



## TASMANIAN FARMERS & GRAZIERS ASSOCIATION

Animal Welfare Standards Public Consultation  
Locked Bag 3006  
DEAKIN WEST, ACT 2600

To Whom It May Concern

We appreciate the opportunity to provide comment to the national animal welfare standards and guidelines public consultation for cattle and sheep.

Please find attached our response.

Of course, should further information be required, we would be pleased to assist.

Yours sincerely

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## **ABOUT THE TFGA**

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

More than seventeen thousand people are directly employed in farm related activities. Taking into account basic multiplier factors, this meant the farm dependent economy contributed c\$5.4 billion dollars (18%) to gross state product and 1 in 6 jobs.

With our purpose being to promote the sustainable development of Tasmanian primary industries, the TFGA is committed to ensuring that the agriculture sector in Tasmania is profitable and sustainable. We are committed to promoting the vital contribution the agricultural sector makes to the environmental, social and economic fabric of the Tasmanian community.

Australia's favourable pest and disease status is a vital foundation for the agriculture sector – in both production and marketing terms – and must be maintained through a highly effective and efficient, science-based biosecurity and quarantine regime.

Tasmania is an island state, as a result biosecurity and animal welfare is of paramount importance not just to agriculture but also many other parts of our environmental, social and economic fabric. With so much of our state's base is predicated on environmental assets, tourism and agriculture, we need to be ever vigilant in maintaining our reputation for having some of the highest animal welfare standards in Australia.

## **TFGA POSITION ON ANIMAL WELFARE**

TFGA believes everyone has a moral obligation to treat all animals humanely. It is not acceptable to allow animals to suffer as a result of deliberate ill treatment, neglect or poor management practices. Tasmanian livestock producers take their responsibilities for welfare issues seriously. They are committed to the delivery of good animal welfare outcomes through a national framework approach.

They recognise that production efficiencies are sustainable in terms of economic, environmental and social acceptability. These are dependent on animals that are healthy and well cared for; and that sound husbandry practices are in line with national codes of practice that will deliver good outcomes in terms of both animal welfare, biosecurity and farm businesses.

TFGA believes that farmers have a duty of care to act responsibly and to adhere to animal welfare legislation and relevant industry codes of practice. Farmers also need to ensure that their staff and anyone handling their livestock have the practical knowledge and experience in sound animal husbandry practices.

Every year Australian farmers spend millions of dollars on-farm, ensuring the welfare of their animals. Millions more are also invested in animal welfare research, development and extension.

In Tasmania, legally binding animal welfare standards are those standards which are prescribed in Animal Welfare Regulations created under the *Animal Welfare Act 1993*.

Tasmania's Animal Welfare Standards:

- Are prescribed in the Regulations
- Are legally binding and enforceable
- Non compliance is an offence

- Include nationally agreed livestock welfare standards (to be enforced in all jurisdictions).

The Animal Welfare Act also provides for 'animal welfare guidelines' to be approved under the Act. They are advisory documents for the education and guidance of persons involved in the care and management of animals, promoting the adoption of good standards of husbandry. As official advisory documents they have been used by courts and others to help determine whether a particular action or inaction is a breach of the animal welfare legislation.

Tasmania's Animal Welfare Guidelines:

- Are approved by the Minister under the Animal Welfare Act
- Are developed and reviewed by industry, animal welfare groups and Government
- Include nationally agreed guidelines for livestock welfare
- Set out recommended guidelines for humane treatment of animals
- Advise people with the care or charge of animals
- Advise the courts.

## **TFGA POSITION ON THE SHEEP AND CATTLE STANDARDS AND GUIDELINES**

TFGA welcomes this opportunity to provide feedback from our members on the proposed Australian Animal Welfare Standards and Guidelines for Sheep and Cattle. It advocates for best practice regulation in animal welfare and we encourage and promote to our members the need to apply a high standard of animal welfare.

We understand that the development of these nationally consistent standards and guidelines for sheep and cattle is part of the Australian Animal Welfare Strategy (AAWS). We also understand that these are intended to replace the current Model Code of Practice (MCoP) for the Welfare of sheep and cattle and will be adopted into legislation if they are endorsed by the relevant Ministers.

The TFGA position on the options and variations evaluated in terms of costs and benefits considered are as follows:

TFGA would support Option B of the proposed national standards and guidelines as currently drafted only if the proposed variations to the national standards and guidelines as recommended below are accepted and approved.

For any legislation to be meaningful there must be adequate monitoring and enforcement of compliance. In fact, if there is to be adequate monitoring and enforcement of compliance for the adoption of the national standards, then significant funding will also be required. Rural service delivery agencies and departments responsible for agriculture have seen reduced budgets and staffing numbers since the development of the standards and guidelines begun in 2005.

