

Submission by Sentient, The Veterinary Institute for Animal Ethics, on the draft Australian Animal Welfare Standards and Guidelines for Cattle. (Edition One, Public Consultation Version 1.0, 21 February 2013).

General comments on standards and guidelines

- If these are to be regulated standards, there is an inherent implication that such standards will be enforced. Many of the standards contained in this document are 'motherhood statements' which are difficult to audit, more difficult to enforce and are therefore open to interpretation by the courts.
- Edition One needs far greater consultation with law enforcement agencies.
- This edition also lacks any review of the scientific literature on cattle welfare and husbandry.

Introduction

- 'Scope' (p5 paragraph 1): 'Where there is a conflict with another standard in meeting the livestock welfare standards, the welfare of livestock must be the first consideration unless there is a work health and safety requirement.' This statement requires clarification. For instance, would the welfare of livestock be placed above biosecurity risks or emergency situations?
- 'Scope' (p5 paragraph 3) – Advice or assistance with welfare management or disease control is not so readily available as this document suggests. Concerning trends are the reduction of funding of staff in agriculture departments nationally and the shift away from preventative work.
- Page 7, final paragraph – The term 'reasonable' needs further definition as it is applied here to the level of reduction of behavioural and physiological responses to a painful stimulus. Does 'reasonable' refer to a reasonable threshold for an animal to tolerate, or reasonable in consideration of the procedure being applied to the animal?
- Page 8, first paragraph – 'In considering the use of pain relief, cattle should be given the benefit of the doubt.' Suggested addition: 'and decisions should be made in line with current veterinary recommendations'. *Note: not all veterinarians would be familiar with the most current knowledge about pain assessment and pain relief in cattle. Therefore, there is a risk of continuing to apply outdated recommendations unless standards such as these are clearly specified and audited.*

1) Responsibilities

- Objective: 'A person knows their responsibilities for cattle welfare and is **competent** (not 'able') to perform the required tasks to minimise the risk to the welfare of cattle.'
- G1: The following responsibilities should be standards rather than guidelines:
 - Planning and undertaking actions for the enterprise to meet the welfare standards and address contingencies that may arise
 - Assessing the quantity, quality and continuity of feed and water supply

- Handling to minimise stress, and using handling aides, facilities and other equipment appropriately
 - Undertaking hygienic practices for husbandry procedures in a manner that minimises the risks to cattle welfare
 - Understanding and following chemical and drug treatment instructions for cattle
 - Identifying distressed, weak, injured or diseased cattle, and taking appropriate action
 - Humanely killing cattle by appropriate methods, or seeking the assistance of someone who is capable and equipped to kill them humanely
- G1.2: 'Agistment responsibilities should be documented, communicated and clearly understood by both parties.' Also needs a standard such as 'Responsibilities and lines of communication regarding the care of cattle must be clearly identified.'

2) Feed and water

- S2.1: 'A person in charge must ensure cattle have access (not 'reasonable access') to adequate and appropriate feed and water.'
- G2.1: This should be a standard(S2.2) and should read as follows: 'Feed supply for cattle **must** (not 'should') minimise harmful metabolic and nutritional conditions ...'
- G2.2: This should be a standard (S2.3) and should read as follows: 'Regular assessment **must** (not 'should') be made of the needs of the cattle in relation to the quality and quantity of feed and water.'
- G2.5: This should be a standard (S2.4) and should read as follows: 'Major changes in diet **must** (not 'should') be introduced over an appropriate length of time and be closely monitored.'
- G2.9: This should be a standard (S2.5) and should read as follows: 'An appropriate fat/body condition score system **must** (not 'should') be used as a guide for the monitoring and planned feeding of cattle. **Cattle must be maintained at a body condition score of at least 2 where reasonably possible and a body condition score of at least 4 for dairy cattle.'**
- G2.10: This should be a standard (S2.6) and should read as follows: 'Cattle **must** (not 'should') have reasonable access to water at least daily.'
- G2.11: This should be a standard (S2.7) and should read as follows: 'Lactating cows, and all cattle in hot weather, **must** (not 'should') have access to water at least twice daily.'
- G2.12: This should be a standard (S2.8) and should read as follows: 'Calves removed from cows **must** (not 'should') have access to water at all times, **except during situations such as yarding/penning, mustering or transport.'**
- G2.15: This should be a standard (S2.9) and should read as follows: 'Medicated water systems **must** (not 'should') be closely monitored to ensure cattle are not overdosed.'
Note: this impacts on market access and related to the Ag Vet Chem Act.
- G2.17: This should be a standard (S2.10) and should read as follows: 'Calves **must** (not 'should') receive adequate colostrum within 12 hours of birth, with the first feed occurring as soon as possible. **Calves must receive this by suckling their mothers when possible.'**
- G2.18: This should be a standard (S2.11) and should read as follows: 'Weaned calves **must** (not 'should') be provided with appropriate energy and protein supplements.'

