

**INQUIRY INTO IMPACT OF THE PHASE-OUT OF
AUSTRALIAN LIVE SHEEP EXPORTS BY SEA ON NEW
SOUTH WALES**

Organisation: RSPCA
Date Received: 20 September 2024

RSPCA Submission

To inform the Portfolio Committee No. 4 – Regional NSW's
**Inquiry into Australia's phase out of live
sheep export by sea**

20 September 2024

Table of Contents

Table of Contents	2
Introduction	3
About the RSPCA.....	3
RSPCA's position	3
Good animal welfare.....	3
Animal welfare impact	4
Morbidity and mortality.....	4
Infection and disease	4
Starvation.....	4
Prolonged space restrictions.....	5
Heat stress	5
Fatigue	5
Fully conscious slaughter	6
Social impact.....	6
Unequivocal community support to end live sheep export.....	6
Economic impact	7
No evidence of NSW reliance on live sheep export	7
Lack of evidence that the phase out will impact NSW	7

Introduction

About the RSPCA

The RSPCA has been advocating for animals across 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, including RSPCA NSW. The RSPCA is supported by millions of Australians, with RSPCA NSW alone having more than 500,000 supporters. The RSPCA rigorously applies contemporary animal welfare science to inform our policies, positions, advocacy, education, and stakeholder engagement. Animal welfare science also underpins our heritage of engaging with industry, governments, non-government organisations and the Australian community to improve animal welfare across the nation.

RSPCA's position

The RSPCA opposes the export of live sheep for immediate slaughter or fattening in favour of a chilled meat trade only. Processing sheep as close to the farmgate as possible is a more humane and sustainable alternative, rather than subjecting them to a risk of extreme suffering and the unacceptably poor welfare outcomes inherent to the trade. We strongly support the phase out of live sheep exports by sea by May 2028, and commend Australia's 47th Parliament for its leadership in passing the legislation.

We appreciate the opportunity to inform the New South Wales (NSW) Parliament's Portfolio Committee No. 4 – Regional NSW on its inquiry on whether the phase out of Australia's live sheep export trade will impact NSW. We lodge this submission jointly, from RSPCA Australia and RSPCA NSW, given the inquiry spans Federal and NSW jurisdictions. Most of this submission responds to item (g) from the inquiry's Terms of Reference regarding the sheep welfare issues relevant to the cessation of live sheep export by sea. It also highlights that the phase out will have a significant net sheep welfare gain and a positive social impact because the majority of NSW residents support the phase out. It also highlights the distinct lack of existing evidence that the phase out will have a direct economic impact on NSW.

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 welfare cannot be achieved in live sheep export. Transport and confinement are two well established stressors for livestock.^{1 2 3} Live export requires a duration and intensity of these stressors which will invariably result in animal suffering. Decades of prolific and ongoing sheep welfare issues have demonstrated the extremely poor sheep welfare outcomes inherent to the trade.⁴ These issues include, but are not limited to: multiple periods of road and sea transport and handling which causes cumulative stress; multiple periods of confinement and exposure to increasing amounts of faeces and excrement over several weeks, which increases the risk of infection and disease; exposure to extreme temperatures and excessive humidity which Australian sheep are not acclimatised to; constant exposure to unfamiliar environments such as poor ventilation, 24 hour artificial lights, engine noise and rough seas which inhibits natural behaviours, positive experiences and quality of life; lack of access to familiar food, and limited space to foster physical and mental health or wellbeing. 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 in most Middle East destinations. The extent of poor welfare cannot be adequately overcome by supply chain adjustments, increased monitoring or legislation. Hence, our support for a mandated end date through legislation.

¹ Bhatt, Ninad & Singh, Nripendra Pratap & Mishra, Arun & Kandpal, Diksha & Thakur, Rajneesh & Jamwal, Shwetambri (2021). A detailed review of transportation stress in livestock and its mitigation techniques. *International Journal of Livestock Research*.

² 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.

³ Noriaki Nakajima, Kazuya Doi, Sae Tamiya, Masato Yayota,

Physiological, immunological, and behavioral responses in cows housed under confinement conditions after grazing, *Livestock Science*, Volume 218, 2018, 44-49.

⁴ RSPCA Australia (2024). [Australia's Live Export Timeline of Tragedy](#) webpage.

