

Phase out of live sheep exports by sea

Submission of the
Australian Veterinary Association Ltd

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The Australian Veterinary Association

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock, and wildlife. Government veterinarians work with our animal health, public health, and quarantine systems while other members work in industry, research, and teaching. Veterinary students are also members of the Association.

Executive Summary

The AVA thanks the independent panel for the opportunity to comment on this important issue. The AVA has a broad membership. Some members have welcomed the phase out of live sheep exports, while others do not support the policy. The comments put forward are based on the areas where there is consensus of opinion.

Broadly, the AVA is of the opinion that during the phase out and after the trade has ceased there must be no impact to the health and welfare outcomes of the sheep industry. We are also of the opinion that the viability of rural communities must be a priority in the phase out, including the viability of veterinary businesses and acknowledge the importance they play in maintaining livestock production systems through biosecurity and animal health and welfare measures.

We have addressed specific questions asked in the consultation paper under the headings below.

Introduction

Sheep farming is an integral part of our agricultural industry and veterinarians play a significant role in enhancing animal welfare standards and production within the industry. Veterinarians possess an in-depth understanding of physiology, diseases, and preventive measures, enabling them to provide crucial support along the entire supply chain.

The modern Western Australian (WA) sheep industry is characterised by an adult flock comprising 12.4 million (predominantly merino ewes) turning off between 4.5 and 6 million sheep and lambs annually for meat and live export¹. In 2019 veterinarians involved in live sheep export supply chains reported that 25 to 50 percent of their income was generated from activities pertaining to the live sheep trade².

The live sheep trade to the Middle East evolved from providing an alternative value market for surplus stock (mainly aged merino wethers and rams) to having a role in the production chain of the WA, and to a lesser extent South Australian (SA), sheep and wool industries and individual enterprises to manage welfare risks and their land. Additionally, many sheep production enterprises produce sheep as part of an environmentally sustainable model for grain production systems.

The live sheep trade provides a mechanism to manage breeding flocks during drought and seasonal fluctuations in feed. It allows for a stock reduction model whilst allowing for the retention of breeding females¹. The ability to reduce numbers during unfavourable seasons is a positive management tool

¹ <https://www.agric.wa.gov.au/livestock-animals/livestock-species/sheep>.

² Value Analysis of the Australian Live Sheep Export Trade, 2019. Mecardo
https://assets.ctfassets.net/8fjsq0xyf4sy/62P1HVEflluSpl7400Ylai/89ae72890e8450d5b87ff38389130c3e/W.LIV.1001_Final_report_Phase_1.pdf



in preventing land degradation from overgrazing particularly in the sensitive pastoral areas. Retention of ewes allows producers to retain animals suitable for local conditions at a sustainable level during adverse climatic conditions and to upscale quickly when seasons become more favourable.

The Australian Veterinary Association's position is that implementation of the phase out must be done in a manner and timeframe that allows for the role that live sheep export has played within the supply chain to be replaced.

The phase out must occur without compromising the whole of life sheep welfare – not only on an individual level but with a view to the biosecurity, health and welfare of the entire impacted sheep flock. Additionally, the risk to the viability of animal production systems currently engaged in sheep export must be minimised in order to underpin animal welfare outcomes.

Mechanism

The mechanism for phasing out must require that there are appropriate risk assessment and mitigation strategies to prevent unintended consequences to the welfare of the sheep during or after the phase out. Welfare will be addressed under two subheadings: welfare during transport throughout the phase out and whole of life welfare.

Sheep welfare during sea transport

The improved regulatory standards that have been achieved in the animal welfare of sheep during transport by sea must be maintained and reviewed during the phase out. The prohibition of exporting sheep into parts of the Northern Hemisphere during their Summer, in addition to other changes made, has shown improved voyage outcomes. Since 2018, the industry average sheep mortality rate during sea voyages has reduced from 0.8% to 0.2%³, well below the 1% threshold for voyages to be investigated by the regulator⁴.

The government must provide sufficient funds to ensure regulatory capability and capacity in live sheep export by sea during the phase out period continues.

During the phase out the AVA supports:

- a. Veterinarians being used as subject matter experts in animal health, biosecurity and welfare throughout the livestock export supply chain and acknowledges the importance of input from veterinarians involved in livestock export through research, private services, and government roles.
- b. The continuation of the Northern Hemisphere summer prohibition period to mitigate risk of heat stress. The prohibition in addition to other changes made, including increased space allocations, has shown improved voyage outcomes.
- c. Additional assurances and oversight by strategic use of Independent Observers which will continue to assist the regulator to review and refine live export requirements.
- d. Implementation of standardised data captured through the LIVEXCollect system as an important step for documenting animal welfare outcomes.

³ <https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/live-animal-export-statistics/reports-to-parliament>

⁴ https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/compliance-investigations/investigations-mortalities#_2020



- e. Further development of key animal welfare indicators that will be recorded during voyages and moving away from measuring success based on mortality measures alone
- f. The appointment of Inspector General of Animal Welfare and Live Animal Exports

Whole of life sheep welfare

Whole of life welfare for sheep must be maintained once the trade is discontinued however, there is currently no standardised mechanism for measurement. Government investment in technologies to assess whole of animal life wellbeing will allow policy decisions makers, international trade partners and consumers to make comparable and informed decisions on animal welfare of different production chain systems.

