



WORLD SOCIETY FOR THE PROTECTION OF ANIMALS

SUBMISSION

DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY

Cattle draft standards and guidelines

Public Consultation

May 2013

**World Society for Protection of Animals (WSPA) Submission
Cattle draft standards and guidelines
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Introduction

WSPA (World Society for the Protection of Animals) has been protecting animals around the world for over 30 years. WSPA is working to make this happen and to create a world where animals matter and animal cruelty has ended.

We move the world to protect animals and we believe our work with animals starts with people. To change animals' lives we work to move people to change their attitudes, their behaviours and their actions. This can start with those people who are responsible for the care of cattle in Australia.

WSPA welcomes the opportunity to submit comments on the draft Cattle Standards and Guidelines. Please do not hesitate to contact me, should you seek further clarification on any matter enclosed.

General comments:

According to the discussion papers accessible, the apparent framework for shaping a standard relates to the following:

- Desirable for cattle welfare
- Feasible for the majority of industry to implement
- Feasible for government to implement
- Important for the cattle regulatory framework (relevant to existing Model COP and state legislation)
- Valid Outcomes (outcome oriented)

There is no further information provided on the determinants for verification, or the criteria or process followed to enlighten the reader as to why a certain item has become a standard and another a guideline. Standards are mentioned in terms of being 'verifiable' but not measurable, which appears increasingly at odds with industries needing to measure and assure their markets and the public of good animal welfare. The regulatory implications of an Australian standard under respective State jurisdictions and their current legislation is also unclear. However we understand the adoption of the final standards, or not, is ultimately at the decision of each jurisdiction. The proposed Australian standards are apparently written to *fit with existing legislation* rather than aspire to advance and make consistent revision of State legislation. Guidelines remain understood as essentially unenforceable, providing at best educational qualification of a standard and at worst a potential defence of cruelty, if they cannot be *reasonably* achieved.

WSPA asserts that the Australian standards must at least provide equivalent if not better protection than ESCAS (Export Supply Chain Assurance System) and OIE standards for beef

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cattle. WSPA has aimed to highlight where anomalies exist, though considers OIE standards to be an absolute minimum and that the Australian Standards must aspire to be higher than these (OIE) minimum standards for cattle welfare.

WSPA understands it is up to the interpretation of the court of law in respective State Jurisdictions to determine what is considered *reasonable* and what is considered *unnecessary* suffering and cruelty of animals, or a failure to provide for their good welfare. These terms have no place in the writing of standards that could be incorporated into future State Law or Regulations. Regulatory standards that can be definitively measured must clearly determine minimal requirements based on available science and ethical expectations of the Australian public. Greater transparency, established criteria and systematic review of key requirements as standards would enhance the public trust and determination of Australian cattle standards. Furthermore, there are essential aspects of animal welfare that remain elusive in the draft standards, most notably the actual requirements of adequate daily food and water and shade. These items can be clearly measured as a standard as 'present or not' and furthermore in adequate amounts, suitability, quality and access. WSPA strongly suggests that the basic requirements for cattle must be provided in clear, measureable standards in Australia and refers to its over-arching Policy document (2004) in relation to the following section on farm animals:

'Farmed animals must be provided with shelter, exercise, food, water and care in a manner appropriate to their physiological needs. WSPA is opposed to any methods of husbandry which do not fulfill these criteria.'

'WSPA is in principle opposed to mutilations which are carried out for non-therapeutic reasons, especially those carried out in an attempt to 'adapt' animals to an inappropriate husbandry system.'

