

Submission for the Australian Animal Welfare Standards and Guidelines- Cattle

Dear Committee,

As a concerned member of the public, I would like to take this opportunity to comment on the Draft Australian Animal Welfare Standards: Cattle Standards and Guidelines. It is an expectation of the community that the Standards and Guidelines will ensure the humane treatment of every individual livestock so that animals do not experience distress, fear and pain in the everyday handling and husbandry procedures on farm and livestock premises.

General Comments

The Cattle Standards and Guidelines in their current form do not adequately address this basic community expectation of an assurance of high level humane outcomes in the various livestock production systems. The draft Cattle Standards and Guidelines fail to significantly raise the bar on current animal welfare practices for the following reasons:

- I. Many of the Standards are described as ‘outcome based’, resulting in confusion and misunderstanding, as well as posing difficulties for prosecution. These need to be revised and modified accordingly.
- II. Many of the Standards are not specific and therefore are open to interpretation resulting in weak legislation and poor enforceability. Greater improvement to the welfare of livestock could be achieved by adopting more prescriptive and higher welfare Guidelines into the Standards.
- III. The inclusion of weak terminology such as “reasonable”, “unreasonable”, “appropriate” and “relevant” in the Standards would be difficult to enforce as they are weak in legislative intent. The use of ambiguous terminology in a Standard reinforces current sub-optimal industry practices rather than improving industry welfare performance. At the very least “appropriate” should be uniformly replaced with “reasonable”, which would need to be specified in the glossary and must include timeliness.
- IV. Where a high welfare risk is known to be associated with specific practices and these have been described as Guidelines, it is recommended that these become Standards.
- V. The process following the closure of the public submissions to finalise the Cattle Standards and Guidelines document should be described.

Sections

I. Responsibilities

Standards:

S1.1 SUPPORTED

Guidelines:

G1.1, G1.2, G1.3 SUPPORTED

II. Feed and water

Standards:

S2.1 MODIFY

A person in charge must ensure cattle have ~~reasonable~~ access to adequate and appropriate feed and water.

Additional Standards:

S2.2 (G2.5 TO BECOME S2.2)

A person in charge must ensure that major changes in diet is introduced over a reasonable length of time and be closely monitored.

S2.3 (G2.6 TO BECOME S2.3)

A person in charge must ensure that shy feeders are identified and managed appropriately.

S2.4 (G2.8 TO BECOME S2.4)

A person in charge must ensure that self feeders are checked, cleaned and maintained regularly.

S2.5 (G2.10 TO BECOME S2.5)

A person in charge must ensure that cattle have access to water daily.

S2.6 (G2.11 TO BECOME S2.6)

A person in charge must ensure that lactating cows, and all cattle in hot weather, have access to water at least twice daily.

S2.7 (G2.12 TO BECOME S2.7)

A person in charge must ensure that calves removed from cows have access to water at all times.

Guidelines:

G2.1, G2.2, G2.3, G2.4, G2.7, G2.9 SUPPORTED

III. Risk Management of extreme weather, natural disasters, disease, injury and predation

Standards:

S3.1 SUPPORT

S3.2 MODIFY

A person in charge must ensure the inspection of cattle at intervals, at a level appropriate to the risk to the welfare of cattle and to the production system.

S3.3 MODIFY

A person in charge must ensure ~~appropriate~~ REASONABLE treatment for sick, injured, DISTRESSED, or diseased cattle at the first ~~reasonable~~ opportunity.

Additional Standards:

S3.4 (G3.1 TO BECOME S3.4)

A person in charge must ensure that reasonable action is taken to prevent and/or minimize the risks to cattle welfare in the event of;

- Breakdown or mechanical failure affecting feed, water, ventilation or milking
- Adverse weather – specifically, conditions that predispose cattle to heat or cold
- Flood or fire
- Insufficient supply of feed or water
- Disease outbreak or injury

S3.5 (G3.3 TO BECOME S3.5)

The person in charge must ensure that cattle are provided with adequate shelter to minimize risks during inclement weather.

S3.6 (G3.6 TO BECOME S3.6)

The person in charge must ensure that REASONABLE veterinary advice on cattle disease diagnosis, prevention or treatment is sought as required.

S3.7 (G3.7 TO BECOME S3.7)

The person in charge must ensure that cattle are vaccinated to protect against likely infectious diseases if there is a significant risk to the welfare of cattle.

S3.8 (G3.11 TO BECOME S3.8)

The person in charge must ensure that downer cattle are assessed and treated appropriately without delay.

