22nd October 2019

Department of Agriculture
GPO Box 858
CANBERRA ACT 2601

RE: Submission in response to the Department of Agriculture 2019, Middle East sheep exports policy options discussion paper, informing future regulation of live sheep exports to or through the Middle East from 2020 onwards.

I am providing this submission on behalf of the Stud Merino Breeders' Association of WA, with support for the suspension of trade to the Middle East between the period from the middle of June to the middle of September until and if risk assessment data is established which indicates a review is required.

As outlined in the ASEL Review Technical Advisory Committee 2018, Review of the Australian Standards for the Export of Livestock: Sea Transport—final report, the development of a single definitive cost model for assessing the cost/benefit of changes to live export regulation is hard to quantify, as the number of variables in the export process are so large as to prejudice the development of one. However, what can’t be disputed is the proportion of live export coming from WA and the extent of the impact of changes in this sector across the supply chain as outlined in the Mercado report released in September 2019, Value Analysis of The Australian Live Sheep Export Trade. This report, commissioned by LiveCorp and mla, reiterates the importance of Live Export as an economic determinant of the sustainability of the WA sheep industry and affiliated supply chain industries. Even with the reduction in volume of live sheep exported in recent years the industry is still viewed as a viable industry, but certainty of supply is critical to maintaining our live export trading partners in the Middle Eastern markets.

May is an important month for WA producers, who are assessing the management of pasture after the summer period. Rainfall at this time of year creates a break in the season and makes this an important time for making on-farm decisions regarding stock carrying capacity over winter months. If seasonal feed availability does not allow the retention of wethers during winter months it is important that the live export industry creates a market opportunity for this surplus livestock. Selling wethers at this time of year if feed availability is limited allows farmers to manage pastures in preparation for lambing. Uncertainty around the having the option to sell to live export markets at this time of year means that there may be greater security in utilising land for cropping rather than grazing. Whilst the live export market provides competition and therefore, better prices for producers, having certainty of demand via live export encourages producers to stay in sheep with the flow on effect being more consistent and sustainable sheep supply for the local processors.
The exporters are working hard to make significant changes including regulatory reform imposed over the past 12 months to the live export process and is a demonstration of their determination to keep the industry going into the future.

The ASEL report also highlighted that improvements to animal welfare outcomes in live export may come from outside the regulatory framework such as the working relationship of employees on voyages or through the concept of ‘equivalence’ and therefore the success of the live export trade may also lie with the willingness of regulators to work with industry to ensure the longevity of sheep live export into 2020 and beyond.

Yours sincerely

Scott Pickering
(President SMBAWA)