#### **SPCA Submission**

8 September 2025

# On The Petition of John Hellström: Do not reverse the ban on the live export of farmed animals by sea



# "Without animal welfare we have no trade – morally or commercially."

- Glen Neal, Live Export New Zealand<sup>1</sup>

## **Executive Summary**

- > SPCA, New Zealand's leading animal welfare organisation, supports the petition of Dr John Hellström ONZM to uphold the ban on live export by sea.
- > Surveys commissioned by SPCA show only 17% of New Zealanders support resuming live export, and just 12% trust the industry. Even among farmers, most back the ban.
- > With 57,357 signatures, Dr Hellström's petition is one of the largest currently before Parliament, underscoring public demand to end live export by sea.
- > Successive reviews, including the 2019 MPI Review and the 2020 Heron Review, confirmed that animal welfare risks are systemic and can't be adequately managed.
- > The industry is already in terminal decline globally. Locally, Labour has committed to reinstating the ban when next in government, deterring long-term investment.
- > Animal welfare standards cannot make live export humane. Long voyages by sea inevitably expose animals to heat stress, lameness, disease, and other serious welfare harms. Citing low mortality rates in order to claim high welfare on-board significantly understates the scale of suffering.
- > MPI has warned that reputational harm from live exports is unavoidable. The value of the trade is negligible compared to the \$59.9b value of New Zealand's wider animal product exports put at risk by the potential damage to our reputation.
- > SPCA urges the Primary Production Select Committee to uphold the ban and support Dr Hellström's petition.

 $<sup>1.\</sup> https://newsroom.co.nz/2024/08/26/live-export-gold-standard-worked-on-by-officials-despite-government-ban/approximation of the control of the control$ 



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#### Introduction

The following submission is made on behalf of The Royal New Zealand Society for the Prevention of Cruelty to Animals (trading as SPCA).

SPCA is the preeminent animal welfare and advocacy organisation in New Zealand. The Society has been in existence for over 150 years with a supporter base representing more than 100,000 New Zealanders across the nation. The organisation includes 28 Animal Welfare Centres across New Zealand and approximately 60 inspectors appointed under the Animal Welfare Act 1999.

SPCA welcomes the opportunity to submit on the consultation for the petition of Dr John Hellström ONZM. SPCA supports this petition and has been proud to promote it to our supporters. Our organisation opposes the live export of any farmed animals by sea.







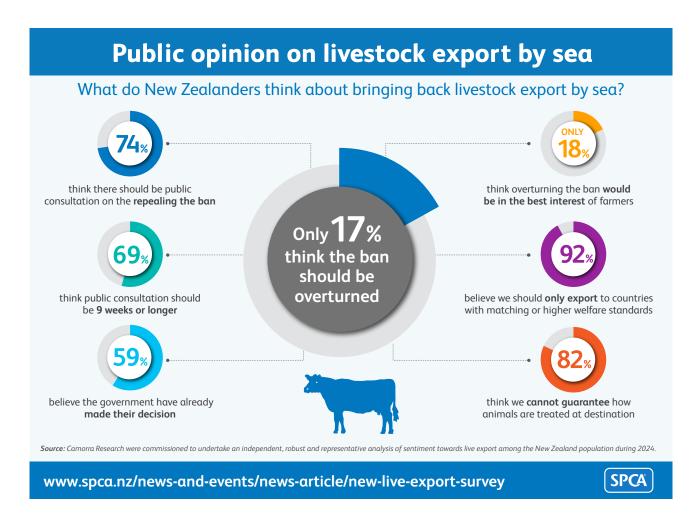




# This industry does not have animal welfare or public trust

Public sentiment in New Zealand strongly opposes the resumption of live export by sea, as evidenced by two nationwide surveys commissioned by SPCA (SPCA, 2024a, 2024b). The surveys reveal that only 17% of respondents support overturning the existing ban, while trust in the live export industry is notably low, with just 12% expressing confidence in its practices.

Even among those directly involved in the farming sector, 56% advocate for maintaining the ban. 83% of respondents doubt the Government's ability to ensure humane treatment of animals at their destination, and 92% oppose exporting to countries with lower welfare standards than New Zealand.



