



Animal Welfare

The live export of sheep by sea causes significant suffering and results in poor animal welfare. The animal welfare issues are inherent to this trade and are not simply the result of outlying instances of cruelty or specific individual practices within the trade.

This is largely because Australian sheep are fundamentally ill-suited to Middle Eastern climates. Ultimately, Australian Merino sheep do not cope well in high humidity environments, but these are precisely the conditions they are sent into when travelling through the equatorial regions at all times of the year and when entering the Middle Eastern climates in the Persian Gulf and Red Sea during the shoulder season in May, September and October.

While the current northern summer prohibition period has reduced mortality rates from June to September, the 2018 McCarthy review made it clear that mortality rates are a fundamentally inadequate measure of animal welfare.² Recommendation three from this Government commissioned review, recommended industry move to a risk assessment model based on welfare rather than mortality.³ A focus on mortality rates fails to properly account for the experience of the majority of sheep on these vessels, who, whilst surviving the journey, still frequently suffer extreme heat stress during the voyage.

While we recognise that following the McCarthy review several welfare measures were trialled including reduced stocking densities, and the use of de-humidification technology, the continued incidences of poor welfare on live export vessels indicate that these measures have not delivered adequate results. For example, the Australian Veterinary Association (AVA) has made it clear during previous consultations that reductions in stocking density are not enough to address welfare issues resulting from heat stress, as the thermoregulatory physiology of Australian sheep means they are still prone to suffering heat stress.⁴

In addition to the welfare issues caused by heat stress, it is important to note that another key concern arises due to the treatment of Australian sheep once they arrive

² Doctor Michael McCarthy, *Independent Review of Conditions for the Export of Sheep to the Middle East During the Northern Hemisphere Summer* (Review 2018), page 8.

³ Ibid.

⁴ Australian Veterinary Association (AVA), *Live sheep exports to or through the Middle East – Northern Hemisphere summer Draft RIS – December 2019* (AVA Submission), page 2.



in their destination market. In recent years, there have been alarming reports where public exposés have revealed regulatory failures involving the Exporter Supply Chain Assurance System (ESCAS).⁵ Footage aired on the ABC depicted sheep being slaughtered using unacceptable methods, including instances of sheep being subjected to multiple attempts of throat slitting. In addition, even the approved standards under ESCAS would not meet expectations for Australian processing, as sheep are permitted to be killed without stunning – leading to animals suffering a slaughter process while fully conscious. Given we cannot adequately regulate the welfare of Australian sheep once they leave our shores, it is clear that live sheep export by sea is not a responsible or humane option.

Public Sentiment

Ultimately, the social license of the live sheep export industry has been in rapid decline, with the majority of the public no longer supporting or approving of its activities. Allowing this industry to continue would fail to meet the expectations of the Australian public and science-based welfare standards. Multiple instances of documented cruelty and suffering of Australian sheep, both on live export vessels and when they reach their destination, has resulted in a significant decline in the public's trust and confidence that this industry can operate in a humane way. A clear indicator of this declining trust in the live sheep export industry can be seen in the public sentiment polling commissioned by the RSPCA. In 2015, 63% of Australians supported the phase out if affected farmers were provided with assistance to transition. While in 2018, that support rose to 77%, and remained at high levels in 2022.⁶ Support for a phase out was highest in Western Australia.⁷

It is important to note that this is not a new issue for the Australian public. The 2018 Future Eye Report on Australia's shifting mindset on farm animal welfare, commissioned by the Department of Agriculture, found that *'[w]hen analysing the drivers of concern of farming in Australia in general, quantitative research results indicate that poor animal welfare standards of animals on export ships and poor animal welfare for Australian animals abroad rank as the highest drivers.'*⁸

⁵ See, for example, *ABC Lateline* (TV broadcast, 22 October 2014).

⁶ Digital Edge, *Omnibus Polling – Public Sentiment, live sheep export* (Conducted for RSPCA Australia, January 2022).

Methodology - weighted representative sample of n=1502 Australians. Population proportionate polling conducted in context of review of northern hemisphere summer prohibition (and in the absence of any recent significant media coverage on live export).

⁷ Ibid.

⁸ Future Eye, *Australia's shifting mindset on farm animal welfare* (Report 2018) Page 11.



Furthermore, the report found that live export was the *'issue raised most frequently without being prompted'* and further, that it was *'top of mind for groups in Perth'*.⁹ The findings from this Government commissioned report demonstrate that the live sheep export industry fundamentally does not align with the values or expectations of the Australian public.

The Australian public expects farmed animals to be treated well and, unfortunately, when sheep are loaded onto live export vessels and then slaughtered under low welfare systems overseas, these expectations simply cannot be met. Despite years of attempted reforms, the views of the public have remained clear: they do not support live sheep exports by sea.

