

Submission on the Live Sheep Exports to the Middle East Policy Options Discussion Paper

I appreciate the opportunity to provide this submission on the Live Sheep Exports to the Middle East Policy Options Discussion Paper.

In summary, none of the four options addresses satisfactorily any of the community's concerns about animal welfare in the export of live animals and the only acceptable option is for live sheep, and indeed any live animal, exports to cease.

In stating this, I appreciate all of the previous research and assessments upon which the options are based, but there is no option for no exports and this is a serious omission.

I address each option below, noting that these are labelled 'ideas':

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.

The HSRA model, while it may perhaps be technically sound in its measurements of heat and congestion, seems to have factored in one outcome only – death i.e. sheep either die or they don't.

While this might be economically justifiable in terms of an 'acceptable' percentage loss, it is abhorrent in terms of the well-being of the sheep overall and is massively inconsistent with any option purporting to address animal welfare. The sheep are stressed from the outset and the conditions of this trade only increase that stress massively. But that stress is only measured in terms of a percentage of sheep that die, somewhat limited by any definition. Clearly, no trade will mean no deaths!

The significant distance from Australia to the Middle East across oceans and particularly the Equator completely bankrupt the farcical notion of the 'northern summer' as the sole heat stress benchmark for the already deficient HSRA. Clearly, the application of any comprehensive and meaningful stress measures should be for any time of the year. And such an application would necessarily effect a total prohibition.

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.

This option is worse than option 1 with not even the HSRA percentage of deaths through heat stress measure factored in.

It also seems that this option is a sop to the exporters who would then be able to claim everything outside of the 'northern summer months' as favourable weather conditions because it does not take account of the weather variables throughout the journey or of any of the other significant stress factors inherent in shipping live animals in cramped and damaging conditions over a long distance.

And it also makes a mockery of statements that "live animal exports won't be conducted at the expense of animal welfare" and if these are to be more than just vapour platitudes, all live animal exports would have to be stopped.

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

It is uncertain what a revised HSRA model would achieve or is intended to achieve other than tinkering at the margins and more procrastination. A revised percentage of sheep deaths perhaps?

The suggestions put forward in justifying this option are still limited to a heat stress level based on the Middle East destination; an insignificant reduction in numbers of animals transported, and marginal increases in the sizes of their containers.

I acknowledge that the standards for the sea transport of livestock do address the broader issues, and I admit to having no familiarity with the details and associated complexities, but one matter does stand out namely the nexus between the economic viability of live animal exports and the measures necessary to maintain anything like an acceptable level of animal welfare, with the former clearly being the determining priority.

In short, there can be no provisions made for sheep or any other live animal exports that would ensure proper animal welfare standards.

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 clearly not acceptable under any circumstances.

Option 5 – Cease all live animal exports

There are effective alternatives which can mitigate the loss of current trade and income; significantly enhance/maintain animal welfare; and create domestic jobs and growth. Principally, slaughtering the animals in Australia and exporting the chilled product by air being less weight, leading to fresh and quality delivered product, and causing no stress to animals or people. Win-win-win.

While religious issues are significant, satisfactory halal slaughter and processing methods can surely be established and verified. Indeed, there are already halal meat processing facilities in Australia.

Such facilities could be owned by Middle East enterprises and staffed by local halal-certified people.

It really doesn't seem to be too difficult to achieve this and it would certainly remove the community's disquiet and objections; the threat to income and increasing regulation concerns of exporting producers; and the impact on Governments and agencies such as the Department of Agriculture when transported animals die and/or are mistreated both en route and at their destination.

We should surely be able to determine what is exported and the manner in which it is exported.

Keith Simpson