

## **PAM (Port Adelaide Monitors) – Submission to Animal Health Australia**

### **Australian Animal Welfare Standards and Guidelines – Cattle**

#### **Edition 1 – Public Consultation, Version 1.0**

**6 May 2013**

### **PART A - General Comments**

We appreciate the opportunity to comment on these proposed Standards and Guidelines. Whilst the transition from Codes of Practice to Standards and Guidelines has the potential to contribute to better animal welfare outcomes, we are concerned that the current version needs significant amendment if it is to reach this goal.

As members of the community in a participative/deliberative democracy we have several major concerns about these standards.

**Firstly, we are aggrieved that the Preface to these Standards describes them as “reflecting available scientific knowledge, current practice and community expectations”** - Since the scientific studies relied upon are largely industry funded and the Writing Group that formulated the standards excluded animal welfare groups and (animal interest) community members – this claim is inaccurate.

**Secondly, to serve the public interest it is crucial to disclose the organisations or interest groups that are participating, this draft does not** - In each step of this process from the Writing Group to the Reference Group to the group that will review the submissions received during the Public Consultation period, the organisations involved should be disclosed. It is also important that the process used to review submissions (from the Public Consultation) and determine which recommendations are incorporated into the Standards is made public. When certain groups of participants are excluded the legitimacy of the standards themselves is called into question.

**Thirdly, we believe that a key part of the role of these standards (and all law) is to address the weakest social norms and protect the most vulnerable interests , and these standards fail to do this -** In our view, the most vulnerable interests in this context are the animals of lowest financial value, typically the bobby calves, the ‘downers’, the old, the weak, the sick, the injured, the distressed, the dying and the animals who can’t move quickly or keep up with the mob. Standards regarding the treatment of these animals must be prescriptive and strong to protect them against the ongoing temptation for animal users to handle them roughly or neglect them in favour of caring for animals who will bring greater financial reward. These standards do not adequately protect the most vulnerable animals.

**Fourth, the proposed standards use of vague wording like ‘within a reasonable time’ or ‘a person must take reasonable actions to ensure the welfare of cattle..’ is unverifiable and unacceptable. In addition, these standards must clarify whose responsibility it is to meet the standard, including when it is a shared responsibility between a chain of people** - The community won’t accept the use of vague wording which will render the standard ineffective.

**Fifth, these proposed standards still use many outcome based type standards, despite the failure of this type of standard in the past** - Despite past problems with enforcing compliance with, and prosecuting non compliance of outcome based standards in this regulatory system, outcome based standards are still widely used. Principle-Prescriptive and Systems based standards are likely to be more effective in preventing cruelty/bad welfare outcomes since they compel animal users to take specific actions, which can prevent bad welfare outcomes. These more prescriptive types of standards potentially shift the focus so that animal users have to think about their duties (of care) to the animal rather than just focusing on a vaguely worded outcome. This adjustment would also be in line with animal law which is evolving away from a focus on the animal user's (negative duty) not to do harm to the animal, towards the animal users (positive) duty to provide for the animal's welfare needs.

**Sixth, the community believes that cattle of all ages are entitled to anaesthetic and appropriate post operative care for any procedure that may potentially cause them pain** – Their pain is no different to ours or to that of our companion animals.

**Seventh, the use of electric shock prodders on cattle undermines the intent of regulation that cattle be handled in a low stress manner** – and this is compounded by the fact that most cattle handling operations don't require staff to have reached any recognised benchmark in low stress animal handling.

**Eighth, the standards rarely require any prescriptive type of monitoring or inspection regime that is accompanied by documentation** – this is a missed opportunity to drive cruelty prevention by boosting industry's capacity to better recognise and more promptly address welfare challenges and to communicate these concerns through the chain of persons that are responsible for each animal in these enterprises.

**Ninth, the standards rarely require documented proof that persons handling animals have reached a certain benchmark of proficiency in the way that they handle animals before they are given this responsibility** – The community recognises that handling animals in a way that minimises their stress, whilst moving them efficiently through an agricultural enterprise is challenging; and therefore animal handlers must be trained to reach a required level of proficiency before care of these animals (and management of their own OHS risks) is entrusted to them.

**Tenth, standards that relate to the provision of an animal's basic welfare needs (i.e. adequate food and water, shelter, good handling, protection from predators, psychological wellbeing etc) must be strong and prescriptive (they're not optional)** – the proposed standards have left some of these core animal requirements as guidelines, as if they are optional.

**Eleventh, the proposed standards fail to include adequate definitions of concepts crucial to acceptable animal welfare, like for example, 'duty of care' and 'chain of responsibility'** – Part of the role of Standards is to educate about what good animal welfare requires and to help every person handling these animals understand that they have a shared legal duty of care to the animals under their control.

**Twelfth, Regulatory oversight of the way in which these standards are being developed, implemented, enforced and prosecuted should be performed by the proposed Independent Office of Animal Welfare** – the creation of this office has already been pledged to the Australian people by the labour party. Where is it? (*See suggested amendments to draft Standards below*)

## PART B – Suggested Amendments to Sections of Proposed Draft:

### PREFACE –

- The science used is not legitimate because it is not independently commissioned and the standards DO NOT meet community expectations.
- Object to fact that there was no representation from animal welfare groups or from ordinary members of the public in the writing group.
- For public interest purposes, you need to be transparent and state which organisations make up the Writers group, the reference group and the group that reviews the submissions from the public consultation. (also the members of Animal Health Australia and of the Standing Council on Primary Ind)

### INTRODUCTION –

- Past experience has shown that outcome based standards are very difficult to enforce and use to prosecute non compliance under.- so insert here: To optimize effectiveness, Standards in this document will be more prescriptive and will be principal, prescriptive based or systems based where possible!

