

SUBMISSION FOR CATTLE STANDARDS AND GUIDELINES – DI EVANS BSC BVMS

A. GENERAL COMMENTS

- a) It is recognised that many Standards are described as ‘outcome based’, resulting in confusion and misunderstanding, as well as posing difficulties for prosecution. These need to be revised and modified accordingly.
- b) Under Interpretation, on page 6, under Standards – the animal welfare ADD ‘LEGAL’ before requirements AND after met under law REPLACE ‘FOR LIVESTOCK WELFARE PURPOSES’ WITH ‘TO HELP SAFEGUARD ANIMAL WELFARE’.
- c) Under Principles for cattle welfare, on page 7, 4th dot point after ... ‘THEIR LIMBS’, ADD ‘WALK FREELY’. 12th dot point after end of sentence ADD ‘AND WHERE OTHER OPTIONS HAVE BEEN CONSIDERED BUT NOT ABLE TO BE USED’.
- d) Where a high welfare risk is known to be associated with specific practices and these have been described as Guidelines, it is recommended that these become Standards.
- e) The process following the closure of the public submissions to finalise the S&G document should be described.

B. SECTIONS

1. Responsibilities

All standards and guidelines supported.

2. Feed and water

Additional Standards converted from Guidelines

(Was G2.5) A person in charge must ensure that major changes in diet is introduced over an appropriate length of time and be closely monitored.

(Was G2.6) A person in charge must ensure that shy feeders are identified and managed appropriately.

(Was G2.8) A person in charge must ensure that self feeders are checked, cleaned and maintained regularly.

(Was G2.10) A person in charge must ensure that cattle have access to water daily.

(Was G2.11) A person in charge must ensure that lactating cows, and all cattle in hot weather, have access to water at least twice daily.

(Was G2.12) A person in charge must ensure that calves removed from cows have access to water at all times.

3. Risk Management of extreme weather, natural disasters, disease, injury and predation

Standards:

S3.2 MODIFY

A person in charge must ensure the inspection of cattle at intervals, at a level appropriate to the risk to the welfare of cattle and to the production system. (WELFARE RISK MENTIONED FIRST)

S3.3 MODIFY

A person in charge must ensure *appropriate* treatment for sick, injured, INSERT 'DISTRESSED', or diseased cattle at the first REMOVE REASONABLE opportunity.

Additional Standards converted from Guidelines

(Was G3.1) A person in charge must ensure that appropriate action is taken to prevent and/or minimize the risks to cattle welfare in the event of;

- Breakdown or mechanical failure affecting feed, water, ventilation or milking
- Adverse weather – specifically, conditions that predispose cattle to heat or cold
- Flood or fire
- Insufficient supply of feed or water
- Disease outbreak or injury

(Was G3.3) The person in charge must ensure that cattle are provided with adequate shelter to minimize risks during inclement weather.

(Was G3.6) The person in charge must ensure that appropriate veterinary advice on cattle disease diagnosis, prevention or treatment is sought as required.

(Was G3.7) The person in charge must ensure that cattle are vaccinated to protect against likely infectious diseases if there is a significant risk to the welfare of cattle.

(Was G3.11) The person in charge must ensure that downer cattle are assessed and treated appropriately without delay.

4. Facilities and equipment

Additional Standards converted from Guidelines

(Was G4.3) The person in charge must ensure that the surfaces of yards, pens, tracks and laneways are constructed and maintained to minimize the risk of lameness, slips and falls.

(Was G4.4) The person in charge must ensure that facilities are free of protrusions and obstacles that may cause injury.

(Was G4.6) The person in charge must ensure that faeces and urine accumulations are removed regularly.

(Was G4.7) The person in charge must ensure that housed systems have hospital pens with a comfortable lying surface are used for sick or injured cattle.

(Was G4.9) The person in charge must ensure that cattle have the opportunity for appropriate exercise each day.

(Was G4.10) The person in charge must ensure that air is of an acceptable quality with respect to dust, chemicals, odours and smoke.

(Was G4.11) The person in charge must ensure that concrete flooring in rest areas is covered by an adequate depth of appropriate bedding material.

(Was G4.12) The person in charge must ensure that fire alarms and adequate fire fighting equipment should be fitted and maintained in all indoor housing systems.

Additional Standard

Cattle are not to be maintained in single pens for commercial production systems.

Guidelines:

G4.7 MODIFY

Downer cows should either be moved to a hospital pen or provided with a comfortable, safe area.

5. Handling and management

Standards:

S5.1 MODIFY

DELETE 'IN AN UNREASONABLE MANNER' AFTER STRIKE.

