

**Submission**

**Review of live sheep exports by sea to, or through, the Middle East during the Northern Hemisphere summer**

*January 2022*





## Animal Justice Party

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Live sheep export. Animals Australia/Getty Images

*The Animal Justice Party acknowledges the Aboriginal and Torres Strait Islander peoples,  
the traditional owners of this land with deep respect.*

## About the Animal Justice Party

The Animal Justice Party (the AJP) is a political party established in 2009 to secure the interests of animals and nature through Australia's democratic institutions of government. Our vision is a planet on which animals and nature have the right to live and thrive free from negative human interference and a human society which functions with kindness and compassion within its ecological limits as a responsible member of the Earth community. The AJP seeks to foster respect, kindness, and compassion towards all species particularly in the way governments design and deliver initiatives, and the manner in which these initiatives function.

In New South Wales the AJP has two elected representatives in the Legislative Council of NSW, Mark Pearson MLC and Emma Hurst MLC and a councillor in local government, Councillor Matt Stellino. In Victoria, the AJP has an elected representative in the Legislative Council, Andy Meddick MLC, and a councillor in Local Government, Councillor Julie Sloan.

This submission was prepared by the National Submissions Working Group within the AJP. The working group makes this submission on behalf of the AJP with the approval and the endorsement of the Board of Directors.

## Introduction

The purpose of this Review is to consider *“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 review also *“considers the efficacy of the current regulatory settings in ensuring the sustainability of the live sheep export industry.”*

The Animal Justice Party will be considering the following:

- The effectiveness of the current regulatory settings applying to sheep exports by sea during the Northern Hemisphere summer in reducing the occurrence of heat stress and heat-related mortalities
- Whether the current regulatory settings for sheep exports during the Northern Hemisphere summer are maintaining acceptable animal welfare outcomes, and supporting the sustainability of the live sheep export industry
- Evidence-based options to maintain or modify the current regulatory settings

We will also take into account:

- The effect of climate change on the sustainability of live sheep export
- A broader range of animal welfare considerations on export ships
- The attitudes of ordinary Australians toward live export
- The human cost of live sheep export, and
- The economic viability of the sector compared with alternatives.

This submission is guided by our mission and vision and underpinned by our policies. The AJP has policies on animals, environment and human issues<sup>1</sup>, in particular our Live Animal Export policy.<sup>2</sup> Animal Law policy<sup>3</sup>, and Farming policy<sup>4</sup> are pertinent to this submission.

In this submission we will present our arguments for following the lead of New Zealand and phasing out live exports with no exceptions. Our submission is structured around themes that substantiate our arguments; recommendations are provided at the end of our submission.

Thank you for the opportunity to contribute to this consultation.

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<sup>1</sup> Animal Justice Party *Policies* <https://animaljusticeparty.org/policies/>

<sup>2</sup> [LIVE ANIMAL EXPORTS](#)

<sup>3</sup> <https://animaljusticeparty.org/wp-content/uploads/2020/10/AnimalLaw2020.pdf>

<sup>4</sup> <https://animaljusticeparty.org/wp-content/uploads/2017/11/farmingA4.pdf>

## 1. The New Zealand experience

New Zealand is among the leading countries in the world with respect to animal welfare. Humane treatment of animals has a long tradition in New Zealand culture, and the public has high expectations about how animals are treated within its agricultural sector.

New Zealand is actually one of the only four countries in the world ranked with “A” by the Animal Protection Index 2014, and the only one outside Europe<sup>5</sup> and the Government is proud of its reputation as a responsible exporter.

Since 2007, the Government of New Zealand has been reviewing the national policy for exports of livestock for slaughter. The practise was banned by the Clark Labour Government in 2008, but a legal loophole still allowed hundreds of thousands of dairy cattle to be exported. After the Live Export ship, Gulf Livestock 1 sank with thousands of dairy cattle on board, the New Zealand Government responded by beginning a process of consultation with their Independent National Animal Welfare Advisory Committee, and has since announced that from 2023 the export of all live animals (including for dairy and breeding) will cease.

There are two things we can learn from the New Zealand experience.

Firstly, **it is an example of a government that takes its social licence seriously**, prioritising advice handed down by animal welfare agencies, rather than those involved in the trade for profit. This is in recognition of the fact that animal welfare on live export ships is an issue the public feel strongly about.

Secondly, **this is an example of a government that understands a minor hit to its GDP is a small price to pay in return for a longer-term investment in its reputation** as a country with very high welfare practises, with Agriculture Minister Damien O’Conner stating *"We must stay ahead of the curve in a world where animal welfare is under increasing scrutiny."*<sup>6</sup>

In Australia, while there is concern over public sentiment and reputation, the Government seems to treat this as an obstacle to profit, rather than an indication that the industry lacks social licence.

According to a study carried out by Futureye<sup>7</sup>, **an overwhelming majority (95%) of the public is concerned about the treatment of farm animals and considers farm animal welfare in Australia to be an issue to some degree.** They found **the issue that is of most concern to this vast**

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<sup>5</sup> [http://api.worldanimalprotection.org/sites/default/files/api\\_new\\_zealand\\_report\\_0.pdf](http://api.worldanimalprotection.org/sites/default/files/api_new_zealand_report_0.pdf).