Guidelines:

G3.2, G3.4, G3.5, G3.8, G3.9, G3.10, G3.12 SUPPORTED

G3.1, G3.3, G3.6, G3.7, G3.11 - CONVERT TO ADDITIONAL STANDARD

IV. Facilities and equipment

Standards:

S4.1 SUPPORT

Additional Standards:

S4.2 (G4.3 TO BECOME S4.2)

The person in charge must ensure that the surfaces of yards, pens, tracks and laneways are constructed and maintained to minimize the risk of lameness, slips and falls.

S4.3 (G4.4 TO BECOME S4.3)

The person in charge must ensure that facilities are free of protrusions and obstacles that may cause injury.

S4.4 (G4.6 TO BECOME S4.4)

The person in charge must ensure that faeces and urine accumulations are removed regularly.

S4.5 (G4.7 TO BECOME S4.5)

The person in charge must ensure that housed systems have hospital pens with a comfortable lying surface are used for sick or injured cattle.

S4.6 (G4.9 TO BECOME S4.6)

The person in charge must ensure that cattle have the opportunity for REASONABLE exercise each day.

S4.7 (G4.10 TO BECOME S4.7)

The person in charge must ensure that air is of an acceptable quality with respect to dust, chemicals, odours and smoke.

S4.8 (G4.11 TO BECOME S4.8)

The person in charge must ensure that concrete flooring in rest areas is covered by an adequate depth of REASONABLE bedding material.

S4.9 (G4.12 TO BECOME S4.9)

The person in charge must ensure that fire alarms and adequate fire fighting equipment should be fitted and maintained in all indoor housing systems.

GS.10 Cattle are not to be maintained in single pens for commercial production systems.

Guidelines:

G4.1, G4.2, G4.5, G4.8, SUPPORTED

G4.7 MODIFY

Downer cows should either be moved to a hospital pen or provided with a comfortable, safe area.

V. Handling and management

Standards:

S5.1 MODIFY

A person MUST NOT :

2) DROP cattle

3) STRIKE cattle. STRIKE* to be defined in glossary as 'to hit with force'.

5) BREAKING OR DISLOCATING THE TAIL IS NOT PERMITTED

S5.2 SUPPORT

S5.3 MODIFY

Electric prodders MUST NOT be used on cattle.

S5.4 SUPPORT

S5.5 MODIFY

A person in charge must ensure that dogs are not used when handling unweaned calves.

S5.6 MODIFY

A person in charge MUST NOT tether cattle.

S5.7 MODIFY

A person MUST NOT use electro-immobilisation on cattle.

S5.8 DELETE

S5.9 SUPPORTED

S5.10 SUPPORTED

Additional Standard:

S5.11

A person in charge must ensure that an earmark is not used to identify cattle.

S5.12

A person in charge must ensure that hot iron branding is not used to identify cattle.

S5.13 (G5.7 TO BECOME S5.13)

A person must allow cattle to rest or to slow if they show signs of exhaustion.

S5.14 (G5.8 TO BECOME S5.14)

A person must handle calves less than 30 days old with care.

S5.15 (G5.13 TO BECOME S5.15)

A person must not cause damage to soft tissue when foot paring.

S5.16 (G5.10 TO BECOME S5.16)

A person in charge must ensure that wounds are treated appropriately to prevent infection.

S5.17 (G5.28 TO BECOME S5.17)

A person in charge must ensure that ear tagging and tattooing is done in a way that minimizes the risk of infection and tearing of the ear.

S5.18 (G5.29 TO BECOME S5.18)

A person in charge must ensure that (DELETE ear marking) tattooing instruments are sharp and clean, and that hygienic techniques are used.

Guidelines:

G5.5 MODIFY

If handling aids are used, then drafting canes, flappers, flags, rattles and other noise makers are recommended.

G5.6 MODIFY

Use of dogs and electric prodders should be limited to the minimum necessary—not be used routinely.

G5.16 MODIFY

After husbandry procedures, REASONABLE management should be undertaken to ensure effective mothering-up of calves at foot.

G5.17 MODIFY

Cattle should not be handled during extreme weather.

G5.1, G5.2, G5.3, G5.4, G5.9, G5.11, G5.12, G5.15, G5.16, G5.18 SUPPORTED

G5.14, G5.20, G5.21, G5.22, G5.23, G5.24, G5.25, G5.26, G5.27 DELETE

VI. Castration, dehorning and spaying

Standards:

S6.1 SUPPORTED

S6.2 MODIFY

A person in charge must use pain relief when castrating cattle.

S6.3 SUPPORT

S6.4 MODIFY

A person in charge must use pain relief when dehorning cattle. It is strongly recommended
DEHORNING IS PHASED OUT

S6.5 MODIFY

A person must not use caustic chemicals to disbud calves.

