



# Feedback on Middle East sheep exports policy options discussion paper

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## Executive summary

Since 2012, Vets Against Live Export (VALE) has been instrumental in providing science-based analysis of animal welfare issues in live export. VALE's conclusion, supported by recent data and analyses, is that the long-distance sea transport of sheep to the Middle East is inevitably associated with unacceptable animal welfare consequences.

This latest request for submissions<sup>1</sup> is one of many to which VALE has contributed over many years. In VALE's view, the time has come to stop obfuscating. None of these four options is based on science and/or available evidence. At the very least, **live export of sheep to the Middle East should cease during the months between 1 May and 31 October**. Stocking densities for sheep should continue to be calculated allometrically. The unprecedented decrease in mortality at all times of year<sup>2</sup> in response to the increased space allocations is irrefutable evidence for the animal welfare benefit of increased space based on allometric calculations.

The backdrop to all of these inquiries, reviews and reports is that of a trade which a large majority of the Australian public does not want. In April 2018, RSPCA Australia surveyed 1500 respondents, and found that about 75% of Australians want live export (of all species) to end.<sup>3</sup> Furthermore, regardless of justifications that live export fills a religiously-driven need in importing countries, the decline in live sheep exports to the Middle East in recent years has been mirrored by a substantial and continuing growth of the export of sheep meat (mutton and lamb) to those same Middle Eastern markets (Figure 1). It is worth noting that in 2017–18 (before live sheep voyage restrictions), the value of export of sheep meat to the United Arab Emirates alone (\$218 million) was only just less than the total value of live sheep exports to the Middle East during the same period (\$259 million).<sup>4</sup> Saudi Arabia ceased importing live sheep from Australia in 2012, but since then the value of imported sheep and lamb meat has grown to be worth over \$120 million.<sup>5</sup>

Consequently, it is VALE's belief that, rather than wasting substantial amounts of time and money in more inquiries and investigations, the Government should cease propping up live export and devote its efforts to further expanding the already-thriving boxed meat sector. VALE also believes it is time for a proper independent assessment of the actual benefit of the live export sector to Australia, including an assessment of tax income to the country, contrasted with the same parameters regarding the export of boxed lamb and mutton.

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<sup>1</sup> See: <https://haveyoursay.agriculture.gov.au/47315/documents/116896>. Accessed 14 Oct 2019.

<sup>2</sup> See: <http://www.vale.org.au/independent-observer-reports.html>. Accessed 14 Oct 2019.

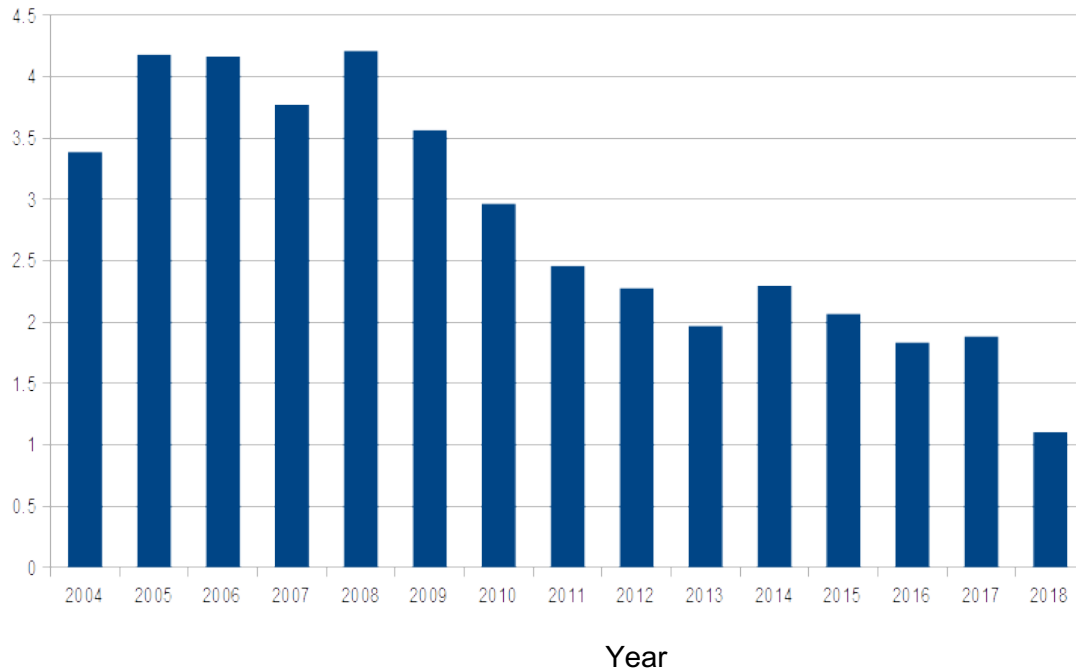
<sup>3</sup> See: <https://www.rspca.org.au/media-centre/news/2018/new-poll-finds-3-4-australians-want-live-export-end-greatest-concern-over>

