CATTLE STANDARDS AND GUIDELINES – Tail Docking of Dairy Cows

DISCUSSION PAPER

Prepared by the Cattle Standards and Guidelines Writing Group, February 2013

ISSUES

The main issues are:

1) Justification for tail docking

2) Cattle welfare issues associated with tail docking.

RATIONALE

Removal of the lower portion of the cow's tail is commonly referred to as 'tail docking'. Tail docking arose in New Zealand during the early 1900s as an attempt to reduce the incidence of leptospirosis in milking personnel. Some producers believe that tail docking improves working conditions for milking personnel, enhances udder cleanliness, decreases the risk of mastitis, and improves milk quality and milk hygiene. Support for these claims is largely anecdotal, and research has not identified any protection against the transmission of leptospirosis, improvements in udder hygiene, somatic cell count, or the prevalence of intramammary pathogens that could be attributed to tail docking. With the possible exception of improved worker comfort, producers have little to gain from adopting this procedure. An evaluation of the scientific evidence is presented in Appendix 1.

Behavioural evidence suggests that a proportion of calves experience some transient discomfort or pain during tail docking, and tail-docking older cattle using rubber rings has minimal effects. Although the acute effects of tail docking on dairy cattle, in terms of acute pain and distress, are probably low, the long-term adverse effects must also be considered. The procedure increases temperature sensitivity of the tail, and the presence of neuromas suggest that tail docking may be associated with chronic pain. Additionally, fly avoidance behaviours are more frequent in docked cattle.

Tail docking of dairy cattle is currently practiced by only a small minority of Australian dairy producers. Tail docking is illegal in many countries, including some of Australia's dairy trade partners and competitors. Ethical concerns arise when an invasive procedure such as tail docking is performed solely to enhance operator comfort (Hemsworth & Coleman 2001).
The dairy industry has taken initiatives to voluntarily phase out this practice. Simple management strategies, such as switch trimming and good dairy design, exist to provide a comfortable working environment for milking personnel, without compromising the welfare of the cow by tail docking. A recent national survey of Australian dairy farmers reported that 90% of dairy farmers now choose to use alternatives to tail docking, such as switch trimming and tail clips (Dairy Australia 2008).

RECOMMENDATIONS

The writing group studied the reasons for cattle tail docking. The most widely used methods are associated with a degree of pain. The writing group recommends that the following standards be introduced into legislation and the following recommended guidelines be published for industry consideration.

STANDARDS AND GUIDELINES PROPOSAL

OBJECTIVE

Tail docking is done only when necessary and in a manner that minimises the risk to the welfare of cattle.

STANDARDS

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

1) Lift off the ground by only the head, ears, horns, neck or tail unless in an emergency; or

2) Drop except to land and stand on its feet; or

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

4) Drag cattle that are not standing, except in an emergency, for the minimum distance to allow safe handling, lifting, treatment or humane killing; or

5) Deliberately dislocate or break the tail of cattle; or

6) Use metal pellets to wound as an aid for mustering.

S9.3 A person must tail dock cattle only on veterinary advice and only to treat injury or disease.

GUIDELINES

NB This material relates to the surgical procedures of cattle and has been written to reflect a single chapter in the document.

G.1 Tail docking should only be done where there are no alternatives and the procedure results in either:

- Life-time benefits to cattle welfare, or
- Better herd management, or
- A reduced work health and safety risk.

G.2 Tail docking should be done with pain relief. Operators should seek advice on current pain minimisation strategies.

G.3 Good hygiene practices should be implemented in relation to facilities, hands, handling and instruments. Disinfectant should be used and changed frequently.

G.4 Effective but not excessive restraint should be used to minimise movement and to enable the procedure to be done quickly and efficiently.

G.5 Equipment for restraining cattle should only be used:

- For the minimum time necessary with the minimum restraint necessary, when it is suitable
- If it is in good working order.

G.6 Bleeding should be minimised.

G.7 Infection should be minimised by avoiding muddy or dusty yards, and wet weather.

G.8 Tail docking should not be undertaken during extreme weather.

G.9 Cattle should be inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken.

