

**Sheep Welfare Standards and Guidelines – Public Consultation Submission
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VARIATION C2 – NOT SUPPORTED

Public consultation question 22: Do you believe that the benefits likely to be achieved under Variation C2 of Option B, including the welfare benefits of requiring mulesing to be performed under 6 months of age and reduction in excess regulatory burden, are justified? – **NO**

Would the combination of costs and benefits under and Variation C of Option B be superior to other options? - **NO**

RATIONALE: - VARIATION C2

1: Although it may be commonly held “edict” that younger animals do not experience *pain* to the same extent as older ones – it should be noted that this has been refuted in studies of human neonates, and there is minimal, if any scientific evidence to support this conclusion in lambs undergoing mulesing except perhaps in the first 24 hours of life. However mulesing is not undertaken in the first 24 hours of life, and rarely even in the first week.

2: The welfare impact of mulesing is NOT related to pain alone. The welfare impact of mulesing is also highly related to stress, separation, dehydration, mismothering, mortality, wound infection and wound healing. All these factors may be heightened risks in younger versus older lambs.

3: There are many reasons to expect that the welfare impact of mulesing may be GREATER in younger lambs and LESS in older lambs (5-6 months).

- The principle reason for this is that the surface area of the wound as a ratio of total body skin surface area is greater in younger lambs than older ones. (This *ratio* impacts on the over-all metabolic impact of the procedure on the lamb – much like the impact of a burn is determined by the percentage of skin surface area that it affects)
- Younger lambs are dependent on their mothers for fluids. Time apart and fluid loss can make them more prone to dehydration than older lambs. Younger lambs are also more prone to mismother. Dehydration and mismothering can have a serious negative impact on recovery.
- Trials by our group appear to confirm that welfare impacts may be greater in younger than older lambs. 2 wound healing trials were conducted to examine wound healing rates post mulesing. Trial 1 was undertaken on lambs 5-6 months of age. Trial 2 on lambs 8-12 weeks of age. Although trials were undertaken to examine the impact of pain relief – it was noted that wound healing rates were significantly faster (90% healed by 4 weeks versus 6 weeks), and mortality rates lower (zero versus 3% mortality) in the cohort of older lambs (5-6 months) than younger lambs (8-12 weeks) post the procedureⁱ.

4: The seasonal timing of mulesing can have an important impact on welfare. VARIATION C2 may also have a negative impact on welfare by LIMITING farmers options to time mulesing to take advantage of optimal seasonal conditions. There are significant welfare risks if mulesing is performed in hot conditions and

/ or during periods of high fly activity. These factors can increase dehydration, blood loss, wound infection rates and delay wound healing. For this reason many farmers choose not to mulesing spring born lambs until the weather has cooled and fly activity has ceased (usually in late autumn) – by this stage lambs will be between 5-6 months old. (It should be noted that cold weather has advantages with regard to reducing bleeding, increasing skin contraction, and reducing incidence of wound infection). Seasonal timing is hence a critically important management tool to reduce the welfare impact of mulesing. Introducing a “6 month cut-off” may force farmers to mulesing spring born lambs during times of seasonal unsuitability and could thus worsen recovery, wound healing and survival rates...and have a major negative impact on welfare. For this reason alone, if an “age limit” is desired it should be a minimum of 9 months.

4: A final potential welfare benefit of performing mulesing in *older* lambs is that the need for the procedure may be removed and / or the minimized – this is because a) lambs can “grow into their skin” – (i.e. they may appear to have higher degrees of breech wrinkle as very young lambs, than they display as older lambs). Also, lambs may end up “culled” or sold – and not being kept for wool production.

IT IS STRONGLY ADVISED THAT THIS VARIATION IS NOT ADOPTED, as

- a) there is minimal if any evidence to indicate that it will improve welfare
- b) it will increase regulatory burden and pose a high risk of having a MAJOR NEGATIVE IMPACT on WELFARE.

ⁱ **Impact of topical anaesthesia on pain alleviation and wound healing in lambs after mulesing.**

Lomax S, Sheil M, Windsor P.A. Aust Vet J. 2008 May;86(5):159-68;

“CONCLUSION: Tri-Solfen effects rapid and prolonged wound analgesia, reduction in pain-related behaviour and improved wound healing in lambs undergoing routine mulesing, providing effective alleviation of pain associated with routine mulesing in sheep”.

Use of local anaesthesia for pain management during husbandry procedures in Australian sheep flocks. S. Lomax, M. Sheil, P.A. Windsor. Small Ruminant Research Volume 86, Issue 1, Pages 56-58 (October 2009)

“CONCLUSION: Findings from a series of field and pen trials indicate that the immediate application of spray-on topical anaesthesia to mulesing, castration and tail-docking wounds, significantly reduced the pain experienced post-procedure and improved the rate of wound healing.

Note – additional (more detailed) unpublished data on these trials is available should it be required.