

RSPCA Australia  
Submission

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## Phase out of live sheep exports by sea

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31 May 2023

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# 1. Introduction

The RSPCA is Australia's most trusted animal welfare organisation. We have engaged with government, industry, regulators, non-government organisations (NGOs) and the community for more than 150 years to improve animal welfare in Australia. As an evidence-based organisation, we promote contemporary animal welfare science to drive policy and social change. Our federation comprises RSPCA Australia and eight state and territory RSPCA member Societies. RSPCA member Societies care for and protect animals across the country through animal shelters, and in most jurisdictions, inspectorate services.

The RSPCA opposes the export of live food animals for immediate slaughter or further fattening in favour of a chilled and frozen meat-only trade. The welfare of animals used for food can be better protected by processing them as close to the farmgate as possible. We advocate for an end to live sheep export because it causes extremely poor welfare. The animal welfare issues inherent to the live export supply chain are cumulative, with long journeys compromising sheep welfare at every stage, after leaving the farmgate to fully conscious slaughter at overseas destinations.

Live export exposes sheep to multiple periods of confinement, handling and a combination of road and sea transport, extreme temperatures, humidity, unfamiliar environments with varied ventilation and high noise and constant movement onboard. During live export voyages, not all sheep can easily access food and water or lie down at the same time, and many experience starvation due to shy feeding, inability to access food or failure to adapt to the unfamiliar pellet feed onboard. Sheep are confined to sweltering pens where they must stand and lie in their own waste for weeks on end. The unhygienic build-up of ammonia and poor ventilation in hot and humid temperatures causes health issues such as respiratory disease and eye infections, and veterinary care is limited. Ship infrastructure can lead to increased risk of entrapment and injury, and there are risks of mechanical breakdown which affects ventilation. The suffering does not end on arrival at overseas ports. Sheep can then be held in hot, humid and crowded feedlots for weeks before being slaughtered while fully conscious. These welfare issues are cumulative and inherent to the trade. The extent of poor welfare cannot be overcome by supply chain adjustments, increased monitoring or legislation.

We commend the Federal Government on its commitment to phase out live sheep export; a commitment that is based on the irrefutable animal welfare science and unwavering community support to end the trade. RSPCA Australia has prepared this submission to inform the Independent Panel (the Panel) and contribute to the Panel's advice on how and when the phase out should occur to best protect sheep welfare. In addition to the provision of our subject matter expertise on animal welfare, in preparing this submission we consulted with individuals and peak bodies from across the live sheep export supply chain, as well as NGOs and regulators.

We ask that the Panel please ensure that the welfare of Australian sheep is central to the advice it provides to the Australian Government on how and when the phase out will occur. We ask that sheep welfare is not subordinated to the human and economic impacts of the phase out. This submission demonstrates that the animal welfare science is clear, and the Australian community will no longer accept such poor and outdated practices. We welcome the opportunity to provide further detail or consultation to secure an end to live sheep export.

## 2. Summary of recommendations

### Mechanism

**Recommendation 1:** The Australian Government must implement the phase out of live sheep export through legislation to ensure a mandatory mechanism to support the end of the trade.

**Recommendation 2:** The Australian Government must expand the Northern Summer Prohibition (to 1 May - 31 October inclusive) in the interim until the end date of Australia's live sheep trade.

**Recommendation 3:** The Australian Government must implement a declining annual cap on the number of sheep allowed to be exported in the interim until the end date.

**Recommendation 4:** The Australian Government must not permit any expansion or reinvigoration of live sheep market access in the interim until the end date.

**Recommendation 5:** The Australian Government must reinforce regulatory compliance and enforcement measures to protect sheep welfare in the interim until the end date.

**Recommendation 6:** The Department of Agriculture, Fisheries and Forestry must introduce mandatory independent third-party inspections prior to loading live sheep for export in the interim until the end date.

**Recommendation 7:** The Department of Agriculture, Fisheries and Forestry must require that Independent Observers attend all live sheep export journeys from Australia in the interim until the end date.

### Timeframe

**Recommendation 8:** The Australian Government must pass legislation in this Parliamentary term and before the 2025 election, to end Australia's live sheep export trade.

**Recommendation 9:** The Australian Government must ensure a short-term phase out period of no longer than three years, from the passing of legislation, to avoid adverse animal welfare outcomes of a long-term phase out.

### Impact and adjustment

**Recommendation 10:** The Australian Government must ensure that animal welfare remains a priority of Australia's live sheep phase out policy, and is not subordinated to economics.

**Recommendation 11:** The Australian Government must mitigate any increased risk to sheep welfare in WA by allocating funding for an animal welfare response package to address any adverse sheep welfare impacts that may arise during the phase out period.

**Recommendation 12:** The Australian Government must address the current processing limitations in WA as highest priority to ensure sheep can be processed as close to the farm gate as possible.

**Recommendation 13:** The Australian Government must invest in road and transport infrastructure for the main arterials from WA to the eastern states to mitigate any animal welfare risks if increased road transport of sheep in Australia is a necessary interim solution.

**Recommendation 14:** The Australian Government must prioritise the review and update of the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (2012).

**Recommendation 15:** The Australian Government must encourage greater leadership from Australia's peak primary industry bodies to invest in the design and delivery of initiatives to support the mental health and wellbeing of Australian primary producers and their communities.

**Recommendation 16:** The Australian Government must incentivise the transition away from live sheep export to alternative markets as part of any structural adjustment package for primary producers.

**Recommendation 17:** The Australian Government must support the expansion of Australia's chilled and boxed meat trade as a more humane and sustainable alternative to live export.

## 3. Mechanism

### ***How should the government implement the phase out of live sheep exports by sea? Why should the government use this approach?***

The government should implement the phase out of live sheep exports by passing legislation in this Parliamentary term. This will provide a definitive end date to enable a measured and enforceable end to the trade within a specific timeframe. The legislative mechanism for the phase out must specifically require interim animal welfare measures including: an expansion of the Northern Hemisphere Summer (NHS) prohibition; disallowance of any new markets or any markets to be reactivated if there has been no activity for the past four years; and a gradual reduction in the number of sheep allowed to be exported each year during the phase out period, until the end date. Increased regulatory enforcement should also be implemented to protect sheep welfare, mitigate adverse market responses and address potential unintended consequences.