METHODS OF TAIL DOCKING

A variety of methods have been used to dock tails in dairy cattle, including cauterizing docking irons, application of elastrator bands, use of emasculators, and surgical excision. The application of elastrator bands (routinely used to castrate bull calves) is the most commonly employed method, and is preferable to docking with a hot iron as the risk of haemorrhage is reduced (Petrie *et al*. 1996). Rubber rings cause a lack of oxygen in the tissues distal to the ring as a result of the diminished blood supply. The necrotic tail below the rubber ring is often amputated after 7 days by using clean shears or it detaches 3 to 7 weeks after banding. Trimming of the switch hairs ("switch trimming") is not tail docking.

The docking iron produces second or third degree burns and so may destroy nerve endings after initial intense pain. The ring, in contrast, is more likely to cause chronic irritation rather than intense pain. Hot docking-irons need to be maintained at the correct temperature to avoid repeated applications (too cold) or unnecessary tissue damage (too hot). Both banding and hot iron cautery methods cause some acute pain and distress, but considerably less than cutting methods of tail removal, which are also associated with greater risks of bleeding and infection (NAWAC 2005).

TAIL LENGTH

Generally between 1/3 and 2/3 of the tail is removed. In New Zealand, regulations limit the tail shortening to the last two to three vertebrae, comprising only the switch (NAWAC 2005). Placement distal to the sixth coccygeal vertebra has been recommended to ease the docking process and to avoid leaving a tail that is too short for proper restraint or that parts the vulva lips and allows manure contamination of the urogenital tract (Stull *et al*. 2002).

AGE

Tail docking is usually done on calves near weaning age or on pre-parturient heifers.

ANIMAL WELFARE IMPLICATIONS

Evaluation of the scientific evidence on the benefits of tail docking

Reduced risk of leptospirosis in milkers
Urine from infected animals is the primary source of transmission of leptospirosis. Infection can occur via contact with skin abrasions or wounds, or via contact with the mucous membranes of the eyes, nose, and mouth. Docking is thought to reduce the risk of leptospirosis by eliminating the possibility that a urine-soaked tail could contact the milker's skin or face, although no scientific evidence exists to support this hypothesis (Wilson 1972; Mackintosh *et al*. 1982).

Improved cow and udder cleanliness
Anecdotal support for tail docking centres on the hypothesis that a soiled tail can inoculate the udder with pathogens. One study revealed that rear-quarter cleanliness was greater for docked cows compared with intact cows; however, no statistical differences were observed with respect to udder cleanliness or somatic cell count (SCC)(Eicher *et al*. 2001). In another study, no difference in cow cleanliness, udder cleanliness, and SCC scores was observed in docked heifers compared with intact heifers (Tucker *et al*. 2001). Another New Zealand study of cows on pasture found no difference in cleanliness between cows with tails and those that had been docked (Matthews *et al*. 1995). Researchers identified that udder and teat cleanliness is very variable between individuals and not related to tail docking, with factors such as shed design, laneway condition and management attitudes and practices to be the dominant influence.

Reduced incidence of mastitis and improved milk hygiene
Environmental pathogens present in dirt, manure, and water can cause mastitis in dairy cattle. Tail docking is reported to decrease the incidence of mastitis caused by environmental pathogens by eliminating the possibility that a heavily soiled tail or tail switch would come in contact with the udder. A review of the related scientific literature reveals leg cleanliness scores were improved in docked cattle compared with intact cattle, but no significant differences were observed in SCC, udder cleanliness, or intramammary infection between docked and intact cattle (Schreiner & Ruegg

2002a). Although docked cattle had a higher incidence of mastitis in one study (Tucker *et al*. 2001) the difference was not statistically significant.

Anecdotal reports of the health and production benefits of tail docking, such as reduction in the prevalence of mastitis, less bacterial contamination of milk, or less risk of leptospirosis in dairy operators are **not** currently supported by data in the scientific literature. It is difficult to justify the practice of tail docking of dairy cattle in terms of improved animal or human health, or animal welfare, in the absence of a proven benefit.

Review of the animal welfare implications of tail docking of dairy cattle

Acute pain associated with tail docking

Tails are richly supplied with nerves and blood vessels, so the intensity and duration of pain associated with docking is a welfare concern. The greatest challenge for determining the severity of pain associated with tail docking in cattle lies in an accurate assessment of signs of pain in this species. Application of a tight band around the tail compresses the underlying arteries and veins, and results in ischaemia. Continued ischemia induces severe cellular damage and coagulation necrosis. Ischemic lesions of the intestinal tract or limbs are known to cause pain during the acute phase, followed by decreased pain as the lesion progresses.

