

Independent Panel for the phase out of Australia's live sheep export
Email: Livesheep.phaseout@agriculture.gov.au

31 May 2023

To the Independent Panel
Re: Supporting a phase out of Australia live sheep export trade

Thank you for the opportunity to provide input into the consultation on how and when the Australian Government's phase out of live sheep exports should occur. Please accept this letter as a formal submission from **The Royal Society for the Prevention of Cruelty to Animals (RSPCA South Australia)**.

RSPCA South Australia was established in Adelaide in 1875. We have remained the leading voice for all creatures great and small across South Australia. Our vision for a compassionate society free of animal cruelty and suffering underpins our mission to prevent cruelty to animals by actively promoting their care and protection. We believe an animal's welfare should be considered in terms of the Five Freedoms - freedom from hunger and thirst; freedom from discomfort; freedom from pain, injury or disease; freedom to express normal behaviour; and freedom from fear and distress.

Live export does not foster any of the five freedoms. Rather, it creates extreme suffering and poor animal welfare outcomes. Sheep welfare issues are inherent to the trade and cumulative over the long journeys from the farmgate to overseas destinations and full conscious slaughter. Therefore, RSPCA South Australia opposes the export of live food animals for immediate slaughter or further fattening. A more humane alternative to live export is a boxed and chilled meat trade, which will better protect sheep welfare by processing the animals as close to the farmgate as possible.

South Australia is an example of how an Australian state can, and has, successfully transitioned out of live sheep export. The last consignment of sheep from a South Australian port was in 2018. Since that time sheep producers have adapted to market alternatives that are more humane, more sustainable and more publicly acceptable than live sheep export. Therefore, we recommend the Independent Panel consult with South Australian producers, and other supply chain stakeholders, to discuss the successful transition out of live sheep export and opportunities available for doing so.

South Australia's dark history of live sheep exports also provides examples of the inherent animal welfare risks of the trade. This includes the cumulative stressors of sending sheep on long, hot and humid journeys - noting that animals departing South Australia have an additional four to six days added to long and arduous sea transport before docking in West Australia and then onto overseas destinations. It also shows how mechanical breakdowns of live export vessels significantly heighten animal welfare and biosecurity risks. For example, in 2011 the Al-Messilah ship broke down at sea, just a day after departing Port Adelaide, leaving 67,000 sheep stranded, before returning to Port <https://www.adelaidenow.com.au/news/south-australia/sheep-off-loaded-from-stranded-ship-al-messilah-in-port-adelaide/news-story/7565c14728d04c5bb34858377c83e1d1>). More than 200 sheep perished and the remaining sheep were offloaded and transported to a feedlot.

RSPCA South Australia has past reports on file about animal welfare concerns related to live sheep export. These include reports of sheep being confined overnight in trucks outside feedlots due to arriving outside feedlot operation hours. Reports also highlighted how sheep were transported in extremely hot weather from feedlots to port for loading onto live export vessels. Further reports also detailed a lack of effective animal welfare monitoring and enforcement to ensure that sheep were transported to the port and loaded in compliance with applicable state and federal Animal Welfare regulations. Overall, live sheep export is a risky trade, and no amount of regulation can fully mitigate the animal welfare risks.

The Royal Society
for the Prevention of
Cruelty to Animals
(SA) Inc.

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Shelters



Therefore, we ask that as the Independent Panel on this important issue, you please ensure that the welfare of Australian sheep is central to your advice to the government, and not subordinated to the human and economic impacts of the phase out. We highlight that animal welfare science and expert advice has long supported an end to live sheep export, and the time for a phase out policy is decades overdue. For example, in 1985 a review of the live sheep trade by the Senate Select Committee on Animal Welfare concluded that:

“... if a decision were to be made on the future of the trade purely on animal welfare grounds, there is enough evidence to stop the trade. The trade is, in many respects, inimical to good animal welfare, and it is not in the interests of the animal to be transported to the Middle East for slaughter.”

We note that most Australians have consistently called for an end to the trade. Independent research conducted by McCrindle in January 2022 showed 78% of Australians support a phase out of the live sheep trade if affected farmers were provided assistance to transition. Community support here in South Australia is higher than the national average, at 79%. Ending live sheep export is extremely important to the community.

Therefore, RSPCA South Australia would like to see the Australian Government adopt all of the following recommendations (these align with the recommendations that the RSPCA Australia has detailed in its submission):

Recommendation 1: The Australian Government must implement the phase out of live sheep export through legislation to ensure a mandatory mechanism to support the end of the trade.

Recommendation 2: The Australian Government must expand the Northern Summer Prohibition (to 1 May - 31 October inclusive) in the interim until the end date of Australia's live sheep trade.

Recommendation 3: The Australian Government must implement a declining annual cap on the number of sheep allowed to be exported in the interim until the end date.

Recommendation 4: The Australian Government must not permit any expansion or reinvigoration of live sheep market access in the interim until the end date.

Recommendation 5: The Australian Government must reinforce regulatory compliance and enforcement measures to protect sheep welfare in the interim until the end date.

Recommendation 6: The Department of Agriculture, Fisheries and Forestry must introduce mandatory independent third-party inspections prior to loading live sheep for export in the interim until the end date.

Recommendation 7: The Department of Agriculture, Fisheries and Forestry must require that Independent Observers attend all live sheep export journeys from Australia in the interim until the end date.

Recommendation 8: The Australian Government must pass legislation in this Parliamentary term and before the 2025 election, to end Australia's live sheep export trade.

Recommendation 9: The Australian Government must ensure a short-term phase out period of no longer than three years, from the passing of legislation, to avoid adverse animal welfare outcomes of a long-term phase out.

Recommendation 10: The Australian Government must ensure that animal welfare remains a priority of Australia's live sheep phase out, and is not subordinated to economics.

Recommendation 11: The Australian Government must mitigate any increased risk to sheep welfare in WA by allocating funding for an animal welfare response package to address any adverse sheep welfare impacts that may arise during the phase out period.

Recommendation 12: The Australian Government must address the current processing limitations in WA as highest priority to ensure sheep can be processed as close to the farm gate as possible.

Recommendation 13: The Australian Government must invest in road and transport infrastructure for the main arterials from WA to the eastern states to mitigate any animal welfare risks if increased road transport of sheep in Australia is a necessary interim solution.

Recommendation 14: The Australian Government must prioritise the review and update of the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (2012).

Recommendation 15: The Australian Government must encourage greater leadership from Australia's peak primary industry bodies to invest in the design and delivery of initiatives to support the mental health and wellbeing of Australian primary producers.

Recommendation 16: The Australian Government must incentivise the transition away from live sheep export to alternative markets as part of any structural adjustment package for primary producers.

Recommendation 17: The Australian Government must support the expansion of Australia's chilled and boxed meat trade as a more humane and sustainable alternative to live export.

Thank you for the work you are conducting on this important matter. The phase out will represent a milestone policy change in Australia that will, most certainly, better protect the welfare of hundreds of thousands of sheep over time. Please do not hesitate to contact us for further consultation via RSPCA South Australia's Policy Officer, Rebekah Eyers, at [REDACTED]

Yours sincerely

Marcus Gehrig
Chief Executive Officer
RSPCA SA