

RSPCA Australia  
Submission

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# **Inquiry into the Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024**

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11 June 2024

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# Introduction

## RSPCA's position on the Bill

Thank you for the opportunity to provide feedback to the House of Representatives' Standing Committee on Agriculture to inform its inquiry into the provisions of the *Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024* (the Bill) and the Bill's application to the live sheep export trade.

Overall, the RSPCA supports the Bill and a legislated end date of 1 May 2028 in this Parliamentary term. We would prefer an earlier end date given the extreme suffering that sheep experience in live trade. Yet accept that a reasonable transition period is required to enable Australia's sheep industry to adapt to market alternatives. We support the Bill's provision of legislative authority to enable the Commonwealth to administer \$107m in federal funding to incentivise the transition. However, the RSPCA remains concerned about the ongoing risks to sheep welfare during the phase out period. Therefore, we urge the Committee to support the Bill and recommend additional regulatory controls via updates to the Export Control (Animals) Rules and the Australian Standards for the Export of Livestock (ASEL) to mitigate the risks to sheep welfare until the end date. We welcome further consultation.

## About the RSPCA

The RSPCA has been advocating for animals throughout Australia for over 150 years and has grown to be one of the nation's most loved, trusted, and recognised charities. Our mission is to prevent animal cruelty by actively promoting animal care and protection, and our vision is that all animals have a good life. The RSPCA is a federated structure, comprising RSPCA Australia and eight state and territory RSPCA member Societies. We have long engaged with industry, governments, non-government organisations and the Australian community to improve animal welfare across jurisdictions. As an evidence-based organisation, the RSPCA rigorously applies contemporary animal welfare science to inform our policies, positions, advocacy and education programs.

## Good animal welfare

The RSPCA promotes good animal welfare which includes both physical and mental states. Ensuring good animal welfare goes beyond preventing pain, suffering or distress and minimising negative experiences, to ensuring animals can express their natural behaviour in an enriching environment, feel safe, have healthy positive experiences and a good quality of life. Good animal welfare means providing animals with all the necessary elements to ensure their physical and mental health, and a sense of positive individual wellbeing.

Extremely poor sheep welfare is inherent to the live trade. The inherent issues associated with live sheep export include multiple periods of confinement, handling and a combination of road and sea transport, extreme temperatures, humidity, unfamiliar environments with varied ventilation, high noise and constant movement onboard. The suffering does not end on arrival at overseas ports as sheep can then be held in hot, humid and crowded feedlots for weeks before being slaughtered while fully conscious. The extent of poor welfare cannot be adequately overcome by supply chain adjustments, increased monitoring or legislation. Good sheep welfare is impossible to achieve in the live trade, despite regulatory attempts to do so. The adoption of a boxed lamb and mutton meat-only trade is a more humane and sustainable alternative to live export. A legislated end date is required to prevent this suffering which is primarily why the RSPCA supports the Bill as is.

## Summary of recommendations

**Recommendation 1** – The Committee should support the *Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024* as it is.

**Recommendation 2** – The Committee should recommend improved regulatory controls via the Export Control (Animals) Rules and the ASEL to mitigate the risks to sheep welfare issues that will continue until the end date, such as:

- a. implementation of additional technology onboard all live sheep exports to the Middle East to enable real-time, automated, and detailed data capture (e.g. CCTV) and reporting (e.g. WBT, DBT, ammonia levels etc.);
- b. mandatory IO presence onboard all live sheep voyages to the Middle East until the end date; and
- c. expediting the full update of the ASEL from 2026 to 2024-25.

# Need for certainty

A mandated end date via legislation is essential to overcome the inherent animal welfare issues and exporter's ongoing resistance to voluntarily transition to more sustainable and publicly acceptable alternatives. The Bill's provision to legislate an end date for Australia's live sheep trade gives certainty of a mandated end to live sheep exports and to improve sheep welfare. Legislation will protect the welfare of sheep by preventing the continuation of the trade after 1 May 2028 and provide certainty for Australian producers and supply chain stakeholders. It will also demonstrate Australia's commitment to animal welfare and better reflect community expectation.

