

# Phase Out of Live Sheep Exports by Sea

Submission by Sentient, The Veterinary Institute for Animal Ethics

## Introduction

Sentient is an independent Australian veterinary association dedicated to animal welfare advocacy based on the ethical implications of animal sentience and the findings of animal welfare science. Our members are represented in academia, private practice (companion, equine and large animals), non-government, government and industry settings, with expertise in many fields including animal welfare, animal behaviour, clinical medicine, epidemiology and the use of animals in teaching and research. A number are qualified specialists in particular disciplines or have extensive experience within industries such as live export, horse racing and greyhound racing. Sentient has presented at international and national conferences, published papers, contributed numerous submissions to state and federal government inquiries, and provided evidence at parliamentary public hearings. We also host final year veterinary science students for Public, Industry and Community placements in animal welfare advocacy. Sentient is registered with the Australian Charities and Not-for-profits Commission.

We welcome the opportunity to contribute to the consultation process to assist the Australian Government to phase out live sheep exports by sea. Sentient applauds the Government for its election commitment to undertake this process to strengthen animal welfare in response to community concerns, documented incidents of cruelty and the recommendations of a series of inquiries (including the 2003 Keniry Review<sup>1</sup>, 2011 Farmer Review<sup>2</sup>, and 2018 McCarthy<sup>3</sup> and Moss<sup>4</sup> reviews). Phasing out live sheep exports by sea will enhance Australia's international reputation in terms of animal welfare standards and scientific scrutiny and will open opportunities in more sustainable and ethical trades involving sheep.

We wish to address the following terms of reference:

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<sup>1</sup> Keniry, J (2003), Livestock Export Review: Final Report, report to the Minister for Agriculture, Fisheries and Forestry, [Department of Agriculture, Fisheries and Forestry, Canberra]

<sup>2</sup> Farmer, B (2011) Independent review of Australia's livestock export trade, report to the Minister for Agriculture, Fisheries and Forestry, [Department of Agriculture, Fisheries and Forestry, Canberra].

<sup>3</sup> McCarthy, M (2018) Independent review of conditions for the export of sheep to the Middle East during the northern hemisphere summer, report to the Minister for Agriculture and Water Resources, [Department of Agriculture and Water Resources, Canberra]

<sup>4</sup> Moss, P (2018) Review of the Regulatory Capability and Culture of the Department of Agriculture and Water Resources in the Regulation of Live Animal Exports, report to the Minister for Agriculture and Water Resources, [Department of Agriculture and Water Resources, Canberra]

## Mechanism

- 1) How should the government implement the phase out of live sheep exports by sea? Why should the government use this approach?

Farmers and producers could readily sell their stock directly to abattoirs without delay and given that most of these sheep may end up exported as processed chilled and frozen product, there would be no changes needed to current breeding and management programs. The Government can assist this transition by promoting the uptake of chilled/frozen sheep meat by international markets.

Due to the number of sheep per year (approximately 500,000) who will be transferred from the live export trade, it will be crucial for the Government to support the expansion of any gap in domestic processing capacity. Labour shortages can be addressed through the work visa system to attract and train new domestic abattoir workers. The current oversupply of sheep in Western Australia suggests a crucial mechanism for the phase out will be for the Government to advise producers to reduce breeding as a matter of urgency.

Animal welfare should be given the highest priority during the phase out. This means ensuring the above mechanisms for managing any oversupply of sheep, providing support to farmers and producers, and ensuring that there is no unnecessary killing of healthy animals. It is also necessary to protect the welfare of sheep who continue to be exported by sea during the phase out period by:

- appointing Independent Observers to all ships, regardless of their point of destination
- independent monitoring of loading, and
- expanding the northern summer trade prohibition to the period 1 May to 31 October.

## Timeframe

- 2) What is an appropriate timeframe to phase out live sheep exports by sea? What are your reasons for proposing this timeframe?

Sentient urges the Government to legislate an end date during this term of Parliament for the trade in live sheep exports by sea. We are concerned that waiting for the next Federal election in 2025 could result in aborting this whole transition should there be a change of Government. Those working in the live export trade have had ample warning that this industry has lost its social licence so there has already been time for them to plan for their transition. There is no reason why the phase out cannot be effected within two years at a maximum, as has been achieved by the majority of New Zealand operators. The Parliamentary Senate Select Committee investigation findings back in 1986 determined that the export of sheep by sea “based on welfare findings alone should be phased out immediately”. Industry leaders have not acted in the best interests of producers by denying that the live sheep export trade has been on notice for decades and is

unsustainable. This has no doubt left many farmers/producers feeling stressed, confused and angry. We submit that a definite date for commencement of the phase out will provide them with certainty and a clear time frame for adjusting their business goals and practices away from live sheep exports to focus on either chilled/frozen meat or domestic markets.

As a veterinary organisation, Sentient's primary concern is the welfare of animals. Our regulatory system has been unable to protect sheep exported by sea from suffering, and for too many, this suffering is extreme. This is because the whole supply chain poses significant inherent risks, and even if Australian Standards for the Export of Livestock (ASEL) regulations were strictly complied with, which has not been the case, it is impossible to control all factors when sheep are shipped from Australia to the Northern Hemisphere. Live sheep export by sea is inherently dangerous to the animals involved due to heat stress (which cannot be overcome by ventilation), ship movement, 24-hour lighting and 90dB noise, restricted food and water access, faecal contamination<sup>5</sup> and potential catastrophes such as adverse weather events and mechanical failures. Australia's international reputation would be further harmed if we failed to achieve the proposed phase out of live sheep exports by sea in a timely manner.