### SECTION 1: RESPONSIBILITIES

#### Standards

S1.1 A person must take reasonable actions to ensure the welfare of cattle under their care.

**Comment [r1]:** Insert: according to principles of low stress animal handling and the person in charge's legal duty of care,

#### Guidelines

G1.1 Elements of responsibility for cattle management should include:

**Comment [r2]:** delete

- identifying distressed, weak, injured or diseased cattle, and taking appropriate action
- maintaining appropriate records

**Comment [r3]:** Insert: prompt

**Comment [r4]:** Insert: formal, written records of how all of their legal duty of care welfare obligations have been met.

G1.2 Agistment responsibilities should be documented, communicated and clearly understood by both parties.

G1.3 Owners, managers and stockpersons should have an appropriate staff induction program, periodically review existing practices, and be aware of new developments and training relevant to the welfare of cattle.

**Comment [r5]:** Convert to a Standard: replace should with must, and insert after the word program, 'that requires all those responsible for animals to meet nationally recognized benchmarks in low stress animal handling skills; how to meet their legal animal welfare obligations; animal welfare monitoring and procedures to respond to animal welfare problems

## SECTION 2: FEED AND WATER

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**Objective**

Cattle have access to feed and water to ~~minimise the risk to their welfare.~~

**Comment [r6]:** Satisfy their thirst and hunger and meet their physical needs

**Standards**

S2.1 A person in charge must ensure cattle have ~~reasonable~~ access to adequate and appropriate feed and water.

**Comment [r7]:** Constant

**Guide**

## lines

## Feed

G2.1 Feed supply for cattle should minimise harmful metabolic and nutritional conditions, and be

based on:

G2.2 Regular ~~assessment~~ should be made of the needs of the cattle in relation to the quantity and

quality of feed and water.

**Comment [r8]:** monitoring

G2.5 ~~Major~~ changes in diet ~~should~~ be introduced over an appropriate length of time and be closely monitored.

**Comment [r9]:** Convert to a Standard: and insert at beginning.. 'A person in charge must ensure that major...etc. – Then, replace should with are

G2.6 ~~Shy~~ feeders ~~should~~ be identified and managed appropriately.

**Comment [r10]:** Insert at beginning, 'A person in charge must ensure that shy feeders are...

G2.7 Cattle access to contaminated and spoilt feed, toxic plants and harmful substances should be avoided ~~or managed.~~

**Comment [r11]:** Delete

G2.8 ~~Self~~ feeders should be ~~checked~~, cleaned and maintained ~~regularly~~.

**Comment [r12]:** Convert to a Standard: Insert at beginning: A person in charge must ensure that.... And replace should with are. Replace regularly with at least every second day

G2.9 ~~An~~ appropriate fat/body condition score system should be used as a guide for the monitoring and planned feeding of cattle.

**Comment [r13]:** Convert to a Standard: replace should with must

## Water

G2.10 ~~Cattle~~ ~~should~~ have ~~reasonable~~ access to water at least daily.

**Comment [r14]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that, then delete should and reasonable

G2.11 Lactating cows, and all cattle in hot weather, ~~should~~ have ~~access~~ to water at least twice

**Comment [r15]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that, then delete should

daily. G2.12 Calves removed from cows ~~should~~ have access to water ~~at all times~~.

**Comment [r16]:** Insert: constant

G2.14 ~~Water~~ infrastructure ~~should~~ be inspected and maintained to allow effective provision of water in a reasonable time.

**Comment [r17]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that, then delete should and replace end with 'or appropriate formula at all times'.

**Comment [r18]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that...: replace should by must and insert 'at least weekly' after maintained

- 
- Calves and weaners

G2.17 Calves ~~should~~ receive adequate colostrum within 12 hours of birth, with the first feed occurring as soon as possible.

**Comment [r19]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that : replace should with must.

G2.18 Weaned calves ~~should~~ be provided with appropriate energy and protein supplements.

**Comment [r20]:** Add: Calves must have comfortable bedding and be protected from heat and cold

**Comment [r21]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that . Add to the end: As well as appropriate bedding and protection from the elements

**Comment [r22]:** Extra standard: The persons in charge must ensure that calves removed from cows are not denied food for any more than twelve hours

### SECTION 3: RISK MANAGEMENT OF EXTREME WEATHER ETC.....

#### Objective

Cattle are managed to minimise the impact of threats to their welfare including, extremes of weather, natural disasters, disease, injury and predation.

**Comment [r23]:** Add: distress

#### Standards

S3.1 A person in charge must take reasonable actions to ensure the welfare of cattle from threats, including \*extremes of weathers, \*drought\*, fires, floods, disease, injury and predation.

**Comment [r24]:** Add: distress

S3.2 A person in charge must ensure the \*inspections of cattle at intervals, and at a level appropriate to the production system and the risk to the welfare of cattle.

