

4 November 2019

Melissa McEwen  
Principal Regulatory Officer  
Animal Welfare and Live Animal Exports  
Department of Agriculture

VIA: [haveyoursay.agriculture.gov.au](http://haveyoursay.agriculture.gov.au)

Dear Melissa

**Supplementary submission - 7,707 community submissions on discussion paper**

As the Department is aware, community interest in the welfare of exported animals is extremely high. Government has a core obligation to listen to the community and to take their concerns into account when making significant policy decisions.

Recommendation 1 of the Moss Review recognises this, and calls on the Australian Government to ensure “the Australian Standards for the Export of Livestock are reviewed on a regular basis to reflect industry, scientific and regulatory developments and community expectations concerning live animal exports.” The Department has accepted this recommendation in full.

The Government should ensure that the process for the community to have its say is easy and accessible to all members of the community. In our view, the ‘Have Your Say’ platform does not provide a simple process for the community to provide input to the review process. It requires individuals to register their personal details and set up an account with the platform. This may exclude many concerned members of the community who could have reservations about doing this.

To address these concerns, we offered concerned members of the public the option to authorise RSPCA Australia to convey their comments and concerns to the review process as part of a supplementary submission that we would make. The submissions these community members have asked us to forward on their behalf is **attached.**

In total, 7,707 individuals took up this option. The individual particulars of all of these Australians are outlined in the Excel spreadsheet **attached** to this letter so they can be verified as unique submissions.

We ask that the Department take the views of these individuals into account in determining the conditions for live sheep exports in 2020 and beyond.

Yours sincerely,



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## Text of Australian community submission

*Thank you for the opportunity to provide a submission to the Middle East sheep exports policy options discussion paper.*

*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.*

*None of the options proposed in the discussion paper fulfil this obligation.*

*Based on the scientific evidence presented to the Department in the Independent Technical Committee's Final Heat Stress Risk Assessment Review report (HSRA Report) and the advice of the Australian Veterinary Association, sheep exports to the Middle East should cease from May through to October, inclusive. Additionally, the revised HSRA model as recommended by the Technical Committee should be implemented for every voyage that crosses the equator, at all times of the year.*

*At the very least, Options 2 AND 3 of the discussion paper should be implemented 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 the McCarthy Review, the ASEL Review, and the HSRA Review.*

*Combining Options 2 and 3 would provide certainty to all stakeholders including the industry, trading partners, and the Australian community, and ensure a new approach is taken to heat stress risk assessment that is based on animal welfare, not mortality. Failing to implement the revised HSRA model, a fundamental component of the proposed reforms over the past 18 months, would represent a massive backflip on the Government's commitments to evidence-based policy and animal welfare.*

*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 Governments commitments to the Australian public.*

*Thank you for considering my submission. I look forward to seeing decisive action from the Department that will protect animal welfare for as long as live animal exports continue.*