Animal welfare impact

Ending live sheep exports by sea will have a significantly positive net impact on sheep welfare in Australia given the number of sheep impacted and the severity of the welfare issues inherent to the trade. This will be particularly so for sheep bred in WA which has been the only jurisdiction that has exported live sheep since 2018. There is a large body of scientific literature highlighting the extremely poor sheep welfare outcomes that result from live export. These are not 'old issues' that have been addressed by supply chain improvements or regulatory changes, rather they continue and are prevalent in the trade today:

Morbidity and mortality

Mortality is not an adequate measure of animal welfare. Rather, mortality rates are indicative of extremely poor welfare in the sheep population. Mortality can be one end point of animal distress or suffering. However, it is not the most meaningful measure of animal welfare. Where a cause of death can be established it is possible to make assumptions about the experience of the animal (and therefore the animal's welfare) prior to death. However, extreme suffering can also occur without death as an endpoint. The prevalence of illness, injury, infection, disease, hunger and pain experienced by sheep in the live export trade are much more instructive as animal welfare assessment measures. These factors cause poor sheep welfare outcomes despite exporters' claims that reduced sheep mortality rates indicate improved welfare outcomes. Moreover, an analysis of Independent Observer (IO) reports between 2018-2023 shows that the prevalence of these conditions is high in sheep transported by sea..⁵

Infection and disease

Conditions on live sheep export vessels are unhygienic. Sheep decks cannot be adequately cleaned and sheep are confined to pens onboard 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. Infection and disease significantly compromise sheep welfare. The most prevalent illnesses and health conditions that sheep experience onboard live export vessels, as reported in recent IO reports, are displayed below:

Common illnesses and health issues on board included:



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 Australia's publicly available IO summary reports published 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.

⁵ RSPCA Australia (2024). [Independent Observer Report Analysis – Live Sheep Export Journeys 2018-2023](#). Report.

Prolonged space restrictions

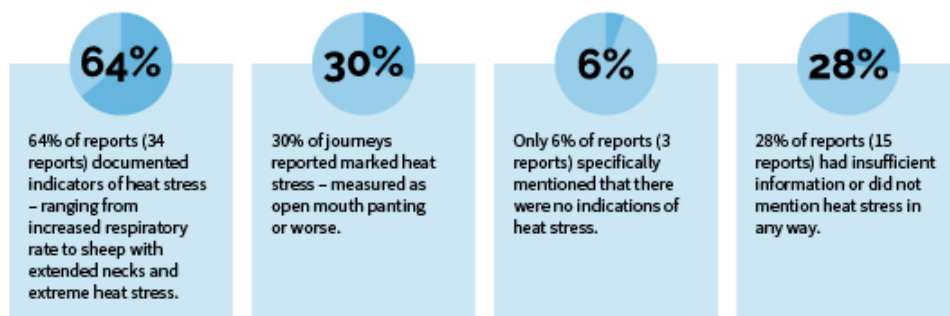
Animal welfare science indicates that sheep find space restrictions aversive⁶ and require more energy to tolerate the high stocking densities⁷. High stocking densities are inherent to live export with multiple periods of transport required across the journey including transport by road and sea. High stocking density has also been found to cause behavioural and physiological signs of stress in sheep including reduced rest and rumination, and aggression.^{8 9 10}

Our analysis of IO summary reports between 2018-2023 showed poor loading practices and incidents where stocking densities at departure were greater than the approved load plan (e.g. reports 238, 57).

Heat stress

Animal welfare science indicates that wethers - the most exported class of sheep from Australia - experience heat stress at wet bulb temperatures (WBT) above 28 degrees.¹¹ 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.¹² 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.¹³ These factors highlight the existing and increasing risks of live export to sheep welfare.

The RSPCA's analysis of recent IO reports highlights concerning, but not surprising, statistics on the prevalence of heat stress with more than 60% of IO reports (32 reports) documenting indicators of heat stress from score 1-4, ranging from increased respiratory rates through to sheep with extended necks and open mouth panting (which denotes sheep's physiological responses to heat stress). 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.¹⁴



Fatigue

There is ample evidence that shows transport is stressful for sheep¹⁵, including under conditions that are considered “best practice”¹⁶. A 2024 study highlights that the impact of cumulative stress, fear and anxiety associated with transport^{17 18} could result in mental fatigue in sheep¹⁹. It highlights that “any condition or combination of conditions

⁶ 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.

⁷ 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.

⁸ 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.

⁹ 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

¹⁰ Nielsen BL, Dybkjær L and Herskin MS 2011. Road transport of farm animals: effects of journey duration on animal welfare. *Animal* 5: 415–427.

¹¹ Stockman B (2006) The Physiological and Behavioural Responses of Sheep Exposed to Heat Load within Intensive Sheep Industries.

¹² 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.

¹³ 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.

¹⁴ 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*.

¹⁵ 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.

