



4<sup>th</sup> November 2019

Department of Agriculture  
Live Animal Exports division

### **Middle East sheep exports policy options discussion paper**

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.

In reacting to Consignment 69. Sheep exported by sea to Qatar, Kuwait and United Arab Emirates in August 2017 where the cause of this reportable mortality was heat stress, the Commonwealth Government reacted to a special cause variation.

This unfortunate episode was the result of a special combination of almost unique circumstances, including weather conditions, diplomatic crises and decision making by maritime authorities at that time.

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As a result, the Commonwealth Department of Agriculture took the following actions;

- ✓ 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.

In effect all live sheep export voyages have now been regulated according to a special cause.

The PGA supports this view by reference to the Department's Regulatory compliance investigations web page, which demonstrates that apart from Consignment 69, all complaints and investigations for 2018 and 2019 relate to ESCAS requirements.

Historic MLA research over the last 15 to 20 years also shows that persistent inanition and salmonellosis have been considered the most important causes of death in exported sheep, with most deaths occurring during the shipment phase of the export process.

Consequently, the PGA supports Option 4: No prohibition, but with the enhancements to regulatory control listed above that resulted from Consignment 69.

It is the PGA's view that these regulatory enhancements have significantly reduced the risk associated with heat stress. Again, this is reflected in the recent complaints and investigations history on the Department's Regulatory compliance investigations web page.

As the discussion paper recognises in options 1, 2 and 4, allometric stocking density has significantly reduced the numbers of sheep allowed on voyages during the northern summer, and this has moderated the release of animal body heat on board ships that contributes towards heat stress.

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The PGA expects that livestock exporters will conduct a rigorous risk assessment on all voyages during the northern summer that considers the heat stress effect on animal welfare before a “go” decision is made.

The PGA also notes that the Secretary of the Department has discretion in granting any export permit.

Failing this, the PGA would support Option 2: apply the 2019 prohibition period, as this option, although it includes a prohibition, has at least been tried under actual operating conditions.

The PGA does not support options 1 or 3, as these have the potential to result in an increase in the current prohibitions.

Lengthy pauses in the live export trade to the Middle East that vacates Australia from the market, will force importers to source sheep from other countries, as demonstrated by the recent media reports about the KLTT livestock carrier Al Shuwaikh loading around 57,000 sheep in South Africa for transport to the Middle East.

Loss of market share could result in complete loss of the market.

Yours Faithfully



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