

Submission to Australian Animal Welfare Standards & Guidelines Cattle Public Consultation:

Background - I am a Veterinarian working in mixed animal Practice, and a beef cattle owner/producer in Victoria. Thank you for the opportunity to comment on these drafts, and for attempting to improve & align farmed animal practices.

Feedlots:

- as current recommendations cite 12m sq. as minimum standard space, why reduce to 9m sq.?
- EHL is a softer way of saying hyperthermia, and an animal will be in extreme discomfort and stress before reaching this physiological level.
- the EHL action plan refers to adopting 'appropriate actions': this is vague, and leaves scope to do little towards EHL, and subsequent deaths or related illness.
- all feedlots where EHL is likely, should have the capacity for a sun protection system (shade cloth or other form of cover), or sprinkler & fan system for evaporative cooling.
- there is no mention of protocols for cold weather protection?
- G.18 mentions calves born to be segregated with mothers or 'humanely' killed, but doesn't define what method(s) are humane.

Castration:

There is conflicting/unclear objective data on what method is best, & what current practices cause less pain/stress, complications & death compared with others, but there are a few concrete facts:

- the more mature the animal, the more blood supply to the testicles, the more chance of severe (possible fatal) haemorrhage without some form of haemostasis.
- ringing is only physically possible and likely to work well, up to a certain size/age.
- while we can restrain younger calves to perform castration easier & more successfully at a younger age, that doesn't mean they are not feeling just as much pain, and would react just as violently as older, stronger animals if they could.
-
- ringing as a form of castration should only be used on calves between 2 days and 6 weeks of age, and should be used in conjunction with local anaesthetic (provided for this purpose).
- surgical castration by a non veterinarian should only be performed on calves up to 6 months of age, with local anaesthetic (provided for this purpose).
- all castration of cattle over 6 months of age should be done by a Veterinary surgeon.

Dehorning & Disbudding:

- based on your information provided, and first hand experience of the distress de horning causes in older cattle, it seems reasonable to restrict disbudding to the cautery method for calves up to 8 weeks, and de horning on older cattle to be restricted to a Veterinary Surgeon or an accredited technician, where at least a nerve block, preferably in conjunction with a sedative & NSAID will be used.
- there seems to be little emphasis in the recommendations on fly strike complications, which is a big issue when the sinuses are exposed.
- perhaps more education & awareness of the futility of the procedure on younger cattle destined for early slaughter could be circulated.

Electro-immobilization:

I strongly oppose the recommendation that 'EI practices are appropriate and minimize the risk to the welfare of cattle'. How can electrically shocking an animal to the point where it cannot move/breathe, but feel and be aware of all procedures be deemed 'appropriate'? It might minimize the risk to meat production, but does NOT minimize the risk to live cattle welfare.

I see it as a cruel way to carry out painful procedures on animals, because it is cheaper & easier than alternative restraint & medical intervention, which reduce painful responses.

Identification:

- hot branding could be banned for farming other than extensive large scale properties, where ear tags/devices work well.
- more money could be provided for research into other, less invasive visual ID in station situations.

Induction of calving:

- this should be banned when it is only an aid in producing compact calving patterns.
- although I am not experienced in dairy farming, there must be other options that are practical to the farmer.

Spaying:

- legislation must be formulated to tighten how this procedure can be performed: surely it is not right for anyone to be able to immobilize a cow, rip the abdomen open and cut off body parts without any form of anaesthetic!
- S 6.7 & 6.8; the flank method should ONLY be performed by a Veterinarian with LA and a NSAID, and the muscle layers should be sutured. The DOT method should only be performed by a Veterinarian or accredited technician who would be supplied a NSAID injection for this purpose. Spaying a cow should not be allowed under any other circumstances.
- all heifers & cows should be pregnancy tested first, as it does not help the dystocia issue if the foetus is old enough to remain viable, and becomes a welfare issue for the calves.

Tail Docking:

- needs to be made an offense to dock any animals tail (other than sheep), unless for individual medical reasons, & to be performed by a Veterinarian with LA.
- there appears to be no appreciable benefits for dairy cattle that cannot be overcome with other management practices.

General:

- many of the recommendations use very 'loose' statements, such as 'As far as practical', which leaves interpretation open as far as doing nothing.
- the term, 'relevant knowledge, experience or skills' could mean anything: does the person in charge have been instructed fully by an experienced and competent person, or seen a friend de horn the cow once from afar?

- the term 'appropriate tools & methods' could mean anything: is the person in charge using a surgical scrub & a sterile scalpel blade to castrate the older calf, or does this entail wiping the manure off the dirty, blunt pocket knife?
- accreditation, if achieved, for procedures such as DOT spaying & dehorning, needs to be well implemented & offer good training, not just be a box ticked.
- it appears that many feedlot welfare issues could be reduced by educated & close supervision & monitoring, so perhaps there needs to be a higher salary offered for this type of position.
- 'pain relief' under it's definition should be replaced with 'specific' pain relief, as an intramuscular injection of NSAID after the surgical castration is not going to help much.
- I have no experience or knowledge of extensive beef cattle farming in Northern Australia. With the greatest respect to those individuals operating these enterprises, in what must sometimes be very difficult & dangerous circumstances & climatic conditions, the size and scale of the operation should not be a green light for 'anything goes' with respect to animal care. The recommendations seem to have one set of acceptable standards for extensive farming, and another for all others. Better management strategies could be implemented with more time & money put into procedures.
- Australia seems a long way behind other comparable developed countries with respect to the farming procedures we allow, and how we allow them to be done, from an animal welfare & moral standpoint. Industry needs to be careful that some of our markets are not reduced/boycotted because of this: this should not be underestimated.
- welfare organizations now have the knowledge, capacity & money to drive large scale advertisements & public awareness programs, sufficient to significantly impact on individuals & industry. If organizations with direct impact on legislation for farming practices continue to act poorly in this regard, and allow profit to override reasonable farmed animal care & welfare, this will come out into the open.