



**HUMANE SOCIETY
INTERNATIONAL**
AUSTRALIA



31 May 2023

To Whom It May Concern

Submission by Humane Society International (Australia) - Phase out of live sheep export by sea

Humane Society International Australia (HSI) is grateful for the opportunity to comment on the Government's forthcoming phase out of live sheep exports by sea.

HSI is the world's largest animal protection organisation and HSI Australia established our office in 1994. We work to create a humane and sustainable world for animals advocating across wildlife conservation and animal welfare policy areas. Our vision is for a world where people treat animals and nature with respect and compassion.

HSI has long opposed the live sheep export trade and supports a swift phase out with legislation in place as soon as possible to lock in a deadline. The live export of animals goes against the basic principles of animal welfare and always presents an unacceptable risk of animal cruelty.

HSI is also a proud member of the Australian Alliance for Animals, which was formed to pursue critical reforms to animal welfare regulatory frameworks. HSI welcomes the opportunity to provide this letter to express our full support for the submission by the Australian Alliance for Animals regarding the phase out of live sheep exports by sea. We offer the following comments in addition.

1. MECHANISM

- HSI strongly supports the introduction of legislation that provides certainty to both farmers, the live export industry, the Australian public, and animal welfare



organisations, which is introduced in this term of parliament. The election commitment is not fulfilled simply by having this consultation underway, instead, legislation needs to be written and introduced within this term of parliament.

- The introduction of legislation and the commencement of the phase out within this term of parliament is the only way that the Australian Labor Party can satisfy its' 2022 election promise.
- The Independent Observer reports have continued to report non-compliances, often without consequence. We therefore have concerns that animal welfare standards may slip during the phase out period. HSI strongly encourages the presence of at least one Independent Observer on each voyage, and for this to be made mandatory during the phase out period.
- HSI favours a stepped phase out with a gradual reduction in numbers exported to prevent large numbers being shipped as the trade nears the end date. This method of stipulating declining annual export quotas during each stage of the phase out period is more likely to favour better animal welfare outcomes.
- HSI strongly opposes the opening of any new live export markets for sheep, during or following the live export by sea phase out, and legislation needs to specifically ensure this does not eventuate.

2. TIMEFRAME

- An end date is essential to give certainty to all stakeholders, including farmers, the Australian public, and animal welfare organisations.
- HSI supports a realistic and achievable phase out period of no more than three years, with the trade end date on or before 1 May 2026.
- A two-year phase out of live exports was achieved successfully in New Zealand.

Animal welfare considerations:

The following animal welfare considerations constitute towards our support for a phase out of the live sheep export by sea trade within a swift timeframe, and with the lowest numbers of sheep leaving Australian ports:

Lack of reform:

- It is not possible to export large numbers of live sheep by sea humanely, and despite the implementation of the Exporter Supply Chain Assurance System (ESCAS) since 2012 to reform the trade, there have been continued reports of non-compliance and suffering.

Heat Stress:

- Environments with high humidity and heat are particularly challenging for sheep given their physiology, so they are more susceptible to suffering when subjected to these conditions.
- Despite the northern summer trade prohibition, sheep continue to suffer heat

stress during the months that surround the prohibited period. This suffering is impossible to avoid despite improvements with regards to stocking densities and ventilation.

- HSI recommends the expansion of the northern summer trade prohibition to the period from 1 May through to 31 October effective immediately and throughout the phase out.

Fully conscious slaughter:

- Once the sheep arrive at their destination to the Middle East, Australian sheep are slaughtered while fully conscious which HSI strongly opposes.
- If they were instead processed in Australia, the Halal-accredited slaughter here requires stunning.

Transportation:

- Noting that there are currently an estimated 800,000 to 1.4 million surplus sheep on-farm in Western Australia, HSI opposes the option of transporting significant numbers of sheep across Australia to restock flocks in the eastern states during and following the live export phase out.
- A fundamental principle of farm animal welfare is to slaughter an animal as close as possible to the point of production in order to minimise stress and discomfort. Long distance journeys contradict this most basic of principles from the outset.
- The best strategy is to make every effort to process animals as close to the farm as possible with minimal transport duration times.

Human welfare considerations:

- HSI notes that we appreciate the impact the live sheep export phase out will have on some farmers and stakeholders. We encourage the Government to offer both financial aid, the necessary resources, and mental health support to assist those affected where appropriate and necessary.
- The phase out of live sheep exports is supported by the majority of Australians, including those in Western Australia where the impact of the phase out will be the most significant. The continuation of the trade up to this point has also had mental health impacts on many members of the community who have been exposed to the footage and non-compliances that have occurred over the years. I know that I have personally felt those impacts and greatly appreciate the Labor Government's decision to phase out the trade.

Public Opinion and Social Licence:

- The animal welfare implications of the live sheep export trade have been under public scrutiny for decades, with elements such as heat stress during voyages, inhumane slaughter methods at destination countries, high stocking densities and the long arduous journeys losing the industry its social licence.

- The numerous media exposés and animal welfare disasters over the years have led to declining public support for the live sheep trade from Australia. There is also growing public concern for animal welfare in Australia¹.
- HSI supports the recent comment by Federal Agriculture Minister Murray Watt² that the sheep export trade has lost its social licence, and community opinion was that *“live sheep exports should be phased out”*.
- Polling³ commissioned by the RSPCA in January 2022 and conducted independently among a representative sample of 1,500 Australians found more than 2 out of 3 (67 percent) of Australians want an end to live export. This was the case for those living in cities and those in rural areas. Further, in Western Australia, where the vast majority of Australian sheep are live exported from, almost 3 out of 4 supported an end to the live trade.

