

The Honourable Michael McCormack MP  
Deputy Prime Minister  
Acting Minister for Agriculture

3 February 2020

Dear Minister,

Thank you for providing the opportunity to provide a submission to the Middle East Sheep Exports Draft Regulation Impact Statement (draft RIS).

While the efforts and time put into creating the submission are appreciated, the failure to include options that are common sense options is dismaying and evidence of a lack of willingness to adequately address the issue.

The live sheep export trade should be ceased immediately. Transitioning sheep breeders to other forms of markets would be economically superior in terms of the ecological damage caused by this trade and both ethically consistent.

While you will have received a great many submissions that identify the 2018 McCarthy Review, which showed the flaws in the current Heat Stress Risk Assessment (HSRA) model, and that the revised HSRA model indicates that 'between 1 May to 31 October either completely or to such an extent that the voyage would not be economical. Therefore, while not explicitly stated, option 3 would effectively prohibit sheep exports for the entire Northern Hemisphere summer.'

All this is accurate.

Additionally, it is too obviously a matter of common sense, and a proven fact, that claiming a commercial industry can self-regulate is merely apologia for a failure to accept evidence, or a means by which merely to ignore it because of pre-existing bias.

I would like to turn your attention instead to the following list titled 'Justifying Trading In Animals'.

Generally the arguments put forward can be categorised as follows:

- It's natural.
- It's part of God's plan.
- Animals are inferior beings. Their suffering is as ethically unimportant
- It's good for animals. What would they do without us.
- It would be too difficult to abolish.
- It is essential to certain industries. It would be economically disastrous.
- It's acceptable in this culture.

- It's generally accepted by the majority in some societies.
- It's legal.
- Abolishing this would threaten the structure of society.
- It's better we do this otherwise there would be none of these animals as we breed them for this.

No doubt there may be some peripheral arguments, but this list pretty much covers the arguments put forward by political parties, their supporters and the industries involved in the trade.

What should be of some interest is where this list comes from. It is summarised from the BBC site discussing the justification of the slave trade 'Attempts to justify slavery'.

<http://www.bbc.co.uk/ethics/slavery/ethics/justifications.shtml> (3 February 2020)

It may well be that 'the science and the evidence is clear', as the RSPCA states.

It is very well the case that the ethics of those involved in and with supporting the trade are also clear.

You cannot claim to have an interest in the welfare of animals when your very business and trade creates massive suffering.

I appreciate the time taken considering my submission. I look forward to a sensible and ethically-based decision that bans the trade immediately and provides those involved a means to move to another form of business.

  
Patrick Elliott-Brennan