SPCA uses robust, scientific surveys to understand the views of New Zealanders broadly, rather than only those with strong opinions or financial interests in the industry. SPCA is currently working with an independent researcher to prepare a paper for scientific publication using the results of our live export surveys, which further underpins our evidence-based approach. These findings underscore a clear public mandate for upholding the ban, a position further reinforced by the size of the petition in question.











With 57,357 signatures, this petition is listed as the largest currently under consideration according to the Parliament website. This level of support signals that the matter is a priority for the community, and SPCA urges the Primary Production Select Committee to carefully consider the submissions received.

# Live export by sea has been contentious for decades

While some have suggested that New Zealand's world-leading ban on the export of farmed animals by sea was an "overreaction" to the *Gulf Livestock 1* tragedy in September 2020, the decision to end live export by sea was in fact the culmination of decades of mounting evidence and concern. Successive governments had already restricted and tightened the trade, including the 2008 prohibition on slaughter exports (Beehive Press Release, 2007) and the introduction of the Animal Welfare (Export of Livestock for Slaughter) Regulations in 2016 (Ministry for Primary Industries, 2020), because of ongoing welfare risks and reputational harm.

When the *Gulf Livestock 1* was lost, Cabinet had already directed MPI to lead a review of the livestock export trade. That review began in 2019, and the trigger for that review was the export of around 2,000 New Zealand cattle to Sri Lanka.

Despite a programme that partnered with local farmers to provide support, underwritten by the Australian Government to the tune of \$100 million, the cattle were not suited to local conditions, did not produce well, and hundreds of cattle suffered and died, leaving local farmers facing financial ruin: some farmers were reported to be suicidal (NZ Herald, 2019; RNZ/ABC, 2019). Sri Lanka's Auditor-General described the project as "poorly planned and inhumane". The export company described the project as "a success." (RNZ/ABC, 2019).

That incident made clear that welfare risks were not confined to the voyage itself but extended into the destination country, where New Zealand had little or no oversight. This recognition fed directly into the subsequent Heron Review (Michael Heron KC, 2020), which examined whether the regulatory system could ever provide adequate assurance of animal welfare on long sea voyages.

Taken together, these inquiries demonstrated that the risks were systemic and persistent. The eventual ban was not the product of one accident, but of a sustained body of evidence and expert advice. The tragic loss of *the Gulf Livestock 1* accelerated an already well-established policy trajectory: it was not the sole cause for the ban.

SPCA understands that one of the key emerging markets for the live cattle trade is Indonesia (Beef Central, 2025b; Prasad, 2025) - a country incidentally grappling with an outbreak of highly transmissible foot-and-mouth disease, which can survive on surfaces such as contaminated ships for weeks (Mahony, 2025). This poses an unacceptable biosecurity risk to New Zealand's livestock sector and wider economy, as even a single incursion of foot-and-mouth disease could have devastating consequences.











New Zealand's dairy cattle are high-performing and adapted to temperate conditions. SPCA believes that exporting our cattle to a tropical environment risks repeating the welfare failures seen in the Sri Lanka incident, and would expose both the animals and New Zealand's reputation to significant risk.

#### This trade has no long-term future

Globally, there is a growing consensus to end the live export of animals by sea, driven by escalating animal welfare concerns. New Zealand led the way by becoming the first country to implement a full ban in April 2023. Following suit, the United Kingdom enacted a ban for both slaughter and fattening in 2024 (GOV.UK, 2024) and Australia has legislated to phase out live sheep exports by sea by 2028 (Department of Agriculture, Forestry and Fisheries, 2025). Other countries including Brazil, Luxembourg and Germany have also introduced measures to restrict or end live exports by sea. This global shift reflects a collective acknowledgment that transporting live animals over long distances by sea subjects them to inhumane conditions, prompting governments worldwide to review and ultimately end the practice.













