

# Do not reverse the ban on the live export of farmed animals by sea

Submission of SAFE on the petition of John Hellström

To: Primary Production Select Committee  
8 September 2025



SAFE wishes to be heard in support of this submission.

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## About Safe

SAFE (Save Animals from Exploitation) is New Zealand's leading animal rights organisation. Our goal is to inspire institutional, political, and societal shifts that reduce animals' suffering, improve their lives, and ultimately, end their exploitation. SAFE represents the views of tens of thousands of New Zealanders who support stronger protections for animals.

This submission is made in support of the petition of John Hellström ONZM, signed by 57,357 people and supported jointly by Animals Aotearoa, End Live Exports NZ, Helping You Help Animals (HUHA), SAFE, SPCA, Veterinarians for Animal Welfare Aotearoa (VAWA), and World Animal Protection.



## 1. Recommendations

SAFE recommends that the Primary Production Select Committee:

**1.1 Support maintaining the *Animal Welfare Amendment Act 2022*, which prohibited the live export of cattle, sheep, deer, and goats by sea from 30 April 2023.**

**1.2 Recommend to Government that no resumption of live export by sea be permitted under stricter regulation or alternate frameworks.**

## 2. Introduction

In April 2023, New Zealand drew a line in the sand. By ending the export of farmed animals by sea, we acknowledged a simple truth: this trade subjects animals to suffering that no regulatory framework can ever fully prevent. The ban was not only a matter of policy, but of principle. It was a recognition that our responsibility to animals does not end at the farm gate or the port.

This decision was celebrated both at home and abroad. It reassured the public that their voices had been heard after years of concern, particularly following the tragic loss of 5,867 cattle and 41 crew on the Gulf Livestock 1. It showed the world that New Zealand was willing to put animal welfare and ethical leadership ahead of short-term profit.

The Government is now progressing legislation to reintroduce live exports under a so-called “gold standard” of animal welfare. SAFE submits that this is not only misguided, but dangerous. The live export of animals by sea remains inherently high-risk and inhumane. No matter how modern the vessel, or how stringent the paperwork, animals confined on crowded ships for weeks at a time will suffer.

Crucially, the ban also acknowledged that once animals arrive in destination countries, their welfare cannot be guaranteed. Investigations have revealed mistreatment and slaughter methods, such as killing without stunning, that fall far below New Zealand’s legal requirements.

To undo the ban would not only re-expose animals to these risks but also erode public trust and diminish New Zealand’s reputation as a global leader in animal welfare.

### 3. Animal welfare risks during voyages

Live export by sea places animals in an environment fundamentally incompatible with their biological and behavioural needs. No amount of regulation or ship design can eliminate the suffering caused by weeks of transport under crowded, artificial, and volatile conditions.

#### 3.1 Heat stress

Heat stress is one of the most serious and consistent threats to animal welfare. Cattle exported from New Zealand are predominantly *Bos taurus* breeds, who are poorly adapted to tropical heat and humidity. When wet-bulb temperatures rise above 28°C, animals struggle to dissipate heat, leading to heavy panting, exhaustion, collapse, and in some cases death.<sup>1</sup>

Overcrowding, waste build-up, and restricted airflow onboard exacerbate the danger of heat stress. Thousands of animals are confined in close quarters, generating additional body heat while producing large quantities of faeces and urine each day. This waste coats floors and animals, trapping heat and raising humidity at pen level. In such conditions, animals cannot cool themselves effectively, leaving them highly vulnerable to overheating.<sup>2</sup>

#### 3.2 Poor air quality and ammonia build-up

The accumulation of waste also leads to a build-up of ammonia and other noxious gases. Ammonia concentrations on live export ships can exceed 20–30 ppm, levels known to cause eye irritation, respiratory illness, and weakened immune response.<sup>3</sup>

#### 3.3 Injuries and disease

Injuries and illness are unavoidable in the crowded, unstable conditions of live export vessels. Animals can slip on wet, waste-coated decks, leading to lameness, fractures, bruising, and pain, particularly during rough seas.<sup>4</sup> High stocking densities mean many animals are denied consistent access to feed and water, resulting in weight loss, dehydration, and in some cases inanition – a state of extreme exhaustion caused by prolonged undernourishment.<sup>5</sup>

