



RSPCA South Australia

Submission to
Animal Health Australia

Australian Animal Welfare Standards & Guidelines

CATTLE

Edition One
Public Consultation Version 1.0

6 May 2013

A. GENERAL COMMENTS

- i. It is recognised that many Standards are described as ‘outcome based’, resulting in confusion and misunderstanding, as well as posing difficulties for prosecution. These need to be revised and modified accordingly.
- ii. Under Purpose on page 4, paragraph 2, last sentence it states that the standards reflect community expectations. Given that the writing group does not include a community representative or that many standards reflect industry imperatives rather than community concerns, this claim lacks evidence.
- iii. Under Scope on page 4, paragraph 3, replace ‘farming’ with ‘agricultural’ and add ‘feedlots’ after ‘establishments’.
- iv. Under Scope on page 5, paragraph 2, delete ‘animal welfare’ after unacceptable as this sentence should relate to any practice.
- v. Under Development process on page 5, 2nd sentence, there is no reference to animal welfare organisations or representatives. This should be clarified in that either ‘animal welfare’ is specified if there is a representative from this nongovernment organisation or if the reference group isn’t also guided by animal welfare representatives, then this must be rectified, otherwise the whole process is flawed and unacceptable. Also, there should be a description of the next steps involved in reviewing and collating the feedback from the public consultation process.
- vi. Under Interpretation, on page 6, under Standards – the animal welfare ADD ‘Legal’ before requirements AND after met under law REPLACE ‘*for livestock welfare purposes*’ WITH ‘*to help safeguard animal welfare*’.
- vii. Under Interpretation, on page 6, under Standards, after sentence ending ... ‘*to be made for some circumstances*’. ADD ‘*Principle/prescriptive or systems-based standards will be used where possible, especially in instances where it may be difficult to prosecute non-compliance with an outcome based standard.*’
- viii. Under Principles for cattle welfare, on page 7, 4th dot point after ... ‘*their limbs*’, ADD ‘*walk freely*’. 12th dot point after end of sentence ADD ‘and where other options have been considered but not able to be used’.
- ix. Under Principles for cattle, add dot point ‘*Regular monitoring of the handling and welfare of animals and prompt response to remedy problem.*’
- x. The process following the closure of the public submissions to finalise the S&G document should be described.
- xi. Page 8, ADD sentence after last sentence, ‘*Pain relief must be administered if it is likely that a procedure or situation will cause pain.*’

Glossary

Pge 36, to add detail to the definition of 'animal welfare' in the Glossary, so that standard s1.1 on page 9 (i.e. 'A person must take appropriate actions to ensure the welfare of cattle under their care') is more verifiable/enforceable:

- Animal welfare - The state of an animal and how well it is coping with the conditions in which it lives. Acceptable animal welfare requires that the animal has an appropriate body score and the opportunity to behave normally and experience well-being; and that it is free from distress, sickness, disease and injury. It requires the responsible person to take action to prevent distress, sickness, disease or injury and to treat it promptly and adequately if it occurs.

B. SECTIONS

1. Responsibilities

Objective: SUPPORTED

Standards:

S1.1 SUPPORTED

Guidelines:

G1.1, G1.2, G1.3 SUPPORTED

2. Feed and Water

Objective: MODIFY

Cattle have access to ADD 'APPROPRIATE' feed and water to ~~minimise the risk to their welfare~~ REPLACE WITH '*prevent hunger and thirst and to meet physiological requirements*'.

Standards:

S2.1 SUPPORTED

Additional Standards converted from Guidelines:

S2.2 (G2.8 TO BECOME S2.2)

A person in charge must ensure that self feeders are checked, cleaned and maintained at least weekly.

S2.3 (G2.9 TO BECOME S2.3)

A person in charge must ensure that an appropriate fat/body condition score system is used for the monitoring and planned feeding of cattle.

S2.4 (G2.10 TO BECOME S2.4)

A person in charge must ensure that cattle have access to water daily.

- S2.5 (G2.11 TO BECOME S2.5)
A person in charge must ensure that lactating cows, and all cattle in hot weather, have access to water at least twice daily.
- S2.6 (G2.12 TO BECOME S2.6)
A person in charge must ensure that calves removed from cows have access to water at all times.
- S2.7 (G2.14 TO BECOME S2.7)
A person in charge must ensure that water infrastructure is inspected and maintained at least weekly to allow effective provision of water.