(a) Studies in calves

Three-week-old Holstein calves have been observed to exhibit increased walking or running behaviour, increased head-to-tail movement and licking, and less tail swinging and lying behaviour following application of a rubber ring for tail docking. These actions have been interpreted as indicators of mild distress. Distal tail sensitivity to heat was absent by 60 to 120 minutes post-banding, indicating desensitization of the tail below the banding site (Eicher & Dalley 2002).

An effect of age on the behaviour of calves that were docked using rubber rings was observed. Banded 22- to 42-day-old calves exhibited significantly more rear visualization and restlessness when compared with banded 7- to 21-day-old calves and intact calves of the same age, (Schreiner & Ruegg 2002b). The authors concluded that, although age-related behavioural differences were observed, tail docking of calves produced a minor response.

A New Zealand study examined the behavioural responses to tail docking with a rubber ring, with or without the use of local aesthesia in calves at three to four months of age (n=45) (Petrie *et al*, 1995). The authors reported that 67% of calves showed an immediate behavioural change after tail docking using rubber rings. Tail shaking was detected in 10 of the 15 banded calves during the first 30-minute period after treatment. Crying and restlessness were detected in the rubber ring group immediately after docking and were recorded in calves that received rubber ring and local anaesthesia for up to 2.5 hours after treatment. Local anaesthesia before docking reduced all behavioural changes for about 2.5 hours. The authors concluded that tail docking using rubber rings caused a behavioural response, but not enough to cause a difference in normal feeding behaviour. Calves tail docked using rubber rings were compared with those docked with a heated docking iron (Petrie *et al*. 1996). With rings there was no significant rise in the stress hormone cortisol in the first

8 hours, while with the docking iron there was a sharp rise in the first 45 minutes. Some calves docked with the iron also haemorrhaged and had to have their tail stumps bandaged.

Modest changes in behaviour were seen for 7-17 day old calves that were docked using rubber rings as compared to the controls and calves that were docked using a hot iron. The use of rubber rings for docking increased the frequency of tail licking. More restlessness (getting up and down) was seen in calves that received rubber rings as compared to the other animals. The researchers concluded that tail docking using a rubber ring apparently caused some discomfort to calves that were docked within the first few weeks of birth, with behavioural changes persisting for up to day 5 compared with controls or calves docked with a hot iron (Tom *et al*. 2002b).

(b) Studies in heifers and adult cows

An early New Zealand study found that adult animals showed some response in the hours that follow application of a tail docking ring, including swelling, tail swishing, and an increase in plasma cortisol (Wilson 1972). In non-lactating dairy heifers, tail docking using an elastrator band resulted in few physiologic or behavioural indicators of pain. Banded heifers spent more time eating during the week following banding, which may have represented displacement behaviour and mild distress; these behaviours returned to pre-banding levels when necrotic tails were removed. Increases in plasma cortisol concentrations, considered indicators of stress, were not observed (Eicher *et al*. 2000). No differences were reported for most other behaviours and the researchers concluded that tail banding had no measurable effect on behaviour. Another study observed restlessness during the first hour after banding in preparturient heifers, but the finding was not statistically significant, the authors concluding that the process of tail banding and atrophy did not affect behaviour observed on numerous occasions for up to 6 weeks after banding (Schreiner & Ruegg 2002a).

Tom *et al*. (2002a) found that following application of rubber rings, lactating dairy cows exhibited subtle behavioural changes (e.g. spent significantly less time holding their tails in the raised position, and significantly more time with their tails in the pressed position), but no differences were observed in feed intake or milk production. Holding the tail in the pressed position was interpreted as an indicator of discomfort. Significantly less tail shaking was observed in banded cows, and was hypothesized to be related to pain associated with shaking the recently banded tail. No differences were observed in behaviour of cows docked with or without epidural anaesthesia. The investigators involved in that study concluded that tail docking by rubber rings was associated with minimal discomfort in cows, and that use of epidural anaesthesia provided no benefit.

Collectively, these studies suggest that tail docking by banding or hot-iron cautery in both calves and adult cattle can cause mild discomfort of limited duration, and there is little or no apparent benefit gained through the use of anaesthesia.