This means that there will be increasingly limited resources which governments will be prepared to devote to animal welfare activities and the adequate monitoring and enforcement of compliance will be a significant drain on these resources. We are concerned about the feasibility of whether government departments and agencies will be able to implement the monitoring and enforcement of the standards if

adopted in legislation and need indication of how they anticipate implementing the standards. In 2008, Tasmania objected strongly to proposals that would have forced experienced livestock owners, managers and their staff to complete mandatory competency training as a requirement to meet compliance standards. These courses were delivered by trainers who were not familiar with the high welfare procedures practiced in Tasmania as compared to other states and we would not support a return of this requirement.

TFGA strongly support prosecution for animal cruelty and all states currently have strong legislation. The complexity of biological systems means that it is difficult to develop national legislation which anticipates all circumstances that could have adverse outcomes or accounts for regional or environmental differences.

TFGA also recognises and believe it is important that the standards and guidelines for animal welfare outcomes are based on current scientific knowledge and recommended practices appropriate for Australian farming systems and that it considers the benefits and risks of the standards formally separated from the guidelines.

TFGA proposes to the S&G Reference Group that we want the government and others to recognise and demonstrate the extent of industry investment in welfare improvements.

## **SPECIFIC VARIATIONS TO THE CATTLE STANDARDS AND GUIDELINES**

### **Section 5: Handling and Management:**

Objective: - handling and management practices are appropriate and minimise the risk to the welfare of cattle.

Standard:

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

Option C4 would involve replacing proposed Standard 5.5 under Option B (i.e. extending muzzling to all relevant dogs rather than just those prone to bite) - by banning dogs completely.

*TFGA DOES NOT SUPPORT variation C4 and would question whether the standard S5.5 should be a guideline rather than a standard as there is limited welfare benefit.*

*Consideration must be given the welfare of working dogs particularly during adverse weather condition. Some well trained dogs not proned to biting or being muzzled could experience unnecessary stress if there was an automatic requirement to muzzle all dogs. Generally the use of dogs on young dairy calves is not practiced in Tasmania.*

*Well trained dogs are commonly present on dairy and beef cattle farms and the industry is not aware of a significant welfare risk that banning the use of dogs on calves would remedy. This alternative appears to have been derived from an extension of SB4.7 of the Land Transport Standards that apply to calves in trucks, saleyards and processing facilities and it is not relevant to on-farm situations.*

## **Section 6:      Castration, dehorning.**

Objective: - Castration, dehorning and spaying are done only when necessary and in a manner that minimises the risk to the welfare of cattle, particularly pain and distress.

Standard:

- 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.

Variation C5 would entail banning caustic dehorning replacing proposed standard 6.5 under Option B.

*TFGA DOES NOT support variation C5 as it would result in poorer welfare outcomes. It supports standard 6.5.*

As identified in the RIS and in the background information provided for the public consultation, scientists have demonstrated that caustic disbudding causes less pain than other disbudding/dehorning procedures. Other welfare risks from the use of caustic paste are associated with potential transfer of the caustic paste to other sensitive tissues that can be readily managed by the provisions of standard S6.5.

The dairy industry policy encourages farmers to minimise the pain associated with horn removal by disbudding calves rather than surgical dehorning of older animals. Caustic disbudding has significant benefits because it requires minimal restraint to apply, it does not require specialised equipment and it is undertaken on younger calves less than 14 days old. This makes it ideal to perform on dairy farms where it is not feasible to engage a professional contractor. A recent survey of dairy farmers indicated a high level of interest (40% of respondents) in using caustic paste for disbudding.

## **Section 7:      Breeding Management**

Objective: - Breeding and management practices are appropriate to minimise the risk to the welfare of cattle.

Standards:

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

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

Variation C6 would be a variation of the proposed national standards that would have an additional standard, banning induction of early calving except for veterinary requirements.

*TFGA DOES NOT support the proposed variation of an addition standard banning induction of early calving except for veterinary requirements. The industry fully supports S7.3 and S7.4 and does not support Option C6 as it is not proportionate to the animal welfare risks and it would impose unreasonable economic consequences for a large number of dairy enterprises.*

*The Australian dairy industry supports implementation of agreed management strategies to achieve a reduction in the requirement for calving induction. It has recommended that all farmers adopt management options to minimise the use of calving induction.*

*The dairy industry has a high priority and active research and extension program towards improving reproductive performance and research is being conducted to identify alternative management strategies to reduce the need for calving induction in seasonal calving herds as part of the National Dairy Industry Animal Welfare Strategy.*

*Calving induction is a treatment to assist reproductive performance of the dairy herd particularly in seasonal calving dairy herds to align calving and peak nutritional requirements with maximum pasture availability. Welfare risks associated with calving induction can be managed effectively by the provisions of standard S7.3 that requires veterinary oversight to ensure the procedure is relevant to the reproductive management of the herd. Only suitable cows are selected and induced to minimise any adverse welfare outcome.*