<sup>6</sup>

<https://www.sbs.com.au/news/new-zealand-is-set-to-ban-live-exports-by-sea-as-animal-welfare-comes-under-increasing-scrutiny/fd595af5-615b-412c-9cb5-3312a971d953>

<sup>7</sup> <https://www.outbreak.gov.au/sites/default/files/documents/farm-animal-welfare.pdf> p.10

**majority of Australians is that of live export.** The report states, “When analysing the drivers of concern of farming in Australia in general, quantitative research results indicate that poor animal welfare standards of animals on export ships and poor animal welfare for Australian animals abroad rank as the highest drivers”. (p11).

It is apparent that the industry’s lack of social licence due to shifting community attitudes on the welfare of farmed animals could pose a significant risk to sustainability.

We believe that this review, with its heavy focus on the climatic conditions in various parts of the Middle East during the northern hemisphere summer, is failing to address the role that social licence and public opinion plays in determining the long-term sustainability of the trade. The New Zealand Government has taken a more responsible route in taking public opinion on animal welfare into account and banning a practice the vast majority of the population finds cruel and unnecessary.

## **2. The effect of climate change on the sustainability of live sheep export**

This report focuses on climatic conditions during the northern hemisphere summer, with a view to identifying prohibition dates to improve the standard of animal welfare on board the vessels bound for the Middle East.

We also believe there is a strong relationship between climate conditions and animal welfare onboard vessels bound for the Middle East, however, restricting the discussion to specific dates does little to address the greater sustainability issues around climate.

It is impossible to consider the future of the live export trade from Australia to the Middle East at any time of year without considering the impact of climate change. The Middle East is warming at twice the global average and by 2050 will be **4 degrees Celsius warmer** compared with the 1.5 degree mark that scientists have prescribed to save humanity. The World Bank says extreme climatic conditions will become routine and the region could face four months of scorching sun every year. According to Germany’s Max Planck Institute, many cities in the Middle East may literally become uninhabitable before the end of the century<sup>8</sup>.

During 2021, a number of countries recorded extreme temperatures. Kuwait reported a temperature of 53.2 degrees celsius. Iraq and Iran both recorded temperatures of 51 degrees, while Oman, the United Arab Emirates, and Saudi Arabia all recorded over 50 degrees<sup>9</sup>. These rises in temperature, which will most likely be exacerbated by lack of rainfall, depletion of soil

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<sup>8</sup> <https://foreignpolicy.com/2021/08/24/the-middle-east-is-becoming-literally-uninhabitable/>

<sup>9</sup> <https://foreignpolicy.com/2021/08/24/the-middle-east-is-becoming-literally-uninhabitable/>

moisture and limited evaporative cooling, are set to continue into the future, particularly if greenhouse gas emissions continue at the current rate.

*“If nothing changes, cities may experience temperatures of 60 degrees Celsius in the future<sup>10</sup>”.*

Of course, these temperatures were recorded during the hottest part of the year, when the proposed prohibition will most likely take place. However, temperature rises are also predicted for other months as well.

For example, Figure 1 shows the average current temperatures in Dubai in the United Arab Emirates over the whole year. It is clear from this graph that there are only three months where the average temperatures will fall below the 29 degree limit, identified as the ‘danger zone’ temperature for sheep.

Figure 2 shows the average current temperatures in Mecca, Saudi Arabia, where temperatures are either dangerously close to or over 29 degrees for seven months of the year.

Figure 3 shows the average current temperatures for Kuwait, identified as the country with the most favourable weather conditions for live export. Even in Kuwait, it appears there are six months of the year that should be off-limits.

The temperatures in this table do not factor in climate change, which is predicted to cause an increase in the region’s temperatures by about **four degrees over the coming years**, affecting the future sustainability of the industry.

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<sup>10</sup> <https://foreignpolicy.com/2021/08/24/the-middle-east-is-becoming-literally-uninhabitable/>

### Dubai average temperatures - United Arab Emirates

Month	Min (°C)	Max (°C)	Mean (°C)	Min (°F)	Max (°F)	Mean (°F)
January	15	24	19.7	59	76	67.5
February	17	26	21.5	62	80	70.8
March	19	29	24.1	66	85	75.4
April	22	34	28.3	72	94	82.9
May	26	39	32.4	79	101	90.2
June	29	40	34.4	84	104	93.9
July	31	41	36.2	88	106	97.1
August	31	42	36.6	88	107	97.9
September	29	39	34	84	102	93.2
October	25	36	30.6	78	97	87.2
November	21	31	26	70	87	78.8
December	17	26	21.8	63	79	71.2
Year	23.6	34.1	28.8	74.5	93.3	84

Figure 1. Average temperatures in Dubai before the projected 4 degree increase by 2050<sup>11</sup>.