3) Risk management of extreme weather, natural disasters, disease, injury and predation

- G3.1: This should be a standard (S3.4) and should read as follows: 'Plans to minimise risks to cattle welfare **must** (not '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
 - other issues specific to the enterprise or cattle being managed

- G3.2: Renumber as G3.1. 'Drought strategies should be prepared in advance.' The following should be a standard (S3.5): '**Drought strategies must** (not 'should') **be** progressively implemented before paddock feed runs out, and **must** (not 'should') include:
 - Relocation
 - Supplementary feeding
 - Use of stock containment areas
 - Segregation according to risk
 - Early weaning

- Suggest further standard (S3.6): '**Where drought strategies prove ineffective in ensuring appropriate cattle welfare, a decision must be made to sell, agist or humanely kill animals.**'
- G3.3: This should be a standard (S3.7) and should read as follows: 'Cattle **must** (not 'If practical, cattle should') be provided with adequate shelter to minimise risks to welfare during inclement weather.'
- G3.4: Renumber as G3.2. This should read as follows: 'Cattle handling should be minimised during **high temperatures or high humidity.**' (not 'extremely hot weather'). *Note: the standard of reference here should be attention to conditions to which cattle are not adapted).*
- G3.6: This should be a standard (S3.8) and should read as follows: 'Appropriate veterinary advice on cattle disease diagnosis, prevention or treatment **must** (not 'should') be sought as required.'
- G3.7: This should be a standard (S3.9) and should read as follows: 'Cattle **must** (not 'should') be vaccinated to protect against likely infectious diseases if there is a significant risk to the welfare of cattle.' *Note: this relates to market access and biosecurity.*
- G3.8: This should be a standard (S3.10) and should read as follows: 'Treatments and vaccines **must** (not 'should') be administered in accordance with directions. Records of treatment **must** (not 'should') be kept.' *Note: this relates to biosecurity and AgVet chemicals.*

- G3.9: This should be a standard (S3.11) and should read as follows: ‘Consideration **must** (not ‘should’) be given to selecting cattle that are suitable for and adapted to the production environment, and that are resistant to parasites and specific diseases relevant to the environment.’ *Note: this would be difficult to audit and enforce effectively.*
- G3.10: This should be a standard (S3.12) and should read as follows: ‘Internal and external parasites **must** (not ‘should’) be monitored and controlled.’
- G3.11: This should be a standard (S3.13) and should read as follows: ‘Downer cattle **must** (not ‘should’) be assessed and treated **appropriately** without delay. **Veterinary advice must be sought for animals that are non-responsive to treatment after 2 days.**’

4) Facilities and equipment

- G4.1: This should be a standard (S4.2) and should read as follows: ‘Facility construction or modification **must** (not ‘should’) take into account:
 - Cattle behaviour
 - **Risk of injury**
 - Topography (location and drainage)
 - Flood and fire risk
 - Climate
 - Purpose/length of confinement
 - Space
 - Feed and water space requirements
 - Shade/shelter
 - Surface materials
 - Cleaning and waste disposal
- G4.3: This should be a standard (S4.3) and should read as follows: ‘The surfaces of yards, pens, tracks and laneways **must** (not ‘should’) be constructed and maintained to minimise the risk of lameness, slips and falls.’
- G4.6: This should be a standard (S4.4) and should read as follows: ‘Faeces and urine accumulations **must** (not ‘should’) be removed regularly.’
- G4.7: This should be a standard (S4.5) and should read as follows: ‘Housed systems **must** (not ‘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.’
- G4.9: This should be a standard (S4.6) and should read as follows: ‘Cattle **must** (not ‘should’) have the opportunity for appropriate exercise each day.’
- G4.10: The first sentence should be a standard (S4.7) and should read as follows: ‘Air **must** (not ‘should’) be of acceptable quality with respect to dust, chemicals and smells. **Ammonia levels must be maintained below 25 ppm.**’ The second sentence to remain as a guideline: ‘Continuous periods of detectable smoke should be avoided.’
- G4.11: This should be a standard (S4.8) and should read as follows: ‘Concrete flooring in rest areas **must** (not ‘should’) be covered by an appropriate depth of bedding material.’

