



# Phase out of live sheep exports by sea

Submission  
May 2023

VETS AGAINST LIVE EXPORT

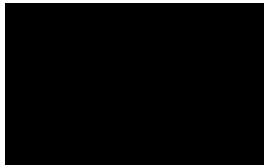


## **Re: Phase out of live sheep exports by sea**

Vets Against Live Exports (VALE) was established in 2011 and currently has over 250 members. Since its establishment, VALE has analysed available data on the live export industry, particularly information pertaining to sheep welfare during voyages to the Middle East.

VALE appreciated the opportunity to meet with the Independent Panel in March 2023 and welcomes this opportunity to make a formal submission on the phaseout of live sheep exports by sea.

Yours sincerely



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# EXECUTIVE SUMMARY

## VALE'S KEY RECOMMENDATIONS

1. The phase out period should be no longer than two years, with no sheep export voyages leaving after 31 December 2025.
2. Animal welfare should be prioritised during the phase out, with increased independent monitoring at Fremantle Port and on board ships (Independent Observers on every ship).
3. Live export voyages should not occur from May to October during the phase out.
4. Space allocation should be increased to a minimum of  $k=0.033$  for all voyages and all sheep classes during the phase out period.
5. There should be increased surveillance and regulation at all points in the live export chain during the phase out period.

# PHASE OUT OF LIVE SHEEP EXPORTS BY SEA

The Live Sheep Export Independent Panel requested feedback on:

1. how the government should phase out live sheep exports by sea
2. the timeframe to implement the phase out
3. how the phase out will impact exporters, farmers and other businesses across the supply chain
4. support and adjustment options for those impacted by the phase out
5. opportunities, including options to expand domestic processing and increase sheep meat exports.

VALE has largely confined itself to commenting on Point 1 and Point 2. It is not VALE's role to advise on the relative social or economic impacts of the phase out timing on Western Australian livestock producers or exporters (two foreign companies). However, VALE can comment on the impact to Australian veterinarians. VALE can also make brief comments about sheep meat export opportunities.

## 1. HOW SHEEP EXPORTS BY SEA SHOULD BE PHASED OUT

Animal welfare was the reason for the phase out so animal welfare must be a priority during the phase out.

There is a significant risk that a slow phase out could result in a significant decline in infrastructure standards (investment in maintenance and upgrade not considered worthwhile) and personnel expertise (the more skilled stockpersons on ships and at feedlots and feedlot managers could exit the industry earlier for other positions, knowing the terminal nature of current positions). Both could impact adversely on animal welfare.

Due to these concerns, VALE recommends a high level of federal government surveillance and regulation by the Department of Agriculture, Fisheries and Forestry ('the Dept') during the phase out. However, in April 2023 (after VALE's meeting with the Independent Panel), the Inspector General of Live Animal Exports reported there are currently insufficient funds for adequate regulatory capability and capacity in live export and the Dept will not be able to move towards better regulatory practice in the medium term.<sup>1</sup> If the Dept has insufficient funding and capacity, there should be a rapid phase out and increased reliance on independent monitoring during the phase out:

- i) Independent monitoring at Fremantle Port should be instigated. As discussed with the Panel, Animals Angels has the necessary discretion, expertise and experience to perform this role and their access to Fremantle Port should be reinstated and formalised as soon as possible.
- ii) Independent verification of truck weights at a weighbridge at Fremantle Port (AVA 2018) is necessary. Exporters may well be tempted to load as many sheep as possible in the remaining seasons. Currently, weighing trucks is only done at exporter weighbridges and is not independently verified. Weighing sheep at port would ensure appropriate sheep weight can be allocated to the total deck area.
- iii) Independent observers should accompany every ship, with the full independent observer report (with necessary privacy and commercial confidentiality redactions) published within a short time frame of each voyage (e.g. maximum 4 weeks).

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<sup>1</sup> See: <https://www.iglae.gov.au/sites/default/files/2023-04/communication-and-engagement-in-livestock-export-regulation.pdf> (Accessed 20 April 2023)

To improve animal welfare during the phase out, VALE believes that during this time, the following recommendations of the Australian Veterinary Association (AVA) should be followed:

