

Dear Committee,

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

I note in the policy options paper that “the intended outcome of adopting one of these policy options, or a valid alternative, is to manage the risk of heat stress in live sheep exports and welfare outcomes on voyages while supporting a sustainable live sheep export trade.”

The McCarthy Review recommended that Industry move away from risk assessment based on mortality to welfare risk. This was further investigated by the Heat Stress Risk Assessment Technical Reference Panel which recommended “that a wet bulb temperature (WBT) welfare threshold is used as the criterion to limit the risk that exported sheep are exposed to excessive heat load” (Recommendation 1) and that “the heat stress threshold (HST) in the heat stress risk assessment model be applied in conjunction with 98% point on the distribution of deck wet bulb temperature (WBT) probabilities throughout the voyage. As such, a planned voyage would have a 98% probability of WBTs, experienced by sheep, not exceeding the HST.” (Recommendation 4)

It is clear from the above recommendations by the Heat Stress Risk Assessment Technical Reference Panel that a voyage must be contingent on an assessment by a revised Heat Stress Risk Assessment model than what is currently in use by Industry.

The AVA submission to the ASEL Stage 2 Issues paper included an analysis of 509 voyages between 2005 and 2017 of which 51 voyages exceeded 1.5% mortality, where it could be clearly seen that mortalities peaked between May and October. Based on historical climatic data, DAWR mortality investigation reports and Industry research as well as shipboard data, the AVA has stated that ““Irrespective of stocking density, thermoregulatory physiology indicates that sheep on live export voyages to the Middle East during May to October will remain susceptible to heat stress and die due to the expected extreme climatic conditions during this time. Accordingly, voyages carrying live sheep to the Middle East during May to October cannot be recommended.”

Bearing in mind the recommendations of the Government appointed expert panel as well as the scientific assessment by the AVA, as a member of the community who expects high standards of animal welfare, it is completely unacceptable that trade considerations have been prioritised over animal welfare in Options 1 and 4 of the policy options paper.

The period of prohibition of the live export of sheep must be enforced not just for three months as per Option 1 or not at all as per Option 4 but for the period of May to October inclusive and every voyage must proceed only on result of the risk assessment of less than 2% of sheep experiencing Heat Stress Threshold 3 as recommended by the Heat Stress Risk Assessment Technical Reference Panel. It makes a mockery of the deluge of Reviews and their recommendations into live export since the Awassi Express footage was released that Option 1 and Option 4 have been formulated to continue using the existing HSRA model, with current risk settings, and that an inadequate prohibition period and a business as usual model have been included in the policy options.

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 for every shipment throughout the year.

The continuation of this trade is based on the social licence granted by the community and given information in the public domain of historical shipboard mortality and climactic data as well as industry research into the wet bulb temperatures at which sheep will suffer considerable heat stress, the community can no longer abide by the continuing exposure of sheep to climactic conditions that severely undermine their welfare by exporting sheep during May to October and by the lack of implementation of a revised Heat Stress Risk Assessment model to every voyage regardless of the time of year.

Sincerely,

Ruchita Saklani

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