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The Victorian Department of Environment and Primary Industries (DEPI) would like to acknowledge the enormous amount of work that has gone into the drafting of the *Australian Animal Welfare Standards and Guidelines – Cattle* by Animal Health Australia, the Reference and Writing groups and all stakeholders.

DEPI acknowledges the constraints of undertaking a cost–benefit analysis in the development of a consultation Regulatory Impact Statement (RIS) for comparison with the ‘base case’ and the unquantifiable welfare benefits. Another unquantifiable benefit of the adoption of these Standard is the associated reduction in risks to the livestock industry and Australia’s reputation.

The DEPI generally supports **Option B** of the draft *Australian Animal Welfare Standards and Guidelines - Cattle* with the following variations and suggested amendments as indicated in the following submission and table below.

### **DEPI position on the RIS Variations**

**C1 - Pain relief for all spaying** – Spaying is currently a veterinary only procedure in Victoria. Veterinarians should use their professional judgment as to whether pain relief is required for the DOT.

**C2 – Banning flank spaying** - Veterinary only procedure in Victoria. DEPI supports S6.8 (use of pain relief for flank spaying)

**C3- Banning permanent tethering** – There are few cattle which would be permanently tethered in Victoria. Victoria has a Code of Practice for tethering. No strong support either way for the banning of permanent tethering. This is a matter that DEPI are comfortable for industry to decide.

**C4 – Banning the use of dogs on calves** – DEPI supports the banning on use of dogs on calves less than 30 days old which are separated from the cow. The *Land Transport Standards* (SB4.9) prohibits the use of dogs during the transport process, which includes mustering and assembling of bobby calves. Current Code of Practice for cattle welfare states the use of dogs on bobby calves is an unacceptable practice.

**C5 - Banning caustic dehorning** – The use of caustic chemicals for disbudding calves is not allowed under the current COP for cattle, however DEPI will support the use of caustic chemicals for dehorning as long as the operator conforms with the constraints within S6.5 and products used are registered for that purpose by the AVPMA.

**C6 – Banning induction of early calving except for vet requirements** – DEPI supports the adoption of alternative herd management strategies to minimise or eliminate the need for induction of early calving. DEPI supports the phasing out of early calving induction, however the procedure should remain available for treatment of individual cows under direct veterinary treatment.

**C7 – Banning electro-immobilisation** – Electro-immobilisation is currently prohibited in Victoria under POCTA legislation and will remain prohibited in Victoria.

### **Suggested amendments to the proposed standards and guidelines**

Suggested amendments to the standards and guidelines in the below table are in red text, with additional suggestions, comment and rationale in the right hand column.

There are several important issues requiring amendment such as proposed guidelines, which in DEPI Victoria's opinion must be upgraded to standards to address welfare issues and avoid conflict with current cruelty offence legislation under the Victorian *Prevention of Cruelty to Animals Act* (POCTA). These comments and suggested amendments are repeated in the below table.

Regarding the standards for feed and water, DEPI Victoria suggests there is an opportunity to improve these contemporary industry welfare standards by the inclusion of a standard which specifies a minimum mob average body condition score for each class of cattle. Below these average condition scores would be considered cruelty.

**S2.1** - feed and water standard should be split into separate standards. Daily access to water should be a standard (with exceptions for assembling for husbandry procedures and/or transport. See comments for G2.10 in table. A maximum time off water standard may apply. This on-farm time should be less than the maximum allowed for transport, but certainly no more.

DEPI Victoria supports **S3.3** "A person in charge must ensure appropriate treatment or humane killing for sick, injured or diseased cattle at the first reasonable opportunity". **However there is conflict with the following guidelines.** These guidelines as they are proposed, are in conflict with cruelty offences within Victoria's POCTA legislation.

- **G3.11** "Downer cattle should be assessed and treated without delay" – This guideline is a replication of S3.3 and must either be removed, or made a separate standard. Failure to provide treatment is cruelty under our POCTA Act
- **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 must be a standard or deleted as a guideline as the issue is captured in S3.3 and failure to treat is a POCTA offence.
- **G7.6** "Weak or orphan calves with very little chance of survival should be humanely killed". This should be a standard (as per S3.3 & S11.3

- **G7.9** “Cows subject to an induction program should be inspected twice daily. Any cow requiring calving assistance or treatment should receive this at the first opportunity”. The second part of this guideline must be a standard – “Any cow requiring assistance or treatment must ...” or deleted otherwise in conflict with S3.3 and is An offence under POCTA Act.

In line with the “competency” standards for castration, dehorning, spaying etc, DEPI suggest a new standard be included in Section 7 – Breeding Management - “A person performing artificial breeding on cattle must have the relevant knowledge, skills and experience or be supervised by a person who has the relevant knowledge, skills and experience”.

**G3.8** Administration of treatments and vaccines should be a standard- must be administers as per manufacturer’s directions, and therefore state Ag & vet chemical control of use legislation and records kept under LPA.

**G4.4** and **G4.12** should be standards to be consistent with other species standards as indicated in the table below.

**S5.2** – “A person must not drive cattle to the point of collapse”. To the point of “collapse” could likely be deemed cruelty under POCTA legislation. Suggest replace “collapse” with “exhaustion”. These are welfare standards, not cruelty legislation.

**G7.12** “The welfare of teaser cattle used in bull serving ability tests should be closely monitored”. This should be a standard with the addition of ...for distress or injury during and after the procedure and treated as necessary.

Whilst still allowing the practice of serving ability testing, consideration should be given to whether serving capacity testing should be banned,

**G8.1** should be a standard. Suggest - “A person in charge must ensure a calf removed from a cow at birth receives adequate colostrum within 12 hours of birth, alternatively the calf must be killed within a reasonable time”. This is consistent and in line with S7.4.

**G8.11** “Calves that become sick should be segregated and treated immediately”. The “treatment” should be a standard (to align with S3.3) or be deleted otherwise in conflict with S3.3. The segregation of the calf should remain a guideline.

**G10.8** “Heavily pregnant cattle should be transferred to a pen with lower stocking density or paddock before calving” should be a standard

**G10.9** – “Calves born in feed yards should be segregated with the mothers or humanely killed. This should be a standard.