### **3.1 Implement the phase out through legislation**

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Legislation is the most viable instrument to ensure a mandated end to live sheep exports and improve sheep welfare. Legislation will protect the welfare of sheep by preventing the continuation of the trade. It will provide certainty for Australian producers and supply chain stakeholders. It will also demonstrate Australia's commitment to animal welfare and reflect community expectation.

A mandated end date via legislation is required to overcome the inherent animal welfare issues and exporter's ongoing resistance to voluntarily transition to more sustainable and publicly acceptable alternatives. Despite a long history of animal welfare catastrophes in the trade,<sup>1</sup> the Australian Livestock Exporters Council (ALEC) only implemented a short-term moratorium in 2019 on sheep exports during the Northern Hemisphere Summer<sup>2</sup> (NHS) in response to community outrage that emerged from public exposure to multiple animal welfare disasters at sea and awareness of what sheep experience onboard live export vessels. Therefore, concerted attempts to improve animal welfare over the past five years have only occurred because public awareness highlighted the need for stronger regulatory controls.

Poor sheep welfare has continued despite developments in Australia's live export regulatory framework in the past five years such as modifications to the Australian Standards for the Export of Livestock (ASEL), updates to the Export Supply Chain Assurance System (ESCAS), introduction of the NHS prohibition, and amendments to the *Export Control (Animals) Rules*, and the requirement for Independent Observers (IO) to be on board long-haul journeys. For example, since 2018, at least 70% of IO reported journeys have recorded sheep exhibiting indicators of heat stress. This highlights that regulatory attempts to mitigate the risk of heat stress over the past five years, such as additional conditions for export regarding breed, body weight and wool length have been largely ineffective in improving sheep welfare. This is because sheep cannot physiologically withstand long, hot, humid journeys at sea and over the equator. No amount of regulation can address the cumulative animal welfare issues that are inherent to the trade. Therefore, the most viable policy solution is to mandate an end to the trade. Legislation will direct market activity to more humane, publicly acceptable and sustainable pathways.

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<sup>1</sup> RSPCA Australia website. [Live export timeline of tragedy](#) – accessed May 2023.

<sup>2</sup> Australian Livestock Exporters Council website. [News page – Sheep moratorium part of industry re-set](#) - accessed May 2023

Implementing the phase out through legislation will provide certainty for Australian farmers and other supply chain stakeholders. This is important as it will ensure the best opportunity to invest in appropriate planning and minimise adverse animal welfare consequences. By legislating the phase out, the government will provide certainty and clarity. Farmers will not be left wondering where to next and will be able to confidently plan for alternative markets and transition their practices away from live export from a known end date.

Legislating an end date will demonstrate strong leadership from the Australian Government on animal welfare by enacting policy that most Australians support. Domestically, legislation will affirm for the community that its government is definitively enacting an end to Australia's live sheep trade. Research shows Australians are increasingly concerned about animal welfare, perceive the Federal Government as "highly responsible" for animal welfare and expect public policy to protect animals<sup>3</sup>. As live export is one of the key areas where the Federal Government has jurisdictional power to improve animal welfare, it should act definitively to ensure an end to live sheep export.

**Recommendation 1:** The Australian Government must implement the phase out of live sheep export through legislation to ensure a mandatory mechanism to support the end of the trade.

### 3.2 Expand the Northern Hemisphere Summer prohibition

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An expansion of the NHS prohibition is required to mitigate the impact of live export on sheep welfare during the phase out period. Scientific literature substantiates that sheep should not be transported by sea to the Middle East between 1 May through to 31 October because the sustained heat and humidity during these months exceed the known heat risk threshold of sheep.<sup>4 5 6</sup> The Australian Veterinary Association (AVA) stated in its 2018 submission<sup>7</sup> to the McCarthy Review that:

*Irrespective of stocking density, thermoregulatory physiology indicates that sheep on live export voyages to the Middle East during May to October will remain susceptible to heat stress and die due to the expected extreme climatic conditions during this time. Accordingly, voyages carrying live sheep to the Middle East during May to October cannot be recommended.*

This advice is supported by a significant body of evidence that shows sheep suffer in such conditions, and that export during the northern summer increases the risk of temperature-related welfare impacts (such as heat stress, evidenced by open-mouthed panting, breathlessness and inappetence). This, coupled with evidence forecasting that the globe's future climate is expected to be more variable with greater frequencies and intensities of very hot periods<sup>8 9 10</sup> increases the urgency of a phase out of live sheep export. Therefore, an expansion of the NHS prohibition to include 1 May through to 31 October during the phase out period will provide a mechanism to help mitigate some of the inherent risks of the trade, particularly those associated with increasing temperatures.

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<sup>3</sup> Futureye (2018). Commodity or Sentient Being? Australia's Shifting Mindset on Farm Animal Welfare.

<sup>4</sup>AVA. (2018) A short review of space allocation on live export ships and body temperature regulation in sheep. Department of Agriculture McCarthy Review, Australian Veterinary Association.

<sup>5</sup>Barnes, A, Phillips C, Fisher A. (2019). Final report by the Heat Stress Risk Assessment Technical Reference Panel. Agriculture, D.o. (Ed.), Commonwealth of Australia, Canberra.

<sup>6</sup> Carnovale F, and C Phillips. (2020). The Effects of Heat Stress on Sheep Welfare during Live Export Voyages from Australia to the Middle East. *Animals* 10, no. 4: 694.

<sup>7</sup> AVA, (2019). AVA Submission to the Draft Report by the Heat Stress Risk Assessment (HotStuff) Technical Reference Panel. Department of Agriculture HSRA Review, Australian Veterinary Association.

<sup>8</sup> Tadesse D, Puchala R, Gipson TA & Goetsch AL (2019). 'Effects of high heat load conditions on body weight, feed intake, temperature, and respiration of Dorper, Katahdin, and St. Croix sheep', *Journal of Applied Animal Research*, vol. 47, no. 1, pp. 492-505

<sup>9</sup> Thornton P, Nelson G, Mayberry D, & Herrero, M. (2021). 'Increases in extreme heat stress in domesticated livestock species during the twenty-first century', *Global Change Biology*, vol. 27, pp. 5762– 5772.

<sup>10</sup> Zhang Y & Phillips CJC (2019). 'Climatic influences on the mortality of sheep during long-distance sea transport', *Animals*, vol. 13, no. 5, pp. 1054-1062

**Recommendation 2:** The Australian Government must expand the Northern Summer Prohibition (to 1 May - 31 October inclusive) in the interim until the end date of Australia’s live sheep trade.