The abrupt shift from pasture to pelletised feed commonly triggers digestive problems, while respiratory disease spreads rapidly in dusty, poorly ventilated pens.<sup>6</sup>

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1. Caulfield, M.P. et al. (2014). *Heat stress: A major contributor to poor animal welfare associated with long-haul live export voyages*. The Veterinary Journal, 199(2), 223–228. DOI: [10.1016/j.tvjl.2013.09.018](https://doi.org/10.1016/j.tvjl.2013.09.018)
  2. Department of Agriculture, Fisheries and Forestry. (2022). *Heat and Cold Stress in Bos taurus Cattle from Southern Australia during Long-haul Export by Sea*. Retrieved September 4, 2025, <https://www.agriculture.gov.au/sites/default/files/documents/final-report-heat-and-cold-stress-in-bos-taurus-cattle.pdf?>
  3. Pines, M.K. & Phillips, C.K. (2011). Accumulation of ammonia and other potentially noxious environmental conditions on livestock export voyages. *Journal of Animal Science*, 91(9), 4406–4416. DOI: [10.1039/c1em10425j](https://doi.org/10.1039/c1em10425j).
  4. Navarro, G., Col, R., & Phillips, C.J.C. (2018). *Effects of space allowance and simulated sea transport motion on behavioural and physiological responses of sheep*. Applied Animal Behaviour Science, 208, 40–48. <https://doi.org/10.1016/j.applanim.2018.08.009>
  5. Moore, S.J. et al. (2015). *Risk factors for mortality in cattle during live export from Australia by sea*. Australian Veterinary Journal, 93, 339–348. DOI: [10.1111/avj.12355](https://doi.org/10.1111/avj.12355)
  6. Ibid.



### 3.4 Psychological stress

Beyond physical harm, animals endure prolonged psychological stress.<sup>7</sup> Voyages last weeks, during which animals are confined in noisy, vibrating, unstable environments. They are mixed with unfamiliar groups, which increases aggression and prevents normal social behaviours. Dairy cows, who would naturally graze for up to eight hours a day, are confined in small pens and fed an unnatural diet. Stress hormones also disrupt immune function, leaving animals more susceptible to disease.<sup>8</sup>

### 3.5 Evidence from purpose-built ships

Industry proponents often argue that “purpose-built” livestock vessels reduce these risks. Yet the experience onboard the *Al Kuwait*, a purpose-built carrier, tells a different story. In February 2024 while docked in Cape Town Harbour, the ship carrying approximately 19,000 cattle emitted such a foul stench that it blanketed parts of the city; city officials and residents initially suspected a broken sewer main.

Inspectors from the National Council of SPCAs (South Africa) boarded the vessel and observed cattle coated in an extreme build-up of faeces and urine. Numerous animals were found injured, diseased, and deceased.<sup>9</sup> These conditions confirmed that hygiene, ventilation, and overall welfare failings can persist even on ships designed specifically for transporting live animals.



Al Kuwait, Cape Town Harbour (2024)

7. Navarro et al., *Applied Animal Behaviour Science*, 208, 40–48.

8. Van Engen, N. K., & Coetzee, J. F. (2018). *Effects of transportation on cattle health and production: A review*. *Animal Health Research Reviews*, 19(2), 142–154. <https://doi.org/10.1017/S1466252318000072>

9. National Council of SPCAs (NSPCA). (2024). “The Big Stink Leaves Cape Town, But Suffering Continues.” NSPCA. Retrieved September 4, 2025, <https://nspca.co.za/the-big-stink-leaves-cape-town-but-suffering-continues/>

## 4. Risks of disaster

Transporting live animals by sea is uniquely high risk. Animals cannot be evacuated in emergencies, making accidents catastrophic both for animal and human safety. The history of live export is marked by repeated disasters – sinkings, fires, heat stress incidents, and mechanical failures – that demonstrate systemic vulnerabilities. Analysis from the Guardian found that live export vessels are at least twice as likely to suffer a total loss from sinking or grounding as standard cargo vessels.<sup>10</sup> The following section highlights some of the most significant events in recent decades, though it is not an exhaustive record.

