

Committee Secretariat
Primary Production Committee
Parliament Buildings
Wellington

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By Email

Submission on behalf of the New Zealand Veterinary Association Te Pae Kīrehe regarding John Hellstrom's petition about the ban on live animal exports by sea

The New Zealand Veterinary Association Te Pae Kīrehe (NZVA) thanks the Primary Production Committee for the opportunity to provide feedback on the petition of John Hellstrom: *Do not reverse the ban on the live export of farmed animals by sea*.

Veterinarians are committed to advancing animal welfare and evidence-based policy. To inform this submission, NZVA surveyed members on their views of live exports by sea. We received 193 responses. While these do not represent the full membership of 4,105 veterinary professionals and students, they demonstrate a clear spectrum of opinion within the profession. This submission reflects the three main groupings of survey respondents:

- those who support live exports
- those who are unsure
- those who do not support live exports.

Context

The Animal Welfare Amendment Act 2022 prohibits the export of cattle, deer, goats, or sheep by sea. The current government has indicated its intention to repeal this prohibition and reintroduce regulated live export. NZVA's position statement opposes the export of any live ruminant by sea unless welfare is adequately safeguarded across the entire lifetime of the animal, in line with the Animal Welfare Act 1999 and the recognition of sentience in law.

Survey results

Members who support live exports

A minority of survey respondents expressed support for continuing live exports by sea. Their views were often informed by direct experience in the industry, with several veterinarians emphasising that welfare risks could be effectively managed with appropriate ships, generous space allowances, good ventilation, adequate feed and water provision, and veterinary oversight.

Decreasing mortality data from the Ministry for Primary Industries (MPI) was cited as evidence that welfare outcomes on voyages have improved since 2020. These respondents placed strong value on the role of veterinarians and trained stockpersons who monitor

animals daily and report on welfare standards throughout voyages. Several respondents cited evidence from the joint MPI and Industry created Critical Improvement Programme that the industry worked with immediately prior to the ban. This programme resulted in improvements in animal health and welfare as evidenced by detailed reporting of appropriate metrics.

In addition to animal management, supporters highlighted the economic and trade benefits of live export, both for farmers and for New Zealand's wider economy. They saw it as a way for the country to contribute to global food security by sharing high-quality genetics.

For some, live export was also viewed as an opportunity to enhance Aotearoa New Zealand's international reputation by demonstrating leadership in high-welfare live animal transport.

Post-arrival welfare standards overseas were not universally seen as inferior; some noted examples of farms abroad that provided conditions as good as or better than those in New Zealand.

While a few members supported live exports under any conditions, many qualified their position by stating that exports should be limited to breeding animals, or that continuation should only occur if the "highest animal welfare standards" could be independently defined and assured.

Members who are unsure

A significant number of respondents did not take a firm stance for or against live exports, but instead expressed uncertainty about whether the practice could ever be made acceptable.

This group acknowledged that there are genuine welfare risks (including heat stress, stocking density, and disease) but felt their severity depended heavily on ship design, voyage duration, season, and the quality of management on board. While they recognised the economic value of live exports, they also questioned whether those benefits outweighed the animal welfare challenges and reputational risks for New Zealand.

A recurring theme in these responses was the distinction between welfare risks during transport (which some believed might be mitigated through veterinary oversight and robust regulation) and the welfare of animals once they arrive in destination countries (which was seen as much more challenging to monitor or assure).

Several respondents indicated that they could accept live exports only under conditions of strict safeguards, independent verification, and enforceability, though most doubted whether such assurances could ever realistically be delivered. Even if voyage standards could be maintained, many remained uneasy about the reputational consequences for New Zealand's global image, with concerns that resuming exports could still be perceived as inconsistent with the country's high animal welfare standards.

Members who do not support live exports

Most respondents opposed the resumption of live exports by sea. Their opposition was grounded in the view that once animals leave New Zealand's jurisdiction, there is no reliable way to ensure their welfare is maintained to acceptable standards. Many noted that World Organisation for Animal Health (WOAH) requirements do not meet the standards expected in Aotearoa New Zealand, and that local enforcement in importing countries is often weak or absent.

This group stressed that animal welfare should be considered across the entire lifetime of the animal, not just during the voyage, and expressed particular concern about the intensive housing, on-selling, and inhumane slaughter practices animals may face overseas.

Voyages themselves were described as inherently stressful, moving animals from pasture-based systems into confinement characterised by noise, vibration, crowding, motion stress, and an inability to display natural behaviours.

