



The veterinary voice in animal welfare

## Middle East sheep exports policy options: Submission by Sentient

Thank you for considering our feedback on The Department of Agriculture's Middle East sheep exports policy options.

As recently as July 2019, Sentient provided feedback on The Department of Agriculture's proposed options for September and October 2019 for the export of sheep to, or through, the Middle East. We are gravely concerned about the Department's newly proposed policy options, three of which would overturn the current prohibition on journeys during the high-risk period from June to the end of September. The general public must also be confused and dismayed as to why the Government has presented this further policy options paper, as there are NO animal welfare grounds for doing so and it clearly does not embrace the science based risk analysis of late; a promise made to the Australian public after the *Awassi Express* disaster was aired on 60 Minutes. We can only surmise that this process has been instituted to appease complaints by exporters of reduced trading months and increased regulatory burden.

We note from the discussion 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."

Sentient submits that these aims are mutually exclusive. It is not financially or environmentally possible to manage the risk of heat stress in live sheep exports, particularly the increased risk during the Middle East summer and be 'sustainable' (noting a definition of sustainable was not given). Even a Government funded trial has found that dehumidification technology cannot reduce temperature or humidity levels sufficiently to prevent heat stress in exported sheep. The 2.2 million dollars that funded this research would have been more efficiently used to develop alternative markets for primary producers, as the analysis since the *Awassi* states the heat stress after unloading from a ship into the Middle East will further animal suffering, and must be considered in the overall chain.

There have been countless reviews into the regulation of this trade. Live sheep exports do not have the support of the Australian public, are not sustainable on animal welfare grounds, are inherently and uncontrollably unstable due to external political/market/environmental reasons, and the trade will struggle to meet new global emissions targets imposed by the International Maritime Organisation as of January 1<sup>st</sup>, 2020, with a contraction of the global carrying capacity predicted. Sentient therefore urges the Department to begin the process of implementing a well-planned phase-out of live sheep exports, and we welcome the opportunity to provide input.

Regarding the four current options presented, please see our commentary as follows:

- 1) Three month prohibition—Conditions under the Middle East Order apply for the northern summer months and industry continue to use the existing HSRA model or agreed animal welfare indicators.**

A 3-month prohibition is inadequate. It is concerning that for this option, "The department seeks feedback from industry on the most appropriate months to be included in the prohibition." There is ample scientific evidence to justify the 2019 prohibition period for the live sheep export trade to the Middle East being

extended from May to the end of October. It should be noted that Option 1 does not even guarantee a 3-month prohibition period, given: “the department could assess the ‘shoulder’ periods of the prohibition on a case by case basis to give consideration to weather forecasts that may significantly differ from historical averages. This may extend or reduce the prohibited period for a given shoulder period.”

The existing HSRA is also inadequate.

The proposal of Option 1 indicates to us the influence of pushback from the live export industry in initiating this review. The Department’s commitment to safeguarding animal welfare is itself questioned by the following admission:

“Option 1 would have minimal further impact on industry. With this option, there remains some risk of a heat stress incident, particularly during the ‘shoulder’ periods of the prohibition.”

- 2) Apply the 2019 prohibition period—Conditions under the Middle East Order apply for the northern summer months. The department would remove the requirement for a HSRA on live sheep export voyages to, or through, the Middle East.**

Also inadequate. The 2019 prohibition period needs to be extended from the beginning of May to the end of October. Outside the prohibition period, sheep always remain at risk of heat stress when exported live, so a HSRA must be a requirement on all voyages to or through the Middle East. If the Department is truly committed to animal welfare, the option to “remove the requirement for a HSRA, reducing the regulatory burden for exporters” should not be proposed.

- 3) Adopt a revised HSRA model with risk settings based on heat stress thresholds or agreed animal welfare indicators.**

We agree with use of the revised (welfare) HSRA model with risk settings based on heat stress thresholds or agreed animal welfare indicators, as recommended by the McCarthy Review, the ASEL Review, and the HSRA Review, but this must be adopted on all voyages to the Middle East, in addition to adopting an extended 2019 prohibition period for 2020 and beyond.

- 4) No prohibition—live sheep exports to, or through the Middle East would be permitted 12 months of the year. Conditions under the Middle East Order apply for the northern summer months and industry continue to use the existing HSRA model.**

It is staggering that option 4 has even been proposed. It fails to acknowledge the reasons why the Department and the Industry itself, instituted a 3-month ban on live exports to the Middle East in 2019, which was based on scientific evidence of heat stress impacts on sheep due to high temperature and humidity levels. Option 4 contains not even the pretence of safeguarding animal welfare, as indicated by the following statement in the discussion paper:

“Option 4 would have the least impact on industry, however, the science and evidence (including historical voyage outcomes) indicates that with this option there is a significant risk of a heat stress incident. The department seeks feedback from industry on how it would manage this risk.”

The live export industry has had decades to manage this risk, and has failed, even following numerous reviews and regulations. Option 4 is a vote to do nothing to safeguard animal welfare.



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In summary, Sentient recommends:

- 1) The valid alternative of a Government commitment to phase out live sheep exports, and a public consultation process to consider how to institute such a phase-out whilst safeguarding animal welfare and allowing primary producers to establish alternative markets and utilise more fully already existing, yet chronically under utilised, onshore processing of sheep in Australia.
- 2) Whilst the live sheep trade continues, we recommend that from 2020, the Department adopts a combination of revised versions of Options 2 and 3 to:
  - continue the 2019 ban on exporting sheep during the highest risk periods for heat stress, (and extend this ban from May until the end of October rather than the end of September), AND
  - apply the new Heat Stress Risk Assessment model, which has been developed by an expert panel, throughout the entire year.

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