### 4.1 Sinkings

Sinkings represent one of the gravest risks of live export, causing mass fatalities among animals and humans.

- 4.1.1 **Al Badr 1 (2022)**: Sank in Sudan's Red Sea port of Suakin, killing nearly 16,000 sheep.
- 4.1.2 **Gulf Livestock 1 (2020)**: Sank in the East China Sea during Typhoon Maysak, killing all 5,867 cattle and 41 crew members.
- 4.1.3 **Queen Hind (2019)**: Capsized off the coast of Romania, killing 14,420 sheep. Recovery operations later revealed hidden decks containing even more dead animals.
- 4.1.4 **Haidar (2015)**: Capsized while docked in Brazil, killing most of the 5,000 cattle on board.
- 4.1.5 **Danny F II (2009)**: Capsized off Lebanon, drowning 10,224 sheep and 17,932 cattle. Of the 83 crew members, 43 are presumed dead. Investigations revealed structural deficiencies including corroded water-tight doors and faulty life-saving equipment.

### 4.2 Mechanical failures and groundings

Mechanical breakdowns and groundings leave animals stranded at sea for days or weeks, with fatal consequences.

- 4.2.1 **Express M (2025)**: Mechanical problems turned a 6-day voyage from Romania to Israel into 15 days. On arrival, 2,400 cows and 460 sheep were covered in excrement, with some cases of nasal discharge and ringworm.
- 4.2.2 **Lady Maria (2024)**: Ran aground off the coast of Greece leaving around 6,800 sheep and lambs stranded.
- 4.2.3 **Al Messilah (2016)**: Around 3,000 sheep died of heat stress en route from Fremantle to Doha after ventilation problems.
- 4.2.4 **Al Messilah (2011)**: Engine breakdown off Adelaide left 67,000 sheep stranded on board for a week; 300 died before the ship was allowed back to port.

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10. Kevany, S. (2020). Exclusive: Livestock ships twice as likely to be lost as cargo vessels. The Guardian. Retrieved September 4, 2025, <https://www.theguardian.com/environment/2020/oct/28/exclusive-livestock-ships-twice-as-likely-to-be-lost-as-cargo-vessels>

### 4.3 Heat stress incidents

Heat stress is the most common and insidious cause of mass mortality at sea.

- 4.3.1 **Awassi Express (2017)**: Around 2,400 sheep perished from heat stress. Observers not only reported extensive mortality but also distressing conditions such as sheep coated in waste and suffering from heat stroke.
- 4.3.2 **Al Messilah (2016)**: Around 3,000 sheep died under extreme heat and humidity, a mortality rate of about 4.36%.
- 4.3.3 **Bader III (2013)**: Approximately 4,179 sheep died during a voyage from Australia to the Middle East, representing a mortality rate over 5%. An investigation attributed nearly all of these deaths to heat stress under extreme weather conditions.

### 4.4 Disease and rejection cases

When shipments are rejected or delayed, animals may be stranded at sea for weeks or months, with devastating consequences.

- 4.4.1 **Bahrain (2012)**: 20,000 sheep were stranded at sea and later destroyed inhumanely after Pakistan refused entry. Reports described sheep being stabbed, clubbed, and buried alive.
- 4.4.2 **Cormo Express (2003)**: 57,000 sheep were rejected by Saudi Arabia. After two months at sea, 6,000 died on board. Survivors were slaughtered in makeshift facilities in Eritrea.

### 4.5 Risk probability vs. consequence

Industry argues that disasters are “rare.” While the probability of a given ship sinking may be low, the consequences are catastrophic: tens of thousands of animal deaths in a single event, alongside human fatalities. No other export industry accepts such disproportionate risk.

## 5. Welfare beyond New Zealand's jurisdiction

### 5.1 Loss of legal protection

Once animals leave New Zealand waters, the Animal Welfare Act 1999 no longer applies. While MPI has required assurances from importing countries, these are not legally binding. They rely on goodwill and voluntary compliance, and New Zealand has no mechanism to enforce welfare conditions overseas.