¹⁶ 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.

¹⁷ Wemelsfelder F and Farish M 2004. Qualitative categories for the interpretation of sheep welfare: a review. *Animal Welfare* 13: 261–268.

¹⁸ 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.

¹⁹ Colitti K, Mitchell M, Langford F. Sheep fatigue during transport: Lost in translation? *Anim Welf*. 2024 Mar 11;33:e13.

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".²⁰ Fatigue from the cumulative stress of transport increases the risk of sheep in the trade becoming immunocompromised, especially given the unhygienic conditions that live export exposes sheep to.²¹

Fully conscious slaughter

The sheep 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.²² Slaughtering sheep while they are conscious is prevalent in the Middle East, however this practice conflicts with Australian laws, standards and community expectations. Moreover, killing an animal whilst fully conscious causes extreme distress and pain.

Social impact

The RSPCA appreciates the need to support individuals through the phase out. We have long advocated for a government-supported transition for stakeholders within the live sheep export supply chain, and a phase out timeframe that enables adequate time for market adaptation. We previously recommended structural adjustment initiatives from the Federal Government and increased leadership and support from relevant peak bodies to ensure producers and communities directly impacted are well-supported through the transition.²³ Today, we urge the Committee to consider the social impact of the phase out in light of the preferences of the majority of the NSW community who, over many decades, have consistently demonstrated strong support for an end to the trade. Based on community sentiment, Australia's phase out of live sheep export will have a substantially positive impact on the majority of NSW residents and the Australian community at large.

Unequivocal community support to end live sheep export

The long-standing social impacts on the community at having to bear witness to the continued and extreme animal cruelty and suffering caused by Australia's live export trade is difficult to quantify. However, community support for an end to the trade is unequivocally strong. Support for the phase out of live sheep exports is high across Australia regardless of State, Territory, or rurality. Consumer sentiment data, spanning more than a decade from 2009-2023, shows public concern about live export has increased from 49% in 2009 to 76% in 2018.²⁴ ²⁵ ²⁶ ²⁷ Independent research from 2022 found that 77% of people in NSW (and 78% of Australians) support an end to live sheep export.²⁸ Even in WA, the home of Australia's live sheep trade, community support for ending the trade is strong. Polling from 2023 shows that 71% of West Australians also support the phase out, comprising 69% of rural remote residents and 72% of metropolitan residents.

In March 2023, the Australian Government appointed an Independent Panel (the Panel) to consult with stakeholders on how and when the phase out should occur. To help inform its report, the Panel met with more than 2,000 people and received 4,100 submissions and survey responses between March and October 2023. The majority of those submissions and survey responses also supported the phase out. While we are not aware of how many of the submissions were specifically lodged by NSW residents, this is yet another demonstration of the majority support for the phase out of live sheep export.

In June 2024, the Federal House of Representatives' Committee for Agriculture (the Committee) conducted an inquiry into the Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024.²⁹ The results of the public

²⁰ Cockram MS 2007. Criteria and potential reasons for maximum journey times for farm animals destined for slaughter. *Applied Animal Behaviour Science* 106: 234–243.

²¹ 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*.

²² RSPCA Australia (2023). *Through their eyes: the physical and mental toll of live sheep export*. Infographic.

²³ RSPCA Australia (2023). *Submission to the Independent Panel re: Phase out of live sheep exports by sea*. Submission.

²⁴ Ideas Group (2009). RSPCA 2009 Survey Report. (Survey conducted 2009, n=2016).

²⁵ Ideas Group (2013). RSPCA 2012 National Brand Health & Public Perceptions Survey. (Survey conducted 2012, n=1958).

²⁶ McCrindle Research (2015). RSPCA 2015 Brand Awareness and Perception. (Survey conducted 2015, n=2011).

²⁷ McCrindle Research (2019). RSPCA 2018 Public Perception Report. (Survey conducted 2018, n=1810).

²⁸ McCrindle Research (2022). RSPCA Public Perceptions Brand Tracking Report. (Survey conducted 2022, n=1999).

²⁹ Australian Parliament (2024). Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024. *Bills Digest no. 77*.

consultation for that inquiry and the subsequent passing of the legislation, also demonstrate unequivocal support for the phase out from both the community and from most Australia's Parliamentary representatives. More than 85% of the submissions lodged supported the phase out and Export Control Amendment (Ending Live Sheep Exports by Sea) Bill 2024 was passed with multi-partisan support on 1 July 2024.