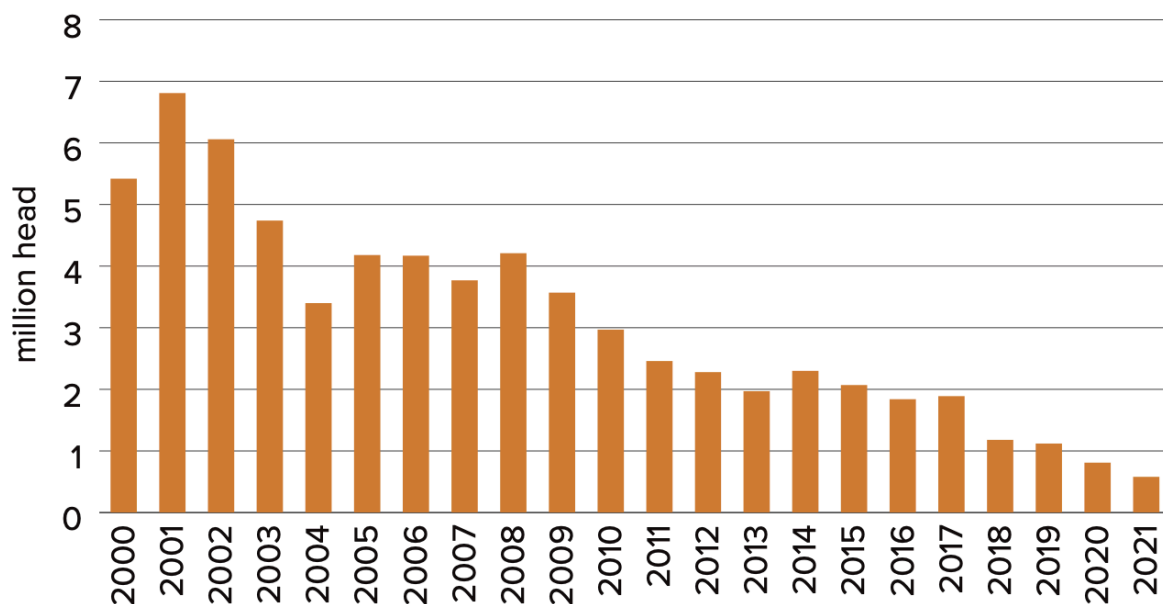
- i) Voyages carrying live sheep to the Middle East during May to October should not proceed. Irrespective of stocking density, thermoregulatory physiology indicates that sheep on live export voyages to the Middle East during May to October will suffer from heat stress due to the expected extreme climatic conditions during this time. The Dept's most recent Export Advisory Notice has already effectively increased the prohibition period stipulating dates beyond which ships must be west of certain longitudes. However, it is still evident from contemporary analysis of Independent Observer reports that May and September voyages carry greater risk as predicted by the (AVA 2018).
- ii) Space allocation per animal should be based on a k-value of 0.033. This k value is the minimum amount needed to alleviate adverse welfare outcomes and should be implemented across all body weights and all months of the year. Industry claims of current best practice must be taken with scepticism. The industry long maintained that their space allowances on live export ships were optimum and designed experiments did not have the statistical power to show any benefit from the small changes investigated (Ferguson and Lea 2013, Phillips and Petherick 2015). The drastic decrease in mortality since increased space allowances were instituted in 2018 showed just how incorrect these industry funded studies and historic assertions were. As such, although it is not known how much animal welfare will improve by increasing the current space allocation to a k value of 0.033, on precautionary principle alone, space allowances should still be increased to the AVA recommendations.

## **2. TIMEFRAME TO IMPLEMENT PHASE OUT**

Given the welfare concerns of a phase out, and the limited regulatory capability and capacity of the Dept, the phase out should be as swift as possible. New Zealand ended their substantially more valuable live export cattle trade in two years. Two years should thus be feasible and should be the maximum time period for the phase out to occur. Therefore, no further sheep should be exported after 31 December 2025.

## **3. HOW THE PHASE OUT WILL AFFECT VETERINARIANS**

This industry has essentially been in decline for the last 10 years (see Figure 1) so producers, exporters, veterinarians and all those servicing the industry should have been prepared. Very few veterinarians will be significantly affected by the phase out and those few veterinarians will ultimately be impacted regardless of the speed of the phase out. There are very few sheep-only veterinarians and most if not all of these operate in eastern Australia. Servicing sheep farms is a very low income-earner for most Australian production animal veterinarians.



Source: DAFF

Figure 1 Australian Sheep Live Exports 2000–21

Even veterinarians accompanying live export voyages, are unlikely to be significantly affected by the relative speed of the phase out. In 2014, very few veterinarians did more than one voyage annually (Questions to Senate Estimates, May 2015 Q109)<sup>2</sup>, with 30 or more of the 81 voyages that were accompanied by a veterinarian (sheep and cattle voyages) employing just 3/64 eligible veterinarians. It is likely that the majority of the 32 sheep voyages to the Middle East in 2014 were accompanied by only three veterinarians and that that situation is not significantly different in 2022–23. In addition, many live export veterinarians also work in cattle export, which will likely be unaffected by the phase out.

#### 4. OPPORTUNITIES, INCLUDING OPTIONS TO EXPAND DOMESTIC PROCESSING AND INCREASE SHEEP MEAT EXPORTS.

Processing animals locally as opposed to exporting them live has the effect of value-adding to the Western Australian economy. The livestock industry has long resisted investigation of expanding opportunities for meat export as an alternative to the live export trade. This resistance has likely resulted in income loss to Australian producers. For example, a Live Corp report (ACIL ALLEN 2022) notes that Indian buffalo meat will continue to be a key competitor for Australian live cattle in South East Asia. The report states that in the event that Australia ceased live cattle exports to Indonesia, it may be that the short-term response by Indonesia would be to import more processed beef. Thus, there is industry evidence for direct competition between live export and the boxed meat trade. With respect to sheep meat, even as far back as 2014, a survey by ABARES concluded that in the Middle East 'substitutability between Australian live sheep and sheep meat imports has increased in recent years, largely reflecting growth in incomes, urbanisation, refrigeration availability and popularity of

<sup>2</sup> See:

[https://www.aph.gov.au/Parliamentary\\_Business/Senate\\_Estimates/rtratcte/estimates/bud1516/ag/index](https://www.aph.gov.au/Parliamentary_Business/Senate_Estimates/rtratcte/estimates/bud1516/ag/index) (Accessed 20 April 2023)

western style supermarkets'. This is underscored by the experience in Bahrain, which stopped importing Australian sheep in 2014, after which sheep meat imported from Australia increased over two-fold.

## REFERENCES

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