



Submission

on the

Proposed Australian Animal Welfare  
Standards and Guidelines

for

Cattle

by the

Pastoralists & Graziers Association of  
Western Australia (Inc.)  
Livestock Committee

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## INTRODUCTION

The Pastoralists and Graziers Association of WA (Inc) (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions in Western Australia.

The PGA represents the majority of progressive Western Australian meat, wool and grain producers who believe in the benefits of competition and the reduction of government regulation within their industry. These include pastoral leaseholders and free hold farmers through the full spectrum of ownership from some of Australia's largest corporate pastoral groups, to family-owned companies and trusts and individual landholders in Western Australia.

The PGA Livestock Committee specifically represents the interests of Western Australian beef, sheep meat and wool producers in remote and rural areas. This submission is mainly focussed on pastoral issues, not on higher rainfall beef and dairy systems

## GENERAL COMMENT AND RECOMMENDATIONS

*The current Codes of Practice for the Welfare of cattle and sheep may have required updating based on current knowledge and technology. PGA believe that Government, and to a lesser degree Industry, have taken the Codes too far beyond the reach of legitimacy, practice and Industry viability in the Australian Animal Welfare Standards and Guidelines.*

*Australia already has Animal Welfare best practice in place. Further costly and impractical advice from non producing agencies will negate the legitimate position and viability of food production in Australia.*

As ' Guidelines', they must remain exactly that, in conformity with the position taken by PIMC 15 (SCoPI's predecessor organization), in May 2009, that **guidelines will not be regulated.**

*The proposed Australian Animal Welfare Standards and Guidelines include vast remote areas of animal production and they will need to be crucially amended to include practical implementation in those areas.*

*One of the repeated examples is:-*

Medicines prescribed by a veterinarian cannot be posted to the livestock producer, they have to be collected from or delivered by the veterinarian to the livestock producer.

In the regional and rural context, this is already difficult. The 'reasonable person' test should pertain to a person with practical industry experience and knowledge.

It would be totally impossible in the remote pastoral rangelands.



## SPECIFIC COMMENT AND RECOMMENDATIONS

### Guideline G2.1

Feed supply for cattle should minimise harmful metabolic and nutritional conditions, and be based on:

- body weight, and/or fat/body condition score
- extra demands associated with growth, pregnancy, lactation and exercise
- prevailing/predicted weather conditions.

The PGA believes that with respect to the first dot point, this guideline is more suited to feedlots and dairies and in pastoral areas it should be based on a good enough appearance to be sent to and accepted by an abattoir.

**Standard S3.1** - A person in charge must take reasonable actions to ensure the welfare of cattle from threats including extremes of weather, \*drought\*, fires, floods, disease, injury, and predation.

The PGA believes that the extent of extreme weather conditions are difficult to predict even for trained weather forecasters. However, it is accepted that all livestock producers do pay attention to weather forecasts and act accordingly and reasonably.

**Standard S5.2** - A person must not drive cattle to the point of collapse.

The PGA believes that in the pastoral context, this is not possible to do. Cattle driven by motor vehicles will bail up. The exception to this would be during helicopter mustering, and the industry considers this to be an unacceptable and inappropriate practice caused by a lack of management supervision over the aerial mustering process.

**S5.5** - A person in charge must ensure a dog is muzzled when moving calves less than 30 days old that are without cows.

The PGA believes this standard should be removed. In the pastoral context, a muzzled dog cannot drink water at will. A muzzled dog also implies a dog not under control of its master that consequently should not be working with calves

### Standard S5.7 - Electro-immobilisation

In the context of the pastoral industry, very few people use electro-immobilization and it is not extensively used. When it is used, it is to prevent skittish cattle that may kick or move from being injured during ear marking and dehorning.

The PGA notes that electro-immobilization equipment costs about \$2000 and the price barrier acts as an incentive for proper and correct usage.



## **Guideline G5.24**

Hot iron branding of wet cattle should be avoided.

The PGA questions the common sense of this guideline, as practical experience dictates that the brand will go cold and will not work under these circumstances.

## **Castration**

**Standard S6.2** - A person in charge must use \*pain relief\* when \*castrating\* unless cattle are:

- 1) less than six months old; or
- 2) less than 12 months old if at their first \*yarding\* and where the later age is approved in the jurisdiction.

The PGA notes there is currently no pain relief products that are economic, effective and registered. Without registration by the APVMA, veterinary medicines can not be used by livestock producers. It is silly to write an enforceable standard when livestock producers can not comply with it

The pastoral rangelands are used for extensive grazing, as distinct from the intensive grazing commonly found in smaller farms and feedlot situations. Extensive grazing means large numbers of free ranging cattle over large areas and long distances. Management practices are done at muster and experienced pastoralists know that it is all but impossible to have a “clean” muster that captures every single animal.

The PGA notes that castration is done for the benefit of the female cattle in the herd, and is not just a management practice to control fertility. If the ability to castrate male cattle is shaped by age limitations and if no other use for these uncastrated animals can be found (sent to abattoir or live export, or sold as a rodeo bull), an otherwise healthy and productive animal may need to be destroyed.

Pastoralism means large numbers of branded cattle. Pain relief would add to the complexity and cost of pastoral operations. The use of pain relief in general should be voluntary, allowing those who wish to do so to lead the way.

Consequently, this standard should be a guideline.

## **Disbudding and dehorning**

This standard *must only* be a guideline.

**Standard S6.4** - A person in charge must use \*pain relief\* when \*dehorning\* unless cattle are:



- 1) less than six months old; or
- 2) less than 12 months old if at their first \*yarding\* and where
  - i. the later age is approved in the jurisdiction.