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DEPI Victoria supports the recommendations of Dr Tristan Jubb with respect to diagrams for recommended aiming position for captive bolts / firearms and for monitoring for signs of life.

Ref No.	Standard / Guideline	Comments / Suggestions
<b>1. Responsibilities</b>		
S1.1	A person must take reasonable actions to ensure the welfare of cattle under their care.	<p>Where is the duty of care in this? This standard should be worded as “A person who is responsible for cattle has a duty of care to ensure the welfare of those cattle.”</p> <p>Duty of care includes taking reasonable actions such as those listed in G1.1</p>
G1.1	<p>Elements of responsibility for, <b>and competency in</b> cattle management should include:</p> <ul style="list-style-type: none"> <li>• understanding the standards and guidelines for cattle welfare</li> <li>• obtaining knowledge of relevant animal welfare laws</li> <li>• understanding cattle behaviour</li> <li>• planning and undertaking actions for the enterprise to meet the welfare standards and address contingencies that may arise</li> <li>• assessing the quantity, quality and continuity of feed and water supply</li> <li>• handling to minimise stress, and using handling aids, facilities and other equipment appropriately</li> <li>• undertaking hygienic practices for husbandry procedures in a manner that minimises the risks to cattle welfare</li> <li>• understanding and following chemical and drug treatment instructions for cattle</li> <li>• identifying distressed, weak, injured or diseased cattle and taking appropriate action</li> </ul>	This is also list of elements of competency

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	<ul style="list-style-type: none"> <li>maintaining appropriate records</li> <li>humanely killing cattle by appropriate methods, or seeking the assistance of someone who is capable and equipped to kill them humanely.</li> </ul>	
G1.2	Agistment responsibilities should be documented, communicated and clearly understood by <del>both</del> all parties involved.	All parties rather than only “both” as there may be more than two parties involved (land owner, manager, livestock owner, agents). Ensures capture those responsible for the animals.
G1.3	Owners, managers, and stockpersons should have an appropriate staff induction program, periodically review existing practices, and be aware of new developments and training relevant to the welfare of cattle.	
<b>2. Feed And Water</b>		
S2.1	A person in charge must ensure cattle have reasonable access to adequate <b>quantity and quality of</b> appropriate feed and <b>daily access to water sufficient to maintain good health and vitality.</b>	<p><b>These standards should go further and specify a minimum average body condition score for each class of cattle.</b></p> <p>S2.1 could be split into separate standards for feed and for water. Suggest include daily access to water. – These standards should have <b>a maximum time off water for on-farm</b> which should be less than then times for allowed during transport, but certainly no more.</p> <p><b>These are meant to be contemporary industry animal welfare standards.</b></p>
G2.1	Feed supply for cattle should minimise harmful metabolic and nutritional conditions, and be based on: <ul style="list-style-type: none"> <li>body weight, and/or fat/body condition score</li> <li>extra demands associated with growth, pregnancy, lactation and exercise</li> <li>prevailing / predicted weather conditions.</li> </ul>	

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G2.2	Regular assessment should be made of the needs of the cattle in relation to the quantity and quality of feed and water, <b>to ensure an adequate supply.</b>	This should be a standard. The “frequency” of assessment will depend on risk. Add the following “.... , to ensure an adequate supply”
G2.3	Stocking rates and /or feed supplementation should be managed to maintain cattle in appropriate body condition.	As this is a guideline, it would be good to be more specific on recommended body condition scores for different classes of cattle.
G2.4	Feed supplements should be carefully assessed for suitability and safety, <b>to meet the dietary requirements of the cattle.</b>	Add the following- “ .... , to meet the dietary requirements of the cattle
G2.5	Major changes in diet should be introduced over an appropriate length of time and closely monitored for any new supplement, <b>particularly those involving cereal grain or grain based pellets.</b>	Add ... for any new supplement, particularly those involving cereal grain / pellets
G2.6	Shy feeders should be identified and managed appropriately.	
G2.7	Cattle access to contaminated and spoilt feed, toxic plants and harmful substances should be avoided or managed.	Add another line - “Persons purchasing stock feed should ensure the feed doesn’t contain contaminants or harmful substances”.
G2.8	Self-feeders should be checked, cleaned and maintained regularly.	
G2.9	An appropriate fat/body condition score system should be used as a guide for the monitoring and planned feeding of cattle.	As per comment for S2.1 and G2.3; as a minimum, there should be more specific guidance for ideal condition score for the various classes of cattle or reference to industry information.
G2.10	Cattle <b>must should</b> have reasonable access to water <b>of an appropriate quality and quantity</b> at least daily.	<b>As per comment on S2.1 – Daily access to water should be a standard, (with the exception for assembling for yarding &amp;/or transport).</b>
G2.11	Lactating cows, and all cattle in hot weather, should have access to water at least twice daily.	

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G2.12	Calves removed from cows should have access to water at all times.	
G2.13	Where the water quality is known to be variable, it should be monitored regularly for harmful substances and managed to protect cattle welfare.	
G2.14	Water infrastructure should be inspected and maintained to allow effective provision of water in a reasonable time.	Assume “reasonable time” relates to the trough refilling time (ie water flow rate). May need to clarify wording so that people can not confuse frequency of inspection with reasonable time for re-filling troughs.
G2.15	Medicated water systems should be closely monitored to ensure cattle are not overdosed.	
G2.16	Assessment of water requirements for construction of cattle watering facilities should consider: <ul style="list-style-type: none"> <li>• daily requirements and total annual requirement</li> <li>• flow rates needed for peak, short-term demand</li> <li>• <del>constructed to</del> prevention of temperature build up when planning construction.</li> </ul>	Change last point to ‘prevention of temperature build up when planning construction’ or similar to be consistent with leading sentence.
G2.17	Calves should receive adequate colostrum within 12 hours of birth, with the first feed occurring as soon as possible.	
G2.18	Weaned calves should be provided with appropriate energy and protein supplements.	
<b>3. Risk Management of extreme weather, natural disasters, disease, injury &amp; predation</b>		Should consider inclusion of a guideline for carcase disposal. Although carcase disposal is generally a management issue, it may lead to animal welfare issues if carcasses are left in-situ.
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.	