<sup>11</sup> <https://www.climatestotravel.com/climate/united-arab-emirates>

## Mecca Average Temperatures - Saudi Arabia

	January	February	March	April	May	June	July	August	September	October	November	December
Avg. Temperature °C (°F)	21.3 °C (70.4) °F	23.3 °C (74) °F	25.6 °C (78.1) °F	28.9 °C (84) °F	32.2 °C (89.9) °F	33.6 °C (92.4) °F	33.6 °C (92.5) °F	33.3 °C (92) °F	32.5 °C (90.5) °F	29.6 °C (85.2) °F	25.8 °C (78.4) °F	23 °C (73.4) °F
Min. Temperature °C (°F)	15.8 °C (60.4) °F	17.3 °C (63.1) °F	19 °C (66.1) °F	22.2 °C (71.9) °F	24.8 °C (76.7) °F	26 °C (78.8) °F	26.8 °C (80.2) °F	26.9 °C (80.5) °F	26 °C (78.9) °F	23.4 °C (74.1) °F	20.1 °C (68.2) °F	17.3 °C (63.2) °F
Max. Temperature °C (°F)	27 °C (80.6) °F	29.8 °C (85.7) °F	32.5 °C (90.5) °F	35.7 °C (96.3) °F	39.2 °C (102.6) °F	40.8 °C (105.4) °F	40 °C (104.1) °F	39.5 °C (103.1) °F	39 °C (102.3) °F	36.2 °C (97.1) °F	31.6 °C (88.9) °F	28.6 °C (83.4) °F
Precipitation / Rainfall mm (in)	43 (1.7)	4 (0.2)	10 (0.4)	12 (0.5)	6 (0.2)	0 (0)	0 (0)	1 (0)	3 (0.1)	6 (0.2)	20 (0.8)	25 (1)
Humidity(%)	54%	47%	39%	34%	27%	24%	27%	36%	39%	44%	51%	54%
Rainy days (d)	3	1	1	2	2	0	0	1	1	2	2	2
avg. Sun hours (hours)	8.3	9.5	10.4	11.3	11.8	12.1	12.0	11.5	11.0	10.5	9.7	8.8

Figure 2. Average temperatures in Mecca before the projected 4 degree increase by 2050<sup>12</sup>.

## Kuwait Average Temperatures

	January	February	March	April	May	June	July	August	September	October	November	December
Avg. Temperature °C (°F)	13.5 °C (56.3) °F	15.6 °C (60.1) °F	20.3 °C (68.5) °F	25.6 °C (78.1) °F	31.8 °C (89.3) °F	36.2 °C (97.2) °F	37.6 °C (99.7) °F	37.4 °C (99.3) °F	34.1 °C (93.4) °F	28.9 °C (84) °F	20.8 °C (69.4) °F	15.3 °C (59.5) °F
Min. Temperature °C (°F)	9.5 °C (49) °F	11 °C (51.9) °F	15 °C (59.1) °F	20.3 °C (68.5) °F	25.9 °C (78.7) °F	30.1 °C (86.1) °F	31.6 °C (89) °F	31.5 °C (88.6) °F	28.2 °C (82.7) °F	23.5 °C (74.3) °F	16.6 °C (61.9) °F	11.3 °C (52.4) °F
Max. Temperature °C (°F)	17.7 °C (63.8) °F	20.3 °C (68.5) °F	25.5 °C (77.9) °F	30.7 °C (87.2) °F	37.2 °C (98.9) °F	42.1 °C (107.8) °F	43.3 °C (110) °F	43.1 °C (109.7) °F	40.1 °C (104.2) °F	34.5 °C (94.1) °F	25.1 °C (77.3) °F	19.4 °C (67) °F
Precipitation / Rainfall mm (in)	31 (1.2)	14 (0.6)	17 (0.7)	7 (0.3)	2 (0.1)	0 (0)	0 (0)	0 (0)	0 (0)	2 (0.1)	30 (1.2)	25 (1)
Humidity(%)	64%	55%	42%	38%	29%	20%	22%	27%	29%	40%	51%	62%
Rainy days (d)	3	2	2	1	0	0	0	0	0	0	2	3
avg. Sun hours (hours)	8.9	9.8	10.7	11.5	12.2	12.6	12.4	11.9	11.1	10.3	9.3	8.8

Figure 3. Average temperatures in Kuwait before the projected 4 degree increase by 2050<sup>13</sup>.

<sup>12</sup> <https://en.climate-data.org/asia/saudi-arabia/makkah-region/mecca-3533/#climate-graph>

<sup>13</sup> <https://en.climate-data.org/asia/kuwait/kuwait-city/kuwait-city-4807/>

### 3. Animal welfare considerations in relation to the sustainability of the live export of sheep to the Middle East

The Animal Justice Party is aware that this consultation is focussing heavily on heat stress as the primary animal welfare issue, as the report itself states, *“the primary objectives of government action were to improve animal welfare outcomes by reducing the risk of heat stress in sheep exported to, or through, the Middle East during the Northern Hemisphere summer”*. However, the Department’s report also makes clear that any improved animal welfare outcomes are in the service of maintaining *“a viable live sheep export trade”, as well as to “uphold Australia’s reputation as an exporter of high-quality livestock”*.

The Animal Justice Party is adamant that animal welfare should be of primary importance, not to assist the trade improve its profitability, but because we have a **moral and ethical responsibility to provide animals in our care with good welfare outcomes.**

However, evidence gathered from veterinarians and independent observers on board live export vessels point to a range of serious welfare issues that need consideration if the industry is serious about meeting the expectations of the public and providing stronger animal welfare outcomes.