**Comment [r25]:** Add: And document

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

**Comment [r26]:** Insert after 'must': Demonstrate a formal procedure and documentation for daily monitoring and record keeping to ensure prompt and appropriate treatment....

#### Guidelines

##### Weather and natural disasters

- G3.1 ~~Plans to minimise risks to cattle welfare should include:~~
  - emergency contact details
  - breakdown or mechanical failure affecting feed, water, ventilation or milking
  - adverse weather — specifically, conditions that predispose cattle to heat or cold stress flood and fire insufficient supply of feed or water
- disease outbreak or injury
- emergency killing and disposal

**Comment [r27]:** Convert to a Standard: A person in charge must have physical evidence to verify that they have a cattle welfare risk management plan in place to deal with adverse weather and natural disasters, including:

**Comment [r28]:** A plan for humane emergency killing and disposal by trained persons

G3.3 ~~If practical, cattle should be provided with adequate shelter to minimise risks to welfare during inclement weather.~~

**Comment [r29]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that cattle are provided with adequate shelter to minimize welfare risks

Disease and injury

G3.6 **Appropriate** veterinary advice on cattle disease diagnosis, prevention or treatment ~~should be~~ sought as required.

**Comment [r30]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that... and replace should be with is

G3.7 **Cattle** ~~should~~ be vaccinated to protect against likely infectious diseases if there is a significant risk to the welfare of cattle.

**Comment [r31]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that... and replace should with are

G3.8 **Treatments** and vaccines ~~should be~~ administered in accordance with directions. Records of treatments ~~should~~ be kept.

**Comment [r32]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that. Replace should be with are, and replace should with must

G3.10 Internal and external parasites should be monitored and controlled.

G3.11 **Downer** cattle ~~shou ld~~ be assessed and treated without delay.

**Comment [r33]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that downer cattle are promptly identified, assessed and treated with respect. They must be handled or moved in a manner that minimizes their stress. The use of all goading implements, including electric shock prodders is prohibited on downer animals.

Predators

G3.12 **Predator** control programs ~~shou ld~~ be implemented where predation is a significant risk to the welfare of cattle.

**Comment [r34]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that....then replace should be with are

## SECTION 4: FACILITIES AND EQUIPMENT

Objective

Facilities and equipment are appropriate to minimise the risk to the welfare of cattle.

Standards

S4.1 A person in charge must take reasonable actions in the \*construction\*, maintenance and operation of \*facilities\* and equipment to ensure ~~the welfare of cattle.~~

**Comment [r35]:** That they meet their duty of care to cattle.

Guidelines

G4.1 **Facility** construction or modification ~~shou ld~~ take into account:

**Comment [r36]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that.... Then replace should take with takes

- cattle **behaviour**
- **space**
- **feed and water space requirements**

**Comment [r37]:** Add new dot point: hospital or treatment pens

**Comment [r38]:** Space for each animal to lie down simultaneously

**Comment [r39]:** Sufficient space for every animal to access feed and water

G4.3 **The** surfaces of yards, pens, tracks and laneways ~~shou ld~~ be constructed and maintained to minimise the risk of lameness, slips and falls.

**Comment [r40]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that.... And replace should with are

G4.4 **Facilities** should be free of protrusions and obstacles that may cause injury.

**Comment [r41]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that... and replace should with are

## Housed cattle

*Note:* Includes relatively low numbers of show cattle, bulls in preparation, cattle housed for research and dairy cattle housed in loose housing systems or free stalls, and at breeding establishments in single pens or small

- G4.6 **Faeces** and urine accumulations ~~should~~ be removed regularly.
- G4.7 **Housed systems** ~~should have hospital pens with a comfortable lying surface for sick or injured cattle, and the means to move downer cows to the hospital pen.~~
- G4.8 **A** normal diurnal pattern of lighting ~~should~~ be provided for indoor cattle.
- G4.9 **Cattle** ~~should~~ have the opportunity for appropriate exercise each day.
- G4.10 **Air** ~~should~~ be of acceptable quality with respect to dust, chemicals and smells. ~~Continuous periods of detectable smoke should be avoided.~~
- G4.11 **Concrete** flooring in rest areas ~~should~~ be covered by an appropriate depth of bedding material.
- G4.12 **Fire** alarms and adequate fire fighting equipment ~~should~~ be fitted and maintained in all indoor housing systems.

**Comment [r42]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that... and replace should with are

**Comment [r43]:** Convert to a Standard:: The persons in charge must ensure that housed systems have hospital pens with a comfortable lying surface, which must be used for sick or injured cattle. These systems must also have humane means for moving downer cattle to the hospital pen. If not moved to the hospital pen, downers must be penned in a comfortable area.