Furthermore, various states have existing requirements with which the Australian Standards must not conflict. For example in Victoria under POCTA 1986 legislation, the public is advised about their responsibilities¹ for livestock:

*"The basic needs of animals – adequate food, water, air, shelter, treatment, comfort and the freedom to move and express normal behaviour patterns – **must** be met."*

Specific comments by item:

1. Responsibilities

¹ <http://www.dpi.vic.gov.au/agriculture/about-agriculture/legislation-regulation/legal-information/livestock-management-legal> accessed 2.5.2013

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S1.1 Actions to ensure the welfare of cattle under their care – does not qualify in any way the welfare state of an animal. Welfare is a continuum. Responsibility can be transferable. Ultimately, the person in charge must be accountable for the welfare state of the cattle. Suggested rewording: ‘a person must ensure **good** welfare of **all** cattle under their care’.

2. Food and Water

S2.1 A simpler statement that requires daily provision is suggested – ‘a person in charge must ensure that all cattle have **daily** access to adequate and appropriate feed and water’.

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

The standards currently do not, **but must**, provide the requirement for daily access to shade or shelter for cattle. This is a basic requirement for good welfare and to prevent many of the risks of extreme weather, calf losses and may predispose animals to disease or death if not provided (snap cold, calf hypothermia, heat stress, immune-compromise and general stress as a component of disease risk etc). Shade/shelter is often poorly provided in Australia, with many paddocks, yards and feedlots without shade provision at all. This is unacceptable and the Australian Government has a responsibility to not only encourage, but require shade and shelter provision in the varied and often harsh climates of Australia. WSPA notes there are also current schemes for carbon sequestration, land care and others supporting the planting of trees or vegetation belts that could have a dual purpose to provide shade/shelter and risk reduction of extremes of weather and natural disaster. This also relates to comments on section 8 for dairy management and section 10 for beef feedlots and shade requirement.

WSPA strongly requests that a standard requiring daily access to shade or shelter be inserted in section 3.

S3.2 and 3.3 are vague and potentially hard to verify. ‘First reasonable opportunity’ to provide treatment may be days, weeks or months away for extensive production systems or hobby farm initiatives. Guideline 3.11 - should be a standard and suggested as – ‘*Inspection of cattle must include checking their movement. Non-ambulatory or downer cattle should be assessed and treated immediately*’. This is already integrated into existing ESCAS standards for cattle, so should be included here for consistency and the avoidance of doubt. While, it is understood that extensive systems in Australia are more challenging to manage, downer or non-ambulatory animals can often be seen by air and their suffering can be ended by euthanasia if treatment is not feasible. **Regardless, the challenges of extensive systems should not dictate standards and preclude improved welfare of cattle in non-extensive systems.**

There should be a standard to require that cattle are inspected daily in non-extensive systems to prevent compounded injury, disease spread, predation and effects of extreme weather and natural disasters on the animals. A requirement for the person in charge of extensive systems to monitor cattle immediately or as soon as possible after natural disasters should also be included and is usually feasible as they survey for rain, damage or stock locations generally. Calf losses

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are also very high in these systems due to lack of regular animal monitoring. Monitoring or inspecting cattle more regularly could also assist in alerting the Government to disease outbreaks and the need for disaster response. There could also be other requirements, for example those relating to biosecurity legislation and the investigation of sudden or group death of animals, which could thus require regular animal monitoring to be elevated to a standard.

4. Facilities and equipment

S4.1 is suggested as 'a person in charge must ensure construction, maintenance and operation of facilities and equipment provide for good welfare of cattle'. That welfare requirement can be further qualified and quantified to become a standard not a guideline (G4.3), as it is already embodied in ESCAS with targets for slipping of less than 3% and falls less than 1%.

This enables the welfare state of a herd of animals to be objectively assessed and where concerns are linked to facilities or equipment or handling, the person in charge is clearly responsible. Furthermore, it enables problem solving and prevention, which reduces further welfare concern and production related losses or costs.

Housed cattle: social interaction of familiar or suitably grouped cattle is a scientifically established aspect of their positive welfare and stated as a principle of welfare in the draft standards and guidelines document. WSPA believes the following standard to encompass this important animal need is included: **'Cattle must not be penned singly unless for the benefit of their own welfare, or temporarily for management of bulls or research, the latter only with full prior animal ethics approval by the responsible institution'**. Individual housing of dairy cows or calves is also not acceptable unless for the above-stated reasons.