5) Handling and management

- S5.1: 'A person must handle cattle in a reasonable manner and must not:
 - Lift off the ground by only the head, ears, horns, neck or tail unless in an emergency; or
 - Drop, except to land and stand on its feet **after a drop of less than 1 metre**; or
 - **Strike** (not 'strike in an unreasonable manner'), punch or kick; or
 - Drag cattle that are not standing, except in an emergency, for the minimum distance to allow safe handling, lifting, treatment, or humane killing; or
 - Deliberately **or wrecklessly** dislocate or break the tail of cattle; or
 - Use metal pellets to wound as an aide for mustering.

- S5.3: '**Electric prodders must never be used when handling cattle.**' (not 'A person must consider the welfare of cattle when using an electric prodder ...'). *Note: the presence of electric prodders in yards makes it too easy for them to be misused and enforcement of guidelines is problematic.*

- 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 **and are provided with appropriate feed and water requirements.**'

- S5.7: 'A person must only use electro-immobilisation on cattle if:
 - 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 **and competent** 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; **and**
 - 5) **Pain relief is provided as appropriate for the procedure.**

- G5.1: This should be a standard (S5.11) and should read as follows: 'Cattle **must** (not 'should') be handled quietly and calmly, taking into account their flight zone and natural herding instinct to minimise stress during handling. Allowances **must** (not 'should') be made for cattle with special needs such as young calves, lame cattle and bulls.'

- G5.2: Renumber as G5.1.

- G5.3: This should be a standard (S5.12) and should read as follows: 'Under paddock or extensive systems, the frequency of inspection **must** (not 'should') take into consideration:
 - Feed availability
 - Water supply
 - Age
 - Class
 - Pregnancy status
 - Weather
 - Disease risk
 - Predator risk
 - Recent management procedures
 - **Potential for adverse weather or other emergency**

- G5.4: Renumber as G5.2.
- G5.5: This should be a standard (S5.13) and should read as follows: 'Handling aids such as drafting canes, flappers, flags, rattles or other noise makers **must** (not 'should') be used in preference to other strike objects to move cattle.'
- G5.6: Renumber as G5.3. This should read as follows: 'Use of dogs (not 'and electric prodders') should be limited to the minimum necessary'.
- G5.7: This should be a standard (S5.14) and should read as follows: 'Cattle being moved **must** (not 'should') be rested or allowed to slow if they show signs of exhaustion.'
- G5.8: This should be a standard (S5.15) and should read as follows: 'Calves less than 30 days old **must** (not 'should') be handled with care because they may not have developed following behaviours, and may also become easily fatigued.'
- G5.9: Renumber as G5.4.
- G5.10: This should be a standard (S5.16) and should read as follows: 'Wounds **must** (not 'should') be treated as soon as practicable to prevent infection and flystrike.'
- G5.11: This should be a standard (S5.17) and should read as follows: 'Cattle **must** (not 'should') be closely supervised when dipping to prevent drowning.'
- G5.12: This should be a standard (S5.18) and should read as follows: 'Care **must** (not 'should') be taken when drenching cattle to avoid inhalation of the drench or bolus, and damage to the mouth and throat.'
- G5.13: This should be a standard (S5.19) and should read as follows: 'Hoof paring **must** (not 'should') be limited to avoid damage to soft tissue **and must be performed by a competent person.**'
- G5.14: This should be a standard (S5.20) and should read as follows: 'Permanent tethering **must** (not 'should') be avoided.'
- G5.15: Renumber as G5.5.
- G5.16: Renumber as G5.6.
- G5.17: Renumber as G5.7.
- G5.18: Renumber as G5.8.
- G5.19: Renumber as G5.9.
- G5.20: Renumber as G5.10.
- G5.21: This should be a standard (S5.21) and should read as follows: 'The lowest setting of current for electro-immobilisation that produces restraint **must** (not 'should') be selected.'
- G5.22: This should be a standard (S5.22) and should read as follows: 'Operators using electro-immobilisation **must** (not 'should') undertake formal training and assessment to a high level of competency.'
- G5.23: Renumber as G5.11.
- G5.24: This should be a standard (S5.23) and should read as follows: 'Hot-iron branding of cattle (not 'wet cattle') **must** (not 'should') be avoided. **Cattle must be identified by freeze branding.**'
- G5.25: This guideline is redundant following our proposed S5.23.
- G5.26: This guideline is redundant following our proposed S5.23.
- G5.27: This guideline is redundant following our proposed S5.3 and S5.23.
- G5.28 and G5.29: These should both be combined as a standard (S5.24) and should read as follows: 'Ear tagging and tattooing **must** (not 'should') be done in a way that minimises the risk of infection and tearing of the ear. Ear marking and tattooing

