**Submission to The Department of Agriculture regarding Live Export Regulation Impact Statement**

8 October 2019

Option 1
Three month prohibition—Conditions under the Middle East Order apply for the northern summer months and industry continue to use the existing HSRA model or agreed animal welfare indicators.

*There are no benefits to our sheep and cattle farming business and the impacts of Live Export are negative on our farming business, impacting on the reputations of all farmers and causing our customer base to mistrust our welfare practices, with many future customers for wool and meat embracing veganism.*

Option 2
Apply the 2019 prohibition period—Conditions under the Middle East Order apply for the northern summer months. The department would remove the requirement for a HSRA on live sheep export voyages to, or through, the Middle East.

*There must be a prohibition during the extreme ME summer period and the revised HSRA should obviously apply for all voyages. There are no benefits to our business and the impacts of Live Export are negative on our farming business.*

Option 3
Adopt a revised HSRA model with risk settings based on heat stress thresholds or agreed animal welfare indicators.

*Should apply on all voyages. With the prohibition during summer months. There are no benefits to our business and the impacts of Live Export are negative on our farming business.*

Option 4
No prohibition—live sheep exports to, or through the Middle East would be permitted 12 months of the year. Conditions under the Middle East Order apply for the northern summer months and industry continue to use the existing HSRA model.

*This is inhumane. A repulsive option as history has shown. There are no benefits to our business and the impacts of Live Export are negative on our farming business.*

**There is no policy option not stated here that would support a sustainable live sheep export trade AND meet the high animal welfare standards expected by the Australian community other than a TOTAL BAN**

We are not naïve enough to suggest this industry is not profitable for some, we are saying the economic benefits do not supersede the cruelty, the unethical practices and the sheer hatred for it from the general public which has a significant negative impact on all farming.

The Government has not been able to effectively regulate this trade, and it must base its decisions on science and evidence. Trusting the live exporters that have consistently and recklessly proven they are unworthy of that trust is no longer an option.
To consider weakening the moderate changes made in the last year is asking for the same level of suffering and further erosion of the public’s perception of farming and the govt. can expect further disastrous voyages with more fall out from the public not to mention the vile treatment of stock.

The Australian Meat Industry Council have in the past stated stock can be processed here. Rather than continually wasting resources by trying to prop up Live Export the Govt should be investing in infrastructure to send frozen to the same customers for live who currently import over $10b frozen from other suppliers like the US and Brazil.

A transition to boxed, chilled meat would benefit sheep meat processors by enabling them to value-add to sheep meat products rather than forfeiting this potentially lucrative opportunity to overseas meat processors via the live sheep export trade.

SA’s chilled sheep meat trade is worth 20 times more than live sheep exports. In 2016-17, the value of processed sheep meat exports from South Australia was around $500m, compared to the value of live sheep exports from South Australia of around $23m.

Clearly the Govt are protecting the WA live export trade however we do not know how the economics would change and whether additional market lines would open up for boxed meat – rather than live sheep – if the live trade were to be stopped. It is highly unlikely trade would cease or decrease for frozen.

**Sheepmeat and live exporters commitment to stock welfare?**

The government enacted the prohibition earlier this year to prevent sheep from being shipped to the Middle East from the beginning of June through to September 22 – the highest heat stress risk period. During this time, sheep are adapted to the cooler temperatures of a southern Australian winter. And for this reason they find it difficult to cope with the sudden increase in temperature and humidity as the transport vessels undertake the two- 4 week journey to the Persian Gulf region.

**YET SHEEP-MEAT PRODUCERS SENT A SHIP A FEW WEEKS BEFORE THE DEADLINE KNOWING TEMPS WOULD HIT THE HIGH 40’s FOR MOST OF THE JOURNEY.**

And following the Government suspension of the licence of biggest live sheep exporter for endemic and repeated cruelty Emanuel Exports attempted to change business entities to sneak more ships out. This is the grubby industry you are protecting at the expense of other farmers.

It’s a complete farce to suggest Live Export stakeholders have any concern for stock welfare. And the public know it.

We also note that the Govt have stepped back, ignored or flagged the reversal of most recommendations, including increases in space allowance for sheep on board and independent auditing of ship ventilation systems, and are apparently still suppressing parts of recent reports on the conditions of the last shipment in May 2019.

Live export is not farming. It is cruel exploitation of sentient animals that diminishes the reputations and erodes the future for all other meat and wool producers like us. Ban it.