



Northern Territory Cattlemen's Association

NTCA - 2013

SUBMISSION

DRAFT CATTLE WELFARE STANDARDS & GUIDELINES



'Advancing and protecting the interests of the cattle producers in the Northern Territory'



Northern Territory Cattlemen's Association

Contents

Introduction	3
Background - NTCA.....	3
Membership base.....	4
Production systems – Northern Australia	5
Standards & Guidelines	5
Pain relief	6
Practical considerations – pain relief	7
Public consultation - questions	8



Northern Territory Cattlemen's Association

Introduction

The Northern Territory Cattlemen's Association (NTCA) is the peak body for the NT cattle industry, providing leadership at the NT, national and international level on industry engagement, resource management, market access, production and policy. Representing a multi-tenure, cultural and economic membership base the NTCA maintains a unique position as Australia's most representative producer body.

Page | 3

The NTCA has been a leader in initiation and facilitation of advances in production, science, social and cultural policy across an industry which manages vast tracts of the NT and more generally Northern Australia.

The NT cattle industry (like much of that across the north of Australia) has some distinct and important points of difference from cattle production systems in southern Australia and agricultural areas including:

Systems are based almost entirely upon open range grazing on natural pastures, with an average herd size of approximately 8,000 head on 3,000 km² (average holding). These production systems produce high quality, clean and well adapted animals able to graze freely and with less intervention. In general cattle are mustered no more than two times per year in order to conduct essential husbandry and care, selection and preparation for sales.

Background - NTCA

The Northern Territory Cattlemen's Association (NTCA) Inc. is the peak primary industry body representing 90% of the Territory's industry, from small family operations, to the large corporate organisations.

Our Northern Territory members manage a landmass in excess of 700,000 square kilometres (45% of the NT Landmass), producing 600,000 high quality cattle per year and providing leadership in pastoral land conservation, market development and trade, regional development, Indigenous employment and engagement.

The pastoral industry is the Northern Territory's third largest GDP earner, equating to more than 60% of primary production in the NT, generating over \$400 million directly and \$800 million indirectly into the Northern Territory's economy.

The industry directly provides in excess of 1800 jobs and has contributed to the growth of the Territory for over 150 years. It continues to increase in size, productivity and efficiency.

By area, employment and economic contribution the pastoral industry is the dominate industry in land management in the NT, with a predominate focus on long term sustainable production.

NT producers supply cattle to all states and territories of Australia and produce quality animals suited for the live export trade to South East Asia, including, on average up to 300,000 head exported to Indonesia annually.

'Advancing and protecting the interests of the cattle producers in the Northern Territory'



Northern Territory Cattlemen's Association

The NTCA is a leader in building relationships outside Australia, with ongoing and effective programs to build long term relationships in our near region. Indonesia has, and will continue to be a key partner in the future of northern Australia and we are continuing to build the 1 to 1 personal and business relationships on which that future rests.

Page | 4

Membership base

The NTCA membership base draws on the NT herd of 2.1 m head across small Indigenous and non-indigenous family operations to all the corporate organisations across 700,000 kms² of pastoral lease, crown lease, freehold and Aboriginal freehold land (ALRA 1976).

The membership base includes corporate operations spanning Northern Australia. These iconic companies collectively manage vast areas of Western Australia, the Northern Territory, Queensland and New South Wales, and make a major contribution to regional development, employment, Australian food production and overseas trade.

Along with family-based farming and pastoral operations the NTCA, like no other representative body in Australia can claim close to full industry membership.



Moving young cattle – Victoria River District



Northern Territory Cattlemen's Association

Production systems – Northern Australia

Systems are based almost entirely upon open range grazing on natural pastures, with an average herd size of approximately 8,000 head on 3,000 km² (average holding). In general cattle are mustered no more than two times per year in order to conduct essential husbandry and care, selection and preparation for sales. Many properties have areas where complete control of livestock is not possible, sometimes resulting in an inability to muster 100% of stock at any given time and to muster or remove undesirable cattle for genetic, character or biosecurity traits or risk. This challenge is balanced against the benefits of cattle able to graze freely on a variety of pastures and terrain.

Page | 5

The constraints leading from the inability to deliver full control of livestock at all times means that much of the accepted norms operating in agricultural and farming areas should not be assumed to be standard in pastoral and northern areas. This includes issues such as:

1. Age, genetics and temperament of some cattle at first time of muster.
2. Capacity to control or respond effectively to natural elements such as fire, flood, biosecurity and predation.
3. Access to and or cost of access to veterinary specialists.
4. Access to and or legality relating to anaesthetic and other chemicals.

It is for this and a number of reasons which are explained below that the NTCA argues for caution in the application of standards and guidelines which advocate a “one size fits all”.

Standards & Guidelines

The NTCA supports sound animal welfare and passed a resolution at the 2013 AGM and conference to publicly voice this position.