### 3.3 Cap the number of sheep that can be exported in the interim

A gradual reduction on the number of sheep allowed to be exported from Australia in any given year of the phase out period will be required to mitigate the risk of adverse market responses. Regulatory control will be required to mitigate the probability of a surge in the supply of sheep for export in the final period of the trade as producers and exporters aim to optimise market opportunities. The cap should be applied through regulation and specifically prescribe a declining maximum quota for each year of the phase out period. This will immediately reduce the number of sheep that continue to be exposed to poor welfare by encouraging an active transition away from live exports by supply chain stakeholders.

The mechanism to implement the declining annual cap could be the Department of Agriculture, Fisheries and Forestry’s (DAFF) existing permit system. That is, the annual cap could be regulated by limiting the number of export permits provided. A cap required on the total number of permits provided for sheep export for each year from now until the agreed end date would ensure that only the limited number of sheep allowed to be exported for that year could be monitored and controlled. This would enable a gradual reduction in the number of sheep exported annually. Furthermore, the provision of export licences could be based on the assessment of exporters’ animal welfare outcomes and compliance reports, and only provided to those that uphold or exceed animal welfare indicators across the supply chain. Data from the last three years demonstrates an average of 14 journeys per year have transported live sheep.<sup>11</sup> Therefore, the number of live sheep and respective journeys could be scaled back in each year of the phase out.

A cap will also ensure that overseas markets do not drive an increase in the supply of Australian sheep, or resuscitate the trade in Australia. We suggest implementing an initial cap of less than 520,000 head as per the 2022 export figures. The primary intention of ending live sheep export is to improve the welfare of Australian sheep.

**Recommendation 3:** The Australian Government must implement a declining annual cap on the number of sheep allowed to be exported in the interim until the end date.

### 3.4 Disallow new or reinvigorated markets for live sheep exports

The phase out mechanism should prohibit the development of any new or reinvigorated markets and supply chains for live sheep exports during the phase out period. Disallowing additional or dormant markets to emerge will be integral to foster an active reduction of sheep that are exported live. Ensuring that no new or invigorated markets are allowed to be developed under ESCAS will foster alternate pathways for Australian sheep. This certainty is needed to reiterate to Australian sheep producers, exporters and importers that Australia’s live sheep trade is winding down, due to the inherent animal welfare issues that have been traditionally subordinated to profit. Any growth in Australia’s live sheep export market will further erode public sentiment for the industry and significantly undermine public trust in the Federal Government’s legitimacy to deliver policy changes that are based on science and supported by the community.

<sup>11</sup> Australian Government. Department of Agriculture, Fisheries and Forestry website. [Reports to Parliament](#) – accessed May 2023.



**Recommendation 4:** The Australian Government must not permit any expansion or reinvigoration of live sheep market access in the interim until the end date.

### 3.5 Strengthen compliance and enforcement measures

The RSPCA appreciates the Australian Government’s recognition that animal welfare failures are common in the live sheep trade, despite Australia’s existing regulatory framework, and cannot be adequately assessed by mortality alone. We caution that animal welfare failures could become even more prevalent during the phase out period. That is, market response to the phase out may result in a decline in standards and non-compliance with animal welfare regulation. This could result in decreased investment in infrastructure maintenance, reduced attention to staff training and less attention to the details that impact animal welfare. Attempts to export more sheep in the phase out period could result in more animals that are not fit for the journey being transported, and ultimately cause poorer animal welfare outcomes.

Evidence shows a history of poor compliance and enforcement in Australia’s live sheep export trade. Despite current regulation requiring exporter compliance on factors such as wool length, stocking density per pen, minimum condition scores on loading, animal welfare continues to be compromised in the trade with little to no recourse to date. Analysis of all IO reports published between 2018-2022 illustrates an existing prevalence of poor on board practices and an ongoing lack of compliance with existing standards that has led to poor sheep welfare outcomes - see Table 1 below.

**Table 1 – Frequency of issues identified by IOs on board 44 reported live sheep export journeys from 2018-2022**

Issue noted	# Incidences
Feed provision	9
Fit to load	7
Handling	7
Infrastructure	7
Loading	1
Overstocking	7
Record keeping	4
Water provision	8
Wool length	3
Unloading	5
Animal treatment	5
Communication	1
Staff training	1

Table 1 depicts that poor animal welfare remains prevalent in the trade. Issues such as feed and water provision continue to occur including mouldy feed, poor quality feed that sheep will not eat when the pellets become powdery ‘fines’, sheep struggling to reach the feed trough due to long horns, and fit to load issues repeatedly occurring including animals with wounds, eye disease and sheep with poor body condition being loaded. Other commonly reported issues include overstocking initially when loading, only to fix this whilst at sea to meet ASEL requirements, as well as poor handling techniques, inattentive animal treatments, smothering at unloading and poor record keeping.

Poor welfare has continued to occur at a time when Australia’s live export industry had supposedly been “fixed”, during a period when exporters were actively defending their social license to operate, and allegedly operating at the highest possible standards in the aftermath of the Awassi Express, and multiple other events that demonstrated poor sheep welfare in the trade. A key example is the MV Maysora (IO report 193) which exported 14,000 sheep in October 2019 with wool length longer than their stated Heat Stress Risk Assessment (HSRA). The majority of the 39,733 sheep on board exhibited high heat stress scores. Unfortunately, this, and other reports of non-compliance and issues on board, demonstrate that the industry already operates below regulatory standards and supports the need for heightened compliance monitoring.

A more robust and transparent compliance management framework is needed during the phase out period to ensure animal welfare outcomes are not further compromised. Australia’s enforcement regime must be strengthened during the phase out period to mitigate the increased risks to sheep welfare. This should include the introduction of mandatory independent third-party inspections prior to loading, during the phase out period, to ensure compliance with animal welfare standards. In addition, ensuring that IOs are on board all remaining live sheep journeys is also vital to enable independent monitoring on board.

**Recommendation 5:** The Australian Government must reinforce regulatory compliance and enforcement measures to protect sheep welfare in the interim until the end date.

**Recommendation 6:** The Department of Agriculture, Fisheries and Forestry must introduce mandatory independent third-party inspections prior to loading live sheep for export in the interim until the end date.

**Recommendation 7:** The Department of Agriculture, Fisheries and Forestry must require that Independent Observers attend all live sheep export journeys from Australia in the interim until the end date.

