

THE BLE REPORT

INDEPENDENT
INVESTIGATION FINDINGS

BENDIGO LIVESTOCK EXCHANGE
2025–2026

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LETTER FROM THE INVESTIGATOR

Most Bendigo residents know the livestock exchange is there. These days it's surrounded by suburbia, but every Sunday the trucks still roll in. You can smell them long before you see them. Sometimes you hear them first too. For most people, they're just part of the background. They pass by without a second thought. Most have never been inside the sale yard and know very little about what happens beyond the gates. I know the Bendigo Livestock Exchange.

If you walked through the gates for the first time, it feels like organised chaos. Buyers talking over one another. Staff moving quickly between pens. Sheep calling out across the yards. Everything seems to happen at once. After a while, you stop noticing the noise. What you don't stop noticing are the animals.

I'm not affected by the ordinary sounds sheep make. Anyone who has spent time around livestock knows those sounds well. What affects me is seeing animals that are suffering when they shouldn't be.

That's why you and I are here now.

At first, I was looking for individual incidents. Returning week after week changed everything. What first appeared to be isolated observations gradually became recurring patterns. Those patterns became impossible to ignore. This report follows the investigation as it unfolded, the truth inside one of **Victoria's largest livestock exchanges**.



→ **233+ DEAD**
OVER 20 SALE DAYS

→ **7 MONTHS**
NOV 25 - MAY 26

→ **33+ LAMBS**
MINIMUM DOCUMENTED

HUMANE DESTRUCTION PROCEDURES



Why were sheep being euthanised after arriving at the livestock exchange?

Humane destruction is supposed to end an animal's suffering quickly when recovery is no longer possible. So when it happens inside a livestock exchange, two questions matter: why did the animal need it, and was it done correctly? I documented two euthanasia incidents, both involving a captive bolt firearm.

Two incidents may not sound like much against the thousands of sheep moving through the Bendigo Livestock Exchange. But what I saw in those two incidents stayed with me. I didn't know it then, but they would frame two questions that followed me through the rest of the investigation: how did these sheep get here, and what happened once they did?

INVESTIGATION



The end of November marked the start of the investigation. It wasn't something I had ever imagined doing. Looking back now, I couldn't have known that the events of that morning would stay with me long after leaving the sale yard. One of the most important jobs within any livestock exchange is the euthanasia of animals whose condition has deteriorated beyond recovery. If animals arrive in that condition, their suffering should end quickly and without unnecessary distress. That morning, I watched a sheep struggling to remain on their feet. The operator put her behind a swinging gate, using it to hold her still before placing the captive bolt firearm against her forehead. The shot was fired. She immediately collapsed. The operator turned away and climbed into a small loader fitted with a hydraulic grab bucket, the machine used to transport deceased animals to the disposal area. As the bucket approached her, I realised she was still alive. Her legs were moving. Without any further assessment, she was lifted into the bucket and transported to the disposal area. Watching her kick while being handled as though she had already died was something I had never expected to witness. I left the sale yard that day hoping it was an isolated incident. I was wrong. Roughly three weeks later, I witnessed a second sheep being transported towards the same disposal area in the same loader. Again, kicking in the bucket - seemingly alive. After they were deposited onto the ground, more kicking. The operator casually returned and administered a second captive bolt shot. Then he kicked them, like that was the official test of death. My hand was shaking, but I managed to capture it all on camera.

OUTCOME



Sheep Advocate Australia lodged **two formal complaints under Category 1 — Humane Destruction Procedures**, following review of the evidentiary material collected throughout the investigation. The investigation documented two euthanasia incidents involving the use of a captive bolt firearm. In both instances, the procedures observed raised questions about whether accepted euthanasia practices were followed. The purpose of the procedure is not simply to administer a captive bolt shot. Death must occur swiftly and be confirmed before an animal is moved or otherwise handled as deceased. In both documented incidents, the sheep were observed to remain alive following the initial captive bolt application. In one instance, a sheep was transported to the disposal area while visible movement continued. In the second incident, another sheep was deposited at the disposal area while movement remained visible, after which a further captive bolt shot was administered. These observations formed the basis of **Complaints 1.1 and 1.2**, which were submitted to Agriculture Victoria for independent assessment and consideration under the applicable animal welfare legislation, standards and accepted euthanasia procedures.

COMPROMISED LIVESTOCK AND WELFARE INTERVENTION



Why were compromised sheep entering the Livestock Exchange?

