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REVIEW

**REVIEW OF LIVE SHEEP
EXPORTS BY SEA TO, OR
THROUGH, THE MIDDLE
EAST DURING THE
NORTHERN HEMISPHERE
SUMMER**

AN ANIMAL LIBERATION SUBMISSION


DEPARTMENT OF AGRICULTURE, WATER AND THE ENVIRONMENT

We acknowledge the
Traditional Owners of
country throughout
Australia and recognise
their continuing
connection to land, waters
and culture.

We acknowledge that this
document was written on
land stolen from and
never ceded by the
Gadigal People.

We pay our respects to
their Elders past, present
and emerging.





We don't have a duty to **speak** for the animals;
we have an obligation to be **heard** for the animals.

Matt Ball (2006)

DOCUMENT DETAILS

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ABOUT ANIMAL LIBERATION

Animal Liberation has worked to permanently improve the lives of all animals for over four decades. We are proud to be Australia's longest serving animal rights organisation. During this time, we have accumulated considerable experience and knowledge relating to issues of animal welfare and animal protection in this country. We have witnessed the growing popular sentiment towards the welfare of animals, combined with a diminishing level of public confidence in current attempts, legislative or otherwise, to protect animals from egregious, undue, or unnecessary harm. Our mission is to permanently improve the lives of all animals through education, action, and outreach.

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28 January 2022



Animal Welfare Branch
c/o Livestock Welfare Analysis and Reviews Section
Department of Agriculture, Water and the Environment
Via email: animalwelfare@agriculture.gov.au.

We present this submission on behalf of Animal Liberation.

Animal Liberation is grateful to the Department of Agriculture, Water and the Environment ('DAWE' or 'the Department') for the opportunity to lodge a submission in response to the Draft Review of live sheep exports to, or through, the Middle East during the Northern Hemisphere summer.

In compiling our submission, Animal Liberation has reviewed and considered key documents including, but not limited to, the Draft Report Review of live sheep exports by sea, the Middle East live sheep trade climate analysis 2021 update, the Regulation impact statement – Live sheep exports to, or through, the Middle East – Northern Hemisphere summer, and the Australian Standards for the Export of Livestock.

We request that it be noted from the outset that the following submission is not intended to provide an exhaustive commentary or assessment in response to the issues contained within the Draft Review and/or and corresponding documents.

Rather, our submission is intended to provide a general examination and responses to select areas of key concern. As such, the absence of discussion, consideration or analyses of any particular aspect or component must not be read as or considered to be indicative of consent or acceptance. For the purposes of this submission, Animal Liberation's focus covers aspects that we believe warrant critical attention and response.

Kind regards,

Alex Vince
Campaign director

Lisa J Ryan
Regional campaign manager



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— PREAMBLE

- 1.1 According to the DAWE website, the Department is currently reviewing the regulatory settings for live sheep exports to, or through, the Middle East during the Northern Hemisphere summer. The review claims to build on an independent review of the conditions for the export of sheep ('the McCarthy review') in 2018, and a regulation impact statement process completed in 2020.
 - 1.1.1 The review considers voyage outcomes and the appropriateness of the current regulatory settings applying to live sheep exports during the Northern Hemisphere summer in reducing the occurrence of heat stress and heat stress-related mortalities. The report also considers the efficacy of the current regulatory settings in ensuring the sustainability of the live sheep export industry.

- 1.2 As part of the current review, DAWE has produced a draft report to enable public feedback and the draft report is informed by:
 - 1.2.1 voyage data and reports;
 - 1.2.2 scientific literature, and;
 - 1.2.3 Bureau of Meteorology ('BOM') data and climate analysis

- 1.3 Public feedback is intended to ensure that the final report addresses all relevant aspects of temperature stress in relation to the export of live sheep to the Middle East during the Northern Hemisphere summer.
 - 1.3.1 The over-whelming evidence confirms unacceptable suffering, cruelty and death for sheep and other animals subjected to the risks, impacts and horrors of the live export trade. This is notably so during lengthy sea journeys. Large numbers of sheep die virtually every month of the year and that heat stress is reported (in Independent Observer reports) in December, January, March, April, May, October, and November, as well as the "recognised high-risk" months of June-September.
 - 1.3.2 Ultimately, all Middle Eastern countries Australia export live animals to, except Israel and Turkey, all import chilled "beef" and/or sheep flesh from Australia, which removes all risk of heat stress and other needless and senseless on-board death and suffering caused by the Live Export trade.

- 1.4 Animal Liberation is strongly opposed to any shortening of the moratorium period, and in fact we contend, it should be extended to cover at least May and October, however we also maintain, there is no month in which sheep en route to the Middle East do not suffer from heat stress, and there is no month in which large numbers do not die on board.