## 4. Timeframe

### ***What is an appropriate timeframe to phase out live sheep exports by sea? What are your reasons for proposing this timeframe?***

The RSPCA calls for an end date to live sheep exports to be legislated in this term of government with an early as possible phase out period of no longer than three years. The timing and pace of the phase out will have significant impacts on animal welfare. Acknowledging the Australian Government's intention to phase out live sheep exports in a measured way, we recommend this moderate timeframe to strike a balance between improved sheep welfare and adequate time for supply chain adaptation.

#### 4.1 Legislated end date in this term of government

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Passing legislation in this term of government with a specific end date is imperative to ensure a definitive end to the trade, to improve animal welfare and to provide certainty for Australian producers and other supply chain stakeholders. The RSPCA understands the Australian Government does not intend to implement the phase out in this term. However, ensuring an end date is legislated before the current Parliamentary term ends will safeguard the policy. This is imperative to improve sheep welfare and enable time for industry stakeholders to plan and adapt within a reasonable timeframe. Legislation in this term will also provide a definitive signal to the community that the trade will end and that the Government is delivering on its election commitment.

**Recommendation 8:** The Australian Government must pass legislation in this Parliamentary term and before the 2025 election, to end Australia's live sheep.

#### 4.2 Early as possible end date - phase out within three years

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Because of the animal welfare implications, the RSPCA would like to see an early as possible end date, with an absolute maximum of three years from the passage of legislation. There are three options for the duration of the phase out period, and each will likely appeal to different stakeholder groups. The first is an immediate phase out, which is likely the expectation of the Australian public. The second is short-term phase out period, which we believe aligns with the Government's preference to implement the phase out in "orderly way", with "proper planning".<sup>12</sup> And the third, is a long-term phase out period, which will likely appeal to the industry. We discuss these options here and highlight the animal welfare risks of each.

##### **Immediate phase out**

A swift and decisive phase out mechanism is required; however, the RSPCA cannot support an immediate phase out because of the animal welfare implications. The impact of an immediate phase out on Australian sheep would increase the risk of inhumane culling of sheep as producers struggle to manage the oversupply of sheep on the domestic market. An immediate phase out would not enable adequate time for market adaptation, nor sufficient time to address existing structural barriers such as labour shortage and domestic abattoir capacity. We understand that producers will require time to plan, adjust, potentially reduce sheep production and/or commit to alternate pathways for sheep turn off – these factors must be addressed by the phase out policy.

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<sup>12</sup> Senator the Hon Murray Watt, Minister for Agriculture, Fisheries and Forestry (03/03/23). [Panel underway on live sheep export phase out](#).

### **Short-term phase out period**

The RSPCA recommends a short-term phase out period. That is, we call for an early as possible phase out with a duration of no longer than three years from passing legislation. A short-term duration would mitigate poor welfare impacts on Australian sheep. It would provide certainty for the industry, enable time for policy instruments to address and resolve existing structural barriers, and deliver community expectations within a timely manner. Importantly, an early as possible end date must be legislated in this Parliamentary term to safeguard the phase out policy, should there be a change in government.

RSPCA supports the need for a phase out timeframe that enables industry adequate time to transition out of live sheep exports and adapt to alternate markets. Our recommended timeframe has considered the barriers to change discussed in section 6.2 and provides for sufficient time in accordance with recent economic analysis. Several recent reports have indicated that Australia's transition from live sheep exports to chilled and boxed meat exports would occur relatively swiftly, and that market adaptation will likely occur within the short term.<sup>13 14</sup> We believe that three years provides producers sufficient time to adjust breeding flocks and gradually modify sheep holding to appropriate levels according to the market. Certainty on when the end date takes effect will support informed decisions on how many breeding ewes to maintain year on year from lambs, and where to invest for their future seasons.

### **Long-term phase out period**

Animal welfare risks will increase with the length of the phase out period given that hundreds of thousands of sheep will continue to be exposed to extremely poor welfare each additional year that the trade continues. Based on the number of sheep that have been exported in the past two years, if the government implemented a phase out period with no other mechanism to limit the export of sheep, at least 500,000 additional sheep per year will be impacted. Based on the past five years of IO reports, around 350,000 (or at least 70%) of those sheep would suffer from heat stress. Based on the data published in the Parliamentary reports from 2020 and 2021 on the number of animal deaths on live export vessels, approximately 1,500 sheep would die in each additional year of the phase out duration. A long-term phase out would also result in additional impacts that would further erode any care or protection of sheep welfare. This could include difficulty for a retiring industry to retain quality labour for critical services (such as vets, stockpersons, handlers etc), divestment from industry animal welfare research relating to the trade, and the likely decline in the desire or perceived need for regulatory compliance (as discussed above in section 3.5).

We caution that a longer phase out period will cause significant and ongoing issues. In addition to increased animal welfare risk, this will include greater market uncertainty and instability for industry stakeholders, lack of market confidence, and community backlash. A long-term phase out period will increase the risk of more animal welfare catastrophes occurring. Increased regulatory controls would be required for a longer duration adding fiscal pressures and additional regulatory burden for both DAFF and supply chain stakeholders. Live sheep export is an inherently risky trade and the longer it continues, the inevitability of breaches, accidents, breakdowns, and public exposes will increase. This risk will continue to harm Australia's international reputation and could threaten trade opportunities. In addition, a longer phase out period will lock industry stakeholders into a slow and unsustainable decline. Exporters will leave the Australian market, and domestic industry will forgo the opportunity to dynamically pivot to more lucrative and sustainable market alternatives. Moreover, a long phase out will not be publicly popular. Australian public sentiment against live export is strong and has increased over time.<sup>15</sup> Therefore, it is vital to recognise that the length of the phase out must balance

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<sup>13</sup> Nelson, R. Mornement, C. Bruce, M. Weragoda, A. Litchfield, F. and Collins, P (2021). The economic impacts of regulating live sheep exports. Australian Bureau of Agricultural and Resource Economics.

<sup>14</sup> Davey, A. Fisher, R. Morley, M. (2022) Pegasus Economics report – Economic implications of phasing out the live sheep export trade.

<sup>15</sup> McCrindle (2022), Public Perceptions: RSPCA Australia Brand tracking Report 2022 – relevant excerpts can be provided on request.

these risks and that the government must be prepared to clearly articulate the rationale behind the selected duration. The RSPCA will be highly critical of any phase out duration exceeding three years as this will severely risk animal welfare.

