

Animal Liberation Queensland
Submission on
Australian Animal Welfare Standards and Guidelines – Section A: Cattle
04/05/13

Chapter 1: Responsibilities

S1.1 A person must take reasonable actions to ensure the welfare of cattle under their care.

Animal Liberation Qld (ALQ) submits that the concept of “reasonable actions” is ambiguous and there appears to be no rules, regulations or guidance underpinning this concept of reasonable actions. So it is very much open to interpretation considering the more detailed guidelines that follow are not enforceable.

This concern covers the use of ‘reasonable’, ‘appropriate’, ‘adequate’, or other similarly vague terms across all the Standards and Guidelines in this review.

ALQ believes that a more detailed standard is required here, one that encompasses many of the guidelines in G1.1 including but not limited to -

- obtaining knowledge of relevant animal welfare laws,
- understanding cattle behaviour,
- assessing the quantity, quality and continuity of feed and water supply, and
- identifying distressed, weak, injured or diseased cattle and taking appropriate action.

Chapter 2: Feed and Water

S2.1 A person in charge must ensure cattle have reasonable access to adequate and appropriate feed and water.

Feed and water are vital to all life and access is a necessity. The Cattle Guidelines provide that feed supply should be based on a number of factors including body weight, additional demands including pregnancy, age and weather conditions. ALQ submits that these factors should be introduced into the Standards.

Water

G2.12 Calves removed from cows should have access to water at all times.

G2.11 Lactating cows, and all cattle in hot weather, should have access to water at least twice daily.

As per above comments (S2.1), these Guidelines should be incorporated as Standards.

Calves and weaners

G2.17 Calves should receive adequate colostrum within 12 hours of birth, with the first feed occurring as soon as possible.

This clause should be a standard. Notwithstanding the final destination of the calves, their basic need for this first milk should not be denied.

Chapter 3: Risk management of extreme weather, natural disasters, disease, injury and predation

S3.3 A person in charge must ensure appropriate treatment for sick, injured or diseased cattle at the first reasonable opportunity.

This Standard is vague and requires narrowing which can be achieved through inclusion of some of the guidelines already provided.

G3.5 Unexplained disease and deaths should be investigated to formulate appropriate remedial and preventative actions.

Considering the objective of this chapter is to minimise the impact of threats to the wellbeing of the cattle, this Guideline has serious ramifications for herd health and so must be a Standard.

G3.11 Downer cattle should be assessed and treated without delay

As the reason for the downer cow could impact on herd health this warrants its inclusion as a Standard.

Chapter 4: Facilities and equipment

S4.1 A person in charge must take reasonable actions in the construction, maintenance and operation of facilities and equipment to ensure the welfare of cattle.

Again, ALQ submits that “reasonable actions” is too vague and should be further defined in the Standard.

G4.12 – Fire alarms and adequate fire fighting equipment should be fitted and maintained in all indoor housing systems.

For herd safety and the safety of people (including to comply with Workplace Health and Safety obligations), a reliable and well maintained fire alarm and fire fighting system must be a standard.

Chapter 5: Handling and management

S5.1 – A person must handle cattle in a reasonable manner and must not:

3) strike in an unreasonable manner, punch or kick;

The term “unreasonable manner” is too vague. An animal should not be struck in any manner likely to cause pain, injury or distress.

S5.3 – A person must consider the welfare of cattle when using an electric prodder, and must not use it:...

ALQ does not support the use of electric prods or any form of electro-immobilisation on cattle and calls for a complete ban on their use.

Handling and management - Guidelines

Many of the guidelines would serve animal welfare better as standards. For example:

- calves less than 30 days old should be handled with care because they not have developed following behaviours, and may also become easily fatigued,
- cattle should be closely supervised when dipping to prevent drowning,
- permanent tethering should be avoided,
- the correct time period of application and temperature of the iron should be used when hot-iron branding.