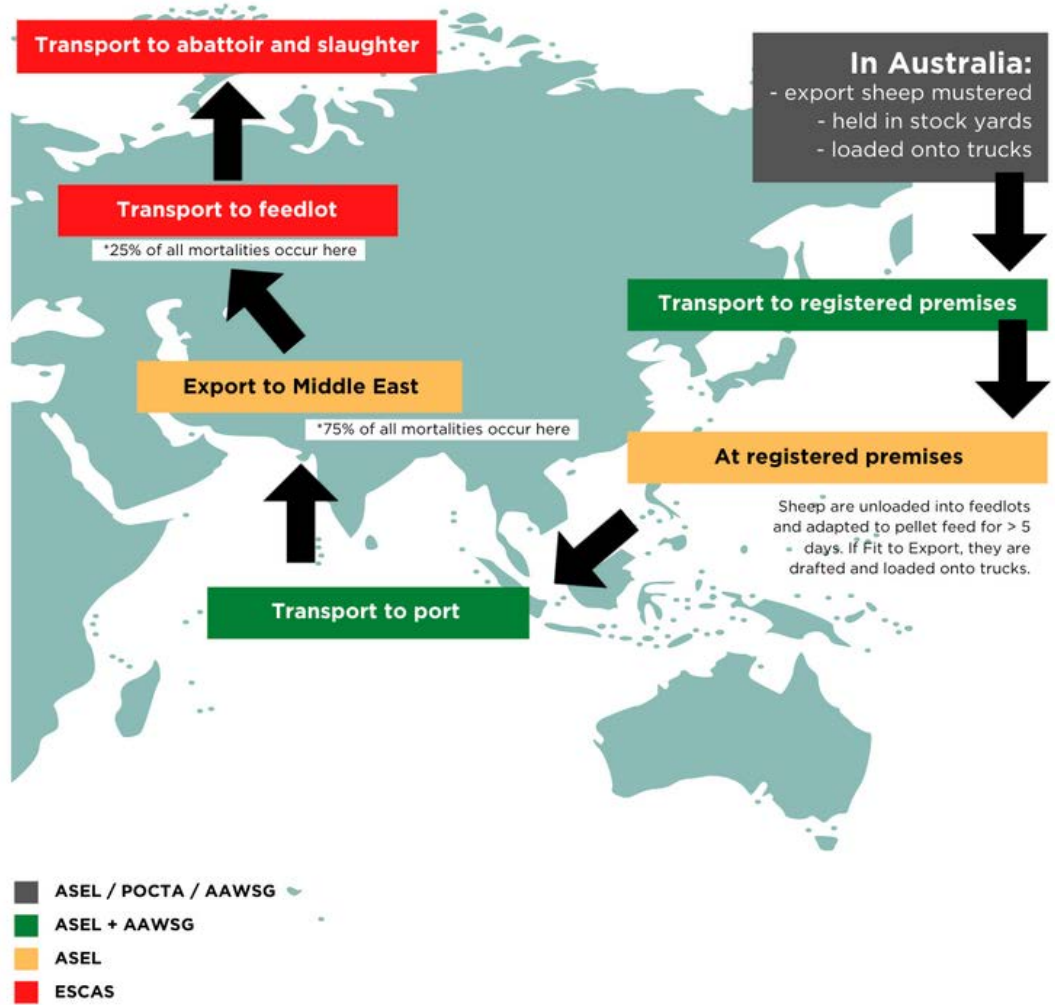
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— BACKGROUND AND INTRODUCTION

- 2.1 With between 70-80% of income derived from international trade, Australia's agricultural production is predominantly export-focused (Jackson and Adamson 2018). Australia is the largest exporter of agricultural animals (Phillips and Santurtun 2013) and has one of the largest live export industries in the world (Chaudhri 2014) that constitutes approximately 0.5% of the export market (DFAT 2020). Though Australia has historically exported a range of animals to over sixty (60) nations (DAWE 2021a), the majority are sheep (DAWE 2021b). In 2018/19, nearly one million sheep were exported live from Australia (LiveCorp 2019). Over 80% are produced in Western Australia (DPIRD 2020) and most are subsequently exported to the Middle East (MLA 2019). The largest markets are Kuwait (~34%), Qatar (~24%) and Jordan (~18%) (DPIRD 2020).
- 2.1.1 The earliest recorded examples of live sheep export are domestic and were between Tasmania and Victoria in the mid-1830s (SCAW 1985). Between 1885 to 1889, the first cattle shipments were sent from the Northern Territory to Hong Kong, Singapore and Indonesia (Petrie 2019). These were soon suspended, however, in response to disease outbreaks (Keniry 2003). The demand for live sheep in the Middle East is due to ongoing ritual slaughter and the provision of Halal-certified meat to consumers in the absence of sufficient cold chains (Jackson and Adamson 2018).
- 2.1.2 The sheer scale of operations alone warrants the development of animal welfare assessment tools tailored to the conditions experienced at the various steps of the supply chain (Fleming et al. 2020a). At present, the industry uses on-board mortality and compliance with the Australian Standards for the Export of Livestock ('ASEL') and Exporter Supply Chain Assurance System ('ESCAS') as indicators of welfare (DAFF 2011a; DAFF 2011b). These will be further discussed in the relevant subsection of this submission.
- 2.2 Trade with the Middle East began in the 1960s with ships loaded at Fremantle or Adelaide and unloaded at ports in the Persian Gulf (SCAW 1985). During this time and into the 1970s, trade expanded with the development of ships with the capacity to transport up to 50,000 sheep (Petrie 2019). In the early 1980s, a government-sponsored mission, composed of industry and union representatives, attended the Middle East to study local sheep meat markets (DPI 1982). The Government subsequently announced an agreement with the industry and unions to establish a market development fund under the auspices of the Australian Meat and Livestock Corporation ('MLC') (Petrie 2019). A year later, the

