

To Whom It May Concern,

Submission by the Northern Territory Department of Primary Industry and Fisheries (DPIF) for the current draft of the Cattle Welfare Standards

**1. Response to Regulatory Impact Statement options**

Option A; converting the national standards into national voluntary guidelines.

NT does not support.

Option B; The proposed national standards as drafted.

NT supports, subject to consideration of some variations as in option C

Option C; variations of the proposed national standards as follows:

C1 Pain relief for **flank** spaying.

Supported

C 2 Banning flank spaying.

Not supported

C 3 Banning permanent tethering.

Supported

C 4 Banning the use of dogs on calves <30 days old.

Supported

C 5 Banning caustic de-horning

Supported

C 6 Banning calf induction except for veterinary requirements.

Supported

C 7 Banning electro-immobilisation.

Not supported

## **2. Response to draft Animal Welfare Standards and Guidelines.**

Specific NT issues with the draft standards.

### **A. Standards relating to pain relief with castration, dehorning and spaying.(S.6.2,4&8)**

There are undetermined costs and issues associated with the use of veterinary drugs by cattle producers in remote northern Australia. The real costs to NT cattle producers need to be factored in when determining the impact of these regulations on them. We understand that the NTCA has asked for a longer consultation period in preparing their response, primarily to ascertain costs, availability and accessibility of required drugs for pain relief. DPIF would strongly support this to allow the best decision making process, as the northern cattle producers will be the major players affected by this.

1. Requirement for pain relief for castration and dehorning over 6 months or 12 months if first time through the yard.

It is considered that pain relief is a reasonable expectation for older animals as outlined. There are some questions about drug efficacy. Also as monitoring of compliance is virtually impossible, due to the distances involved, the level of compliance may be low.

2. Requirement for pain relief for cattle spaying.

Cattle spaying is not a husbandry practice used across much of Australia. It is however commonly practiced on many northern and central Australian properties, due to the inability to control bulls and for market access reasons. While there are some long term animal welfare benefits, there are short term adverse outcomes. The advantage to producers is the higher survival and marketability of the non-breeding females.

DPIF supports the requirement for pain relief for flank spaying. Consideration of pain relief for other spay methods depends on the real costs and accessibility to veterinary drugs for cattle producers that is determined. Support this aspect of C1 of the RIS with those provisions.

### **B. Standards relating to risk management.**

S3 .3 states 'a person in charge must ensure appropriate treatment for sick, injured or diseased cattle at the first reasonable opportunity'.

DPIF suggests 'or humane killing' be added after the word 'treatment'. Humane killing ASAP is still not a recognised imperative by some producers in the NT and other rangeland areas. Many producers would not consider killing to be a 'treatment'. This is one of the NT cattle welfare challenges as some producers have the view that it is normal for cattle to perish late in the dry season or in droughts. Appropriate treatment or humane killing at the first reasonable opportunity, provides a reasonableness test.

C. Standards relating to feedlots.

S10 .1 states 'a person in charge must ensure a minimum area of 9 square m per standard cattle unit for cattle held in external pens'.

NT does not have feedlots but a number of 'export yards'. These yards are not for production, but for holding and processing cattle prior to export. These cattle are held for short periods-usually 2-7 days. The stocking density under ASEL and DAFF standards is less than in feedlots.

DPIF would request that export yards continue to abide by ASEL standards in respect to stocking density.

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