

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

Introduction

I am a veterinarian with good knowledge of the live sheep export trade I have conducted extensive personal research on the issue of live export.

I 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 gives rise to unacceptable animal welfare conditions, both on board ship (including heat stress, inanition, injuries) as well as in the destination markets (heat stress, slaughter without stunning).

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

I 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 soon, and absolutely within this current term of parliament, to ensure this policy decision cannot be derailed.

Timeframe

Given the conditions on board ships and at the destinations, I firmly believe this phase-out should commence immediately once legislation is in place, with a view to as rapid a phase out as possible. I do not see an advantage to delaying for any significant length of time. While it is acknowledged that local processing capacity in WA needs to be increased, 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%, so a much shorter phase-out period should be possible in our 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

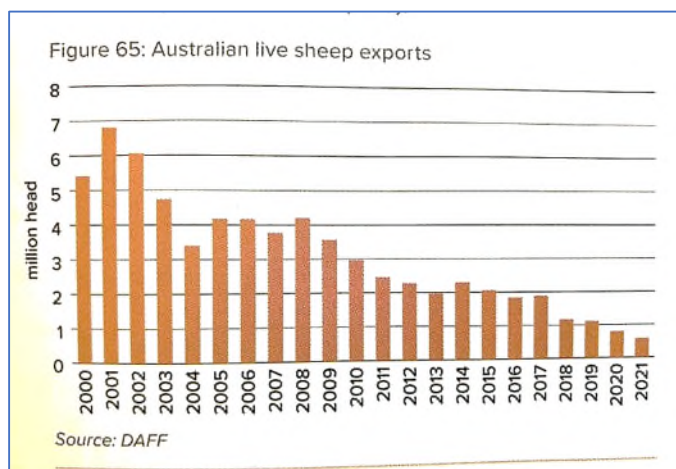
Impact on veterinarians

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)¹, and at that stage there were 4 times as many sheep being exported compared with now (see figure below). 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 will be minimal for the veterinary profession as a whole and for production animal veterinarians specifically.

Impact on WA sheep producers

This industry has essentially been phasing itself out for the last 2 decades (figure below). 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 export in the east, and is over 90% there in WA. The chilled and frozen meat trade has grown exponentially, and is the obvious opportunity for WA sheep producers to embrace.

¹ See: https://www.aph.gov.au/Parliamentary_Business/Senate_Estimates/rtratcte/estimates/bud1516/ag/index



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 and unstunned slaughter.

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

In April 2023, the Inspector General of Live Animal Exports reported² 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 seasons. 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 reasonably accurate.

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, and it is essential that any improvements like this are not eroded during the phase-out. Indeed, the current space allowance is 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) at current stocking densities.

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 between May and October has been proven correct: the result of the summer prohibition (June to September) has been a significant reduction in mortality. However it is still clear that the

² <https://www.iglae.gov.au/sites/default/files/2023-04/communication-and-engagement-in-livestock-export-regulation.pdf>

months of May (in particular) and October also carry increased risk, based on IO report summaries from 2018 to 2020. I recommend that the prohibition period should be extended in line with AVA recommendations to include May and October, during the phase-out period.

Local processing

Capacity needs to improve 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 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 stunning. Perhaps some government incentives can be provided and assistance with logistics of transport and spelling at required intervals to ensure appropriate welfare is maintained.

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 the eastern states that have exited the sheep live export trade. Clearly there is a burgeoning 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 here, and the government should focus on trade deals which will enhance these opportunities.

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 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](#)
