

Phase out of live sheep export by sea: response to consultation paper

Introduction

I am a veterinarian with good knowledge of the live sheep export trade, and particular expertise in animal welfare: I have conducted research and published on the topic of humane stunning methods, and have attained Membership by examination of the Australian and New Zealand College of Veterinary Scientists (ANZCVS) in animal welfare science.

I am writing this submission in conjunction with a veterinary colleague who also has good knowledge of the live sheep export trade, has particular expertise in small ruminants and has attained Membership by examination of ANZCVS in ruminant nutrition.

We have conducted extensive personal research on the animal welfare issues associated with live export, particularly in relation to export of sheep from Australia to the Middle East.

We strongly support the decision to phase-out the live export of sheep by sea, as this trade cannot be conducted in a humane manner. It inherently leads to unacceptable animal welfare conditions, both on board ship (including heat stress, inanition, injuries, noxious environmental stimuli) and in the destination markets (heat stress, slaughter without stunning, breaches of ESCAS).

We urge the panel to recommend the cessation of this trade as soon as possible.

We have addressed the consultation questions as follows.

Mechanism

The government needs to legislate this decision, including an end date, to provide certainty to all affected parties and the community. This needs to occur within this current term of parliament, to ensure this progressive and sensible policy decision cannot be derailed.

Timeframe

Given the conditions on board ships and at the destinations, we firmly believe this phase-out should commence immediately once legislation is in place, with a view to as rapid a phase out as possible, ideally within 2 years. There is no advantage to delaying for any significant length of time. While it is acknowledged that local processing capacity in WA needs to be increased¹, this is more of a workforce issue than a lack of processing infrastructure. New Zealand successfully achieved a phase-out of a much more substantial live cattle trade within 2 years. Australia's live sheep trade has already reduced by over 90% in the last decade, so a much shorter phase-out period should be possible in this case. It needs only be sufficient time for workforce capacity in the local WA processing sector to be optimised, and for farmers to transition to local opportunities (domestic supply, export chilled and frozen meat markets).

Impact and adjustment

Impact on veterinarians

Veterinarians who work as part of the live export industry are unlikely to be significantly affected by the relative speed of the phase-out. Data from 2014 shows that at that time, very few veterinarians did more than one voyage annually (Questions to Senate Estimates, May 2015 Q109)², and at that stage there were 4 times as many sheep being exported compared with now (see Figure 1). At that time, just 3 out of 64 eligible veterinarians were accompanying voyages on a regular basis. In addition, many live export veterinarians also work in cattle export and a range of other clinical areas which will be unaffected by the phaseout. There is currently a veterinary shortage, especially in rural areas, so there is no shortage of alternate work. As such, the impact of the speed of phase-out should be minimal for production animal veterinarians and the veterinary profession as a whole.

¹ See: <https://www.abc.net.au/news/rural/2023-05-01/abattoir-plans-to-build-worker-camp-and-expand-operations/102279974>

² See: https://www.aph.gov.au/Parliamentary_Business/Senate_Estimates/rtratcte/estimates/bud1516/ag/index

Impact on WA sheep producers

Figure 1 and Table 1 demonstrate that this industry has been phasing itself out for the last 2 decades. The majority of sheep producers in WA have already exited the market, and the remainder should now be preparing to transition to other opportunities. Australian agriculture has already evolved away from live sheep export in eastern Australia. These farmers have modified their farming models and moved into the chilled and frozen meat trade, which has grown exponentially, and is the obvious opportunity for WA sheep producers to embrace.