<sup>4</sup> See: <http://www.agriculture.gov.au/abares/research-topics/agricultural-commodities/commodity-statistics>. Accessed 14 Oct 2019.

<sup>5</sup> See: <http://www.agriculture.gov.au/abares/research-topics/agricultural-commodities/commodity-statistics>. Accessed 14 Oct 2019.

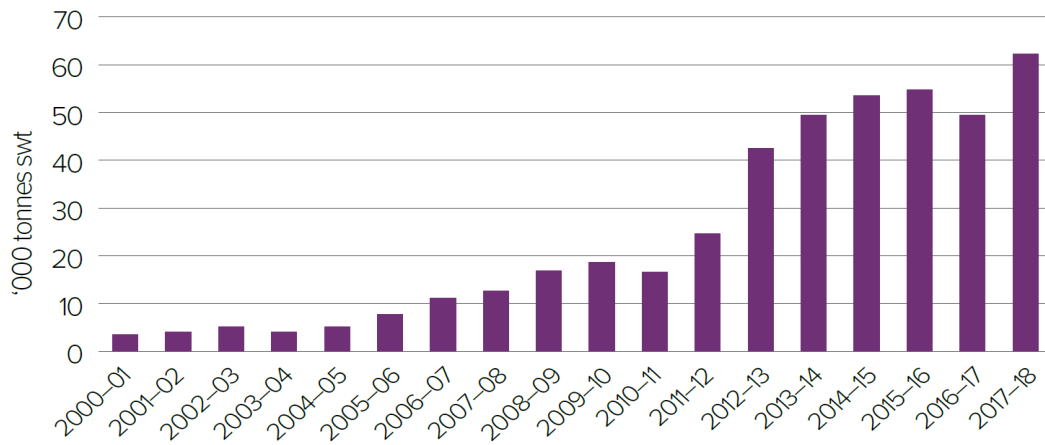
**Figure 1. The decline in live sheep exports**

**A. Numbers of live sheep (millions) exported plotted against year**



**B. The growth of lamb exports to the Middle East<sup>6</sup>**

**Australian chilled lamb exports to MENA\***



Source: DAWR. \*MENA-10.

<sup>6</sup> See: MLA INDUSTRY INSIGHTS Snapshot Sheepmeat MENA October 2018

## TERMS USED IN THIS SUBMISSION

ASEL Review: Review of the Australian Standards for Live Export.  
<http://www.agriculture.gov.au/animal/welfare/export-trade/review-asel>. Accessed 14 Oct 2019.

AVA: Australian Veterinary Association

Carter Review: Monitoring and reporting during livestock export voyages survey  
<https://haveyoursay.agriculture.gov.au/iiglae-review-livestock-export2019>. Accessed 14 Oct 2019

HST: heat stress threshold

Draft Report by the Independent Heat Stress Risk Assessment Technical Reference Panel.  
December 2018  
<https://haveyoursay.agriculture.gov.au/hsra-review>. Accessed 14 Oct 2019.