In 1985, the Senate Select Committee on Animal Welfare in its report *‘The Export of Live Sheep from Australia’* concluded that if a decision on the future of the trade were made on animal welfare grounds alone, there was enough evidence to stop the trade.<sup>14</sup>

It appears that since 1985, not much has changed.

Until recently, independent observers were a standard feature of live export voyages to the Middle East, and they have provided substantial evidence of welfare failures aboard these vessels. The respected veterinary journal, *‘Animals’*<sup>15</sup> compiled the findings of thirty seven reports by observers on board live export vessels, and concluded that inhumane conditions may be the norm, not the exception on live export voyages.

Thirty out of thirty seven of the independent observer summaries documented *“poor pen conditions or insufficient space,”* according to co-author Dr. Di Evans, and *“all thirty seven of them identified health issues such as painful eye disease, pneumonia or lameness.”*

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<sup>14</sup>[https://www.aph.gov.au/About\\_Parliament/Parliamentary\\_Departments/Parliamentary\\_Library/pubs/BriefingBook44p/AnimalExports](https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/BriefingBook44p/AnimalExports)

<sup>15</sup> <https://www.mdpi.com/2076-2615/11/10/2862>

In addition, over forty percent of the voyages struggled to provide adequate water to the livestock. This is of particular concern for transits through the tropics, where heat stress adds to the challenging conditions aboard a live-export ship.

***“Nearly a third of voyages had both food and water issues, which is completely unacceptable. These are inhumane conditions to be knowingly putting animals through and unless we see significant change, and ultimately an end to live export altogether, hundreds of thousands more Australian animals are going to suffer.”***

Given the high average age of the livestock carrier fleet, it is perhaps unsurprising that nearly two-thirds of the observers also reported problems with the ship's equipment, including poorly-maintained fittings, failing water-supply systems and engine breakdowns.

***“What this study makes clear is that this isn’t just one or two bad operators - these animal welfare risks are inherent in the live export trade. For example, a staggering 38 percent of voyages had food shortages or limited access to food, including more than one in 10 voyages having to ration food or exhausting the supply,”<sup>16</sup>***

Dr Lynn Simpson is a veterinarian who served as the on-board vet for some fifty seven live export voyages. She has given harrowing and vivid descriptions of debilitating injuries, including heat stress, mother sheep suffering abortions or still births due to stress, lambs being crushed to death in the cramped conditions on deck, and having to routinely kill sheep and lambs to put them out of their misery. On another voyage, she conducted post-mortems on 120 dead and dying sheep, who had been roughly piled together on deck. She described live export ships as “a floating coffin.” *“Sheep die on every ship that leaves Australia.”<sup>17</sup>*

In her 2019 submission to the Inquiry, ‘Live Sheep Exports to the Middle East - Have Your Say’, she stated,

***‘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 defensible. 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.’<sup>18</sup>***

We agree strongly with this sentiment.

<sup>16</sup> <https://www.maritime-executive.com/article/study-observers-find-poor-conditions-on-most-live-export-ships>

<sup>17</sup> <https://animalsaustralia.org/latest-news/lynn-simpson-a-life-live-export-stories/#:~:text=Floating%20coffin%20may%20more%20accurately,prime%20of%20their%20young%20lives.>

<sup>18</sup> <https://www.awe.gov.au/sites/default/files/documents/ris-discussion-paper-dr-simpson-lynn.pdf>

Besides instances of cruelty onboard ships, there's the appalling conditions the animals have to endure in countries where animal welfare standards fall way below ours, many of which are in the Middle East region. While we are aware that the Department of Agriculture has started to monitor processing facilities more carefully in the region, these are countries with some of the lowest animal welfare records in the world.

Countries like Iran<sup>19</sup>, Jordan<sup>20</sup> and Kuwait<sup>21</sup> either have very weak laws or the laws they do have are not enforced, and these Middle Eastern nations have been the subject of widespread condemnation from outside of Australia as well. Eurogroup for Animals has reported abuses in countries Australia frequently trades with like Lebanon<sup>22</sup>.

Given the widespread prevalence of disregard for animal welfare in these countries, and the fact that exporters are rarely punished when breaches of Australian standards occur<sup>23</sup>, we fail to see how the industry can ensure acceptable animal welfare standards are upheld.

It is our view that there is an inherent conflict of interest for the Department in seeking to redefine the parameters of the live export sheep trade due to serious ongoing animal welfare concerns, while also overtly supporting its continuation and viability.

#### **4. The attitude of Australians towards live export**

The issue of live export has always been a contentious one in Australia, and there is overwhelming evidence that the Australian public are opposed to the trade.

Animal welfare organisations like Animals Australia and Stop Live Exports have been very effective in informing ordinary Australians of the realities of live export ships, and the issue is regularly covered in mainstream news.

