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David Hazlehurst
Deputy Secretary
Department of Agriculture, Water and the Environment
GPO Box 858
Canberra
ACT 2601

13th June 2020

Re: RETWA Exemption from section 8 of the Northern Summer Order

Dear Mr Hazlehurst,

VALE read with concern and disbelief the Public Statement of Reasons (*The Reasons*) for the RETWA exemption. That the Department has sanctioned projected wet bulb temperatures of above 31 degrees in a location where little diurnal variation occurs is quite extraordinary given the science on heat stress in sheep and its review by the Government's Technical Reference Panel.¹ *The Reasons* make it clear that "financial and ongoing trade impact" are more important to the Department than animal welfare and that the Department is fully aware of the animal welfare implications of this decision.

The Reasons state that "I did not consider that granting an exemption two months after the Northern Summer Order commenced would, in and of itself, undermine public confidence in the regulatory framework, the Department's administration of that framework....." VALE disagrees and believes it does both. It was disingenuous of Minister Littleproud to call the Department an "independent regulator, when it is very clear from the Moss² and Lawler³ reviews in particular, that this is not the case.

¹ See: <https://www.agriculture.gov.au/export/controlled-goods/live-animals/livestock/history/review-northern-summer#release-of-the-final-hsra-report>. Accessed 13 June 2020

² See: <https://www.agriculture.gov.au/animal/welfare/export-trade/independent-review-of-regulation> Accessed 13 June 2020

³ See: <https://www.smh.com.au/politics/federal/beyond-belief-live-export-corruption-inquiry-ends-in-dead-end-20190219-p50yx4.html>. Accessed 13 June 2020

This decision will completely undermine any confidence the Australian public has in both the Australian Government and its Department of Agriculture. The only way the Australian public is likely to accept this decision and have confidence in the Department's ability to oversee this trade is for the Department to appoint an independent observer (IO) for the voyage and to ensure that the IO report and CCTV footage are available to the Australian public.

As such, VALE requests that an IO accompanies this ship and that the IO report is available within 4 weeks of the completion of the voyage. VALE requests that CCTV footage of representative sheep on all decks at both the Equator and through the Straits of Hormuz is also made available to the Australian public.

Yours sincerely

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