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S3.2	A person in charge must ensure the *inspection* of cattle at intervals and at a level appropriate to the production system and the risk to the welfare of cattle.	
S3.3	A person in charge must ensure appropriate treatment or humane killing for sick, injured or diseased cattle at the first reasonable opportunity.	This standard is fine, but <b>there are a number of proposed guidelines which are in conflict with this standard and cruelty legislation - G3.11, G7.5, G7.6 &amp; G7.9</b>
G3.1	<p><b>Contingency</b> plans to minimise risks to cattle welfare should include preparation for :</p> <ul style="list-style-type: none"> <li>• emergency contact details</li> <li>• breakdown or mechanical failure affecting feed, water, ventilation or milking</li> <li>• adverse weather - specifically, conditions that predispose cattle to heat or cold stress</li> <li>• flood and fire</li> <li>• insufficient supply of feed or water</li> <li>• disease outbreak or injury</li> <li>• emergency killing and disposal</li> <li>• other issues specific to the <b>type of</b> enterprise or cattle being managed.</li> </ul>	<p>This list mostly contains potential issues. Including ‘emergency contact details’ as the first point seems incongruous.</p> <p>Change lead sentence to: “Contingency plans to minimise risks to cattle welfare should include preparations for</p>
G3.2	<p>Drought strategies should be prepared in advance and then progressively implemented before paddock feed runs out, and may include:</p> <ul style="list-style-type: none"> <li>• supplementary feeding</li> <li>• <b>progressive destocking</b></li> <li>• relocation, sale or agistment</li> <li>• use of stock containment areas</li> <li>• segregation according to risk</li> </ul>	<p>Change to: “Potential strategies may include:”</p> <p>Move the supplementary feeding to the first dot point as it’s usually the first action that taken.</p> <p>Include “progressive destocking” in plan as a dot point</p>

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	<ul style="list-style-type: none"> <li>• early weaning</li> <li>• humane killing.</li> </ul>	
G3.3	If practical, cattle should be provided with adequate shelter appropriate to the class of cattle, to minimise risks to welfare during inclement weather.	No need to include “if practical, as this is a guideline, not a standard. Include “appropriate to the class of cattle”
G3.4	Cattle handling should be minimised during extremely hot weather.	
G3.5	Unexplained disease and deaths should be investigated to formulate appropriate remedial and preventative actions.	This is a biosecurity issue and will be captured as a standard in future biosecurity standard. Therefore should be considered as a standard, otherwise will conflict later. Some state livestock disease control legislation mandates reporting of unusual and/or notifiable diseases.
G3.6	Appropriate veterinary advice on cattle disease diagnosis, prevention or treatment should be sought as required.	
G3.7	Cattle should be vaccinated to protect against likely preventable infectious diseases if there is a sufficient risk to the welfare of cattle.	Replace “likely” with “preventable” and delete reference to sufficient risk to the welfare of cattle. This is a guideline, not a standard.
G3.8	Treatments and vaccines must should be administered in accordance with the manufacturer’s directions. Records of treatments should be kept.	Should be a standard to be consistent with state Ag & Vet Chemical control of use legislation. Record must be kept under LPA rules. Insert “the manufacturer’s”
G3.9	Consideration should be given to selecting cattle that are suitable for and adapted to the production environment, and that are resistant to parasites and specific diseases relevant to the environment.	
G3.10	Internal and external parasites should be monitored and controlled.	

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G3.11	<del>Downer cattle <b>must</b> be assessed and treated without delay.</del>	<b>This guideline is a replication of S3.3. and should be deleted. As a guideline, it is in conflict with S3.3 and cruelty legislation.</b>
G3.12	Predator control programs should be implemented where predation is a significant risk to the welfare of cattle.	
<b>4. Facilities and equipment</b>		
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.	This standard is unenforceable as it is worded.
G4.1	Facility construction or modification should take into account the following: <ul style="list-style-type: none"> <li>• cattle behaviour</li> <li>• topography (location and drainage)</li> <li>• flood and fire risk</li> <li>• climate</li> <li>• purpose / length of confinement</li> <li>• space</li> <li>• feed and water space requirements</li> <li>• shade / shelter</li> <li>• surface materials</li> <li>• cleaning and waste disposal.</li> </ul>	Include ventilation
G4.2	Passage ways, races and entrances should be designed to take advantage of cattle behaviour and to reduce stress during movement through facilities. Visual barriers should be used as appropriate. Changes in levels, poor lighting, narrow or uneven passages and awkward turns should be avoided.	
G4.3	The surfaces of yards, pens, tracks and laneways should be constructed and maintained to minimise the risk of <b>injury</b> , lameness, slips and falls.	This is an extension of S4.1

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G4.4	Facilities <b>must should</b> be free from protrusions and obstacles that may cause injury.	<b>This should be a standard. Otherwise it is in conflict with S4.1 and also SA3.1(iv) of the Land Transport Stds.</b>
G4.5	Water sprinklers should be used to reduce dust levels and provide cooling during handling in yards as appropriate.	
G4.6	Faeces and urine accumulations should be removed regularly.	
G4.7	Housed systems <b>should</b> have hospital pens with a comfortable lying surface for sick or injured cattle, and the means by which to move downer cows to the hospital pen.	The Pig Welfare Standards (pig code) mandate a hospital pen for indoor facilities. This should be a standard
G4.8	A normal diurnal pattern of lighting should be provided for indoor cattle.	
G4.9	Cattle should have opportunity for appropriate exercise each day.	
G4.10	Air should be of acceptable quality with respect of dust, chemicals and smells. Continuous periods of detectable smoke should be avoided.	Should be a standard for housed systems
G4.11	Concrete flooring in rest areas should be covered by an appropriate depth of bedding material.	
<b>G4.12</b>	Fire alarms and adequate fire fighting equipment <b>must should</b> be fitted and maintained in all indoor housing systems.	<b>This should be a standard.</b> It is a standard in the Pig Welfare Standards (pig code).
<b>5. Handling and husbandry</b>		
S5.1	<p>A person must handle cattle in a reasonable manner and must not:</p> <ol style="list-style-type: none"> <li>1) *lift* off the ground by only the head, ears, horns, neck, or tail, unless in an emergency; or</li> <li>2) throw or drop, except to land on its feet; or</li> <li>3) strike in an unreasonable manner, punch or kick; or</li> <li>4) drag cattle that are not standing, except in an emergency for the minimum</li> </ol>	<p>“lift an individual by the head, ears, horns, neck or tail, unless in an emergency;” seems like a simpler sentence. “throw or drop an individual, except to land safely on its feet” – not every animal landing on its feet will land without injury</p> <p>“deliberately or recklessly dislocate or break the tail of cattle”= aggravated cruelty. Replace with “twist or handle a cow’s tail in such a way that is likely to cause injury to the cow” reckless injury without intent to harm should be penalised</p>