**Recommendation 9:** The Australian Government must ensure a short-term phase out of no longer than three years, from the passing of legislation, to avoid adverse animal welfare outcomes of a long-term phase out.

## 5. Animal welfare impacts

We acknowledge that there are multiple stakeholders who will be impacted by a phase out. The RSPCA consulted with many stakeholders from across the supply chain in preparing this submission. This included primary producers in WA, peak industry bodies, NGOs, and various agribusinesses. However, the welfare of Australian sheep is central to the government's policy intention and at the heart of community sentiment to end the trade. We note that the Consultation Paper does not include any questions on the impact and adjustment required to better protect the welfare of Australian sheep. Therefore, in this section we outline the impact that a phase out can have on Australian sheep and their welfare. We then address relevant questions from the Consultation Paper.

### 5.1 Sheep welfare must be a priority

Sheep welfare has been at the centre of this government policy and should be at the centre of considerations for the phase out. Between 2018-2022 alone, more than four million sheep were exported live and exposed to unacceptable conditions.<sup>16</sup> An end to the trade will provide significant improvements to sheep welfare in Australia. We call on the Panel to strongly recommend that sheep welfare must not be forgotten amidst the highly charged debates about the phase out policy. Sheep welfare must not be diminished amidst the human and economic impacts that have dominated the narrative during the Panel's consultation period.

The RSPCA's recommendations within this submission aim to improve animal welfare and mitigate risks to Australian sheep. Ideally, our recommendations will be wholly implemented, to optimise the scale and impact of welfare improvements for Australian sheep. Through a well-planned phase out, animal welfare can take priority and economic impacts can be addressed with community and farmer wellbeing appropriately cared for.

**Recommendation 10:** The Australian Government must ensure that animal welfare remains a priority of Australia's live sheep phase out policy, and is not subordinated to economics.

### 5.2 Oversupply of sheep

Animal welfare risks will likely emerge in the event of a market surplus. Live sheep export has traditionally provided an alternative market for producers to turn off surplus animals. We understand producers are concerned by how to manage surplus sheep when live export is no longer an option. It is important that planning opportunities and confidence is provided to producers as soon as possible to ensure there are adequate pathways for the lambs that will be born in 2023 and 2024.

The RSPCA has been advised that there is a current sheep surplus in WA, in the vicinity of 800,000 to 1.5 million. While unsubstantiated or verified, a current oversupply would be historic and cannot be causally linked to a phase out policy. However, RSPCA is concerned that surplus sheep could be at considerable risk for poor welfare outcomes. This risk extends to the reputation of WA sheep producers and Australia's international reputation. Therefore, funding should be provided to address the potential risk of sheep surpluses and assist producers to maintain animal welfare standards and humane sheep management practices during the phase out period.

<sup>16</sup> Australian Government, Department of Agriculture, Fisheries and Forestry website. [All Livestock Exports page](#), All livestock exports by market 2018-2023 (excel report) – accessed May 2023.

**Recommendation 11:** The government must mitigate any increased risk to sheep welfare in WA by allocating funding for an animal welfare response package to address any adverse sheep welfare impacts that may arise during the phase out period.

### 5.3 Long distance transport

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RSPCA advocates that all animal transport journeys must be as short as possible in terms of the time travelled. This is because transportation can cause significant stress for animals and often involves high risk of adverse welfare outcomes. The degree of stress and risk involved differs for each individual animal depending upon multiple factors such as the species, age, health, and domesticity of the animal<sup>17</sup>. For sheep in particular, animal welfare science substantiates that long journeys are a significant stressor.<sup>18</sup> Because of the inevitable stress and high risk for suffering associated with transport, we advocate for the humane slaughter of animals used for food as near as possible to the point of production<sup>19</sup>.

Based on our consultation with stakeholders from across the supply chain, we understand that an impact of a phase out policy could be increased market pressures to transport more sheep across the Nullarbor to South Australia and the eastern states. While we acknowledge that the duration and severity of live sheep export by sea has a greater cumulative effect on sheep welfare than long-haul road transport does, the RSPCA does not support this as anything but an interim measure given the animal welfare impacts with transporting sheep on long journeys across the country. The primary goal should always be to process sheep as close as possible to the farmgate to minimise the welfare impacts of transport. For this reason, priority should be given to maximising opportunities for processing in WA, rather than transporting sheep on long road journeys. Rapid investment to expand abattoir capacity, improve road and housing infrastructure to support these pathways, and expansion of meat processing capability may be able to reduce the need to transport sheep long distances and mitigate the risk of adverse welfare outcomes.

**Recommendation 12:** The Australian Government must address the current processing limitations in WA as highest priority to ensure sheep can be processed as close to the farm gate as possible.

If long distance transport of sheep becomes a necessity to manage surplus sheep during the phase out period, appropriate investment in Australia's road transport infrastructure must be prioritised and funded. Priority must be given to the common routes for sheep and other livestock and investment should specifically include building climate-resilient roads; appropriate loading and unloading facilities (including ramps); sufficient effluent disposal facilities to avoid spillage onto roads; and adequate spelling facilities to ensure that animals can rest after a journey that has reached the maximum time off water limit, where sheep are able to access food and water, and lie down comfortably with protection from the elements.

National standards for the land transport of livestock exist in Australia. The Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (2012)<sup>20</sup> provide minimum legal requirements that aim to reduce animal welfare risks during transport. However, these Standards and Guidelines are overdue for review and should be improved to align with contemporary animal welfare science. State and territory RSPCAs have received ongoing reports over time about animals' fitness for

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<sup>17</sup> RSPCA Policy F1 Transportation of Animals – general principles. Accessed online May 2023.

<sup>18</sup> European Food Safety Authority (2022). *Welfare of small ruminants during transport*. EFSA Journal. Accessed online May 2023.

<sup>19</sup> RSPCA Policy F2 Transportation of livestock for slaughter. Accessed online May 2023.

<sup>20</sup> Australian Government, Department of Agriculture, Fisheries and Forestry (2012). *Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock*.

the intended journey and adherence to the fit to load criteria as prescribed in the Standard. Adequate monitoring and enforcement of the Standards is currently required, and investment would need to be ramped up if sheep are to be transported from WA to eastern states because of the live export phase out. A well overdue review of the Standards & Guidelines would also provide further opportunity to strengthen key aspects of the transport process that impact livestock welfare, including time off water, space requirements, curfews, temperature limits, and animal handling.

