

31st August 2020



Mr Ross Carter
Inspector-General of Live Animal Exports
Department of Agriculture, Water and the Environment
GPO Box 858
Canberra ACT 2601

By email: iglae@agriculture.gov.au

Dear Mr Carter

Submission to the Implementation of Recommendations for the Moss Review

Sheep Producers Australia (SPA) welcomes the opportunity to contribute to the review of the Department of Agriculture, Water and the Environment's (the department), progress in implementing the Moss reviews recommendations.

SPA is the voice on issues that affect Australian sheep production businesses. As the successor entity to Sheepmeat Council of Australia which formed in 1978, SPA is the peak industry organisation for sheep and lamb producers. SPA works daily to enhance the industry's productivity, profitability and sustainability by representing all producers to industry decision-makers and stakeholders.

SPA will not comment on many of recommendations that relate to inter-departmental coordination, or the implementation of industry facing protocols (or personnel) that sheep producers themselves have no visibility or interaction. SPA will make comments where the result of that interaction is apparent to the sheep industry. SPA will also make comments where, as an organisation we are participating in forums that have resulted from the review, or where sheep producers will be impacted from the recommendations themselves, or how they are being implemented.

Recommendation 1: ASEL Review

SPA has been effectively engaged with the ASEL Reviews for both sea and air livestock transportation. SPA has supported clarity in the language used in ASEL, to ensure that there is no confusion in interpretation between industry and the regulator, which allows clear reporting on operations through the entire supply chain.

Recommendation 5; A dynamic and forward-looking posture

SPA agrees that through the RIS process in reviewing the regulation of the trade, there has been an attempt to look forward, with a few to examining how livestock exports can ensure sustainability with the assistance of workable and properly managed regulation.

Following the Moss report, there was an appreciation of evidence-based policy being developed. More recently there seems to have been a shift to an 'over cautious' posture, where industry is not only looking to consolidate but rebuild markets. Where protocols have been negotiated based on the evidence of what is required, there has been a move to keep any regulation in place that has previously existed, even when it is deemed to no longer be relevant.

SPA would encourage the evidence-based approach to continue and the department to be guided by the science and negotiated arrangements with trading partners, with the increased assurance required, provided by the improved monitoring and reporting regimes that are now in place.

Recommendation 6: Incorporating scientific best practice

In line with the comments on Recommendation 5, the same comments and reservations apply to Recommendation 6. The recent case of an application to complete a shipment during the moratorium period (due to a CV19 related issue) illustrated that the department has the ability to evaluate different settings and parameters that are put forward by industry, and assess risk levels based on the science.

SPA appreciates the difficulties in assessing shipment conditions and risk profiles, along with the additional pressure of scrutiny from all interested parties. SPA sees it as essential that the department continues to rely on the science to inform them on what is best practice and navigate the most appropriate way to not only write regulation, but apply the regulation.

Recommendation 8: Recognition of animal welfare groups in identification of ASEL and ESCAS non-compliance

SPA has participated in LEAWAG, and would agree at its inception it could have been an effective forum for the department to gain feedback from all interested parties in live exports. Those views were set against the objective feedback being received from IO's as well as in country reporting.

SPA is concerned at the growing influence of animal activist groups, that have a policy of ending the live export trade. SPA appreciates the concern surrounding animal welfare and agree that sheep should be transported within carefully crafted animal welfare standards. With groups that have a policy that live export must cease, it can lead to calls for parameters to be requested that could never be met, and requests for regulations that add cost, for no improvement in animal welfare outcomes.

LEAWAG has served a short-term purpose. LEAWAG initially assisted in informing the adjustments that needed to be made, and made calls for research that needs to be completed. In the longer term it can become a forum that relies less on objective data and more about debating the polar opposite views of parties interested in the live export trade. For this reason, SPA is concerned about the longer-term practicality of the LEAWAG forum, unless it concentrates on reviewing evidence and research results.

The department notes that the department continues to meet with animal welfare organisations on specific matters as required. SPA agrees that these groups should be consulted, however the data and technical input needs to be supplied to inform any issue, and ensure that evidence is the key driver of decision making, and not any interested party's agenda.

Recommendation 9 and 11: Health and welfare reporting

SPA has noted the reports that have been provided by the Independent Observers. The reports appear both relevant and useful in informing all parties the conditions are occurring on voyages to the Middle East, including any mortality events. SPA has also noted industry's efforts to improve the levels of transparency, which is the only way live exports can continue on a sustainable basis.

SPA is encouraged that the level of reporting on mortalities and the welfare conditions on vessels (as well as the greater supply chain) has improved as a result of the implementation of the recommendations of the Moss review.

Recommendation 16: Full cost -recovery

SPA acknowledges that industry should pay a fair share of the regulatory costs. However, there are consideration to be made in what that means for regional communities. The live export trade is a significant contributor to the income and structure of regional communities, especially in Western Australia. There is a significant level of 'public good' that results from a sustainable live export industry. The multiplier effect from that income into transport, agriculture support businesses and all businesses in the struggling regions, provide multiple levels of taxation in returns to all levels of government.

SPA would advocate that the goal does not need to be full cost recovery, but a measurement of the benefits to the community and non-direct taxation intake should be taken into consideration. SPA notes that this recommendation is 'in progress'. Part of that progress should be an assessment of the indirect returns to

government and the community, and the appropriate reduction in the cost that considers needs to be recovered.

As mentioned previously, there will be continued push from groups, that have the stated objective of ending the live export trade, to impose ever greater levels of regulation that will impose cost on industry with no change in the outcome of the voyages or trade a whole. All regulatory costs need to be continually assessed to ensure regulation is efficient in its operation and only incurring cost where it produces the intended outcome.

Recommendation 21: Cultural change in the department

SPA has appreciated the efforts of the department to complete on site visits and get a first-hand understanding of the live export supply chain. SPA would see further value in on-farm visits to see the levels of preparation sheep producers apply to ensure the lowering of the risks of disease and adaption to being lot fed. This would assist in the decision-making process around further issues that are being raised that are not concentrating on shipboard conditions.

Yours sincerely,



Stephen Crisp
Chief Executive Officer
Sheep Producers Australia