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SAVA POSITION STATEMENT ON EXPORT OF LIVESTOCK BY SEA FOR SLAUGHTER AT DESTINATION

The South African Veterinary Association (SAVA) is greatly concerned by the severe and unavoidable harmful effects arising from the transport of tens of thousands of live animals, predominantly sheep, from South Africa by sea for the sole purpose of slaughter at international destinations. This statement serves to reinforce SAVA's position on the welfare of the animals exported on board these ships. SAVA recognises animals as sentient beings that experience both positive and negative states and acts to protect and promote animal welfare. SAVA supports the livestock industries that export products. However, the export of livestock-derived produce should not lead to unnecessary and avoidable risks to, and the detriment of, livestock welfare.

Extensive scientific research has been conducted on the experiences of animals on ships for protracted periods, particularly on journeys to the Middle East (see [1–6]). The research consensus is that the welfare of animals at sea is compromised due to multiple factors, including, but not limited to [7]:

1. High animal density (thousands of animals in compact spaces)
2. Thermal discomfort (a multifactorial issue which includes ambient temperature, humidity, and lack of ventilation)
3. Ship motion on the ocean
4. Difficulty accessing feed and water
5. Inappetence or inanition resulting from physical weakness
6. Risk of infectious disease

7. Ammonia levels from waste accumulation
8. Bedding and manure pad management

Inherent harms are those that are a fundamental part of every sea voyage. These include the motion of the vessel on the water, challenges inspecting and caring for vast numbers of animals, and the accumulation of excrement and ammonia. Incidental harms are those which may not necessarily manifest, yet have a significant impact on animal welfare if they do. Incidental harms include changes in the temperature and humidity index (THI)/ wet bulb temperature, insufficient numbers of qualified personnel to properly care for the animals, ship design, hygiene standards and protocols, unequal access to feed and water due to stocking densities and herd social dynamics, and the development of inanition.

While the current measurement most widely used to evaluate animal welfare on these sea voyages is the mortality rate, it is important to note that animals may suffer and have severely compromised welfare long before the point of death. Death of animals at sea is very frequently caused by inanition as a result of accumulated stressors, a fact which has been established as far back as 1989 [5], and is indicative of suffering prior to death.

The Minister of Agriculture released draft regulations under the Animals Protection Act (Act 71 of 1962) for the live export of animals by sea for comment in July 2025. At the time of publication of this statement, the final regulations have yet to be gazetted. Whilst considering implementing regulations governing live export by sea is a laudable move to protect the welfare of animals at sea, it must be noted that the potential impact of these regulations is limited because only incidental harms may possibly be reduced through regulation. While it is possible to stipulate the required number of personnel to care for a certain number of animals, together with a maximum stocking density on board (amongst other factors), this will not prevent innate issues such as the build-up of excrement and the associated risk of infectious disease. It is also important to note the realistic prospect of mechanical failure of things such as ventilation systems, water and feed supply, and the ship itself. It is extremely difficult to regulate and enforce contingency mechanisms beyond South African waters. Shipping livestock by sea from South Africa in middle of the year is particularly problematic because cold-adapted animals are sent from a low temperature

environment to a hot, humid climate. There is no practical way to avoid serious heat stress during these journeys. No amount of regulation is able to prevent the inherent harms associated with live export by sea, e.g., [3], with the resultant suffering experienced by the animals on board.

Additionally, South African regulations do not have jurisdiction in international waters, and thus there is no way to ensure that any minimum standards required by our regulations will be enforced once vessels leave South African territorial waters. There are the other challenges in terms of sourcing and funding independent monitors, accessing journey records, and consequences for non-compliance by the exporters. Countries such as Australia and New Zealand, which have sophisticated animal welfare legislation and strict regulatory requirements regarding exporting livestock by sea, have banned this practice, either fully or in part, because it is not possible to enforce regulations, as well as confirming that regulations do not address the underlying issues inherently deleterious to animal welfare.

Animal welfare needs to be considered for the entirety of the animal's life. South Africa lacks jurisdiction over the manner in which animals are slaughtered at their destination and cannot regulate this process. Regulations protecting animal welfare, or the enforcement thereof, may be minimal, leaving animals to an uncertain and potentially inhumane fate.

Therefore, SAVA does not support live export of animals by sea for the purpose of slaughter upon arrival when humane alternatives are available. SAVA supports the development of South African abattoirs which are internationally accredited to perform Halaal slaughter (or any other specialised form of slaughter). By slaughtering livestock in South Africa with all the requirements of an export abattoir and all other religious requirements of the importing countries, risks and harms to our livestock can be minimised and their welfare protected. Construction and staffing of such abattoir facilities will additionally contribute to job creation and stimulate local economies in many South African communities, whilst also ensuring that regulations protecting animal welfare at the point of slaughter can be monitored and enforced.

SAVA supports South Africa's livestock industry and will work together with industry to encourage economic growth and development whilst protecting the interests of animals.



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