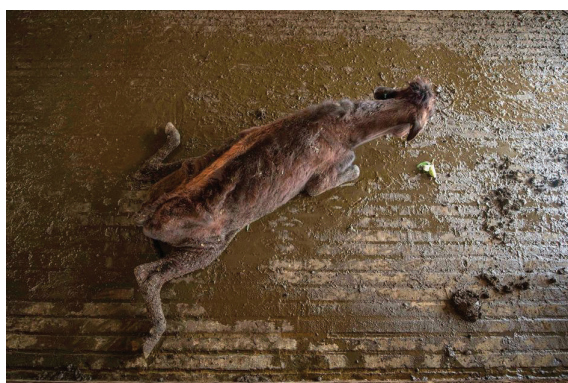
### 5.2 Documented poor welfare in destination countries

#### 5.2.1 Case Study: Sri Lanka

A 2019 ABC investigation in Sri Lanka exposed appalling animal welfare outcomes for dairy cows exported from both Australia and New Zealand. A subsequent investigation<sup>11</sup> found:

- **Starvation and emaciation:** Many cows arrived underweight and deteriorated rapidly despite being fed. Farmers reported that no matter how much they were given, cows “got skinnier and skinnier until they died.” Diseases such as BVD and Mycoplasma, previously unseen in Sri Lanka, went undiagnosed and untreated due to limited veterinary expertise and lack of vaccines.
- **Mass mortality:** Death rates were catastrophic across multiple farms. Nalau Dairy Farm lost 17 cows in the first three weeks and another 39 in six months. Of 144 calves born, only 11 survived past one month. At Green Meadows, 43 cows died within six months, and no calves lived beyond three weeks. At Lemmermoor, 170 cows died, and 176 calves were either stillborn or died within 72 hours.
- **Calf losses:** Several farms reported over 90% calf mortality. At Palku Plantation, 95% of calves died within a month; at Doritawaya Farm, every calf was either stillborn or dead within 72 hours.
- **Widespread reproductive issues:** At AgroFocus Enterprises, only 97 of 250 cows survived. Just 13 calves lived beyond four months, and daily vaginal bleeding was observed. Re-impregnation rates were dismal, with many cows aborting or failing to conceive.

This case demonstrates the severe and lasting harms that can occur once animals leave New Zealand's jurisdiction. It shows how quickly exported animals can fall into conditions of neglect and suffering, and underlines the reality that New Zealand has little practical ability to monitor, enforce, or improve welfare standards once animals are in destination countries.



Sri Lanka (2019)

11. DR Livestock Solutions. (April 2019). *Sri Lankan Dairy Farm Analysis Report*. [Report obtained by SAFE and can be provided upon request].



### 5.2.2 Case Study: Vietnam

In 2016, Animals Australia investigators documented the brutal deaths of Australian cattle in Hanoi, Vietnam. Video footage revealed animals being **sledge-hammered to death**, with at least five deaths captured on camera.<sup>12</sup>

Further investigation found Australian cattle in six non-approved abattoirs in Bai Do, a notorious slaughter village where sledge-hammering and water-forcing (forcing hoses down the throats of cattle to inflate the stomach with water before slaughter) were routine practices.

Even in “approved” slaughterhouses, oversight was inadequate. Animals were improperly stunned with Australian-supplied captive bolt devices, with slaughter commencing while animals were still alive and conscious.

Other findings included:

- Cattle with ear tags removed to avoid tracing back to exporters legally responsible for them.
- Animals whipped repeatedly on the face, head, and body by workers in pre-slaughter pens.
- Government reports acknowledging industry awareness of sledge-hammering as early as 2013, three years before this investigation, with more than 4,000 exported animals known to have been exposed to these practices.<sup>13</sup>

This case highlights the systemic failure of exporter supply chains to guarantee humane outcomes in destination countries. If Australia – with its larger industry, supposedly robust regulatory system (ESCAS), and direct oversight mechanisms – cannot prevent such cruelty, then New Zealand cannot reasonably expect to ensure higher standards for its exported animals.

Once exported, New Zealand’s animals face the same lack of enforceable protections and could be subjected to the very same brutal practices documented in Vietnam.

### 5.3 Breeding exports are not a safeguard

Industry stakeholders argue that exporting animals for breeding presents a more ethical alternative to slaughter consignments, suggesting that animals will be cared for and valued. However, evidence shows that this assumption is deeply flawed.