instruments **must** (not 'should') be sharp and clean, with relevant hygienic techniques followed.'

6) Castration, dehorning and spaying

Preface: Sentient does not condone the use of invasive procedures such as castration, dehorning or spaying unless they are performed by a qualified veterinarian using the best available anaesthesia (such as nerve blocks) and post-operative analgesia. Whilst such practices persist, we advocate for at least the following improved conditions for affected cattle:

- S6.2: 'A person in charge must **always** use pain relief when castrating cattle.' (not 'unless cattle are less than six months old, or 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. **All cattle (including calves less than two weeks of age) must be castrated by the cutting method. Rubber-ring and tension-band methods must not be used.**' *Note: Calves castrated with rubber rings develop purulent inflammation, significantly more abnormal posturing and greater overall reduction in food intake and daily gain.*
- S6.4: 'A person in charge must **always** use pain relief when dehorning **cattle.**' (not 'unless cattle are less than six months old, or 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; **and**
 - 5) **Appropriate pain relief is provided under veterinary guidance.**
- S6.7: 'A person spaying a cow must be a veterinarian.' (not 'or, if permitted in the jurisdiction, be accredited or be under the direct supervision of a veterinarian or a person who is accredited').
- S6.8: 'A person in charge must use **appropriate** pain relief **and anaesthesia** when (not 'performing the flank approach for') spaying or webbing of cattle. **The dropped ovary technique must only be practiced when heavy sedation and effective analgesia are used.'**
- G6.1: This should be a standard (S6.9) and should read as follows: '**Alternative management systems must be sought in preference to surgical procedures.** Surgical procedures **must** (not 'should') only be done if there are no alternatives and the procedure results in either:
 - Life-time benefits to cattle welfare; or
 - Better herd management, **where no other alternatives exist.**
 - A reduced work health and safety risk, **where no other alternatives exist.'**
- G6.2: This should be a standard (S6.10) and should read as follows: 'Surgical procedures **must always** (not 'should') be done with pain relief. Operators **must** (not