In addition, there are decades of evidence demonstrating strong and consistent public support to end the trade in NSW and nationally - multiple Parliamentary inquiries and independent reports into the trade, many Parliamentary petitions, countless correspondence to Parliamentary representatives, hundreds of public petitions with hundreds of thousands of signatures.³⁰ and countless public rallies.

Economic impact

Despite the extensive volume of economic analysis on the impact of Australia's live sheep export phase out, none have drawn correlations or conclusions that indicate the phase out will have a direct impact on NSW.

No evidence of NSW reliance on live sheep export

NSW has not exported live sheep nor relied economically on the trade for many years. A recent report by Pegasus Economics highlights that NSW has not been directly involved in the live sheep export trade by sea and that NSW sheep farmers are no longer even indirectly involved as they have been unable to sell their sheep to the live sheep export trade since May 2018.³¹

The NSW Government's website highlights there is no prior recent history nor a foreseeable future in live sheep exports, stating that, "NSW has historically been a net exporter of services with major exports including coal, beef, gold and aluminium,"; that the State "is not directly involved in the bulk live export trade"; and that "there is no export of live animals through NSW sea ports".³² In addition, the NSW Treasury reports that NSW has a diversified, service-driven economy with relatively lower exposure to commodity and soft commodity prices compared to WA.³³ Given Australia's live sheep exports represent only 1% of the total value of Australia's sheep meat and wool exports, and around 0.1% of the total value of Australia's agricultural exports,³⁴ it is highly improbable that the phase out of live sheep exports will have a direct or material impact on NSW.

The RSPCA has a heritage of engaging with key stakeholders to identify shared objectives and promote collaborative change that results in improvements for animals across industries. As part of our long-standing advocacy against live export, we have consulted with numerous stakeholders over the years from primary producers, industry peak bodies, industry analysts, NGOs, and various agribusinesses. We recognise that Australia's phase out of live sheep exports will have an impact on those few remaining producers and operators within the supply chain and involved in the trade in WA. However, there is a distinct lack of evidence that the phase out will have a direct economic impact on NSW.

Moreover, there is no definitive evidence that the WA sheep industry will not successfully continue after the transition. This has been substantiated in multiple economic reports. For example, the Independent Panel's report indicated that the WA sheep industry "can be profitable and sustainable during the transition period and beyond the end of live sheep exports by sea..."³⁵

Lack of evidence that the phase out will impact NSW

The Independent Panel's report provided a thorough analysis including the impacts of the phase out, informed by extensive stakeholder consultation and expert economic advice. However, despite consultation with farmers, farm advocacy groups, animal exporters, economists, animal welfare organisations, researchers, First Nation's People, government organisations, supply chain groups, community organisations, trading partners and the Australian community there was no specific mention of any direct impacts of the phase out on NSW in the Panel's report.

³⁰ [Change.org.au petition](https://change.org.au/petition) website, accessed 01 Jun 2024.

³¹ Pegasus Economics (2024). Submission to the Inquiry on the Impact of the Phase-Out of Australian Live Sheep Exports on New South Wales.

³² NSW Government (2024). [Live export and NSW webpage](#), accessed 18/09/24.

³³ NSW Government Treasury (2024). [About the NSW economy webpage](#), 'International trade' section, accessed 18/09/24.

³⁴ ABARES (2023). [Phase out of live sheep exports by sea: Background information and analysis](#). March 2023, Pp2.

³⁵ Independent Panel Report (2023). [Independent Panel Report: Phase out of live sheep exports by sea](#), October 2023, Pp1.

Conversely, there is ample evidence highlighting the positive impacts of the phase out. Positive impacts anticipated by the Panel, the Federal Department of Agriculture and economic experts include market opportunities, efficiency gains, supply chain value-adds, product diversification and employment in the supply chain. The global demand for Australian sheep meat exports continues to trend upwards in both value and volume.³⁶ and processing sheep domestically is anticipated to contribute significantly more to the Australian economy than live export.³⁷ Sheep will still need to be bred, transported and shorn in Australia, and additional processing of sheep will be required so jobs in the supply chain should continue beyond the phase out. Pegasus Economics has anticipated that an increase in domestic processing would increase total employment due to adjustments increasing wool and prime lamb production.³⁸ with the Federal Department of Agriculture anticipating that increased job opportunities will arise due to the production of prime lambs requiring more labour per sheep than producing sheep for live export.³⁹

³⁶ Independent Panel Report (2023). *Independent Panel Report: Phase out of live sheep exports by sea*, October 2023, Pp34.

³⁷ 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.

³⁸ Davey, A. Fisher, R. Morley, M. (2022) Pegasus Economics report – Economic implications of phasing out the live sheep export trade.

³⁹ 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.