A poll carried out by the RSPCA has revealed that around three out of four Australians would like to see an end to live export, and more than nine out of ten want to see long-haul live export standards improved so all animals can lie down and access food and water easily.<sup>24</sup>

This concern over standards and opposition to live export is consistent across rural and country areas, including Australia's traditional farming communities. An RSPCA poll also found almost

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<sup>19</sup> <https://api.worldanimalprotection.org/country/iran>

<sup>20</sup> <https://www.abc.net.au/news/rural/https://api.worldanimalprotection.org/country/iran2021-07-29/live-exports-suspended-over-welfare-concerns-in-jordan/100334146?nw=0>

<sup>21</sup> <https://248am.com/fajer/animals/kuwait-law-animal-rights/>

<sup>22</sup> <https://www.eurogroupforanimals.org/news/how-much-enough-new-evidence-shows-suffering-animals-exported-spain-middle-east-s-laughter>

<sup>23</sup> <https://www.theguardian.com/world/2018/apr/13/weak-rules-fail-to-stop-inhumane-slaughter-of-australian-animals-overseas>

<sup>24</sup> <https://www.rspca.org.au/media-centre/news/2018/new-poll-finds-3-4-australians-want-live-export-end-greatest-concern-over>

seven out of ten Australians in rural/country areas and towns also want to end live exports, and that ninety five percent of people in rural and country towns are concerned over the inadequacy of current standards, more than people elsewhere in the country.<sup>25</sup> This data contradicts the often-touted claim that opposition to live exports is centred in city areas and among people with no direct experience of farming.

The poll also found that nationally, more than 75 percent of Australians agreed with the government providing financial support to farmers to stop live exporting animals.

Opposition to live exports was strongest in South Australia (80%), and also strong in Western Australia (almost 70%), areas where the most live exported sheep are sourced.<sup>26</sup>

It seems incongruous that possibly hundreds of thousands of letters to Members of Parliament have fallen on deaf ears especially in the Liberal and National parties. The Labour Party, Animal Justice Party and The Greens seem to be doing a better job of listening to their constituents, as they have all pledged to phase out the trade.

## **5. Effectiveness of the current regulatory settings for sheep exports during the Northern Hemisphere summer**

In recent years, the Government has been making claims over how regulations around live exports are improving. Despite these claims, we have seen many examples of poor regulation, including several instances where the Government has completely disregarded its own previous decisions.

In June 2019 the federal Department of Agriculture backflipped on its decision to prevent the export of 50,000 sheep into the searing heat and humidity of Kuwait during the prohibited period of the Northern Hemisphere summer. The Department announced they had granted an exemption to allow the COVID-19-affected Al Kuwait to commence loading for a departure to Kuwait on Wednesday, 17 June<sup>27</sup>.

Senior policy advisor for the RSPCA, Jed Goodfellow said<sup>28</sup>:

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<sup>25</sup> <https://www.rspca.org.au/media-centre/news/2018/new-poll-finds-3-4-australians-want-live-export-end-greatest-concern-over>

<sup>26</sup> <https://www.rspca.org.au/media-centre/news/2018/new-poll-finds-3-4-australians-want-live-export-end-greatest-concern-over>

<sup>27</sup> <https://www.abc.net.au/news/2020-06-16/sheep-cleared-for-export-al-kuwait-middle-east-as-appeal-fails/12359242>

<sup>28</sup> <https://www.rspca.org.au/media-centre/news/2020/live-export-boiling-point-rspca-disbelief-over-exemption-backflip>

***“This exemption indicates that the government has swung the risk pendulum back in favour of economic interests over animal welfare. “The risks to the health and welfare of the sheep which were key to the previous decision have not diminished – in fact, they increase every day as temperatures in the Middle East rise.” “This decision means sheep will be exposed to an even greater degree of suffering, in return for financial gain for one of Australia’s most notorious live exporters.....The public can have no faith in the Department to drive progress or improvement to this industry, let alone enforce its own regulations, when it is so clearly compromised by external influences.”***

The Department claimed that further reductions to stocking density of 10% would mitigate such risks, but when introducing the new regulations prohibiting exports during the Northern Summer, the Department concluded;

***“If ambient temperatures are very hot, as occurs from June to mid-September (inclusive) in the Middle East, no amount of additional space will allow for metabolic heat loss.”***

The RSPCA also condemned the decision, saying, *“The public can have no faith in the Department to drive progress or improvement to this industry, let alone enforce its own regulations, when it is so clearly compromised by external influences.”*<sup>29</sup>

Another example of the Department of Agriculture showing disregard for its own regulations is the removal of independent observers from live export vessels.

Commencing in April 2018, after media coverage of animal cruelty and declining public trust, the Australian government began deploying Independent Observers (IOs) on some live export ships. The role of an observer was to monitor, observe and report on activities in approved export programs for the purpose of ensuring the health and welfare of live animals in the course of export activities.

Following the completion of the voyage, observers prepared a report detailing their observations from the loading of the vessel, through to completion of discharge at the final destination port. The primary purpose of the independent observer reports was to provide the Department with information to enable the effective regulation of the livestock export trade, including identifying issues that require regulatory action, so they could take corrective measures. A comprehensive quality assurance and peer review process was then applied to each observer report.

