

22 July 2019



Department of Agriculture
Live Export Division
GPO Box 858
CANBERRA ACT 2601

To whom it may concern,

Re: Proposed conditions for live sheep exports to the Middle East during September and October 2019

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission on the options paper *Proposed conditions for live sheep exports to the Middle East during September and October 2019*.

The NFF is 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 across the breadth and the length of the supply chain, including live export.

The NFF supports the continuation of a sustainable live sheep export industry that is accountable and delivers positive animal welfare outcomes. The live sheep export trade is critical to many Australian farmers and regional communities and makes a significant contribution to the broader Australian economy (more than \$250 million in 2016-17). Australia is a leader in the global live export industry as the only country that demands welfare is monitored and protected through the whole supply chain.

Since 2018 significant improvements have been made to the live sheep export trade to the Middle East, resulting in greater transparency, better oversight and improved animal welfare outcomes. Industry has shown leadership and willingness to change; exemplified by the industry-led moratorium on shipments during the three hottest months of the Northern Hemisphere summer.

Since 1 May 2019 exporters have implemented reduced stocking densities, as required by the recent review of the Australian Standards for the Export of Livestock. The NFF understands that shipments to the Middle East in May 2019, using the new stocking densities, new monitoring requirements and a lower reportable mortality level of 1%, recorded excellent animal welfare outcomes. The options the department has presented for September/October 2019 don't appear to consider the impact of reduced stocking densities or the data collected during May 2019 voyages. This is a significant concern.

The NFF has consulted its member organisations on the proposed conditions, and supports the alternative option put forward in the submissions made by Sheep Producers Australia (SPA)

and the Australian Livestock Exporters' Council (ALEC). Like SPA and ALEC, the NFF appreciates that the department has recognised the different conditions in the Red Sea and Persian Gulf regions in the options presented. The alternative option proposed by ALEC and SPA and supported by NFF also recognises this distinction, recommending that the regulator:

1. Reaffirm the industry led moratorium for sheep exported to **Red Sea destinations** for June, July and August, allowing vessels to depart Australia from 1 September.
2. Revise the industry led moratorium to prohibit the departure of vessels exporting sheep to **Persian Gulf destinations** until 15 September.

This recommendation is informed by a detailed analysis of temperature data undertaken by LiveCorp, and would minimise the disruption to producers, exporters and customers without compromising animal welfare. The NFF notes that in its submission ALEC has also recommended additional conditions for sheep exported from Australia in September 2019. The NFF supports ALEC's recommendations, which are targeted to ensure sheep sourced for export in September 2019 are appropriately acclimatised and meet age and weight requirements that will significantly mitigate the risk of heat stress.

It is imperative that industry has certainty about the future of the trade, and is given adequate notice of any changes. Regulatory change should be science-based and take account of on-ground conditions and flow-through impacts. Many sheep producers in Western Australia have been relying on the resumption of the live export trade on 1 September to reduce stock numbers on their properties, as feed is limited due to ongoing dry conditions. There are also concerns about the price impacts of channelling an expected additional 140,000 sheep through domestic markets in September, and the capacity of domestic processors to handle these animals. These issues are canvassed in more detail in the SPA submission.

Thank you again for the opportunity to provide a submission to this process. The NFF would be happy to discuss this matter further.

Yours sincerely,



TONY MAHAR
Chief Executive Officer