

Submission for the Australian Animal Welfare Standards and Guidelines- Sheep

Dear Committee,

As a concerned member of the public, I would like to take this opportunity to comment on the Draft Australian Animal Welfare Standards: Sheep Standards and Guidelines. It is an expectation of the community that the Standards and Guidelines will ensure the humane treatment of every individual livestock so that animals do not experience distress, fear and pain in the everyday handling and husbandry procedures on farm and livestock premises.

General Comments

The Sheep Standards and Guidelines in their current form do not adequately address this basic community expectation of an assurance of high level humane outcomes in the various livestock production systems. The draft Sheep Standards and Guidelines fail to significantly raise the bar on current animal welfare practices for the following reasons:

- I. Many of the Standards are described as ‘outcome based’, resulting in confusion and misunderstanding, as well as posing difficulties for prosecution. These need to be revised and modified accordingly.
- II. Many of the Standards are not specific and therefore are open to interpretation resulting in weak legislation and poor enforceability. Greater improvement to the welfare of livestock could be achieved by adopting more prescriptive and higher welfare Guidelines into the Standards.
- III. The inclusion of weak terminology such as “reasonable”, “unreasonable”, “appropriate” and “relevant” in the Standards would be difficult to enforce as they are weak in legislative intent. The use of ambiguous terminology in a Standard reinforces current sub-optimal industry practices rather than improving industry welfare performance. At the very least “appropriate” should be uniformly replaced with “reasonable”, which would need to be specified in the glossary and must include timeliness.
- IV. Where a high welfare risk is known to be associated with specific practices and these have been described as Guidelines, it is recommended that these become Standards.
- V. The process following the closure of the public submissions to finalise the Sheep Standards and Guidelines document should be described.

Sections

I. Responsibilities

Standards:

S1.1 SUPPORT

Guidelines:

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

II. Feed and water

Objective: MODIFY

Sheep have access to REASONABLE feed and water to ~~minimize the risk to their welfare~~ PREVENT HUNGER AND THIRST, AND TO MEET PHYSIOLOGICAL REQUIREMENTS.

Standards:

S2.1 REPLACE WITH MODIFIED G2.1

Sheep ~~should~~ MUST have access to REASONABLE feed and water daily, except where management practices such as shearing, preparation for sale, transport, slaughter and drenching, result in a longer period of water deprivation, to a maximum of 36 hours.

Additional Standards:

S2.2 A person in charge must ensure that sheep are not less than a body condition score of 1.5 (using a scale of 1 to 5, with 1 being very emaciated and 5 being very fat)

Guidelines:

G2.1 USED TO REPLACE S2.1

G2.2, G2.3, G2.4, G2.5, G2.6, G2.7, G2.8, G2.9, G2.10 SUPPORTED

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

Objective: SUPPORTED

Standards:

S3.1 SUPPORTED

S3.2 SUPPORTED

S3.3 MODIFY

A person in charge must ensure REASONABLE treatment for sick, injured, DISTRESSED, or diseased sheep ~~at the first reasonable opportunity.~~

Additional Standards:

S3.4 G3.3 TO BECOME S3.4

A person in charge must ensure that sheep that appear to be isolated from the flock, caught in structures or bogged are inspected immediately and REASONABLE action taken.

S3.5 (G3.6 TO BECOME S3.5)

A person in charge must ensure that sheep and lambs are provided with adequate shelter. In the absence of natural protection, ~~consideration should be given to~~ THIS MAY INCLUDE the provision of shade, windbreaks or sheds.

S3.6 (G3.7 TO BECOME S3.6)

A person in charge must ensure that shorn sheep are given protection during cold conditions and sudden weather changes.

S3.7 (G3.10 TO BECOME S3.7)

Predator control programs MUST be implemented where predation is a risk to the welfare of sheep.

S3.8 (G3.12 TO BECOME S3.8)

Unexplained disease or deaths MUST be investigated to formulate REASONABLE remedial and preventive actions.

Guidelines:

G3.1, G3.2, G3.4, G3.5, G3.8, G3.9, G3.11, G3.13, G3.14, G3.15, G3.16 SUPPORTED

G3.3, G3.6, G3.7, G3.10 - CONVERT TO ADDITIONAL STANDARD

IV. Facilities and equipment

Objective: SUPPORTED

Standards:

S4.1 SUPPORTED

Additional Standards:

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

A person in charge must ensure that shade is provided in hot weather in outdoor pens, where sheep are penned for extended periods.

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

A person in charge must ensure that floor surfaces are nonslip, nonabrasive and free-draining. Concrete is only recommended for high-traffic areas.

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

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

Guidelines:

G4.5 SUPPORTED

V. Handling and husbandry

Objective: SUPPORTED

Standards:

S5.1 MODIFY

A person in charge MUST NOT:

2) THROW OR DROP sheep

3) STRIKE sheep. "STRIKE" to be defined in glossary as 'to hit with force'.

