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Australian Animal Welfare Standards and Guidelines for Cattle Public Consultation

In response to the invitation for public comment on the draft Australian Animal Welfare Standards and Guidelines for Cattle, attached for consideration are comments from the Tasmanian Department of Primary Industries, Parks, Water and Environment.

In general, the Department supports the proposed standards and guidelines. In addition to providing general comments on the standards, specific comment has been provided in relation to:

- draft standards for which existing Tasmanian legislation imposes a higher standard; and
- suggested amendments to the draft standards

Thank you for the opportunity to comment.



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BIOSECURITY AND PRODUCT INTEGRITY DIVISION

6 May 2013

Australian Animal Welfare Standards and Guidelines for Cattle

Public Consultation

General Comments

The standards are drafted so as to be readily understood by persons with responsibility for the welfare of cattle. This approach is supported as it promotes compliance and positive outcomes in terms of animal welfare. A consequence of this approach, however, is that substantial rewording is likely to occur during legislative drafting to ensure that the regulations prescribing the standards are unambiguous and enforceable.

It is also noted that a number of the standards articulate existing requirements imposed by the *Animal Welfare Act 1993* (Tas).

Current requirements under Tasmanian legislation in relation to draft standards

Higher standards or more specific requirements imposed by existing Tasmanian legislation are noted in relation to the following draft standards:

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

Section 8 of the *Animal Welfare Act 1993* (Tas) requires that:

- food of sufficient quality is provided:
 - in sufficient quantity to meet the nutritional requirements of maintaining the animal in reasonable body condition and, if appropriate, allowing for growth and reproduction: and
 - as often as appropriate for the digestive system and metabolism of the animal.
- Fluids of sufficient quality are provided in sufficient quantity to keep the animal hydrated at all times.

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

Section 8 of the *Animal Welfare Act 1993* (Tas) requires that a person must not drive an animal in a manner or position or in circumstances that subjects or may subject the animal to unreasonable or unjustifiable pain or suffering.

S5.7 A person must only use electro-immobilisation on cattle if:

- 1) **The device is approved for use in the jurisdiction; and**
- 2) **The cattle are more than six months old; and**
- 3) **The operator is trained or it is done under direct supervision of a veterinarian or a trained person; and**
- 4) **Alternative restraining methods are not adequate to hold cattle sufficiently for the procedure being performed.**

In relation the S5.7(3), the *Animal Welfare Regulations* (Tas) prescribe that a person using electro-immobilisation must be a veterinarian.

Standards in section 6 – castration, dehorning and spaying

Under the *Tasmanian Veterinary Surgeons Regulations*, castration or dehorning of cattle over six months of age may only be performed by a registered veterinary surgeon or a veterinary student under the direct supervision of a registered veterinary surgeon.

Suggested amendments to draft standards

- S5.3** *A person must consider the welfare of cattle when using an electric prodder, and must not use it:*
- 1) on genital, anal, udder or facial areas of cattle; or**
 - 2) on calves less than three months old, unless their welfare is at risk; or**
 - 3) on cattle that are unable to move away; or**
 - 4) in an unreasonable manner on cattle.**

S5.3(2) is inconsistent with SA5.8 of the Land Transport Standards which provides that electric prodders must not be used on livestock under three months old. To ensure consistency, the words "unless their welfare is at risk" should be removed.

- 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.*

This standard should additionally specify that tethered cattle must be inspected daily.

- 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:*
- 1) is less than fourteen days old; and**
 - 2) can be segregated from its mother for four hours after treatment; and**
 - 3) can be kept dry for 12 hours after treatment; and**
 - 4) is not wet.**

The calf should be separated from any animals (including other calves) which may lick the disbudding site for four hours after treatment. It is therefore suggested that S6.5 (2) is amended to require that the calf is segregated from its mother and any other animals likely to lick the treatment site for 4 hours after treatment.