



5 February 2020

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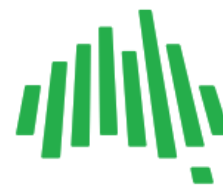
Dear Dr McEwen,

**RE. Live sheep exports to or through the Middle East – Northern Hemisphere summer: draft regulation impact statement**

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the *Live sheep exports to or through the Middle East – Northern Hemisphere summer: draft regulation impact statement* (RIS).

The NFF was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The live sheep export trade makes a significant contribution to regional Australia and is particularly important for sheep producers in Western Australia, who account for more than 80 per cent of the national trade volume. The NFF supports a sustainable live sheep export industry that continues to deliver benefits to regional Australia and that delivers positive animal welfare outcomes in line with community expectations.



Animal welfare is a key concern for the livestock export industry, and the industry has demonstrated this through continuous improvements to processes to reduce risk during voyages and throughout the supply chain. Since April 2018, live sheep voyage performance has shown significantly improved welfare and mortality outcomes. In combination with industry's self-imposed three-month moratorium, the introduction of allometric stocking densities and other changes to on-board conditions, consistent high performance for voyages have been achieved in the months prior to and following the moratorium. It is important to consider this industry-led performance improvement in determining future regulation of the trade.

The January 2020 Mercado report *Impact of the live sheep export trade's self-imposed moratorium and regulatory changes* found that the three-month moratorium has resulted in significant economic cost to sheep producers and supply chain participants. Given the voyage performance improvements that have been achieved since April 2018, and verified by Independent Observers, it is important that regulatory measures to reduce the risk of heat stress retain some flexibility to account for – and incentivise – ongoing innovation and practice improvements. The NFF supports ongoing research into improving on board conditions and welfare outcomes, noting that such efforts could support a longer shipping window to ports in the Middle East in the future.

The NFF has consulted its member organisations on the proposed regulatory options and agrees with the view of Sheep Producers Australia (SPA) and the Australian Livestock Exporters' Council (ALEC) that option two (*prohibition from 1 June to 14 September to all ports, with additional prohibited periods for Qatar and Oman*) is the best regulatory approach, subject to several amendments. More detailed information is available in the ALEC and SPA submissions, but amendments to option two should include:

- Retain existing fleece length limit of 25mm. There does not appear to be a scientific basis for reducing the length limit to 15mm, and such a reduction could in fact lead to adverse welfare outcomes and create additional logistical challenges and costs. These issues are outlined in the SPA and ALEC submissions, and include difficulty in sourcing sufficient numbers of sheep that are recently off shears, coordinating shearing within the restrictions of Registered Premises and increased likelihood of recent shearing cuts and nicks leading to wound infections during voyages.
- Remove the single discharge port requirement for voyages arriving after 1 June and departing between 15 and 30 September. The NFF understands that this requirement could compromise trade opportunities and that there is no compelling evidence that removing the ability to discharge stock at multiple ports would achieve improved welfare outcomes.

It should be noted that many shipments to the Middle East are co-loaded with cattle and other livestock, and that changes to regulation of the live sheep export trade may have



implications for other livestock producers. It is not clear whether impacts on the cattle industry or other livestock industries will be considered as part of the RIS process.

The maintenance of a viable and sustainable live sheep export trade is important to many Australian producers, supply chain participants and regional communities. The NFF acknowledges the work that the department has done to improve the regulation of the live sheep export trade, seeking to improve animal welfare outcomes by reducing the risk of heat stress in a manner that enables a sustainable trade into the future. It is important that regulation of the trade continues to be informed by up to date scientific advice, and that regulation is developed in consultation with industry to ensure it is practical and efficient.

The NFF thanks the department for the opportunity to comment on the draft RIS. Should you require any further information in relation to this submission please contact Adrienne Ryan, General Manager Rural Affairs, on 02 6269 5666 or [aryan@nff.org.au](mailto:aryan@nff.org.au).

Yours sincerely,

**TONY MAHAR**  
Chief Executive Office