Currently many WA and SA sheep production systems are set up with the live export market as the destined market for portions of the flock. The certainty of income from this market allows for producers to make informed decisions including stocking rates, veterinary involvement, reproductive management, drenching and vaccination programs, and nutrition requirements to allow for meeting market specifications. High prices received from the live sheep export market underpin producers making good whole of life welfare decisions for their flocks. It is important that the transition to chilled and frozen meat trade provides similar levels of return to these producers.

In 2023, the export of sheep by sea is highly professional, highly systemised and a highly regulated industry. The same standards must be applied to all alternative markets that are developed for these sheep.

If sheep destined for the live export trade are to be processed in Australia this should occur as close to the site of production as possible to minimise animal welfare implication of road transport to abattoirs. As the majority of sheep feeding into the trade are within Western Australia this will require an increase in processing capacity and capabilities within that state; processing capacity in SA should also be considered.

It is recognised that from time-to-time long haul transport of sheep between WA and the eastern states may be justifiable however, standardised long haul road transport of sheep to east coast processing facilities to address a lack of capacity in WA and SA processing facilities is not appropriate and would have significant animal welfare consequences.

Timeframe

When deciding on the timeframe for phasing out live sheep exports by sea, it's important to consider two key factors. Firstly, the investment in sea transport infrastructure is expected to be limited now that the phase out has been decided. Secondly, it's essential to acknowledge that sheep enterprises make decisions and commitments based on medium to long-term considerations such as available markets, land use, flock structure and resource allocation.

Sufficient time will be required to avoid economic loss or prevent erosion of whole of life welfare improvements that have been made as a result of the live sheep export trade (e.g. management of excess stock in drought periods).

Adequate time is also required to ensure that there are sufficient processing capacity and capabilities in Western Australia and South Australia to cope with increased numbers of animals and suitable markets for the resultant meat products.



However, the delay must not be so long that it results in serious decline in vessel infrastructure and safety.

Impact and adjustment

Although only a small proportion of the total Australian veterinary profession will be directly impacted by the cessation of live sheep export by sea, the impact on those who are involved will be significant.

Veterinarians are involved across the entire live sheep export supply chain. They play a significant role in enhancing animal welfare standards within the industry and actively contribute to the prevention and control of diseases. These veterinarians include rural practitioners, veterinarians involved in pre-export protocol work, government veterinarians, Australian Accredited Veterinarians (AAV's), feedlot veterinarians and consultants and veterinarians involved in ESCAS and destination markets.

Any reduction in veterinary capacity limits the ability to supply essential veterinary services to rural communities and their animals. These include:

- access to general rural veterinary services including routine animal production, health and welfare services
- biosecurity and disease surveillance (at a time when this should be being strengthened, not diminished)
- veterinary services for those who live in rural communities but are not farmers.
- emergency services including after hours
- loss of specialist applied epidemiology skill and expertise.

Additionally, the impact to rural communities, especially those in rural Western Australia cannot be understated. Viability of rural communities is essential to preserve food security for Australia and maintain vibrant rural communities and agricultural sectors.

Failure to provide adequate time and supports for the sector to adapt could lead to reduced viability of sheep production systems and decline in this sector. This will have flow on effects to the viability of provision of veterinary services and more broadly to rural communities.

Strong veterinary services are critical for management of animal health, welfare and biosecurity. They are a vital component within the social fabric of rural communities. It is well known that animal welfare and human wellbeing are interdependent and the interaction between the two needs to be considered during the phase out. Balancing human mental health and wellbeing, and the welfare of the animals, a central concept of One Welfare, is paramount during the phase out.

Opportunities

Not only can veterinarians provide the expertise to ensure that animal health and welfare objectives are met through and beyond the phase out, but they are also well placed to have a role in the One Welfare paradigm.

In addition to their role in disease prevention and animal welfare, veterinarians also provide valuable advice on flock and risk management, helping farmers make informed decisions. They assist in optimising nutrition programs, implementing effective biosecurity measures, and developing strategies to improve economically based production efficiency.

Their expertise extends to reproductive management allowing for rapid introduction of new genetics and herd fertility optimisation, animal-associated aspects of veterinary chemical use, consumer safety, OH&S and trade implications - all of which contribute to the overall success of sheep farming enterprises.



During the phasing out, veterinarians can play a pivotal role in providing training to producers and industry groups. By leveraging their expertise and knowledge, veterinarians can equip stakeholders with the necessary competencies to manage the transition effectively and ensure the well-being of animals throughout the process.

Looking to the future there are the opportunities to embed veterinarians in livestock production systems to safeguard whole of life welfare. For example, requiring veterinarians to be essential elements through regulatory requirements of both the domestic and export processing facilities should be considered.

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