5. Handling

Cattle handling in terms of stockmanship and competence was the primary concern (amongst 13 priority welfare issues of beef cattle) to governments, farmers, land transporters and animal welfare scientists, as surveyed in Australia by Phillips et al, 2009. Animal handling is also of great concern to WSPA, which notes the importance of having clear standards to outline what is acceptable and what is prohibited as inhumane handling. WSPA believes the proposed standards are not acceptable in their current form and would benefit from the suggested improvements below.

It is also far more difficult to verify *'a reasonable manner'* than it is to verify humane handling or not. There is a plethora of scientific literature on cattle behavior and handling to enable its definition as humane or not. There are inhumane handling allowances proposed in the draft standards that **should not be permitted**, especially when there should be means on farm, or via a veterinarian, for humane killing if appropriate as an alternative. For example- **when or how can it ever be justified that an animal can be lifted/hoisted off the ground by only the head, ears, horns, neck or tail or even limbs when conscious?**

This is not acceptable under ESCAS standards and should never be allowed in Australian standards. Furthermore, the ESCAS requirements for handling (*supply chain element 1-*

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handling) of Australian livestock are actually more detailed in some areas. Australian standards should at least align with these as a minimum, in addition to the following suggested requirements.

S5.1: *A person must handle cattle humanely at all times and must not:*

- 1) lift or hoist an animal off the ground by only the head, ears, horns, neck, tail or limbs*
- 2) drop, except to land and stand on its feet after humane movement of the animal*
- 3) strike, punch or kick; or*
- 4) drag cattle, except in an emergency for the minimum distance and for the safety of the animal or handlers if humane killing is not readily available or appropriate*
- 5) twist, dislocate or break the tail of cattle*
- 6) use metal or rubber pellets or similar as an aid for mustering*
- 7) force an animal in a race over another animal or in a situation where the animal has nowhere to go*
- 8) allow slipping of more than 3% and falling of 1% of cattle when being handled, mustered or when in the yards*

S5.2 *A person must not drive cattle to the point of collapse, or attempt to drive an animal that is not fully ambulatory or considered fit and healthy to be driven the distances required.*

A guideline to the effect that mustering speed should ideally be determined by the slowest animal, moving without force or coercion is also recommended (Garson, 2006).

S5.3 *A person must only use an electric prodder if all humane handling aids have failed and then must minimize its use. A person using an electric prodder must not... 1) to 4) and suggest 5) must not use it repeatedly if it has no effect after initial use, especially when an animal is non-ambulatory.*

S5.4 and 5.5 – *no comment*

S5.6 *A person in charge must ensure cattle are accustomed to tethering before they are tethered for more than a period of a few minutes. A person must ensure that tethered cattle are able to exercise daily. Cattle must not be tethered long term or permanently. (This would remove the need for G5.14)*

Tethering for long periods, permanent tethering:

There is adequate science showing that long term or permanent tethering is associated with significant animal health and welfare concerns. Such tethering should not be permitted in Australia, as there are better management and welfare alternatives readily available. This section is understood to also refer to dairy cattle. WSPA is opposed to zero grazing systems for cattle and is aware of the following concerning trends and welfare science.

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The WSPA 'Nocton Welfare'²reports raised several issues with zero grazing dairy systems and further welfare review of tie stalls or tethering systems can be provided on request. Issues of concern with long term or permanent tethering include reduced longevity, increased metabolic and reproductive disorders, mastitis and lameness.

The physical and behavioural constraints of the tether, small area of space and possible proximity of unfamiliar conspecifics contributes to significant frustration, and reduced lying and resting times compared to untethered cattle. Depression is also strongly suspected in long term tethered animals. Stereotypies associated with the lack of movement and grazing, i.e. thwarted locomotor and feeding motivation caused by tethering (and potentially compounded by decreased fibre provision) may be seen as sham-chewing, pacing, swaying and shifting/moving back and forth, which can also be indicative of lameness.