Even if the trade is briefly resuscitated, its days are limited. Labour has promised to ban live export by sea next time it is in power, noting that "The world is changing [...] Most New Zealanders do not want this." (Labour Party, 2024). Given the overarching policy direction, potential investors will find the industry increasingly unattractive, as the prospect of future bans and regulatory uncertainties deter long-term planning.

Investment is already declining. In 2024, a coalition of insurance companies including the Fidelis Partnership and Scor pledged to phase out providing insurance coverage for live animal exports over 18 months (Reuters, 2025). Wellard, once Australia's largest live export shipping company, recently announced the sale of its final vessel and its complete withdrawal from the live export industry bringing an end to its 46-year involvement in the global live export industry. This underscores the sector's instability and the increasing global pressure against the trade (The Maritime Executive, 2025).

In addition, SPCA notes that no new ships are currently being built due to market uncertainty (Beef Central, 2025a). Of the 19 ships operating in our region with a current Australian Certificate to Carry Livestock, only 13 are purpose-built, and of those 13, two have been put up for sale in 2025 alone. SPCA recommends that only purpose-built ships of less than 20 years of age should be used by New Zealand, and we have highlighted the remaining ships available in green below.

It is our understanding that these remaining ships are likely to prioritise the established, though declining, Australian live cattle trade over an uncertain New Zealand trade.

#### Livestock Ships Working in Australia with a Current Australian Certificate to Carry Livestock – As at August 2025

Name	Age	Purpose Built?	Notes
Al Messilah	45	Converted	Reliant on sheep trade
Anna Marra	35	Converted	
Bahijah	15	Purpose	Israeli War issues – may not return
Bison Express	30	Purpose	Recently sold
Brahman Express	23	Purpose	
Dareen	31	Converted	
Devon Express	28	Purpose	For sale
Freisian Express	8	Purpose	
Galloway Express	8	Purpose	
Ganado Express	12	Purpose	
Gelbray Express	12	Purpose	
Girolando Express	11	Purpose	
Gloucester Express	9	Purpose	
Greyman Express	9	Purpose	
Gudali Express	9	Purpose	
Jawan	22	Purpose	
Maysora	36	Converted	Reliant on sheep trade
Nine Eagle	19	Converted	
Ocean Swagman	16	Purpose	











# It's not possible to implement animal welfare standards that are high enough while still remaining profitable

The transportation of farmed animals by sea is inherently linked with major animal welfare compromise. Scientific evidence shows that these compromises occur in regard to changes in feed, poor environmental conditions, stocking densities, lameness and leg issues, damaging ammonia concentrations due to a build-up of urine and excrement, disease, noise, motion sickness, changes in lighting pattern and heat stress (Fisher, 2013; Hing et al., 2021; Phillips, 2008). These environmental factors lead to animals feeling fearful, anxious, ill, tired, hungry and in pain.

One anonymous submitter on the live export ban, a veterinarian who worked on board a live export ship, noted that despite the standards in place before the ban, they saw unacceptable compromises to animal welfare. They submitted (Parliament Website, 2021):

"Despite our best efforts to get all the cattle across the equator alive, two cattle died of heat stress on the journey. Although the two cattle written down on our trip report represent a low mortality rate attributable to heat stress, the pain and distress they and the surviving cattle experienced still haunts me."

Mortality rate alone is often cited by supporters of live export as a reason why animal welfare on board and after arrival is acceptable. However, mortality statistics represent the 'tip of the iceberg' in terms of the total impact of the export process on animal welfare (Fleming et al., 2020). SPCA advises that mortality rate is insufficient as an indicator of animal welfare, in any context, because it does not capture the suffering that is experienced by animals. As stated by Dr John Hellstrom ONZM, who has a long history working with the live export industry: "These animals don't have a life worth living. The lucky ones die." (1 News, 2024).

New standards for animal welfare are being presented as the reason that livestock export will be acceptable for New Zealanders. Federated Farmers describes these apparently Government-led standards in their submission on this petition of Dr John Hellström ONZM as "MPI-backed" standards.

