VETS AGAINST LIVE EXPORT

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Dear Mr McDonald,

Thank you for your rapid response to VALE's concern regarding lack of shearing for the sheep that were to be re-loaded on the MV *Bahijah* (email 1 Mar 2024). The sheep loaded onto the MV Bahijah on 2-3 March 2024 had not been shorn and numerous sheep had wool that was unequivocally greater than 25mm length. ASEL 3.7.3 states: *Sheep sourced for export must have wool or hair no longer than 25mm in length … unless otherwise provided in a Northern Hemisphere winter sheep shearing management plan approved in writing by the department*. VALE understands that the Department approved an alternative management plan.

It should be evident from the MV *Al Kuwait* Exemption Voyage in June 2020 (IO Summary 219 and accompanying documents), that there is no management plan that can alter heat stress if ambient wet bulb temperatures (WBTs) exceed a sheep's heat stress threshold. The MV *Al Kuwait* was recognised by the Department as having the best ventilation of any export ship (Hazlehurst 2020), the stocking density was low (k value estimated to be 0.047), all sheep had to be <50kg and all sheep had to have wool length <20mm. Despite these measures, the ship recorded significant heat effects (Panting Scores 2 and above) before and after crossing the Equator, well before reaching the northern hemisphere summer (see Days 8-10 in Figure 1 below).

It is inconceivable to any animal welfare scientist that the Department would approve sheep that had already endured an extra-long haul voyage and experienced two episodes of heat-wave conditions in Western Australia (on-board and at feedlot) to another voyage, let alone an extra-long haul voyage. This is an entirely novel experiment for the Department. That the Department should add another experimental variable (non-compliant wool length) using a management plan that already failed to prevent heat stress in shorn sheep on a reportedly superior ship, is inexplicable.

It should be noted that the onboard veterinarian's assessments for the MV *Al Kuwait* were discrepant with that recorded by the independent observer and that the exporter never released the heat logger data for the 50 sheep on the MV *Al Kuwait*. VALE understands there is only an exporter-employed veterinarian and stockperson on board the MV *Bahijah* because the Department considers the voyage too dangerous to deploy an Independent Observer.

VALE wants to know:

1) if sheep with compliant wool length experienced heat stress across the Equator on the best ventilated vessel available (MV *Al Kuwait,* 2020), why would the Department approve non-compliant wool length for this voyage with no precedent?

2) noting that shearing is routinely performed before long-haul voyages despite the associated stress, why did the Department approve long wool length rather than shearing?

3) if the lack of shearing was to reduce stress, then would it not follow that these sheep were not fit to load for a routine voyage let alone an extra-long-haul voyage?

4) with no independent observer on board, what steps were taken to ensure that the Department would receive accurate data about the environmental conditions, animals' health and welfare, heat stress and animal mortalities on this experimental voyage?

In addition, VALE is still waiting for an answer regarding selection of independent veterinarians by the Department (see letter dated 19 Feb 2024).

Yours sincerely

Dr Sue Foster BVSc MVetClinStud FANZCVS
VALE Spokesperson

Figure 1: Excerpt from Independent Observer Report *MV Al Kuwait* Voyage. D = day. PS = panting score. WBT av = average wet bulb temperature.

VOYAGE DAY	%PS WBT	%PS 0	%PS 1	%PS 2	%PS 3	%PS 4	WBT av.
D5		88	12	0	0	0	21 - 27
D8 one day to equator		0.5	75	24	0.5	0	24 - 28
D9- 1 day past equator		0.5	50	47	2	0.5	24 - 29
Day 10		30	50	18	2	0	24 - 29
Day 13 to 2000		0	12	80	6	2	26 - 30
Day 14 to 0500		0	1	84	12	3	27 - 32
Day 15 to 1120		0	20	70	9	1	21 - 32