## For improved animal welfare

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The Bill's definitive end date for the trade, of 1 May 2028, will ensure significant improvements to animal welfare in Australia and a better future for hundreds of thousands of sheep. The RSPCA commends the Australian Government for its leadership on this matter. We are pleased animal welfare has not been overlooked amidst the highly charged debates about the phase out because the scale and impact of welfare improvements that this Bill provides for Australian sheep cannot be underestimated.

The RSPCA is also pleased to see that Australia's ongoing role in influencing international standards through our engagement with the World Organisation for Animal Health (WOAH) is supported in the federal funding allocation. The panel noted that, "Australia can contribute to improved global animal welfare standards without participating in the trade by raising awareness through its diplomatic channels and through international forums and agreements, as it has done on other animal welfare issues." In addition, the need to review Australia's Land Transport Standards and Guidelines is also acknowledged in the funding announcement which will be crucial to supporting continual improvement in animal welfare standards within Australia.

## For Australian producers

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Based on the RSPCA's own consultation with West Australian stakeholders in 2022-23, we understand many producers felt surprised, disempowered and frustrated by the imminent loss of a market pathway for sheep. For this reason, certainty through legislation is vital to enable sheep producers and associated stakeholders to invest in appropriate planning. The Bill provides an important signal to the market with imminent legislation securing certainty and clarity.

While we understand stakeholders engaged in the supply chain may be concerned by the change, the current oversupply and low market price for sheep in WA is not a direct result of this policy decision given that live sheep export vessels continue to be allowed to operate in Australia. As per the panel's report "these factors are being conflated by some stakeholders with the policy commitment, which is exacerbating current low industry sentiment." Clear and definitive action by passing this legislation is important to motivate stakeholders to engage in the transition planning being offered by the Government.

We are also pleased to see that the Bill provides for funding to support the transition, including funding to support farmers mental health and community programs. 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 outcomes<sup>1</sup>.

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<sup>1</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.](#)

# Animal welfare science

There is a significant body of contemporary scientific literature highlighting the extremely poor sheep welfare outcomes that result from live export. For this reason, the RSPCA opposes the export of live animals for slaughter or fattening in favour of a chilled meat trade. Sheep welfare is better protected by processing as close to the farmgate as possible.

The welfare issues inherent to the industry are not 'old issues' as industry repeatedly promotes. Sheep welfare issues have existed since the trade began and cannot be adequately addressed through regulation, hence a mandated end to the trade must be legislated as swiftly as possible. Contemporary animal welfare science and recent analysis of animal welfare conditions onboard live export vessels demonstrate that live trade causes extreme suffering for sheep. A 2022 peer reviewed paper summarises the animal welfare issues caused by the trade on the sea voyage alone. These include starvation, ship motion, ammonia exposure, heat stress, stocking density, unhygienic environments from being confined to accumulating faeces throughout the journey, unnatural lighting, scabby mouth and enteric and respiratory infections.<sup>2</sup> In addition, the European Food Safety Authority (2022) referred to many of the same concerns as being specific to live export by sea and found that "transport of sheep in livestock vessels increases risks for the welfare of animals, as they are exposed to additional hazards."<sup>3</sup> In addition, there are multiple risks that cannot be adequately controlled on board include rough seas, extreme climatic changes, mechanical failures, and geopolitical conflict.

## Starvation

Ready access to fresh water and an appropriate and palatable diet to maintain full health and vigour is considered a basic animal welfare requirement. However, inanition (starvation) is one of the most prevalent causes of death for sheep on board recent live export voyages. The RSPCA conducted an analysis of publicly available IO reports in Australia, between April 2018 when the program commenced, through to May 2023. In that time, 53 of a reported 172 journeys carrying live sheep had an IO on board. The analysis found that inanition or shy feeding was reported in more than 80% of the reports (or 43 reports) as a cause of death or illness on board live export vessels. Inanition commonly results from sheep poorly adapting to the pelleted feed provided on the vessels and refusal to eat leading to starvation, overgrowth of gut bacteria and eventual death if not treated promptly.

