



WORLD ANIMAL PROTECTION AUSTRALIA

SUBMISSION

DEPARTMENT OF AGRICULTURE

Submission on policy options for live sheep exports to the Middle East

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Introduction

World Animal Protection welcomes the invitation to provide input to the Department of Agriculture's policy options on live sheep exports to the Middle East.

At the outset we wish to make it clear that World Animal Protection does not support the live export of animals for slaughter overseas. It is a cruel trade that causes intense and avoidable animal suffering. We advocate that Australian animals should be slaughtered domestically, as close to the point of production as possible, and that the live export trade should transition to a chilled, boxed meat and carcase only trade. We would like to see a formal ban considered as an alternative policy option.

Whilst that is our preferred option, we would also like the opportunity to provide feedback on the existing options that have been included in the discussion paper. It is in this context that we contribute to the Department's review of policy options on live sheep exports to the Middle East. Our input will focus on options two and three: Applying the 2019 prohibition period and adopting a revised Heat Stress Risk Assessment (HRSA) model based on heat stress thresholds or agreed welfare indicators.

Option Two The issue – Heat Stress

Heat stress has been identified as a significant factor in the deaths of thousands of sheep during live export voyages.¹ According to a Pegasus Economics Report, the contributing factors to heat stress in voyages from Australia to the Middle East include, among others:

- High temperature and humidity;
- Reduced variation in circadian temperature²

The high temperatures during the Northern Summer months clearly exacerbate these two factors in heat stress. 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. Findings from the earlier consultation period clearly indicate that the mortality rate for September is still above average.³ Furthermore, Figure 2. through to Figure 4. wet bulb temperature graphs indicate

¹ Malcolm Caulfield et al, 'Heat stress: A major contributor to poor animal welfare associated with long-haul live export voyages' (2014) 199 *The Veterinary Journal* 223, 223.

² Alistair Davey and Roger Fisher, 'Economic issues associated with the West Australian Live Sheep Export Trade' (2018) *Pegasus Economics*, 1.

³ Department of Agriculture, 'Proposed Conditions for Live Sheep Exports to the Middle East during September and October' (2019), 2.



that the temperatures on board live export ships are still very high during the month of September.⁴

Sheep from Australia are acclimatised to cooler temperatures during the months of September and October and transporting them to the Middle East during these months is detrimental to their welfare.

Previous incidents of mass sheep deaths have occurred during the month of September, including the deaths of 4,050 sheep as they were offloaded from Bader III in Qatar on the 7th of September in 2013.⁵

These factors make it untenable from an animal welfare perspective for the export of sheep to the Middle East to occur during the summer months. It would be an alarming step backwards for the Department to overturn the ban on Live Exports during these months. The temporary position agreed upon for 2019 should be applied as a standard rule extending the prohibition on transport during the northern summer.

Option Three

The issue – Animal Welfare indicators

Applying Option Three to exports during the remaining months of the year would ensure a new approach is taken to heat stress risk assessment that is based on animal welfare, not mortality. The current approach whereby a determination is made based on whether there is a 2% chance of a 5% mortality event fails to recognise the suffering animals may endure on these voyages even if they survive. The final report by the Heat Stress Risk Assessment Technical Reference Panel relied heavily on the recommendations in the McCarthy review in outlining why the assessment model needs to change. The report held that 'mortality is an insufficient indicator of animal health and welfare, given that animals may suffer and have reduced welfare without actually dying.'⁶

Although we support a welfare based risk assessment model, we would urge the Department to ensure that independent oversight in the form of on board observers continues. This would help to mitigate the risk posed by human error in the inputting of temperature data and welfare indicators. The final report discussed the option of using a panting score as an indicator of welfare, however, the report did recognise that it was dependent on human accuracy and that there could be some limitations in objectively applying this welfare measure.⁷ Ensuring

⁴ Ibid, 3.

⁵ RSPCA, The gruesome history of the Bader III live export ship - which docks at Port Adelaide this week: <https://www.rspcasa.org.au/live-export-bader-ship/>

⁶ Department of Agriculture, 'Final report by the Heat Stress Risk Assessment Technical Reference Panel' (May 2019), 6.

⁷ Ibid, 14-15.



independent observers were present should help ensure the objectivity of welfare measures recorded on board.

Recommendation

Both Option Two and Option Three should be adopted by the Department. Option Two would see the prohibition on live export during the northern summer adopted beyond 2019. Given the serious risks outlined above this is an essential component of mitigating the risks associated with live export. Any of the options that do not include this prohibition are untenable and would be a step backwards for the Department. Option Three would ensure a new approach is taken to heat stress risk assessment that is based on animal welfare, not mortality. This would need to be combined with the continuation of on board independent observers to minimise the risk of human error in recording both temperature and welfare indicators.

However, as indicated at the start, we stand with other animal welfare organisations in our belief that these options still do not go far enough. We continue to advocate for a complete end to the live sheep export industry in favour of the chilled and frozen meat trade. Independent research shows that this more humane alternative will protect Australian farmers, the economy and create new jobs.⁸ This alternative is achievable and consistent with the responsibilities of government.

Conclusion

World Animal Protection acknowledges the intent behind Policy Options for Live Sheep Exports to the Middle East. We believe it is essential that, at the very least, Options Two and Three are adopted by Australia's Agriculture Minister. However, it is clear on the evidence that live export remains a cruel trade, one that in our opinion, is not compatible with the values and public morals of many Australians.

We would be happy to discuss our submission further.

Yours sincerely,

Simone Clarke
Executive Director, World Animal Protection Australia

A handwritten signature in black ink, appearing to read "Simone Clarke".

⁸ Market Vision, 'Live, Chilled and Frozen meat (sheep) trade, GCC' (2011), 7-8.