**Recommendation 13:** The Australian Government must invest in road and transport infrastructure for the main arterials from WA to the eastern states to mitigate the animal welfare risks if increased road transport of sheep is a necessary interim solution.

**Recommendation 14:** The Australian Government must prioritise the review and update of the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (2012).

## 5.4 Human-animal wellbeing

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Australia's phase out of live sheep exports is an emotionally charged issue. The RSPCA understands that there are impacts on people working across the supply chain, and acknowledge the important link between human and animal health and wellbeing. We are aware that many producers feel surprised, disempowered and frustrated by the imminent loss of a market for sheep. Poor human mental health has been shown to have consequences for animals. Research highlights that poor mental health amongst farmers can lead to poorer animal welfare outcomes. Programs designed to address farmer wellbeing, and initiatives intended to safeguard animal welfare, have also been shown to assist both people and animals, providing there is openness to both outcomes, resources, and mechanisms to support these outcome<sup>21</sup>. Our concern extends to the wellbeing of Australia's regional communities which may also experience challenges during the transition, if not appropriately supported. Therefore, this must be a consideration for the phase out period and into the future.

The RSPCA would like to see the state and federal peak bodies for primary producers take a leadership role to better support their members. The role of the peak bodies in any phase out policy should be to provide leadership in two key areas. The first is by providing information and guidance on how producers can prepare for and respond to changing social and political contexts of the environment within which they operate. This will ensure that their sectors, and respective members, are informed of social expectations and political agendas. RSPCA's experience in engaging with primary producers is that they adapt and respond to meet challenges every day, from seasonal changes to unexpected weather events and market responses. The prospect of ending live sheep export has been on the horizon for decades, and has featured in election commitments of multiple Australian political parties over the past five years. The second area of leadership required by peak bodies is the provision of programs to support their members' mental health and wellbeing.

**Recommendation 15:** The Australian Government must encourage greater leadership from Australia's peak primary industry bodies to invest in the design and delivery of initiatives to support the mental health and wellbeing of Australian primary producers and their communities.

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<sup>21</sup> Farm Animal Welfare Committee (2016). Department for Environment, Food and Rural Affairs in England and the Devolved Administrations of Scotland and Wales. [Opinion on the links between the health and wellbeing of farmers and farm animal welfare](#).



## 6. Impact and adjustment

This section of the submission responds to questions relevant to the RSPCA's subject matter expertise on the general impacts and adjustments required to enable a phase out of live sheep exports, as asked in the Consultation Paper.

### ***What will the phase out mean to you, your organisation, supporters and community?***

#### 6.1 Strong and increasing community support for the phase out

The RSPCA has long advocated for an end to live sheep exports. A government-led transition out of the trade will be a milestone reform for Australia that delivers what the community has been calling for, for decades. There is repeated and strong evidence highlighting strong consumer support for improved animal welfare in Australia, and long-standing community support to end live sheep export.

Our consumer sentiment data, which spans more than a decade from 2009-2023, shows that public concern for live export has been consistently increasing. It also shows that support for a phase out remains consistently high. In addition, 6972 RSPCA Supporters have endorsed this submission by 5pm AEST on Wednesday 31 May 2023 - we will forward the individual testimonials from those who agreed for RSPCA to provide their comments to the Panel in a separate document to this submission.

Roy Morgan research (2022) showed that 98% of Australians consider animal welfare important and 80% support more government action to improve animal welfare<sup>22</sup>. In the RSPCA's most recent *Public Perception Report* (2022), 78% of respondents indicated that animal welfare is extremely or very important, and this has increased by ten percentage points since 2018.<sup>23</sup>

On live export specifically, it is clear that Australians oppose the trade. As some examples:

- The level of concern about live animal export has increased from 49% in 2009 to 76% in 2018.
- When asked if they would support a phase out of live sheep exports if affected farmers were provided assistance to transition, 77% said yes in 2018 and 78% yes in 2022 (see Table 2).
- This includes 79% of West Australians, higher than the national average.
- Repeated surveys have shown significant opposition to live export, regardless of location. For example, a January 2022 survey conducted by the Digital Edge among a representative sample of 1502 Australians found 67% of Australians support an end to live export and a consistent response across states and territories, and regardless of rurality (see below)<sup>24</sup>.

**Table 2 – Consistent support for an end to live sheep export by state / territory when asked whether they would support a phase out of live sheep exports if affected farmers were provided assistance to transition<sup>23</sup>**

National	NSW	VIC	QLD	TAS	NT	SA	WA	ACT
78%	77%	79%	75%	80%	82%	79%	79%	77%

**Table 3 – Consistent support for an end to live animal export by state / territory<sup>24</sup>**

NSW	VIC	QLD	SA	WA	Other
68%	68%	62%	66%	70%	64%

<sup>22</sup> Roy Morgan Research (2022). Attitudes to Animal Welfare.

<sup>23</sup> McCrindle (2022), Public Perceptions: RSPCA Australia Brand tracking Report 2022 – relevant excerpts can be provided on request.

<sup>24</sup> DigitalEdge Omnibus Poll conducted in the week of 17 January 2022.

**Table 4 – Consistent support for an end to live animal export regardless of location<sup>25</sup>**

Capital city – CBD or inner-city suburb	Capital city – suburbs	Small city (non-capital city)	Town	Rural or country area
70%	66%	66%	66%	66%

Analysis of the age demographics of respondents also indicates that the issue of live sheep export will not diminish. Rather, it will continue to be of concern, and community sentiment against the trade is likely to increase as Australia’s younger generations become eligible to vote. For example, in the 2022 survey that asked whether Australians would support a phase out of live sheep exports if affected farmers were provided assistance to transition, the ‘yes’ vote was 83% of Generation Z, 82% of Generation Y, 79% of Generation X, 72% of Baby Boomers and 67% of ‘Builders’. These data indicate that neither the social nor political pressure for Australia to transition out of live sheep export to more humane, sustainable and publicly acceptable is not going to go away.

Most recently, independent polling conducted by McCrindle in May 2023, indicates that public support for a phase out remains strong. Despite the significant volume of media coverage in WA consumer and rural media in support of live sheep export, 71% of West Australians support the Australian Government’s policy to phase out live sheep export. The question was very direct: ‘The Federal Government is planning to phase out live sheep exports from Australia by sea. Do you support this policy?’ (with a link to the Department’s webpage). There can be no doubt that this was an objective, direct question that asked specifically for West Australians’ views on the current policy.