**Comment [r44]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that.... Replace should be with is

**Comment [r45]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that.... Replace should with must

**Comment [r46]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that.... Replace should with is to

**Comment [r47]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that.... Replace should with must

**Comment [r48]:** Convert to a Standard: Insert at beginning:: The persons in charge must ensure that

## SECTION 5: HANDLING AND MANAGEMENT

### Objective

Handling and management practices are appropriate ~~and minimise the risk to the welfare of cattle.~~

### Standards

**Comment [r49]:** To meet legal animal welfare obligations to the cattle and to minimise their stress and any risk to their welfare

- S5.1 A person ~~must handle cattle in a reasonable manner and must not:~~
- 1) ~~\*lift\* off the ground by only the head, ears, horns, neck or tail unless in an \*emergency\*; or~~
  - 2) ~~drop except to land and stand on its feet; or~~
  - 3) ~~strike in an unreasonable manner, punch or kick; or~~
  - 4) ~~drag cattle that are not standing, except in an \*emergency\*, for the minimum distance to allow safe handling, \*lifting\*, treatment or humane killing; or~~
  - 5) ~~deliberately dislocate or break the tail of cattle; or~~

**Comment [r50]:** In charge must handle cattle in a respectful and low stress manner and must not:

**Comment [r51]:**

**Comment [r52]:** For a distance of less than 3 feet....

**Comment [r53]:** Twist or pull

**Comment [r54]:** Including calves

S5.2 A person must not drive cattle to the point of collapse.

S5.3 ~~A person must consider the welfare of cattle when using an electric prodder, and must not use it~~

- 1) ~~on genital, anal, udder or facial areas of cattle; or~~
- 2) ~~on calves less than three months old, unless their welfare is at risk; or~~
- 3) ~~on cattle that are unable to move away; or~~
- 4) ~~in an unreasonable manner on cattle.~~

**Comment [r55]:** Electric prodders are prohibited on all cattle including calves

**Comment [r56]:** Muzzled and under effective control at all times during cattle handling

S5.4 A person in charge must have a dog ~~\*under effective control\*~~ at all times during the handling of cattle.

S5.5 A person in charge must ensure ~~a dog is muzzled when moving calves less than 30 days old that are without \*cows\*.~~

**Comment [r57]:** Is not used for moving calves that are less than 3 months old

S5.6 A person in charge must ~~ensure cattle are accustomed to tethering before they are tethered for long periods. A person in charge must ensure tethered cattle are able to exercise daily.~~

**Comment [r58]:** Not tether cattle

Electro-immobilisation

S5.7 A person ~~must only use \*electro immobilisation\* on cattle if:~~

**Comment [r59]:** Not use electro-immobilisation on cattle or calves

- 1) ~~the device is approved for use in the jurisdiction; and~~
- 2) ~~the cattle are more than six months old; and~~
- 3) ~~the operator is trained or it is done under \*direct supervision\* of a veterinarian or a trained person; and~~
- 4) ~~alternative restraining methods are not adequate to hold cattle sufficiently for the procedure being performed.~~

- 5) ~~S5.8 A person must not use \*electro immobilisation\* on cattle as an alternative to \*pain relief\*.~~

## Guidelines

### Handling and management

G5.1 ~~Cattle~~ should be handled quietly and calmly, taking into account their flight zone and natural herding instinct to minimise stress during handling. Allowances should be made for cattle with special needs such as young calves, lame ~~cattle~~ and bulls.

**Comment [r60]:** A person in charge must ensure that cattle are..... replace should with must

**Comment [r61]:** Sick or old animals, distressed animals and bulls

G5.3 Under paddock or extensive systems, the frequency of inspection should take into consideration:

- recent management ~~procedures~~.

**Comment [r62]:** Add dot point: Individual cattle who are distressed, disabled, sick, injured or unable to keep up with the mob

G5.5 ~~Handling~~ aids such as ~~drafting canes~~, flappers, flags, rattles or other noise makers ~~should~~ be used in preference to ~~other~~ strike objects to move cattle.

**Comment [r63]:** Convert to Standard: Persons in charge must ensure that ...Replace should with are

G5.6 ~~Use of dogs and electric prodders~~ should be limited to the minimum ~~necessary~~.

**Comment [r64]:** Dogs should only be used as a last resort

G5.7 ~~Cattle~~ being moved should be rested or allowed to slow if they show signs of exhaustion.

**Comment [r65]:** Convert to Standard: Persons in charge must ensure that ...Replace should be with are

G5.8 ~~Calves less than 30 days old should be handled with care because they may not have developed following behaviours, and may also become easily fatigued.~~

**Comment [r66]:** Convert to Standard: Persons in charge must ensure that calves are moved gently and patiently, in a manner that minimizes their stress...

G5.10 ~~Wounds~~ should be treated as soon as practicable to prevent infection and flystrike.

**Comment [r67]:** Convert to Standard: Persons in charge must ensure that wounds are treated promptly to prevent infection and flystrike

G5.13 ~~Hoof~~ paring should be limited to avoid damage to soft tissue.

**Comment [r68]:** Convert to Standard: Persons in charge must ensure that hoof paring is limited to avoid damage to soft tissue

G5.14 Permanent tethering ~~should be avoided~~.

**Comment [r69]:** Convert to Standard: Persons in charge must ensure that cattle are not permanently tethered

G5.15 ~~Instruments~~ should be maintained and in good working order.

**Comment [r70]:** Convert to Standard: Persons in charge must ensure that ...Replace should be with are

G5.17 ~~Unnecessary cattle handling should be avoided~~ during extreme weather.

**Comment [r71]:** Cattle should not be handled during extreme weather except in cases of emergency, like for example a fire

G5.19 Insect worry should be managed by implementing control measures where appropriate.