Chapter 6: Castration, dehorning and spaying

S6.1 – A person castrating or dehorning cattle must have the relevant knowledge, experience and skills, or be under the direct supervision of a person who has the relevant knowledge, experience and skills.

ALQ submits that this Standard requires significant revision. These highly invasive surgical procedures must be carried out only by veterinarians and all must be done with pain relief.

Castration

S6.2 – A person in charge must use pain relief when castrating cattle, unless cattle are:

1) – less than six months old;

All cattle being castrated must be given pain relief and as most cattle are castrated under the age of 12 months this Standard must be changed to remove the two exclusions. Cattle under 12 months of age are capable of feeling pain.

The guidelines (p22, G6.12) requires castration at less than 12 weeks of age. This Standard, S6.2 indicates that no pain relief is to be provided under the age of 6 months. ALQ submits that all cattle, including animals under 6 months, should require pain relief for these procedures.

Disbudding and dehorning

S6.4 A person in charge must use pain relief when dehorning, unless the cattle are:

1) – less than six months old; and

ALQ calls for mandatory use of pain relief for all cattle regardless of age when disbudding and dehorning.

G6.22 The hair around horn buds should be clipped before using caustic chemicals for disbudding.

ALQ submits that the practice of disbudding using caustic chemicals should be banned.

Spaying

S6.7 A person spaying a cow must be a veterinarian or, if permitted in the jurisdiction, be accredited or be under the direct supervision of a veterinarian or a person who is accredited.

Only a veterinarian should be doing procedures such as this. These procedures must require pain relief.

G6.2 Surgical procedures should be done with pain relief. Operators should seek advice on current pain minimisation strategies.

This Guideline must be moved to the Standards. Pain relief must be mandatory for all surgical procedures involved in spaying cattle, not just flank approach spaying.

G6.25 The dropped ovary technique (DOT) for cattle spaying should be used in preference to other surgical methods, where possible.

ALQ submits that female spaying should be banned, unless it is in the best interests of the welfare of the animal, or at a minimum, the DOT technique used only when absolutely necessary other female spaying techniques be banned. Pain relief must be mandated for this invasive procedure as a Standard.

Chapter 7: Breeding management

S7.1 A person performing artificial breeding procedures on cattle must take reasonable actions to minimise pain, distress or injury.

The term “reasonable actions” is again too vague and requires further clarification in the standard. A person performing artificial breeding procedures on cattle must ensure their actions minimise pain, distress or injury.

G7.1 Technicians responsible for breeding management should have an understanding of the reproduction and behaviour of both the cow and the bull.

This is a serious responsibility and this guideline must be made into a standard. It must be a prerequisite for anyone undertaking this kind of work to understand the process in both cows and bulls.

G7.5 Cows that receive severe injuries during calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) should receive urgent treatment, or be humanely killed without delay.

This guideline must be made into a standard to ensure prompt and correct handling of the cows. Without this revision this guidelines will not afford real protection to suffering animals nor are the persons in charge of the stock accountable for their actions.

G7.6 Weak or orphaned calves with very little chance of survival should be humanely killed.

This guideline must be changed to a standard.

Induction of calving

ALQ submits that the induction of calves, except where done for the welfare of the individual cow or calf, should be banned. Science has shown this practice to be detrimental to the cow and calf. Standards must be based on science. To ignore animal welfare science for economic reasons or reluctance to change is unacceptable.

Chapter 8: Calf-rearing systems

Objective – Calf-rearing systems are appropriate to minimise the risk to their welfare.

ALQ calls into question standards for calf-rearing systems that do not comment on the early separation of dairy cows and calves, lack of standards directly related to the feeding of calves and housing of calves that does not require them to be able to see each other. This section requires standards that cover these circumstances.

G8.1 Calves removed from cows should receive adequate colostrum within 12 hours of birth, with the first administration occurring as soon as possible.

As per above (G2.17), this clause should also be a standard. Notwithstanding the final destination of the calves, their basic need for this first milk should not be denied.

G8.6 Where there are two or more calves on a property, calves housed in single pens should be able to see neighbouring calves.