HSRA: heat stress risk assessment

HSRA Draft Report: Draft Report by the Independent Heat Stress Risk Assessment Technical Reference Panel. December 2018  
<https://haveyoursay.agriculture.gov.au/hsra-review>. Accessed 14 Oct 2019.

HSRA Final Report: Final Report by the Heat Stress Risk Assessment Technical Reference Panel. December 2018  
<https://haveyoursay.agriculture.gov.au/hsra-review>. Accessed 14 Oct 2019.

HSRA (for welfare): as defined in the HSRA Final Report

McCarthy Review: 'Independent review of conditions for the export of sheep to the Middle East during the northern hemisphere summer'. Dr Michael McCarthy (May 2018).  
<http://www.agriculture.gov.au/SiteCollectionDocuments/biosecurity/export/live-animals/mccarthy-report.pdf>. Accessed 14 Oct 2019

Moss Inquiry: 'Review of the regulatory capability and culture of the Department of Agriculture and Water Resources in the regulation of live animal exports' Mr Philip Moss (September 2018)  
<http://www.agriculture.gov.au/animal/welfare/export-trade/independent-review-of-regulation>. Accessed 14 Oct 2019

RSPCA: Royal Society for the Prevention of Cruelty to Animals

The Dept: term denoting The Australian Department of Agriculture regardless of year thus encompassing current acronym (DAWR) and previous acronyms such as DAFF

WBT: wet bulb temperature

# VALE'S FEEDBACK ON THE PROVIDED OPTIONS

## INTRODUCTION

Between 2018 and 2019, VALE made submissions to the ASEL Review<sup>7</sup>, heat stress risk assessment (HSRA) review<sup>8</sup>, HSRA Draft Report<sup>9</sup>, Export of sheep to the Middle East during September and October 2019<sup>10</sup>, the Moss Review<sup>11</sup> and the Carter Review. We were consulted by Dr Mike McCarthy in the preparation of the McCarthy Review, met with Mr Phillip Moss for the Moss Review and met more recently with the Interim Inspector General of Independent Animal Welfare, Mr Ross Carter. Our rigorous scrutiny and provision of all available information for the Independent Observer Voyages has been made public on our website<sup>12</sup> and has been used by other organisations in their assessments of The Dept's regulation of the trade and animal welfare on shipboard voyages.

Given the extent of the reviews performed and the rigorous analysis of the research and voyage data VALE has provided, VALE are disappointed that The Dept has provided these four options for the Middle East Sheep Exports Policy.

It is clear from the four options presented that Government's intentions are to:

- disregard available shipboard evidence (including that available for high mortality voyages<sup>13</sup>, data collected for HotStuff modelling (Maunsell 2003, McCarthy 2005) and that collected by independent observers<sup>14</sup>)
- disregard the Government-appointed technical advisors and advisory groups (McCarthy Review, HSRA Technical Reference Panel)
- disregard independent veterinary advice (AVA, VALE)
- disregard scientific evidence (Caulfield et al 2014, Stockman 2006)
- disrespect community attitudes and expectations (RSPCA poll)<sup>15</sup>
- continue with their disingenuous lack of transparency (Option 3), and
- maintain their consistent support of the live export sheep trade favouring the commercial gain and prosperity of industry and individuals over animal welfare.

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<sup>7</sup> See: <http://www.agriculture.gov.au/animal/welfare/export-trade/review-asel/sea-voyages#submissions-received--draft-report>. Accessed 14 Oct 2019.

<sup>8</sup> See: <https://haveyoursay.agriculture.gov.au/hsra-review>. Accessed 14 Oct 2019.

<sup>9</sup> See: <https://haveyoursay.agriculture.gov.au/sep-oct-2019-sheep-exports>. Accessed 14 Oct 2019.