- 2.2 Australian Livestock Export Industry Advisory Committee was established in response to high mortality rates during transport (Petrie 2019).
- 2.3 Most sheep exported live from Australia are sourced from Western Australia and sent to the Middle East (Caulfield et al. 2014). Though such voyages take an average of between 20-21 days (Caulfield et al. 2014; Phillips 2020), a voyage bound for the Middle East from Fremantle can take between three to five weeks (DPIRD 2020). Industry reports indicate that mortality rates on these voyages are approximately four (4) times greater than for shorter voyages elsewhere in the world, such as those to South-East Asia (Norris and Norman 2012).
- 2.3.1 Australia also exports boxed sheep (lamb and mutton) meat to the Middle East as chilled and frozen product. The previous decade has seen significant growth in this sector, with exports increasing by over 180% in between 2009 and 2019 (DPIRD 2020).
- 2.4 The regulatory framework for livestock exports from Australia is complex. Though the Federal Department of Agriculture, Water and the Environment ('DAWE' or 'the Department') oversees and regulates the Australian live export industry, there are a number of regulatory responsibilities that are undertaken by other authorities. These include the Australian maritime Safety Authority ('AMSA') and state departments, such as the Western Australian Department of Primary Industries and Regional Development ('DPIRD'). DAWE, however, administers the Australian Standards for the Export of Livestock ('ASEL') and the Exporter Supply Chain Assurance System ('ESCAS').
- 2.5 The regulatory framework includes:
- 2.5.1 The Australian Meat and Live-stock Industry Act 1997;
- 2.5.2 The Australian Meat and Live-stock Industry (Export Licensing) Regulations 1998;
- 2.5.3 The Australian Meat and Live-stock Industry Regulations 1998;
- 2.5.4 The Australian Meat and Live-stock Industry (Export of Live-stock to Saudi Arabia) Order 2005;
- 2.5.5 The Export Control Act 1982;
- 2.5.6 The Export Control (Animals) Order 2004.

Fig. 1: Basic regulatory schematic adapted from AVA (2018)



ADAPTED FROM AVA 2018



SUBMISSION

SUMMARY

- 3.1 Animal Liberation understands that the Draft Review intends to address the Australian Government’s commitment to consider the efficacy of regulatory arrangements applicable to the live export of sheep by sea to, or through, the Middle East during the Northern Hemisphere summer (i.e., 1 May to 31 October) and that these arrangements were implemented in response to a Regulation Impact Statement (‘RIS’) process finalised in 2020 (DAWE 2021c: 6).
- 3.2 The Draft Review explains that the previous Review of the Regulatory Capability and Culture of the Department in the Regulation of Live Animal Exports (Moss 2018) acknowledged that “the welfare of exported animals is of significant interest to the Australian community” (DAWE 2021c: 6). The purpose of this review (‘the Moss Review’) was to assess the capability, powers, practices and culture of the Department as regulator of live animal exports in providing assurance to both the Commonwealth and the Australian public that standards and regulations were being met by the industry. It maintains, however, that “public confidence in the live sheep export trade and the department as a regulator was undermined by heat stress events in exported sheep that occurred in 2017” (ibid).
- 3.2.1 In August 2017, details emerged describing the extreme conditions in which up to 3,000 sheep died from heat stress caused by extreme humidity en route to the Middle East (Logan 2017). In April 2018, footage depicting live sheep suffering severe heat stress while being transported to the Middle East over five voyages between May and October 2017 was released (DAWE 2019). A review, known as the McCarthy Review, was announced by the then Minister for Agriculture and Water Resources as part of the Government’s response to the 2017 incident (McCarthy 2018).

ANIMAL WELFARE

- 3.3 Animal welfare is of increasing public concern worldwide (Rousing et al. 2001; Schipp and Sheridan 2013; Colditz et al. 2014; Futureye 2018). It was identified as an international priority by the World Organisation for Animal Health (‘OIE’) over two (2) decades ago (OIE 2000).¹

¹ See recommendation six (6) of the OIE’s Third Strategic Plan 2001–2005 (OIE 2000).



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3.3.1 Animal welfare is an important issue for the live export industry for three (3) key reasons: 1) economic returns, 2) community attitudes and 3) international socio-political relations (Fleming et al. 2020a). Social concern for the welfare of animals in the Australian live export industry is significant (Willis et al. 2021). The industry receives frequent media and advocacy attention (Hastreiter 2013; Coleman 2018; Sinclair et al. 2018; Buddle and Bray 2019), particularly in response to incidents involving adverse welfare outcomes in countries receiving Australian animals (Munro 2015; Hampton et al. 2020). These incidents often generate debate on whether the trade should be banned or be more rigorously regulated (Chaudhri 2014). As such, the trade remains deeply controversial. ¹

3.4 Human-animal interactions are a significant contributor to animal welfare outcomes during transport and within production systems (Hemsworth and Coleman 2011; Burnard et al. 2015) as interactions can positively or negatively impact animal well-being (Willis et al. 2021). The role of human-animal interactions is considered to be sufficiently profound as to be explicitly included as a measurement in emerging animal welfare assessment methods (Mellor et al. 2020). Recent surveys have found the attitude and competency of people employed by the live export industry to be two (2) of the top three (3) most important welfare factors (Fleming et al. 2020b). These complement and support earlier findings that handling practices are a critical factor influencing animal welfare outcomes in the industry (ABC 2011; Doyle et al. 2016) and others that have found attitudes, beliefs and understanding of animal welfare to be critical determinants of their likely interactions with animals (Hanna et al. 2009; Hemsworth and Coleman 2011; Daigle and Ridge 2018; Munoz et al. 2019).

3.4.1 Surveys have found that a significant portion of the Australian community believe many employees in the live export industry do not have sufficiently high regard or concern for animal welfare (Buddle et al. 2018). While this corresponds with concerns for employee attitudes in other animal-use industries (Daigle and Ridge 2018), other sectors have not been assessed to the same degree as the live export industry (Willis et al. 2021). Surveys have been conducted to specifically address societal opinions on animal welfare in the live export industry (Futureye 2018; Sinclair et al. 2018; Moffat 2020).

3.5 In the live export industry, interactions between animals and people involve critical decisions that directly impact animals. These include decisions throughout the supply chain, such as monitoring, resource and health care provision and reporting on welfare outcomes (Willis et al. 2021).