Electro-immobilisation (EI) relevant to S5.7 to 5.10

WSPA is opposed to electro-immobilisation (EI). This technique, which essentially employs an electric current to immobilize an animal provides no anaesthesia or analgesia. When used, EI contributes to the existing pain and stress of painful husbandry procedures, such as spaying, for which it is routinely used (Petherick et al, 2005). EI is imposed by causing tetanic contractions (tetany) which are known by human medicine and science to be painful muscular cramps. It can also reliably induce apnoea, dyspnea, cardiac perturbations and other aversive and stressful states in the animals. Ultimately, the animal cannot escape or perform normal behaviours that would clearly indicate that the EI state and subsequent procedures were painful, stressful or even causing intense suffering. Internationally EI has been surpassed by progressive methods of less stressful restraint and sedative/anaesthetic induction. EI is banned by a number of countries, prohibited by several western veterinary associations, completely denounced by animal protection organisations and there is no reason why it should be allowed to continue in Australia.

Furthermore – known painful procedures such as DOT (dropped ovary technique) for cattle spaying remain available according to this draft document without even the requirement for analgesia let alone local anesthesia. By definition the challenges of extensive cattle production also pose challenges for regulating EI.

The time is now for the Australian Government to lead the way and phase out an outmoded and very stressful method of cattle handling. Otherwise it risks market access concerns raised by the exposure of a technique that is virtually particular to Australia and it's extensive cattle markets.

As an interim requirement, in WSPA's view, EI related guidelines G20 to 25 must be included as standards.

Identification:

Branding is only currently compulsory in 3 states of Australia, but there is no requirement for the

² Nocton Briefing 1- Welfare Issues. WSPA International 2010

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method of branding. Fire or hot iron branding is completely unacceptable to both WSPA and the RSPCA.

It is permitted only with pain relief in New Zealand and has been replaced by more humane methods, such as freeze branding, ear tagging and tattooing in cattle and, in Australia, the mandatory NLIS system for permanent identification. The preference of respondents surveyed by Phillips et al, 2009, for freeze over fire-branding concurs with experiments by Lay et al. (1992) demonstrating a greater increase in heart rate and plasma cortisol for the latter method, consistent with greater stress response in fire-branded animals. If industry stakeholders prefer freeze branding, which is also permanent when done well, then there should be no major resistance to banning hot iron (fire) branding in Australia.

Matthews in 1996 further asserts:

“Identification procedures must be non-injurious and those causing suffering (such as fire-branding) should not be used.”

WSPA asserts that a standard prohibiting fire/hot iron branding is long overdue and must be included. This would remove the need for G24 to 27.

Branding or tattooing of any sort also must not be placed on the udder, which is a sensitive organ. Preferred wording for standards:

S5.9 A person must only use humane methods and techniques to identify cattle that are applicable to the production system.

S5.10 A person must not use fire or hot iron branding and must not place a permanent brand or tattoo on the udder or head of cattle.

G5.10 and 5.11 should be incorporated into standards as basic practical requirements to provide for good welfare:

“Wounds must be treated as soon as practicable including a preventative to prevent or at least reduce the incidence of flystrike’ (Ivermectin injection can assist routinely at the time of wound identification to prevent development of larvae from flystrike during healing).

“Cattle must be closely supervised during dipping to prevent drowning”

G5.3 should also include shade and shelter resources, as well as included them as a standard requirement in section 3.

