

SUBMISSION REGARDING OPTIONS FOR REGULATING LIVE SHEEP EXPORTS

Whilst I do not work in agriculture, I grew up on and around farms. I have worked in abattoirs and been involved in the slaughtering of sheep, pigs and cattle. My father was a stock agent and a butcher and I have helped with transporting animals for slaughter. I therefore do not make these comments with any desire to see farmers stop producing lamb and mutton for consumption. I make these comments because I believe that the transport and slaughter of animals should be done humanely and that all the evidence is clear that the transport of sheep to the Middle East by ship is incapable of being done humanely.

Some of the options have some capacity to improve conditions for the sheep provided they are properly enforced, but none deals adequately with the requirements for humane transport. The only realistic way to ensure humane treatment of sheep being sent for slaughter is for the export of live animals to be stopped entirely.

Apart from the humane aspects, the statistics presented with the proposals also make it clear that this would increase the flow of stock to domestic processing plants which have the capacity. The stopping of the trade will therefore not cause a jump in costs. It would also add to employment in regional areas - an ambition that the government always keeps saying it is keen to promote. Here is an opportunity for them to do something positive for regional areas that will cost them absolutely nothing.

Should the government choose to avoid its responsibilities and allow the trade to continue, they need to bear in mind that the economics of live transport are such that there is an intense, inherent pressure on the shippers to do the minimum necessary for the welfare of their cargo. There is, and always will be, a significant incentive on shippers to cut corners and err on the side of cost reductions over welfare. It is the very nature of the trade. In order for the proposals to deliver even their very modest and clearly inadequate ambitions, there will need to be a significantly enhanced enforcement activity. The placement of vets etc on ships, by itself is clearly inadequate. They have become part of the industry and appear biased towards protecting their jobs over animal welfare. There needs to be significantly better monitoring and enforcement.

Modern technology would easily allow for real time onboard monitoring of the animals and the conditions to be streamed to monitors in Australia in order to ensure that the operations are properly and independently monitored. This would obviate the need for extra people onboard and would allow for proper, independent monitoring and the creation of a reliable record for later auditing. Without monitoring, recording and auditing there can be no comfort that anything will improve.

There is nothing in the proposals to improve enforcement and without better enforcement there can be no confidence that the situation will improve. There should be proper penalties for inadequate performance and the breach of requirements. Financial penalties based on sensible percentages of the transported value need to be imposed - starting from, say, minimum penalties of 25% of the cargo value.

Repeated offences should result in mandatory confiscation of the vessels. There need to be penalties for the masters of the ships which should include custodial penalties, confiscation of ticket (for a period) and fines. There need to be penalties for owners and their directors. These should include custodial penalties. In my experience, there is nothing that focuses directors' mind on the problem at hand like potential custodial sentences, even if these are modest.

A welfare focused levy would also help to focus operators' minds on the problem. Make the payment automatic if they do not do the right thing rather than relying on enforcement. Apart from any fees and charges now in place, transporters should be required to pay a levy of, say, \$150 per head for any sheep that do not complete the journey. Some sheep will undoubtedly die no matter how good the conditions of transport are, so there would always be some modest payment. But a per head levy would provide a strong incentive to minimise this number. The welfare of the animals would get the attention it deserves. Target mortality rates alone are of no value because there is always a reason that can be trotted out to justify any rates above the target.

In summary, the export of live animals should be prohibited. This will be better for the sheep, the farmers and for the local communities.

I also add my support to the submission by the RSPCA.

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