## Impact and adjustment

3) Will you or your business be impacted by the phase out of live sheep exports by sea? If so, please provide details of the impact.

As a veterinary organisation dedicated to animal welfare and ethics, a phase out of live sheep exports by sea would be welcome and is long overdue. It would mean the end of unnecessary and extreme suffering of animals. Like many members of the public, we find the regular exposés of sheep suffering from heat stress, crowding, filthy bedding, inanition and disease or injury highly distressing. Such treatment of domestic animals would be prosecuted under animal welfare legislation, and it is incomprehensible to us that no previous Government has seen fit to end this form of legalised cruelty.

Veterinarians working within this industry could all easily be redeployed, particularly given the current shortage of experienced veterinarians. Shipboard veterinarians could transfer their employment to livestock consultancy ventures (whether these be government, industry or private), veterinary clinics or abattoirs to work as veterinary meat inspectors.

In terms of the broader society, it is in the public interest to end live sheep exports by sea on animal welfare grounds and on environmental grounds due to the potential reduction in greenhouse gas emissions from the ships and contamination of seawater and international beaches from manure and animal carcasses.<sup>6</sup>

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<sup>5</sup> <https://theveterinarian.com.au/?p=3221>

<sup>6</sup> <https://splash247.com/live-export-is-in-deep-shit/>

5) What barriers and/or constraints might there be for exporters, farmers, and other participants across the supply chain to transition away from live sheep exports by sea?

The major barrier to the success of this phase out we anticipate would be if farmers and producers are not able to access sufficient domestic abattoir processing capacity to process sheep who would otherwise be exported. Sentient urges the Government to address this as a matter of urgency.

6) How should supply chain participants be supported as they transition away from live sheep exports by sea?

The ongoing uncertainty for farmers due to mixed messages from Government and industry is likely to increase their stress and prevent them from receiving the support they need throughout the transition. We believe the best support for farmers and producers to reorganise their future ventures would be for the Government to:

- Legislate as soon as possible, and within this term of Government, for an end date in 2025 for the trade in live sheep exports by sea
- Ensure the domestic processing capacity is adapted as needed to cope with the influx of sheep previously destined for live export
- Advise, in liaison with industry bodies, on a smooth transition for farmers/producers to redirect sheep into the domestic processing chain and export trade for boxed chilled meat
- Offer financial support for farmers throughout the two-year period, such as drought relief, if they find themselves struggling to reduce their flocks and/or are taking longer than expected to offload sheep to the domestic market during a period of reduced pasture capacity

Some of the likely arguments from those in the live export trade will be unhelpful to this transition. This could be addressed by the Government issuing fact sheets and other forms of communication to reassure the public that the phase out of live sheep exports by sea from Australia will not be to the detriment of food security in the countries of destination because all these countries do have refrigeration capacity. The public should also be reassured that live sheep exports by sea are not essential to Australia's economy - this is a declining trade, which is now less than 1% of the Western Australia's agricultural trade and 0.1% of all agricultural trade.<sup>7</sup>

9) What can be learnt from other countries that have ceased live sheep exports? What lessons can be learned from Australian states or territories that no longer export live sheep by sea?

New Zealand has received global support on animal welfare and ethical grounds for its decision to ban the live export of livestock by sea from 30 April 2023. This animal welfare amendment bill was

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<sup>7</sup> [https://www.vale.org.au/uploads/1/0/4/3/10438895/22.3.3\\_vale\\_media\\_release\\_shep\\_live\\_ex\\_phaseout.pdf](https://www.vale.org.au/uploads/1/0/4/3/10438895/22.3.3_vale_media_release_shep_live_ex_phaseout.pdf)

passed in September 2022, two years after the sinking of a live export ship (The Gulf Livestock 1) near Japan, which killed 41 crew members and 6,000 cattle.<sup>8</sup> The New Zealand Minister for Agriculture has stated that this ban has protected the reputation of farmers and has supported the move by consumers to be more ethically conscious. The New Zealand experience has shown that farmers/producers can transition away from the live export trade in two years.

## Opportunities

10) What opportunities should the government and/or industry pursue in the lead up to and following the transition out of live sheep exports by sea? (e.g., expanding domestic processing and value adding, increasing sheep meat exports, other)

This lead-up towards the end of live sheep exports by sea provides an ideal time for the Government and industry to focus on:

- expanding the domestic processing capacity, which we believe should be done in regional areas to prevent long distance transport of sheep to abattoirs, and will have the added benefit of opening up employment opportunities in these areas
- developing trade agreements for the export of chilled/frozen sheep meat, particularly with nations with objections to live animal export

11) What would industry participants need, or need to do, to take advantage of opportunities?

A firm deadline for the end of the live sheep export by sea trade to be announced as soon as possible, along with support and clear guidance from Government and industry, including written information and a hotline for telephone advice to assist them to commence their business transition immediately.

12) What are the barriers and/or constraints to pursuing opportunities?

The main barrier is ongoing denial that the live sheep export trade by sea will end. This will no doubt be expressed by industry bodies, 'shock jocks', individual politicians, some political parties and elements of the print media. We believe such unhelpful attempts to delay the inevitable move away from a cruel, environmentally unsustainable and economically unimportant national trade will sabotage the success of a smooth transition, create more stress for farmers/producers and have negative impacts on animal welfare.

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<sup>8</sup> <https://www.theguardian.com/world/2022/sep/29/new-zealand-bans-live-animal-exports-from-april-2023>