<sup>10</sup> See: <https://haveyoursay.agriculture.gov.au/sep-oct-2019-sheep-exports>. Accessed 14 Oct 2019.

<sup>11</sup> See: <http://www.agriculture.gov.au/animal/welfare/export-trade/independent-review-of-regulation/submissions>. Accessed 14 Oct 2019.

<sup>12</sup> See: <http://www.vale.org.au/independent-observer-reports.html>. Accessed 14 Oct 2019.

<sup>13</sup> See: <http://www.vale.org.au/high-mortality-voyages.html>. Accessed 14 Oct 2019.

<sup>14</sup> See: <http://www.vale.org.au/independent-observer-reports.html>. Accessed 14 Oct 2019.

<sup>15</sup> See: <https://www.rspca.org.au/media-centre/news/2018/new-poll-finds-3-4-australians-want-live-export-end-greatest-concern-over>. Accessed 14 Oct 2019.

## VALE'S RESPONSE TO QUESTIONS

**Question 1: For each option, what do you consider would be the benefits to and impacts on you, your organisation and the community? Please provide any supporting evidence or data that would aid in the assessment of impacts under each option.**

VALE has clearly identified our evidence-based opinions and preferences in the earlier submissions as listed above and we refer you to these submissions; see also the executive summary.

VALE has highlighted repeated failure of industry in provision of appropriate welfare and health care as well as failure of the Government to regulate this trade. The Dept have consistently ignored available data including published and unpublished scientific studies and observational reports. The options provided in this latest Discussion Paper (October 2019)<sup>16</sup> should have been based on the outcome of the animal welfare assessments and scientific assessments of the industry that have been undertaken in recent years. The Dept seem to be ignoring this and attempting to deflect the discussion to other elements and concerns that should all be secondary to the welfare of the animals. It is telling that the first question prioritises the “impact on individuals and organisations” over animal welfare. One needs to be assured that the welfare of the animals is going to be addressed appropriately with every option.

Options that do not constitute significant deviations from the historical status are clearly and demonstrably not sustainable on welfare grounds. Trying to “maintain” the trade at the expense of animal welfare will only further frustrate and alienate greater proportions of the community against the industry and livestock production generally. In conclusion, VALE believes that implementation of any of these options will heighten negative community perception as it will highlight the reluctance of the Dept to implement the advice of its own advisory groups and diminish trust in Australian livestock production.

It should be noted that none of the options have any benefit to VALE or impact on VALE. VALE will continue to amass data, analyse the data and put this data in the public domain regardless of outcome.

**Question 2: Is there a policy option not stated here that would both support a sustainable live sheep export trade and meet the high animal welfare standards expected by the Australian community?**

No definition of “sustainable” is provided. VALE has made the assumption that the term refers to commercial profitability assuming no trade disruptions due to negative media publicity. VALE is of the evidence-based opinion that commercial profitability of this trade is not compatible with high animal welfare standards.

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<sup>16</sup> See: <https://haveyoursay.agriculture.gov.au/47315/documents/116896>. Accessed 14 October 2019.

There are numerous policies that are not stated or incorporated in the four options presented in the discussion paper. In order of preference, VALE's four options (none of which have been provided) would be:

- I. Sheep should not be exported to the Middle East, based on voyage conditions, end-destination weather conditions and repeated end destination ESCAS/slaughter issues. VALE appreciates that this option would not support a "sustainable" live sheep trade but we consider that this part of the 'sheepmeat' trade is insignificant relative to the boxed sheepmeat trade, and that it competes directly with the boxed sheepmeat trade (see executive summary). In addition, continuation of the live sheep export trade risks reputational damage to the Australian livestock industry.
- II. Sheep should not be exported between 1 May and 31 October based on scientific and meteorological data (AVA 2018, AVA 2019a and 2019b), and the revised HSRA (for welfare) should be adopted for the other months of the year.
- III. Apply the 2019 prohibition period (Conditions under the Middle East Order apply for the northern summer months) PLUS adopt the revised HSRA (for welfare) for the other months of the year.
- IV. Adopt the revised HSRA model (for welfare) immediately, with the recommended risk settings AND following the recommendation that conditions at the end destination be considered for all shipments.