While attempting to implement the impossible -  $\alpha$  'gold standard' for livestock export - has certainly been ambitious, SPCA notes that other world-leading cattle trades are already grappling with heavy compliance costs. Compliance now costs Australian farmers \$100  $\alpha$  head for cattle to Indonesia; the number of live cattle businesses serving that market has halved in the last five years. In fact, the industry is already accusing the Government of banning the trade 'by stealth' as regulations inexorably tighten further (Goodwin, 2025).

SPCA is a strong believer in high standards, and we champion improved welfare regulations in many sectors. But this is not one of them. SPCA submits that any standards capable of genuinely providing world-class protection for animals transported by sea would, by necessity, be operationally impractical and financially prohibitive.





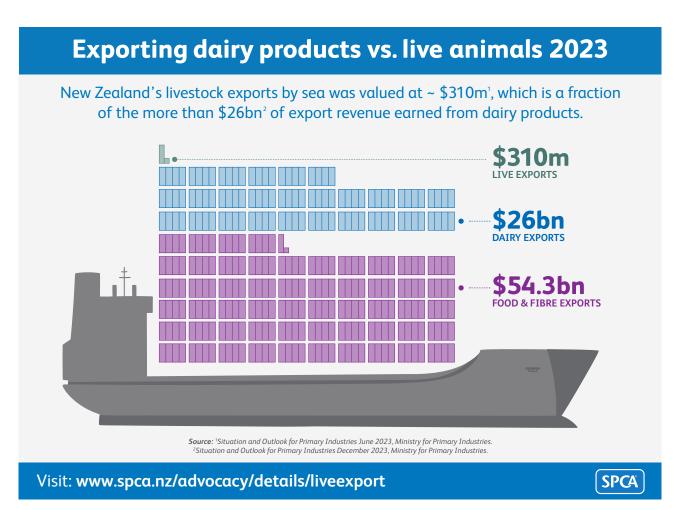






# Reinstating this trade risks New Zealand's trade and reputation

The Ministry for Primary Industries advised in a Regulatory Impact Statement that the reputational risks of livestock export by sea are real, likely to result in ongoing negative reputational impacts, and cannot be eliminated completely. They also noted that the direct value of New Zealand's livestock exports was approximately \$261 million for the year ending December 2020, which was a fraction of the (then) \$56.2 billion of trade in animals and animal products which would be put at risk by restarting the trade (Ministry for Primary Industries, 2021).



Some of our most recent Free Trade Agreements, with the European Union and the United Kingdom, were negotiated on the understanding that New Zealand producers are some of the most sustainable in the world and these credentials resonate well with EU consumers. As we boasted at the time, New Zealand and the EU share similar values and a commitment to high animal welfare standards (Beehive Press Release, 2023).



As Deputy Secretary for Trade Vangelis Vitalis has observed, "Animal welfare measures, environmental standards – these are all the kinds of challenges we are going to have to think about as we look out into the future in terms of that rising protectionism that we are seeing." (Stirling, 2020).

In this context, any move to resume live exports risks undermining the very values New Zealand has promoted as the basis for trade access, eroding both market confidence and our ability to differentiate ourselves globally.

It has been argued that if New Zealand doesn't export live cattle, other countries will do it worse, thereby reducing animal welfare standards globally. With respect, SPCA suggests that this argument is fundamentally flawed. Ethical standards should not be determined by the lowest common denominator, and sending high-performing New Zealand animals into conditions that put their welfare at predictable risk cannot be justified by poorer practices elsewhere. Such reasoning ignores local opposition, exposes New Zealand to reputational harm, and undermines the opportunity for industry to truly lead the way internationally in animal welfare.

The one argument from proponents of the industry that consistently rings true is that some farmers stand to make more money if the live cattle trade returns. But in 2025, when economic optimism among farmers is already at a 10-year high according to Federated Farmers (O'Dwyer, 2025), is this really the time to bring back a marginal, controversial trade for the benefit of a few?

As summarised by Fisher (2013): "It may not be a direct trade-off, but one day farmers may need their political capital and the residual goodwill of the public more than they need the live export industry."

#### **Conclusion**

SPCA appreciates the opportunity to contribute to the petition of Dr John Hellström ONZM. Our organisation is looking forward to participating in oral hearings which are open to the public.











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