The euthanasia incidents left me with more questions than answers. As the investigation continued, that question became harder to ignore. I noticed sheep arriving with injuries, illness and physical conditions that required attention. At first, I struggled to understand exactly what my role was. What counted as a welfare incident? What should I photograph? What should I report and catalogue? I answered those questions fast. I would document what I saw and allow the material to be assessed afterwards. At that early stage, I didn't know which observations would become formal complaints or how significant they might appear when considered together.

INVESTIGATION



It's November still, and I was only beginning to understand what I had committed myself to. That month, I watched workers walk past a ewe who was down but still alive. Nobody appeared to give her a second thought. She remained where she had fallen, on the concrete sale pen floor. Further along the yards, another sheep had been dragged to the centre isle in full view. I couldn't determine if they had been moved before or after death. What stayed with me was how easily the ordinary activity of the saleyard continued around them. By January, the livestock exchange was moving at a fast pace, but I was noticing more. One ram had a horn broken away from his skull, with exposed tissue hanging across his face. During loading, I watched a sheep go down, disappearing beneath the other animals whilst pressured by a working dog. I found myself wondering how such a situation could go unnoticed. February brought heat. One ewe lay in the busiest part of the facility, salivating and struggling to breathe. She appeared to be deteriorating quickly and in need of urgent attention. When I returned later, she had passed away while the auction continued around her. There were further horn injuries, more blood, and groups of sheep with wounds behind their ears and along the tops of their necks.

CONTINUED



As the year progressed, the observations kept accumulating. One ewe lay severely bloated on the ground. She was alive and appeared in obvious distress, but I saw no intervention. Sheep appeared with marked lameness and injuries that prevented them from walking normally. Newborn lambs appeared alongside their mothers. I started to feel the first knot in my stomach that would later become familiar. March brought another ewe convulsing in full view of the yard. There was no realistic way she could have gone unnoticed. She died where she lay. I documented further horn injuries, untreated wounds and a sheep with what appeared to be exposed tissue behind their front leg. One ram had testicles swollen to an extraordinary size. Looking at him, I could only imagine the pain he must have been experiencing. With no exaggeration, the size of a football. There were sheep down, obviously unwell - scouring, hanging their heads through the fencing while kneeling in excrement. Others were wedged behind gates, separated from the main pens. At first, I wondered whether they had been placed there awaiting euthanasia. Sale activity ended; however, some remained in those positions. I also documented severe wool-break, large areas of missing fleece and extensive scabbing across a sheep's back.

CONTINUED



Then came Tex.

His ear tag read Tex 2020. He was six years old and appeared to be a self-shedding breed, but his fleece hadn't shed. It was heavily matted, and who knows what condition might have been hiding underneath it.

Tex and another sheep were both bleeding from the nose.

My only thought was:

"They shouldn't be here."

OUTCOME



Sheep Advocate Australia lodged **nineteen formal complaints under the category Compromised Livestock and Welfare Intervention** following review of the material collected throughout the investigation. The complaints documented sheep presenting with a broad range of welfare concerns, including significant injuries, severe lameness, traumatic horn injuries, apparent illness, physical deterioration and conditions appearing to require urgent welfare assessment or intervention. The category also included incidents involving sheep observed dying, deceased or remaining in compromised conditions within the livestock exchange environment. Each documented incident was assessed against the relevant animal welfare legislation, standards and accepted welfare practices before being incorporated into the formal Complaint Series. The purpose of that assessment was not to determine legal liability, but to identify matters considered appropriate for independent regulatory review. The observations in this category formed the basis of **Complaints 2.1 through 2.19**, which were submitted to Agriculture Victoria for independent assessment and consideration.

STOCKING DENSITY AND PEN MANAGEMENT



What does stocking density reveal about welfare management?

Over the course of the investigation, my attention gradually shifted beyond individual sheep and towards the environment they were standing in. After documenting injuries, illness and compromised animals, I began noticing something else - the pens themselves.

At first, it just didn't look right. **When does a full pen become too full?**

I'm no expert in stocking density, but if sheep are packed so tightly that one becomes buried beneath the others until only their face is visible, it's clearly wrong.

INVESTIGATION



I cast my eyes down the long rows of sale pens. They were crammed on both sides. Mostly Merinos. **There was barely room for them to move, let alone turn around.** At first, I couldn't distinguish what was an overstocked pen and what wasn't - every lane looked the same. I filmed the full length of the sale pens and left the assessment to those within the investigation who understood the applicable standards better than I did. Then I saw the pen in the centre of the sale yard. It was in the main sales area where most of the activity took place. Sheep had been packed into a pen so tightly they were stacked on top of one another. Near the bottom of the group, I could only see one sheep's face protruding from beneath the others. That wasn't something that happened by accident. Someone had squashed them in like that. The more I watched, the more I noticed smaller sheep wedged beneath larger ones, their legs protruding through the pen rails. Other sheep were standing on the heads and backs of those beneath them simply because there was no room left in the pen. In another pen, the pressure had become so great that sheep were forced upwards into the corner of the rails. Their backs and stomachs were visible above the rest of the group. That answered it. **When does a full pen become too full?** Throughout the investigation, I documented every situation that appeared to raise concerns about stocking density. Some situations were difficult to demonstrate objectively through photographs or video alone, even though they were much more obvious standing there in person.

