



**Paul McGreevy**  
Professor

12<sup>th</sup> July 2011

Committee Secretary  
Senate Standing Committees on Rural Affairs and Transport  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Senators

I am writing to provide my opinion, as a **veterinarian with advanced professional standing in animal behaviour and welfare** (please see attached CV), on the issue of live export.

Conditions for animals on-board ship would not be tolerated in an onshore holding yard. For instance, my own peer-reviewed studies (see attached) show that sheep do not lie down properly on a metal mesh such as is used onboard ships.

With inanition rates of 1% being deemed acceptable, the shipping of sheep is inhumane. The obligatory transition from pasture to pelleted rations effectively kills thousands of sheep. A farmer starving his sheep on dry land would be prosecuted for cruelty. Stress is cumulative.

The end does not justify the means.

I understand that the terms of reference for the independent review into Australia's livestock export trade are to examine:

*a) the facilities, treatment, handling and slaughter of livestock, exported from Australia, in the importing country for consistency with the World Organisation for Animal Health (OIE) recommendations and standards set out in Terrestrial Animal Health Code (2010) published by the World Organisation for Animal Health and other relevant standards*

World Organisation of Animal Health (OIE) standards are not acceptable as a benchmark since they are well below Australian standards and do not require upright preslaughter stunning (rendering the animal unconscious to pain) and they do not exclude the roping restraint, tripping and casting of animals that occurs in Indonesia and other importing countries and that causes unacceptable suffering.



Standards must be mandatory and include the requirement that animals are upright and stunned (rendering them unconscious to pain) prior to slaughter.

*b) the adequacy of the Australian Standards for the Export of Livestock (ASEL) as they apply to the preparation and export of all livestock with consideration of responsibilities for compliance and enforcement of the ASEL While the Standards take a “whole of chain approach” covering all aspects of the livestock export trade from planning through to on-board management, many sections of the Standards lie outside the jurisdictional powers of the Australian Government, and could only be enforced under State and Territory legislation.*

No Australian State or Territory government has yet legislated to recognise the ASEL, and, as a result, large sections of the ASEL are effectively unenforceable.

*c) the adequacy and effectiveness of current Australian regulatory arrangements for the live export trade*

When Australian animals leave our shores they have no protection against cruel treatment. Importing countries do not have basic animal welfare legislation/anti-cruelty legislation (or, enforce such legislation) and as such these animals have absolutely no protection once they leave Australia. Any assurance that Australian animals will be protected from cruelty and mistreatment is not guaranteed in legislation and therefore cannot be relied upon. Current regulatory arrangements are totally inadequate.

*d) the types of livestock suitable (weight, age, body condition, breeds) for export as feeder or slaughter animals*

Scientific evidence shows that exporting animals live directly compromises their welfare. No live animals should be exported from Australia as feeder or slaughter animals. The best animal welfare outcome is achieved when the animal is slaughtered humanely as close to their point of production within Australia and under Australian law. That is why the Animal Welfare Advisory Committee of the University of Sydney’s Faculty of Veterinary Science issued the following policy:

**Australian livestock should not be allowed to suffer for the religious beliefs or convenience of consumers nor for the sake of educating abattoir workers. To promote animal welfare and Australian jobs, animals should be humanely transported to and slaughtered at the closest onshore abattoir**



**rather than being transported overseas live. The establishment of additional onshore abattoirs should be prioritized over any attempt to mitigate the hazards that arise whenever animals are exported for slaughter.**

This is the committee's collective view and is not necessarily shared by the entire veterinary Faculty.

*e) the risk management strategies necessary to address the welfare of animals from departure from Australia, up to and including the point of slaughter in the country of destination*

There are risks to animal welfare at each stage of the journey from loading, to transport, at the feedlot, and at slaughter. **Again, stress is cumulative.**

Again, the best animal welfare outcome is achieved when the animal is slaughtered humanely as close to the point of production within Australia and under Australian law.

Yours sincerely,

Prof Paul McGreevy BVSc, PhD, MACVSc (Animal Welfare)

Attached: CV and a peer-reviewed paper on the responses of sheep to metal flooring