Declining support for the live sheep export industry also has ramifications beyond our domestic borders. World Animal Protection is responsible for producing the Animal Protection Index (API). This index assesses how countries around the world deliver on animal welfare and animal protection. In the latest version of the API from 2021, Australia received a 'D' rating, with the continued long distance, live transport of animals a contributing factor in this poor rating.¹⁰

Furthermore, recent free trade agreement (FTA) negotiations have revealed tensions between trading partners regarding Australian animal welfare standards. The live export of sheep by sea was a frequent topic of debate during the Australia-United Kingdom FTA process, with many in the UK expressing concerns about opening agricultural trade with Australia while this industry was allowed to continue.¹¹ If allowed to continue, the live sheep export trade, with its well documented animal welfare issues, has the potential to erode trust in the broader Australian agriculture sector and to further damage Australia's reputation as a global trading partner.

Ultimately, it is an industry that is beyond reform, both from a scientific animal welfare perspective, in the eyes of the Australian public, and many of our key global trade partners.

⁹ Ibid.

¹⁰ World Animal Protection, Animal Protection Index (website, accessed 17th May 2023)

<https://api.worldanimalprotection.org/country/australia>

¹¹ See, for example, Latika Bourke, 'Australia's 'backwards' animal practices still in the way of free trade deal with Britain' (*Sydney Morning Herald*, online, January 25 2023)

<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>



Phase-out mechanism

World Animal Protection firmly believes the phase out of live sheep exports by sea must be enshrined in legislation. This should be included under amendments to the *Export Control Act 2020* (Cth) to prohibit exporting sheep by sea. This legislation should be introduced and passed through Parliament in the current term of Government, with the phase out to be implemented as soon as possible thereafter.

A legislated phase out would help provide certainty to producers and to the Australian public who have been advocating for this phase out for many years. It will also help provide the best possible protection for Australian sheep now and into the future.

Ultimately, we would like to see a phase-out that ensures no live sheep exports are allowed to continue beyond early 2026. As 75% of the trade has already declined over the past few years, leaving only 500,000 sheep departing annually, it is clear the industry is declining. The Department has acknowledged the decline of the live sheep export industry year-round, not just as a result of the northern summer prohibition period.¹² In light of this clear downwards trend, we believe a phase out timeframe of approximately 3 years would be appropriate. This would allow the Government to achieve a reasonable balance between animal welfare, the community's expectations, and allowing producers time to adjust. In addition to a legislated phase out, World Animal Protection would encourage the government to implement a range of interim measures to help better protect sheep welfare during the transition period.

Firstly, we would like to see a stepped-phase out, whereby there would be a year-on-year reduction of the number of sheep exiting Australia on live export vessels. This should send a clear signal to the industry regarding the need to transition promptly. A gradual phase-out whereby yearly export caps decrease overtime would also allow for a steady shift to onshore processing, with increasing investment in local capacity overtime. It would also reduce the risk for a 'rush' on live exports, which could see more animals loaded onto vessels to get ahead of any phase-out deadline.

¹² Department of Agriculture, Fisheries and Forestry, *Review of live sheep exports by sea to, or through, the Middle East during the Northern Hemisphere summer* (Final Report, September 2022) page 10.



Second, we would ask the government to expand the prohibition period for the northern hemisphere summer. We would like to see this expanded to include the shoulder months where extreme temperatures are still experienced. This would ensure no boats could travel during the months from May-October inclusive. As outlined above, heat stress is a significant welfare concern for Australian sheep. While this risk can never fully be mitigated, expanding the prohibition period would help to reduce the risk of adverse welfare outcomes.

Third, we would like to see additional welfare measures introduced as soon as possible to ensure that the scaling back of investment in the live sheep trade does not increase negative welfare outcomes. This should include a legal requirement that all live export vessels have an Independent Observer on board for the duration of the journey. It should also include a requirement under ESCAS for individual electronic ear tagging, to help reduce the risk of sheep being sold outside the system.

Finally, we would like to see a prohibition on the opening of any new live export routes. Only those already established should be allowed to continue during the phase-out window. Allowing the opening of new routes would send mixed signals to industry and the public and would not align with the long-term goal of ending the live export trade.

While the economic transition is not our area of expertise, we note that we are wholly supportive of a suitable package for industry to help facilitate a just transition to chilled and frozen sheep meat. We are cognisant of the current limitations in processing capacity in Western Australia, as well as potential labour shortages. As such, we support the Government in providing funding and all necessary assets to enable a smooth transition to local, value-added sheep meat processing, as a more humane alternative to the live export trade. This could include transition funding to re-train workers, as well as investment in key infrastructure to increase local processing capacity.