7) BREAKING OR DISLOCATING the tail is NOT permitted.

S5.2 MODIFY

A person in charge of a dog that bites sheep MUST be muzzled when working sheep. OR make mandatory that all dogs must be muzzled.

S5.3 SUPPORTED

S5.4 MODIFY

Electric prodders MUST NOT be used on sheep.

S5.5 SUPPORTED

S5.6 SUPPORTED

S5.7 MODIFY

A person in charge MUST NOT tether sheep.

Additional Standards:

S5.8 (G5.2 TO BECOME S5.8)

A person in charge must ensure that extra care is taken when handling sheep with special needs – for example young lambs, heavily pregnant ewes, lame sheep and rams.

S5.9 (G5.7 TO BECOME S5.9)

A person in charge must ensure that overcrowding of sheep in pens or yards does not occur and that precautions are taken to prevent smothering, especially of lambs and weaners.

S5.10 (G5.15 TO BECOME S5.10)

A person must ensure that horn trimming does not damage soft tissue.

S5.11 (G5.17 TO BECOME S5.11)

A person in charge must ensure that sheep fitted with nets or coats are inspected regularly to ensure that they do not become tangled, cast or adversely affected by grass seeds.

S5.12 (G5.19 TO BECOME S5.12)

A person must ensure that care is taken when shearing and crutching to minimize cuts, and severe cuts must be treated appropriately.

S5.13 (G5.20 LAST DOT POINT TO BECOME S5.13)

A person in charge must ensure that REASONABLE and adequate feed and water is available to newly shorn sheep.

S5.14 (G5.21 TO BECOME S5.14)

A person in charge must ensure that rams that are sedated for shearing or crutching, and are managed to prevent exposure, sunburn and smothering in accordance with the directions of the prescribing veterinarian.

S5.15 (G5.22 TO BECOME S5.15)

A person in charge must ensure that sheep that grow and retain long wool are shorn annually.

S5.16

A person in charge must ensure that wool is removed from the face of a sheep, if the sheep is unable to see.

Guidelines:

G5.20 MODIFY

Remove last dot point (as converted to S5.14)

G5.1, G5.3, G5.4, G5.5, G5.6, G5.8, G5.9, G5.10, G5.11, G5.12, G5.13, G5.14, G5.16, G5.18, G5.20
SUPPORTED

VI. Tail docking and castration

Objective: SUPPORTED

Standards:

S6.1 SUPPORTED

S6.2 MODIFY

A person MUST NOT tail dock sheep without pain relief.

S6.3 MODIFY (INCORPORATE G6.19)

A person must DOCK THE TAIL THROUGH THE JOINT SPACE and leave a docked tail stump of a sheep with at least two “palpable free joints” remaining

S6.4 MODIFY

A person must not castrate or use the cryptorchid method on sheep that are more than THREE MONTHS old without using pain relief and haemorrhage control.

Additional Standards:

S6.5 (G6.2 TO BECOME S6.5)

A person MUST NOT tail dock or castrate a lamb less than 24 hours old.

S6.6 (G6.8 TO BECOME S6.6)

A person must ensure that lambs are appropriately restrained in a lamb cradle and, must be released to land on their feet to avoid contact of the wound (s) with the ground.

S6.7 (G6.10 TO BECOME S6.7)

A person must ensure that haemorrhage is minimised by selecting a REASONABLE method, preventing overheating of lambs and allowing them to settle after mustering.

S6.8 (G6.11 TO BECOME S6.8)

A person must ensure that tail docking and castration are not undertaken during extreme weather.

S6.9 (G6.13 TO BECOME S6.9)

A person in charge must ensure that sheep are inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and REASONABLE action taken.

S6.10 (G6.16 TO BECOME S6.10)

A person must not muster and yard lambs until wounds are healed.

S6.11 (G6.18 TO BECOME S6.11)

A person using a hot knife must ensure that it is operated at the recommended temperature.

S6.12 (G6.21 TO BECOME S6.12)

A person must not dock the tail for cosmetic reasons or on fat-tail sheep breeds.

Guidelines:

G6.3 MODIFY

Lambs should be tail docked, castrated or made cryptorchid no younger than two weeks old.

G6.19 REMOVE AS INCORPORATED INTO S6.2

G6.1, G6.4, G6.6, G6.7, G6.9, G6.12, G6.14, G6.15, G6.17, G6.20, G6.22 SUPPORTED

VII. Mulesing

Objective: MODIFY

In circumstances where mulesing is necessary for the long-term welfare of the sheep AND NON-SURGICAL ALTERNATIVES CANNOT BE IMPLEMENTED, it is done in a manner that minimises the impact of the procedure.