- ‘should’) seek **veterinary** advice on current **and effective** pain minimisation strategies.’
- G6.3: This should be a standard (S6.11) and should read as follows: ‘Surgical procedures **must** (not ‘should’) be planned with consideration to the health and age of cattle, weather, staff availability and facilities, including the use of permanent or temporary yards.’
 - G6.4: This should be a standard (S6.12) and should read as follows: ‘Good hygiene practices **must** (not ‘should’) be implemented in relation to facilities, hands, handling and instruments. **Appropriate** disinfectant **must** (not ‘should’) be used and changed frequently.’
 - G6.5: This should be a standard (S6.13) and should read as follows: ‘Effective but not excessive restraint, **including use of veterinary-approved drugs or drugs used under veterinary supervision, must** (not ‘should’) be used to minimise movement, and to enable the procedure to be quickly and efficiently.’
 - G6.6: This should be a standard (S6.14) and should read as follows: ‘Equipment for restraining cattle **must** (not ‘should’) only be used:
 - For the minimum time necessary and with the minimum restraint necessary, when it is suitable; **and**
 - If it is in good working order.’ *Note: This has important occupational health and safety implications.*
 - G6.7: This should be a standard (S6.15) and should read as follows: ‘Calves **must** (not ‘should’) be separated from their mothers for the shortest possible time unless they are to be hand-reared or weaned onto a solid diet.’
 - G6.8: This should be a standard (S6.16) and should read as follows: ‘Bleeding from surgical wounds **must** (not ‘should’) be minimised by selecting an appropriate method, preventing overheating of calves and allowing them to settle after mustering.’
 - G6.9: This should be a standard (S6.17) and should read as follows: ‘Infection **must** (not ‘should’) be minimised by avoiding muddy or dusty yards, and wet weather.’
 - G6.10: Renumber as G6.1.
 - G6.11: This should be a standard (S6.18) and should read as follows: ‘Cattle **must** (not ‘should’) be inspected daily and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken.’
 - G6.12: Renumber as G6.2.
 - G6.13: This should be a standard (S6.19) and should read as follows: ‘Calves **must** (not ‘should’) be more than 24 hours old when castrated.’
 - G6.14 – G6.16: These guidelines are redundant following suggested changes to S6.3.
 - G6.17: This should be part of S6.3 and should read as follows: ‘The incision for surgical castration **must** (not ‘should’) be of sufficient size, and extend to the base of the scrotum, to allow effective drainage and reduce the risk of infection.’
 - G6.18: This should be a standard (S6.20) and should read as follows: ‘Preference **must** (not ‘should’) be given for breeding of naturally polled cattle.’
 - G6.19: This should be a standard (S6.21) and should read as follows: ‘Disbudding **must** (not ‘should’) be done in preference to dehorning.’
 - G6.20: This should be part of S6.6 and should read as follows: ‘Hot-iron cautery **must** (not ‘should’) be used in preference to excision methods for disbudding calves **and must be used with appropriate pain relief.**’

- G6.21: Renumber as G6.3.
- G6.22: Renumber as G6.4.
- G6.23: This should be a standard (S6.22) and should read as follows: ‘Tipping **must** (not ‘should’) only remove a solid, non-vascular portion of the horn, and result in a blunt horn end.’
- G6.24: This should be a standard (S6.23) and should read as follows: ‘Horn regrowth or a scur that has a blunt horn end **must** (not ‘should’) not be dehorned or tipped.’
- G6.25: Renumber as G6.5.

7) Breeding management

- S7.1: ‘A person performing artificial breeding procedures on cattle must take reasonable actions to minimise pain, distress or injury.’ *Note: Need to define ‘reasonable’ so that economic considerations are not a viable part of the equation.*
- S7.3: ‘A person in charge must ensure calving induction is done **by a veterinarian** (not ‘under veterinary advice’), **only for veterinary medical reasons and not as a herd management strategy.**’
- G7.1: This should be a standard (S7.4) and should read as follows: ‘Technicians responsible for breeding management **must** (not ‘should’) have an understanding of the reproduction and behaviour of both the cow and the bull.’
- G7.2: Renumber as G7.1. ‘In the last 4-6 weeks of pregnancy, management practices should minimise stress on cows and reduce metabolic diseases. **This includes avoiding transportation.**’
- G7.3: Renumber as G7.2.
- G7.4: This should be a standard (S7.5) and should read as follows: ‘Care **must** (not ‘should’) be taken to minimise calving difficulties by adopting suitable management practices ...’
- G7.5: This should be a standard (S7.6) and should read as follows: ‘Cows that receive severe injuries during calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) **must** (not ‘should’) receive urgent treatment, or be humanely killed without delay.’
- G7.6: This should be a standard (S7.7) and should read as follows: ‘Weak or orphaned calves with very little chance of survival **must** (not ‘should’) be humanely killed.’
- G7.7: Renumber as G7.3.
- G7.8: This should be a standard (S7.8) and should read as follows: ‘Herd management strategies **must** (not ‘should’) be adopted to minimise or eliminate the need to induce calving.’
- G7.9: This should be a standard (linked to S7.3) and should read as follows: ‘Cows subject to an induction program **must** (not ‘should’) be inspected twice daily. Any cow requiring calving assistance or treatment **must** (not ‘should’) receive this intervention at the first opportunity, **under veterinary supervision.**’
- G7.10: This should be a standard (linked to S7.3) and should read as follows: ‘Calving induction **must** (not ‘should’) only be done when necessary for the welfare of the individual cow or calf.’
- G7.11: This should be a standard (S7.9) and should read as follows: ‘Bulls **must** (not ‘should’) be checked at regular intervals **where reasonably practicable** for injuries and disease.’