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	<p>distance to allow safe handling, *lifting*, treatment or humane killing; or</p> <p>5) <b>twist or handle a cow’s tail in such a way that is likely to cause injury to the cow</b> (<del>deliberately or recklessly dislocate or break the tail of cattle</del>); or</p> <p>6) <b>fire use-metal pellets at cattle to wound</b> as an aid to mustering.</p>	Delete “wound” in point 6 – to wound is a cruelty offence.
S5.2	A person must not drive cattle to the point of <b>exhaustion collapse</b> .	To the point of collapse would be deemed “cruelty” – replace with “exhaustion”. Also refer to G5.7
S5.3	<p>A person must consider the welfare of cattle when using an electric prodder, and must not use it:</p> <p>1) on genital, anal, udder or facial areas of cattle; or</p> <p>2) on calves less than three months old, <b>unless their welfare is at risk</b>; or</p> <p>3) on cattle that are unable to move away; or</p> <p>4) in an unreasonable manner on cattle.</p>	<p>Remove “unless their welfare is at risk”</p> <p>A person cannot use an electric prodder on calves in Victoria under POCTA Act.</p> <p>(Other options are available for moving calves during the dipping cows &amp; calves).</p>
S5.4	A person in charge must have a dog *under effective control* at all times during handling of cattle.	
S5.5	A person in charge must ensure a dog is muzzled when moving calves less than 30 days old that are without cows.	
S5.6	A person in charge must ensure cattle are accustomed to tethering before they are tethered for long periods. A person in charge must ensure tethered cattle are able to exercise daily.	<p>Could separate into two standards.</p> <p>Is walking around on a tether deemed “exercise”? If tethering is retained, this standard should be clear as to whether the animal needs to be released from the tether for exercise and for how long per day.</p>

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S5.7	<p>A person must only use *electro-immobilisation* on cattle if:</p> <ol style="list-style-type: none"> <li>1) the device is approved for use in the jurisdiction; and</li> <li>2) the cattle are over six months old; and</li> <li>3) the operator is trained or it is done under *direct supervision* of a veterinarian or a trained person; and</li> <li>4) alternative restraining methods are not adequate to hold cattle sufficiently for the Procedure being performed.</li> </ol>	<p>Electro-Immobilisation is banned in Victoria under POCTA Act.</p> <p>E-IO “training” should be specified in definitions.</p>
S5.8	<p>A person must not use *electro-immobilisation* on cattle as an alternative to *pain relief*.</p>	
S5.9	<p>A person must use appropriate methods and techniques to identify cattle that are applicable to the production system.</p>	<p>This is a very vague standard (not even a useful guideline) – of little to no value as it stands. Best left for future traceability standards to mandate identification.</p>
S5.10	<p>A person must not place a permanent brand on the head of cattle.</p>	
G5.1	<p>Cattle should be handled quietly and calmly, taking into account their flight zone and natural herding instinct to minimise stress during handling. Allowances should be made for cattle with special needs such as young calves, lame cattle and bulls.</p>	
G5.2	<p>Calves should be weaned in an appropriate and secure area. Calves should be subjected to a handling training program so calves become accustomed to regular handling practices.</p>	
G5.3	<p>Under paddock or extensive systems, the frequency of inspection should take into consideration:</p> <ul style="list-style-type: none"> <li>• feed availability</li> <li>• water supply</li> <li>• age</li> <li>• class</li> <li>• pregnancy status</li> <li>• weather</li> </ul>	

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	<ul style="list-style-type: none"> <li>• disease risk</li> <li>• predator risk</li> <li>• recent management procedures.</li> </ul>	
G5.4	The degree and duration of restraint for cattle should be the minimum necessary to allow a procedure to be done efficiently and safely.	
G5.5	Handling aids such as drafting canes, flappers, flags, rattles or other noise makers should be used in preference to other strike objects to move cattle.	
G5.6	Use of dogs and electric prodders should be limited to the minimum amount necessary.	
G5.7	Cattle being moved <b>must should</b> be rested or allowed to slow if they show signs of exhaustion.	Refer to suggested change to S5.2. Must be rested if showing signs of exhaustion (before collapse)
G5.8	Calves under 30 days old should be handled with care as they may not have developed following behaviours and may also become easily fatigued.	
G5.9	Cattle should be returned to feed and water as soon as possible after holding in yards.	
G5.10	Wounds <b>should</b> be treated as soon as practicable to prevent infection and flystrike.	Would be deemed cruelty if not treating large wounds
G5.11	Cattle <b>must should</b> be closely supervised when dipping to prevent drowning.	Should be a standard
G5.12	Care should be taken when drenching cattle to avoid causing <b>aspiration inhalation</b> of the drench or bolus, and damage to the mouth and throat.	Considering replacing “inhalation” with “aspiration”
G5.13	Hoof paring should <b>be limited to</b> avoid damage to soft horn tissue.	
G5.14	Permanent tethering should be avoided	
G5.15	Instruments should be maintained and in good working order.	
G5.16	Post-operative herd management should ensure effective mothering-up of calves at foot after the procedure is completed.	
G5.17	Unnecessary cattle handling should be avoided during extreme weather.	Very similar to G3.4 – consider consolidating.
G5.18	Cattle should have sufficient time to become aware of electric fences, <b>and have sufficient</b> space to move away <b>from the fence.</b>	