“NTCA supports good animal welfare. NTCA expects all members will responsibly comply with all current animal welfare laws, standards and regulations. NTCA will endeavor to provide pertinent information to members as regularly as possible”.

Given the discussion below the NTCA does not support the introduction of mandatory standards where:

1. They do not support good animal welfare outcomes.
2. They cannot be practiced for practical, economic or legal reasons.
3. Their introduction may inadvertently encourage contravention of the standards and illegal activity due to point two above.
4. They fail to take account of regional / other critical variability and constraints.
5. Their introduction imposes an additional financial burden on producers operating under sound, scientifically justified welfare practices.



Northern Territory Cattlemen's Association

Pain relief

In particular the NTCA raises significant concern regarding **Section 6** (castration, dehorning and spaying) and sections **6.2, 6.4, 6.7 & 6.8** as they relate to “**pain relief**, unless cattle are less than 6 months old, or less than 12 months at their first yarding and where the later age is approved in the jurisdiction”.

Page | 6

By way of a consultative process at Branch and Executive level the NTCA developed the following statement of position with regard to pain relief:

“For pain relief to be included in animal welfare standards then the pain relief and the process must provide positive welfare outcomes, be accessible, practical and cost effective”.

This position places pain relief in the context of the process and the economic, geographic and production system context rather than a simple focus on the drug or operation in isolation

The NTCA **strongly suggests** that the elements of the standards which require **pain relief be removed** until such time that they can be demonstrated to meet the NTCA statement above. Inclusion of pain relief at this time will be legislating to fail.

The following extract is from a report by Dr. Carol Petherick. Dr Petherick, from the University of Queensland is a leading researcher on animal behavior and welfare, with a focus on rangeland beef cattle production systems. It is both clear and alarming from this that the use of analgesics and pain relief will not necessarily provide positive animal welfare outcomes, and potentially have the opposite effect. It appears illogical to be even considering, let alone mandating, procedures which have not been proven to be beneficial in the first place.

“Administration of an analgesic provided some alleviation of pain, but for optimal effectiveness it would need to be given 20 to 30 min prior to castration, if administered intramuscularly. This requirement is likely to be difficult to accommodate with current cattle handling procedures, as it would necessitate either double-handling of the animals or a lengthy holding period in the race. Further, ketoprofen was associated with increased blood loss in the surgical castrates, which may be an additional risk for cattle with low haematocrit levels. Ketoprofen administration also had some unexpected consequences; average liveweights of the mature cattle were lower in the ketoprofen treated than saline-treated animals. This is paradoxical given that ketoprofen alleviated pain and has a short period of effect (12-24 hrs). Additionally, lateral lying was seen significantly more in the banded cattle given ketoprofen than other treatments and, at this time, we are unable to explain this finding.”

At present it appears that any imposition of the need for pain relief/analgesia will be a salve for the spectator/operator rather than the animal. While our members have consistently requested improved technologies and methodologies for essential husbandry procedures, they are unprepared to accept imposition of standards or legislation which does not meet the above position statement. Rather than imposing standards for the sake of academic appeasement, a far better permanent outcome would

‘Advancing and protecting the interests of the cattle producers in the Northern Territory’



Northern Territory Cattlemen's Association

be to improve the research, development, extension, education and train (RDEET) effort to provide the long-requested improvements including genetic selection and non-surgical procedures for treatments critical to an animal's welfare over the long term.

Practical considerations – pain relief

Page | 7

Pain relief should be seen in the context of the overall process an animal (and its companions), may be subjected to as part of routine processing, and includes:

1. Time spent in yards / races / processing / for standard procedures versus those which may require administration of pain relief.
2. Requirement for post or pre-operative pain relief and resulting prolonged time in confinement of animals being treated and or accompanying.
3. Temperament of animals from rangeland production systems and stress related to confinement / extended confinement.
4. From information available, pre-operative pain relief drugs are not available to non-veterinarians and therefore not available to the vast majority of producers. For animals which may require pre-operative pain relief it could only be administered by a veterinarian and likely to be highly variable in number and frequency (of animals), in remote and often difficult to access locations.
5. Availability of veterinarians is limited when placed in the context of location, access and timeliness.
6. The costs associated with engaging veterinarians for isolated and infrequent tasks or regular tasks are currently prohibitive.
7. There are no accepted post-operative drugs recommended for cattle. While Tri Solfen can be used for sheep its efficacy is not established for cattle.
8. There are no post-operative drugs approved for non-trained people.
9. Is the theoretical saving of pain of one animal, for a number of hours at the expense of good animal welfare for a wider herd.
10. Good animal welfare outcomes are delivered with quick, efficient, calm handling, optimal handling and minimisation of stress (without drugs)
 - a. Good yards and equipment
 - b. Good husbandry practices and management.
 - c. Good environment for post processing care and husbandry.
 - d. Good animal health and disease management.



