



Department of
**Primary Industries and
Regional Development**

Our reference: 64-15490/MIN8897
Enquiries: Bruce Mullan [REDACTED]

Dr Melissa McEwen
Principal Regulatory Officer
Live Animal Exports
Department of Agriculture
MEsheepexports@agriculture.gov.au

Dear Dr McEwen

**REGULATION IMPACT STATEMENT FOR LIVE SHEEP EXPORTS TO, OR THROUGH, THE
MIDDLE EAST DURING THE NORTHERN HEMISPHERE SUMMER**

The Department of Primary Industries and Regional Development (Department) welcomes the opportunity to contribute to the review of the Regulation Impact Statement (RIS) for live sheep exports to, or through, the Middle East during the Northern Hemisphere summer.

The Department supports the recommendations made in option two – Implementation of a prohibition on live sheep exports from 1 June to 14 September with additional prohibited periods for Qatar and Oman. Option two provides improved safeguards for good animal welfare outcomes and reduces the risk of an adverse welfare event due to heat related causes significantly more so than option one does. Option two also supports the important role the live export trade has in Western Australia's sheep industry and provides a longer trading season which will have positive outcomes for regional communities, including support services such as transport, feed manufacturers and shearers.

The Department does **not** support option one as it does not significantly reduce the risk of an adverse welfare event occurring.

The Department continues to support the development of a revised Heat Stress Risk Assessment (HSRA) model using heat stress thresholds instead of mortality. The inclusion of option three as part of managing animal welfare risks associated with live export may be supported in the future if a revised HSRA model is completed and sound modelling as to its impact could be made. It is likely that this would need to be used in parallel with a prohibition on export during certain periods. Any model must be robust and tested prior to being used as part of a regulation process.

It is of the highest importance that any regulatory changes are made as soon as possible to provide industry some certainty and time to plan and that these changes are communicated widely with industry.

Yours sincerely

HEATHER BRAYFORD
**DEPUTY DIRECTOR GENERAL
SUSTAINABILITY AND BIOSECURITY**

6 February 2020