Chronic pain—following trauma to peripheral nerves (including that induced by banding and docking), continued growth of damaged nerve axons may result in the formation of a mass of tangled axons called a neuroma. Neuromas are associated with chronic pain, and may play a role in post-amputation pain in humans (Stull *et al*. 2002). Neuromas have been reported to develop after beak trimming in poultry, and tail docking in pigs and lambs (Breward & Gentle 1985; Simonsen *et al*.

1991; French & Morgan 1992) and have been observed at slaughter in tail stumps of adult cattle that had been docked using a knife at 12 to 18 months of age (Barnett *et al*. 1999). Neuroma formation following tail amputation has also been documented in 5 month old calves and heifers (Lunam *et al*. 2002; Eicher *et al*. 2006). Docked heifers show signs of chronic pain as indicated by greater sensitivity to heat and cold of the tail stump (Eicher *et al*. 2006). These findings were comparable to those observed in humans experiencing phantom limb pain following amputation, and were interpreted as indicators of chronic pain. It is possible that traumatic neuromas and, as a consequence, chronic pain or altered sensitivity of the nerves in the tails may exist following amputation of tails.

Physiologic stress—Blood cortisol concentrations have been studied as indicators of physiologic stress in animals. Tail docking of preparturient Holstein heifers did not result in significant alterations in cortisol concentrations, physiological parameters or immune function were caused by the process of tail docking (Eicher *et al*. 2000; Eicher *et al*. 2001; Schreiner & Ruegg 2002b). The plasma cortisol concentrations of 7-17 day old calves were elevated 60 minutes after tail banding, compared with controls or calves tail docked with a hot iron (Tom *et al*. 2002b). Docking with rubber rings or a docking iron did not significantly increase blood cortisol concentrations of three week old calves above those associated with handling and sample collection (Petrie *et al*. 1996). These investigators found no detectable benefit of using an epidural anaesthetic, based on the cortisol response. In fact, in some cases, the use of a local anaesthetic seemed to have increased the cortisol responses to the rubber rings or docking iron, suggesting that the anaesthetic may be more stressful in cattle than the actual application of the rubber ring and the ischemia that follows (Petrie *et al*. 1995; Petrie *et al*. 1996).

Disease

Necrotic tissue, such as the ischemic distal tail after banding, is prone to infection with pathogens. Clostridial organisms, ubiquitous in soil, may colonize the wound and result in local or systemic infection. Tetanus and gangrene have been reported after tail docking, and vaccination against clostridia is recommended prior to performing the procedure (Stull *et al*. 2002).

Behaviour

The role of the tail in communication between cattle has not been documented, but it has been speculated that tail docking limits the ability of cattle to exhibit normal signalling behaviour (Kahler 2002). In addition, the tail is widely believed to play a role in fly control; shaking the tail and brushing the body and limbs can dislodge biting flies. The stable fly (*Stomoxys calcitrans*) is a common disruptive fly, and its presence has been associated with increased stress, reduced milk production and weight gain, disrupted grazing, and reduced growth. Observed fly avoidance behaviours include stomping, kicking the trunk, tail swishing, skin twitching (panniculus reflex), head and ear motion, and taking flight (Eicher *et al*. 2001; Eicher & Dalley 2002).

Fly counts have been observed to be greater on the rear limbs of docked three-week-old calves during times of high fly activity (Eicher & Dalley 2002). These authors found that docked calves showed more discomfort and fly avoidance behaviours than undocked calves. Several studies have confirmed that although front limb fly avoidance behaviours did not differ, rear limb fly avoidance

behaviours were significantly increased in docked cows when compared with intact cows (Phipps *et al*. 1995; Eicher *et al*. 2001). Almost twice as many flies were observed on the rear limbs of docked cows compared with control cows (Ladewig & Matthews 1992; Eicher *et al*. 2001). Tail-docked cattle show increased fly-avoidance behaviour, to such an extent that grazing and rumination are disturbed (Hemsworth *et al*. 1995). An extensive New Zealand study found that fly avoidance behaviour is compromised by switch trimming but not as severely as by tail docking, which prevents normal fly avoidance behaviour and is detrimental to the cow's welfare (Matthews *et al*. 1995).