## Heat stress

Animal welfare science indicates that wethers - the most exported class of sheep from Australia - can experience heat stress at wet bulb temperatures (WBT) rising above 28 degrees.<sup>4</sup> However, this temperature is regularly exceeded on live export journeys throughout the year – particularly when crossing the equator. This is of significant concern because of the expected increasing frequencies and intensities of very hot periods in future.<sup>5</sup> Research also indicates that the number of days per year of extreme heat and risk of extreme heat stress for ruminants is predicted to double.<sup>6</sup>

The RSPCA's analysis of recent IO reports highlights concerning, but not surprising, statistics on the prevalence of heat stress as reported in available IO reports. More than 60% of IO reports (32 reports) listed indicators of heat stress from score 1-4, ranging from increased respiratory rates through to sheep with neck extended and open mouth panting. In addition, more than 30% of IO reports (17 reports) included a description that was interpreted to equate to a heat stress score of 3 or more (i.e. open mouth panting +/- tongue protruding) which indicates significant heat stress.<sup>7</sup>

## Fatigue

A 2024 animal welfare science study highlighted that the impact of cumulative stress, fear and anxiety associated with transport<sup>8 9</sup> could result in mental fatigue in sheep<sup>10</sup>. While studies specifically on fatigue in sheep are few, there is

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<sup>2</sup> Phillips CJC (2022) Zoonotic Disease Risks of Live Export of Cattle and Sheep, with a Focus on Australian Shipments to Asia and the Middle East. Animals.

<sup>3</sup> Nielsen, S et al (2022). European Food Safety Authority Panel. *Welfare of small ruminants during transport*. EFSA Journal.

<sup>4</sup> Stockman B (2006) The Physiological and Behavioural Responses of Sheep Exposed to Heat Load within Intensive Sheep Industries.

<sup>5</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.

<sup>6</sup> Thornton P, Nelson G, Mayberry D and Herrero M. (2021). Increases in extreme heat stress in domesticated livestock species during the twenty-first century. *Global Change Biology*, vol. 27.

<sup>7</sup> Phillips CJC (2022) Zoonotic Disease Risks of Live Export of Cattle and Sheep, with a Focus on Australian Shipments to Asia and the Middle East. Animals.

<sup>8</sup> Wemelsfelder F and Farish M 2004. Qualitative categories for the interpretation of sheep welfare: a review. *Animal Welfare* 13: 261–268.

<sup>9</sup> Hemsworth PH, Rice M, Borg S, Edwards LE, Ponnampalam EN and Coleman GJ 2019. Relationships between handling, behaviour and stress in lambs at abattoirs. *Animal* 13: 1287–1296.

<sup>10</sup> Colitti K, Mitchell M, Langford F. Sheep fatigue during transport: Lost in translation? *Anim Welf*. 2024 Mar 11;33:e13.

ample evidence that shows transport is stressful for sheep<sup>11</sup>, including under conditions that are considered “best practice”.<sup>12</sup> The paper highlights that “any condition or combination of conditions that imposes a coping burden on the animal will use up the animal’s energy, leaving less energy available to stave off fatigue which ultimately lessens the animal’s welfare”.<sup>13</sup> Fatigue from the cumulative stress of transport increases the risk of sheep in the trade becoming immunocompromised, especially given the unhygienic conditions that live trade confines them to.<sup>14</sup>

## Infection and disease

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Conditions on live sheep export vessels are unhygienic. Sheep decks cannot be adequately cleaned or hosed down, therefore, sheep are confined to on board pens that gradually build-up a “faecal pad.” Hot and humid climatic conditions cause the pad to become wet and sticky which emanates ammonia and sullies the sheep’s fleece. Common illnesses and health conditions experienced by sheep on board live export vessels include lameness, injury, gastrointestinal disease pneumonia, scabby mouth and pink eye. RSPCA’s analysis of IO reports found that infection and disease were commonly reported on, indicating that these issues are prevalent. Infection and disease compromise sheep welfare and given the lack of adequate veterinary care on board vessels (that is, only 1 vet for consignments as small as thousands and as large as tens of thousands of sheep) are deeply concerning. Due to the health and welfare risks for sheep onboard live export vessels, it is imperative for Australian Accredited Veterinarians (AAV) to be onboard all voyages to the Middle East during the phase out period and up until 1 May 2028.