Additional Standards:

- S2.8 A person in charge must ensure that calves removed from cows but younger than 1 year, and pregnant or lactating cows are not denied access from adequate and appropriate feed for more than 24 hours and for other classes of cattle for no more than 48 hours.

Guidelines:

G2.1, G2.2, G2.3, G2.4, G2.5, G2.6, G2.7, G2.13, G2.15, G2.16, G2.17, G2.18 SUPPORTED

3. Risk Management of extreme weather, natural disasters, disease, injury and predation

Objective: SUPPORTED

Standards:

- S3.1 MODIFY
A person in charge must take reasonable actions to ensure the welfare of sheep from threats, including extremes of weather, drought, fires, floods, disease, injury, INSERT 'distress' and predation.
- S3.2 MODIFY
A person in charge must ensure the inspection of cattle at intervals INSERT 'is documented and demonstrated', at a level appropriate to the risk to the welfare of cattle and to the production system. NOTE: PUT RISK BEFORE PRODUCTION SYSTEM.
- S3.3 MODIFY
A person in charge must ensure treatment for sick, injured, INSERT 'distressed', or diseased cattle at the first REMOVE 'reasonable' opportunity.

Additional Standards:

- S3.4 (G3.1 TO BECOME S3.4)
A person in charge must ensure INSERT 'and demonstrate' that INSERT 'documented' action plans are in place to prevent and/or minimise the risks to cattle welfare and must 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
- Flood or fire
- Insufficient supply of feed or water
- Disease outbreak or injury
- Emergency killing and disposal
- Other issues specific to the enterprise or cattle being managed.

S3.5 (G3.3 TO BECOME S3.5)

The person in charge must ensure that cattle are provided with adequate shelter to minimise risks during inclement weather.

S3.6 (G3.6 TO BECOME S3.6)

The person in charge must ensure that appropriate veterinary advice on cattle disease diagnosis, prevention or treatment is sought as required.

S3.7 (G3.7 TO BECOME S3.7)

The person in charge must ensure that cattle are vaccinated to protect against likely infectious diseases if there is a significant risk to the welfare of cattle.

S3.8 (G3.8 TO BECOME S3.8)

The person in charge must ensure that treatments and vaccines are administered in accordance with directions and that records of such treatments are kept.

S3.9 (G3.11 TO BECOME S3.9)

The person in charge must ensure that downer cattle are assessed, INSERT '*handled respectfully in a manner that minimizes their stress*' and treated appropriately without delay.

Guidelines:

G3.2, G3.4, G3.5, G3.9, G3.10, G3.12 SUPPORTED

4. Facilities and equipment

Objective: SUPPORTED

Standards:

S4.1 SUPPORTED

Additional Standards converted from Guidelines:

S4.2 (G4.3 TO BECOME S4.2)

The person in charge must ensure that the surfaces of yards, pens, tracks and laneways are constructed and maintained to minimize the risk of lameness, slips and falls.

S4.3 (G4.4 TO BECOME S4.3)

The person in charge must ensure that facilities are free of protrusions and obstacles that may cause injury.

- S4.4 (G4.6 TO BECOME S4.4)
The person in charge must ensure that faeces and urine accumulations are removed at least weekly.
- S4.5 (G4.7 TO BECOME S4.5)
The person in charge must ensure that housed systems have hospital pens with a comfortable lying surface to be used for sick or injured cattle.
- S4.6 (G4.9 TO BECOME S4.6)
The person in charge must ensure that a normal diurnal pattern of lighting is provided to indoor cattle.
- S4.7 (G4.9 TO BECOME S4.7)
The person in charge must ensure that cattle have the opportunity for appropriate exercise each day.
- S4.8 (G4.10 TO BECOME S4.8)
The person in charge must ensure that air is of an acceptable quality with respect to dust, chemicals, odours and smoke.
- S4.9 (G4.11 TO BECOME S4.9)
The person in charge must ensure that concrete flooring in rest areas is covered by an adequate depth of appropriate bedding material.
- S4.10 (G4.12 TO BECOME S4.10)
The person in charge must ensure that fire alarms and adequate fire fighting equipment should be fitted and maintained in all indoor housing systems.

Additional Standard:

- S4.11 Cattle are not to be maintained in single pens for commercial production systems.

Guidelines:

- G4.7 MODIFY
Downer cows should either be moved to a hospital pen or provided with a comfortable, safe area.