Standards:

S7.1 MODIFY

Only accredited operators who have the relevant knowledge, experience and skills are to perform mulesing on sheep.

S7.2 MODIFY

A person MUST NOT mules sheep that are less than 24 hours old or more than 12 weeks old.

S7.3 MODIFY

A person MUST NOT mules any sheep without using pain relief.

S7.4 SUPPORT

S7.5 MODIFY

A person mulesing sheep MUST ONLY remove SUFFICIENT WOOL-BEARING SKIN REASONABLE TO THE CONFORMATION OF THE LAMB BEING TREATED TO ACHIEVE FLYSTRIKE PROTECTION. NOTE: This amalgamates G7.5.

Additional Standards:

S7.6 (G7.1 TO BECOME S7.6)

Before permitting mulesing to be undertaken, the owner of the sheep must demonstrate that other options for breech strike prevention have been considered including (as per G7.1);

- Selection for resistant conformation
- Culling susceptible sheep
- Clips
- Crutching
- Timing of shearing
- Chemicals for flystrike prevention
- Internal parasite control

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

A person in charge must only allow mulesing when there are no alternatives and the procedure results in:

- Benefits to life-time sheep welfare
- Better flock management
- A reduced work (occupational) health and safety risk.

S7.8 (G7.9 TO BECOME S7.8)

A person in charge must ensure that the risk of infection is minimized through good hygiene practices in relation to facilities, hands, handling and instruments.

S7.9 (G7.12 TO BECOME S7.9)

A person in charge must ensure that lambs are appropriately restrained in a lamb cradle and must be released in a manner that ensures they land on their feet to avoid contact of the wound with the ground.

S7.10 (G7.17 TO BECOME S7.10)

A person in charge must ensure that sheep are inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and REASONABLE action taken.

S7.11 (G7.18 TO BECOME S7.11)

After placement in paddocks, a person must not forcibly muster and yard lambs until mulesing wounds are healed.

S7.12 (G7.20 TO BECOME S7.12)

A person must not perform mulesing during extreme weather.

Guidelines:

G7.5 RECOMMEND TO AMALGAMATE WITH S7.5

G7.6 MODIFY (as maximum permitted age is recommended to be 12 weeks)

Where mulesing is performed, lambs should be at least 2 weeks of age.

G7.8 REMOVE - RECOMMENDED AS A STANDARD

G7.2, G7.3, G7.4, G7.10, G7.11, G7.13, G7.14, G7.15, G7.16, G7.19 SUPPORTED

VIII. Breeding management

Objective: SUPPORT

Standards:

S8.1 MODIFY

A person performing artificial breeding procedures on sheep must TAKE REASONABLE ACTION TO MINIMISE PAIN, DISTRESS OR INJURY TO SHEEP.

S8.2 MODIFY

A person MUST BE a qualified veterinarian to perform surgical embryo transfer and laparoscopic insemination of sheep.

Additional Standards:

S8.3 (G8.1 TO BECOME S8.3)

Technicians responsible for breeding management MUST have an understanding of the reproduction and behaviour of both the ewe and the ram.

S8.4 (G8.3 TO BECOME S8.4)

A person in charge must ensure that in the last 4-6 weeks of pregnancy, management practices minimize stress on ewes to reduce pregnancy toxemia and other metabolic diseases.

S8.5 (G8.4 TO BECOME S8.5)

A person in charge must ensure that lambing ewes are monitored, and disturbed as little as possible.

S8.6 (G8.5 TO BECOME S8.6)

A person in charge must ENSURE that ewes affected by severe injuries or lambing complications (prolapsed uterus, dystocia) receive urgent treatment or be humanely killed without delay.

S8.7 (G8.6 TO BECOME S8.7)

A person in charge must ensure that lambing ewes are placed in a sheltered paddock with REASONABLE FEED, when there is a risk of cold, wet or windy weather.

S8.8 (G8.7 TO BECOME S8.8)

A person in charge must ensure that predators are controlled before and during lambing.

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

A person in charge must ensure that weak or orphaned lambs with very little chance of survival MUST be humanely killed.

S8.10 (G8.14 TO BECOME S8.10)

Laparoscopic artificial insemination and embryo transfer MUST be done using sedation, analgesia and aseptic technique.

S8.11 A person MUST NOT use electro-ejaculation to obtain semen from rams.

Guidelines:

G8.12 DELETE as S8.2 prohibits non-veterinarians from conducting artificial breeding techniques.

G8.13 DELETE as S8.11 prohibits use of electro-ejaculation for semen collection.

G8.2, G8.8, G8.10, G8.11 SUPPORTED

IX. Intensive sheep production systems

Objective: SUPPORT

Standards:

S9.1 MODIFY

A person in charge must ensure that feed is available daily to sheep in intensive production systems.
MAKE WATER ACCESS SEPARATE STANDARD – S9.8.