3.5.1 As the trade involves transporting animals on a global scale, exported animals traverse several supply chains and are handled by people from different backgrounds with a range

3.5.1 of expertise and experience (Hemsworth et al. 2011; Descovich et al. 2019; Balzani and Hanlon 2020; Willis et al. 2021). Studies have found that interactions and management practices undertaken early in the supply chain can increase or intensify adverse animal welfare outcomes (Fleming et al. 2020a).

3.6 Studies have identified a range of factors that influence the attitudes and approach of employees toward animal welfare and many of these apply to employees in the live export industry (Willis et al. 2021). Demographic factors, including gender, religion and experience, are influential (Sinclair et al. 2017; Descovich et al. 2019). So too are training levels (Hemsworth et al. 2011; Balzani and Hanlon 2020) and working conditions, including salary and job satisfaction, as an influence on employee attitudes (Daigle and Ridge 2018).

3.6.1 Despite the critical role played by employees in the live export industry, they remain overlooked during decision making processes or regulatory reform (Willis et al. 2021). In addition, employees represent a resource in the identification of emerging welfare issues and the development or implementation of potential solutions (Daigle and Ridge 2018; Sinclair and Phillips 2019).

3.7 In response to poor practices in facilities receiving Australian animals, the Export Supply Chain Assurance System ('ESCAS') was developed and introduced in 2011 (ABC 2011; DAWE 2020a). The intention of ESCAS is to ensure that the handling and slaughter of animals exported from Australia meet the World Organisation for Animal Health ('OIE') recommendations upon arrival in receiving nations (Willis et al. 2021). Despite its development and introduction, however, surveys have found ongoing concern for exported animals (Buddle et al. 2018; Fleming et al. 2020b). Industry is aware of these concerns (Sinclair et al. 2018; Hampton et al. 2020).

3.7.1 Previous reviews of the industry have provided recommendations to improve animal welfare and monitoring. The 2011 Farmer review recommended the adoption of a Quality Assurance ('QA') system inclusive of all sectors within the supply chain that could complement existing regulatory programs (Farmer 2011). In 2018, the McCarthy and ASEL reviews also recommended the industry cease relying on mortality as the primary indicator of animal welfare (Australian Government 2018; McCarthy 2018). The latter was supported by stakeholders because it was regarded as an opportunity to exhibit best practice and avoid adverse publicity (Fleming et al. 2020b).

3.7.2 A particularly pressing problem with monitoring mortality and non-compliance with regulation is that issues can only be declared retrospectively (Fleming et al. 2020a).



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- 3.8 The market structure outlined elsewhere in this submission means that the Middle East region has monopsony control over the industry, making it vulnerable to any restrictions or obstructions to market access (Jackson and Adamson 2018).
- 3.8.1 Consider, for example, examples of events that have halted trade with the Middle East. First, Saudi Arabia's rejection of sheep due to scabby mouth (pustular dermatitis or "orf") in 1990 led to market closure for eleven (11) years (McCarthy 2012). Second, the Saudi Arabian market was again closed in 2003 when the vessel Como Express, carrying 58,000 sheep, was rejected due to concerns surrounding the presence of scabby mouth (Anon. 2003; Jackson and Adamson 2018). Prior to market closure, Australia exported up to 1.2 million sheep to Saudi Arabia in a single year (Thompson 2021). Though similar shipment rejections have occurred, including Bahrain's rejection of 22,000 Australian sheep² over concerns that they were infected with scabby mouth (Wroe 2012) and the Ocean Drover and Al Shuwaikh incidents of 2012 (Jackson and Adamson 2018), the earlier incidents triggered changes to the 1982 Export Control Act and policy developments, including the introduction of the Australian Standards for the Export of Livestock ('ASEL') and the Exporter Supply Chain Assurance System ('ESCAS') (Jackson and Adamson 2018).
- 3.8.2 In April 2021, reports indicated that live sheep exports would resume after the hiatus outlined above (Thompson 2021).
- 3.9 Humidity refers to the amount of water vapour in the air: as temperatures rise, the amount of vapour also rises (LiveCorp and MLA 2022). The HRSA model is used to determine space allocations in order to minimise mortality (DAWE 2019).

BRIEF OVERVIEW OF HISTORICAL AND CONTEMPORARY REVIEWS AND RECOMMENDATIONS

THE AUSTRALIAN BUREAU OF ANIMAL HEALTH REVIEW (1981)

- 3.10 One of the first live export disasters occurred on 27 March 1980 when one crew member and over 40,000 sheep died when Farid Fares caught fire and sank en route from Tasmania to Iran (SCAW 1985). In response to subsequent critiques of the trade, the Government sent an Australian Bureau of Animal Health ('ABAH')

² Bahrain's 2012 rejection triggered an "animal welfare scandal" (Thompson 2021) as up to 6,000 sheep died before the Australian Government "gifted" the survivors of the otherwise rejected shipment to Eritrea after the UAE and Pakistan refused (Fickling 2003).

3.10 veterinarian on board a live export vessel to assess the health, welfare and handling of sheep during transport (Petrie 2019). The following year, the ABAH published a report on these assessments that noted a need for improved practices, particularly in response to the trade's relatively rapid growth. This was on the basis that investigators had found evidence of unskilled employees improperly handling sheep and animals suffering from poor conditions or ventilation (ABAH 1981). As such, the report recommended:

3.10.1 increased veterinary supervision, particularly at critical stages;

3.10.2 the commission of additional research into the needs of sheep, including ship design, disease prevention, waste disposal and food provision and;

3.10.3 ongoing program of inspections and reporting to the ABAH (ABAH 1981).