G4.1, G4.2, G4.5 SUPPORTED

5. Handling and management

Objective: SUPPORTED

Standards:

- S5.1 MODIFY
(3) DELETE '*in an unreasonable manner*' after '*strike*'.
ADD '*Strike*' to be defined in glossary as 'to hit with force'.
(5) DELETE '*deliberately*'

S5.2 SUPPORT

S5.3 MODIFY

Electric prodders must not be used on cattle.

S5.4 SUPPORTED

S5.5 MODIFY

A person in charge must ensure that dogs are not used when handling unweaned calves.

S5.6 MODIFY

Cattle must not be tethered.

S5.7 MODIFY

Electro-immobilisation must not be used on cattle.

S5.8 DELETE

S5.9 SUPPORTED

S5.10 SUPPORTED

Additional Standard:

S5.11

A person in charge must ensure that an earmark is not used to identify cattle.

S5.12

A person in charge must ensure that hot iron branding is not used to identify cattle.

Additional Standards converted from Guidelines:

S5.13 (G5.1 [first sentence] TO BECOME S5.13)

A person must handle cattle quietly and calmly, taking into account their flight zone and natural herding instinct to minimize stress during handling.

S5.14 (G5.1 [second sentence] TO BECOME S5.14)

A person handling cattle must take extra care for cattle with special needs such as young calves, lame cattle, *pregnant cows*, bulls and *distressed or old animals that can't keep up with the mob*.

S5.15 (G5.7 TO BECOME S5.15)

A person must allow cattle to rest or to slow if they show signs of exhaustion.

S5.16 (G5.8 TO BECOME S5.16)

A person must handle calves less than 30 days old gently and in a manner that minimises stress.

S5.17 (G5.13 TO BECOME S5.17)

A person must not cause damage to soft tissue when foot paring.

S5.18 (G5.10 TO BECOME S5.18)

A person in charge must ensure that wounds are treated promptly and appropriately to prevent infection.

S5.19 (G5.15 TO BECOME S5.19)

A person in charge must ensure that instruments used for husbandry procedures are maintained and in good working order.

S5.20 (G5.28 TO BECOME S5.20)

A person in charge must ensure that ear tagging and tattooing is done in a way that minimizes the risk of infection and tearing of the ear.

S5.21 (G5.29 TO BECOME S5.21)

A person in charge must ensure that (DELETE 'ear marking') tattooing instruments are sharp and clean, and that hygienic techniques are used.

Guidelines:

G5.5 MODIFY

If handling aids are used, then drafting canes, flappers, flags, rattles and other noise makers are recommended.

G5.6 MODIFY

Use of dogs DELETE '*and electric prodders*' should REPLACE '*be limited to the minimum necessary*' WITH '*not be used routinely*'.

G5.16 MODIFY

After husbandry procedures, appropriate management should be undertaken to ensure effective mothering-up of calves at foot.

G5.17 MODIFY

Cattle should not be handled during extreme weather.

G5.2, G5.3, G5.4, G5.9, G5.11, G5.12, G5.16, G5.18

SUPPORTED

G5.14, G5.20, G5.21, G5.22, G5.23, G5.24, G5.25, G5.26, G5.27

DELETE

6. Castration, dehorning and spaying

Objective: SUPPORTED

Standards:

S6.1 MODIFY

A person castrating or dehorning cattle must INSERT '*be trained and demonstrate they*' have the relevant knowledge, experience and skills, or be under the direct supervision of a person who has the relevant knowledge, experience and skills.

S6.2 MODIFY

A person in charge must use pain relief when castrating cattle. DELETE ALL THEREAFTER.

S6.3 SUPPORT

S6.4 MODIFY

A person in charge must use pain relief when dehorning cattle. DELETE ALL THEREAFTER'.

S6.5 MODIFY

A person must INSERT '*not use caustic chemicals to disbud calves*'. DELETE ALL THEREAFTER'.

S6.6 SUPPORTED

S6.7 MODIFY

A person spaying a cow must be a veterinarian INSERT '*and use pain relief*'. DELETE ALL THEREAFTER.

S6.8 MODIFY

A person in charge must INSERT '*not*' use DELETE '*pain relief when performing*' the flank approach for spaying or webbing of cattle.

S6.9 SUPPORTED

Additional Standards converted from Guidelines:

S6.10 (G6.6 TO BECOME S6.10)

A person must only use equipment to restrain cattle;

- For the minimum time necessary and with the minimum restraint necessary, when it is suitable AND
- If it is in good working order.