S6.6 SUPPORT

S6.7 MODIFY

A person spaying a cow must be a veterinarian.

S6.8 MODIFY

A person must not use flank spaying or webbing in cattle.

S6.9 SUPPORTED

Additional Standards:

S6.10 (G6.4 TO BECOME S6.10)

A person in charge must ensure good hygiene practices are implemented in relation to facilities, operator hands, handling and instruments.

S6.11 (G6.8 TO BECOME S6.11)

A person in charge must ensure that bleeding from surgical wounds is minimized by selecting a REASONABLE method, preventing overheating of calves and allowing them to settle after mustering.

S6.12 (G6.9 TO BECOME S6.12)

A person in charge must ensure that infection is minimized by avoiding muddy or dusty yards, and wet weather.

S6.13 (G6.11 TO BECOME S6.13)

A person in charge must ensure that cattle are inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and REASONABLE action taken if there are signs of pain, bleeding or infection.

S6.14 (G6.13 TO BECOME S6.14)

A person in charge must ensure calves are more than 24 hours old when castrated.

S6.15 (G6.23 TO BECOME S6.15)

A person in charge must ensure that tipping only removes the solid, nonvascular portion of the horn resulting in a blunt horn end.

S6.16 (G6.24 TO BECOME S6.16)

A person in charge must ensure that horn regrowth or a scur that has a blunt end is not dehorned or tipped.

S6.17

Hoof paring MUST NOT cause soft tissue damage.

Guidelines:

G6.4 MODIFY

Convert 1st sentence to Standard. Retain 2nd sentence.

G6.1, G6.2, G6.3, G6.5, G6.6, G6.7, G6.10, G6.12, G6.14, G6.15, G6.16, G6.17, G6.18, G6.19, G6.20, G6.21, G6.25

Additional Guideline:

G6.26 Alternatives to spaying should be implemented where possible including segregation of cows from bulls, pregnancy testing and providing REASONABLE feed to pregnant cows.

VII. Breeding management

Standards:

S7.1 SUPPORTED

S7.2 SUPPORTED

S7.3 MODIFY

A person in charge must ensure that routine calving induction is NOT done.

S7.4 MODIFY

A person in charge must ensure that induced calves receive adequate colostrum AND SPECIAL CARE, or be humanely killed at the first reasonable opportunity, and before they are 12 hours old.

Additional Standards:

S7.5 (G7.1 TO BECOME S7.5)

Technician responsible for breeding management must be accredited and have an understanding of the reproduction and behaviour of both the cow and the bull.

S7.6 (G7.5 TO BECOME S7.6)

A person in charge must ensure that cows that receive severe injuries during calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) receive urgent and REASONABLE treatment, or are humanely killed without delay.

S7.7 (G7.6 TO BECOME S7.7)

A person in charge must ensure that weak or orphaned calves with very little chance of survival are promptly and humanely killed.

S7.8 A person must not restrain cows or heifers for bull serving capacity tests.

S7.9

Birth control procedures like flank spaying and webbing are not permitted.

S7.10

Electro-ejaculation is NOT permitted

Guidelines:

G7.8-G7.10 DELETE as routine calving must not be done.

G7.4 MODIFY

For 2nd and 3rd dot points, REPLACE 'avoiding' with 'not'.

G7.2, G7.3, G7.7, G7.11, G7.12- SUPPORTED

VIII. Calf-rearing systems

Standards:

S8.1, S8.3, S8.4 SUPPORTED

S8.2 MODIFY

A person must ensure calves that are housed in pens can turn around, lie down and fully stretch their limbs AND BE ABLE TO WALK FREELY TO EXERCISE.

Additional Standards:

S8.5

A person in charge must ensure calves are not housed individually for commercial purposes.

S8.6 (G8.1 TO BECOME S8.6)

A person in charge must ensure that calves that are removed from cows receive colostrum within 12 hours of birth, with the first administration occurring as soon as possible.

S8.7 (G8.3 TO BECOME S8.7)

A person in charge must ensure that if artificial feeding of new-born calves is required, the calves are supervised until they are successfully trained to self-feed.

S8.8 (G8.9 TO BECOME S8.8)

A person in charge must ensure that solid feeds are gradually introduced and roughage is provided to encourage the development of the rumen function from three weeks of age.

S8.9 (G8.10 TO BECOME S8.9)

A person in charge must ensure that feeding equipment is hygienically maintained.

S8.10 (G8.11 TO BECOME S8.10)

A person in charge must ensure that calves that become sick are placed in a hospital pen and treated immediately.