OUTCOME



Sheep Advocate Australia lodged **five formal complaints under the category Stocking Density and Pen Management** following assessment of the evidentiary material collected throughout the investigation. The complaints documented recurring observations of sheep confined in conditions that appeared to raise concerns regarding stocking density and pen management.

These included sheep packed so tightly that individuals were observed positioned on top of one another, smaller sheep compressed beneath larger animals, limbs protruding through gates and pen rails under significant pressure, and groups confined within pens at densities considered to warrant further regulatory assessment. Not every observation of apparent overcrowding progressed to a formal complaint.

Where stocking density could not be objectively demonstrated from the available photographic or video evidence, the incident was documented but not incorporated into the complaint series. This approach reflected Sheep Advocate Australia's commitment to lodging only those matters capable of independent evidentiary assessment.

These observations formed the basis of **Complaints 3.1 through 3.5**, which were submitted to Agriculture Victoria for independent assessment and consideration under the applicable animal welfare legislation and standards.

DEPENDENT LAMBS AND RELATED ANIMAL WELFARE MATTERS



Why are dependent lambs entering the Livestock Exchange?

By this stage, I thought I'd seen it all. I hadn't.

Earlier, I hadn't understood everything I was looking at. There was too much happening at once. If you blinked, you'd miss something. I hadn't gone to the livestock exchange expecting to investigate it for months. I'd noticed something that deserved a closer look. Then I kept coming back. Then I started noticing something different. **Mothers. Babies. Not just young sheep. Dependent lambs.** Certain days, the cries were carpeting the entire facility. They were everywhere.

I saw staff auctioning mothers with babies that were still obviously drinking from them. Lambs that appeared to have been separated from their mothers before they were ready. Lambs that, to me, simply shouldn't have been there. I said earlier that the ordinary sounds of sheep don't bother me. Well, these were the sounds of very hungry babies screaming for their mothers.

And that bothered me – a lot. All those babies. So many of them.

I remember thinking: how many of these babies are going to survive this?

INVESTIGATION



“Animals with severe spinal deformities”.

Others so thin they stood hunched in the corner of pens.

I saw my first horn-blind sheep. I’ve seen wool-blind sheep, but never this. This large Merino ram’s horns had grown across his eyes to the point where his only line of sight was through the curls of the horns — virtually nothing.

Nearby stood another sheep whose **legs bowed so severely they curved beneath them**. Beside them was another whose rear leg foot and half a hock was missing. The more I looked, the more I realised these weren’t isolated situations.

Then my attention shifted to the lambs. A ewe desperately called from a pen while her baby answered from another. The lamb wandered through gaps their mother couldn’t pass, screaming constantly as they searched for one another.

On another sale day I found a lamb completely alone.

Not a young sheep.

A baby that should be drinking from their mother.

CONTINUED

Overgrown hoofs - case file image



As I continued, I found myself wandering into a place most wouldn't dare go. I reached the disposal area. **Essentially bodies dumped in a car park waiting for Bendigo Council to pick up.** Among the dead sheep were newborn lambs lying beside their mothers. I stood there for some time. I admit, I was emotional by then. I couldn't make sense of what I was looking at. Back in the sales pens, mothers and babies were being auctioned together. Some of those lambs looked only days old. Some slightly older had electronic identification tags and were being offered for sale.

I couldn't understand how animals still so obviously dependent on their mothers had entered the saleyard at all.

deceased newborns & mothers



I documented sheep walking on their knees. Others slipped across the concrete on hooves so overgrown they barely resembled feet. I saw sheep whose noses appeared badly damaged, others with similar injuries to their feet, and one sheep in the disposal area whose throat and neck had been consumed by maggots. Some of those conditions looked old. By now, every sale day ended the same way. I drove home replaying the images in my head. The mothers. The babies. The cries across the yards. One little newborn lamb chased me.

The hardest thing so far was turning my back on that little lamb for the greater good of the investigation.