The Sri Lanka case study demonstrates the risks with stark clarity: hundreds of cows exported from New Zealand and Australia suffered starvation, disease, reproductive failure, and premature death. These outcomes occurred not because of isolated neglect, but because destination countries lack the veterinary expertise, feed resources, and infrastructure required to maintain acceptable welfare standards.

Even in countries with stronger agricultural systems, exported animals may spend years confined in intensive production systems before being slaughtered in ways that would be illegal in New Zealand. The welfare challenges do not end when the voyage is over; they simply shift into environments where New Zealand has no jurisdiction and little visibility.

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12. Animals Australia. (2016). *Vietnam cruelty shows live export industry can't be trusted*. Retrieved September 4, 2025, <https://animalsaustralia.org/our-work/live-export/vietnam-cruelty-shows-live-export-industry-cant-be-trusted/>

13. ABC Rural. (2014). *Cattle 'hit with sledge hammers'*. ABC News. Retrieved September 4, 2025, <https://www.abc.net.au/news/rural/2014-05-02/nrn-livex-reports/5425238>

Exporting animals under the label of “breeding” therefore offers no genuine safeguard. Instead, it risks condemning them to prolonged suffering in systems that cannot meet their needs.

#### **5.4 Ethical inconsistency**

Allowing exports on the basis of welfare standards that we would not tolerate in New Zealand undermines the very purpose of the Animal Welfare Act 1999, which requires that animals be protected from “unreasonable or unnecessary pain or distress.” To sanction suffering abroad while banning it domestically is ethically inconsistent and risks undermining public confidence in New Zealand’s animal welfare framework.

## 6. Public opinion and political support

### 6.1 Public opposition to live export

Public opinion on live export is clear and consistent: New Zealanders do not want the trade to resume.

In 2019, SAFE delivered a petition to Parliament with more than 30,000 signatures calling for an end to live animal exports, demonstrating that public concern about this trade has been consistent and long-standing.

Polling commissioned by the SPCA in 2024 found overwhelmingly low levels of public support for reversing the ban. Trust in the sector itself was strikingly low, with just 12% of respondents expressing confidence in live export.<sup>14</sup>

The petition of John Hellström ONZM, supported by more than 57,000 signatures, reinforces this public mandate. Support came from across political lines and communities, demonstrating that opposition to live export unites New Zealanders around a simple principle: animals should not be subjected to long and dangerous sea journeys.

This stance is echoed by working people directly connected to the industry. In 2024, the Maritime Union of New Zealand, representing seafarers and dockworkers, publicly resolved to oppose any resumption of live export. At its National Conference in November 2024, National Secretary Carl Findlay said, “*New Zealand would benefit from being seen as a modern and progressive exporter by ending such bad practices, rather than attempting to turn back the clock and return to the worst aspects of New Zealand’s past.*”<sup>15</sup>

Together, this evidence shows that the ban reflects both public values and the professional judgement of those closest to the realities of the industry.

### 6.2 Political commitment and stability

The Labour Party has now committed to reinstating the ban if it is overturned, citing risks to New Zealand’s reputation and the negligible economic value of the trade.<sup>16</sup> This means that any attempt to reinstate the trade is likely to be short-lived, creating policy instability and uncertainty for farmers and exporters. Upholding the current ban provides clarity, consistency, and stability for all stakeholders.



14. Royal New Zealand Society for the Prevention of Cruelty to Animals. (2024). *Live Exports: NZ Market Research*. Retrieved 4 September 2025, [https://www.sPCA.nz/images/assets/935592/1/camorra%20spca%20live%20exports%20research\\_web.pdf](https://www.sPCA.nz/images/assets/935592/1/camorra%20spca%20live%20exports%20research_web.pdf)

15. MarineLink. (2024). *NZ union opposes resumption of live export*. Retrieved September 4, 2025, <https://www.marinelink.com/news/nz-union-opposes-resumption-live-export-519569>

16. Labour Party of New Zealand. (2024). *Release: Live exports not in New Zealand’s future*. Labour Party. Retrieved September 4, 2025, <https://www.labour.org.nz/news/release-live-exports-not-in-new-zealand-s-future/>

## 7. International reputation and trade implications

New Zealand's decision to end live export by sea was hailed globally as an act of moral leadership. It signalled that a nation whose economy depends heavily on agriculture was prepared to prioritise animal welfare over short-term commercial gain. That bold step enhanced our international reputation, better aligning our practices with the values we promote in our global branding.