6. Castration, Dehorning, Spaying

Spaying, dehorning and castration of cattle are amongst the major concerns surveyed by Phillips et al (2009) by various professional sectors in Australia. From vets to government staff, farmers, animal welfare advocates and scientists, spaying and dehorning consistently rated amongst their top concerns, while castration without pain relief was of more concern than the actual method of castration. The cattle castration discussion paper provided various references that found that

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surgical castration was preferred in terms of healing, complications and pain. The standards should thus reflect this scientific knowledge, advocating surgical castration under appropriate conditions and prohibit tension bands at least in bulls/bull calves greater than 6 months. Furthermore, WSPA believes that any surgical practices should only be done by competent technicians (ideally competent veterinarians) and with anesthesia and analgesia. Interim compromise to set a threshold age for requiring anesthesia and analgesia should aim for that which will advance existing legislation humanely, including advocating for the research and development of alternatives (e.g. hormonal, immunocontraceptives, other). Precedents in some species in Europe already exist (e.g. pigs in Netherlands).

The scientific literature on pain nociception and perception, and various analgesic modalities, clearly establishes that the application of analgesia should be provided prior to the pain insult, greatly reducing nociception sensitivity, pain perception and associated behaviours. Thus all standards should incorporate this knowledge, requiring pain relief as analgesia and anesthesia before these procedures known to be painful are initiated (also endorsed by Stafford et al, 2002).

Stafford et al concluded that a combination of lignocaine and ketoprofen was an effective combination for at least 8 hours pain relief for a range of methods of castration (2002), effective short-to-medium term in the context of dehorning (2003), and affordable with surgical castration of calves (in NZ) published in 2005. Schwartzkopf-Genswein et al. (2005) note that physiological and behavioural signs of distress persisted for 24 to 48 hours in Holstein calves and on average for 4 hours after dehorning/disbudding. It must be further noted, the combination analgesia and anesthesia afore-mentioned does not reduce pain to nil as the discussion paper summarily poses.

While the discussion paper raises the concern that most scientific studies have been done in non-industry contexts, these studies aim to isolate the pain measured in both physiological and behavioural indicators without the likely cumulative stress of industry context (novel herding, handling, concurrent multiple procedures, herd throughput etc). The only positive aspect of industry context maybe maternal or herd protection and security, from which a calf would then be removed for the procedure, either temporarily or finally with concurrent weaning. While more research is likely important, existing research does enable some determination of standards for analgesia and anesthesia in addition to recommending the least aversive procedures currently known. The issue of legal access and use of the recommended analgesics and anesthetics is important, but beyond the scope of this submission. However, it is noted that there are systems in New Zealand that enable farmers to legally access otherwise restricted veterinary medicines, under controlled circumstances for the performance of painful husbandry procedures. The following suggestions are posed for the standards:

S6.2 A person must use pain relief (both local anesthetic and analgesia) before castrating cattle.

S6.3 A person must use appropriate tools and methods to castrate cattle. Tension bands must not be used for castrating cattle. (This would convey the need to remove tension bands from G6.15 and G6.16).

Dehorning

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Several welfare assessment studies have been conducted on various methods of dehorning or disbudding. Concerns remain with extended pain and operator and animal risks associated with the use of caustic methods, sufficient to prohibit use of this method. Even if further research is completed, operator variation and risks of caustic chemicals burning an operator or animal in various places do not justify their use when safer alternatives exist. Gregory (2004) believed that the duration of pain inflicted by the hot iron method is shorter than that produced by the scoop method, irrespective of whether or not a local anesthetic is used. He ultimately advocated for the use of a local anesthetic to control pain produced at the time the wound is inflicted. Further studies demonstrate the benefits of concurrent analgesia.

S6.4 A person must use pain relief (anesthesia and analgesia) before dehorning cattle.

S6.5 A person must not use caustic chemicals for dehorning cattle or disbudding calves. (This would convey the need to remove G6.22).