Observers were initially required on all live export ships, but the program was watered down in 2019, requiring observers only for higher risk journeys. The last observer to be placed on a ship

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<sup>29</sup> <https://www.rspca.org.au/media-centre/news/2020/live-export-boiling-point-rspca-disbelief-over-exemption-backflip>

was in June 2020, on board the Al Kuwait. Prior to that voyage, the last publicly available observer report was filed from a journey on 21 March<sup>30</sup> and are not expected to return until at least mid-2022. The official reason is that international travel restrictions have made it too difficult and unsafe to deploy observers to ships, as they are considered non-essential workers. However, even before the pandemic travel restrictions were put in place, the requirement to include an independent observer on export ships was wound back to two ships in January 2020, a seven-fold decrease from January 2019, when 14 ships included independent observers.

**It is hard to imagine why the very person responsible for monitoring animal welfare was the very person not permitted to be aboard the vessel.** This suggests that animal welfare is not a priority for the Department.

There is also ample evidence of reluctance from the Department to penalise exporters who break the rules. An analysis carried out by The Guardian<sup>31</sup>, in which 142 Department investigations into non-compliance were examined, revealed 125 findings of non-compliance. Of these 125 incidents of non-compliance with the Exporter Supply Chain Assurance System (ESCAS), there were only three records of penalties administered. This is despite documented evidence of “non-compliant handling, restraint and slaughter practises” like sledgehammers being used, and animals being slaughtered outside of the abattoir. These numbers did not include all cases of non-compliance because if an exporter reported an incident within the “required timeframe” there is no investigation.

Backflipping on previously-agreed regulations, failure to provide independent observers and a reluctance to penalise those who don’t comply with the rules all point to a general disregard on behalf of the Department of Agriculture to take enforcement of animal welfare regulations seriously. Appealing to public sentiment about strengthening welfare standards means nothing if the regulations being introduced aren’t taken seriously or not enforced.

## **6. The human cost of live sheep export**

The Animal Justice Party is also concerned about welfare issues concerning crew members on these ships, and the greater cost to human health that could occur should there be an outbreak of another zoonotic disease as a result of cramming animals together on vessels under stressful conditions.

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<https://www.theguardian.com/australia-news/2021/may/31/australian-observers-likely-to-board-just-one-live-export-ship-in-two-years>

<sup>31</sup> <https://www.theguardian.com/world/2018/apr/13/weak-rules-fail-to-stop-inhumane-slaughter-of-australian-animals-overseas>

Over the years, ample evidence has been gathered regarding the risks to crew members on board live export ships. On deck, they can be exposed to dangerous levels of ammonia, carbon dioxide, and highly flammable methane from the animals themselves and their waste. While these gas build-ups are known to increase dramatically particularly in hot weather live-export ships don't monitor or log toxic-gas levels, even though this is a basic precaution taken on most other vessels, including car carriers. Sometimes there is no medical doctor on board.<sup>32</sup>

Livestock ships also present advantages to those engaged in criminal activities. A specialist in maritime safety and pollution states that livestock ships are *"unrivalled in their usefulness for illegally transporting dubious goods, such as narcotics, weapons, counterfeit goods and wildlife by-products"*.<sup>33</sup> Other benefits, says a live animal transport specialist with the Animal Welfare Foundation, include the difficulty of searching pens filled with live animals and the strong smells. Therefore crew can be exposed to criminal networks, and even people smugglers and suffer added mental and emotional stress.

Crews are not the only ones to experience adverse health conditions as a result of the conditions on live export ships. A recent report from the United Nations<sup>34</sup> warns that intensive animal agriculture was a major contributor to the increasing risk of zoonotic diseases. In November 2021, the county of San Francisco issued a moratorium on the building of new factory farms and slaughterhouses citing a grave risk to human health as one of the reasons<sup>35</sup>.

The live export industry forces animals into close confinement in surroundings that are unnatural to them. This can lead to extreme stress, which in turn can lead to sickness, and this can be passed to humans. World Health Organisation epidemiologist, Professor Mary-Louise McLaws has been outspoken in the danger of live exports as a potential source of another outbreak<sup>36</sup>. During an interview with Lisa Wilkinson on the Project, she predicted that there probably won't be any changes to the industry *"until maybe there's an outbreak of some ghastly disease in animals while they're being shipped to other countries."*

David McIver, a senior scientist and epidemiologist at biotech company Metabiota, said the rise in live animal exports was a growing issue for many other diseases, such as avian influenza virus, mad cow disease and Nipah virus.<sup>37</sup>

Given the economic fallout of the recent Covid 19 epidemic, and the devastating effect it has had on the lives of Australians, it seems almost unbelievable that the Department of Agriculture is

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<sup>32</sup> <https://www.peta.org.au/issues/food/human-rights-live-export-industry/>

<sup>33</sup> <https://www.theguardian.com/environment/2021/aug/18/live-animal-exports-are-being-used-as-cover-by-smugglers-say-ngos>

<sup>34</sup> [https://www.unep.org/news-and-stories/statements/preventing-next-pandemic-zoonotic-diseases-and-how-break-chain?\\_ga=2.245059269.112534664.1642738345-1278853336.1642738345](https://www.unep.org/news-and-stories/statements/preventing-next-pandemic-zoonotic-diseases-and-how-break-chain?_ga=2.245059269.112534664.1642738345-1278853336.1642738345)

<sup>35</sup> <https://www.dailyadvent.com/news/88833761b8b2b352b3e22c5e2a13c5a2-San-Francisco-Passes-Resolution-Against-Animal-Agriculture>

<sup>36</sup> <https://animalsaustralia.org/latest-news/disease-specialist-warns-live-export-must-end/>

<sup>37</sup> <https://metabiota.com/news/page/3#!metabiota-in-the-guardian-live-animals-are-the-296>

willing to risk the livelihood of our citizens, simply to protect the profits of a few key players in the industry.

