



31st January 2020

Department of Agriculture
Live Animal Exports Division

Live sheep exports to or through the Middle East: Draft regulation impact statement

The PGA is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions of Western Australia.

As a state farming organization, the PGA supports its membership in the operation of profitable and sustainable farm businesses.

The export of live sheep to the Middle East is important to Western Australian livestock producers because WA is the major supplier of sheep for the live export trade. Livestock sales are equally as important as wool revenue for both specialist livestock producers and mixed sheep and cropping farms.

Live export also provides buying competition in the marketplace for Western Australian sheep.

Almost all Western Australian sheep have to travel to the Middle East or through the Middle East, with 60% of the trade going to Kuwait and Qatar over the last five years.

82.4% of Australia's live sheep exit the country through the port of Fremantle at 1.5 million head per annum averaged over the last five years.

Therefore, having access to a number of different markets, including those overseas, is important in providing significant value options given the variation in seasonal conditions and markets in Western Australia.

Following the release of video footage obtained by Animals Australia in April 2018 that showed Australian sheep in severe heat stress while being transported on the MV Awassi Express to the Middle East in August 2017, the Commonwealth Department of Agriculture took the following actions;

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- ✓ all vessels travelling to the Middle East have their ventilation characteristics independently verified,
- ✓ bedding is loaded on sheep voyages to the Middle East for use in managing unsatisfactory pen conditions,
- ✓ where Kuwait is a destination port, it is the vessel's first port of unloading, and
- ✓ the reportable mortality level for sheep was reduced from two per cent to one per cent.

The Department subsequently cancelled the livestock export licence of Emanuel and of EMS, its subsidiary.

Further, for voyages carrying live sheep to the Middle East (including through the Persian Gulf and Red Sea), each animal has 17.5 per cent more space than currently required by the ASEL from 1 November 2018 until implementation of the revised ASEL.

Directions were also made under the *Australian Meat and Live-stock Industry Act 1997* and *Export Control (Animals) Order 2004* to require greater space for sheep travelling by sea to the Middle East using an allometric stocking density.

Consequently, the PGA supports Option 1: Regulatory status quo, because these regulatory enhancements have reduced the risk associated with heat stress.

However, this option must include regard for the risk of another heat stress event, like the Awassi incident, that may lead to a swelling of public and political pressure against live sheep exports.

It must have mechanisms in place that significantly diminish this risk.

Failing this, the PGA would support Option 2: Prohibition from 1 June to 14 September to all ports with additional prohibited periods for Qatar and Oman.

The PGA notes that Qatar accepts about a third of all Australian (that is WA) live sheep exports. An additional prohibition period for Qatar will extend the baseline moratorium from about 3.5 months to 4.25 months.

Suspensions of this length in the live export trade to the Middle East that excludes Australia from the market will force importers to source sheep from other countries.

Loss of market share could result in complete loss of the market. The Department must consider this risk when considering this option.

The PGA does not support Option 3: implement a revised HSRA model consistent with recommendations of the HSRA Review, as it could theoretically require a vessel to be fully de-stocked. Clearly this is unworkable.

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Yours Faithfully



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