S9.2 SUPPORTED

S9.3 SUPPORTED

S9.4, S9.5 SUPPORTED

S9.6 MODIFY

A person in charge must ensure sufficient space to allow all sheep to lie on their sternums WITH LEGS OUTSTRETCHED AND WITHOUT TOUCHING EACH OTHER at the same time in an intensive production system.

S9.7 Single penning of sheep for commercial production is NOT permitted.

Additional Standards:

S9.8 (G9.1 TO BECOME S9.8)

A person in charge must ensure that drinking equipment MUST be inspected regularly and maintained to ensure its correct operation, and that pipes, taps and ball valves are not blocked.

S9.9 (G9.2 TO BECOME S9.9)

A person in charge must ensure that water troughs are cleaned as required to prevent contamination.

S9.10 (G9.3 TO BECOME S9.10)

A person in charge must ensure that feed troughs are cleaned as required to prevent faecal contamination and build-up of stale and spoiled feed and dust.

S9.11 (G9.4 TO BECOME S9.11)

A person in charge must ensure that trough space is adequate for the feeding system to allow the daily intake of feed and water, and to minimize bullying and shy feeders.

S9.12 (G9.6 TO BECOME S9.12)

A person in charge must ensure that the diet provided IN INTENSIVE PRODUCTION SYSTEMS promotes rumination.

S9.13 (G9.7 TO BECOME S9.13)

A person in charge must ensure that the sheep in intensive wool production systems MUST be maintained at or above a body condition or fat score or two out of five (five is fattest).

S9.14 (G9.13 TO BECOME S9.14)

A person in charge must ensure that lighting in indoor systems is adequate to allow inspection of all sheep.

S9.15 (G9.15 TO BECOME S9.15)

A person in charge must ensure that REASONABLE ACTION IS TAKEN TO alleviate wool biting and other stereotypic behaviours shown by sheep in intensive production systems.

S9.16 (G9.16 TO BECOME S9.16)

A person in charge must ensure that prior to entry into an intensive system are inspected for disease and injury and REASONABLE treatment undertaken.

S9.17 (G9.17 TO BECOME S9.17)

A person in charge must ensure that a biosecurity plan is in place for introduction of sheep into an intensive production system.

S9.18 (G9.18 TO BECOME S9.18)

A person in charge must ensure that hospital pens are used for sick or injured sheep in intensive production systems.

S9.19 (G9.19 TO BECOME S9.19)

A person in charge must ensure that dead sheep are removed promptly in intensive production systems.

S9.20 (G9.25 TO BECOME S9.20)

A person in charge must ensure that shade and shelter is provided to prevent heat and cold stress IN INTENSIVE PRODUCTION SYSTEMS.

S9.21 (G9.26 TO BECOME S9.21)

A person in charge must ensure that all ventilation equipment is checked regularly to ensure it is fully operational.

S9.22 (G9.27 TO BECOME S9.22)

A person in charge must ensure that indoor housing systems with controlled or forced ventilation that rely on automatic equipment is inspected daily, or have a back-up systems to warn of mechanical failure.

S9.23 (G9.30 TO BECOME S9.23)

A person in charge must ensure that fire alarms and adequate fire fighting equipment is fitted and maintained in all indoor housing systems.

S9.24 A person in charge must ensure that REASONABLE bedding is provided and maintained in a hygienic state where sheep are penned for more than 10 days and there is a risk to welfare including abrasions and cellulitis.

S9.25 A person in charge must ensure that water is constantly available to sheep in intensive production systems.

S9.26 A person in charge must be ensure that sheep in intensive production systems are inspected daily.

Guidelines:

G9.5, G9.8, G9.9, G9.10, G9.11, G9.12, G9.20, G9.21, G9.22, G9.23, G9.24, G9.28, G9.29 SUPPORTED

G9.7 & G9.14 NOT SUPPORTED. RECOMMEND NEW STANDARD.

X. Humane killing

Objective: SUPPORTED

Standards:

S10.1, 10.2, 10.3 SUPPORTED

S10.4 MODIFY

A person killing sheep must ~~take reasonable action to~~ confirm the sheep is dead.

S10.5 MODIFY

A person killing a lamb by a blow to the forehead must ensure that the lamb weighs less than 10 kilograms AND MUST BE DONE BY A SINGLE, SHARP BLOW DELIVERED TO THE CENTRE OF THE FOREHEAD.

S10.6 MODIFY

A person must not kill a conscious sheep by bleeding out using a neck cut.

Guidelines:

G10.3 converted to S10.5

G10.4 – If S10.6 is supported, retain G10.4 as is.

Regards,

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