## Prolonged space restrictions

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Animal welfare science indicates that sheep find space restrictions aversive<sup>15</sup> and require more energy to tolerate the high stocking densities<sup>16</sup>. High stocking densities are inherent to live export with multiple periods of transport required across the journey including transport by road and sea. High stocking density has also been found to cause behavioural and physiological signs of stress in sheep including reduced rest and rumination, and aggression.<sup>17 18 19</sup>

## Morbidity and mortality

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Industry continues to declare that the live trade’s sheep welfare issues have been addressed because there has been a reduction in sheep mortality rates on live export voyages. However, mortality rates are widely considered a blunt measure of animal welfare outcomes. Rather, mortality rates are indicative of extremely poor welfare in the sheep population. Just because the sheep do not die does not mean they have not suffered extensively. Illness, injury, infection, disease and pain all lead to poor animal welfare outcomes for sheep.

## Fully conscious slaughter

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The animal welfare issues inherent to the live export supply chain are cumulative, with long journeys compromising sheep welfare at every stage, and ending in fully conscious slaughter at Middle Eastern destinations. Slaughtering sheep while they are conscious is prevalent in the Middle East, however this practice conflicts with Australian laws, standards and community expectations.

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<sup>11</sup> Cockram MS, Kent JE, Goddard PJ, Waran NK, McGilp IM, Jackson RE, Muwanga GM and Prytherch S 1996. Effect of space allowance during transport on the behavioural and physiological responses of lambs during and after transport. *Animal Science* 62: 461–477.

<sup>12</sup> Pulido MA, Mariezcurrena-Berasain MA, Sepúlveda W, Rayas-Amor AA, Salem AZ and Miranda-de la Lama GC 2018. Hauliers’ perceptions and attitudes towards farm animal welfare could influence the operational and logistics practices in sheep transport. *Journal of Veterinary Behaviour* 23: 25–32.

<sup>13</sup> Cockram MS 2007. Criteria and potential reasons for maximum journey times for farm animals destined for slaughter. *Applied Animal Behaviour Science* 106: 234–243.

<sup>14</sup> Phillips CJC (2022) Zoonotic Disease Risks of Live Export of Cattle and Sheep, with a Focus on Australian Shipments to Asia and the Middle East. *Animals*.

<sup>15</sup> Navarro G, Col R and Phillips CJC 2018. Effects of space allowance and simulated sea transport motion on behavioural and physiological responses of sheep. *Applied Animal Behaviour Science* 208: 40–48.

<sup>16</sup> Akin PD, Yilmaz A and Ekiz B 2018. Effects of stocking density on stress responses and meat quality characteristics of lambs transported for 45 minutes or 3 hours. *Small Ruminant Research* 169: 134–139.

<sup>17</sup> Cockram MS, Baxter EM, Smith LA, Bell S, Howard CM, Prescott RJ and Mitchell MA 2004. Effect of driver behaviour, driving events and road type on the stability and resting behaviour of sheep in transit. *Animal Science* 79: 165–176.

<sup>18</sup> Jørgensen GHM, Andersen IL, Berg S and Bøe KE 2009. Feeding, resting and social behaviour in ewes housed in two different group sizes. *Applied Animal Behaviour Science* 116: 198–203. 10.1016/j.applanim.2008.08.014

<sup>19</sup> Nielsen BL, Dybkjær L and Herskin MS 2011. Road transport of farm animals: effects of journey duration on animal welfare. *Animal* 5: 415–427.

# Regulatory limitations

Despite multiple regulatory changes and attempts to improve sheep welfare in live export, no amount of regulation can adequately address existing sheep welfare issues. Where there are opportunities to improve animal welfare to a standard that can ensure good animal welfare outcomes, the RSPCA works with regulators, industry and Australian farmers to facilitate incremental improvements via the development of improved standards and guidelines, legislative change, and pathways to higher welfare. However, the animal welfare issues of live sheep export are inherent to the trade. Regulatory attempts cannot raise standards to an acceptable level and industry consistently pushes back against regulation.

## Australian legislation

The slaughter of production animals is strictly regulated in Australia. Animals must first be rendered insensible, which occurs via a process of “stunning” to ensure the animal is unconscious. The most prevalent slaughter methods for sheep in Australia are electrical stunning and captive bolt stunning. After stunning the sheep’s throat is cut with a very sharp knife to cause death, before they can regain consciousness. Pre-slaughter stunning ensures the pain and suffering associated with death are not experienced by the animal. However, Australian laws cannot take effect in other countries and the prevalent method of slaughter in the Middle East is unstunned slaughter. Neither the Australian Government nor the regulator have jurisdictional power to require otherwise. Rather, the exporting company remains responsible for sheep welfare under the Exporter Supply Chain Assurance System (ESCAS).

