“Live sheep exports to the Middle East”,
‘Have your say ‘
Submission process for the Live Animal Exports Division, Australian Department of Agriculture,
October 2019

By Dr Lynn Simpson
Introduction:

To Whom It May Concern;

As a Veterinarian, an Ex- AAV with 57 voyages experience sailing to or through the Middle East and as an Ex- Department of Agriculture Employee I submit the following opinions on the options paper that is the catalyst for yet another review by the current Department of Agriculture.

The reference information I base my opinions upon include but are not limited to:

- My 57 voyages to and through the Middle East with livestock
- The findings of the 1985 Parliamentary senate select committee review
- The Kinery review
- The Farmer review
- My experience as Technical Advisor for the DAFF ASEL review in 2012-13 (still not completed due to industry influence)
- The ongoing ASEL review/s
- Decades of Industry (MLA/LiveCorp) produced (often not published live export related R and D: Some of which I personally contributed to)
- The McCarthy Review
- The Moss Review
- The following HSRA including the modified version.
- The Independent Observer Reports that have been published in summary form since the atrocity that was the M.V Awassi Express footage was released to the public.
- Voyage and Mortality outcomes since the ‘Awassi’ express and the multitude of scientific reviews and investigations have been undertaken, especially highlighting the reduced sheep mortality rate since mitigation strategies of reduced stocking densities and avoiding high risk summer months have been implemented by the Dept Of Ag.

NB: I believe the department has access to all these references so I will not be wasting anyone’s time by adding them again.

This reference material provides scientifically robust and evidentiary proof that to indicate without doubt that none of the four options proposed by Australia’s Department of Agriculture are sustainable and are prioritizing the profits of few, over animal health and welfare.

This situation is damaging to the reputation of Australia’s Agriculture sector in a much broader sense than just the Live Export sector.

Regardless of shipping options chosen, it must be appreciated that none of these options provide protection to animals once unloaded from a vessel. Recent research released from MLA/ LiveCorp regarding their ‘dehumidification trial’ has clearly proven that the ships are not conducive to be easily and financially
viably dehumidified when loaded with sheep. It is not a sustainable option as mechanical mitigation strategies have a high risk of breaking down. This mitigation strategy of course cannot be implemented in a feedlot, truck or lairage in the Middle East.

**Question 1:** For each option, what do you consider would be the benefits to and impacts on you, your organization and the community? Please provide any supporting evidence or data that would aid in the assessment of impacts under each option.

The only **benefit** that any of the four proposed options would provide me would be to further vindicate my claims that the Department of Agriculture, regardless of a plethora of reviews etc as already referenced in the introduction, still puts the financial profits of a minority ahead of the health and welfare of millions of animals.

The **impact** of all four options to me would be to strengthen my animal health and welfare advocacy platform and global message, that the Australian Department of Agriculture ignores Veterinary, animal welfare and environmental science to prioritize the financial gain of a minute % of livestock producers and operators over the health and welfare of millions of animals from Australia. In the process, also damaging the global reputation of Australia as a country of scientific integrity and ethics.

**Question 2:** Is there a policy option not stated here that would both support a sustainable live sheep export trade and meet the high animal welfare standards expected by the Australian Community?

As no definition for ‘sustainable’ has been offered, one must believe it consists of one or all of the following:

- Able to be upheld or defended
- Able to be maintained at a certain rate or level
- Represent the ability to exist constantly. In the 21st century, it refers generally to the capacity for the biosphere and human civilization to coexist.

I don't believe there is a level of ‘acceptable’ sustainability of the live sheep export trade from Australia that would meet community and producer expectations or be defendable. Even if the lowest common denominator ‘of maintaining at a certain rate or level’ were to be the goal, the trade would continue to be plagued with disasters, increased poor practice expose's, the requirement for more wasteful reviews and growing condemnation globally.

This would potentially be damaging to the sustainability and current growth patterns being observed with the export of chilled and frozen sheep meat. Hence the inevitability that chilled and frozen meat exports will leave the live sheep export trade redundant. Transitioning all live animal exports of primary
production animals to a trade in chilled and frozen meat should be the option of choice and sustainability.

Exporting live sheep by sea, especially to the Middle East is very clearly a deliberate act to place animals into the risk of unnecessary harm. This is unacceptable and only becoming more understood with resistance to the practice growing globally and exponentially.

Any ‘option ‘adopted would need to include the scientifically determined need to avoid the highest risk times of the year with a trade moratorium from May to October (Inclusive). This option would also require the greatest allometric stocking density to be adopted as no amount of space can mitigate heat stress in the environs of these ships in the Middle East during likely extreme heat challenges. The Option would also have to adopt the revised HSRA model (Welfare) immediately for all voyages.

**Question 3: The Department is developing an information base to support ongoing analysis and improvements to live animal export regulation. This includes environmental data collected on board live export voyages. What other data should the department consider collecting?**

The Department should be drowning in data that has already been collected and is indicative of the issues at hand. Regardless of much of it like temperature monitoring knowingly have been taken at times of the day that did not indicate the maximums.

As such the ships should all be fitted with electronic, non-tamper able data loggers that measure Dry bulb Temperatures, Wet Bulb Temperatures, Relative Humidity, Carbon dioxide levels and Ammonia levels.

Assessment of this data should solidify that the greatest heat mitigation strategy possible should be immediately implemented.

**Conclusion:**

It is my belief and experience that none of the four options provided for consideration are in the best interests of either the animals, Agriculture Australia or Community expectations.

Ideally a complete transition to chilled and frozen meats, and frozen embryos and sperm to avoid live export would be my option of choice.

Otherwise nothing short of a sheep trade moratorium to the middle East from May to October (inclusive) with the greatest allometric stocking density providing as much space as possible as indicated in the revised HSRA model (welfare).

Sincerely
Dr Lynn Simpson