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20.01.2023

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Via: 'Have Your Say' website

### **Proposed Amendments 2022 of the Export Control Rules 2021**

Thank you for this opportunity to contribute to the important discussion and development of the **Proposed Amendments 2022 of the Export Control Rules 2021**.

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. With offices worldwide, including Australia, our vision is a world where humans treat animals with respect, empathy and understanding.

FOUR PAWS is also a core member of the Australian Alliance for Animals, and in addition to our own submission below, we support the Alliance's submission on this issue.

We are deeply concerned about animal welfare tragedies that regularly occur when live animals are exported by sea, and we expect the Australian Government to act on the numerous tragedies recorded.

**We demand a ban on live animal exports and a shift to transporting meat and carcasses instead. We demand a ban of transport at extreme temperatures.**

### **Documented suffering of the animals during transport by sea**

Animals systematically suffer on export ships: sheep and cattle are transported for weeks and even months when being exported by sea. The past decades have shown that it is not possible to ensure animal welfare during transport by sea. Animals systematically suffer during sea transport and many of them die before reaching the final port.

In a report (1) on global live animal exports trade, written by Lynn Simpson, a veterinarian who accompanied 57 live animal exports by sea, the immense suffering of the animals during sea exports is described. The author, who shared her experiences in a speech at the European Committee of Inquiry on Animal Transports (ANIT) in 2021 (2), concludes that it is important to recognise that livestock ships are an inherently stressful and risk-laden environment for animals and even when on-board veterinarians are present, their ability to identify, reach and treat injured or sick animals is limited. The animals are covered with



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faeces so that it is even hard to identify ear tags. The visual evidence of breaching World Organisation for Animal Health (WOAH) standards and food safety outcomes on live export ships are identified as being regularly and found to be unacceptable.

The author summarises the main animal welfare problems:

- Health issues, including and not limited to, disease spread, injuries from infrastructure and general unnecessary pain, stress and suffering from being transported for lengthy periods of time,
- Contagious diseases most commonly seen are pneumonia (“shipping fever”), Salmonellosis, and Moraxella Bovis (“Pinkeye”), caused by crowding, poor hygiene and forced ventilation; often resulting in deaths,
- The ‘five freedoms’ are often challenged due to the management, infrastructure and inherent risks of shipping which include mechanical breakdowns; such as ventilation, fodder or water delivery failure and heavy seas injuring animals as they get thrown around in their confined holding areas into solid walls and railings.
- Poor adaptation to on-board rations; heat stress from poor acclimatisation during long distance transit and seasonal weather changes also kills many animals at sea every year. Disease spread from poor hygiene and loading densities exacerbates these challenges and an animal’s immune system’s ability to counter their effects.
- Injuries are regularly suffered, such as broken limbs and septicaemia from sustained leg abrasions
- from harsh flooring and insufficient bedding. These injuries often require the affected animals to be euthanised due to the extent and unavoidable nature of the injuries in this artificial environment. The bodies are then thrown into the ocean.

According to the above-mentioned report, in the Australian live export trade alone, over 200,000 animals had died enroute to destinations since mortality records have been kept.

The author concludes: “As an animal health professional who served on some 57 livestock shipments, the only conclusion that could be reached is that live export should be reformed significantly or replaced by a carcass only trade between countries. This conclusion takes into account not only the animal welfare implications, but the human health risks posed by drug residues and the consumption of meat products produced in a stressful and contaminated environment.”

### **Impossibility to ensure animal welfare during transport by sea**

Tens of thousands of animals – be it cattle or sheep - are loaded on vessels on multiple levels, making it impossible to care for single animals in case of injuries or if animals fall ill or need to be accessed due to other circumstances. Vessels cannot be mucked out.

Unpredictable situations before and after entering the vessel - like storms or harsh weather conditions at sea - lead to long waiting hours and life-threatening situations for the animals.



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Once on the vessel, in case of an emergency there is no chance to unload the animals and care for them. In case the importing country refuses the consignment, this can have severe consequences.

In 2021 this became apparent at the tragedy of the vessels “Karim Allah” and “Elbeik” that were destined to send 2600 young bulls to the middle east. The animals were stranded at sea for months – with reports the vessel was lacking feed or water – with over one hundred animals dying on board, and the rest ended up being “emergency killed”. Animals that die during sea transport, are routinely thrown overboard. The climatic conditions are harsh, and there is no sufficient ventilation: in some areas there is a total lack of airflow, resulting in high ammonia levels on vessels; some cattle go blind by the time they arrive at the destination (3). Further, the recirculation of exhaust air is a serious issue on livestock vessels.