S5.3 MODIFY

Electric prodders MUST not be used on cattle.

S5.5 MODIFY

A person in charge must ensure that dogs are not used when handling unweaned calves.

S5.6 MODIFY

A person in charge MUST not tether cattle.

S5.7 MODIFY

A person MUST not use electro-immobilisation on cattle.

S5.8 DELETE

Additional Standards

A person in charge must ensure that an earmark is not used to identify cattle.

A person in charge must ensure that hot iron branding is not used to identify cattle.

Additional Standards converted from Guidelines

(Was G5.7) A person must allow cattle to rest or to slow if they show signs of exhaustion.

(Was G5.8) A person must handle calves less than 30 days old with care.

(Was G5.13) A person must not cause damage to soft tissue when foot paring.

(Was G5.10) A person in charge must ensure that wounds are treated *appropriately* to prevent infection.

(Was G5.28) A person in charge must ensure that ear tagging and tattooing is done in a way that minimizes the risk of infection and tearing of the ear.

(Was G5.29) A person in charge must ensure that (DELETE ear marking) tattooing instruments are sharp and clean, and that hygienic techniques are used.

Guidelines:

G5.5 MODIFY

If handling aids are used, then drafting canes, flappers, flags, rattles and other noise makers are recommended.

G5.6 MODIFY

Use of dogs (DELETE and electric prodders) should REPLACE be limited to the minimum necessary WITH not be used routinely.

G5.16 MODIFY

After husbandry procedures, appropriate management should be undertaken to ensure effective mothering-up of calves at foot.

G5.17 MODIFY

Cattle should not be handled during extreme weather.

G5.14, G5.20, G5.21, G5.22, G5.23, G5.24, G5.25, G5.26, G5.27 DELETE

6. Castration, dehorning and spaying

Standards:

S6.2 MODIFY

A person in charge must use pain relief when castrating cattle.

S6.4 MODIFY

A person in charge must use pain relief when dehorning cattle.

S6.5 MODIFY

A person must not use caustic chemicals to disbud calves.

S6.7 MODIFY

A person spaying a cow must be a veterinarian and appropriate analgesia must be used.

S6.8 MODIFY

A person must not use flank spaying or webbing in cattle.

Additional Standards converted from Guidelines

(Was G6.4 1st sentence) A person in charge must ensure good hygiene practices are implemented in relation to facilities, operator hands, handling and instruments.

(Was G6.8) A person in charge must ensure that bleeding from surgical wounds is minimized by selecting and appropriate method, preventing overheating of calvs and allowing them to settle after mustering.

(Was G6.9) A person in charge must ensure that infection is minimized by avoiding muddy or dusty yards, and wet weather.

(Was G6.11) A person in charge must ensure that cattle are inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken if there are signs of pain, bleeding or infection.

(Was G6.13) A person in charge must ensure calves are more than 24 hours old when castrated.

(Was G6.23) A person in charge must ensure that tipping only removes the solid, nonvascular portion of the horn resulting in a blunt horn end.

(Was G6.24) A person in charge must ensure that horn regrowth or a scur that has a blunt end is not dehorned or tipped.

Guidelines:

G6.4 MODIFY

Convert 1st sentence to Standard. Retain 2nd sentence.

G6.22 Delete

Not relevant if caustic chemicals not permitted to be used to disbud calves.

Additional Guideline

Alternatives to spaying should be implemented where possible including segregation of cows from bulls, pregnancy testing and providing appropriate feed to pregnant cows.

7. Breeding management

Standards:

S7.3 MODIFY

A person in charge must ensure that routine calving induction is not done.

S7.4 MODIFY

A person in charge must ensure that induced calves receive adequate colostrum INSERT 'AND SPECIAL CARE', or be humanely killed at the first opportunity, and before they are 12 hours old.

Additional Standards converted from Guidelines

(Was G7.1) Technicians responsible for breeding management must be accredited and have an understanding of the reproduction and behavior of both the cow and the bull.

(Was G7.5) A person in charge must ensure that cows that receive severe injuries during calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) receive urgent and appropriate treatment, or are humanely killed without delay.

(Was G7.6) A person in charge must ensure that weak or orphaned calves with very little chance of survival are promptly and humanely killed.

Induction of calving – G7.8-G7.10 DELETE as routine calving must not be done.

Additional Standard

A person must not restrain cows or heifers for bull serving capacity tests.

Guidelines

G7.4 MODIFY

For 2nd and 3rd dot points, REPLACE 'AVOIDING' with 'NOT'.

