

Submission to the Middle East Sheep Exports Draft Regulation Impact Statement (draft RIS)

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

I support the RSPCA's position that live sheep exports should end altogether because of the inherent and unavoidable risks the trade poses to animal welfare. I believe sheep farmers should be supported to transition away from the live export of animals, and access more sustainable markets for chilled and frozen meat instead.

But while the trade continues it is incumbent upon the Department of Agriculture to ensure the welfare of exported animals is protected to the fullest extent possible.

In 2018, the McCarthy Review identified that the current Heat Stress Risk Assessment (HSRA) model was flawed and recommended that it be revised, which the Department agreed to subject to further testing and consultation.

The Department then established the HSRA Review Independent Technical Committee made up of eminent experts in sheep physiology, animal welfare science, and ship engineering to undertake such testing and consultation. Over the course of the next 12 months the Technical Committee developed an Issues Paper and then a Draft Report with advice and input from key stakeholders for public consultation.

After two rounds of public consultation and several meetings with stakeholders the Technical Committee produced its final report based on the scientific evidence and its collective expert judgment on what the appropriate risk settings should be for heat stress risk assessment in sheep exported to the Middle East.

As explained in the draft RIS:

* In extreme weather, the model may require that a vessel be fully destocked because even if there was only one sheep on the deck the ambient temperature would already exceed the acceptable WBT threshold.

* Under Option 3, the revised HSRA model is expected to reduce stocking rates on all voyages 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.

This outcome is entirely consistent with what the RSPCA and the Australian Veterinary Association have been saying all along. It is too hot to send Australian sheep into the Middle East during the Northern Summer period.

I was therefore shocked to learn that the Department is now proposing not to implement the revised HSRA model as recommended by the Technical Committee and is instead placing the responsibility back in the hands of the very industry that has failed miserably to protect animal welfare to complete the revision.

The Government convened the HSRA Review Technical Committee and stakeholders and the broader public participated in the review in good faith upon the understanding it would lead to a revised HSRA model based on heat stress indicators. The Department can't now walk away from the final review report because the industry and Government do not like the outcome.

If the scientific evidence base is contrary to current Government policy settings, it is the Government policy settings that need to change, not the science.

Accordingly, I call upon the Department to act on the science and implement a combination of Options 2 AND 3 of the draft RIS to ensure that sheep are not subjected to the most dangerous months of the Middle Eastern summer AND the Department implements the revised HSRA Model as recommended by both the McCarthy and the HSRA reviews.

The RIS demonstrates that the WA sheep industry is highly responsive to market signals and has the capacity to adapt. Adjusting farm business to focus more on prime lamb and wool production to service the growing sheep meat export trade will increase jobs on-farm, in the shearing industry, and in the local meat processing industry.

On 10 September 2019, the Minister for Agriculture, Senator the Hon Bridget McKenzie said the live export trade “won’t be conducted at the expense of animal welfare standards.”

The science and evidence is clear. I urge the Department to act upon it by implementing Options 2 and 3 and fulfilling the Government’s commitments to the Australian public.

Thank you for considering my submission. I look forward to seeing decisive action from the Department that reflects the scientific evidence and protects animal welfare.