*Again, this is currently superfluous as it is economically prohibitive, costly labour intensive and thankfully illegal due to lack of regulation in the circumstances of drug availability, purchase requirements and costly administration.*

**Standard S6.5** - No Comment.

**Standard 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.

This standard is not supported. The wording of Standard 6.7 as it was originally written in the Pre-Public Consultation Version of 16.10.12 is preferred.

That is: A person spaying a cow must be trained and accredited or be under the direct supervision of a person who has the relevant knowledge, experience and skills.

**Standard S6.8** - A person in charge must use \*pain relief\* when performing the flank approach for spaying or webbing of cattle.

***Not applicable.***

To ensure a consistent approach this standard *must* be removed.

The PGA also makes the following general comments about spaying:

- ✓ In the pastoral rangelands practitioners accredited by veterinarians do the work.
- ✓ For older cows that are likely to have had a calf, the flank approach is the best option.
- ✓ For flank approach spaying, the size of the incision depends on the arm size of the practitioner.
- ✓ The Willis Spay technique is not suitable for pregnant cows or large sized cows, the latter due to the requirement to manipulate the ovaries through the rectum, requiring the practitioner to have a long arm.

The PGA is agreeable to accepting this standard as a guideline when pain relief becomes commercially available *subject to viability impacts*.

## **Guideline G6.2**

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

This guideline makes no sense in the context of current pain relief products and the above standards. It should be removed, but if it must remain it should be reworded “could” instead of “should”.

The PGA also notes that Guidelines G6.3 to G6.6 are and have been standard practice in the pastoral industry.

## **Castration**

### **Guideline G6.14**

Calves less than two weeks old should be castrated by the rubber ring method in preference to the cutting method.

The PGA notes that in the pastoral industry, calves under two weeks old are released from the yards and not castrated.

Consequently this guideline should be removed as being too prescriptive.

In light of the above Guidelines G6.15 and G6.16 are not relevant and should be removed. They do not allow for the exercise of decisions on the different management practices that are required for different cattle in different areas of the different states.

## **Disbudding and dehorning**

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### **Guideline G6.18**

Preference should be given for breeding of naturally polled cattle.

The PGA supports this guideline.

### **Guideline G6.20**

Hot iron cautery should be used in preference to excision methods for disbudding calves.

Amongst experienced pastoralists, hot iron cautery is never used. The PGA questions the efficacy of the standards and guidelines process when it does not take into consideration the cattle management practices used in the pastoral rangelands.

### **Guideline G6.21**

Calves should be disbudded or dehorned as young as possible.

The PGA notes that in the pastoral industry, calves that are not showing horn, or only a small trace of horn, are not dehorned. Typically, dehorning on these young animals would be done at the second round of yarding when weaning. Consequently the animals are healthier and bigger and when they leave the yard they are better able to cope with the dehorning procedure.

The PGA also makes the following general comments about disbudding and dehorning. The guidelines are too prescriptive. These procedures do depend on age, breed, management and the animals' stage of development. In a dry year, the decision may be taken to allow calves to grow out for another year. In the pastoral context, calves will be let go if they are under age or too small.

### **Guideline G6.23**

Tipping should only remove a solid, non-vascular portion of the horn and result in a blunt horn end.

The PGA notes that under the Australian Standards for the Export of Livestock cattle with horns longer than 12cm (4.7inches) must not be prepared for export without special approval. Tipping is done but it is under varying conditions, situations and circumstances. This guideline will only cause confusion and should be removed.

The PGA notes that the other guidelines, that is G6.19, G6.22 and G6.24, are observed as common sense for all areas of cattle production.

## **Spaying**

### **Guideline G6.25**

The Dropped Ovary Technique (DOT) for cattle spaying should be used in preference to other surgical methods, where possible.

The PGA believes this guideline should be removed, as it is misleading. Whilst about 90% of cattle spaying is done using the Willis Spay technique, the remaining 10% to 15% of cattle have to be flank spayed. Typically flank spaying is used on cull animals.

## **Breeding management**

The PGA notes that Standards S7.1 to S7.4 are appropriate to particular production systems but these practices are not carried out in the same way in the pastoral industry.

The same can also be said about Guidelines G7.3 to G7.5.

## Induction of calving and bulls

The PGA notes that Guidelines G7.7 to G7.10 are appropriate to particular production systems but these practices are not, and cannot be carried out in the same way in the pastoral industry.

Guideline G7.12 refers to a procedure commonly called the Blockey test. It is not routinely carried out for the Bos Indicus bulls that are widely favoured in northern pastoral production systems. However, it can be a serious animal welfare issue when heavy weight bulls are used and females are not properly protected when restrained.

*It is the position of PGA that less emphasis be placed on Standards and more on Guidelines in this documentation in order to balance the current biased general interpretation of the Cattle Industry. Government and Industry has a responsibility to the continuation of the profitable operation of food production within the already good practice of animal welfare. All society and Industries, from the Vet Industry to the Animal Liberation Industries, will benefit only when producers recover the right to operate in an environment of good business, good management and fair governance.*

*This Governmental 'Vision' to establish a National livestock Welfare Standards based on community and Industry expectation is not a reason to legislate against productivity. The 'benefits' to Industry as stated in the 'Vision' are barely identifiable in this document and if included will most likely be based on ideology rather than facts.*

*It would be unviable, unsustainable and unethical to 'maintain and enforce' Standards and Guidelines as stated in the Business Plan when the ability to fund the enforcement of regulations and legislation, both by Governments and Industry, is unattainable. (Making it law is senseless at this point in time.)*

*Given the enormous geographical spread and range of cattle operations within Australia, and given the adoption of "best practice" approach within the cattle industry it would be unrealistic to implement legislative change in this instance.*



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