## Export Supply Chain Assurance System

Despite the existence of ESCAS, there are many examples that demonstrate the lack of control that the Australian Government has over animal welfare outcomes in overseas jurisdictions. As recently as May 2023, Australian sheep were allegedly sold outside the ESCAS with evidence documenting sheep being stuffed into cars, dragged by their limbs, bound by their legs and open mouth panting in temperatures exceeding 40 degrees, and being killed while fully conscious on concrete slabs. Despite evidence of these issues being provided to the regulator ahead of the Festival of Sacrifice, neither it nor the exporters were able to recall those sheep and save them from brutal cruelty, and the matter remains under investigation.<sup>20</sup> ESCAS breaches occur frequently, and extensive evidence gathered over the past few decades shows inhumane slaughter and handling practices in importing countries that are contrary to Australian laws and standards. Between 2012 and 2023 there have been 80 reported ESCAS breaches involving sheep.<sup>21</sup> However, it is not known how many go unreported.

## Northern Hemisphere Summer prohibition

As recently as April 2024, industry has continued to push to reduce Australia’s Northern Hemisphere Summer (NHS) prohibition period on the export of live sheep to the Middle East by sea<sup>22</sup>. While the prohibition has improved the survival of sheep on board live export vessels over time, it fails to adequately address the risk of sheep experiencing heat stress when they cross the equator or at other areas of high heat and humidity. It is not possible for the NHS prohibition to mitigate the risk of heat stress because sheep cannot tolerate extreme changes in temperature and humidity (as discussed on page 5).

As Australian sheep are farmed in the Southern parts of the country, the extreme changes in temperature and lack of acclimatisation is an additional stress factor for Australian sheep, that sheep farmed in the Northern Hemisphere and nearer to the Middle East are not subjected to.

## Australian Standards for the Export of Livestock

While the ASEL aims to provide a set of minimum animal health and welfare conditions that exporters should adhere to in the live sheep trade, the standards are deficient in protecting sheep welfare. The RSPCA recommends that the full review of the standards should be brought forward from its current schedule of 2026 to occur in 2024-25 to tighten-up multiple deficiencies.

<sup>20</sup> Australian Department of Agriculture, Fisheries and Forestry (2023) website – [Statement on allegations on non-compliance with the ESCAS in Oman](#), accessed 01 June 2024.

<sup>21</sup> Australian Department of Agriculture, Fisheries and Forestry (2024) website – [‘ESCAS investigations’ page](#), accessed 01 June 2024.

<sup>22</sup> Ford, O (2024). Countryman. [‘Peak live export body applauds request for 10-day extension to moratorium deadline’](#) 24 April 2024.

There is ample evidence substantiating the deficiencies of the current AESL 3.3.<sup>23</sup> This includes the RSPCA's analysis of IO reports which found that activities inconsistent with the AESL were reported in approximately 70% of journeys. These issues comprised:

- Stocking densities at departure that were greater than the approved load plan and poor loading practices (e.g. reports 238, 57).
- Poor selection of animals including those with pre-existing health issues or injuries (e.g. dog bite wounds, shearing wounds, horns too long making animals unable to reach feed/water) – see reports 31, 219, 213, 218, 200.
- Poor sheep handling either on board or on unloading of the vessel (e.g. report 32, 98, 9).
- Wool length of greater than 25 mm (e.g. report 193, 238).
- Poor management of ill animals on board (e.g. report 211 – unwell sheep hospitalised with otherwise well sheep infected with scabby mouth leading to feed competition, 99 – as reported by the IO “the sick animals would often die without being offered euthanasia”).

Furthermore, the current AESL does not prescribe:

- Adequate stocking density for sheep – the RSPCA continues to recommend a minimum k-value of 0.047 for all animals onboard vessels and/or housed in registered premises to ensure sufficient space for each animal to be able to lie down comfortably and easily access feed and water.
- Ammonia levels – measurement and minimum limit (ASEL 5.1.20 – which is documented in ASEL 3.3 as being delayed until further notice by the regulator).
- Independent Observer presence on all live sheep voyages to the Middle East.
- Individual assessment of sheep – the prevalent method of assessment of sheep across the live export supply chain is mob-based. This inhibits the effectiveness of regulatory conditions such as wool length, body weight and score.
- Contingency plans for births at each stage of the supply chain – contingency plans should be prescribed in the AESL not as part of exporter Operational Plans.
- Maximum time allowed at sea – the need for this is evidenced by the recent MV Bahijah situation (between Jan-Apr) which allowed animals to be in transit within the supply chain for approximately four months. Animal welfare science indicates that extended periods of transport compromise animal welfare outcomes.
- Disallowances for export – disallowances should preclude the export of animals into or through known conflict zones, and any re-export of animals after consecutive periods of loading and unloading in Australia.