Spaying:

WSPA notes with disappointment that selective quoting and assessment of pain and welfare (and the additional stress of EI restraint) in the cattle discussion paper on spaying is misleading and not to be expected from a Government department. Petherick et al (2005) clearly conclude the following:

“For both heifers and cows, FL and DOT spaying caused similar levels of acute pain, but FL had longer-lasting adverse impacts on welfare. Electro-immobilisation during FL contributed to the pain and stress of the procedure. We conclude that: i) FL and DOT spaying should not be conducted without measures to manage the associated pain and stress; ii) DOT spaying is preferable to FL spaying; iii) spaying heifers is preferable to spaying cows; and iv) electro-immobilisation causes pain and stress and should not be routinely used as a method of restraint.”

Petherick et al (2011) also concludes

“In yearling heifers, WDOT spaying resulted in lower morbidity and short-term mortality compared with flank spaying. Both methods compromised the health and welfare of some animals for up to 4 days and body weight gains were reduced during the 6 weeks post spaying.”

It is reasonable to assume that the morbidity, mortality and production losses are even greater in cows than yearling heifers.

Furthermore the DAFF discussion paper is at times contradictory – noting pain is associated with both flank and DOT methods, yet advocating a standard for analgesia only for the flank technique. Similarly the paper promotes the conduct or supervision of the techniques by a veterinarian, notes there are accredited training courses available, but does not require

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accredited operators to perform the procedure. The paper discusses the extensive conditions of production, but states the need for monitoring post-surgery, which is unlikely to be practicable for days after the technique, let alone time for peritonitis to take effect (suspected as most deaths occurring in Petherick et al, 2011 occurred at 5 or more days post surgery), or full healing of the skin with the flank incision (up to 42 days, 5% with flank technique Petherick et al, 2011). There is no standard for monitoring in the discussion paper (as previously noted) and it is highly doubtful that adequate monitoring and management of complications will be secured by the guideline proposed.

Trained veterinarians or technicians can carefully induce appropriate high epidural or L flank anesthesia for respective practices, and the argument that L flank anaesthesia is not practical for flank spaying was not substantiated and is unacceptable. Local anesthetic techniques are not strongly advocated nor practiced in Australia compared to other countries e.g. America, and the Global Council for Pain for other species. As previously noted, the application of analgesia should be provided *prior* to the pain insult occurring, greatly reducing pain perception and associated behaviours. NSAID analgesia (Ketoprofen registered for use in Cattle in Australia) should be routinely used, and could be administered intravenously by tail vein, prior to these surgical procedures, though significant volumes are required (10 to 15 ml of Ketoprofen 100mg/ml).

The cost-related discussions are the remit of a RIS, but while the expense involved could be compensated for by reduced production and mortality, there is no guarantee if losses are associated with infection or fatal haemorrhage. It is thus suspected that the time and costs required for analgesia and local anesthesia may be perceived as prohibiting their economic use and current inhumane practices will continue unchanged.

WSPA thus recommends that existing but little used alternatives to surgical spaying be advocated e.g. hormonal (GnRH with repeat injections) and that hormonal, chemical or immuno-contraception must be further researched as part of advancing a policy for timely phasing out such techniques and associated electro-immobilization practices. The flank technique should be banned (for both heifers and cows) in these standards, given that the DOT method is generally preferred and because medium-term (>24 hours) pain related behavior detection and the risks of haemorrhage and peritonitis are reportedly greater than with DOT, especially in multiparous cows.

Webbing should also not be supported in these standards or guidelines given the potential for pain and peritonitis and because it does not convey two of the three objectives outlined, specifically excessive mounting behavior and full term pregnancy and potential associated welfare concerns. These cows can be checked and spayed at the next muster. Vaginal spreaders should not be used in either heifers or cows.

At the very minimum, WSPA maintains that neither flank nor DOT surgeries should be performed without prior anesthesia and analgesia conducted by an accredited technician or veterinarian proficient in the relevant techniques. The need for immediate research as to the efficacy of a single injection of NSAID analgesia proposed is also required.

7. Breeding Management

Numerous welfare concerns for both cow and calf are clearly associated with calving induction for production purposes. WSPA opposes the induction of calving where it is not for therapeutic or welfare reasons.