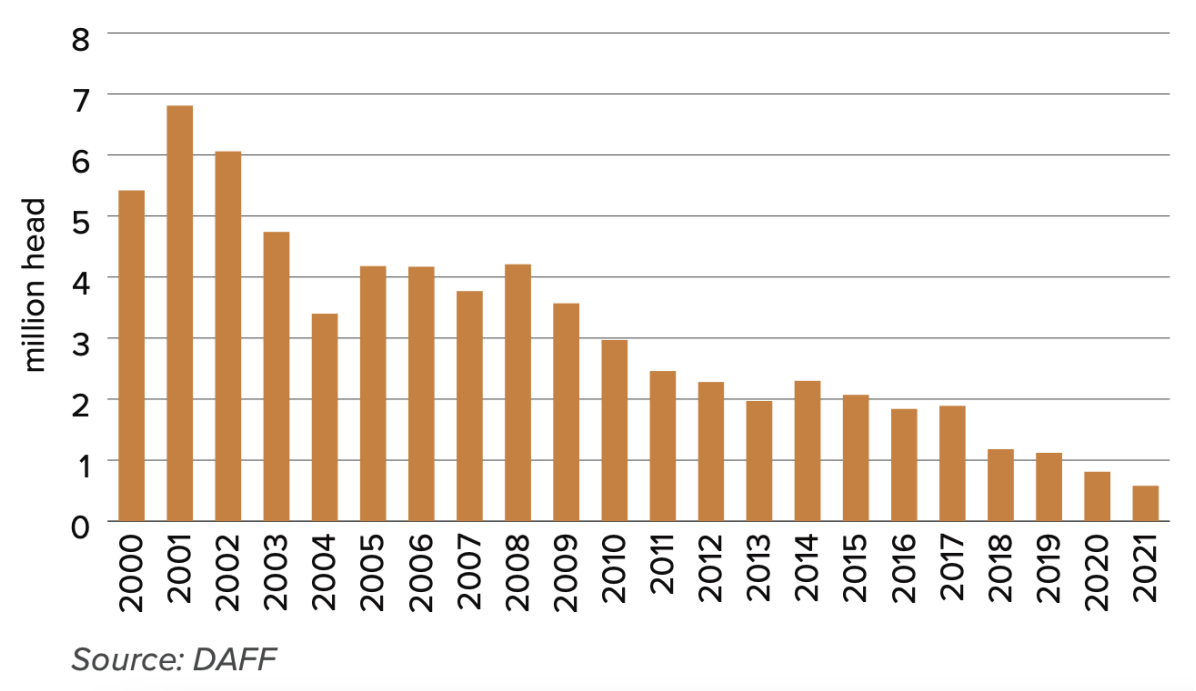


Figure 1. Australian live sheep exports (source: Figure 65 MLA State of the Industry Report 2022 source: https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/trends--analysis/soti-report/2879-mla-state-of-industry-report-2022_d6_low-res_spreads.pdf?%20Livestock%20Australia&dm_i=4PKB).

Table 1. Number of voyages to or through the Middle East (excluding Russia), by month of voyage commencement, between 2018 and 2022 (source: <https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/live-animal-export-statistics/reports-to-parliament>).

	2018	2019	2020	2021	2022
January	3	3	2	2	2
February	2	3	1	0	2
March	3	2	3	4	1
April	3	2	2	2	2
May	3	3	2	4	1
June	2		1		
July					
August					
September	1	1	1	2	0
October	0	2	0	2	1
November	3	1	1	0	1
December	3	3	4	2	0
Annual total voyages	23	20	17	18	10
Annual total sheep	1,115,966	1060274	879555	905965	379870

Other employees in the live sheep export sector, such as truck drivers, have the capacity to carry other freight as there is a dearth of truck drivers in Western Australia.³ There is a shortage of agricultural workers across Australia.⁴

Impact on animals

The phase-out needs to be completed as swiftly as possible, to ultimately reduce the number of sheep that will be subjected to weeks at sea (between 2018-2022 there were 88 voyages to/through the Middle East that averaged 22 days, and ranged from 16-31 days)⁵ followed by slaughter without prior stunning.

During the phase-out period, shipping companies are unlikely to invest in maintaining infrastructure onboard, and may struggle to retain skilled stockpersons. Australian Government Accredited Veterinarians (AAVs) have previously reported infrastructure issues in need of attention on board ships which lead to animals being injured or unable to access feed and water, and the response has been slow or non-existent, even when the trade was fully operational. With the pending cessation of the trade, exporters are even less likely to spend money to attend to these infrastructure problems.

In April 2023, the Inspector General of Live Animal Exports reported⁶ that the antecedent reduction in resourcing and capability that preceded the MV *Awassi Express* incident represented depreciation of the underlying capital asset of regulatory capability and capacity. The Inspector General noted that there are currently insufficient funds for adequate regulatory capability and capacity in live export and the Department of Agriculture will not be able to move towards better regulatory practice in the medium term. This has substantial implications for animal welfare, and is another reason why the phaseout should be as swift as possible.

During the phase-out period, it is essential that conditions on board ships do not deteriorate:

1. **Stocking densities:** exporters may be tempted to load as many sheep as possible in the remaining voyages carrying sheep to/through the Middle East. It is recommended that additional precautions are put in place to prevent this. Currently, weighing trucks is only done at exporter weighbridges and not at the dock, so this is not independently verified. [In their review in 2018](#), the AVA recommended that “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” (AVA, 2018). This would ensure loaded sheep numbers and weights are more closely scrutinised.

The AVA also recommended that *“space allocation per animal must be based on a k-value of 0.033. This k value is the minimum amount needed to alleviate adverse welfare outcomes, and must be implemented across all body weights and all months of the year.”* We know that mortality rates have decreased since industry was forced to increase space allocation per animal in 2018 so that sheep could more readily reach feed and water troughs, and simultaneously lie down to rest during voyages. It is essential that any improvements like this are not eroded during the phase-out. Indeed, the current space allowance between November and April ($k=0.030$) is still lower than that recommended by the AVA, and should be increased in line with the AVA recommendation for the period of the phaseout, given we know animals will still suffer significant heat stress (and some will die: 12,264 sheep have died during voyages from 2018-2022) at current stocking densities. Between 2018 and 2020, there were 41 voyages carrying sheep to/through the Middle East, and sheep on 37 of the voyages exhibited heat stress (Figure 2).⁷