THE EXPORT CONTROL ACT AND THE AUSTRALIAN MEAT AND LIVE-STOCK CORPORATION AMENDMENT ACT (1982)

3.11 In 1982, in response to allegations of fraud and meat substitution, the Australian Parliament passed the Export Control Act and the Australian Meat and Live-stock Corporation Amendment Act (Petrie 2019). All existing export licences were withdrawn and new applications were subsequently required to meet integrity criteria.

THE MCCARTHY REVIEW (2018)

3.12 The McCarthy Review found that the central health and welfare issues during live export to the Middle East during the months of May to October are stocking density, ventilation and thermoregulation of sheep (McCarthy 2018: 3-4). As such, it made a range of recommendations in response to these factors. The key recommendations were:

3.12.1 a shift away from using mortality rates as a measure to a focus on measures that reflect animal welfare;

3.12.2 an adjustment to the risk settings contained in the Heat Stress Risk Assessment ('HSRA') to "better reflect community expectations";

3.12.3 the adoption of holistic ("allometric") principles to space allocation on live export vessels from Australia to the Middle East;

- 3.12.4 the independent verification of the fresh air moving through each deck of a vessel or its pen air turnover ('PAT') and;
- 3.12.5 a reduction in the reportable level for sheep exported from Australia to the Middle East from 2% to 1%.

3.13 McCarthy noted that these recommendations, which contained a range of new settings that the Review maintained should be actioned immediately, would likely impose restrictions on many vessels (McCarthy 2018: 4). Despite this, the Review maintained that it was essential for the industry to "place a much stronger emphasis on animal welfare", particularly through a shift away from measures that used mortality rates as a benchmark. It concluded that such changes would "involve a quantum shift in attitude and behaviour" (ibid).

- 3.13.1 In 2014, a report issued by the Commonwealth indicated that mortality exceeded the reportable level of 2% in two (2) consignments of sheep bound for Qatar and the United Arab Emirates ('UAE') (Hurst 2014).

THE MOSS REVIEW (2018)

3.14 In April 2018, the Minister for Agriculture and Water Resources commissioned an independent review into the regulatory capability of the Department in relation to live export regulation. Its objectives were to evaluate the ability, powers, practices and culture of the Department in assuring that animal welfare standards were being met. The Moss Review represents the third review of its kind in fifteen (15) years (RSPCA Australia 2018a).

- 3.14.1 The Moss Review assessed the regulatory capability and culture of the Department in its regulation of live exports (IGLAE 2020). It found "a culture of fear" within the Department that impeded staff from reporting concerns about animal welfare (Jasper and Sullivan 2018). The "damning report" explained that the Department "lacks the basic expertise to detect when animal cruelty is being perpetuated" and that when problems are discovered the "culture of fear and cover-up prevents them from properly addressed" (Iggulden 2018).

3.15 The Moss Review provided a range of recommendations. These include recommendations to:

- 3.15.1 ensure the Standards are regularly reviewed to reflect emerging concerns, including community expectations;
- 3.15.2 clarify the interactions between Federal and state or territory animal welfare laws regarding live exports;

- 3.15.3 develop comprehensive animal welfare indicators relating to each point of the supply chain and incorporate these into the regulatory framework;
- 3.15.4 take steps to prescribe the Standards as regulated standards, including appropriate penalties;
- 3.15.5 develop an approach that stimulates and incorporates best practice to ensure constant improvements in animal welfare outcomes;
- 3.15.6 introduce full, random and unannounced inspections of consignments;
- 3.15.7 recognise the valuable contributions of animal protection organisations in identifying non-compliance;
- 3.15.8 ensure mortality and non-compliance is investigated by appropriately trained staff;
- 3.15.9 ensure the Department receives appropriate and sufficient reporting to assess the health and welfare of animals during export;
- 3.15.10 enable on-board veterinarian and independent observation;
- 3.15.11 re-establish an Animal Welfare Branch and "place animal welfare at the centre of its regulatory activities";
- 3.15.12 ensure that the Inspector-General of Animal Exports ('IGLAE'), as an independent entity, oversee the Department;
- 3.15.13 ensure that any issues or concerns raised by staff be addressed in a transparent and timely manner;
- 3.15.14 ensure that accredited veterinarians or other authorised officers declare conflicts of interest;
- 3.15.15 establish a Principal Regulatory Officer in order to ensure that staff remain engaged in regulation and develop a culture of professionalism;
- 3.15.16 facilitate a "cultural shift" away from the identified "culture of fear".
- 3.15.17 collaborate with industry and the Australian Maritime Safety Authority ('AMSA') in the development of an automated, on-board animal welfare monitoring system;

- 3.15.18** engage with states, territories and other stakeholders to develop national animal welfare coordination in order to improve animal welfare outcomes;
 - 3.15.19** demonstrate "joint unequivocal commitment to animal welfare" between the Department and industry;
 - 3.15.20** establish appropriate community forums to enable awareness of current and emerging public expectations;
- 3.16** The range and scope of the recommendations outlined in subsections **3.15.1- 3.15.20** provide a synopsis of the sweeping animal welfare issues inherent in the live export trade.
- 3.16.1** Despite the damning findings and revealing recommendations of the Moss Review, the RSPCA concluded that its contents were not sufficient to rehabilitate the industry. Senior Policy Officer, Dr. Jed Goodfellow, maintained that "The government is kidding itself if it thinks the Moss Review recommendations are going to fix the live sheep trade" (RSPCA Australia 2018a).
 - 3.16.2** Similarly, the RSPCA concluded that the Moss Review was published less than two weeks after the Department approved a new licence for the Kuwait Livestock and Trading ('KLTT') company's Australia subsidiary, Rural Export Trading WA ('RETWA') (RSPCA Australia 2018b). The latter has strong links with the notorious live export company Emanuel Exports, which was charged with the breaching of animal welfare laws that ultimately led to the federal "crackdown" on the Middle East trade (Wahlquist 2019). Despite this, Emanuel Exports' licence was renewed after the three-year ban in late-2021 (Hayes et al. 2021).