### ~~Electro immobilisation~~

G5.20 ~~Any benefits from using electro immobilisation on cattle should be judged against its aversive effects.~~

G5.21 ~~The lowest setting of current for electro immobilisation that produces restraint should be selected.~~

G5.22 ~~Operators using electro immobilisation should undertake formal training and assessment to a high level of competency.~~

G5.23 ~~Electro immobilisation should not be used for routine procedures as a substitute for feasible upgrading of handling facilities.~~

**Comment [r72]:** Delete

## Identification

~~G5.24 Hot iron branding of wet cattle should be avoided.~~

~~G5.25 The correct time period of application and temperature of the iron should be used when hot iron branding.~~

~~G5.26 Hot iron branding of weak or extremely thin cattle should be avoided.~~

~~G5.27 Care should be taken with the concurrent application of volatile pour-on treatments when hot iron branding or applying the electric prodder.~~

G5.28 Ear tagging and tattooing should be done in a way that minimises the risk of infection and tearing of the ear.

G5.29 Ear marking and tattooing instruments should be sharp and clean, with relevant hygienic techniques followed.

**Comment [r73]:** Convert to Standard: Persons in charge must ensure that ...Replace should be with is

**Comment [r74]:** Convert to Standard: Persons in charge must ensure that ...Replace should be with are

## SECTION 6: CASTRATION, DEHORNING AND SPAYING

S6.1 A person \*castrating\* or \*dehorning\* cattle must ~~have the relevant knowledge, experience and skills, or be under the \*direct supervision\* of a person who has the relevant knowledge, experience and skills.~~

**Comment [r75]:** Have documented evidence of training plus the practical skills to undertake these procedures, or must have a supervising person who has these qualifications standing next to them to supervise whilst s they perform the procedures

### Castration

S6.2 A person in charge must use ~~\*pain relief\* when \*castrating\* cattle, unless cattle are:~~

**Comment [r76]:** Effective anaesthetic and post operative care for castrating procedures on all cattle

1) ~~less than six months old; or~~

2) ~~less than 12 months old if at their first \*yarding\*, and where the later age is approved in the jurisdiction.~~

S6.3 A person must use ~~appropriate~~ tools and methods to \*castrate\* cattle.

**Comment [r77]:** Insert: well maintained tools

### Disbudding and dehorning

S6.4 A person in charge must use ~~\*pain relief\* when~~ \*dehorning\*, unless cattle are:

**Comment [r78]:** Effective anaesthetic and post operative care for dehorning all cattle

1) ~~less than six months old; or~~

2) ~~less than 12 months old if at their first \*yarding\* and where the later age is approved in the jurisdiction.~~

S6.5 ~~A person must consider the welfare of the \*calf\* when using \*caustic chemicals\* for \*disbudding\*, and must only use it if the \*calf\*:~~

1) ~~is less than fourteen days old; and~~

2) ~~can be segregated from its mother for four hours after treatment; and~~

3) ~~can be kept dry for 12 hours after treatment; and~~

4) ~~is not wet.~~

S6.6 A person must use **appropriate** tools and methods to \*dehorn\* cattle and \*disbud\* calves.

**Comment [r79]:** Only approved and well maintained

#### Spaying

56.7 A person \*spaying\* a scow\* must be a **veterinarian** or, if permitted in the jurisdiction, be ~~accredited or be under the \*direct supervision\* of a veterinarian or a person who is accredited.~~

**Comment [r80]:** And must use effective anaesthetic and post operative care

56.8 A person in charge must ~~use \*pain relief\* when performing~~ the \*flank approach\* for \*spaying\* or \*webbing\* of cattle.

**Comment [r81]:** Not use

56.9 A person must not use vaginal spreaders to \*spay\* small or immature female cattle.

#### Guidelines

G6.2 **Surgical** procedures ~~should be done with pain relief.~~ Operators should seek advice on current pain minimisation strategies.

**Comment [r82]:** Convert to Standard: Persons in charge must ensure that surgical procedures are done with effective anaesthetic and post operative care.

G6.4 **Good** hygiene practices should be implemented in relation to facilities, hands, handling and instruments. Disinfectant should be used and changed frequently.

**Comment [r83]:** Convert to Standard: Persons in charge must ensure that ...Replace should be with are

G6.6 **Equipment** for restraining cattle should only be used:

- for the minimum time necessary and with the minimum restraint necessary, when it is suitable
- if it is in good working order.

**Comment [r84]:** Convert to Standard: Persons in charge must ensure that ...Replace should only be with is

**Comment [r85]:** Convert to Standard: Persons in charge must ensure that ...Replace should be with is

G6.8 **Bleeding** from surgical wounds should be minimised by selecting an appropriate method, preventing overheating of calves and allowing them to settle after mustering.

**Comment [r86]:** Convert to Standard: Persons in charge must ensure that ...Replace should be with is

**Comment [r87]:** Convert to Standard: Persons in charge must ensure that cattle are inspected after surgical procedures and then at least every alternate day after that.

G6.9 **Infection** should be minimised by avoiding muddy or dusty yards, and wet weather.

**Comment [r88]:** Add Standard: Persons in charge must ensure that all cattle being castrated are provided with effective anaesthetic and post operative care

G6.11 ~~Cattle should be inspected regularly and with minimal disturbance~~ for signs of post-operative complications during the healing process, and appropriate action taken.

**Comment [r89]:** Convert to Standard: Persons in charge must ensure that calves are more than 2 days old when castrated.

#### Castration

G6.13 **Calves** should be more than 24 hours old when castrated.