Northern Territory Cattlemen's Association

Public consultation - questions

The objective of the proposed Standards and Guidelines (S&G) is stated as:

To minimise risks to cattle welfare and to reduce regulatory burden in a way that is practical for implementation and industry compliance.

Page | 8

The proposed S&G have been subject to an initial Regulatory Impact Statement (RIS). Further examination of the impact of the proposed S&G will follow the public consultation phase. The questions below address key parts of the S&G. In exploring the impacts three scenarios are being examined:

Option A: converting the proposed national standards into national voluntary guidelines (the minimum intervention option);

Option B: the proposed national standards as currently drafted;

Option C: one or more variations of the proposed national standards as follows:

Variation C1: pain relief for all spaying

Variation C2: banning flank spaying/flank webbing

Variation C3: banning permanent tethering

Variation C4: banning the use of dogs on calves

Variation C5: banning caustic dehorning

Variation C6: banning induction of early calving except for veterinary requirements

Variation C7: banning electro-immobilisation

Public consultation question 1: In your experience, to what extent does the existing MCOP (*Model Code of Practice for the Welfare of Animals – Cattle*) and related regulations create uncertainty for industry? Does such uncertainty vary between different states and territories?

The operation of the MCOP is deemed to be effective by the NTCA and members. It provides the framework for state based legislation and guidance for jurisdictional regulators. There is some capacity for variation in production systems, geography and climate.

Public consultation question 2: Do you have evidence of the percentage of cattle farming businesses that operate in more than one jurisdiction and how many cattle are likely to be affected? Please provide percentage estimates for various combinations of states and territories.

It is estimated that from to 40%- 60% of NT production is operated by business entities that operate across jurisdiction. This applies to 1-1.5 million head.



Northern Territory Cattlemen's Association

Public consultation question 3: Do you have evidence of jurisdictional differences in welfare standards for cattle that result in the need to use multiple farming practices within the same farming business? If so, does this result in higher costs to farmers? How much are these additional costs?

No comment

Public consultation question 4: Do you know of other differences in current state or territory welfare standards for cattle; and if so, what are these?

No comment

Public consultation question 5: Do you believe that the net benefits achieved under option A (proposed standards are adopted as guidelines only), including welfare benefits and reduction in excess regulatory burden, are justified?

While the NTCA acknowledges that national / jurisdictional standards can deliver improved perceptions and broader community support, there is little value in the application of standards that are unable to deliver improved welfare outcomes or cannot be met across the rangelands. It is important that the standards do not legislate to fail or encourage non-compliance for the reasons previously listed.

Public consultation question 6: Do you believe that the net benefits achieved under option B (the proposed national standards as currently drafted), including welfare benefits and reduction in excess regulatory burden, are justified?

No. It will not be possible to effectively deliver on a number of aspects of the standards including pain relief.

Public consultation question 7: Do you believe that the benefits achieved under Variation C1 of Option B, including welfare benefits of pain relief with spaying and reduction in excess regulatory burden, are justified?

Where effective, economic and accessible pain relief is available then this option could be revisited. Until then it should be removed and acknowledged as an aspirational goal.

Public consultation question 8: Do you believe that the benefits achieved under Variation C2 of Option B, including welfare benefits of banning flank spaying and webbing and reduction in excess regulatory burden, are justified?

No. The consequences of removal of an essential fertility management tool will have a resulting negative impact on female welfare and wellbeing. The ongoing research and search for viable non-surgical methods is seen as a priority which requires continued / increased investment.



Northern Territory Cattlemen's Association

Public consultation question 9: Do you believe that the benefits achieved under Variation C3 of Option B, including welfare benefits of banning tethering and reduction in excess regulatory burden, are justified?

Removal of options for control of livestock in some situations may not be desirable. The overall objective must be to allow decision making that delivers an animal welfare outcome.

Page | 10

Public consultation question 10: Do you believe that the benefits achieved under Variation C4 of Option B, including welfare benefits of banning the use of dogs on calves and reduction in excess regulatory burden, are justified?

Banning the use of dogs or mandating the muzzling of dogs with certain classes of livestock is not supported. In contrast guidelines should focus on ensuring full control of the dog. Not all dogs bite and the mandated use of muzzles can create additional welfare issues including in hot, humid and or heavily vegetated environments.

Public consultation question 11: Do you believe that the benefits achieved under Variation C5 of Option B, including welfare benefits of banning caustic dehorning and reduction in excess regulatory burden, are justified?

No comment N/A

Public consultation question 12: Do you believe that the benefits achieved under Variation C6 of Option B, including welfare benefits of banning induction of early calving except for veterinary requirements and reduction in excess regulatory burden, are justified?