Summary

Behavioural observations suggest that tail docking with rubber bands or hot-iron cautery causes mild and transient acute discomfort in a proportion of docked calves. Tail docking heifers or cows using rubber rings have minimal acute effects. The use of local anaesthetics has **not** been shown to significantly reduce physiological or behavioural responses of calves to tail docking by cautery or rubber bands. One potential cause of chronic pain following tail docking is formation of an amputation neuroma in response to nerve damage.

There is **no** proven scientific benefit to the cow for tail docking. Fly avoidance is an important function of the tail and there is good evidence that docking impairs the cow's ability to control flies.

REVIEW OF NATIONAL POLICIES AND POSITIONS

The current **Australian Model Code of Practice** for the Welfare of Animals: Cattle 2nd edition 2004 states that:

- Tail docking of dairy cows should be done only where necessary for udder health or when otherwise prescribed by a registered veterinary surgeon
- Docking should be undertaken only on young female cattle under 6 months of age
- Animals being docked surgically must receive analgesia or anaesthesia for tail docking
- The tail should be removed between, not through, the tail bones. Sufficient length of tail should remain to cover the vulva
- In some States, tail docking of cattle is prohibited, except where prescribed and done by a registered veterinarian.

A detailed discussion of jurisdictions legal requirements for tail docking is contained in Appendix 1.

The **Australian Veterinary Association** (AVA) 8.2 Tail docking of cattle policy states:
"*Tail docking in cattle should be performed only for therapeutic reasons on veterinary advice"*

RSPCA Australia 2008 relevant policy is as follows:

4.6 Invasive animal husbandry procedures

"*4.6.1 RSPCA Australia is opposed to any invasive animal husbandry procedure for which there is no established need, which only benefit the human handler of the animals concerned, or that is performed to overcome the adverse effects upon animals of the production system they are in.*

4.6.2 If an invasive procedure is to be performed, it must be undertaken at the earliest age possible, be performed by an accredited operator and be accompanied by appropriate pain-relieving and / or pain-preventing products."

The RSPCA Australia Position paper B4 'Invasive farm animal husbandry procedures' states:

13 Tail docking

"13.1 The docking of the tails of any farm animal species must only be carried out under veterinary advice on the grounds of an individual animal's health.

13.2 Dairy cows

a. RSPCA Australia does not support the docking of the tails of dairy cows as a management strategy to improve the safety of dairy staff. The loss of the tail prevents the cow from reducing fly bites and the procedure itself causes acute and sometimes chronic pain.

b. Switch trimming of dairy cows is an acceptable alternative means of preventing the problems associated with dirty tails".

REVIEW OF INTERNATIONAL POLICIES AND POSITIONS

These policies and position statements are included to provide a brief international context, while acknowledging that Australia's cattle production systems may vary significantly from production systems, cattle breeds and climatic conditions in other countries.

Tail docking is prohibited in Denmark, Norway, the Netherland, Switzerland, Germany, Sweden and in the United Kingdom (for over 30 years). The Canadian Recommended Code of Practice for the Care and Handling of Dairy Cattle (National Farm Animal Care Council 2009), states that dairy cattle must not be tail docked unless medically necessary, and a licensed veterinarian must perform the tail amputation.

The Canadian Veterinary Medical Association (CVMA), the American Association of Bovine Practitioners (AABP), the Australian Veterinary Association (AVA) and the American Veterinary Medical Association (AVMA) officially oppose tail docking of dairy cattle except when it is performed for therapeutic reasons (CVMA 2003; AABP 2005; AVMA 2005; AVA 2008). AVA policy states that tail docking of cattle is a surgical procedure, which should be done by a registered veterinarian.

In **New Zealand**, the *Painful Husbandry Procedures Code of Welfare* (NAWAC 2005) minimum standards relating to tail docking of cattle are:

“If tail shortening is undertaken it must be limited only to removal of the last (terminal) two or three vertebrae of the tail, using a rubber ring applied between joints, and either be left to drop off of its own accord, or not less than seven days after the application of the rubber ring, be severed by the use of a sharp instrument at a point below where the rubber ring has been applied, and in a such a manner as not to cause discomfort to the animal.”

The New Zealand recommended best practice advises that switch removal in cattle should only be considered for those animals with persistently compromised hygiene, and only after alternative solutions, including regular trimming of the switch hair, have been attempted and have failed.

