



4 November 2019

Dr Melissa McEwen  
Principal Regulatory Officer  
Live Animal Exports Division  
Department of Agriculture  
GPO Box 858  
CANBERRA ACT 2601

By email: [MEsheepexports@agriculture.gov.au](mailto:MEsheepexports@agriculture.gov.au)

Dear Dr McEwen

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission on the discussion paper *Middle East sheep exports policy options*.

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, including live export. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

Livestock exports are a major part of the agriculture industry, contributing over \$1 billion in export earnings annually and employing 13,000 mainly regional Australians. Australia's live sheep exports were valued at an average of \$220 million annually over the period 2014-18 in a recent Mercado report, with almost half of the earned revenue being retained on farm<sup>1</sup>. Live export of sheep is particularly important to producers in Western Australia, who account for more than 80 per cent of national trade volume. Mercado reported that the live sheep trade represents nearly 30 per cent of the WA annual sheep and lamb turnoff<sup>1</sup>. The NFF supports a sustainable live sheep export industry that continues to deliver benefits to regional Australia and delivers positive animal welfare outcomes in line with community expectations.

The NFF understands that this discussion paper is the first stage in a Regulation Impact Statement (RIS) process, and that the policy options have been developed taking account of various consultation processes and technical reviews delivered in recent times as well as various sources of technical information. Consistent with the NFF's contribution to previous consultation processes on this issue, we encourage the Department to continue to take a flexible, science and risk-based approach as it moves to develop the RIS options. Consideration should be given to the wider implications of any regulatory change and to the ongoing

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<sup>1</sup>Dagleish M, Agar O, 2019. Value analysis of the Australian live sheep export trade, Mercado report commissioned by LiveCorp and MLA, available at: <http://www.livecorp.com.au/LC/files/bd/bd8739d9-9864-43a0-9b54-4e0d5f4beb8b.pdf>



improvement in industry performance as a result of regulatory change, technological development and industry-led initiatives.

The NFF has consulted its member organisations on the proposed policy options and supports the view of Sheep Producers Australia (SPA) and the Australian Livestock Exporters' Council (ALEC) that the four policy options outlined in the discussion paper are reasonable starting points, but that each would require review as new information – such as animal welfare indicators – and technology become available. Accordingly, we support the development of an Option 5, in line with the rationale outlined in the SPA and ALEC submissions to this process.

The livestock export industry's self-imposed moratorium during June, July and August delivered improved animal welfare outcomes, and demonstrated the industry's commitment to the sustainability of the industry and welfare of the animals in their care. The moratorium, or similar regulator-imposed prohibitions, although capable of delivering desired animal welfare outcomes, are blunt measures that lack flexibility or the ability to drive practice change and innovation. A system that provided flexible commencement dates would incentivise future investment in capability and technology that could lead to further improved animal welfare and commercial outcomes. We support ALEC and SPA's proposal for flexible commencement dates to be applied based on environmental conditions and a revised heat stress risk assessment model that is continually updated as new data and technology become available.

Thank you again for the opportunity to provide a submission to this process. The NFF would be happy to discuss this matter further.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Tony Mahar".

**TONY MAHAR**  
Chief Executive Officer