COMPLAINT SERIES

→ 33%

TOTAL DOCUMENTED

→ 30+ LAMBS

OUTCOME



Sheep Advocate Australia lodged **twenty-seven formal complaints under the category Dependent Lambs and Related Animal Welfare Matters** following review of the evidentiary material collected throughout the investigation. Unlike the preceding category, which focused primarily on welfare matters requiring intervention within the livestock exchange, this category was established to capture observations where the apparent welfare concern existed before the animals entered the sale yard environment or arose during transport to the facility. While many of the animals displayed significant injuries or conditions requiring urgent attention, the defining characteristic of this category was that the observed circumstances raised broader questions about how those animals had entered the saleyard system in the first place.

The complaint series included observations involving dependent lambs, ewes accompanied by dependent lambs, apparent chronic injury and disease, severe hoof overgrowth, horn blindness, maggot strike, and other conditions considered appropriate for independent regulatory assessment under the relevant animal welfare legislation and livestock transport requirements.

These observations formed the basis of **Complaints 4.1 through 4.27**, which were submitted to Agriculture Victoria for independent assessment and consideration under the applicable animal welfare legislation, livestock transport standards and associated welfare requirements.

LIVESTOCK HANDLING PRACTICES



What do livestock handling practices reveal about operational welfare?

I've been looking around here for a while now.

Of all the things I've seen, and all the things I'm now aware of – what about the staff?

As you can probably imagine, it feels like a bit of a boys' club. The longer I stay here, the more I've felt there's a culture of turning away. A culture of not saying anything.

People see things, people walk past things, and the day just seems to carry on.

I'd spent significant time watching the sheep. It was time to document the people and the behaviour.

INVESTIGATION



2 dogs attacking a sheep in a loading race - a third tied up

It took a while to shift my attention. I'd been so focused on sheep health and welfare that I'd missed a lot of staff behaviour. But some incidents I captured perfectly — I didn't miss a thing.

I'd seen a large sheep running through the aisles earlier. At some point, the sheep attempted to jump a fence, caught their leg in the top rail and ended up hanging from the fence by that leg. Can you believe it?

I documented two men coming over, lifting the sheep and unhooking them from the fence. The sheep's leg was completely broken. What happened next left me speechless. Instead of taking the sheep through the gate, or securing them in a medical area, the two men unhooked the sheep and put them straight back over the fence.

They dropped the sheep to the ground with a broken leg - placing them back into the flock.

CONTINUED



staff accused of aggressive handling

Another incident involved a worker pushing sheep through a race. He had hold of a sheep's face with both hands, forcing their head downwards. Then, when he let go, I watched him **punch the sheep in the head**, seemingly for no reason. His co-worker standing beside him didn't bat an eyelid. Neither did the worker only metres away.

One of these workers appeared in another piece of footage that left me questioning how some staff were being taught to handle sheep. I watched **unnecessary handling** continue while he was having a conversation.

The sheep was pulled around, sitting back on their rear while their head was being yanked from side to side, before being held between the workers' legs and walked to another pen. I was baffled by what I was watching.

I couldn't understand why the sheep had been separated, why the handling continued for so long, or why nobody more senior appeared to intervene.

That absence of intervention became difficult to ignore.

CONTINUED



sheep wedged between a fence and gate

I couldn't identify a suitable pen for compromised sheep. Instead, I repeatedly saw sheep wedged behind gates. One ewe who appeared unable to use her front legs was left distressed, confined between a gate and the fence. I saw **no urgency to relieve her suffering** and no medical attention while I was watching.

Then there were the dogs. This became one of the most disturbing things I witnessed. On one occasion, one dog was outside the race while two others were inside. **The two dogs chased a sheep along the race and into the back of a truck.** The sheep was clearly panicked. At one point they ran full force and headfirst into a metal fence trying to escape. The dogs chased them back into the truck. Then it happened again. The situation was on repeat. Eventually the **dogs pounced on the sheep** and brought them to the ground. I couldn't see how a sheep could go through that ordeal without a serious risk of injury. Their barking was constant. One dog at the end of the race, outside it, was tied up and barking, encouraging the two free dogs to pack-attack.

What disturbed me almost as much as what was happening to the sheep was that I couldn't see anyone intervening to stop it. **The incident was captured on film.**

CONTINUED



one of several truck drivers observed aggressively handling sheep.

On another day, sheep were waiting in a race to be loaded. The dogs appeared to be there to prevent them from backing out and to assist movement towards the truck. But while the sheep were stationary, two dogs drove one sheep out of the race and began chasing them away from the loading area, freely chasing them through the broader open pen area. They weren't moving the sheep towards the truck. They were chasing one away from it. This time however, the footage captured something else. A worker associated with the truck was standing there watching. I saw no intervention.