- G7.12: Renumber as G7.4.

8) Calf-rearing systems

Preface: Sentient does not condone calf-rearing systems. Whilst such practices persist, we advocate for at least the following improved conditions for affected calves:

- G8.1: This should be a standard (S8.5) and should read as follows: 'Calves removed from cows **must** (not 'should') receive adequate colostrum within 12 hours of birth, with the first administration occurring as soon as possible.'
- G8.2: Renumber as G8.1. 'The quality of colostrum should be checked' (not 'if in doubt').
- G8.3: This should be a standard (S8.6) and should read as follows: 'If artificial feeding of new-born calves is required, the calves **must** (not 'should') be supervised until they are successfully trained to self-feed.'
- G8.4: This should be a standard (S8.7) and should read as follows: 'Where a cow is being restrained to suckle or adopt an orphaned calf, the cow **must** (not 'should') be observed to ensure that the cow is not becoming distressed and that the calf is suckling.'
- G8.5: Renumber as G8.2.
- G8.6: This should be a standard (S8.8) and should read as follows: 'Calves housed in single pens **must** (not 'should') be able to see neighbouring calves.'
- G8.7: This should be a standard (S8.9) and should read as follows: 'Calves **must** (not 'should') be kept in the company of other calves from three weeks of age.'
- G8.8: Renumber as G8.3.
- G8.9: This should be a standard (S8.10) and should read as follows: 'Solid feeds **must** (not 'should') be gradually introduced. Roughage **must** (not 'should') be provided to encourage the development of the rumen function from three weeks of age.'
- G8.10: This should be a standard (S8.11) and should read as follows: 'Feeding equipment **must** (not 'should') be hygienically maintained.'
- G8.11: This should be a standard (S8.12) and should read as follows: 'Calves that become sick **must** (not 'should') be segregated and **appropriately** treated immediately. **Veterinary advice must be sought when animals are non-responsive to treatment after three days.**'
- G8.12: This should be a standard (S8.13) and should read as follows: 'Floor area of 1.5-2.0m² **must** (not 'should') be provided for each calf in group pens to permit self-grooming and prevent overcrowding. An area of 2.0m² **must** (not 'should') be provided for calves in individual pens.'
- G8.13: This should be a standard (S8.14) and should read as follows: 'Calves **must** (not 'should') be raised in an environment that is:
 - **Free of faecal and urine contamination** (not 'clean')
 - Dry
 - Well drained
 - Provided with sufficient bedding
 - Draught free and well ventilated
 - Free of projections that may cause injury
 - **Managed to minimise pathogen load**

- G8.14: Renumber as G8.4.
- G8.15: This should be a standard (S8.15) and should read as follows: 'Very early weaning of calves **must be avoided and where performed, must** (not 'should') be supported by a high protein diet.'

9) Dairy management

- S9.3: 'A person must tail-dock cattle only on veterinary advice and only to treat injury or disease. **The procedure must only be performed by a veterinarian, using appropriate analgesia and anaesthesia.**'
- G9.2: This should be a standard (S9.5) and should read as follows: 'The milking technique **must** (not 'should') minimise the risk of discomfort, injury and disease.'
- G9.3: This should be a standard (S9.6) and should read as follows: 'A lameness management strategy **must** (not 'should') be implemented and **must** (not 'should') include practices for prevention, early detection and effective treatment.'
- G9.4: This should be a standard (S9.7) and should read as follows: 'Lameness assessment and/or hoof inspections **must** (not 'should') be conducted regularly **by a competent person** and hoof trimming carried out when necessary.'
- G9.5: This should be a standard (S9.8) and should read as follows: 'A mastitis management strategy **must** (not 'should') be implemented and **must** (not 'should') include practices for prevention, early detection and effective treatment.'
- G9.6: This should be a standard (S9.9) and should read as follows: 'During hot weather, access to drinking water **and shade must** (not 'should') be available at all times.'
- G9.7: Renumber as G9.2.
- G9.8: Renumber as G9.3. 'Extra teats should be hygienically removed as soon as they can be identified (not 'expertly and' hygienically removed), **by a competent person and with the provision of appropriate analgesia and anaesthesia.**'
- G9.9: Renumber as G9.4.