Animals that are transported by sea are trapped on the ship, even when conditions worsen. Even when “only” exported in Australian wintertime, the sheep still suffer from extreme heat, because they are being sent to the Middle east summer. For example, footage taken between May and October 2017 aired on Channel Nine’s 60 Minutes program on 8<sup>th</sup> of April 2018 showed that thousands of sheep that were sent from Adelaide winter to the Middle East summer died from extreme heat stress, reported as “cooked alive”, on deck of the ship (4,5,6). Tragedies like this, in addition to rejections from destination countries or capsizing ships, happen regularly as different cases show (7,8).

**Example 1:** In Nov 2019, the cargo ship Queen Hind capsized with 14,000 sheep on board (9). Together with its partner organisation ARCA, FOUR PAWS was able to save 180 of the 14,000 animals. The other sheep died within days (suffocated, drowned). No vet euthanised them.

Recent findings suggest that the ship was overloaded. Here is footage material of the sheep rescue: <https://www.youtube.com/watch?v=IkR-RzbtOKw> and <https://www.youtube.com/watch?v=byWv9zd6Aik>

**Example 2:** Summer 2019: 70,000 sheep transported for weeks on vessel in the Persian Gulf, exposed to heat up to 47 °C on deck. Hundreds of sheep died (10).

**Example 3:** Sept 2020: Gulf livestock vessel carrying about 6,000 cattle and 43 crew members sank – except for two crew members, the crew and all the animals died. (11).

### **Cruel transport and slaughter conditions in the importing countries**

Once the animals leave Australia, reliable controls are not possible. Transport conditions in the importing countries should be in line with the WOAHS standards, but as noted in the



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Animal Welfare Foundation summarised in a report “Long distance transports of cattle” proves this is not the case (12). Handling of the animals has been documented often to be rough, animals systematically suffer from the very long duration under unacceptable conditions: being cramped on a road vehicle for days or on a vessel for weeks without sufficient ventilation, being forced to lie in their excrement. In the importing countries, the climatic conditions are often not suitable for the animals, the feeding basis and water supply are insufficient and basic animal welfare cannot be ensured. Further, the slaughter practices in importing countries are not in line with WOA standards nor are they aligned with Australian animal welfare legislation, resulting in extreme animal suffering due to the slaughter methods. This applies to all animals exported for immediate slaughter and for breeding purposes.

**Slaughter conditions** are cruel, do not follow best practice for animal welfare and most often breach WOA standards. There is no stunning before slaughter, which results in severe violence being used to make the animals defenceless before and when the throat is cut (13). Cruel and callous practices in an attempt to make the animals helpless before the slaughter cut, such as stabbing their eyes and cutting their leg tendons, have been documented regularly and published in veterinary journals (14). The suffering endured before the animal is finally dead lasts up to 30 minutes.

### **A shift to meat instead of live animals is possible and can be of economic benefit**

Exporting live animals via sea has been proven to cause severe animal suffering. Almost all importing countries are already importing meat, showing that alternatives to live transport are viable. A switch to a 100% export of meat and carcasses is achievable.

Switching to alternatives to live animal transport not only reduces animal suffering but can also lead to an increase in jobs and create value add in Australia (15).

Sea export numbers of live sheep export trade, for instance, has been in long term structural decline for decades (dropping from over 6 million sheep in 2002 to 570,000 last year). The majority of sheep and lambs are raised in Western Australia and 60-80% of them are slaughtered locally. 90% of this meat is exported chilled and frozen to over 40 different countries (16).

The economic benefit when shifting to an export of meat instead of live animals has also been concluded in a study, carried out in Romania (17). The author concludes that: “A shift from live animals export to those of refrigerated or frozen meat and meat products and by-products would create jobs in the local economy and provide additional momentum for the accumulation of value-added operations at local level, with a positive effect on Romania’s economy. The various scenarios examined have shown that, in the hypotheses presented, the lower the exports of live animals, ovines and bovines, the more jobs are created.”



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A shift to a trade of meat instead of live animals is also being discussed by the EU. The European Parliament in the context of the Committee of Inquiry on Animal Transports (ANIT) recommends a shift to meat and carcasses instead of live animals (18).

### **Ban of transports at extreme temperatures**

FOUR PAWS demands a ban on transports when external temperatures are forecast on any section of the route more than +25 °C.

Live animal transport is regularly carried out during extreme heat and cold, leading to immense animal suffering. Many animals arrive dead at the final destination due to heat stress, physical collapse, thirst and exhaustion. Ventilation on vehicles is not sufficient to cool down temperatures below the external temperature and on vessels there is usually also no functioning ventilation at all.

When animals are transported on deck during extreme heat, mortality during transport usually rises. To avoid suffering beforehand, external temperature limits are needed to make sure no animals are sent on a journey when it is too cold or hot. EFSA notes in its Scientific Opinions (19) on animal transport that the temperature inside vehicles should not exceed the upper critical temperature (UCT), which is estimated to be 25 °C for cattle, horses and finishing pigs and 22 °C for sows.

Thank you for your consideration and the opportunity to contribute to this important legislation.

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