Then came the conduct of one particular truck driver. **The aggression during unloading was confronting**—the shouting, the swearing and the way the animals were being handled. He was carrying an electric livestock prod. One sheep appeared to be causing difficulty inside the truck. I didn't capture the entire interaction clearly enough on camera to say exactly what happened from beginning to end, and I don't know what condition that sheep was in. But I saw the driver **repeatedly thrusting the electric prod towards the sheep inside the truck**. From where I was standing, the action looked aggressive and forceful. The footage doesn't capture everything I witnessed. But it captures enough to raise serious questions about what was happening inside that truck.

There were other incidents involving human behaviour throughout this investigation that I couldn't properly record. Photographing an injured sheep is one thing. Capturing a person behaving inappropriately in the moment, without them knowing they're being filmed, is considerably harder. So, I know I didn't capture everything. But I captured some of it. And by then, what troubled me wasn't only what individual people were doing. It was how often other people appeared to be standing nearby when they did it.

OUTCOME



sheep with broken leg - dropped after being hooked on a fence

Sheep Advocate Australia lodged **seven formal complaints under the category Livestock Handling Practices** following review of the evidentiary material collected throughout the investigation.

The complaints related to documented handling practices involving sheep within the livestock exchange environment, including incidents concerning physical restraint, unnecessary or excessive handling, the management and control of working dogs, and conduct associated with loading and unloading activities. Human behaviour was often more difficult to document than the condition of individual sheep.

Many interactions occurred quickly, outside the investigator's immediate field of view, or before recording could begin. Accordingly, only incidents supported by sufficiently clear evidentiary material were progressed into the formal Complaint Series.

These observations formed the basis of **Complaints 5.1 through 5.7**, which were submitted to Agriculture Victoria for independent assessment and consideration under the applicable animal welfare legislation, standards and livestock handling requirements.

WORKING DOGS, LIVESTOCK IDENTIFICATION AND OPERATIONAL PRACTICES



How do working dogs and daily practices affect welfare?

By this point, I knew the yards well. And I knew enough to recognise the same basic issues appearing again and again. Unmuzzled dogs were becoming impossible to ignore. I'd lost count of how many I'd seen. By now, I knew there were rules surrounding their use and presence. And after what I've already witnessed with **dogs chasing sheep and bringing them down**, it's difficult not to have a heightened level of concern.

Then there's the ear tagging. **A lot of ear tagging.**

At first, I didn't know whether it meant anything. Maybe it was harmless. Maybe there was a perfectly reasonable explanation. But I also know enough to understand that livestock identification exists for traceability. And I keep seeing sheep arriving without tags. Then, somewhere inside the sale yard, they're being tagged. **That's a red flag.** Then there's the coughing. Pens of sheep with green discharge running from their noses. Animals that simply don't look well.

And then there were the lambs again. **What was happening to those babies after the sale?**

I started noticing something else. It appeared remarkably easy for someone to simply walk into the yards, pick one up and leave. That's what it looks like from where I'm standing.

INVESTIGATION



worker ear tagging sheep on-site

In the loading docks. Around the facility. Working sheep through the yards – I documented a lot of dogs. Many were close to their owners. Others were not. Some appeared to be moving through the facility with little obvious supervision or control. What became interesting was how often they appeared in footage when dogs weren't the set focus. We'd review video — another unmuzzled dog. Sometimes they were captured almost by accident. I saw a lot of ear tagging being carried out as part of the normal scan-and-tag process before or during sale operations. It appeared to be handled by a relatively small number of people, and on some occasions, there seemed to be very little activity or attention around them while it was being done.

I documented one sheep coughing repeatedly. That caught my attention for a different reason. Coughing is something I take seriously in an environment where thousands of animals can be held in close confinement. I didn't know what was causing it, and I couldn't diagnose them, but it was something I knew shouldn't be ignored.

Then came the newborn lambs again. On one occasion, I saw two people walking away with several newborns. On another occasion, I watched a person ask a stranger to pick up a starved newborn from a sales pen. The lamb was simply picked up and taken away. The person made a comment that was captured on the recording. **"This one's going straight in the oven."** I remember standing there thinking: did I really just hear that?