**Comment [r90]:** Add Standard: Persons in charge must ensure that all cattle being disbudded or dehorned are provided with effective anaesthetic and post operative care

#### Disbudding and **dehorning**

G6.23 ~~Tipping should only remove~~ a solid, nonvascular portion of the horn, and result in a blunt horn end.

**Comment [r91]:** Convert to Standard: Persons in charge must ensure that tipping only removes...etc.

G6.24 ~~Horn regrowth or a scur that has a blunt horn end should not be dehorned or tipped.~~

**Comment [r92]:** Convert to Standard: Persons in charge must ensure that cattle with horn regrowth or a scur that has a blunt end are not dehorned or tipped

## Spaying

G6.25 The dropped ovary technique (DOT) for cattle spaying should be used in preference to other surgical methods, ~~where possible.~~

**Comment [r93]:** Add Standard: Persons in charge must ensure that all cattle being spayed are provided with effective anaesthetic and post operative care

**Comment [r94]:** Alternative to spaying should be adopted where possible

## SECTION 7: BREEDING MANAGEMENT

S7.3 A person in charge must ensure \*calving induction\* is done under veterinary ~~advice.~~

**Comment [r95]:** And that it is avoided where possible

S7.4 A person in charge must ensure that induced calves receive adequate colostrum ~~or be~~ ~~humanely killed at the first reasonable opportunity, and before they are 12 hours old.~~

**Comment [r96]:** And care or that they are humanely killed promptly, and before they are 12 hours old.

## Guidelines

G7.1 ~~Technicians~~ responsible for breeding management should ~~have~~ an understanding of the reproduction and behaviour of both the cow and the bull.

**Comment [r97]:** Convert to a Standard: Persons in charge must ensure that

## Cows and calves

G7.2 ~~In the last 4-6 weeks of pregnancy, management practices should~~ minimise stress on cows and reduce metabolic diseases.

**Comment [r98]:** Convert to a Standard: Persons in charge must ensure that in the last 4-6 weeks of pregnancy, management practices minimize stress on cows and reduce metabolic diseases. Cows being transported must be pregnancy tested to ensure that cows in last 4-6 of pregnancy are not transported.

G7.5 ~~Cows~~ that receive severe injuries during calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) ~~should~~ receive urgent treatment, or be humanely killed without delay.

**Comment [r99]:** Convert to a Standard: Persons in charge must ensure that ..... etc.

G7.6 ~~Weak~~ or orphaned calves with very little chance of survival ~~should be~~ humanely killed.

**Comment [r100]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should with are

G7.7 A cow's body condition should be considered when deciding when to wean the calf. ~~Induction of calving~~

G7.8 ~~Herd management strategies should be adopted to minimise or eliminate the need to induce calving.~~

G7.9 Cows subject to an induction program should be inspected twice daily. Any cow requiring calving assistance or treatment should receive this intervention at the first opportunity.

G7.10 Calving induction should only be done when necessary for the welfare of the individual cow or calf.

#### Bulls

G7.11 Bulls should be checked at regular intervals for injuries and disease.

G7.12 The welfare of teaser cattle used in bull-serving ability tests should be closely monitored.

**Comment [r101]:** Convert to a Standard: Persons in charge must ensure that bulls are checked regularly for injuries and disease

**Comment [r102]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should be with is

**Comment [r103]:** New Standard: Persons in charge must ensure that female cattle are not restrained for testing bulls reproductive ability

## SECTION 8: CALF REARING SYSTEMS

### Guidelines

G8.1 Calves removed from cows should receive adequate colostrum within 12 hours of birth, with the first administration occurring as soon as possible.

G8.3 If artificial feeding of new-born calves is required, the calves should be supervised until they are successfully trained to self-feed.

G8.6 Where there are two or more calves on a property, calves housed in single pens should be able to see neighbouring calves.

G8.7 Calves should be kept in the company of other calves from three weeks of age.

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G8.9 Solid feeds should be gradually introduced. Roughage should be provided to encourage the development of the rumen function from three weeks of age.

G8.10 Feeding equipment should be hygienically maintained.

G8.12 Floor area of 1.5-2.0 m<sup>2</sup> should be provided for each calf in group pens to permit self-grooming and prevent overcrowding. An area of 2.0m<sup>2</sup> should be provided for calves in individual pens.

G8.13 Calves should be raised in an environment that is:

- free of projections that may cause injury.

**Comment [r104]:** Convert to a Standard: Persons in charge must ensure that ..... etc.

**Comment [r105]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should be with are

**Comment [r106]:** Delete

**Comment [r107]:** Convert to a Standard: Persons in charge must ensure that solid feeds are gradually introduced. Roughage must be provided to encourage the development of the rumen function from three weeks of age.

**Comment [r108]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should with is

**Comment [r109]:** Convert to a Standard: Persons in charge must ensure that ..... etc.

**Comment [r110]:** Convert to a Standard: Persons in charge must ensure that ..... etc.

**Comment [r111]:** Add dot point: giving them some social stimulation

**Comment [r112]:** Offers them natural light and protection from heat, cold and dampness

**Comment [r113]:** Tail docking must only be performed by a vet for the purpose of treating injury or disease.

## SECTION 9: DAIRY MANAGEMENT

S9.3 A person must \*tail dock\* cattle only on veterinary advice and only to treat injury or disease.