S6.11 (G6.11 TO BECOME S6.11)

A person in charge must ensure that cattle are inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken if there are signs of pain, bleeding or infection.

S6.12 (G6.13 TO BECOME S6.12)

A person in charge must ensure that calves are more than 24 hours old when castrated.

S6.13 (G6.23 TO BECOME S6.13)

A person in charge must ensure that tipping only removes the solid, nonvascular portion of the horn resulting in a blunt horn end.

S6.14 (G6.24 TO BECOME S6.14)

A person in charge must ensure that horn regrowth or a scur that has a blunt end is not dehorned or tipped.

Guidelines:

G6.1, G6.2, G6.3, G6.4, G6.5, G6.7, G6.8, G6.9, G6.10, G6.12,
G6.14, G6.15, G6.16, G6.17, G6.18, G6.19, G6.20, G6.21, G6.25 SUPPORTED

G6.22 Not relevant if caustic chemicals not permitted to be used to disbud calves. DELETE

Additional Guideline:

G6.26 Non-invasive alternatives to spaying should be implemented, such as control oestrus and conception or segregation of cows and heifers from bulls; pregnant cows and heifers should be identified and provided with appropriate feed.

7. Breeding management

Objective: SUPPORTED

Standards:

S7.1 SUPPORTED

S7.2 SUPPORTED

S7.3 MODIFY

A person in charge must ensure INSERT *'that routine'* calving induction is INSERT *'not'* done DELETE *'under veterinary advice'*

S7.4 MODIFY

A person in charge must ensure that induced calves receive adequate colostrum INSERT *'and special care'*, or be humanely killed at the first reasonable opportunity, and before they are 12 hours old.

Additional Standards converted from Guidelines:

S7.5 (G7.1 TO BECOME S7.5)

Technician responsible for breeding management must be accredited and have an understanding of the reproduction and behavior of both the cow and the bull.

S7.6 (G7.5 TO BECOME S7.6)

A person in charge must ensure that cows that receive severe injuries during calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) receive urgent and appropriate treatment, or are humanely killed without delay.

S7.7 (G7.6 TO BECOME S7.7)

A person in charge must ensure that weak or orphaned calves with very little chance of survival are promptly and humanely killed.

Additional Standard:

S7.8 A person must not restrain cows or heifers for bull serving capacity tests.

Guidelines:

G7.4 MODIFY

For 2nd and 3rd dot points, REPLACE 'avoiding' with 'not'.

G7.2, G7.3, G7.7, G7.11, G7.12 SUPPORTED

Induction of calving – G7.8, G7.9, G7.10 DELETE as routine calving must not be done.

8. Calf-rearing systems

Objective: SUPPORTED

Standards:

S8.1 SUPPORTED

S8.2 MODIFY

A person must ensure calves that are housed in pens can turn around, lie down and fully stretch their limbs INSERT 'and be able to walk freely to exercise'.

S8.3 SUPPORTED

S8.4 SUPPORTED

Additional Standard:

S8.5 A person in charge must ensure calves are not housed individually for commercial purposes.

Additional Standards converted from Guidelines:

S8.6 (G8.1 TO BECOME S8.6)

A person in charge must ensure that calves that are removed from cows receive colostrum within 12 hours of birth, with the first administration occurring as soon as possible.

S8.7 (G8.3 TO BECOME S8.7)

A person in charge must ensure that if artificial feeding of new-born calves is required, the calves are supervised until they are successfully trained to self-feed.

S8.8 (G8.9 TO BECOME S8.8)

A person in charge must ensure that solid feeds are gradually introduced and roughage is provided to encourage the development of the rumen function from three weeks of age.

S8.9 (G8.10 TO BECOME S8.9)

A person in charge must ensure that feeding equipment is hygienically maintained.

S8.10 (G8.11 TO BECOME S8.10)

A person in charge must ensure that calves that become sick are placed in a hospital pen and treated immediately.

S8.11 (G8.12 TO BECOME S8.11)

A person in charge must ensure that a minimum floor area of 1.5-2.0m² is provided for each calf in group pens.

S8.12 (G8.13 TO BECOME S8.12)

A person in charge must ensure that calves are raised in an environment that is;

- Clean
- Dry
- Well drained
- Provided with sufficient bedding
- Draught free and well ventilated
- Free from projections that may cause injury
- Protected from weather extremes
- Provided with natural light

Guidelines:

G8.2 MODIFY

The colostrum should be of high quality.