OUTCOME



staff/workers openly ignoring dog muzzle rules

Sheep Advocate Australia lodged **16 formal complaints under Category 6 — Working Dogs, Livestock Identification and Operational Practices**, following review of the evidentiary material collected throughout the investigation. These complaints included the repeated presence and use of unmuzzled working dogs within the livestock exchange, including during livestock movement and loading activities. The concerns were considered particularly relevant because requirements governing the use and control of working dogs are already addressed within applicable saleyard standards and on-site operational rules. Other documented matters raised concerns around livestock identification and traceability. Sheep were observed within the facility without identification tags, while tagging activities were also documented as part of sale-day and pre-sale operations. These observations were retained for consideration against the requirements governing livestock identification and traceability. Animal-health concerns were also documented, including repeated coughing observed in an individual sheep within an environment involving the close confinement and movement of large numbers of animals. No diagnosis was attempted by the investigator; however, the observation was considered relevant because of the potential implications of illness within a high-contact environment. The investigation also documented people removing dependent lambs from the livestock exchange. In the situations captured, the investigator could not establish where those lambs were being taken, what records accompanied their removal, or what ultimately happened to them. The observations therefore raised questions concerning the movement, identification and traceability of animals leaving the facility. Only matters supported by sufficiently clear evidentiary material were progressed through the formal complaint process.

These observations formed the basis of **Complaints 6.1 through 6.16**, which were submitted to Agriculture Victoria for independent assessment and consideration under the applicable animal welfare, livestock identification, traceability and operational requirements.

DECEASED LIVESTOCK



How are deceased sheep managed within the saleyard?

We've reached a point in this investigation where there's something at the Bendigo Livestock Exchange I need to show you.

The deceased pile.

I found more there than I ever expected.

The questions were endless.

What about the condition of the bodies, how some animals came to be there?, what happened before and after death?.

I documented the deceased pile after **every sale day**.

And when you put all that footage together and look at it as one continuous record, it's a **horror show**.

INVESTIGATION



deceased sheep in horrendous condition - death appears traumatic

The deceased pile sits out the back of what they call the old pig sheds. It's confronting. Some of the bodies appeared to have experienced **significant trauma**. Others were in such an advanced state of decomposition that it was difficult to understand how long they had been dead or where they had come from. I documented sheep with extensive damage to their faces. Sheep whose bodies had become green, moldy and severely decomposed.

Sheep with limbs twisted into unnatural positions. One sheep had flystrike so extensive that much of their face had been eaten away. A condition like that raised an obvious question about how long it had been present. Some sheep showed evidence consistent with having undergone captive-bolt euthanasia at the facility.

That immediately took me back to where this investigation began. Other bodies raised an entirely different question. Had some of these sheep arrived dead? **And if they had, how does an animal considered suitable to be loaded onto a truck die before reaching**—or while being transported to—the livestock exchange?

CONTINUED



Deceased sheep with extreme fly strike on the neck and throat

The more I documented the deceased area, the more important it became.

Because almost every body seemed to raise another question.

What happened to them?

Where did they come from?

When did they die?

Were they euthanised?

Did they die during transport?

Were they already compromised before they were loaded?

And was any of it recorded?

Then we noticed something else. The number of bodies didn't always appear to accumulate in the same way. At certain times, bodies appeared to be removed from the site more quickly than other times. But every one of those bodies raised the same traceability question. Now, the deceased area was bringing many of the investigation's questions together in one place. The visual condition of some of those bodies was deeply confronting.

Whatever the explanation ultimately proves to be, what was documented there cannot simply be ignored.

OUTCOME



multiple deceased sheep in the carpark

Sheep Advocate Australia lodged **three formal complaints under Category 7 — Deceased Livestock**, following review of the evidentiary material collected throughout the investigation. The complaints related to the condition, presence and management of deceased sheep documented at the livestock exchange. Particular concerns arose from the number of deceased animals observed, the varying condition of their bodies, apparent differences in the circumstances surrounding their deaths, and the movement and removal of deceased livestock from the facility.

The documented material also raised questions regarding the circumstances in which individual sheep died, including whether death occurred before arrival, during transport, within the livestock exchange, or following euthanasia. Given the limitations of visual observation alone, Sheep Advocate Australia has not attempted to determine the cause of death of individual animals where that could not be established from the available evidence.

The documented circumstances were instead referred for independent assessment and consideration of any associated record-keeping, animal welfare, transport and livestock management requirements.

These observations formed the basis of **Complaints 7.1 through 7.3**, which were submitted to Agriculture Victoria for independent assessment and consideration under the applicable animal welfare, livestock transport and associated regulatory requirements.

FAILURE TO PROVIDE ADEQUATE SHELTER AND PROTECTION FROM WEATHER EXTREMES



What does weather exposure reveal about welfare planning?

I've seen a lot of sad images. Sheep with almost no fleece, whether recently shorn or because their wool had thinned or fallen away. Sheep standing in a posture I've come to recognise—their four legs drawn closely together, their backs arched, hunched over.

I've seen that posture more than once.

INVESTIGATION



This was unusually difficult to document.