No. The option in rare circumstances to abort fetuses for heifers going into a drought is required to ensure better welfare outcomes for the heifer

Public consultation question 13: Do you believe that the benefits achieved under Variation C7 of Option B, including welfare benefits of banning electro-immobilisation and reduction in excess regulatory burden, are justified?

No. Electro-immobilisation does have a role in some very limited situations when used correctly and should be operated to acceptable standards. Electro-immobilisation can deliver improved welfare outcomes. We consider the debate and scientific investigation of the positive benefits of EI to be academic and often practically naïve.

Public consultation question 14: Do you know the number or percentage of dogs requiring training or any information under proposed standard S5.4 to improve the estimation of costs?

No comment.



Northern Territory Cattlemen's Association

Public consultation question 15: Do you know the number or percentage of dogs requiring muzzling proposed standard S5.5, or any information to improve the estimation of costs?

No. Refer question 10 above.

Page | 11

Public consultation question 16: Do you know the number or percentage of cattle tethered and requiring exercise under proposed standard S5.6 or any information to improve the estimation of costs?

No comment. Refer also question 9 above.

Public consultation question 17: Do you know the number or percentage of cattle subject to electro-immobilisation, the number of farmhands requiring training under proposed standard S5.7 or any information to improve the estimation of training costs?

No comment. No data available.

Public consultation question 18: Do you know the number or percentage of cattle requiring pain relief for castration under proposed standard S6.2; or any information to improve the estimation of costs?

Estimate of 2% - 10% of annual production - up to 60,000 animals per year.

Public consultation question 19: Do you know the number or percentage of cattle requiring pain relief for dehorning under proposed standard S6.4; or any information to improve the estimation of costs?

As above in question 18. Continued efforts to increase polling remain a priority and will also deliver increased economic and operational efficiencies accepting the challenges faced in extensive production systems and certain breeds (incl bos indicus).

Public consultation question 20: Do you know the number or percentage of calves are currently being dehorned using caustic chemicals that would benefit from the conditions specified under proposed standard S6.5? Do you have any information to improve the estimation of costs?

No comment. N/A

Public consultation question 21: Do you know the number or percentage of businesses that would otherwise choose to apply caustic chemicals under the aforementioned conditions in the proposed standard S6.5 – and that are currently unable to do so? What would the typical cost savings be per-calf?

No comment. N/A



Northern Territory Cattlemen's Association

Public consultation question 22: Do you know the number or percentage of farm hands requiring training for spaying under proposed standard S6.7; or any information to improve the estimation of costs?

Estimated annual training and monitoring requirement is 30-50 people per year.

Page | 12

Public consultation question 23: Do you know the number or percentage of cattle requiring pain relief under proposed standard S6.8 for spaying or any information to improve the estimation of costs?

Very difficult to establish and no data exists. Estimated annual cattle numbers could be in the order of 30,000 per year.

Public consultation question 24: Do you know the number or percentage of cattle affected under proposed standard S6.9 to ban vaginal spreaders for small or immature cattle; or any information to improve the estimation of costs?

No comment / not applicable.

Public consultation question 25: Do you know the number or percentage of cattle inspections required under proposed standard S7.2 for the inspection of calving cows, additional costs or any information to improve the estimation of costs?

Open rangelands and extensive production systems balance free range / minimal intervention and are not conducive to inspection regimes associated with the farming and intensive production systems.

Public consultation question 26: Do you know the number or percentage of cattle affected under proposed standard S8.4 to improve hygiene or any information to improve the estimation of costs?

No comment. Largely relevant to dairy.

Public consultation question 27: Do you know the number or percentage of dairy cattle that are adversely affected by heat stress? Do you have any other information to improve the estimation of costs under the proposed standard S9.2?

No comment.

Public consultation question 28: Do you know the number or percentage of cattle affected under proposed standard S9.3 to severely limit tail docking to treat injury or disease, or any information to improve the estimation of costs?

No comment.



Northern Territory Cattlemen's Association

Public consultation question 29: Do you know the number or percentage of cattle that are adversely affected by poor diet in feed lots? Do you have any other information to improve the estimation of costs under the proposed standard S10.2?

No comment.

Page | 13

Public consultation question 30: Do you know the number or percentage of feedlots affected under proposed standard S10.2 for feed record keeping or any information to improve the estimation of costs?

No comment.

Public consultation question 31: Do you know the number or percentage of cattle in unaccredited feedlots that are affected by adverse welfare outcomes due to not being fed fresh feed each day as required under proposed standard S10.3?

No comment.

Public consultation question 32: Do you know the number or percentage of feedlots affected under proposed standard S10.4 to conduct heat risk assessments or any information to improve the estimation of costs?

No comment.

Public consultation question 33: Do you know the number or percentage of cattle affected under proposed standard S11.5 for humane killing; or any information to improve the estimation of costs?

No comment.

END