8. Calf-rearing systems

Standards:

S8.2 MODIFY

A person must ensure calves that are housed in pens can turn around, lie down and fully stretch their limbs INSERT 'AND BE ABLE TO WALK FREELY TO EXERCISE'.

Additional Standard

A person in charge must ensure calves are not housed individually for commercial purposes.

Additional Standards converted from Guidelines

(Was G8.1) A person in charge must ensure that calves that are removed from cows receive colostrum within 12 hours of birth, with the first administration occurring as soon as possible.

(Was G8.3) A person in charge must ensure that if artificial feeding of new-born calves is required, the calves are supervised until they are successfully trained to self-feed.

(Was G8.9) A person in charge must ensure that solid feeds are gradually introduced and roughage is provided to encourage the development of the rumen function from three weeks of age.

(Was G8.10) A person in charge must ensure that feeding equipment is hygienically maintained.

(Was G8.11) A person in charge must ensure that calves that become sick are placed in a hospital pen and treated immediately.

(Was G8.12) A person in charge must ensure that a minimum floor area of 1.5-2.0m² is provided for each calf in group pens.

(Was G8.13) A person in charge must ensure that calves are raised in an environment that is;

- Clean
- Dry
- Well drained
- Provided with sufficient bedding
- Draught free and well ventilated
- Free from projections that may cause injury
- Protected from weather extremes
- Provided with natural light

Guidelines

G8.2 MODIFY

The colostrum should be of high quality.

G8.6 & G8.7 DELETE

- as S8.5 prohibits calves from being housed individually for commercial purposes.

9. Dairy management

Standards:

Additional Standards converted from Guidelines

(Was G9.1) A person in charge must ensure that milking machinery and equipment is regularly tested and maintained.

(Was G9.8) A person in charge must ensure that extra teats are hygienically removed by a veterinarian using pain relief.

(Was G9.9) A person in charge must ensure that calving in free stalls does not occur.

10. Beef feedlots

Standards:

S10.3 MODIFY

A person in charge must ensure INSERT 'APPROPRIATE AND ADEQUATE' feed is available daily to cattle in the beef feedlot.

S10.4 MODIFY

A person in charge must do INSERT 'AND DOCUMENT' a risk assessment each year for the heat load risk at the feedlot, and implement appropriate actions to manage ongoing heat load risk.

S10.8 MODIFY

A person in charge must ensure INSERT 'AND RECORD' the daily inspection of all cattle within the feedlot.

S10.9 MODIFY

A person in charge must ensure REPLACE REMAINDER OF SENTENCE WITH 'PREGNANT COWS ARE IDENTIFIED AND PLACED IN A SAFE, COMFORTABLE AREA TO CALVE AND THAT APPROPRIATE MANAGEMENT OF NEWBORN CALVES IS PROVIDED TO ENSURE THEIR WELFARE'.

Additional Standards converted from Guidelines

(Was G10.1) A person in charge must ensure that feedlots are accredited under a third party, audited quality-assurance system.

(Was G10.6) A person in charge must ensure and document that new arrivals to a feedlot are closely inspected for injury and illness within 24 hours of arrival.

(Was G10.14) A person in charge must ensure that water troughs are inspected daily and maintained in a clean condition.

Guidelines

G10.9 MODIFY

Calves born in feed yards should be segregated with their mothers or INSERT '*promptly*' humanely killed.

G10.17 MODIFY - 3rd dot point

- management factors, which may include the provision of shade, provision of additional water troughs, INSERT 'ENSURING APPROPRIATE' water temperature, INSERT 'PROVISION OF APPROPRIATE' ration type and manure management practice.

G10.8 DELETE

- as covered under S10.9

11. Humane killing

Standards:

S11.2 MODIFY

A person must INSERT 'BE TRAINED AND DEMONSTRATE' the relevant knowledge

S11.3 MODIFY

DELETE THE WORD REASONABLE

S11.4 MODIFY

REPLACE THE WORD 'REASONABLE' WITH 'APPROPRIATE'

S11.5 MODIFY

A person must not kill any cattle by a blow to the forehead.

Additional Standards converted from Guidelines

(Was G11.3) A person must ensure that three or more of the following signs are observed to determine whether the method used for humane killing caused death;
INSERT SIGNS LISTED ON PAGE 34 HERE.

(Was G11.4) A person must ensure that bleeding out of unconscious cattle is done using a suitable, sharp knife and that the thoracic stick method is used.

Guidelines

G11.2

Move subheadings and associated sections for Firearms and Captive bolt devices under G11.2 before Note: For adult cattle, a rifle.....

Under Captive bolt devices, REPLACE '*be accompanied by*' with '*done only with*' appropriate restraint...