## Lack of transparency

There is a disturbing lack of transparency in Australia's live sheep export industry. This spans the lack of access to industry data such as voyage information and industry funded studies into animal welfare in the trade, as well as a lack of procedural transparency on how the severity of reported regulatory breaches are evaluated and enforced. In our experience, industry and the regulator conveniently use privacy and confidentiality to mask what the RSPCA would consider breaches of animal welfare regulations within live trade. This lack of transparency has generated sustained and strong community distrust of the live export industry, and its refusal to adapt or pivot. Hence the need for a legislated end date and fiscal support to incentivise and ensure a definitive transition.

## Insufficient independent observation

Australia's IO program was established in April 2018 to provide community assurance, greater transparency and regulatory oversight. We consider the IO program essential to increase transparency of animal welfare conditions onboard live export vessels and the provision of independent reports for public access. Industry often refers to the program as an example of its transparency. However, the RSPCA's recent analysis on IO reports found that there were no IOs onboard 70% of the live sheep export journeys between April 2018 and May 2023. That is, only 53 of a reported 172 journeys that were carrying live sheep had an IO on board. It is imperative that IOs are present on all live sheep export journeys during the phase out period to provide greater independent oversight and community and regulatory assurance.

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<sup>23</sup> Australian Department of Agriculture, Fisheries and Forestry (2023). [Australian Standards for the Export of Livestock 3.3](#), Canberra, November.

## Lack of animal welfare data

The live sheep export industry lacks transparency. Because the primary sources of data are live exporters and rural research and development corporations (RRDCs), visibility of, and access to, data across the supply chain is severely inhibited. Despite industry's claims of improved animal welfare beyond reduced mortality rates, no evidence has been provided to substantiate this. Exporters may very well be able to measure a sheep's panting score on export vessels, which denotes the animal's respiratory rate and provides an indicator of heat stress, yet there is little that can be done to relieve the animal of that condition. This was highlighted in the final report by the Heat Stress Risk Assessment Technical Reference Panel in 2019 - "once a loaded ship is en route and meets conditions where the ambient WBT exceeds the threshold at which mortality increases, apart from changing route to seek cooler conditions, there is relatively little that can be done to alleviate heat stress to the sheep on board."<sup>24</sup>

A recent example of industry's chronic lack of transparency is demonstrated by the selective information that it chooses to disclose. The RSPCA recently received access to IO video footage after six years of advocating for access and following a Freedom of Information (FOI) request we made in 2019. A visual comparison of the footage that the Australian Livestock Exporters' Council (ALEC) promoted on its social media, with the footage exposed by the IO video from onboard the vessel demonstrates a deliberate promotion of the more "sanitised" version of available footage from the journey. The table below depicts two comparative examples and a significant difference in what industry chooses to publicly share and what they do not. (Video footage can be provided to the Committee on request.)

**Table 1** – Visual comparison of footage promoted by ALEC vs IO footage later in a live sheep export journey

From video posted on ALEC's Facebook post on 28/05/18 (video timestamp 0:51)	From IO video of the same voyage 8 days later - 03/06/18 (day 18 MVI_3370 0:00:36 – 0:00:53)
	
Left: ALEC chooses to post footage of clean sheep on a dry faecal pad, which contrasts with the IO footage (Right) showing sheep panting; wet and sticky faecal pad; and sheep with fleece sullied from sticky manure.	
From video posted on ALEC's Facebook post on 28/05/18 (timestamp on video 0:44)	From IO video of the same voyage 9 days later - 04/06/18 (day 19 MVI_3567 0:00:43)
	
Left: ALEC chooses to share footage on its social media depicting a clean deck on the journey which provides a stark contrast to the IO footage later in the journey (Right) depicting faeces overflowing from pens and dead sheep in the aisle. <sup>25</sup>	

Sheep welfare risks will likely become even more prevalent during the phase out period as the market rescinds. Therefore, the RSPCA recommends that additional technology such as CCTV and devices to measure crucial outputs onboard such as ammonia levels and the WBT on all decks should be implemented by exporters, and reported to the regulator, during the phase out period. Greater transparency would assist in mitigating non-compliances and further declines in animal welfare standards on board live export vessels.