S8.11 (G8.12 TO BECOME S8.11)

A person in charge must ensure that a minimum floor area of 1.5-2.0m² is provided for each calf in group pens.

S8.12 (G8.13 TO BECOME S8.12)

A person in charge must ensure that calves are raised in an environment that is;

- Clean
- Dry
- Well drained
- Provided with sufficient bedding
- Draught free and well ventilated
- Free from projections that may cause injury
- Protected from weather extremes
- Provided with natural light

Guidelines:

G8.2 MODIFY

The colostrum should be of high quality.

G8.6 & G8.7 DELETE

- as S8.5 prohibits calves from being housed individually for commercial purposes.

G8.4, G8.5, G8.8, G8.14, G8.15- SUPPORTED

IX. Dairy management

Objective: SUPPORTED

Standards:

S9.1, S9.2, S9.3, S9.4 SUPPORTED

Additional Standards:

S9.5 (G9.1 TO BECOME S9.5)

A person in charge must ensure that milking machinery and equipment is regularly tested and maintained.

S9.6 (G9.8 TO BECOME S9.6)

A person in charge must ensure that extra teats are hygienically removed by a veterinarian using pain relief.

S9.7 (G9.9 TO BECOME S9.7)

A person in charge must ensure that calving in free stalls does not occur.

Guidelines:

G9.2, G9.3, G9.4, G9.5, G9.6, G9.7- SUPPORTED

X. Beef feedlots

Objective: SUPPORTED

Standards:

S10.1, S10.2, S10.5, S10.6, S10.7, S10.10 - SUPPORTED

S10.3 MODIFY

A person in charge must ensure REASONABLE AND ADEQUATE feed is available daily to cattle in the beef feedlot.

S10.4 MODIFY

A person in charge must do AND DOCUMENT a risk assessment each year for the heat load risk at the feedlot, and implement REASONABLE actions to manage ongoing heat load risk.

S10.8 MODIFY

A person in charge must ensure AND RECORD the daily inspection of all cattle within the feedlot.

S10.9 MODIFY

A person in charge must ensure PREGNANT COWS ARE IDENTIFIED AND PLACED IN A SAFE, COMFORTABLE AREA TO CALVE AND THAT REASONABLE MANAGEMENT OF NEWBORN CALVES IS PROVIDED TO ENSURE THEIR WELFARE.

Additional Standards:

S10.11 (G10.1 TO BECOME S10.11)

A person in charge must ensure that feedlots are accredited under a third party, audited quality-assurance system.

S10.12 (G10.6 TO BECOME S10.12)

A person in charge must ensure and document that new arrivals to a feedlot are closely inspected for injury and illness within 24 hours of arrival.

S10.13 (G10.14 TO BECOME S10.13)

A person in charge must ensure that water troughs are inspected daily and maintained in a clean condition.

S10.14

Feedlots must provide shade for all cattle.

S10.15

Feedlots must facilitate exercise for all cattle.

S10.16

Adequate roughage must be provided in feed.

Guidelines:

G10.9 MODIFY

Calves born in feed yards should be segregated with their mothers or PROMPTLY humanely killed.

G10.17 MODIFY - 3rd dot point

- management factors, which may include the provision of shade, provision of additional water troughs, ENSURING REASONABLE water temperature, PROVISION OF REASONABLE ration type and manure management practice.

G10.8 DELETE

- as covered under S10.9

G10.2, G10.3, G10.4, G10.5, G10.7, G10.10, G10.11, G10.12, G10.13, G10.15, G10.16, G10.18.

G10.19- SUPPORTED

XI. Humane killing

Objective: SUPPORTED

Standards:

S11.1, S11.3 SUPPORTED

S11.2 MODIFY

A person must BE TRAINED AND DEMONSTRATE the relevant knowledge

S11.3 MODIFY

DELETE THE WORD REASONABLE

S11.5 MODIFY

A person MUST NOT kill any cattle by a blow to the forehead.

Additional Standards:

S11.6 (G11.3 TO BECOME S11.6)

A person must ensure that three or more of the following signs are observed to determine whether the method used for humane killing caused death;

INSERT SIGNS LISTED ON PAGE 34 HERE.

S11.7 (G11.4 TO BECOME S11.7)

A person must ensure that bleeding out of unconscious cattle is done using a suitable, sharp knife and that the thoracic stick method is used.

Guidelines:

G11.2

Move subheadings and associated sections for Firearms and Captive bolt devices under G11.2 before Note: For adult cattle, a rifle.....

Under Captive bolt devices, REPLACE '*be accompanied by*' with '*done only with*' REASONABLE restraint...

Regards,

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