, to ensure that cattle receive humane treatment and that cruelty does not occur in-between audits. Without constant oversight of cattle slaughter, we anticipate that audits will not prevent inhumane treatment.

To whom will Auditors report and what will be the repercussions for those found to have transgressed welfare requirements? If Auditors are to report to Industry we have no faith that cruel treatment will be properly dealt with. The Government’s press statement indicates that audit reports will be made public. To whom, and by what means will this be so?
The Government has not indicated how frequently audits will be carried out. *We need to know how frequent audits will be.*

### Annex I

**Contraventions of OIE Guidelines on animal welfare in Egypt in December 2006**

Animals Australia has documented breaches of the following requirements of the OIE Guidelines for (i) the transport of animals by land and (ii) the slaughter of animals for human consumption:

**Guidelines for the transport of animals**

- Requirement for animal handlers to handle animals humanely and with care especially during loading and unloading (3.7.3.2 (3)), and to be patient, considerate and competent (3.7.5.1 (2)).
- People loading animals to do it without unnecessary noise, harassment or force (3.7.3.7 (1))
- Requirement for appropriate transport vehicles to be used and for trained people to load the animals (3.7.3.2 (4))
- Animals to be protected from hot conditions during travel (3.7.3.8 (3)), and to have a sufficient space allowance (3.7.3.4 (6); cramming sheep into a car boot breaches these requirements.
- Painful procedures and physical force not to be used to move animals (3.7.3.7 (3))

**Guidelines for the slaughter of animals**

- The throwing or dropping of animals, or their lifting or dragging by body parts such as tails, head, horns, ears, limbs or wool is not permitted (3.7.3.7 (3) & 3.7.5.2 (1))
- Conscious animals not to be thrown or dragged (3.7.5.2 (1))
- Loud, sudden noises and shouting should not occur (at abattoirs, holding areas) (3.7.5.1-3)
- Methods of restraint causing avoidable suffering should not be used on conscious animals because they cause severe pain and stress, such as the mechanical clamping of an animal’s legs or feet or cutting leg tendons (3.7.5.2 (3) & 10)
- During the slaughter of animals, a very sharp knife of sufficient length must be used so that the point of the knife remains outside the incision during the cut (3.7.5.9).
Annex II

Contraventions of OIE Guidelines on animal welfare in Jordan, the UAE, Kuwait and Oman in September 2007

A filmed investigation by Animals Australia in September 2007 revealed the following breaches of OIE guidelines on animal welfare in Jordan, the UAE, Kuwait and Oman:

The UAE

Guidelines for the slaughter of animals: breaches observed at the Al Ain abattoir

- Article 3.7.5.2(1) requires animals to be transported to slaughter in a way that minimises adverse animal welfare outcomes. This guideline was breached in the case of sheep, a calf and a camel.
- Article 3.7.5.1(2) requires personnel engaged in the unloading, moving and slaughter of animals to be patient, considerate, competent and familiar with the OIE guidelines. The personnel unloading, moving and slaughtering the animals acted in breach of this guideline.
- Article 3.7.5.2(1e) requires animals to be handled in such a way as to avoid harm, distress or injury. It prohibits the dragging of animals by body parts. This guideline was breached in the case of all the animals observed.
- Article 3.7.5.3(2 i) provides that ramps should be used for the unloading of animals where there is a difference in height or a gap between the floor of the vehicle and the unloading area. This guideline was breached; there was no ramp for unloading the camel or the calf with the result that animals were pulled or dropped from the truck.

The transportation of sheep in a car boot breaches several of the OIE guidelines for the transport of animals on land, particularly Article 3.7.3.5(4e) which requires vehicles to have adequate ventilation.

Jordan

Guidelines for the slaughter of animals: breaches observed at an abattoir in the livestock market in Sahab

- Article 3.7.5.1(2) requires personnel engaged in the moving and slaughter of animals to be patient, considerate, competent and familiar with the OIE guidelines. The personnel moving and slaughtering the bull acted in breach of this guideline.
- Article 3.7.5.2(1e) requires animals to be handled in such a way as to avoid harm, distress or injury. This Article was breached in the case of the bull.
- Article 3.7.5.2(1e) stipulates that animal handlers must never “resort to violent acts to move animals”. Article 3.7.5.2(1f(iv)) provides that aids which cause pain and suffering, including lengths of metal piping, should not be used to move animals. Both these guidelines were clearly breached by the repeated hitting of the bull with a metal pole.
- Article 3.7.5.9 provides that when animals are bled without prior stunning there must be a “High level of operator competency. A very sharp blade or knife of sufficient length [must be used] so that the point of the knife remains outside the incision during the cut; the point of the knife should not be used to make the incision”. This guideline was breached during the slaughter of the bull. The operator was totally incompetent and the point of the knife was used to stab the animal on several occasions.
Kuwait

Guidelines for the slaughter of animals: breaches observed at the Shuwaikh abattoir

- Article 3.7.5.1(2) requires personnel engaged in the unloading and moving of animals to be patient, considerate, competent and familiar with the OIE guidelines. The personnel unloading and moving the animals at the abattoir acted in breach of this guideline.
- Article 3.7.5.2(1e) requires animals to be handled in such a way as to avoid harm, distress or injury. It prohibits the dropping of animals and the dragging of animals by body parts. This guideline was breached in several cases.
- Article 3.7.5.3(2 i) provides that ramps should be used for the unloading of animals where there is a difference in height or a gap between the floor of the vehicle and the unloading area. This guideline was breached; there was no ramp for unloading at the abattoir with the result that animals were pulled or dropped from the truck.
- Article 3.7.5.3 (3d) provides that ventilation in abattoir lairages “should be able to cope with the range of expected climatic conditions and the number of animals the lairage will be expected to hold”. The ventilation in the Shuwaikh abattoir was inadequate with the result that the animals experienced severe heat stress.

Oman

Guidelines for the slaughter of animals: breaches observed at the Barka abattoir and the municipal abattoir in the municipality of Jalan Bani Bu Hassan in Eastern Oman

- Article 3.7.5.1(2) requires personnel engaged in the unloading and moving of animals to be patient, considerate, competent and familiar with the OIE guidelines. The personnel involved in unloading and moving the animals acted in breach of this guideline.
- Article 3.7.5.2(1e) requires animals to be handled in such a way as to avoid harm, distress or injury. It prohibits the dragging of animals by body parts. This guideline was breached in several cases.
- Article 3.7.5.3(2 i) provides that ramps should be used for the unloading of animals where there is a difference in height or a gap between the floor of the vehicle and the unloading area. This guideline was breached; there was no ramp for unloading at the Barka slaughterhouse with the result that animals were pulled or dragged from the truck.

Guidelines for the transport of animals

Article 3.7.3.5(4e) provides that vehicles should have adequate ventilation to meet the thermo-regulatory needs of the animal species being transported and that the ventilation system (natural or mechanical) should be effective when the vehicle is stationary. The ventilation in the stationary vehicle was completely ineffective.

[ends]