³ See: <https://www.abc.net.au/news/2023-05-17/truck-driver-shortage-crippling-regional-businesses/102351508>

⁴ See: <https://www.abc.net.au/news/rural/2023-05-17/calls-to-revitalise-ag-education-amid-worker-shortage/102347770>

⁵ See: <https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/live-animal-export-statistics/reports-to-parliament>

⁶ <https://www.iglae.gov.au/sites/default/files/2023-04/communication-and-engagement-in-livestock-export-regulation.pdf>

⁷ See: https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/regulatory-framework/independent-observer-reports#_2023

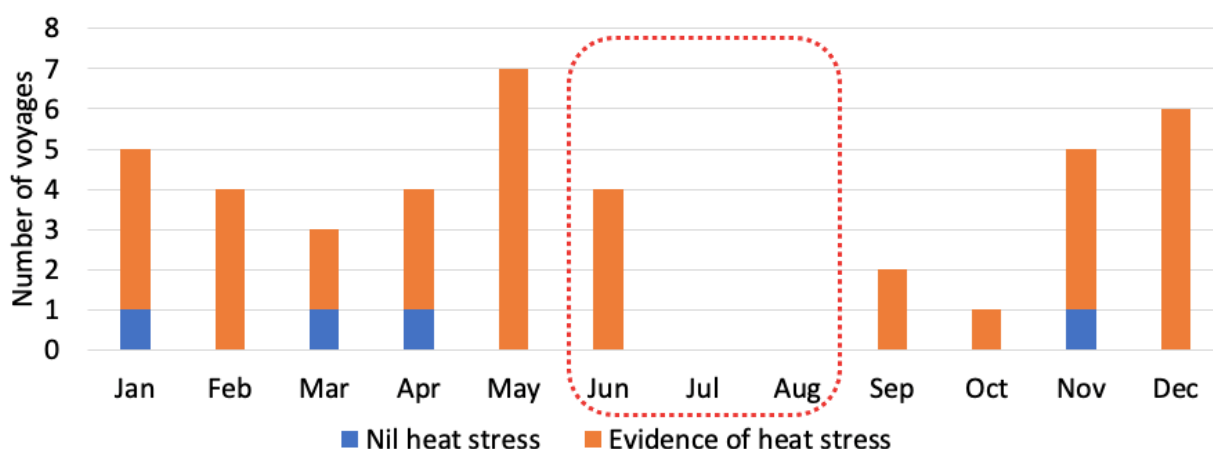


Figure 2. Evidence of heat stress in sheep from Independent Observer Report Summaries 2018-2020 (n=41; source https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/regulatory-framework/independent-observer-reports#_2023).

2. **Summer ban:** it is essential that the summer prohibition period remains in place and indeed should be extended in line with AVA recommendations: *“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.”*

The AVA assessment of the risks from the beginning of May to the end of October has been proven correct: the result of the summer prohibitions (late-May to mid-September) has seen a significant reduction in mortality. However, it is still clear that the months of May (in particular) and into October also carry increased risk, based on IO report summaries from 2018 to 2020. It is strongly recommended that the prohibition period should be extended in line with AVA recommendations to include all voyages from May to October, during the phase-out period.

Local processing

Capacity needs to be sufficient in WA to allow local processing of sheep that would have ordinarily been exported. We know that the annual number of sheep exported has reduced from 6.5 million to 0.5 million. The government is urged to implement immediate incentives to boost the local abattoir workforce as needed, to enable local processing of those remaining numbers.

Though not ideal, and as a very interim measure, consideration could be given to transporting sheep by road to South Australia for processing, until local WA capacity is sufficient. The risks and benefits would need to be assessed, however road transport (over several days) would be preferable to spending many weeks at sea. It would also mean the sheep will be slaughtered under Australian conditions, including pre-slaughter stunning.

At the end of the phase-out period there needs to be sufficient workforce capacity to process all sheep locally within WA.

Opportunities

The industry can look to the learnings from farmers in the eastern states that have exited the sheep live export trade and optimised sheep welfare by slaughtering their stock closer to their farm gates, in line with the AVA policy on live animal export.⁸ Clearly there is a expanding chilled and frozen meat market which is already worth many multiples of the live export trade in dollars, and creates jobs locally; this should be embraced by the remaining WA sheep farmers who have not already transitioned away from live export. There is potential for further growth in this sector, and the government should focus on trade deals which will enhance these opportunities.

⁸ See: <https://www.ava.com.au/policy-advocacy/policies/miscellaneous-welfare-issues-animal-export/live-animal-export/>

The timely cessation of the sheep export trade is also an opportunity for Australia to protect our reputation and show leadership on a fraught animal welfare issue. This aligns well with the current federal government's commitment to a renewal of the Australian Animal Welfare Strategy.

References:

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