S9.4 A person in charge must ensure dairy cattle that are kept on feed pads for extended periods

have access to a well-drained area for resting.

**Comment [r114]:** A vet must use effective anaesthetic and post operative care when they undertake tail docking procedures

Guidelines

G9.1 Milking machinery and equipment ~~should be~~ regularly tested and maintained.

**Comment [r115]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should with is

G9.2 The milking technique ~~should~~ minimise the risk of discomfort, injury and disease.

**Comment [r116]:** Convert to a Standard: Persons in charge must ensure that ..... etc.

G9.3 A lameness management strategy ~~should be~~ implemented and ~~should~~ include practices for prevention, early detection and effective treatment.

**Comment [r117]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace both shoulds with must

G9.4 Lameness assessment and/or hoof inspections ~~should be~~ conducted regularly and hoof trimming carried out when necessary.

**Comment [r118]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should with must

G9.5 A mastitis management strategy ~~should be~~ implemented and ~~should~~ include practices for prevention, early detection and effective treatment.

**Comment [r119]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace both should with must

G9.6 During hot weather, access to drinking water ~~should be~~ available at all times.

**Comment [r120]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should be with is

G9.7 Dairy operators should develop, document and implement routine management procedures to reduce the excessive heat load risks identified before they occur.

G9.8 Extra teats ~~should be expertly and hygienically removed as soon as they can be identified.~~

**Comment [r121]:** Convert to a Standard: Persons in charge must ensure that effective anaesthetic and post operative care is used for the removal of extra teats. Extra teats must only be removed by a vet, they should be removed as soon as they can be identified.

G9.9 Calving in free stalls ~~should be~~ avoided.

**Comment [r122]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should with is

SECTION 10: BEEF FEEDLOTS.

S10.2 A person in charge must ensure that the diet composition and quantities fed are recorded, and that records are maintained for the duration of the feeding period of each group of cattle.

**Comment [r123]:** And retained

S10.3 A person in charge must ensure feed is available daily to cattle in the \*beef feedlot\*.

**Comment [r124]:** Suitable, adequate and accessible daily to cattle in the beef feedlot

S10.4 A person in charge ~~must do a~~ \*risk assessment\* each year for the heat load risk at the feedlot, and implement appropriate actions to manage ongoing heat load risk.

**Comment [r125]:** Be able to produce documentation showing that they have conducted

S10.6 A person in charge must have a documented contingency plan in case of failure of feed or water supply, and ~~must~~ implement appropriate actions in the event of feed or water supply failure.

**Comment [r126]:** Be able to demonstrate how they have implemented...etc

S10.7 A person in charge must have a documented contingency plan in case of an emergency animal disease, and ~~must~~ implement appropriate actions in the event of an emergency animal disease.

**Comment [r127]:** Demonstrate how they've implemented

510.8 A person in charge must ensure the daily \*inspection\* of all cattle within the feedlot.

**Comment [r128]:** And record and retain

S10.9 A person in charge must ensure the appropriate management of calves born in the feed yards, to ensure the welfare of the calves.

**Comment [r129]:** The cows are given a protected comfortable place to calve, to ensure the welfare of cow and calf.

510.10 A person in charge must ensure the cleaning of feed yards and maintenance of surfaces on a planned basis, to ensure that pen surfaces can drain freely.

Guidelines

G10.1 ~~Feedlots should be~~ accredited under a third party, audited quality-assurance system.

**Comment [r130]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should be with are

G10.2 ~~Feedlot operators should~~ document aspects of a beef feedlot management plan that is not already required to be documented in the standards, including:

**Comment [r131]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Delete should

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- biosecurity/disease risk mitigation measures.

**Comment [r132]:** Add dotpoint: Details of all branding, surgical mutilations, spaying, castrations performed, including who performed them and the post operative care offered afterwards

G10.6 ~~New~~ arrivals to a feedlot should be closely inspected for injury and illness.

**Comment [r133]:** Add dotpoint: Details of CCTV coverage, who monitors it, procedures to follow in instances where non compliance has occurred (esp animal handling)

~~G10.9 Calves born in feed yards should be segregated with their mothers or humanely killed.~~

**Comment [r134]:** Add dotpoint: Details of the monitoring of the handling of all stockpersons handling animals and details of their humane handling credentials

Feed and water

G10.11 ~~Stale or spoiled feed should be removed daily.~~

**Comment [r135]:** Add dotpoint: Details of all treatment to injuries, sickness etc and details of humane destructions, including who performed them

G10.14 ~~Water troughs should be inspected daily and cleaned regularly.~~

**Comment [r136]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should be with are

G10.17 Heat load risk assessments should be documented and include:

- site climatic factors for the feedlot location
- animal factors including genotype, coat colour, days on feed and health status
- management factors, which may include the provision of shade, provision of additional water troughs, water temperature, ration type and manure management practices

**Comment [r137]:** Convert to a Standard: Persons in charge must ensure that calves born in feed yards are segregated with their mothers or promptly humanely killed

**Comment [r138]:** Convert to a Standard: Persons in charge must ensure that stale or spoiled food is removed daily

SECTION 11: HUMANE KILLING

Objective

Where it is necessary to kill cattle, it is done promptly, safely and humanely.