A legislated phase-out that includes these additional protective measures would help deliver a phase-out in a timely manner that aligns with animal welfare science and public expectations, while still allowing industry adequate time and financial support to transition.

worldanimalprotection.org.au

[REDACTED]

[REDACTED]

World Animal Protection limited (formerly WSPA Australia Limited) [REDACTED]



Opportunities for the future

There are a range of opportunities presented by this phase-out. The first, includes the opportunity to help influence broader animal welfare standards. While there have been claims made that suggest Australian live sheep exports are a 'humane' alternative to our global competitors, the welfare science makes it clear that this is simply not the case. Australia cannot participate in live sheep exports in a humane way that meets animal welfare guidelines or public expectations. Therefore, to suggest that Australia is setting a better standard by participating in this industry is false.

However, by publicly committing to phasing out the live sheep export industry, Australia would send a clear signal to other markets that this trade is no longer acceptable. We would be joining with other countries such as New Zealand, who have already phased out live exports, and the UK who are currently considering their own phase-out.¹³ Even a Brazilian court recently imposed a ban on live exports due to welfare concerns.¹⁴ Australia has significant influence as a major agricultural producer. By taking a clear stand on this issue we could help improve the welfare of animals beyond our own borders. This could be done via trade mechanisms such as FTAs. For example, the recent UK Australia FTA includes an animal welfare chapter which has broad goals on collaboration, sharing learnings and insights to work towards improved standards and alignment with trading partners. With a phase-out of live export in place, Australia could use this to leverage similar phase-outs in other markets via trade agreements.

There are additional ways Australia could help influence global animal welfare standards. World Animal Protection has observer status with the United Nations. Over the years we have used this observer status to help shape global animal welfare standards to deliver improvements for animals around the world. For example, in 2021 World Animal Protection worked with seven countries to help submit a resolution on animal welfare to the United Nations Environment Assembly. This resolution was the first of its kind, formally recognising the link between animal welfare and the interconnected environmental crises of climate change, biodiversity

¹³ Tess McClure, New Zealand Bans Live Animal Exports from April 2023 (*The Guardian*, online, 29 September 2022) <[theguardian.com/world/2022/sep/29/new-zealand-bans-live-animal-exports-from-april-2023](https://www.theguardian.com/world/2022/sep/29/new-zealand-bans-live-animal-exports-from-april-2023)>

¹⁴ Anna Mano, Brazil court bans live cattle exports over animal welfare concerns (Reuters, online, 28 April 2023) <<https://www.reuters.com/business/sustainable-business/brazil-court-bans-live-cattle-exports-over-animal-welfare-concerns-2023-04-27/>>



loss and pollution, and sustainable development.¹⁵ There are a variety of international forums and UN bodies through which reforms can be introduced that improve the welfare of animals globally. If Australia takes a leading position on animal welfare by acting to phase out industries that lead to suffering such as live export, it places our country in a good position to lead others in improving standards across the board.

In addition to the opportunity for Australia to take a leading position on improving global welfare standards, there are also opportunities for industry growth in Australia, provided adequate support is offered during the transition. For example, there is an opportunity to create additional local jobs in Western Australia to help facilitate processing closer to farms. A 2022 report from the Australian Bureau of Agricultural and Resource Economics (ABARES), found that Western Australia's boxed and chilled sheep meat export trade is now worth \$576 million, more than six times that of the live sheep trade at \$92 million.¹⁶ ABARES outlook for sheep meat exports is also positive, stating "the value of sheep meat exports from 2024-25 to 2027-28 is expected to continue rising due to an increased consumer base and income growth in existing key markets and emerging markets."¹⁷ This industry is already strong, and with adequate support, industry operators currently relying on live export could transition to chilled and frozen alternatives, helping to expand this sector and create more Australian jobs. This creates a positive benefit for industry, while also safeguarding sheep welfare and better meeting public expectations.

Conclusion

Thank you again for the opportunity to participate in this review process. We would like to note that our submission has been endorsed and signed by 4,505 World Animal Protection supporters, who are eagerly awaiting a positive outcome for Australian sheep.

We consent to our submission being published on the department's website.

Should the panel have any additional questions, please do not hesitate to contact us, we are happy to provide any additional information that would be useful.

¹⁵ World Animal Protection, *Global Review* (2021) <
<https://www.worldanimalprotection.org/sites/default/files/media/world-animal-protection-global-review-2021.pdf>>

¹⁶ ABARES, Agricultural forecast and outlook, 2022 Agricultural Commodities Report, Vol. 12.1, p. 78-79.

¹⁷ ABARES, Agricultural Outlook, Sheep Meat 2023-24, <https://www.agriculture.gov.au/abares/research-topics/agricultural-outlook/sheep-meat#value-of-exports-to-rise-in-the-medium-term>

