

## **Edgar's Mission's submission to the public consultation on the Australian Animal Welfare Standards and Guidelines – Cattle (Edition One)**

As a member society of Animals Australia, Edgar's Mission endorses Animals Australia's submission with the exception of two of their recommendations regarding S3.2 and S6.2 at the end of this submission. Firstly we would like to make the following points:

- The draft standards and guidelines maintain the current unacceptable status quo in regard to welfare standards for cattle kept commercially in Australia.
- There is a disregard for the sound scientific evidence and obviously painful and cruel practices documented in the Discussion Papers.
- The process accepts industry arguments that change is not possible or affordable.
- Many of the Standards include subjective words rather than enforceable minimums.
- Without some quantifiable minimum inspection interval being provided for different farming systems/situations, such Standards are not enforceable, and thus existing State/Territory animal welfare laws are likely to remain the primary 'safety net' - the unacceptable status quo in regard to many key issues.
- The draft Standards fail to provide 'mandatory statements' to effectively address the 'regulatory failures' of the Model Code identified in the RIS including; the inadequate control of dogs, electro-immobilisation, identification and branding, pain relief during castration, disbudding, dehorning and spaying, heat stress, and euthanasia of calves.
- There are only a relatively small number of mandatory increments – primarily bans on some practices which in almost all cases the RIS makes it clear that these practices (intended to be banned or limited) are rare eg branding on the head of cattle.
- In contrast, a vast number of unacceptable painful practices will remain, particularly dehorning, spaying, disbudding, castration, and branding, and they will largely not require pain relief at the age these surgical mutilations usually occur i.e. no actual change for most animals.
- Management practices that have clear alternatives will continue to be allowed, i.e. electro-immobilisation, electric prods, use of caustic chemicals for disbudding calves, calving inductions of dairy cows, the single penning of dairy calves, and unacceptable practices will continue e.g. shotguns can still be used as an aid for helicopter mustering (as long as metal shot is not used), and a person in charge of cattle can strike an animal, as long as it is done in a 'reasonable manner'.
- Of great concern is that key welfare responsibilities such as enforcement of access to food and water, provision of shade and shelter, and adequate inspection so that health and welfare issues can be dealt with promptly as they arise (and thus reduce suffering) have not been effectively addressed by this draft.

- The draft Standards does not provide world leadership, as is often claimed by the Australian Government and industry and are in some aspects below those of the of the OIE international minimums.
- Use of the OIE guidelines as a baseline is not acceptable, particularly given they were established to provide a basic minimum set of international standards for developing nations and those countries without existing animal welfare legal and enforcement arrangements.
- We have no confidence that there will be inspection or enforcement of these new Standards and thus any clear increment over the current (unacceptable) level of compliance activity.
- Despite clear welfare concerns identified with the use of electro-immobilisation in the Discussion Paper and its complete ban or restriction of use to veterinarians in some states, the draft Standard would allow it to be undertaken by a lay person that had received minimal training. This represents a reduction in welfare standards.
- With the identified market failures' in regards to animal welfare in the cattle industry and its inherent inability to quantify the costs associated with poor animal welfare outcomes the precautionary principle should be applied, that is, doubt creates an obligation to act to prevent possible harm, not an excuse to accept the status quo. As a minimum, all variations under Option C should be imposed.

While we support many of the views raised by Animals Australia in relation to S3.2 and S6.2 we do not endorse their compromise recommendations and submit our recommendations for each.

#### Castration

- Scientific studies suggest that castration is 'acutely painful and distressing' and should always be carried out using pain relief (short and long acting), whatever the age of the animal. Like Animals Australia we believe that pain relief should always be used when castrating cattle and **do not** endorse their compromise recommendation allowing castration without pain relieve on cattle less than 3 months old.
- Instead **we recommend:** S6.2 A person in charge must use \*pain relief\* when \*castrating\* cattle.

#### Inspection of cattle

- Like Animals Australia we believe Standard S3.2 is inadequate as it provides no specific inspection regime. Cattle and calves can be injured, ill, entrapped or subject to predation and should be assisted as quickly as possible. We share Animals Australia's strong view that all animals should be inspected daily (to reduce the time any risks are addressed and suffering alleviated) so **do not** endorse their recommendation: that a person in charge must ensure the \*inspection\* of cattle **at least weekly**, or more frequently dependent upon the production system and the risk to the welfare of cattle.
- Instead **we recommend:** S3.2 A person in charge must ensure the \*inspection\* of cattle at least daily.

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