<sup>24</sup> HSRA Technical Reference Panel 2019, *Final report by the Heat Stress Risk Assessment Technical Reference Panel*, Department of Agriculture and Water Resources, Canberra, May.

<sup>25</sup> Australian Livestock Export Council Facebook page (2018). Footage from the AI Shuwaikh.

## Community sentiment

The Australian community's concern for animal welfare has increased and independent research from 2022 indicates that 98% of Australians consider animal welfare important.<sup>26</sup> Even more recently, a 2023 report found 90% of Australians agree that animal welfare should be protected by the government through legislation.<sup>27</sup> Other research has also found the majority of Australians (80%) support more government action to improve the lives of animals, expect the government to protect animals through effective public policy<sup>28</sup> and the majority see the government as "highly responsible" for animal welfare.<sup>29</sup>

More specifically, community concern about live sheep export has been broad and sustained over many decades. McCrindle found that 78% of Australians support an end to live sheep export if farmers were supported through the transition. The RSPCA has long advocated for a government supported transition to assist sheep farmers and others in the supply chain to pivot operations and successfully adapt to market alternatives. Hence, we support the provisions within the Bill to give legislative effect to the \$107 million allocated in the 2024 Federal Budget.

As stated last month, by the Hon Catherine King MP, Minister for Infrastructure, Transport, Regional Development and Local Government, "the Australian people recognise that there are inherent risks in the export of live sheep by sea. Despite numerous reviews and subsequent reforms, the Australian public continues to hold concerns about sheep welfare..."<sup>30</sup> The RSCPA concurs that the Bill will strengthen sheep welfare to better align Australian export law with community expectations.

## Unequivocal support to end live sheep export

The Australian community's support for an end to live export spans decades and is broad and strong. Sustained community support to end the trade is represented across multiple channels over many years, including by multiple Parliamentary inquiries and independent reports into the trade, several Parliamentary petitions, countless correspondence to Parliamentary representatives, hundreds of public petitions with hundreds of thousands of signatures<sup>31</sup> and countless public rallies. The RSPCA's most recent Parliamentary petition, with nearly 44,000 signatures secured via a two-step process, is one of the largest parliamentary e-petitions for animal welfare in Australian history.

Most recently, independent polling conducted by McCrindle in May 2023 showed community support for a phase out is strong. Despite the significant volume of media coverage in WA 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 survey also 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.

McCrindle's research was based on a representative sample of 800 people from WA targeting quotas to ensure opinions were garnered from both metro and regional residents. The sample of 350 regional WA residents has a margin of error of 6%, with a confidence level of 95%. The sample of 450 metro WA residents has a margin of error of 5%, with a confidence level of 95%. Respondents to this survey were sourced through McCrindle's survey panel partner, Cint. Respondents were aged 18+, residents of WA and best efforts were used to achieve a natural spread across the genders and generations. Respondents' opinions were anonymously collected through an online survey and only raw data results were provided to RSPCA. The research 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.

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. This is consistent with the sustained level of national support. Therefore, it is incumbent on Australia's 47<sup>th</sup> Parliament to respond to community preference and ensure that the government's Bill to phase out live sheep export is passed and the provision for funding the transition is enacted.

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<sup>26</sup> McCrindle (2022) RSPCA Public Perception Report.

<sup>27</sup> BehaviourWorks Australia (2023). The 2023 Animal Welfare Survey. Monash University.

<sup>28</sup> Roy Morgan Research (2022) Attitudes to Animal Welfare.

<sup>29</sup> Futureye (2018) Commodity or Sentient Being? Australia's Shifting Mindset on Farm Animal Welfare.

<sup>30</sup> King, C (2024). Hansard transcript of Second Reading of the Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024. House of Representatives, 30 May 2024.

<sup>31</sup> [Change.org.au petition](https://change.org.au/petition) website, accessed 01 Jun 2024.