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# Feedback on Live sheep exports to or through the Middle East—Northern Hemisphere summer Draft regulation impact statement

Submission  
January 2020  
VETS AGAINST LIVE EXPORT  
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In 2018, the McCarthy Review identified that the current Heat Stress Risk Assessment (HSRA) model was flawed and recommended that it be revised. The Department of Agriculture (the Dept) agreed to this subject to further testing and consultation. The Dept then established the HSRA Review Independent Technical Reference Panel (TRP). Over the course of the next 12 months the TRP developed an Issues Paper, a Draft Report, and, after input from key stakeholders for public consultation, a Final Report.<sup>1</sup>

The conclusions from the HSRA Final Report validated the conclusions made many years before by VALE (Caulfield et al 2014). The HSRA TRP's conclusions are reported in the Draft Regulation Impact Statement (Draft RIS):

1. 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.
2. 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.

It is notable that independent analysis by the Australian Veterinary Association (AVA) prior to the McCarthy Review and the HSRA Review concluded that sheep should not be transported to the Middle East from Australia between May and October inclusive.

Every independent analysis finds the same: VALE, AVA, HSRA TRP. The science is clear.

It is entirely predictable but unconscionable that the Dept is now proposing they not implement the revised HSRA model as recommended by the TRP and are instead proposing to place the responsibility of HSRA back in the hands of the very industry that has failed animals for over 40 years.

The Government convened the HSRA Review, and stakeholders and the broader public participated in the review in good faith on the understanding it would lead to a revised HSRA model based on animal welfare and heat stress indicators. The Dept cannot now ignore the final review report because the industry and Government do not like it. The industry and Government need to change. The science will not change.

VALE made a submission to the Policy Options.<sup>2</sup> The Draft RIS has not altered our conclusions and our submission is included unaltered.

VALE insists that the Dept:

1. acts on the science and implements 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

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<sup>1</sup> See <https://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/history/review-northern-summer#release-of-the-final-hsra-report>; accessed 30 Jan 2020

<sup>2</sup> Ibid

2. implements the revised HSRA Model as recommended by both the McCarthy and the HSRA Reviews.<sup>3</sup>

## References

Caulfield MP et al. Heat stress: A major contributor to poor animal welfare associated with long-haul live export voyages. *The Veterinary Journal* 2014;199:223-228

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<sup>3</sup> Ibid