Extreme weather events at the livestock exchange have been documented outside this investigation period. But during the sale days covered by this investigation, the weather generally wasn't extreme enough to provide clear examples of prolonged exposure.

There were, however, two situations that stood out. I documented a sheep with very little fleece left **exposed to cold and wet conditions**.

On another occasion, sheep already displaying welfare concerns were left exposed during torrential rain, including one who appeared to have significant spinal or mobility issues.

There was **nowhere within the sale yard environment for these sheep to be moved** completely out of the weather.

Animals already displaying signs of weakness were exposed to harsh weather.

OUTCOME



compromised sheep alone in the pouring rain

Sheep Advocate Australia lodged **two formal complaints under Category 8 — Failure to Provide Adequate Shelter and Protection from Weather Extremes**, following review of the evidentiary material collected throughout the investigation. The complaints concerned sheep already displaying characteristics that increased their vulnerability to adverse weather conditions while confined within areas of the Bendigo Livestock Exchange where no adequate shelter or alternative weather protection was observed.

The documented incidents included sheep already displaying significant welfare concerns remaining exposed during severe wet weather, and a young sheep with very little fleece coverage left alone within an uncovered holding pen during sustained heavy rainfall. The available evidence could not establish the precise physiological effects of the weather exposure or, in every instance, the duration of that exposure.

The documented circumstances nevertheless raised legitimate questions regarding the adequacy of shelter, welfare monitoring and protective measures available for vulnerable sheep during adverse weather conditions.

These observations formed the basis of **Complaints 8.1 and 8.2**, which were submitted to Agriculture Victoria for independent assessment and consideration under the applicable animal welfare and saleyard welfare requirements.

KEY FINDINGS

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After six months of returning to the same yards, the finding is not one photograph, one complaint or one incident. It is the pattern. Eighty-one formal matters were identified across eight categories, each supported by evidence considered sufficient for regulatory review.

Many are serious in isolation. The real finding is what they show together: failures at more than one stage of the livestock transport and saleyard system.

Fit for Load sits at the centre.

One question kept returning: **How did some of these animals enter the livestock transport and marketing system in the first place?**

Sheep arrived with severe mobility impairment, advanced wounds and disease, extreme hoof overgrowth, severe flystrike and other conditions that appeared to pre-date their arrival at the livestock exchange. Pregnant ewes, mothers with newborn or dependent lambs and dependent lambs without maternal care were also documented. The issue is not whether Fit for Load requirements exist. It is whether they are stopping vulnerable or compromised animals from entering the transport and marketing system.

Mothers and dependent lambs require particular attention

No part of the investigation made the vulnerability of these animals clearer than the repeated presence of newborn and dependent lambs. They were documented in sales pens with their mothers, separated from ewes, **auctioned while still dependent**, among deceased animals, and being removed from the livestock exchange in circumstances where the investigator could not establish their destination or accompanying records.

These were not simply “lambs” as a broad industry class. They were **newborn or dependent young** still requiring maternal care. Their repeated presence raises direct questions about the transport of pregnant ewes and ewes with newborn or dependent lambs at foot.

This was not a side issue.

It was a recurring feature of the investigation.

The livestock exchange has its own welfare responsibilities

Upstream Fit for Load failures do not explain everything that happened after animals entered the facility. Compromised animals remained in the sales environment. Intervention was repeatedly in question. Inappropriate handling was documented. Working-dog control, identification, traceability and humane destruction all generated formal complaints. The Bendigo Livestock Exchange is therefore not simply a receiving point.

It is another point of responsibility.

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Management, staff supervision, training, welfare assessment and the day-to-day enforcement of existing welfare requirements all require examination. Welfare intervention repeatedly came into question. Seventeen of the nineteen Category 2 matters centred on welfare assessment, treatment, management or intervention. The animals included sheep in significant distress, animals unable to move normally, traumatic injuries, bleeding wounds and animals later found deceased. The question became simple:

Once suffering was visible, who was responsible for acting?

The investigation cannot establish what may have happened outside periods of observation. But compromised animals were repeatedly documented without intervention visible to the investigator. That pattern warranted formal referral and raises a broader question about how welfare decisions were being made inside the exchange.

No veterinary treatment was observed across the documented investigation period, the investigator did **not** observe an onsite veterinarian treating livestock. That remained the case despite repeated observations of serious injury, lameness, illness, compromised animals and animals requiring euthanasia.

Humane destruction raised competency and supervision concerns

Two euthanasia incidents involving captive-bolt equipment were formally documented. In both, **sheep remained alive after the initial captive-bolt application** and were **moved before death was confirmed**. That raises direct questions about procedure, competency, training, confirmation of death and management oversight.