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G5.19	Insect <b>worry irritation</b> should be managed by implementing control measures where appropriate	Insect “worry” seems like a very vague and colloquial term. Maybe replace “worry” with “irritation”
G5.20	Any benefits from using electro-immobilisation on cattle should be judged against its aversive effects.	
G5.21	The lowest setting of current for electro-immobilisation that produces restraint should be selected.	
G5.22	Operators using electro-immobilisation <b>must should</b> undertake formal training and assessment to a high level of competency.	This guideline conflict with S5.7 (3) which states the operator must be trained or supervised by a trained person. Need def’n of required training.
G5.23	Electro-immobilisation should not be used for routine procedures as a substitute for feasible upgrading of handling facilities.	
G5.24	Hot iron branding of wet cattle should be avoided.	
G5.25	The correct time period of application and temperature of the iron should be used when hot iron branding.	Should the guidelines give more info on this?
G5.26	Hot iron branding of weak or extremely thin cattle <b>must not be practiced should be avoided.</b>	Branding debilitated cattle would likely be deemed cruelty
G5.27	Care should be taken with the concurrent application of volatile pour-on treatments when hot iron branding or applying <b>an the</b> electric prodder.	Replace ‘the’ with “an”
G5.28	Ear tagging and tattooing should be done in a manner that minimises the risk of infection and tearing the ear.	
G5.29	Ear marking and tattooing instruments should be sharp and clean with relevant hygienic precautions followed.	Align with G5.15?
<b>6. Castration, dehorning and spaying</b>		
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.	
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	

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	age is approved in the jurisdiction.	
S6.3	A person must use appropriate tools and methods to *castrate* cattle.	
S6.4	A person in charge must use *pain relief* when *dehorning* unless cattle are: <ol style="list-style-type: none"> <li>1) under six months old; or</li> <li>2) under 12 months old if at their first *yarding* and where the later age is approved in the jurisdiction.</li> </ol>	
S6.5	A person must consider the welfare of the calf when using *caustic chemicals* for disbudding, and must only use it if the calf: <ol style="list-style-type: none"> <li>1) is under fourteen days old; and</li> <li>2) can be segregated from its mother <b>and other calves</b> for four hours after treatment; and</li> <li>3) can be kept dry for 12 hours after treatment; and</li> <li>4) is not wet.</li> </ol>	This method was previously disallowed in the Code of Practice. DEPI Victoria supports the use of caustic chemicals with these constraints, and products used are registered for that purpose with the APVMA.
S6.6	A person must use appropriate tools and methods to *dehorn* cattle and *disbud* calves.	
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 veterinarians can spay cattle in Victoria
S6.8	A person in charge must use *pain relief* when performing the *flank approach* for *spaying* or *webbing* of cattle.	
S6.9	A person must not use vaginal spreaders to *spay* small or immature female cattle.	
G6.1	Surgical procedures should only be done if there are no alternatives and the procedure results in either: <ul style="list-style-type: none"> <li>• life-time benefits to cattle welfare, or</li> <li>• better herd management, or</li> <li>• a reduced work health and safety risk, <b>where there is no other practical alternative.</b></li> </ul>	Assume “surgical procedure” refers to castration, dehorning & spaying
G6.2	Surgical procedures should be done with pain relief. Operators should seek advice on current pain minimisation strategies.	

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G6.3	Surgical procedures should be planned with consideration <del>of</del> <b>to</b> the health and age of cattle, weather, staff availability and facilities including the use of temporary or permanent yards.	
G6.4	Good hygiene practices <b>must should</b> be implemented in relation to facilities, hands, handling and instruments. Disinfectant should be used and changed frequently.	Suggest first part should be a standard with respect to surgical and husbandry procedures.
G6.5	Effective but not excessive restraint should be used to minimise movement, and to enable the procedure to be done quickly and efficiently.	
G6.6	Equipment for restraining cattle should only be used: <ul style="list-style-type: none"> <li>• for the minimum time necessary with the minimum restraint necessary, when it is suitable</li> <li>• if it is in good working order.</li> </ul>	
G6.7	Calves should be separated from mothers for the shortest possible time unless they are to be hand reared or weaned onto a solid diet.	
G6.8	Bleeding from surgical wounds should be minimised by selection of method, preventing overheating of calves and allowing them to settle after mustering.	
G6.9	Infection should be minimised by <b>avoiding performing surgical procedures in</b> muddy or dusty yards, and wet weather.	Insert ...'avoiding performing surgical procedures in' muddy....
G6.10	Surgical procedures should not be done during extreme weather.	
G6.11	Cattle <b>should</b> be inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken <b>if necessary</b> .	Should be considered a standard Add "...if necessary".
G6.12	Cattle to be castrated or made cryptorchid should as young as possible (less than 12 weeks of age) and the procedure should be done before the cattle are weaned.	
G6.13	Calves <b>should</b> be more than 24 hours old when castrated.	Should be considered a standard
G6.14	Calves less than two weeks old should be castrated by the rubber-ring method in preference to the cutting method.	
G6.15	Calves more than two weeks old should be castrated by cutting methods in preference to the rubber-ring and tension-band methods.	
G6.16	Use of rubber rings or tension bands on calves should ensure that the correct position and tension is achieved for blockage of the arterial blood flow.	