G8.4, G8.5, G8.8, G8.14, G8.15 SUPPORTED

G8.6, G8.7 DELETE - as S8.5 prohibits calves from being housed individually for commercial purposes.

Additional Guideline:

G8.16 Calves should be weaned from cows in a manner which minimizes distress

9. Dairy management

Objective: SUPPORTED

Standards:

S9.1 SUPPORTED

S9.2 SUPPORTED

S9.3 MODIFY

DELETE 'A person must tail dock cattle only on veterinary advice' INSERT 'Tail docking must only be performed by a veterinarian' and only to treat injury or disease.

S9.4 SUPPORTED

Additional Standards converted from Guidelines:

- S9.5 (G9.1 TO BECOME S9.5)
A person in charge must ensure that milking machinery and equipment is regularly tested and maintained.
- S9.6 (G9.8 TO BECOME S9.6)
A person in charge must ensure that extra teats are hygienically removed by a veterinarian using pain relief.
- S9.7 (G9.9 TO BECOME S9.7)
A person in charge must ensure that calving in free stalls does not occur.

Guidelines:

G9.2, G9.3, G9.4, G9.5, G9.6, G9.7 SUPPORTED

10. Beef feedlots

Objective: SUPPORTED

Standards:

S10.1, S10.2, S10.5, S10.6, S10.7, S10.10 SUPPORTED

S10.3 MODIFY

A person in charge must ensure INSERT '*appropriate and adequate*' feed is available daily to cattle in the beef feedlot.

S10.4 MODIFY

A person in charge must do INSERT '*and document*' a risk assessment each year for the heat load risk at the feedlot, and implement appropriate actions to manage ongoing heat load risk.

S10.8 MODIFY

A person in charge must ensure INSERT '*and record*' the daily inspection of all cattle within the feedlot.

S10.9 MODIFY

A person in charge must ensure REPLACE REMAINDER OF SENTENCE WITH '*pregnant cows are identified and placed in a safe, comfortable area to calve and that appropriate management of newborn calves is provided to ensure their welfare*'.

Additional Standards converted from Guidelines:

S10.11 (G10.1 TO BECOME S10.11)

A person in charge must ensure that feedlots are accredited under a third party, audited quality-assurance system.

S10.12 (G10.6 TO BECOME S10.12)

A person in charge must ensure and document that new arrivals to a feedlot are closely inspected for injury and illness within 24 hours of arrival.

S10.13 (G10.14 TO BECOME S10.13)

A person in charge must ensure that water troughs are inspected daily and maintained in a clean condition.

Guidelines:

G10.9 MODIFY

Calves born in feed yards should be segregated with their mothers or INSERT '*promptly*' humanely killed.

G10.17 MODIFY - 3rd dot point

- management factors, which may include the provision of shade, provision of additional water troughs, INSERT '*ensuring appropriate*' water temperature, INSERT '*provision of appropriate*' ration type and manure management practice.

G10.2, G10.3, G10.4, G10.5, G10.7, G10.10, G10.11,
G10.12, G10.13, G10.15, G10.16, G10.18. G10.19

SUPPORTED

G10.8 DELETE- as covered under S10.9

11. Humane killing

Objective: SUPPORTED

Standards:

S11.1 SUPPORTED

S11.3 SUPPORTED

S11.2 MODIFY

A person must INSERT '*be trained and demonstrate*' the relevant knowledge.

S11.3 MODIFY

DELETE 'reasonable'

S11.4 MODIFY

REPLACE 'reasonable' WITH 'appropriate'

S11.5 MODIFY

A person INSERT '*must not kill any cattle*' by a blow to the forehead. DELETE ALL THEREAFTER

Additional Standards converted from Guidelines:

S11.6 (G11.3 TO BECOME S11.6)

A person must ensure that three or more of the following signs are observed to determine whether the method used for humane killing caused death;

INSERT THE NOTE '*Signs of death include:* [all dot points] LISTED ON PAGE 34 HERE.

S11.7 (G11.4 TO BECOME S11.7)

A person must ensure that bleeding out of unconscious cattle is done using a suitable, sharp knife and that the thoracic stick method is used.

Guidelines:

G11.2 MODIFY

Move subheadings and associated sections for Firearms and Captive bolt devices under G11.2 before Note: For adult cattle, a rifle.....

Under Captive bolt devices, REPLACE '*be accompanied by*' with '*done only with*' appropriate restraint