### 7.1 International momentum

New Zealand's ban was a catalyst for change abroad.

- 7.1.1 In 2024, the United Kingdom legislated to end the live export of cattle, sheep, goats, and pigs for fattening and slaughter.<sup>17</sup>
- 7.1.2 The European Union has committed to revising its animal transport regulations, with growing support for phasing out long-distance transport altogether.<sup>18</sup>
- 7.1.3 In 2024, Australia legislated a phase-out of live sheep exports by sea, with the ban to take effect on 1 May 2028.<sup>19</sup>

This momentum is not coincidental. It reflects a growing international consensus that the suffering caused by long-distance live transport cannot be justified. Reversing New Zealand's ban would place us out of step with this trajectory and risk isolating us at a time when trading partners are moving forward.

### 7.2 Reputational risk

New Zealand has built its agricultural identity on the promise of high welfare standards and sustainable practices. Consumers in key markets such as the UK and EU are increasingly scrutinising animal welfare as part of purchasing decisions. If New Zealand reinstates live export, it will be seen not as a nation committed to progress, but one whose policies are driven by commercial interests rather than the public good. This would jeopardise New Zealand's competitive advantage in global markets.

Reputational damage can be swift and far-reaching. When Australia's live export industry was exposed for cruelty in 2011, the footage sparked international outrage, leading to boycotts, cancelled contracts, and years of reputational repair.<sup>20</sup>

New Zealand risks a similar backlash if it turns away from the leadership position it currently holds.

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- 17. Department for Environment, Food & Rural Affairs. (2024). *Export of live animals banned*. GOV.UK. Retrieved September 4, 2025, <https://www.gov.uk/government/news/export-of-live-animals-banned>.
  - 18. European Commission. *Revision of the animal welfare legislation*. European Commission – Animal Welfare. Retrieved September 4, 2025, [https://food.ec.europa.eu/animals/animal-welfare/evaluations-and-impact-assessment/revision-animal-welfare-legislation\\_en](https://food.ec.europa.eu/animals/animal-welfare/evaluations-and-impact-assessment/revision-animal-welfare-legislation_en).
  - 19. Australian Government Department of Agriculture, Fisheries and Forestry, "Live sheep exports by sea: Decision and co-design," updated May 2024. <https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/live-sheep-exports-phase-out/decision-and-co-design>
  - 20. Schoenmaker, S. & Alexander, D. (2012). "Live Cattle Trade – The Case of an Online Crisis," *Social Alternatives* 31(2), 17-19, <https://researchoutput.csu.edu.au/ws/portalfiles/portal/8842774/40460postpub.pdf>



### 7.3 Moral leadership in trade

By maintaining the ban, New Zealand demonstrates that trade does not need to come at the expense of ethics. This is the form of leadership our international partners increasingly expect. Retreating from that stance would not only jeopardise our reputation but would weaken our influence in shaping global animal welfare standards.

## 8. Conclusion

The live export of animals by sea is not simply a matter of regulation. It is a matter of values.

When Parliament voted to end the trade in 2021, it recognised that no animal should be forced to endure weeks of confinement in crowded pens, standing in their own waste, struggling to breathe in stifling heat, and facing the ever-present risk of disaster at sea. That decision placed compassion above profit, and it was rightly celebrated both in New Zealand and around the world.

To reinstate live exports now would not only reopen the door to suffering, it would undo one of the most significant animal welfare achievements in our nation's history. It would erode public trust, place animals and crew in harm's way, and damage New Zealand's reputation as a global leader in animal welfare.

New Zealanders have made their position clear: this trade is unacceptable. The petition of John Hellström ONZM, supported by 57,357 signatures, reflects a deep and enduring public commitment to protecting animals from unnecessary suffering.

SAFE therefore urges the Committee to recommend upholding the ban in full. To do otherwise would be to turn away from the progress we have made, and from the responsibility we bear to ensure that animals are never again subjected to the cruelties of live export by sea.