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G6.17	The incision for surgical castration should be of sufficient size, and extend to the base of the scrotum, to allow effective drainage and reduce risk of infection.	
G6.18	Preference should be given for breeding of naturally polled cattle.	
G6.19	Disbudding should be done in preference to dehorning.	
G6.20	Hot-iron cautery should be used in preference to excision methods for disbudding calves.	
G6.21	Calves should be disbudded or dehorned as young as possible.	
G6.22	The hair around horn buds should be clipped before use of caustic chemicals for disbudding.	
G6.23	Tipping should only remove a solid, non-vascular portion of the horn, and result in a blunt horn end.	
G6.24	Horn regrowth or a scur that has a blunt horn end should not be dehorned or tipped, <b>unless the horn is in-growing or likely to cause the animal injury or distress.</b>	Insert unless the horn is in-growing or likely to cause the animal injury or distress.
G6.25	The dropped ovary technique (DOT) for cattle spaying should be used in preference to other surgical methods, <b>where possible.</b>	Do not require “where possible” as it is a guideline.
<b>7. Breeding management</b>		
S7.1	A person performing *artificial breeding procedures* on cattle must take reasonable actions to minimise pain, distress or injury.	<b>Suggest a new standard in addition to S7.1 – <i>A person performing artificial breeding on cattle must have the relevant knowledge, skills and experience or be supervised by a person who has the relevant knowledge, skills and experience.</i></b>
S7.2	A person in charge must ensure the *inspection* of calving cattle at intervals appropriate to the production system and the level of risk to the welfare of cattle.	Although this standard relates to calving cattle, all cattle must be inspected at intervals appropriate to the system & risk...
S7.3	A person in charge must ensure *calving induction* is done under veterinary <b>supervision</b> <del>advice.</del>	Replace “advice” with “supervision DEPI supports the phasing out of early calving induction, with the procedure remaining available for treatment of individual cows under direct veterinary supervision.

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S7.4	A person in charge must ensure that induced calves receive adequate colostrum or be humanely killed at the first reasonable opportunity, and before they are 12 hours old.	
G7.1	<b>Technicians</b> responsible for breeding management should have an understanding of the reproduction and behaviour of both the cow and the bull.	Replace “Technician’ with “Persons” or “Those” . Guideline becomes redundant if include suggested new standard requiring person performing artificial breeding to have the relevant knowledge, experience & skills....
G7.2	In the last 4-6 weeks of pregnancy, management practices should minimise stress on cows and reduce <b>the risk</b> of metabolic diseases.	Insert “the risk” of metabolic diseases
G7.3	Calving should occur in a sheltered and well drained area where surveillance is possible. Unless birthing assistance is required, disturbance of cows should be avoided.	
G7.4	Care should be taken to minimise calving difficulties by the adoption of management practices, which may include: <ul style="list-style-type: none"> <li>• selection of heifers for mating only when they have reached the minimum target weight for the breed</li> <li>• avoidance of over-or under-feeding pregnant cows and heifers</li> <li>• avoidance of mating heifers to bulls known to sire large birth weight calves</li> <li>• supervision of cows and heifers close to calving where possible, and early intervention if required</li> <li>• selecting bulls rated for calving ease <b>and structure</b>.</li> </ul>	Change order of dot points (to align themes) <ul style="list-style-type: none"> <li>• selection of heifers for mating only when they have reached the minimum target weight for the breed</li> <li>• selecting bulls rated for calving ease <b>and structure</b></li> <li>• avoidance of mating heifers to bulls known to sire large birth weight calves</li> <li>• avoidance of over-or under-feeding pregnant cows and heifers</li> <li>• supervision of cows and heifers close to calving where possible, and early intervention if required</li> </ul>
<b>G7.5</b>	Cows that receive severe injuries during calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) <b>must should be provided with receive</b> urgent treatment or be humanely killed without delay.	<b>This must be a standard or delete as a guideline as the issue is captured in S3.3</b> (as per downer cows). It is in conflict with cruelty offence legislation.

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G7.6	Weak or orphan calves with very little chance of survival <b>must should</b> be humanely killed.	<b>This should be a standard (as per S3.3 &amp; S11.3. Cruelty if left to suffer.</b>
G7.7	A cow's body condition should be considered when deciding when to wean the calf.	
G7.8	Herd management strategies should be adopted to minimise or eliminate the need for induction of calving.	
G7.9	Cows subject to an induction program should be inspected twice daily. Any cow requiring calving assistance or treatment <b>must should</b> receive this at the first opportunity.	<b>The second part of this guideline should be a standard (as per S3.3) or deleted otherwise in conflict with S3.3</b>
G7.10	Calving induction should only be done when necessary for the welfare of the individual cow or calf.	As per <b>RIS variation C6</b> , DEPI supports the phasing out of early calving induction, however the procedure should remain available for treatment of individual cows under direct veterinary treatment.
G7.11	Bulls should be checked at regular intervals for injuries and disease <b>during the joining period.</b>	Assume the focus of this guideline is “during the joining period”. Why are we distinguishing bulls from cows. Cows can be injured or diseased .
G7.12	The welfare of teaser cattle used in bull serving ability tests <b>must should</b> be closely monitored <b>for distress or injury during and after the procedure and rested or treated as necessary.</b>	<b>This should be a standard</b> with the addition of the following “ .... <i>monitored for distress or injury and treated as necessary</i> ”..  Consideration should be given to whether serving capacity testing should be banned, while still allowing serving ability testing.
<b>8. Calf-rearing systems</b>		<b>Need to emphasis this section includes bobby calf management, not just replacement calves</b>  Consider including all the calf related standards in this section
S8.1	A person in charge must ensure the <b>daily</b> feeding and *inspection* of calves in calf rearing systems <b>daily.</b>	Require daily feeding & inspection. Current wording may imply the person in charge has to ensure on a daily

