

Submission Re: The Phase Out of Live Sheep Export by sea.

23/5/2023

My name is [REDACTED] I am a registered Veterinary Surgeon in the state of Victoria, a long-standing advocate for animal welfare and for responsible considered and respectful care of animals be they domestic, wild, native, or introduced. Indeed, I am a recipient of the Order of Australia Medal (OAM) for contribution to animal welfare and veterinary services over many decades through the RSPCA. I am a member of the Australian Veterinary Association and although i am still involved with advocacy through community and professional organisations this submission is made on my own behalf and not that of any organisations I am involved with.

I very much welcome the phase out and would like to add the following comments.

1. I understand that labour Government commitment is to start the phase out during their second term in-office. I would like to see an earlier possible start to the phase out to ensure that the minimum number of sheep are subjected to conditions which lead to compromised welfare inherent in this trade.
2. I would like to call for a phase out program of no longer then 2 years on the following basis:
 - a. New Zealand was able to achieve a phase out in two years,
 - b. The live sheep export trade and infrastructure is predominantly concentrated in WA thus simplifying the strategic and organised transition that can be achieved whereby assistance and support can be relatively easily focused, at least geographically.
 - c. Should the phase out occur over a longer period, it is likely that, investment in infrastructure, capacity, maintenance and skills will decline, thus leading to further and longer compromised welfare and health for the exported sheep involved.
 - d. The live sheep export industry has been on the decline for many years (more then 10 years) and in the last 3 years was reduced from 2 million to 1 million to 500,000 sheep/year in last year.
3. It is extremely important that during the phase out period animal welfare monitoring, auditing and reporting be maintained or indeed increased specifically to overcome the likely decreases in skill, capacity and infrastructure operational maintenance. Note:
 - a. Independent observers (IOs) should be placed on every voyage during the phase out to help provide assurance that independent monitoring is being conducted and reported. It is essential that the IOs are effectively trained in terms of sheep behaviour, animal welfare signs (ie. heat stress etc), high risk areas on the ship and consistent reporting protocol.
 - b. All regulatory provisions, assessment, restrictions, and certifications currently in place for the live sheep export must be maintained until the phase out period commences and throughout the phase out period.
 - c. While the trade continues there should be no further reduction in the length of the current summer ban.
 - d. Key critical animal welfare risks limits should be set (ie. not just mortality rates) and a more comprehensive reporting be undertaken during the phase out to provide the additional safeguards and transparency regarding welfare of the involved animals.
4. I would have liked to see the critical recommendations from an Australian Veterinary Association (AVA) submission (2018) incorporated to the critical limits. They are significant and very valid recommendations including the following which are still very relevant today and going forward through the phase out period.
 - *Trucks delivering sheep for export must be weighed dockside at embarkation, so total sheep weight can be allocated to total deck area. No more sheep should be loaded onto the ship when total space has been allocated.*

- *Space allocation per animal must be based on allometric principles and increased by at least 30% for sheep that weigh 40 to 60 kg (based on a k-value of 0.033). The typical sheep sent to the Middle East is an adult Merino wether in this weight range. This increase in space ($k = 0.033$) is the minimum amount needed to alleviate adverse welfare outcomes, and must be implemented across all body weights and all months of the year.*

- *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.*

5. It is important to establish clear targets for the phase out period and monitor the reduction in number of the live sheep exported by sea as well as the increase in sheep slaughter for domestic and particularly for the export market of chilled and frozen meat. Commercial, financial as well as animal welfare indicators (KPI) should be set up to help guide the phase out period and to provide clear and transparent indication of progress and achievements.

REFERENCE

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

Thanks

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