## **7. The economic viability of the live export industry versus alternatives to live export**

The Australian Government has always held the view that the live export trade is “a good industry for our country” and “a good industry for our farmers”<sup>38</sup>. However, when the economic viability of the industry is scrutinised, there is little evidence that supports this claim. Although the live export industry is worth around \$1.3 - \$1.8 billion annually, it makes up a tiny percentage of Australia's total exports, worth \$373 bn<sup>39</sup> in 2020. If Australia were to end live exports, that \$1.3 - \$1.8 would simply be absorbed into other industries, in particular, the chilled meat export industry and also see more jobs and profits staying in Australia<sup>40</sup>.

An analysis was carried out by an independent researcher to examine the costs and benefits of processing animals domestically instead of exporting them live. This research indicated that farmers and local industry would benefit financially and the increase in domestic processing would help create jobs. Importantly millions of Australian sheep would be protected from the unnecessary suffering of live export.<sup>41</sup>

As can be seen from the table below, the live sheep export trade in Australia has declined from around 7 million sheep exported per year in the late 1980s to about 1 million per year (2020), and the trend is clearly downwards.

According to a recent Meat & Livestock Australia update, in 2020 live sheep exports reached an historic low with a 27% decline on the previous year, “in part reflecting the gradual, long-term decline in the national sheep flock.” In fact, the decline in the value of live sheep exports declined 41% compared to 2019.<sup>42</sup>

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<sup>38</sup> <https://www.sbs.com.au/news/comment-we-need-to-talk-about-live-export-australia>

<sup>39</sup> <https://www.dfat.gov.au/publications/trade-and-investment/trade-and-investment-glance-2020>

<sup>40</sup>

<https://www.rspca.org.au/sites/default/files/website/Campaigns/Live-export/Live-exports-vs-the-meat-trade/ACIL%20Tasman%202009%20-%20The%20value%20of%20live%20sheep%20exports%20from%20Western%20Australia.pdf>

<sup>41</sup> <https://www.worldanimalprotection.org.au/our-work/animals-in-farming/live-export/alternatives-to-live-export>

<sup>42</sup>

<https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/trends--analysis/sheep-projections/mla-sheep-industry-projections-2021-feb.pdf>

### Live Sheep Exports as a proportion of Total Slaughtered Sheep (1980-2020), Value \$m

Year	Domestic Slaughter			Live Sheep <sup>1</sup>	Total Value	Export Value % of Total
	Sheep	Lamb	Total			
1980	208.67	339.23	547.90	171.00	718.90	23.8
1981	141.14	330.56	471.70	175.00	646.70	27.1
1982	93.88	278.12	372.00	176.00	548.00	32.1
1983	69.30	274.80	344.10	218.00	562.10	38.8
1984	71.05	245.95	317.00	201.00	518.00	38.8
1985	77.38	285.22	362.60	169.00	531.60	31.8
1986	121.06	403.14	524.20	197.00	721.20	27.3
1987	168.29	414.61	582.90	221.00	803.90	27.5
1988	150.18	392.12	542.30	198.69	740.99	26.8
1989	89.82	393.46	483.28	105.49	588.77	17.9
1990	29.30	298.39	327.69	49.54	377.23	13.1
1991	71.44	308.68	380.12	90.96	471.08	19.3
1992	120.17	438.70	558.87	122.73	681.59	18.0
1993	154.45	493.73	648.17	151.07	799.24	18.9
1994	179.06	473.45	652.51	185.24	837.75	22.1
1995	222.64	586.15	808.79	227.44	1036.23	21.9
1996	215.84	636.82	852.66	193.09	1045.75	18.5
1997	298.50	574.43	872.93	200.16	1073.09	18.7
1998	226.63	645.20	871.83	188.11	1059.94	17.7
1999	204.57	668.58	873.16	185.50	1058.65	17.5
2000	367.65	776.50	1144.14	264.48	1408.62	18.8
2001	544.46	1181.43	1725.89	398.88	2124.77	18.8
2002	467.74	1160.93	1628.66	415.29	2043.95	20.3
2003	454.25	1318.10	1772.34	268.43	2040.78	13.2
2004	417.78	1327.00	1744.78	210.19	1954.98	10.8
2005	443.64	1377.61	1821.25	297.19	2118.43	14.0
2006	380.03	1387.17	1767.20	289.59	2056.80	14.1
2007	400.09	1481.37	1881.46	287.19	2168.65	13.2
2008	427.77	1725.33	2153.09	340.08	2493.17	13.6
2009	498.50	1831.77	2330.27	297.76	2628.03	11.3
2010	484.49	2029.42	2513.91	348.07	2861.97	12.2
2011	419.39	2135.64	2555.03	344.97	2900.00	11.9
2012	328.79	1696.08	2024.87	194.00	2218.87	8.7
2013	513.04	1943.23	2456.27	184.69	2640.96	7.0
2014	650.23	2401.34	3051.57	244.80	3296.37	7.4
2015	535.18	2476.75	3011.94	227.51	3239.45	7.0
2016	614.75	2717.27	3332.01	232.99	3565.00	6.5
2017	768.83	2943.11	3711.94	258.76	3970.70	6.5
2018	904.80	3151.22	4056.01	121.05	4177.06	2.9
2019	1043.86	3635.56	4679.42	157.29	4836.71	3.3
2020	661.77	3541.99	4203.76	92.79	4296.54	2.2

