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Department of Agriculture, Water & the Environment
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To whom it may concern,

Draft Report: Review of live sheep exports by sea to, or through, the Middle East during the Northern Hemisphere summer

I am writing to support the continuation and extension of existing controls over live sheep exports by sea.

The Australian community has seen over and over again the catastrophic animal welfare failures of the live sheep export trade. Those terrible incidents have occurred through gross and chronic industry failures, and through repeated regulatory failures, enabled to some degree by a Coalition government that has been unconscionably blind and weak in relation to obvious industry shortcomings, and yet correspondingly harsh on the animal welfare organisations that have provided scrutiny in the absence of proper government oversight responsibility.

Enough is enough. There is no justification for any weakening of existing protections or regulations. Even with the current settings and claimed improvements, the draft report notes that 60% of voyages involved animals being subject to heat stress. On that basis, with respect to the Review's draft report:

- The recommendation for extended moratorium periods with respect to some destinations is supported.
- The recommendation for shorter moratorium periods in relation to Kuwait and transit through the Red Sea are not supported on the basis of inadequate data, the recent poor record of this industry, and the precautionary principle.
- Recommendation 6 is supported with respect to amending the Animals Rules to require the relative humidity and wet bulb temperatures in at least 2 locations on the bridge of the vessel to be automatically measured and recorded by data loggers every 20 minutes during the voyage.

At the outset, I make the important general point that what should have occurred is a focused inquiry into the terms and details of a managed transition out of the live sheep export trade altogether in favour of an expanded higher-value chilled and frozen meat trade. Such work is long overdue.

With respect to this draft report process, I first note how inappropriate and unhelpful it is to run a public comment period between 17 December – 28 January. This is precisely the time in which the majority of the Australian community can be expected to be on holiday, and so administering a public comment process in this way is daft, less effective, and it unnecessarily promotes public cynicism about the Review and its outcomes. People in my community have asked me whether such an approach is designed to minimise public engagement, and one can easily understand that sentiment.

In relation to the evidence on which the Review is based, I note the observation in the draft report that Independent Observers were not part of the surveyed voyages in two of the three surveyed years, 2020

- Atwell
- Aubin Grove
- Banjup
- Beaconsfield
- Beeliar
- Bibra Lake
- Cockburn Central
- Coogee
- Coolbellup
- East Fremantle
- Fremantle
- Hamilton Hill
- Hammond Park
- Henderson
- Hilton
- Jandakot
- Kardinya
- Lake Coogee
- Munster
- North Coogee
- North Fremantle
- North Lake
- O'Connor
- Palmyra
- Rottneet Island
- Samson
- South Fremantle
- South Lake
- Spearwood
- Success
- Treeby
- Wattleup
- White Gum Valley
- Yangebup



and 2021 – with the exception of one voyage. The draft report states that the quantity and quality of data has been inadequate.

On the specific and crucial issue of wet bulb temperatures (WBT) it is noted: “the quantity of data from the 15 voyages analysed in this review has been found to be incomplete and of variable quality, with bridge data not available for 6 voyages.” I also observe that in recent years animal welfare organisations have continued to face obstruction when it comes to having access to relevant data.

In such circumstances the precautionary principle must apply; any current settings whose purpose is to protect animal welfare should not be relaxed – and, indeed, further protections need to be applied based on the evidence. For example, while the industry has made much of changes to stocking density, recent evidence shows that in certain conditions heat stress will occur irrespective of the space provided for animals: “[...] as discussed in the Regulatory Impact Statement (RIS) finalised in April 2020, the 2018 Middle East Order did not adequately mitigate heat stress risk when ambient temperatures were very hot and humid. If ambient temperatures are very hot and humid, as can occur in June to mid-September in the Middle East, *no amount of additional space will reduce the risk of heat stress.*” [emphasis added]

On the basis of available evidence and in the absence of adequate data, the Review’s draft report essentially concludes that the current moratorium protections should be maintained and extended, stating: “The lack of an adequate amount of quality data has prevented a statistically robust analysis of the impacts of the implementation of a prohibition and related conditions during the Northern Hemisphere summer. Acknowledging these limitations, the current regulatory settings appear to be effective in managing the risk of heat stress in sheep exported to or through, the Middle East during the Northern Hemisphere summer.”

It is absolutely vital to note that where regulatory conditions have been relaxed in the past, animal welfare disasters have ensued. This government in particular should heed the lessons of its own past mistakes. When it previously decided to weaken the protections and oversight implemented by the Labor government (2007-2013), the Awassi Express fiasco and other terrible incidents occurred.

The Australian community has had a gutful of Coalition governments turning a blind eye to animal welfare atrocities and being an apologist for the manifest failures of a small and declining industry with a track record of regulatory failure, non-compliance, and practices that have delivered the broadscale suffering of Australian animals.

Yours sincerely,



Josh Wilson MP
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