DEFINITIONS

pain relief	The administration of drugs that reduce the intensity and duration of a pain response.
supervision	A person (the supervised person) is acting under the *supervision* of another person (the supervisor) if the supervisor: (a) provides instructions and guidance to the supervised person in relation to the subject activity; and (b) oversees and evaluates the performance of the activity by the supervised person; and (c) is contactable by the supervised person. See 'direct supervision'.
tail docking or docking	The removal of a portion of a cow's tail, or actions that cause the loss of a section of the tail. It does not include any trimming of the switch hairs (the bush).

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APPENDIX 1 – JURISDICTION LEGAL REQUIREMENTS

Summary:

- **Very few actual regulations**
- **Current situation is largely unenforceable but does reflect jurisdictional values**
- **Veterinarians Acts may provide defacto control but are not primarily welfare orientated.**

Existing regulations poorly mandate the age at which veterinary intervention or the application of pain relief is required. The preferred ages appear to be 6 or 12 months old.

Jurisdiction	Cattle	Relevant Act and comment on general application
Industry Issue	Predominantly dairy. Some occurrence in beef industry to treat disease and injury only.	
MCOP	Guidelines only. section 5.6 Should be done < 6 months old on young female dairy cattle. should be done by vet and must be with analgesia.	The MCOP is variously referred to in legislation but the 'must' statement is considered to be a requirement. The intent of the Veterinarians Acts, where they exist, is only indirectly focussed on animal welfare and does not really set performance criteria for welfare practices.
QLD	Prohibited unless by vet for vet treatment.	Animal Care and Protection Act 2001 **27 Docking tail of cattle or horse** (1) This section applies for an animal as follows— (a) cattle; (b) a horse. (2) A person, other than a veterinary surgeon, must not dock the animal's tail. (3) A veterinary surgeon must not dock the animal's tail unless the surgeon reasonably considers the docking is in the interests of the animal's welfare.
NSW	A. POCTA section 12(2) (a) allows docking of tails of calves under 6 months of age. Over this age it must be carried out by a vet [POCTA 12(2)(b)(i)]	(2) A person is not guilty of an offence against this section if the court is satisfied that the procedure comprising the alleged offence: (a) was docking the tail of a calf less than 6 months old when the offence was alleged to have been committed, or (b) was:

	6 months in Veterinarians Act & Regs. Similar situation	(i) docking the tail of a cow, heifer or female calf, And done by a veterinarian.
VIC	As per MCOP Tail docking is not a prohibited procedure under POCTA. Cruelty must be proven.	POCTA Code requirement, prosecution of a cruelty case under POCTA if not done according to code is problematic as most statements are 'shoulds' except for pain relief.
TAS	6 months recommend by TAS COP	POCTA – general cruelty provision Animal welfare legislation silent on this issue, therefore general cruelty provisions apply. Tas is hoping the national S&G process will deliver measurable animal welfare standards for regulation.
SA	Only under vet advice or treatment	Animal Welfare Regulations 2012 **Part 2—Animal welfare offences** **6—Ill treatment of animals** (1) For the purposes of section 13 of the Act, a person ill treats an animal if— (a) except where a veterinary surgeon has certified in writing that any of the following procedures is necessary for the control of disease—the person— (iv) docks or nicks a horse's tail or docks the tail of cattle or buffalo; or (2) However, a person who is a veterinary surgeon may— (b) if satisfied the procedure is required for therapeutic purposes— (ii) dock, or authorise another person to dock, the tail of cattle; or
WA	POCTA	The Animal Welfare Act 2002 and its Regulations and the Veterinary Surgeons Act 1960 do not mention any requirements for livestock. The Codes of Practice for WA which do mention requirements for livestock are not mandatory codes, only a defence under the Act.
NT	No dairy in NT For beef it may be permitted for treatment:	Vet Surgeons Regulations 6 (c) 27 March 2007 Animal welfare Act 6 (3) (1) A person must not neglect or commit an act of

		cruelty on an animal. (3) In this section, "an act of cruelty" includes the following: (a) an act that causes an animal unnecessary suffering; (b) an act that causes an animal suffering and is unreasonable in the circumstances; (c) treatment that is inhumane in the circumstances.
ACT	No dairy in ACT	CoP listed under the Animal Welfare Act 1992 While the CoP are mandatory there is no mechanism for punishment of breaches, other than general cruelty offences under the Act itself – like NT.