

Heat Stress Risk Assessment: Draft Report

Who we are

Australian Ethical Investment Limited was established in 1986 to manage the retirement and other savings of Australians in an environmentally and socially responsible way. Today we manage about \$3 billion in superannuation and managed funds for over 40,000 Australians.

As a super fund we invest with long term interests and responsibilities across society and the economy. This perspective is important to consider alongside the voices of individual companies, industries and civil society groups which often focus on narrower business, social or environmental interests. Our broader perspective is embodied in our Ethical Charter (<https://www.australianethical.com.au/australian-ethical-charter/>).

Australian Ethical Investment recognises that animals are sentient and have the capacity to asuffer.¹ Our Ethical Charter requires us to seek out investments which provide for and support the dignity and wellbeing of animals, and avoid any investments which unnecessarily cause them harm. Applying these principles, we avoid investing in conventional forms of animal agriculture, including live export, because we assess that these industries cause significant animal suffering (and are also unsustainable from an environmental perspective).

We comment on the Heat Stress Risk Assessment Review from the perspective of an investor concerned about animal welfare and the harm the live export industry is doing to Australia's reputation.

Our submission

Introduction

Thank you for the opportunity to comment on the Draft Report by the Independent Technical Reference Panel. We were deeply concerned when we saw the footage, broadcast on 60 Minutes in April 2018, from five 2017 live sheep export voyages from Australia to the Middle East. The release of the footage was the latest in a string of animal welfare crises that has plagued the industry for almost the entire history of its existence. However, this footage was different in one important respect. Unlike most of the previous exposures of animal cruelty in the live export trade (which generally related to the treatment of animals by third parties in export destination countries), this footage showed systemic welfare issues at the hands of Australian companies. It exposed an industry that has seemingly treated animal cruelty and suffering as the norm, operating on the assumption that the public would never see what takes place on live export ships. Public trust was understandably shattered after the release of this footage and protests against Australia's live export trade took place throughout Australia and overseas.

¹ See e.g. The Cambridge Declaration on Consciousness, 2012
<http://fcmconference.org/img/CambridgeDeclarationOnConsciousness.pdf> .

Representatives of the live export industry argue they have invested heavily in scientifically-based ‘ground breaking’ research to address heat stress, which is unprecedented in other live exporting countries.² This investment in research has seemingly not translated into better animal welfare outcomes; it is difficult to imagine lower standards of welfare than what was depicted on those five 2017 voyages.

Australian Ethical does not support the continuation of the live export trade. Our assessment is that live export causes great and unnecessary suffering and we continue to advocate for the trade being phased out. However, until that happens, Australian Ethical will continue to support any regulatory and industry changes that mitigate animal suffering.

General comments on the regulation of animal welfare

The Australian public expects that animals used for commercial purposes will be treated humanely (both from an animal wellbeing and animal health perspective).³ Further, Australia trades on its ‘clean green’ food bowl reputation. When Australian agricultural industries are found to be engaging in cruel practices, it undermines that reputation. From both an ethical and commercial perspective, Australian industries that use animals for commercial purposes should adopt high animal welfare standards.

This requires government to regulate and enforce minimum animal welfare requirements. It should not be assumed that industries that use animals for commercial purposes are incentivised to achieve acceptable standards of animal welfare in the absence of regulation. As acknowledged by the 2016 Productivity Commission report into the regulation of agriculture, high animal welfare and productivity do not necessarily go hand-in-hand (and indeed animal welfare can sometimes conflict with commercial incentives).⁴ Nor can it be assumed that increased public awareness of animal welfare issues will drive industries towards better animal welfare practices (as has been suggested by industry bodies in the past).⁵ Market forces are an imperfect means of achieving acceptable standards, particularly in circumstances where there is a lack of transparency in how animals are treated by industry.

While industry should certainly be consulted in the development of regulations that impact their operations, the standard setting process should fairly reflect the interests of all stakeholders and decisions should be independent and science based. This appears to be the approach taken with respect to this particular review and we commend the rigorous scientific process that has been undertaken by the Independent Technical Reference Panel. To ensure this is the rule rather than the exception, Australian Ethical supports the establishment of an independent office of animal welfare at Federal and State and Territory levels, which would (at a minimum) be responsible for the development of animals welfare standards, as recommended by the 2016 Productivity Commission report into the regulation of agriculture.⁶

² Australian Livestock Exporters’ Council submission on the ‘Heat Stress Risk Assessment (HotStuff): Issues Paper’ revised November 2018.

³ Productivity Commission, ‘Regulation of Australian Agriculture’ Inquiry Report No. 79, 15 November 2016.

⁴ Productivity Commission, ‘Regulation of Australian Agriculture’ Inquiry Report No. 79, 15 November 2016.

⁵ See e.g. NSW Farmer’s Association initial submission to the Productivity Commission Inquiry into the Regulation of Australian Agriculture, March 2016.

⁶ Productivity Commission, ‘Regulation of Australian Agriculture’ Inquiry Report No. 79, 15 November 2016.

Proposed heat stress risk assessment framework

While the live export trade continues, we support a Heat Stress Risk Assessment framework that, at the very least:

- Predicts the likelihood of animals suffering heat stress as opposed to dying from heat stress. If the live export trade is to continue, it must move from frameworks and thresholds focused on mortality to ones focused on animal welfare. As the Panel's draft report acknowledges, great animal suffering can occur without mortality.
- Takes into account the conditions at the export destination as well as on the voyage, in recognition of the fact that animals can also succumb to heat stress at the destination port.
- Is not merely used to determine space allocation, but is used to determine whether a proposed voyage should go ahead in the first place. If the model predicts that animals may suffer heat stress on a voyage or at their destination, the ship should not be permitted to sail.
- Be applied to all live export voyages where heat stress is a possibility, regardless of time of year, the types of animals being transported and destination. For voyages that pass through the equator, heat stress can occur at any time of year.

To the extent the proposed Heat Stress Risk Assessment could still allow shipments to the Middle East during the heat stress period, we note this goes against the advice of the Australian Veterinary Association⁷ and in our view this constitutes an unacceptable animal welfare risk. Historical mortality rates demonstrate that May to October is a particularly dangerous time of year for animals to be exported to the Middle East. While application of the proposed Heat Stress Risk Assessment could possibly reduce animal suffering during this period, we are concerned it will not be sufficient to avoid animals suffering heat stress. Voyages to the Middle East can take two to three weeks and weather forecasts are not sufficiently reliable over this time frame. There cannot be sufficient certainty at the outset of a high-risk voyage that temperatures will not exceed the 'Wet Bulb Temperature related animal welfare limit' during the voyage. If the live export trade is to continue, the recommendations of the Australian Veterinary Association should be followed and shipments to the Middle East during the heat stress period should be banned (unless on board temperature can be controlled with air conditioning).

We thank you again for the opportunity to contribute to the heat stress risk assessment review and we hope that this review will result in genuine improvements to animal welfare in the live export industry while it is permitted to continue.

Yours sincerely



Phil Vernon
Managing Director

⁷ Australian Veterinary Association submission on the 'Heat Stress Risk Assessment (HotStuff): Issues Paper' October 2018.