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CONCLUSION

- 4.1 If the proposed recommendations are approved and implemented, more sheep will be exposed to heat stress at levels that far exceed those which are safe and comply with evidence-based animal welfare science.
- 4.1.1 At present, the live export of sheep to and through the Middle East, through the Northern Hemisphere is prohibited for 14 weeks. The proposed recommendations would see a reduction of the 14 weeks, resulting in larger numbers of sheep being exported during hotter periods. Of serious concern is that reducing prohibitions on exports to Kuwait, Qatar and the Red Sea will impact more than 85% of the hundreds of thousands of sheep exported from Australia each year (RSPCA Australia 2022).
- 4.2 As has been a consistent and frustrating occurrence through the public debate about the live export trade, the proposed recommendations ignore the advice of scientific and industry experts that asserts sheep should not be exported during the Northern Summer from 1 May to 31 October.
- 4.2.1 The Australian Veterinary Association ('AVA') and the Heat Stress Risk Assessment ('HSRA') Review Technical Committee have both recommended against exporting sheep during this time due to the extreme weather conditions (DAWE 2019; AVA 2020). Available expert advice in fact indicates that rather than reduce the prohibition period, we should extend it.
- 4.3 It is imperative that government honour previous public commitments and recommendations, including the prohibition period and those outlined in section 3 of this submission, rather than seeking ways to wind back animal welfare considerations for an industry which is rightfully condemned by the Australian and international community.
- 4.4 The current prohibition, which represents a bare minimum that we contend should be increased, does prevent a number of sheep deaths each month and an extension would ensure an even more positive outcome.
- 4.4.1 The report attempts to paint a positive image with Australian live export through reference to the decline in mortality rates of sheep during these live export voyages. We note, however, that the report fails to acknowledge that the reasons for this decline in deaths are due to the very prohibitions and restrictions the industry is seeking to wind back.

- 4.4.2 Animal Liberation concur with RSPCA Australia CEO, Richard Mussell, who maintains that “reducing the northern summer prohibition would be an unacceptable risk to Australian sheep who are vulnerable to heat stress” (RSPCA Australia 2022). Further, Mr. Mussell explains that “the northern summer prohibition – which currently spans from 1 June to 14 September – was never enough to begin with” and therefore concludes that while “live export should be phased out altogether”, the prohibition should, at minimum, be extended from 1 May to 31 October in order to cover the hottest parts of the year (ibid).
- 4.4.3 Mr. Mussell went on to explain that “the community hasn’t forgotten the Awassi Express, where thousands of sheep suffered severe heat stress on board one of these vessels and Australians saw the horror of live sheep export on TV screens”. The Awassi Express disaster triggered widespread community outrage and generated “significant public pressure on the Federal Government” that prompted the northern summer prohibition (RSPCA Australia 2022).



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SOURCES AND REFERENCE MATERIAL

Anonymous. 2003. Sheep onboard a national shame. *The Age*, 24 September.

Australian Broadcasting Commission (ABC). 2011. *A Bloody Business*. Sydney: Australian Broadcasting Commission.

Australian Bureau of Animal Health (ABAH). 1981. *Sea Transport of Sheep*. Canberra: Australian Government Publishing Service.

Australian Government. 2018. *Review of the Australian Standards for the Export of Livestock*. Canberra: Australian Government.

Australian Veterinary Association (AVA). 2018. *The Review of Live Animal Exports Regulatory Capability and Culture: Submission from the Australian Veterinary Association*. Available via www.ava.com.au/contentassets/e27a641f425c4ddc812a25b396ed82f3/ava-submission-to-review-of-live-animal-exports-regulatory-capability-and-culture.pdf.

Balzani, A. and Hanlon, A. 2020. Factors that influence farmers' views on farm: animal welfare - a semi-systematic review and thematic analysis. *Animals*, 10: 1524.

Buddle, E., Bray, H. and Ankeny, R. 2018. 'I feel sorry for them': Australian meat consumers' perceptions about sheep and beef cattle transportation. *Animals*, 8(171).

——— and Bray, H. 2019. How farm animal welfare issues are framed in the Australian media. *Journal of Agricultural and Environmental Ethics*, 32: 357-376.

Burnard, C., Pitchford, W., Edwards, J. and Hazel, S. 2015. Facilities, breed and experience affect ease of sheep handling: the live-stock transporter's perspective. *Animals*, 9: 1379-1385.

Caulfield, M., Cambridge, H., Foster, S. and McGreevy, P. 2014. Heat stress: A major contributor to poor animal welfare associated with long-haul live export voyages. *The Veterinary Journal*, 199(2): 223-228.

Chaudhri, R. 2014. Animal welfare and the WTO: the legality and implications of live export restrictions under international trade law. *Federal Law Review*, 42(2): 279-307.

Colditz, I., Ferguson, D., Collins, T., Matthews, L. and Hemsworth, P. 2014. A prototype tool to enable farmers to measure and improve the welfare performance of the farm animal enterprise: the unified field index. *Animals*, 4: 446-462.

Coleman, G. 2018. Public animal welfare discussions and outlooks in Australia. *Animal Frontiers*, 8(1): 14-19.

Daigle, C. and Ridge, E. 2018. Investing in stockpeople is an investment in animal welfare and agricultural sustainability. *Animal Frontiers*, 8: 53-59.

Department of Agriculture, Fisheries and Forestry (DAFF). 2011a. *Australian Standards for the Export of Livestock and Australian Position Statement on Export of Livestock, Version 2,3*. Canberra: Australian Government.