**Comment [r139]:** Convert to a Standard: Persons in charge must ensure that water troughs are inspected daily and regularly

**Comment [r140]:** adjustments

**Comment [r141]:** add 'respectfully'

Standards

S11.1 A person in charge must ensure killing methods for cattle result in rapid loss of consciousness, followed by death while unconscious.

**Comment [r142]:** used are only those allowed under regulation for cattle and that they result in rapid loss of consciousness, followed by death while unconscious. Cattle must not be killed by a blow to the head. If a firearm or captive bolt is used it must not hit the temporal position

S11.2 A person must have the relevant knowledge, experience and skills to be able to humanely kill cattle, or be under the direct supervision of a person who has the relevant knowledge, experience and skills, unless:

**Comment [r143]:** A person in charge must ensure that the person performing the killing possesses accreditation in humane killing that is verifiable and ....etc.

S11.3 A person in charge of cattle suffering from severe distress, disease or injury that cannot be reasonably treated must ensure that the cattle are killed at the first reasonable opportunity.

**Comment [r144]:** Standing next to the supervising person who is watching them. The supervising person must have documentation to verify their humane killing credentials and must demonstrate the relevant knowledge, experience and skills

S11.4 A person killing cattle must take reasonable action to confirm the animal is dead.

**Comment [r145]:** Insert: promptly and humanely by an accredited person

S11.5 A person killing a \*calf\* by a blow to the forehead must first ensure that the \*calf\* is less than 24 hours old.

**Comment [r146]:** Not leave the animal until they have noted no eye reflex movement, pulse or rhythmic breathing for three whole minutes.

## Guidelines

### Recommended humane killing methods for cattle

G11.1 Recommended methods of humane killing include:

- for adult cattle — close-range firearms use to the brain (including the temporal position) or captive bolt to the brain (see Figure11.1)

**Comment [r147]:**

**Comment [r148]:** Excluding

### Remove Temporal position and blunt trauma

G11.2 The preferred option for humane killing should be a firearm directed to the frontal position of the head.

**Comment [r149]:** Convert to a Standard: Persons in charge must ensure that humane killing by a firearm is carried out by directing the firearm to the frontal and not the temporal position

#### Note:

For adult cattle, a rifle should deliver at least the muzzle energy of a standard 0.22 magnum cartridge. For larger animals and bulls, 0.30 calibre high-power cartridges are recommended. For calves, a rifle should deliver at least the muzzle energy of a standard 0.22-long rifle cartridge.

### Confirming death in cattle after humane killing

G11.3 Three or more signs should be observed to determine whether the method used for humane killing has caused death.

**Comment [r150]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should be with have been

#### Note:

Signs of death include:

- loss of consciousness and deliberate movement

- absence of a corneal 'blink' reflex when the eyeball is touched, or maximum dilation of the pupil
- absence of rhythmic respiratory movements for at least three minutes
- absence of a heartbeat after three minutes
- absence of a pulse after three minutes.

#### Captive bolt devices

*Note:*

Captive bolt use on cattle ~~should be~~ in the frontal or poll positions and be accompanied by appropriate restraint followed by an effective procedure, if necessary, to ensure death.

The captive bolt stunner ~~should be~~ pressed firmly on the head before being discharged, and ~~should be positioned as described in the approved positions for cattle. The temporal position should be avoided.~~

For penetrating captive bolt stunners, the cartridge power and length of bolt should be appropriate to the class of cattle. ~~Non-penetrating captive bolt stunners are not recommended.~~

**Comment [r151]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace should with is

**Comment [r152]:** Convert to a Standard: Persons in charge must ensure that the captive bolt stunner is pressed firmly on the head before being discharged, and it is positioned as described in the approved positions for cattle. The temporal position is prohibited.

**Comment [r153]:** Convert to a Standard: Persons in charge must ensure that penetrating captive bolt stunners have the required cartridge power and length of bolt for the class of cattle being killed.  
**INSERT A TABLE HERE GIVING THE APPROPRIATE CARTRIDGE POWER AND BOLT LENGTHS FOR EACH CLASS OF CATTLE**

**Comment [r154]:** Convert to a Standard: The use of non-penetrating captive bolt stunners is not permitted. Persons in charge must ensure that non penetrating captive bolt stunners are not used

## Bleeding out (exsanguination)

G11.4 Bleeding out of unconscious cattle ~~should~~ be done using a suitable, sharp knife. The thoracic stick method ~~should~~ be used.

*Note:*

Bleeding out (exsanguination) is done by cutting the main blood vessels at the top of the heart via the thoracic inlet (chest stick), in the neck (neck cut) or in other locations.

**Comment [r155]:** Convert to a Standard: Persons in charge must ensure that ..... etc. Replace shoulds with must

## GLOSSARY

animal welfare            The state of an animal and how well it is coping with the conditions in which it lives.

ADD 'strike' and 'duty of care' and 'chain of responsibility' to the glossary

**Comment [r156]:** Needs further definition in order for some standards to be verifiable. After the word 'lives', add - Acceptable animal welfare requires that the animal has an appropriate body score and the opportunity to behave normally; and that it is free from distress, sickness, disease and injury. Persons responsible for cattle must take action to prevent distress, sickness, disease or injury and to treat it promptly and adequately if it occurs. Animals in an acceptable state of welfare should be experiencing a reasonable level of wellbeing.

