

Proposed Conditions for Live Sheep Exports to the Middle East during September and October 2019

WOOLPRODUCERS
AUSTRALIA

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

22 July, 2019

To whom it may concern,

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

WoolProducers Australia (WoolProducers) welcomes the opportunity to provide this submission to the Department of Agriculture on Proposed Conditions for Live Sheep Exports to the Middle East during September and October 2019.

WoolProducers policy regarding live sheep exports is as follows:

'The wool industry continues to support the live export of sheep contingent on adherence to animal welfare standards underpinned by science'.

WoolProducers Australia is the peak industry council for the wool industry. Our membership is comprised of the industry's commercial, superfine and stud breeding sectors. WoolProducers is nationally representative through our State Farming Organisation members and three democratically elected Independent Directors. WoolProducers' policy areas include animal health and welfare, biosecurity, pest management control, natural resource management, drought policy, emergency animal disease outbreak preparedness, and industry development including research and trade.

WoolProducers promotes a sustainable live export industry and supports the consideration of objective data from a range of sources in determining an acceptable path forward for the live sheep trade.

Of the three options presented in the discussion paper, WoolProducers does not have a firm preference but wish to make the following comments:

- Any haste to resume trade must not jeopardise the longevity of the industry and WoolProducers are cognisant of the risks posed, underpinned by the available climatic data, which indicates the average temperature in September is higher than June. The fact that there is a higher risk of a heat stress event must be considered.
- However, there appears to be insufficient scientific evidence to support any changes to the HSRA model in terms of Wet Bulb Temperature thresholds over the September and October shipping period for 2019.
- 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, which is understood to have led to a high standard of animal welfare outcomes.
- WoolProducers are extremely concerned that the options paper prepared by the Department of Agriculture was only made publicly available on 12 July, 2019.
- Producers, particularly in Western Australia, who are reliant on the live export trade as part of their business enterprise, have been gearing up for the trade to resume on 1 September, 2019.

- The fact that less than two months before this date there is now a possibility that this date could be pushed out for another month is not acceptable as it could have a detrimental impact on producer, investor and trade confidence.
- As the Department is fully aware, producers plan the management of their livestock enterprise months in advance and producers have adjusted their flocks early, scanning and marketing dry ewes and export wethers based on the current industry moratorium agreement resuming from 1 September, 2019.
- There are a number of drought affected areas currently in Western Australia, which also happens to be where a significant proportion of WA's sheep flock is raised, therefore the one-month moratorium extension that has been proposed could result in negative on-farm animal welfare outcomes.
- Extending the summer trade ban to the end of September could leave an extra 140k sheep (pre-ban September 5-year average) to be channelled through domestic slaughter channels or held on-farm.
- WA sheep and lamb slaughter is typically 360k in September. Comparing to the October seasonal peak, there may be capacity to kill an additional 60k-100k sheep in September but 140k might not be feasible considering processing infrastructure and capacity.
- There is an average 10% decline in the lamb and sheep markets from August to September and then plateaus in October as seasonal supplies peak. Banning September sheep exports could bring this seasonal market trough forward by a month.
- Staggering the Red Sea route opening earlier than the Arabian Gulf, as proposed in Option 2, may offer some support however the Arabian Gulf remains the primary market at that time of year.

WoolProducers hopes to see resolution of this issue as soon as possible to provide certainty to the live export supply chain.

Thank you for the opportunity to comment on this issue, please do not hesitate to contact WoolProducers to discuss this submission further.

Kind regards



Jo Hall
Chief Executive Officer