It would appear a contradiction of policy for the Australian Government to set standards encouraging farmers to seek veterinary instruction for calving induction, while the AVA (Australian Veterinary Association) openly opposes calving induction. WSPA supports the encouragement of industry to better manage breeding and allow cows to have healthy calves at term and minimal complications. Furthermore, WSPA supports the production of sexed or cross bred male calves that can contribute to humane meat production, rather than the current extensive wastage of calves in the dairy industry. The UK and NZ governments have taken a decisive lead by discouraging routine induction and here lies an important opportunity for Australia to do the same, while encouraging humane and productive breeding of dairy cattle. WSPA suggests that a single standard to replace S7.3 and remove S7.4 is required:

S7.3: 'Calving induction should not be performed unless for the welfare or therapeutic benefit of the cow or heifer' or 'Calving induction must only be done when necessary for the welfare of the individual cow or calf'. (This removes the need for 7.9 and 7.10).

G7.5 and 7.6 are basic welfare (and also statutory veterinary requirements) in the prevention of suffering and should be elevated to standards.

The Guidelines could be more educational, advising minimal BCS (body condition score) for lactating cows and weaning calves to maximize production and reproduction benefits, while reducing welfare concerns. In addition, any aspects of the Standards that may not align or that conflict with pending sea transport requirements for breeding cattle (or at least the current ESCAS standards) should be considered in the final version of these standards. These may relate to prohibiting any transport of late stage pregnant cows or calves less than a certain age. This is essential to prevent calving of beef or dairy cattle on ship, as has recently occurred with beef cattle exported and calving on ship in 2012.

8. Calf- rearing systems

A clearer and more detailed explanation and definition of current veal production systems in Australia is required, given the potential concerns surrounding S8.3 and S8.2. **Adequate diet and sufficient feeding must be required with no exception for veal production.** Furthermore calves must not be individually housed when we understand the key principles of socialization and its importance to calf welfare, especially given the unnatural system of early weaning and artificial feeding that is currently practiced. Calves not only need visual communication, but also tactile and full social communication for good welfare and behavioural development. The ability of calves to contact others during lying also relates to their ability to maintain adequate temperature in their given environment. Individual housing provides none of these things. And prevention of extremes of temperature is also required, not just response as indicated by G8.14. The standards should specifically include:

“Calves must not be housed individually except to control an existing disease outbreak.”

Similarly, normal behaviour for calves in cages or pens should be greater than required by S8.2: *“...turn around, lie down and fully stretch their limbs”*. This standard affords calves no more welfare protection than caged hens and must be advanced. Space of 1.5 to 2sqm per calf in group or individual pens will not provide adequately for normal exercise and play behaviours, which are essential as part of the socialization and normal behavioral development of calves. Adequate space for the full repertoire of normal (non-injurious) behaviours must be required in all calf rearing systems. Otherwise the industry risks significant public and professional criticism in future.

S8.4 is too vague – perhaps targets or trigger levels for investigating respiratory and gastrointestinal disease incidence could be considered as part of the guidelines to inform outcome oriented control of multifactorial respiratory and gastrointestinal disease.

G8.11 *‘calves that become sick should be segregated and treated immediately’* should be elevated to a standard – to fulfill a crucial element of good husbandry, biosecurity and welfare. Furthermore, there is also no guidance or standards on acceptable calf losses in any situation, which are reportedly much higher in extensive systems due to various reasons, primarily lack of regular monitoring. Some form of guidance should be included to advance awareness of this issue at least.