Beyond the immediate welfare of animals, opponents raised strong concerns about reputational damage, warning that images of poor welfare abroad would inevitably be linked to New Zealand, undermining the country's standing as a global leader in animal welfare and threatening broader market access.

For many respondents, opposition to live exports was both practical and ethical, with many arguing that the practice is fundamentally inconsistent with the recognition of animals as sentient beings in New Zealand law. A frequently mentioned alternative was the export of semen, embryos, or processed meat products, which respondents considered both more ethical and less damaging to New Zealand's reputation.

Common themes

Views differed among respondents, reflecting the three established orientations to animal welfare:

- biological functioning (health and survival outcomes)
- affective experience (animals' feelings such as heat stress, fear, or fatigue)
- natural living (loss of pasture-based behaviours).

In the scientific literature, the affective orientation is generally regarded as dominant because it integrates functioning and natural living into how animals experience their lives; this perspective underpins NZVA's position.

Despite differences in overall stance, the survey highlighted several common concerns, including:

- significant animal welfare concerns such as heat stress, disease, injuries, and delays at unloading
- post-export welfare standards in importing countries, though respondents interpreted this differently in terms of their severity and manageability
- reputational consequences for New Zealand, with some respondents seeing them as a risk to be avoided and others as an opportunity to demonstrate high standards.

NZVA position statement (ratified in 2024)

There is a range of opinions on the live export of ruminants by sea. The NZVA opposes the export of any live ruminant by sea, unless its welfare is adequately managed according to the requirements of the Animal Welfare Act 1999 and the 2015 Amendment to the Act that recognises animals as sentient. The registered veterinarians responsible for the ruminants' care must comply with the Code of Professional Conduct for Veterinarians. Consideration should be given to the lifetime of the ruminants and, once the ruminants are outside New Zealand jurisdiction, the welfare of the ruminants should meet a minimum of the international standards of the WOA. H.

Explanation

New Zealand has an international reputation for having high standards of animal welfare. Allowing ruminants to be exported to countries where their welfare will not be protected to a similarly high standard undermines this reputation and is unacceptable. The NZVA requires that the welfare of live ruminants exported by sea is managed according to the Animal Welfare Act 1999 and the 2015 Amendment to the Act that recognises animals as sentient.

Any ruminant exported from New Zealand must, throughout its lifetime, experience standards of welfare consistent with those expected if that ruminant had remained in New Zealand. Nevertheless, once outside New Zealand, their welfare must meet the minimum international standards set by the WOA. H, even though these standards may be lower. Under the Animal Welfare (Export of Livestock for Slaughter) Regulations 2016, no cattle, deer, goats, or sheep may be exported for slaughter without the prior approval of the Director-General of the Ministry for Primary Industries (MPI).

Adequate safeguards must be put in place to ensure ruminant welfare is protected throughout the lifetime of any ruminant, including transport and slaughter.

Guidelines

1. Ruminants must not be live exported to countries where formal welfare standards for that species do not meet the expectations of WOA. H.
2. Ruminants must not be live exported to countries where humane slaughter is not required by local law.
3. All export requirements set by the Ministry for Primary industries must be complied with.
4. For any export of livestock by sea, a suitably selected New Zealand or Australian fully registered veterinarian with livestock experience must accompany the livestock for the entire duration of the sea journey to ensure high levels of welfare are maintained at all times.
5. A ruminant being considered for live export must have a veterinary inspection to assess its individual suitability for the proposed journey, and purpose in the destination country.
6. Export requirements should be set appropriately and regularly reviewed to ensure any ruminant exported live from New Zealand has all physical, health, and

behavioural needs managed according to the requirements of the Animal Welfare Act 1999 and the 2015 Amendment to the Act that recognises animals as sentient. Consideration should be given to the lifetime of the ruminant and, once the ruminants are outside New Zealand jurisdiction, the welfare of the ruminants should meet a minimum of the international standards of the WOAH.

Conclusion

Veterinarians contribute scientific knowledge and their professional duty to protect animal welfare to the live export debates. Our survey demonstrates that a minority of respondents support continuation, contingent on strong regulation, while a substantial group remain unsure, recognising risks and benefits but doubting safeguards can be enforced. The majority oppose live exports by sea, viewing them as inherently inconsistent with high welfare standards and damaging to Aotearoa New Zealand's reputation.

Accordingly, NZVA reaffirms its position that live export of ruminants by sea poses welfare risks that cannot be adequately mitigated once animals leave New Zealand's jurisdiction.

Nāku iti noa, nā,



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New Zealand Veterinary Association Te Pae Kīrehe