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		basis that the practice of feeding a& inspection is occurring.
S8.2	A person in charge must ensure calves that are housed in pens can turn around, lie down and fully stretch their limbs.	
S8.3	A person in charge must ensure sufficient iron in the diet to prevent anaemia in calves in veal production systems.	
S8.4	A person in charge must not allow the faeces and urine of calves housed in indoor systems to accumulate to a level <del>the stage</del> that compromises calf health and welfare.	Replace “the stage” with “a level”
G8.1	Calves removed from cows <del>must should</del> receive adequate colostrum within 12 hours of birth, with the first administration occurring as soon as possible.	<b>This should be a standard similar to S7.4 - “A person in charge must ensure a calf removed from a cow at birth receives adequate colostrum within 12 hours of birth, (unless the calf is killed within this timeframe)”. Adequate = at least 2 litres colostrum</b>
G8.2	The quality of colostrum should be checked if in doubt.	
G8.3	Where feeding of new-born calves is required, the calves <del>must should</del> be supervised until they are successfully trained to feed.	Should be a standard
G8.4	Where a cow is being restrained to suckle or adopt an orphan calf, the cow should be observed to ensure timely evaluation that the cow is not becoming distressed and that the calf is sucking.	
G8.5	Calves should be grouped by size and age to reduce competition, and facilitate observation and management.	
G8.6	Where there are two or more calves on a property, a person <del>should</del> ensure calves housed in single pens are able to see neighbouring calves.	Should be a standard
G8.7	Calves should be kept in the company of other calves from three weeks of age.	
G8.8	Liquid feed should be fed at the appropriate temperature.	
G8.9	Solid feeds should be gradually introduced. Roughage should be provided to encourage the development of the rumen function from three weeks of age.	
G8.10	Feeding equipment <del>should</del> be hygienically maintained.	Should be a standard

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G8.11	Calves that become sick should be segregated and treated immediately.	The treatment must be a standard (to align with S3.3) or be deleted otherwise in conflict with S3.3. The segregation of the calf should remain a guideline.
G8.12	Floor area of 1.5 to 2.0 m <sup>2</sup> should be provided for each calf in group pens to permit self-grooming and prevent overcrowding. 2.0m <sup>2</sup> should be provided for calves in individual pens.	Minimum floor space should be a standard
G8.13	Calves should be raised in an environment that is: <ul style="list-style-type: none"> <li>• clean</li> <li>• dry</li> <li>• well drained</li> <li>• provided with sufficient bedding</li> <li>• draught free and well ventilated</li> <li>• free of projections that may cause injury.</li> </ul>	Dry & clean environment should be a standard in an housed calf rearing facility.  Add new guideline - should clean & disinfect calf rearing area routinely / between batches
G8.14	Action to protect against extremes of hot or cold weather should be commenced as soon as it is expected that conditions will deteriorate.	Action should be taken prior to the expected deterioration
G8.15	<del>Very early weaning of calves should be supported by a high protein diet.</del> Early weaned calves should be fed an appropriate diet high in protein.	Suggest re-wording “Early weaned calves should be fed an appropriate diet high in protein”.
<b>9. Dairy Management</b>		
S9.1	A person in charge must ensure the daily *inspection* of lactating dairy cows.	Should the “inspection” prescribe what we want inspected / monitored, eg inspected for health and wellbeing?
S9.2	A person in charge must implement appropriate actions to minimise *heat stress* of cattle.	
S9.3	A person must not only *tail dock* cattle except on veterinary advice and only to treat injury or disease.	Reword for easy clarity

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S9.4	A person in charge must ensure dairy cattle that are kept on feed pads for extended periods have access to a well-drained <b>and dry</b> area for resting.	The use of the term “Feedpad” is too specific / narrow. Consider inclusion of “freestall barns” and “dairy feedlots”. Need to seek clarification for wording from the dairy sector
G9.1	Milking machinery and equipment should be regularly tested and maintained.	
G9.2	Milking technique 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.	
G9.4	Lameness assessment and/or hoof inspections should be conducted regularly and hoof trimming carried out when necessary.	
G9.5	A mastitis management strategy should be implemented and should include practices for prevention, early detection and effective treatment.	Should be considered a standard for dairy farms
G9.6	During hot weather, access to drinking water should be available at all times.	
G9.7	Dairy operators should develop, document and implement routine management procedures to reduce the excessive heat load risks identified before they occur.	
G9.8	Extra teats should be expertly and hygienically removed <b>if deemed necessary</b> as soon as they can be identified.	Many dairy cows have additional teats that do not produce milk and pose little risk to the health of the animal if they are not removed. Suggest “.... removed if deemed necessary as soon ....”
G9.9	Calving in free stalls should be avoided.	This guideline needs a little more explanation to say that free stalls are part of a housed system and that cows showing signs of calving should be moved to a lower density part of the housed system.
<b>10. Beef feedlots</b>		Need clarification as to whether “Containment areas” which are generally used during drought feeding are covered under this section or not. Could specifically exclude containment area in definition of “beef feedlot”.

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S10.1	A person in charge must ensure a minimum area of nine m <sup>2</sup> per *Standard Cattle Unit* for cattle held in external pens.	
S10.2	A person in charge must ensure the diet composition and quantities fed are recorded and records maintained for the duration of the feeding period of each group of cattle.	
S10.3	A person in charge must ensure <b>appropriate and adequate quantity and quality</b> feed is available daily to cattle in the *beef feedlot*.	
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 to manage on-going heat load risk.	
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.	
S10.6	A person in charge must have a documented contingency plan in case of failure of feed or water supply and must implement appropriate actions in the event of feed or water supply failure.	
S10.7	A person in charge must have a documented contingency plan in case of an emergency animal disease and must implement appropriate actions in the event of an emergency animal disease.	
S10.8	A person in charge must ensure the daily *inspection* of all cattle within the feedlot.	
S10.9	A person in charge must ensure the appropriate management of calves born in the feed yards to ensure the welfare of the calves.	
S10.10	A person in charge must ensure the cleaning of feed yards and maintenance of surfaces on a planned basis to ensure that pen surfaces can drain freely.	Does this suitably cover muddy conditions in southern feedlots?
G10.1	Feedlots should be accredited under a third party audited quality assurance system.	
G10.2	Feedlot operators should document aspects of a beef feedlot management plan that is not already required to be documented in the standards including: <ul style="list-style-type: none"> <li>• Frequency of cleaning of the following facilities: <ul style="list-style-type: none"> <li>• feed yards</li> <li>• water troughs</li> <li>• feed troughs</li> </ul> </li> </ul>	Should also have a documented plan for the management of pregnant heifers and cows.