*The annual economic impact of banning calving inductions to the expanding Tasmanian dairy industry is estimated to cost \$856.87/cow with an estimated annual cost to the industry of \$12,853,050. The banning of calf inductions would have a greater impact on Tasmanian dairy herds because it has a higher percentage of seasonal calving herds compared to other states. A seasonal calving pattern allows producers to maximise the health and welfare improvements of their herd as well as to manage production cost efficiencies, particularly given the expense of producing milk over the winter season.*

*Variation C6 does not provide any additional welfare benefit, in fact it would result in a greater percentage of welfare and health related incidences, if it was to be included in the standards. Furthermore, dairy producers will elect to induce calving of cows to ensure that calves are born in line with most of the herd, or to reduce potential welfare implications if it is thought that the size of the calf at full term may cause welfare problems for the cow.*

*The welfare of both the cow and its calf is a high priority, so induction is only performed under veterinary advice on animals that are fit and healthy. Veterinarians follow the Australian Cattle Vet induction policy for all inductions.*

## **Section 9: Dairy Management**

Objective: – Dairy cattle are managed to minimise the risk to their welfare.

Standard:

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

*In accordance with the Tasmanian Dairy Cattle Welfare Guide, TFGA supports standard S9.3. Over the past 10 years there has been a dramatic reduction in the use of tail docking (47% of farms in 2005 and 18% of farms in 2012).*

## SPECIFIC VARIATIONS TO THE SHEEP STANDARDS AND GUIDELINES

TFGA supports the proposed Animal Welfare Standards and Guidelines for Sheep (Option B in the Regulatory Impact Statement) as they are drafted, only with the proposed variations to the recommendations, as the basis for developing and implementing consistent legislation and enforcement across Australia.

### Section 7: Mulsing

Objective: - In circumstances where mulsing is necessary for the long term welfare of the sheep, it is done in a manner that minimises the impact of the procedure.

Standards:

- S7.1 A person performing mulsing 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.
- S7.2 A person must not mules sheep that are less than 24 hours old or more than 12 months old.
- S7.3 A person must not mules sheep that are 6-12 months old without using pain relief.
- S7.4 A person must not mules sheep showing signs of debilitating disease, weakness or ill-thrift.
- S7.5 A person mulesing sheep must only remove wool-bearing skin.

Variation C1 would be a variation of the proposed national standards that would amend proposed standard S7.3 and would require pain relief for *all mulesing* and not just for sheep that are six months to 12 months of age.

*TFGA DOES NOT support the mandatory requirement for pain relief for all mulesing. It supports the standard S7.3. However, in Tasmania the use of pain relief at the time of mulsing to protect the welfare of the lambs is strongly supported and advocated.*

*It must be noted that the application of Tri-solfen is the only registered pain relief treatment available and there are no registered pain relief treatments for pre-mulsing applications. Mulding in Tasmanian is practiced by some owners and managers to protect the welfare of Merino sheep particularly against the incursion of fly strike.*

### Section 8: Breeding Management

Objective: - Breeding management practices are appropriate and minimise the risk to the welfare of sheep.

Standard:

- S8.2 A person must be a veterinarian, or operating under veterinary supervision to perform surgical embryo transfer and laparoscopic insemination of sheep.

*TFGA DOES NOT support standard S8.2. Laparoscopic insemination of sheep is a highly specialised activity which is performed by four highly skilled and experienced technicians in surgery who have been certified by the Australian Veterinary Association to complete this work although they do not have veterinary qualifications.*

*While TFGA supports training requirements for this procedure, it is impractical and unnecessary to restrict this to veterinarians alone. Instead the performance of surgical embryo transfer and laparoscopic insemination of sheep should be restricted to appropriately trained technicians and veterinarians.*

*If this standard was to be enforced, the negative implications to the welfare of sheep could be significant as few practicing vets are familiar with this surgical application and do not have the frequent experience and hygiene standards required to complete approximately 300 surgeries per day. The four certified technicians to date have completed over 350,000 inseminations with only 23 ewes incurring problems. This greatly exceeds vet statistics for cat and dog morbidity and mortality.*

*Surgical Embryo transfer should be the responsibility of a veterinary that has the necessary skills and frequent experience needed to perform this surgery efficiently. It is well recognised that only a very small percentage of suitably qualified and experienced vets become involved in this highly specialised activity. For example there is only one vet from NSW who performs all surgical embryo transfer work in Tasmania.*

*TFGA proposes that highly skilled certified technicians that have been given an exemption by the AVA must be permitted to perform laparoscopic insemination of sheep. This must not be restricted to vets who are not familiar with this surgical practice.*

**In Summary:**

TFGA act as the custodians of animal welfare and farmers have immense concern for their livestock and other animals and we thank you for the opportunity to comment on this public consultation.

It must be remembered that the aim of the primary producer who keeps sheep and cattle is to ensure that the animal's welfare is of the highest standard. We would like to see that SCoPI agrees to a uniform implementation timetable and application of the standards and guidelines.