Apart from the general standard S8.2 stating calves must be housed in pens where they can turn around, lie down and fully stretch their limbs; the standards lack detailed protections for calves. ALQ submits that single pens for cattle should be banned. If the practice is to be allowed to continue, at a minimum, the standard must include that the ability of calves to see other calves is mandated in the Standards.

G8.13 Calves should be raised in an environment that is: clean, dry, well drained, provided with sufficient bedding, draught free and well ventilated, free of projections that may cause injury.

ALQ submits that this Guideline should be included in the Standard. In order to achieve acceptable welfare for calves, a safe, clean, dry, and comfortable environment should be a basic minimum standard.

Chapter 9: Dairy management

Objective – Dairy cattle are managed to minimise the risk to their welfare.

These standards are again lacking in sufficient mandated protections for dairy cows and only state generalisations relating to care and treatment of dairy cattle and nothing specifically mentioning milking machines, health conditions relating to milking such as mastitis or lameness. All of these are integral parts of the dairy industry and require detailed protections for the animals if the objective is to be attained.

Many of the guidelines listed should be enforceable standards. Guidelines that should be mandated as Standards include (but not limited to):

G9.2 The milking techniques should minimise the risk of discomfort, injury and disease.

G9.3 A lameness management strategy should be implemented and should include practices for prevention, early detection and effective treatment.

G9.5 A mastitis management strategy should be implemented and should include practices for prevention, early detection and effective treatment.

G9.6 During hot weather, access to drinking water should be available at all times.

G9.9 Calving in free stalls should be avoided.

Chapter 10: Beef feedlots

Objective – Cattle in feedlots are managed in a way that minimises the risk to cattle welfare.

The feedlot industry in Australia poses many welfare risks for cattle. If this objective is to be achievable, standards must be included that relate to issues such as a lack of sufficient individual space, a lack of a mandated shade per animal and a diet of sufficient roughage. All these are measurable indicators of good welfare.

S10.1 A person in charge must ensure a minimum area of 9m² per Standard Cattle Unit for cattle held in external pens.

ALQ welcomes mandated space per animal but believes the figure of 9m² is insufficient.

S10.4 A person in charge must do a risk assessment each year for the heat load risk at the feedlot, and implement appropriate actions in the event of a heat load emergency.

S10.5 A person in charge must have a documented Excessive Heat Load Action Plan, and must implement appropriate actions in the event of a heat load emergency.

It is acknowledged by industry that heat load is an issue in feedlots and that mechanisms must be in place to monitor, avoid and mitigate, where possible, heat load issues. ALQ appreciates the need for the precise assessment of the heat load at any given feedlot. Why is it that only the requirement for a plan is listed in these standards with no details on what those plans could be and no mandated requirement for shade? We note a general comment is made under the Standards that “shade or cover is provided in some feedlots”. This is an important issue that must be mandated so that in the event of a heat load episode the option of shade is already at hand.

Guidelines

Again, many of the Guidelines should be mandated as Standards to ensure welfare of cattle is adequately monitored.

Chapter 11: Humane killing

S11.2 A person must have the relevant knowledge, experience and skills to be able to humanely kill cattle, or be under the direct supervision of a person who has the relevant knowledge, experience or skills unless:

ALQ submits that to ensure all animals in this situation are killed as humanely as possible, the use of relevant Guidelines in this standard needs to be reconsidered. The incorporation of many of the Guidelines will help ensure that the most appropriate killing methods are employed.

S11.5 A person killing a calf by a blow to the forehead must ensure that the calf is less than 24 hours old.

ALQ submits that all cattle, including calves, should be killed as humanely as possible. The method of killing using a blow to the forehead should be banned.

G11.1 Recommended methods of humane killing include:

- *For adult cattle – close-range firearms use to the brain (including the temporal position) or captive bolt to the brain (see figure 11.1)*
- *For calves – firearms or captive bolt (see figure 11.1)*

It is recommended that these Guidelines be Standards.

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