———. 2011b. *Exporter Supply Chain Assurance System (ESCAS)*. Canberra: Australian Government.

Department of Agriculture, Water and the Environment (DAWE). 2019. *Final Report by the Heat Stress Risk Assessment Technical Reference Panel*. Canberra: Department of Agriculture, Water and the Environment.

———. 2020. *Exporter Supply Chain Assurance System (ESCAS)*. Available via www.awe.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/information-exporters-industry/escas.

SOURCES AND REFERENCE MATERIAL

———. 2021a. History of the trade and reviews. Available via www.awe.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/history.

———. 2021b. All livestock exports. Available via www.awe.gov.au/biosecurity-trade/export/controlled-goods/live-animals/live-animal-export-statistics/livestock-exports-by-market.

———. 2021c. Review of Live Sheep Exports By Sea To, or Through, the Middle East During the Northern Hemisphere Summer: Draft Report. Canberra: Department of Agriculture, Water and the Environment.

Department of Primary Industry (DPI). 1982. Report of the Australian Sheep Meat Study Mission to the Middle East, March-April 1982. Canberra: Commonwealth of Australia.

Department of Foreign Affairs and Trade (DFAT). 2020. Composition of Trade, Australia: 2018-19. Available via www.dfat.gov.au/sites/default/files/cot-2018-19.pdf.

Department of Primary Industries and Regional Development (DPIRD). 2020. Sheep live export. Available via www.agric.wa.gov.au/sheep/sheep-live-export?page=0%2C1.

Descovich, K., Li, X., Sinclair, M., Wang, Y. and Phillips, C. 2019. The effect of animal welfare training on the knowledge and attitudes of abattoir stakeholders in China. *Animals*, 9: 989.

Doyle, R., Coleman, G., McGill, D., Reed, M., Ramdani, W. and Hemsworth, P. 2016. Investigating the welfare, management and human-animal interactions of cattle in four Indonesian abattoirs. *Animal Welfare*, 25: 191-197.

Farmer, B. 2011. Independent Review of Australia's Livestock Export Trade. Canberra: Department of Agriculture, Fisheries and Forestry.

Fickling, D. 2003. Australian protest fails to halt export of live sheep. *The Guardian*, 26 September.

Fisher, A., Colditz, I., Lee, C. and Ferguson, D. 2009. The influence of land transport on animal welfare in extensive farming systems. *Journal of Veterinary Behaviour*, 4(4): 157-162.

Fleming, P., Wickham, S., Barnes, A., Miller, D. and Collins, T. 2020a. Review of livestock welfare indicators relevant for the Australian live export industry. *Animals*, 10(7): 1236.

———, Wickham, S., Dunston-Clarke, E., Willis, R., Barnes, A., Miller, D. and Collins, T. 2020b. Varying opinions about animal welfare in the Australian live export industry: a survey. *Animals*, 10: 1864.

Futureye. 2018. Australia's Shifting Mindset on Farm Animal Welfare. Windsor: Futureye Pty. Ltd.

Hampton, J., Jones, B. and McGreevy, P. 2020. Social licence and animal welfare: developments from the past decade in Australia. *Animals*, 10: 2237.

Hanna, D., Sneddon, I. and Beattie, V. 2009. The relationship between stockperson's personality and attitudes and the productivity of dairy cows. *Animals*, 3: 737-743.

Hastreiter, M. 2013. Animal welfare standards and Australia's live exports industry to Indonesia: creating an opportunity out of a crisis. *Washington University Global Studies Law Review*, 12: 181-203.

Hayes, J., Varischetti, B. and Sullivan, K. 2021. Nation's largest live exporter has licence reinstated after three-year ban. ABC News, 29 November.

SOURCES AND REFERENCE MATERIAL

Hemsworth, P. and Coleman, G. 2011. *Human-Livestock Interactions: The Stockperson and the Productivity and Welfare of Intensively Farmed Animals*. 2nd edition. Wallingford: CABI Publishing.

Hurst, D. 2014. Death at sea of 4,200 Australian sheep prompts new call for live exports ban. *The Guardian*, 17 January.

Iggulden, T. 2018. Moss live exports review finds culture of fear in Ag Dept. *ABC News*, 31 October.

Inspector-General of Live Animal Exports (IGLAE). 2020. Inspector-General of Live Animal Exports report on the department's implementation of Moss Review recommendations. Available via www.iglae.gov.au/media-releases/iglae-report-implementation-moss-review-recommendations.

Jackson, E. and Adamson, D. 2018. The live sheep export supply chain: when operational and societal complexities collide. *International Journal of Business and Systems Research*, 12(2): 181-196.

Jasper, C. and Sullivan, K. 2018. Live export review finds regulations failed, calls for strengthened oversight. *ABC News*, 31 October.

Keniry, J. 2003. *Livestock Export Review: Final Report*. Canberra: Department of Agriculture, Fisheries and Forestry.

Knaus, C. 2021. Australian observers likely to board just one live export ship in two years. *The Guardian*, 31 May.

Laschon, E. and Menagh, J. 2020. More than 50,000 live export sheep set to sail on coronavirus ship to remain in Australia. *ABC News*, 2 June.

LiveCorp. 2019. *Annual Report 2018/19*. Sydney: LiveCorp.

— — — and Meat and Livestock Australia (MLA). 2022. *Veterinary Handbook*. Available via www.veterinaryhandbook.com.au/ContentSection.aspx?id=13.

Llonch, P., King, E., Clarke, K., Downes, J. and Green, L. 2015. A systematic review of animal-based indicators of sheep welfare on farm, at market and during transport, and qualitative appraisal of their validity and feasibility for use in UK abattoirs. *The Veterinary Journal*, 206(3): 289-297.