For all options, VALE requires more stringent regulations including completely revised laws as per VALE's submission<sup>17</sup> to the Moss Review. The present law is inadequate to achieve good animal welfare in the sections of the trade which may continue, and should be reviewed and completely rewritten. In particular, the law should include a power allowing the independent regulatory body to impose on-the-spot penalties for breaches of relevant law. Currently, breach of live export licence conditions can only be penalised after a criminal prosecution.

**Question 3: The department is developing an information base to support ongoing analysis and improvements to live animal export regulation. This includes environmental data collected on board live export voyages. What other data should the department consider collecting?**

VALE is aware that The Dept has at least 15 years of information they could analyse and yet have never done so. The HSRA itself was modelled from observational shipboard data (Maunsell 2003) and onboard monitoring continued at least to 2005 (McCarthy 2005). Shipboard monitoring has had near-continuous funding by Government (MLA funded research studies) including a project to insert rumen temperature loggers in sheep on voyages to the Middle East (Livecorp and MLA 2018, Norman 2015, Norman 2016, Norman 2017) and that data has never been published despite reported completion of the project (Livecorp and MLA 2018). In addition, VALE believes that the data collected in the last 18 months alone by the

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<sup>17</sup> See: <http://www.agriculture.gov.au/animal/welfare/export-trade/independent-review-of-regulation/submissions>. Accessed 14 Oct 2019.

independent observers<sup>18</sup> would be sufficient evidence for trade cessation from May to October (and likely other months also) on the grounds of unacceptable, unavoidable and prolonged heat stress. The AVA's Heat Stress Submission (AVA 2019a) recommended that sheep should never be exposed to conditions that result in Heat Stress 3 (open mouth panting) yet open mouth panting is noted in a proportion of sheep on nearly every independent observer report. The AVA Submission (AVA 2019a) also recommended that sheep should never be exposed to more than three days of Heat Stress 2.

The Dept has adequate evidence of heat stress and mild to severe heat load in the majority of independent observer reports but persistently refuses to analyse this data closely, publicise it or draw the obvious conclusions.

## **VALE'S ASSESSMENT OF THE FOUR OPTIONS**

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

**COMMENT:** The existing HSRA model (for mortality) has been shown to be unacceptable by McCarthy (McCarthy Review), AVA, VALE and the Government's HSRA Technical Reference Panel. There is no definition of "agreed animal welfare indicators" (see Option 3). This option is unacceptable.

**Option 2:** Apply the 2019 prohibition period – Conditions under the Middle East Order apply for the northern summer months. The Dept would remove the requirement for an HSRA on live sheep export voyages to, or through, the Middle East.

**COMMENT:** This option prohibits the highest number of voyages during the high-risk months, albeit the restriction does not fully cover the high-risk period identified by the AVA (AVA 2018, AVA 2019a) and VALE. However, to continue with the existing HSRA model (for mortality) for the remaining months is unacceptable (as per Option 1).

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

**COMMENT:** Option 3 should have been the best welfare option as it has involved a Government review process with industry and community consultation that resulted in new recommendations by the appointed HSRA Technical Reference Panel. VALE notes that that final recommendations of the Technical Reference Panel involved a backflip from the draft recommendations (i.e. essentially a wet bulb temperature (WBT) one degree Celcius higher than the Heat Stress Threshold (HST) for a standard shipper identified in the HSRA Draft Report) and references HotStuff 4 rather than the updated Hotstuff 5 (Stacey 2017 a and b). Nonetheless, given that this was a long and considered review process, the recommendations

