

1 March 2019



Technical Reference Panel
Heat Stress Risk Assessment Review
Department of Agriculture and Water Resources
GPO Box 858
CANBERRA ACT 2601

Dear Technical Reference Panel

RE: Draft report of the Heat Stress Risk Assessment Technical Reference Panel

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the draft report of the Heat Stress Risk Assessment (HSRA) Review, which you have undertaken at the request of the Department of Agriculture and Water Resources.

The NFF was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The draft HSRA Review report makes recommendations for moving from a risk assessment based on mortality, to one focused on animal welfare. The NFF supports the move to an animal welfare-based indicator, as recommended by the 2018 review into the export of live sheep to the Middle East during the Northern Hemisphere summer (the McCarthy Review). The McCarthy Review was an important step towards achieving greater transparency and oversight for the live sheep export industry, and has facilitated real change and improved animal welfare outcomes. These changes strengthened our world-leading regulatory system for live exports, and were met by an industry commitment to a voluntary moratoria on the live export of sheep during the hottest three months of the Northern Hemisphere summer. Industry takes seriously its responsibility to continually improve practices, and to ensure that community expectations for animal welfare are met.

The NFF supports the continuation of a sustainable live sheep export industry that is accountable and delivers positive animal welfare outcomes. The live sheep export trade is critical to many Australian farmers and regional communities, and makes a significant contribution to the broader Australian economy (more than \$250 million in 2016-17). Australia is a leader in the global live export industry as the only country that demands welfare is monitored and protected through the whole supply chain.

We are concerned that the HSRA as proposed has serious limitations, and that if implemented it would put at risk the viability of the sheep live export industry, without necessarily providing the desired welfare outcomes. There is also real potential for far broader repercussions. It is critical that we get the science right before regulatory change is made.

The proposal has significant implications for the livestock industry

The HSRA proposal would prohibit sailing when there is less than a 98 per cent probability that deck temperatures during a planned voyage would remain at or below a wet bulb temperature welfare limit of 28°C. Using this threshold in the manner proposed could significantly affect the volume of trade for more than half the year – from April to October. This would have a significant impact on the Western Australian sheep industry in particular, and flow-on effects for regional communities and participants in the supply chain, including livestock transporters, stockfeed manufacturers, agents, exporters and ship owners. It is therefore critical that the science underpinning regulation is robust, and that a full regulatory impact process is undertaken prior to the introduction of any new measures, which would be difficult to reverse.

While the HSRA Review is focussed on the live export of sheep, there are wider implications that need to be carefully considered before pursuing new regulatory measures. In the immediate term this would be for cattle transported to the Middle East on the same vessels as sheep. In the longer term, there could be implications for the live cattle trade to other markets, and possibly the broader livestock supply chain.

Advice from technical experts has identified issues with the HSRA proposal

Since the release of the draft HSRA report in December 2018, the NFF has worked closely with livestock peak industry councils to examine the HSRA proposal and understand its implications for the sheep live export industry. We are concerned that the recommendations in the HSRA proposal oversimplify a complex issue, are based on a limited data set, and have not been verified in the field. To better understand the proposal, Sheep Producers Australia, the NFF, Cattle Council and the Australian Livestock Exporter's Council engaged the services of a Technical Advisory Group (TAG) with expertise in animal and veterinary sciences, including livestock heat stress, thermal stress models and live export. A list of the TAG members is provided at [Attachment A](#) to this submission.

The TAG identified a number of issues with the HSRA approach recommended in the draft report. The TAG concluded that the 98 percentile wet bulb temperature upper limit used in the model may be neither consistent with the science available, nor provide the desired welfare outcomes. It also found insufficient evidence that the risk of heat stress on ships had been accurately predicted by the modelling presented in the report. The TAG has subsequently put forward a number of suggestions to ensure that sheep are unlikely to experience poor welfare due to heat stress on ships. We refer to the submission put forward by Sheep Producers Australia, which details the technical advice provided by the TAG in response to the draft report recommendations. We also refer to the submission provided by the Australian Livestock Exporters Council, which further highlights the limitations of the HSRA proposal, and makes the case for consideration of an alternative approach.

There have been significant recent improvements in welfare practices

The improvements in the performance of the live sheep export industry over the last ten months are considerable, and serve as an example of what can be achieved. We are concerned that any additional regulatory measures imposed on the trade will not adequately consider this improvement, which includes the following measures:

- Independent Observers (IOs) are now in place for every voyage carrying both sheep and cattle, and report back daily to the independent regulator (the Department of Agriculture and Water Resources). Importantly, the reports of these IOs also represent a valuable scientific resource – access to on-board environmental and welfare data, measured concurrently. This IO data should be used to verify and improve model predictions.
- Stocking densities have been significantly reduced, in line with the recommendations of the McCarthy Review. During the summer trade sheep have up to 39 per cent more space and overall densities are reduced by 28 per cent.
- Industry has imposed a voluntary moratorium on live sheep shipments to the Middle East during the hottest months of the Northern Hemisphere summer (June, July and August).

The changes made in 2018 are already supporting improved animal welfare outcomes for sheep exported to the Middle East, and industry is continuing to look at how it can make further improvements through an ongoing program of research and development. Given these improvements, the limitations of the panel's HSRA proposal, and the significant negative impacts that could result from the introduction of regulatory measures based on that HSRA proposal, we recommend a considered approach. This should recognise improvements to date and allow time to collect appropriate data to improve and verify model predictions, to consider alternative proposals to deliver welfare outcomes, and for the full impact of any associated regulatory measures to be examined in consultation with industry.

Thank you again for the opportunity to comment.

Yours sincerely



TONY MAHAR
Chief Executive Officer

Attachment A – Technical Advisory Group membership

Professor Bruce Allworth,
Director, Fred Morley Centre | Professor in Livestock Systems
School of Animal and Veterinary Sciences | Charles Sturt University

Associate Professor John Gaughan
School of Agriculture and Food Sciences
The University of Queensland

Dr Robin Jacob
Department of Agriculture and Food (WA) – Livestock Innovation

Steve Meerwald
Chief Executive Officer
Harmony Agriculture and Food Company Pty Ltd

Sue Middleton
Executive Director, Brennan Rural Group
2010 Rural Woman of the Year