10) Beef feedlots

Preface: Sentient does not condone the intensive housing of cattle and will always promote alternatives. Whilst such practices persist in the Australian community, however, we advocate for at least the following improved conditions for affected cattle:

- S10.3: 'A person in charge must ensure **appropriate and adequate** feed is available daily to cattle in the beef feedlot.'
- 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.'
- G10.1: This should be a standard (S10.11) and should read as follows: 'Feedlots **must** (not 'should') be accredited under a third party, audited quality-assurance system.'
- G10.2: This should be a standard (S10.12) and should read as follows: 'Feedlot operators **must** (not 'should') document aspects of a beef feedlot management plan that is not already required to be documented in the standards, including:

- Frequency of cleaning (feed yards, water troughs, feed troughs, drains, sedimentation and holding ponds)
- Details of the records maintained and practices employed to manage the health of cattle held within the feedlot, including:
 - Receival and induction
 - Monitoring/inspection
 - Disease or injury diagnosis and all treatments of cattle, including the method and records used to ensure the observance of withholding periods and/or export slaughter intervals for any chemicals used
 - Mortality and post mortems
 - Biosecurity/disease risk mitigation measures
- G10.3: This should be a standard (S10.13) and should read as follows: 'All cattle **must** (not 'should') be observed standing and moving **normally** during daily inspections.'
- G10.4: Renumber as G10.1.
- G10.5: This should be a standard (S10.14) and should read as follows: 'Cattle **must** (not 'should') be subjected to **industry/government-approved** programs that improve their capacity to adapt before entering the feedlot.'
- G10.6: This should be a standard (S10.15) and should read as follows: 'New arrivals to a feedlot **must** (not 'should') be closely inspected **by a competent person** for injury and illness.'
- G10.7: Renumber as G10.2.
- G10.8: This should be a standard (S10.16) and should read as follows: 'Heavily pregnant cattle **must** (not 'should') be transferred to a pen with lower stocking density or to a paddock before calving. **Every effort must be made to ensure that pregnant cattle are not admitted to feedlots.**'
- G10.9: This should be a standard (S10.17) and should read as follows: 'Calves born in feed yards **must** (not 'should') be segregated with their mothers or humanely killed.'
- G10.10: Renumber as G10.3.
- G10.11: Renumber as G10.4.
- G10.12: This should be a standard (S10.18) and should read as follows: 'Changes in diet **must** (not 'should') be managed to minimise digestive upset to cattle **and such disturbances be attended to under veterinary supervision.**'
- G10.13: Renumber as G10.5.
- G10.14: This should be a standard (S10.19) and should read as follows: 'Water troughs **must** (not 'should') be inspected daily and cleaned regularly.'
- G10.15: Renumber as G10.6.
- G10.16: Renumber as G10.7.
- G10.17: This should be a standard (S10.20) and should read as follows: 'Heat load risk assessments **must** (not 'should') be documented ...'
- G10.18: This should be a standard (S10.21) and should read as follows: 'Feedlot operators **must** (not 'should') develop, document and implement routine management procedures to reduce the excessive heat load risks identified before they occur. These proactive strategies **must** (not 'should') include:
 - **the provision of shade for all cattle at all times**

- G10.19: Renumber as G10.8.

11 Humane killing

- S11.4: 'A person killing cattle must (not 'take reasonable action to') confirm the animal is dead.'
- S11.5: '**A person killing cattle must never do so by delivering a blow to the head.**' (not: 'A person killing a calf by a blow to the forehead must first ensure that the calf is less than 24 hours old'.) *Note: this is consistent with the AVMA (American Veterinary Medical Association) guidelines: S3.2.2.4, Unacceptable Methods – The following methods are unacceptable for euthanasia of cattle and small ruminants: manually applied blunt trauma to the head.*
- G11.3: This should be a standard (S11.6) and should read as follows: 'Three or more signs **must** (not 'should') be observed to determine whether the method used for humane killing has caused death...'
- G11.4: This should be a standard (S11.7) and should read as follows: 'Bleeding out of unconscious cattle **must** (not 'should') be done using a suitable, sharp knife. The thoracic stick method **must** (not 'should') be used. **Bleeding out of cattle without prestunning using the neck cut must only be done as a last resort using a suitable, sharp knife. Exemptions must not be allowed on the grounds of religious slaughter.**'

Submitted on 5th May 2013 by the Executive of Sentient, The Veterinary Institute for Animal Ethics:

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