Logan, T. 2017. Documents reveal how thousands of sheep died on live export vessel. *ABC News*, 9 August.

McCarthy, M. 2012. *Investigating Incidence of Scabby Mouth During Live Export*. North Sydney: Meat and Livestock Australia.

— — —. 2018. *Independent Review of Conditions for the Export of Sheep to the Middle East During the Northern Hemisphere Summer*. Available via www.awe.gov.au/sites/default/files/sitecollectiondocuments/biosecurity/export/live-animals/mccarthy-report.pdf.

Meat and Livestock Australia (MLA). 2019. *Sheep export market evolving*. Available via www.mla.com.au/prices-markets/market-news/2019/sheep-export-market-evolving.

Mellor, D., Beausoleil, N., Littlewood, K., McLean, A., McGreevy, P., Jones, B. and Wilkins, C. 2020. The 2020 Five Domains model: including human-animal interactions in assessments of animal welfare. *Animals*, 10: 1870.

Munro, L. 2015. The live animal export controversy in Australia: a moral crusade made for mass media. *Social Movement Studies*, 14(2): 214-229.

Moffat, K. 2020. *Live Exports and the Australian Community: A National Survey*. Bowen Hills: Voconiq.

SOURCES AND REFERENCE MATERIAL

Moss, P. 2018. Review of the Regulatory Capability and Culture of the Department of Agriculture and Water Resources in the Regulation of Live Animal Exports. Canberra: Department of Agriculture, Water and the Environment.

Munoz, C., Coleman, G., Hemsworth, P., Campbell, A. and Doyle, R. 2019. Positive attitudes, positive outcomes: the relationship between farmer attitudes, management behaviour and sheep welfare. *PLoS ONE*, 14: e0220455.

Norris, R. and Norman, G. 2012. National Livestock Export Industry Shipboard Performance Report 2011. North Sydney: Meat and Livestock Australia.

Osborne, H. and van der Zee, B. 2020. Live export: animals at risk in giant global industry. *The Guardian*, 20 January.

Pendergrast, N. 2015. Live animal export, humane slaughter and media hegemony. *Animal Studies Journal*, 4(1): 99-125.

Petrie, C. 2019. Live Export - A Chronology. Canberra: Department of Parliamentary Services.

Phillips, C. and Santurtun, E. 2013. The welfare of livestock transported by ship. *The Veterinary Journal*, 196(3): 309-314.

———. 2020. Sheep farmers urged to heed live export heat stress research. *Sheep Central*. 6 May.

Pines, M., Petherick, C., Gaughan, J. and Phillips, C. 2004. Developing Alternative Methods of Measuring Animal Welfare on Ships, Stage One: Survey of Industry Opinion. North Sydney: Meat and Livestock Australia.

Richards, R., Norris, R., Dunlop, R. and McQuade, N. 1989. Causes of death in sheep exported live by sea. *Australian Veterinary Journal*, 66(2): 33-38.

Rousing, T., Bonde, M. and Sorensen, J. 2001. Aggregating welfare indicators into an operational welfare assessment system: A bottom-up approach. *Acta Agriculturae Scandinavica, Section A: Animal Science*, 30: 53-57.

RSPCA Australia. 2018a. Media release: Moss Review won't be enough to fix live sheep exports. Available via www.rspca.org.au/media-centre/news/2018/moss-review-won%E2%80%99t-be-enough-fix-live-sheep-exports-rspca.

———. 2018b. Media release: RETWA approval may be final nail in the coffin for live sheep exports. Available via www.rspca.org.au/media-centre/news/2018/retwa-approval-may-be-final-nail-coffin-live-sheep-exports-rspca.

———. 2022. Media release: Live sheep export prohibition reduction an unacceptable risk. Available via www.rspca.org.au/media-centre/news/2022/live-sheep-export-prohibition-reduction-unacceptable-risk.

Schipp, M. and Sheridan, A. 2013. Applying the OIE Terrestrial Animal Health Code to the welfare of animals exported from Australia. *Revue scientifique et technique*, 32(3): 669-683.

Select Committee on Animal Welfare (SCAW). 1985. Export of Live Sheep from Australia. Canberra: Parliament of the Commonwealth of Australia.

Sinclair, M., Zito, S., Idrus, Z., Yan, W., van Nhiem, D., Lampang, P. and Phillips, C. 2017. Attitudes of stakeholders to animal welfare during slaughter and transport in SE and E Asia. *Animal Welfare*, 26: 417-425.

———, Derkley, T., Fryer, C. and Phillips, C. 2018. Australian public opinions regarding the live export trade before and after an animal welfare media exposé. *Animals*, 8: 106.

——— and Phillips, C. 2019. Asian livestock industry leaders' perceptions of the importance of, and solutions for, animal welfare issues. *Animals*, 9: 319.

SOURCES AND REFERENCE MATERIAL

Thompson, B. 2021. Breakthrough ends 10-year halt on sheep exports to Saudi Arabia. Australian Financial Review, 7 April.

Wahlquist, C. 2019. Live exporter charged with animal cruelty over deadly Awassi shipment. The Guardian, 31 July.

Willis, R., Dunston-Clarke, E., Keating, L., Fleming, P. and Collins, T. 2021. Australian livestock export industry workers' attitudes toward animal welfare. *Animals*, 11(5): 1411.

World Organisation for Animal Health (OIE). 2000. Final Report of the 69th OIE General Session. Paris: World Organisation for Animal Health.

Wroe, D. 2012. Thousands of sheep stuck on ship in persian Gulf. The Sydney Morning Herald, 4 September.



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