The survey also showed that 88% of West Australians think the Federal Government should support farmers and others to transition out of live sheep exports. It found very similar views across metro and regional WA. For example, 72% of metro WA residents and 69% of regional WA residents support a phase out. This polling shows that West Australians, whether in cities or in regional areas, clearly and unequivocally oppose live sheep export and want to see it phased out.

***What barriers and/or constraints might there be for exporters, farmers, and other participants across the supply chain to transition away from live sheep exports by sea?***

## 6.2 Barriers to transition away from live sheep export

The RSPCA recognises that there are several structural issues that the phase out policy will need to overcome to enable effective implementation. Based on our consultation with supply chain stakeholders, we understand that these include Australia’s current agricultural skills and labour shortage; an oligopoly within WA’s slaughter facility operators; limited processing capacity of WA slaughter facilities; the complexity of farming systems; and limited housing available for the required workforce. We believe these issues are short-term and can be addressed within a two-to-three year period to enable a soon as possible end date.

The phase out must ensure an adequate workforce is available to address the increased demand for domestic processing in WA. The Australian Government has reported that it is ahead of schedule, having increased the number of workers by 44%<sup>26</sup>. This demonstrates that workforce shortages are currently being addressed to help resolve long-standing workforce issues in the agricultural sector.

<sup>25</sup> DigitalEdge Omnibus Poll conducted in the week of 17 January 2022.

<sup>26</sup> Prime Minister of Australia [media release \(02/02/23\)](#).

Senator Watt has indicated that these workers are now providing skills and labour in Australia's agricultural sector, which will help Australian farmers and meat processors fill workforce gaps<sup>27</sup>.

As discussed in section 5.3, and specifically in Recommendation 12, priority should be given to increasing abattoir capacity in WA. This may take the form of increasing capacity of existing facilities or building additional facilities. Similarly, existing housing shortages to ensure workers can be accommodated in rural and regional communities proximal to new and / or existing slaughter facilities are also required. Both these initiatives will foster economic activity and growth in WA rural and regional areas.

We recognise the complexity of farming in WA, and that many primary producers perceive that there are few alternate, profitable markets for sheep in the event of extreme weather events and climatic conditions that do not support long growing seasons for lambs. We understand that sheep are an important part of farm operations for weed control, paddock rotation and to diversify income potential and mitigate the risk of relying solely on cropping. Therefore, it is important for primary industry peak bodies and the Government to build sheep producer confidence in the existing alternate pathways for sheep as discussed above.

### ***How should supply chain participants be supported as they transition away from live sheep exports by sea?***

The RSPCA supports the concept of a structural adjustment package to assist the transition out of live sheep export.

## **6.3 Structural adjustment to incentivise transition**

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Government-supported structural adjustment could take the form of compensation for initial price adjustments experienced by Australian sheep producers resulting from the phase out. The package could also be designed to resolve specific structural issues, such as the lack of processing capacity in WA. This would likely take shape via transitional government funding for infrastructure, labour and housing to enable increased capacity of processing facilities in WA and absorb the increased supply of sheep that will be diverted from live export into the domestic market.

The RSPCA encourages the panel to consider adjustment packages that increase the confidence of producers that they will receive a fair and reasonable price for lambs and wethers that have historically been sent to the live export market. Therefore, financial support for WA sheep producers should be considered as part of a transition investment. This may include ensuring there are markets for wethers (for mutton), the most common sheep class sent by live export.

**Recommendation 16:** The Australian Government must incentivise the transition away from live sheep export to alternative markets as part of any structural adjustment package for primary producers.

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<sup>27</sup> Senator the Hon Penny Wong, Minister for Foreign Affairs (02/02/23). [Government delivers on expanding the Pacific workforce – six months early.](#)

## 7. Opportunities

***What opportunities should the government and/or industry pursue in the lead up to and following the transition out of live sheep exports by sea? (e.g., expanding domestic processing and value adding, increasing sheep meat exports, other)***

The phase out will generate immediate benefits to animal welfare. There are also several medium and long-term opportunities that can be realised. We discuss these in this final section of the submission.

### 7.1 Improve Australia's international reputation

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The Australian Government has an opportunity to improve Australia's international reputation with the phase out. Australia's reputation has suffered severely as a result of live exports. While not economically necessary for Australia, live export is damaging the perception that people overseas have of Australia as a progressive country that acts ethically and sustainably<sup>28</sup>. Animal welfare is an increasingly important factor for industry sustainability, and Australia's international trade and reputation. Yet Australia's track record on animal welfare is relatively poor, compared to other developed nations. For example, Australia scored a D rating on the global Animal Protection Index (alongside Kenya, Tanzania, Romania, Russia, Romania, etc), and in relatively poor comparison to other wealthy developed nations such as New Zealand (C rating) and the UK (B rating)<sup>29</sup>. Given Australia's heavy reliance on animal agriculture and increasing community concerns, there is an urgent need for leadership and improvement. Implementing a phase out of live sheep export will signal that Australia now takes animal welfare seriously and is prepared to lead the world on transitioning to more humane and sustainable alternatives.

Australia does not have to participate in live sheep exports to contribute to improved animal welfare standards globally. We can lead by example and positively influence other countries by transitioning out of the trade and demonstrating more sustainable and humane alternatives. Continuing to enable cruelty because other countries are doing so, is inhumane and unethical – the Nett volume of animal cruelty cannot be reduced in the world by participating in it. Assumptions about what other countries may or may not do are not adequate justification. Rather, there is an opportunity to influence improved standards via the World Organisation for Animal Health (the WOA). The WOA is responsible for developing international standards for animal welfare and provides a forum for the development of regional animal welfare agreements<sup>30 31</sup>. Australia provides funding to assist the WOA in its functions and is currently engaged in the development and implementation of Regional Animal Welfare Strategies in both Southeast Asian and Middle Eastern regions<sup>32</sup>. Influencing animal welfare standards through these forums achieves long-term and wide-spread benefits to animal welfare, live sheep export does not. Moreover, leading animal welfare in this way will build on Australia's long-standing involvement in international animal welfare, as a WOA delegate and as having had Australia's Chief Veterinary Officer as past president of the WOA World Assembly of Delegates.

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<sup>28</sup> Bourke, L. (25/01/23). [Australia's 'backwards' animal practices still in the way of free trade deal with Britain](#). Sydney Morning Herald.