Humane destruction is the final intervention when suffering cannot otherwise be relieved. **It must be done correctly.**

A culture of non-intervention was hard to ignore

Some of the most disturbing footage was not only about what one person did. It was about who was standing nearby. Inappropriate handling occurred while others were present.

Compromised animals received no intervention visible to the investigator.

Working dogs chased and distressed sheep while people nearby appeared not to act.

Human behaviour was harder to capture than an injured animal. The footage does not record every incident. But what was captured repeatedly raised the same questions:

supervision, training, workplace culture and accountability.

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Working dogs are one of the clearest examples.

Unmuzzled dogs were repeatedly documented, and dogs were filmed chasing, distressing and, in some cases, bringing sheep to the ground. The dogs are not the thesis of this report. They are evidence of the system. If a straightforward operational control can be ignored or weakly enforced, it is reasonable to ask what that says about the broader culture of compliance.

The same concern extends to livestock identification, traceability and the movement of dependent lambs through and from the facility.

Regulatory presence and observed behaviour

Agriculture Victoria personnel were present at the Bendigo Livestock Exchange on multiple occasions during the investigation period. On days when departmental personnel were onsite, the investigator observed a noticeably quieter and more controlled operating environment.

Many of the behaviours documented on other investigation days were considerably less apparent. The contrast was sufficiently consistent to raise an important question: **If regulatory presence materially changes the behaviour being inspected, how representative is the resulting inspection of normal day-to-day operations?**

Deceased livestock raise an unanswered question of scale

The three formal Category 7 complaints capture only part of what was documented in the deceased livestock area.

Across 19 documented dates, 233 deceased sheep were recorded. Those are point-in-time observations. They do not establish cause of death, and this report does not attempt to assign one. The scale still matters.

Why were so many deceased animals present?

What records exist concerning those deaths?

What analysis, if any, has been undertaken to understand them?

Those questions require answers from the appropriate authorities.

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What we observed beyond the formal complaint series

Not every important observation became a formal complaint.

Some only became clear after months of watching how the facility operated.

No feeding of sheep within the livestock exchange was witnessed.

Access to clean and adequate water raised concerns.

Consistent senior management oversight of animal welfare and handling was rarely apparent to the investigator.

These observations sit outside the 81 formal matters, but they remain part of the investigation record. Livestock were also observed arriving before sale day and remaining after the sale.

Not all holding areas appeared to provide equivalent access to water, and feeding was not witnessed.

The investigation could not continuously follow individual animals from farm departure through to their subsequent destination and therefore cannot establish individual cumulative periods without feed or water.

That means the welfare question cannot be confined to the hours spent at one location.

The whole journey matters.

The welfare clock does not reset when responsibility changes hands.

CONCLUSION

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The investigation does not point to a single failure at a single point in the system.

It points to a chain with repeated opportunities to prevent suffering.

Before loading.

When a transporter accepts an animal.

When the animal arrives at the livestock exchange.

During sale and handling.

Before onward transport.

At each handover, somebody has the opportunity to say:

This animal should not proceed any further.

Too often, the animals documented in this investigation did proceed.

Responsibility changes hands.

Welfare responsibility does not disappear.

Fit for Load should operate as a chain of protection.

For some animals documented here, that chain did not prevent them from progressing.

Moving Forward

The first opportunity to prevent many of the outcomes documented in this report exists before the truck moves.

Was the animal fit to be loaded?

That question must have meaning.

It must protect animals with serious injury, illness or other compromising conditions.

And it must provide **clear protection for one of the most vulnerable groups documented in this investigation: pregnant ewes and ewes with newborn or dependent lambs at foot.**

But reform cannot stop at the farm gate.

Transporters must remain responsible for the animals they accept.

Livestock exchanges must remain responsible for animals in their care.

Those conducting sales and handling livestock must recognise when an animal should go no further. Onward transport must be another safeguard, not simply another movement.

What happened at Bendigo points beyond Bendigo.

It points to the rules governing livestock transport and animal welfare.

After 81 formal matters across eight categories, maintaining the status quo is difficult to justify.

The first place to start is Fit for Load.

What must change before animals reach the saleyard?

For Sheep Advocate Australia, that means stronger fitness-for-transport rules, less ambiguity for vulnerable animals, and clear, enforceable protections for pregnant ewes and ewes with newborn or dependent lambs at foot.

Responsibility must then continue at every handover.

Every point in the chain should be another chance to identify a compromised animal, intervene and stop that animal progressing.

The detailed legislative amendments and policy reforms arising from this investigation will be presented separately.

The final finding is simple: **Policy change is required.**