Exported for slaughter in foreign jurisdictions Sources: ABARES Identifiers AG722, AG723, AB205

It is likely a terminal decline, with live sheep exports falling by 60% between 2008 and 2018, largely due to the increase in “boxed” chilled and frozen meat supplied to Middle Eastern markets in place of or in addition to live sheep. The boxed meat trade is growing rapidly. In 2009, Australia exported 19.9 million kg of boxed lamb to the Middle East. In 2019, it was 57 million kg, an 187% increase.<sup>43</sup>

A member of the current federal government, NSW Liberal MP, Jason Falinski (who has a degree in agricultural economics), has acknowledged that the trade is going to come to an end anyway, and that “the economic rationale for continuing the trade wasn’t strong.”<sup>44</sup>

Slaughtering the sheep in Australia would create more jobs here, he said, adding: “If there’s a way to minimise the distress of the animals, why wouldn’t you take it?”

Although we believe boxed meat is the most obvious alternative to live export, the Animal Justice Party has always advocated for plant-based diets as the best way to improve animal welfare, lessen carbon emissions and improve human health. We also believe there is a lot of opportunity in this sector for Australian farmers as the global shift towards plant-based foods gains momentum around the world. According to Fiona Dyer, consumer analyst at Global Data, *‘the shift toward plant-based foods is being driven by millennials, who are most likely to consider the food source, animal welfare issues, and environmental impacts when making their purchasing decisions’.*<sup>45</sup>

Credit Suisse has estimated the industry is set to grow globally one hundred-fold<sup>46</sup>, and in Australia, consumer expenditure is forecast to grow from \$185 million in 2020 to \$2.9 billion in 2030.<sup>47</sup> Therefore we believe the plant-based protein industry should be considered an option for farmers looking to increase their profits in the future.

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[https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/os-markets/export-statistics/november-2021/2021-mena-market-snapshot-red-meat\\_111121\\_distribution.pdf](https://www.mla.com.au/globalassets/mla-corporate/prices--markets/documents/os-markets/export-statistics/november-2021/2021-mena-market-snapshot-red-meat_111121_distribution.pdf)

<sup>44</sup> <https://theconversation.com/nsw-liberal-jason-falinski-adds-voice-to-push-to-phase-out-live-sheep-trade-96923>

<sup>45</sup> <https://www.forbes.com/sites/michaelpellmanrowland/2018/03/23/millennials-move-away-from-meat/?sh=3d17c210a4a4>

<sup>46</sup> <https://www.afr.com/companies/agriculture/plant-based-food-sector-to-grow-100-times-larger-credit-suisse-20210607-p57yv3>

<sup>47</sup> <https://www.statista.com/statistics/1232959/australia-projected-consumer-expenditure-in-plant-based-meat-sector/>

### **Recommendations:**

1. Follow the example of New Zealand in banning all live export with no exceptions, and in turn, improve Australia's reputation as a country that has the highest standards of animal welfare.
  2. Allow politicians a conscience vote on the issue in Parliament
  3. Start facilitating a transition from exported animals to boxed meat
  4. Invest more time and research into the viability of the plant-based protein market, and offer incentives for farmers who are willing to enter the market.
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### **Conclusion**

Live sheep export to the Middle East is projected to become unsustainable all year round as climate change intensifies and increases the temperature in Middle East countries by an estimated four degrees by 2050. This will bring the temperature above the twenty nine degree threshold identified as the "danger zone" for sheep almost all year round.

Ironically there are many alternatives to live export which would be particularly beneficial financially to Australia such as growing the chilled and frozen meat industry which is completely achievable and in line with good economic policy. Ideally, however, Australia should transition away from animal agriculture to plant based. This would also result in enormous health benefits as well as being a major factor in reducing the effects of climate change; an existential threat being largely ignored politically in this country. Silos between different government departments have a major influence on policies, or rather a lack of policies, to tackle climate change.

Live export has lost its social licence with seventy five percent of Australians opposing the industry. Australia's animal welfare reputation is poor, ranking at an embarrassing level D on the World Protection's Animal Protection Index especially in comparison with that of our neighbour, New Zealand who rate an A along with Austria, Switzerland and the United Kingdom. This animal welfare reputation is affecting our standing in the global community.

The shift away from eating meat globally should send alarm bells to the animal agriculture industry which could be innovative and start to transition away from live export instead of attempting to rationalise that it is acceptable to send animals on an exhausting journey overseas only to be killed in ways which would be illegal in Australia. Our collective social conscience should not allow it. Economics, reputational damage, ethics, the need to mitigate the effects of

climate change and concerns regarding animal welfare all point to the need to transition away from the live export trade.