<sup>29</sup> World Animal Protection (2020) – [Animal Protection Index, Australia's profile 2020](#). Accessed online May 2023.

<sup>30</sup> World Animal Organisation for Animal Health website – [What we do](#) page. Accessed May 2023.

<sup>31</sup> World Animal Organisation for Animal Health, [Terrestrial Animal Health Code \(2022\)](#).

<sup>32</sup> Australian Government, Department of Agriculture, Fisheries and Forestry website – [Australian and the World Organisation for Animal Health page](#). Accessed May 2023.

There is also an opportunity for Australia to influence animal welfare standards by supporting the work of civil society groups and through the provision of technical assistance and foreign aid programs. Supporting the work of civil society groups such as RSPCA (UK) International, the World Society for the Protection of Animals, Compassion in World Farming, International Fund for Animal Welfare and Humane Society International will improve global animal welfare standards. These organisations are part of the International Coalition for Animal Welfare and actively pursue programs in developing regions (including those of Australia's live sheep trading partners) to support the implementation of WOA standards. In addition, the Australian Centre for International Agricultural Research (ACIAR) was established to provide research and technical resources to improve sustainable agricultural production in developing countries. Capacity exists for ACIAR to assist regional partners in developing technology to improve animal welfare in production and processing facilities<sup>33</sup>.

## 7.2 Improve the sustainability of Australian agriculture

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Australia's sheep industry is already moving in a positive direction towards improving animal welfare with increased use of pain relief and improved farm practices. The phase out of live sheep export will assist this momentum. Sheep producers undoubtedly care about their animals. There are many sheep farmers in WA who have already acknowledged the irretrievable loss of live exporters' social licence to operate, and have been adjusting their businesses accordingly<sup>34</sup>. Our consultation with multiple producers has highlighted that the full extent of the cumulative sheep welfare issues caused by live export is not fully understood. Therefore, there is an opportunity to promote more humane and sustainable alternatives, and in doing so, improving Australia's agricultural sustainability.

## 7.3 Improve market stability for sheep producers

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There is an opportunity to expand WA's sheep meat trade and support WA's fluctuating production cycles to create a more stable operating environment for producers. Live sheep export has proven to be an inconsistent market option for Australian sheep farmers. Foreign trade policy decisions have destabilised the live trade and left Australian sheep and producers vulnerable. For example, Saudi Arabia (previously one of Australia's largest export markets) withdrew its demand for Australian sheep in 2012 due to concerns that the ESCAS would impinge on its sovereignty. Today, if the live export pathway was an effective tool to absorb the oversupply of sheep in WA, as argued by industry, producers should not be experiencing the oversupply of sheep, as described above. While producers are free to sell surplus sheep to live exporters until the phase out policy is mandated, live exporters are not buying the surplus sheep that remain on the domestic market today. Therefore, the existing live export pathway for surplus sheep is currently not meeting producers' requirements.

While Australia's live sheep exports have been in consistent decline since 2001, the international demand for Australian boxed and chilled sheep meat has consistently and steadily increased over time<sup>35</sup>. Market opportunities for boxed and chilled sheep meat are not limited to the Middle East like live sheep and provide a strong alternative to live sheep exports, with the value of WA sheep meat exports (currently \$576 million) already more than six times that of live sheep exports (\$92 million)<sup>36</sup>. Importantly, ABARES forecasts that the medium to long-term economic forecast for mutton (not just lamb) is also strong which should address producers' need for market demand for wethers. The economic opportunities of phasing out the trade in favour of domestic processing have also been

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<sup>33</sup> Australian Government, Department of Foreign Affairs and Trade website – [Agricultural development and food security page](#). Accessed May 2023.

<sup>34</sup> Nelson, R. Mornement, C. Bruce, M. Weragoda, A. Litchfield, F. and Collins, P (2021). The economic impacts of regulating live sheep exports. Australian Bureau of Agricultural and Resource Economics.

<sup>35</sup> Australian Bureau of Statistics – [7215.0 Livestock Products, Australia, 2018](#). Accessed May 2023.

<sup>36</sup> ABARES, Agricultural forecast and outlook, 2022 Agricultural Commodities Report, Vol. 12.1.

publicly acknowledged by WA sheep farmers including the Chair of the WA Meat Marketing Co-operative (WAMMCO)<sup>37</sup>. Overall, a transition to chilled and boxed meat trade not only provides a more humane alternative to live export, but it also provides producers with a more predictable and expanded market.

**Recommendation 17:** The Australian Government must support the expansion of Australia’s chilled and boxed-meat trade as a more humane and sustainable alternative to live export.

## 7.4 Value-add to supply chain

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Transitioning to domestic processing will also add value to Australia’s supply chains. The Department of Agriculture’s 2019 draft regulatory impact statement indicated that sheep processed domestically contribute significantly more to the Australian economy than those exported live<sup>38</sup>.

## 7.5 Increase employment opportunities

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A 2019 live export industry report estimated that 3,500 Australians are employed in Australia’s live sheep export industry, occupying jobs in transport, shearing, stock handling, brokering and the like<sup>39</sup>. The need for these jobs will continue beyond the phase out of live sheep export as the market adapts and domestic processing increases. Australian sheep will still need to be bred, transported, shorn and processed. In fact, an increase in domestic processing is anticipated to increase total employment. Pegasus Economics has estimated that ending live exports could increase employment in the meat processing sector, alone, by 350 full-time employees due to adjustments increasing wool and prime lamb production<sup>40</sup>. Increased employment opportunities will arise because the production of prime lambs requires more labour per sheep than producing sheep for live export<sup>41</sup>, therefore adding overall value to the existing supply chain.

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<sup>37</sup> Fitzgerald, B. (03/03/23). *Farmers say live ex ban will ‘decimate’ industry*. ABC Radio News - PM.

<sup>38</sup> Department of Agriculture, Water and the Environment (2019). *Live sheep exports to or through the Middle East – Northern Hemisphere summer*, Draft regulation impact statement, 2019.

<sup>39</sup> Mecardo (2019). *Value Analysis of the Australian Live Sheep Export Trade*, September 2019.

<sup>40</sup> Davey, A. Fisher, R. Morley, M. (2022) Pegasus Economics report – Economic implications of phasing out the live sheep export trade.

<sup>41</sup> Department of Agriculture, Water and the Environment (2019). *Live sheep exports to or through the Middle East – Northern Hemisphere summer*, Draft regulation impact statement, 2019.