9. Dairy management

WSPA is particularly concerned with dairy management, given mega dairies are an increasing trend internationally, and in Australia. We understand most dairy cattle in Australia are not in tie stalls or tethered, but in free stalls with feed pads and some access to grazing for health and production reasons. Shade and shelter provision is still, however, an issue and as previously mentioned for production and welfare reasons dairy cattle on pasture must have access to daily shade and shelter. **This must be an overall standard in section 3 and reinforced in a standard in section 9 specifically for dairy cattle.** S9.2 and actions to minimize heat stress are not adequate – planning to prevent it (and also cold stress) is required. Once significant heat or cold stress has occurred, the welfare and production of the animal is already compromised. Access to water at all times again should be a fundamental standard as in section 1, not a guidance note for during hot weather as in G9.7. We recommend:

‘a person in charge must provide access to clean, water and shade/shelter at all times to prevent cold and heat stress of cattle’

The guidance notes are inadequate to inform compliance for appropriate bedding and space requirements, and thus do not safeguard against the various issues of behavioural and physical requirements for good dairy cattle welfare. As the emerging practice of feed pads is established, there is a responsibility for such standards to guide and safeguard good dairy cattle welfare. In addition, given one of the key causes for mastitis can be poor maintenance and hygiene of milking equipment, guidance notes G9.1 and 9.2 must be elevated to standards. Similarly,

lameness is one of the largest welfare issues causing acute and chronic pain and suffering of dairy cattle. An Australian Standard to assess and record the incidence, and manage the reduction of lameness is required to seriously tackle this issue.

10. Beef feedlots

WSPA is opposed to farming practices that do not provide for the basic needs of the animals. Feed-lotting practices often fail to provide adequate shade/shelter, adequate space for exercise, and obviously grazing and related normal behaviours. This is an intensive farming practice that needs not only to minimise the risk to cattle welfare, but actually provide elements of positive welfare to replace some of the normal behaviours it prohibits. It is uncertain whether these Standards also apply to pre-shipment holding and feeding facilities, which are similar to feedlots.

A basic standard that must be required – is the provision of shade/shelter which is accessible daily. Shade or cover being provided in only some feedlots is not acceptable. With computer modeling available and used for risks of heat stress and plans, prevention not just reduction of heat stress should be the aim of the relevant standards. There should also be some targets set for respiratory disease and other high incidence concerns in feedlot situations.

Heifers and cows must be pregnancy tested on arrival to feedlots, to enable appropriate management and all new cattle must be inspected for injury and illness. This would convey elevation of G10.6 and G10.8 to standards. G10.3, 10.4 and 10.14 should also be elevated to standards to monitor basic animal welfare and require appropriate management to reduce injury and dehydration. There is also a need for further research for space requirements (if the majority of space requirement research relates to indoor feedlots, as the discussion paper notes) and the need and suitability of enrichment, as would be considered for other species in intensive farm systems.

All animals should have daily access to a dry area of adequate dimension to allow them to lie down comfortably, walk and turn around, as a minimum without significant interference of other animals.

Space requirements previously talk about area dimensions, but this also depends on climate (including humidity, cloud cover, ambient temperatures, rainfall etc). Standards could look to outcome oriented approaches and recording available *dry space per numbers of animals per pen*, similar to S10.2 for feeding requirements and records.

11. Humane killing

In line with existing ESCAS standards, (unless the animal can be quickly and safely treated) casualty animals must be killed humanely and immediately, and must be confirmed dead (before processing). These are verifiable standards and superior to draft standards S11.2 where euthanasia 'at first reasonable opportunity' is required for even casualty cattle and S11.4a 'person killing cattle must take *reasonable action* to confirm the animal is dead'. Confirmation of death is easily achieved with basic knowledge.

The standard could be simply reworded: '*a person killing cattle must confirm the animal is dead*'.

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Although a suitable free-bullet method is acceptable, the guidelines should recommend a handheld stunning device and a back-up device, especially for larger feedlots and a minimal stun to stick or pith time of 60 seconds - as a safer alternative to free bullet options, again especially in feedlots on concrete. High neck cut (cervical 1 location) should be recommended for the neck cut option.

References used in addition to those mentioned in the discussion papers:

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