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	<ul style="list-style-type: none"> <li>• drains, sedimentation and holding ponds.</li> <li>• Detail of the records maintained and practices employed to manage the health of cattle held within the feedlot, including:             <ul style="list-style-type: none"> <li>• receival and induction</li> <li>• monitoring/inspection</li> <li>• disease or injury diagnosis and all treatments of cattle, including the method and records used to ensure the observance of withholding periods and/or export slaughter intervals for any chemical used</li> <li>• mortality and post mortems</li> <li>• biosecurity / disease risk mitigation measures.</li> </ul> </li> </ul>	
G10.3	All cattle should be seen standing and moving during daily inspections.	
G10.4	Bulling behaviour should be managed by segregation.	
G10.5	Cattle should be subjected to programs that enhance their capacity to adapt before entering the feedlot.	
G10.6	New arrivals to a feedlot should be closely inspected for injury and illness.	
G10.7	Horned cattle in the feedlot should only be tipped if horns are dangerous.	
G10.8	Heavily pregnant cattle <b>must should</b> be transferred to a pen with lower stocking density or paddock before calving.	Should be a Standard.
G10.9	Calves born in feed yards <b>must should</b> be segregated with their mothers or humanely killed.	Should be a Standard. Calves should be removed from feedlot
G10.10	Feed yard facilities should comply with the requirements of the National Beef Cattle Feedlot Environmental Code of Practice 2nd Edition, as amended or superseded.	Does this guideline relate to welfare?
G10.11	Stale or spoilt feed should be removed daily.	
G10.12	Changes in diet should be managed to minimise digestive upset to cattle.	

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G10.13	Daily feed consumption should be monitored.	
G10.14	Water troughs should be inspected daily and cleaned regularly.	
G10.15	Shy feeders should be removed to pens with a lower stocking density and/or fed a higher roughage diet.	
G10.16	Feedlot operators should manage heat load risk by observing the excessive heat load specific standards of the National Feedlot Accreditation Scheme.	Is this consistent with S10.5?
G10.17	Heat Load Risk Assessments should be documented and address the following criteria: <ul style="list-style-type: none"> <li>• site climatic factors for the feedlot location</li> <li>• animal factors including genotype, coat colour, days on feed and health status</li> <li>• management factors, which may include the provision of shade, provision of additional water troughs, water temperature, ration type and manure management practices</li> <li>• each class of cattle at the feedlot.</li> </ul>	Isn't this part of S5.2?
G10.18	Feedlot operators should develop, document and implement routine management procedures to reduce the excessive heat load risks identified before they occur. These proactive strategies should include: <ul style="list-style-type: none"> <li>• identification of at-risk cattle source regions and groups of cattle</li> <li>• specific selection of cattle for summer feeding programs</li> <li>• establishment and maintenance of facilities such as shade, sprinklers, weather stations and emergency watering troughs</li> <li>• implementation of summer diet and feeding programs</li> <li>• implementation of strategic pen cleaning programs</li> <li>• excessive heat load training and management of personnel</li> </ul>	

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	<ul style="list-style-type: none"> <li>implementation of monitoring programs of weather, cattle behaviour, Heat Load Index (HLI) and Accumulated Heat Load Units (AHLU) Index.</li> </ul>	
G10.19	<p>The Excessive Heat Load Action Plan should include the following minimum information/actions:</p> <ul style="list-style-type: none"> <li>name of the feedlot</li> <li>name and contact details of the person responsible at the feedlot</li> <li>name and contact details of the consulting veterinarian and nutritionist</li> <li>allocation of responsibilities to relevant personnel</li> <li>threshold for activation of the Excessive Heat Load Action Plan</li> <li>actions to manage the excessive heat load event and the welfare of animals at that time which may include: <ul style="list-style-type: none"> <li>monitoring of cattle, weather conditions, pen conditions, water and feed</li> <li>operational practices to be implemented for the management of cattle, pens, feed, water and personnel.</li> </ul> </li> </ul>	
<b>11. Humane killing</b>		
S11.1	A person in charge must ensure killing methods for cattle result in rapid loss of consciousness followed by death while unconscious.	
S11.2	<p>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 and skills, unless:</p> <ol style="list-style-type: none"> <li>the cattle are suffering and need to be killed to prevent undue suffering; and</li> <li>there is an unreasonable delay until direct supervision by a person who has the relevant knowledge, experience and skills is <b>available possible</b>.</li> </ol>	Replace “possible” with “available”

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S11.3	A person in charge of cattle suffering from severe distress, disease or injury that cannot be reasonably treated, must ensure the cattle are killed at the first reasonable opportunity.	
S11.4	A person killing cattle must <del>take reasonable action to</del> confirm the animal is dead.	Must confirm animal is dead
S11.5	A person killing a calf by a blow to the forehead must first ensure the calf is less than 24 hours old.	Awkward wording
G11.1	Recommended methods of humane killing include: <ul style="list-style-type: none"> <li>• for adult cattle — close range firearms use to the brain (<del>including the temporal position</del>) or captive bolt to the brain</li> <li>• for calves — firearms, captive bolt.</li> </ul>	Remove reference to the <b>temporal</b> position Update diagrams (refer to Tristan Jubb’s diagrams)
G11.2	The preferred option for humane killing should be a firearm directed to the frontal position of the head.	
G11.3	Three or more signs should be observed to determine whether the method used for humane killing has caused death. <i>Note:</i> Signs of death include: <ul style="list-style-type: none"> <li>• loss of consciousness and deliberate movement</li> <li>• absence of corneal ‘blink’ reflex when the eyeball is touched or maximum dilation of the pupil.</li> <li>• absence of <del>rhythmic</del> respiratory movements for at least three minutes</li> <li>• absence of heartbeat after three minutes</li> <li>• absence of a pulse after three minutes.</li> </ul>	Delete “rhythmic” Refer to Tristan Jubb’s comments
G11.4	Bleeding out of unconscious cattle should be done using a suitable, sharp knife. <del>The thoracic stick method should be used.</del>	Replace “thoracic stick method” with “neck cut method”.

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		Replace Note with “The recommended bleeding cuts for cattle are the throat cut to sever both carotid arteries and jugular veins in the upper neck, or the lower neck cut (stick) to sever one carotid artery low down on the neck near the thoracic inlet where its diameter is large. “
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