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<sup>18</sup> See: <http://www.vale.org.au/independent-observer-reports.html>. Accessed 14 Oct 2019.



of the HSRA Technical Reference Panel should have been accepted by The Dept. The fact that they haven't been (thus entailing yet another submission) and that their recommendations weren't even provided as an Option indicates a disregard of animal welfare and also 'due process' by The Dept. To then include the clause "or agreed animal welfare indicators" (agreed by whom and on what basis?) highlights the Government's unwillingness to support the science or 'due process' in addition to being quite deceptive. No veterinary organisation that has assessed this trade or had to deal repeatedly with The Dept could endorse inclusion of a vague, unspecified assessment parameter which could change at any time without independent assessment, scientific validation or community consultation.

**Option 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 continues to use the existing HSRA model.

**COMMENT:** This is clearly unacceptable on animal welfare grounds as acknowledged by the option description itself. The poor animal welfare that occurred due to this option led to the initial McCarthy Review and all subsequent reviews. This option should not have been included and should not be considered by The Dept.

#### **Options 1–4 conclusion**

In conclusion, none of the four options presented reflects sufficient attention to the welfare considerations of the animals involved. There are major welfare deficiencies in each of the options that preclude selection of a best welfare option. Option 2 is the only option of the four that will guarantee some well-defined improvement in animal welfare. However, the compromised animal welfare that will occur with all four options means that none can be supported by VALE. VALE's preferred options are articulated in our response to Question 2.

#### **REFERENCES**

AVA (2019a). AVA Submission: Response to the Draft Report by the Heat Stress Risk Assessment (HotStuff) Technical Reference Panel. 1 March 2019

AVA (2019b). Proposals and Conditions for Live Sheep Exports during the Northern Hemisphere Summer. Submission from the Australian Veterinary Association Ltd.

AVA (2018). A short review of space allocation on live export ships and body temperature regulation in sheep. May 2018. Submission

Caulfield MP, Cambridge H, Foster SF, McGreevy P (2014). Heat stress: A major contributor to poor animal welfare associated with long haul live export voyages. *The Veterinary Journal* 199:223-228

Maunsell Australia (2003). Development of a heat stress risk management model. LIVE.116. Meat and Livestock Australia, North Sydney, NSW, Australia

McCarthy M (2005) Pilot Monitoring of shipboard environmental conditions and animal performance. LIVE.223. Meat and Livestock Australia Limited, Sydney, NSW Australia 2005

Live Corp and MLA (2018) Research Development and Extension Spring 2018.

Norman GJ (2017) National livestock export industry sheep, cattle and goat transport performance report 2016. W. LIV.0291. Meat & Livestock Australia Limited, Sydney, NSW Australia

Norman GJ (2016) National livestock export industry sheep, cattle and goat transport performance report 2015. W. LIV.0291. Meat & Livestock Australia Limited, Sydney, NSW Australia

Norman GJ (2015) National livestock export industry sheep, cattle and goat transport performance report 2014. W. LIV.0291. Meat & Livestock Australia Limited, Sydney, NSW Australia

Stacey, C (2017a) HotStuff V5 – Improvements to the Live Export Heat Stress Risk Assessment Method (W.LIV.0277). Prepared by Stacey Agnew Pty Ltd for MLA/LiveCorp

Stacey, C (2017b) HotStuff V5 Addendum – Calculations within the Live Export Heat Stress Risk Assessment Method (W.LIV.0277). Prepared by Stacey Agnew Pty Ltd for MLA/LiveCorp

Stacey, C (2011) HotStuff V4 Improvements to the Live Export Heat Stress Risk Assessment Method (W.LIV.0277). Prepared by Stacey Agnew Pty Ltd for MLA/LiveCorp

Stockman CA (2006) The physiological and behavioural responses of sheep exposed to heat load within intensive sheep industries. Thesis, Doctor of Philosophy, Murdoch University