The Western Australian Farmers' Federation Inc.

Meat Council

Submission to the

Australian Animal Welfare Standards and Guidelines 'Cattle'

Standing Council of Primary Industries

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Submitted to:
Animal Welfare Standards Public Consultation
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Thank you for the opportunity to comment on the Animal Welfare Standards and Guidelines – Cattle. WAFarmers is the State's largest and most influential rural lobby and service organisation. WAFarmers represents approximately 4,000 Western Australian farmers from a range of primary industries.

Animal welfare a priority for the organisation and WAFarmers supports initiatives for animal welfare improvement. Similarly WAFarmers values its member's ability to conduct viable sustainable business. WAFarmers recognises that good animal welfare practice results in a better product and stronger returns, hence, WAFarmers have considered both these aspects when making our submission.

WAFarmers supports

a. the *Guidelines* remain voluntary and *any* movement of the *Guidelines* into a *Standard* be done via consultation with industry;

b. new laws are practical and impose no additional financial burden on producers who are operating in a manner compliant with sound, scientifically justified animal-welfare practices;

c. jurisdictions are committed to providing adequate resources to support their insistence that producers be compliant with new laws.

d. there are some concerns with the practicality and feasibility of implementation in pastoral areas.

General comments RIS:

1.   Requiring pain relief for all spaying (C1) will remove the capacity for lay spayers to conduct the Dropped Ovary Technique (because lay spayers will be unlikely to access pain-relief drugs). Cattle Council of Australia has sponsored the creation of a Unit of Competency for lay spayers to allow their continued operation under the new Standards.

2.   Banning flank spaying (C2) will prevent essential spaying of female animals for which only flank spaying is available. Vets will continue to be required for such spaying, which is supported by WAFarmers.

4.   Banning electro-immobilisers (C7) in jurisdictions where use is currently permitted will remove an important, albeit seldom-used, tool for handling animals that might otherwise endanger themselves or the operator. Nevertheless, it is important for operators to be instructed on proper use.

Specific Issues:

Standards and Guidelines

S6.2 & S6.4 'Mandatory Pain Relief'

• Lay operators have limited or no access to appropriate pain-relief compounds.

• Requiring lay operators to use pain relief when it is not readily available effectively bans the procedure.

• Having vets perform all the functions listed under these *Standards* is totally impractical and unaffordable.

Therefore, no prosecutions should be considered under this *Standard* until such time as pain-relief compounds are readily available to lay operators at an affordable rate.

S6.8 'Flank Spaying'

• This is recognised as an operation best performed by veterinarians.

Therefore, the pain-relief requirement is acceptable in the case of flank spaying.

G6.14 & G6.15 'Castration'

• While current science appears to support the age guidelines provided here for the use of rubber-ring (less than 2wks old) and cutting (more than 2wks old) methods, these *Guidelines* appear unnecessarily prescriptive.

In numerous Standards, the words "reasonable" and "unreasonable" are used.

• It is difficult to define "reasonable" and "unreasonable", but a fair attempt has been made on p. 6-7 under Interpretation.

Therefore, consider rewording (if necessary) the interpretation of "reasonable" and "unreasonable" into a definition and moving it to the Glossary.