3. IMPACT AND ADJUSTMENT

- HSI supports the provision of Government investment to assist farmers and impacted stakeholders to transition away from the live export trade. Investment towards additional processing facilities and associated labour costs would also be essential to help offer alternative markets for sheep that would have otherwise been directed to the live trade.
- HSI encourages the Government to provide support to farmers to transition to more humane and sustainable alternative markets.
- The live sheep export trade has already declined by more than two-thirds since 2017/18, from around 2 million sheep exported, down to approximately 500,000 sheep exported during 2022.
- Noting that there are currently an estimated 800,000 to 1.4 million surplus sheep on-farm in Western Australia, we believe this indicates that the live sheep export trade has not successfully acted as a means of displacing surplus stock.
- Western Australia’s boxed and chilled sheep meat export trade is valued at \$576M which is over six times more than the value of the live sheep export trade (\$92M)⁴. This puts into context the size of the live sheep export trade when compared to the sheep meat export trade. Phasing out the live sheep export trade still leaves viable options open to farmers within the sheep industry.

¹ Futureye “Commodity or Sentient Being? Australia's Shifting Mindset on Farm Animal Welfare”, DAWR, Canberra, 2018

² <https://www.beefcentral.com/live-export/red-line-that-cannot-be-crossed-ag-groups-stakes-stand-on-sheep-export-ban/>

³ <https://www.rspca.org.au/media-centre/news/2022/back-bad-old-days-rspca-again-warns-against-live-export-backflip>

⁴ ABARES, Agricultural Forecast and Outlook, 2022 Agricultural Commodities Report, Vol. 12.1, pages 78-79

4. OPPORTUNITIES

International reputation:

- Following a meeting with Senator Murry Watt earlier this year, chair of the House of Lords International Agreements Committee Dianne Hayter said, *"I think Senator Watt was quite surprised by how frequently animal welfare came up as a discussion topic during his visit to Europe and not simply in my meeting with him."*⁵
- Concerns have been raised over Australia's animal welfare standards falling short of those in Europe given that Australia continues to transport live animals over such long distances by sea.
- The live sheep export trade has put Australia's reputation at risk particularly during the Free Trade Agreement negotiations with Europe currently taking place. A swift phase out of live sheep exports by sea will help to protect Australia's international reputation for both the Australian sheep and wool industries.
- The live sheep export phase out serves as an essential measure to help maintain Australia's trade opportunities.

Climate Change:

- The animal agriculture industry is responsible for at least 14.5% to 16.5% of human-induced greenhouse gas emissions globally⁶, and it is also a major drive of deforestation, species extinction, land degradation, exhaustion of water resources and pollution⁷.
- Reducing livestock numbers and reducing our consumption of animal products is one of the most effective climate-mitigation measures⁸ we can take. Scientists agree—including the 107 experts who prepared a report⁹ for the UN's Intergovernmental Panel on Climate Change, and the more than 11,000 signatories from 153 countries to a paper on the climate emergency in the journal BioScience¹⁰—that a global shift towards more plant-based diets will be key in tackling climate change.
- HSI offers the premise that the phase out of the live sheep export trade could serve as an opportune time to reduce sheep numbers, moving towards more sustainable industries and helping to achieving Australia's goal to combat climate change.
- The phase out of live sheep exports by sea also results in considerable reductions in greenhouse gas emissions from the ships and refrigeration provisions.

⁵ <https://www.smh.com.au/world/europe/australia-s-backwards-animal-practices-still-in-the-way-of-free-trade-deal-with-britain-20230124-p5cex5.html>

⁶ <https://www.fao.org/news/story/en/item/197623/icode/>

⁷ <https://www.fao.org/3/a0701e/a0701e00.htm>

⁸ <https://www.science.org/doi/10.1126/science.aag0216>

⁹ <https://www.ipcc.ch/srccl/>

¹⁰ <https://academic.oup.com/bioscience/article/70/1/8/5610806>

SUMMARY:

In summary, HSI's recommendations include:

- HSI supports a phase out period of no more than three years, with the trade end date on or before 1 May 2026.
- HSI strongly supports the introduction of legislation that provides certainty to both farmers, the live export industry, the Australian public, and animal welfare groups.
- The legislation needs to be written and introduced within this term of parliament.
- HSI strongly encourages the presence of at least one Independent Observer on each voyage, and for this to be made mandatory during the phase out period.
- HSI favours a stepped phase out which stipulates declining annual export quotas during each stage of the phase out period.
- HSI strongly opposes the opening of any new live export markets for sheep, during or following the live export by sea phase out.
- HSI recommends the expansion of the northern summer trade prohibition to the period from 1 May through to 31 October effective immediately and throughout the phase out.
- HSI supports the provision of Government investment to assist farmers and impacted stakeholders to transition away from the live export trade. Investment towards additional processing facilities and associated labour costs would also be essential to help offer alternative markets for sheep that would have otherwise been directed to the live trade.
- HSI encourages the Government to provide support to farmers to transition to more humane and sustainable alternative markets.
- A swift phase out of live sheep exports by sea will help to protect Australia's international reputation for both the Australian sheep and wool industries.
- HSI offers the premise that the phase out of the live sheep export trade could serve as an opportune time to reduce sheep numbers, moving towards more sustainable industries and helping to achieving Australia's goal to combat climate change.

HSI appreciates the opportunity to offer our comments on this issue and hopes the recommendations outlined above and within the Australian Alliance for Animals submission contribute towards a timely phase out with minimal animal welfare disturbances.

We look forward to the live sheep export by sea phase out being swiftly legislated once the panel has reported in September. Our contact details for matters related to this submission are [REDACTED] at [REDACTED]

Yours sincerely

[REDACTED]

Animal Welfare Campaigner
Humane Society International Australia