

**Animal Liberation Queensland**  
**Submission on**  
**Australian Animal Welfare Standards and Guidelines – Section B: Sheep**  
**04/05/2013**

**Chapter 1: Responsibilities**

*S1.1 A person must take reasonable actions to ensure the welfare of sheep under their care.*

Animal Liberation Queensland (ALQ) has considerable concern about the use of words such as 'reasonable'. What are considered reasonable actions? How will reasonable actions be regulated and enforced? There does not appear to be any rules or regulations underpinning this concept of reasonable actions. This term is very broad and very vague and is open to interpretation considering the detailed guidelines that follow are not enforceable.

**This concern covers the use of 'reasonable', 'appropriate', 'adequate', or other similarly vague terms across all the Standards and Guidelines in this review.**

ALQ believes that this standard should either require 'competency' in a person's dealing with sheep and competency could be achieved by an accredited national training scheme or have many of the guidelines included as standard to ensure correct and humane handling of sheep.

**Chapter 2: Feed and Water**

*S2.1 A person in charge must ensure sheep have reasonable access to adequate and appropriate feed and water.*

ALQ believes feed and water are vital to life and access so this is a necessity. "Reasonable access" is too vague. Therefore, this standard needs to be expanded to specifically state that sheep must have access to feed and water daily. Leaving this as is could enable people to escape prosecution for cases involving a lack of feed or water.

**Chapter 3: Risk management of extreme weather, natural disasters, disease, injury and predation**

*Weather*

*G3.6 Sheep and lambs should be provided with adequate shelter. In the absence of natural protection, consideration should be given to the provision of shade, windbreaks or sheds.*

*G3.7 Shorn sheep should be given protection during cold conditions and sudden weather changes.*

Inadequate shelter for the animals or exposing shorn animals to extreme cold and adverse weather elements goes directly against any notion of good welfare. This Guideline should be a Standard.

**Chapter 4: Facilities and equipment**

*G4.2 – Shade should be considered in hot weather for outdoor pens where sheep are penned for extended periods.*

Shade for animals penned in hot weather is a necessity and should be incorporated into the Standards.

**Chapter 5: Handling and management**

*S5.1 A person must handle sheep in a reasonable manner and must not:*

*3) – strike in an unreasonable manner, punch or kick:*

ALQ believes the current Standard is insufficient and only says the sheep must not be struck in an "unreasonable manner". This Standard is very ambiguous and open to many different interpretations and needs to be changed to ensure the welfare of the sheep is protected.

*S5.4 – A person must consider the welfare of sheep when using an electric prodder, and must not use it: ...:*

ALQ does not support the use of electric prods and calls for a complete ban on their use.

## **Chapter 6: Tail docking and castration**

*S6.1 – A person performing tail docking or castration 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.*

Only veterinarians must do these procedures and all must be done with pain relief.

### *Tail Docking*

*G6.21 – Tail docking should not be done for cosmetic reasons or on fat-tail sheep breeds.*

“Tail docking must not be done for cosmetic reasons” must be a Standard.

### *Castration*

*G6.22 – Lambs destined for slaughter before they are 12 weeks old, or before the onset of puberty, should not be castrated:*

This Guideline should be included in the Standards. Any castrations done on these animals is a painful and completely unnecessary procedure.

## **Chapter 7: Mulesing**

ALQ calls for a complete ban on mulesing.

This review should also set a phase out date that is mandatory. Then until this practice is phased out mandated training courses and pain relief must be included in the Standards to ensure competent people are performing this procedure and the animal do not suffer unnecessarily in this very painful and invasive procedure.

## **Chapter 8: Breeding management**

*S8.1 A person performing artificial breeding procedures on sheep must not cause unreasonable pain, distress or injury to sheep.*

This standard requires pain relief to be mandated. The Standard then could read “a person performing artificial breeding procedures on sheep must ensure their actions cause no pain, distress or injury”.

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

Only a veterinarian should be allowed to perform these invasive procedures. Pain relief must also be mandated this for Standard.

*G8.1 Technicians responsible for breeding management should have an understanding of the reproduction and behaviour of both the ewe and the ram.*

This guideline must be included in the Standard. It must be a prerequisite for anyone undertaking this kind of work to understand the process in both ewes and rams.

*G8.5 Ewes that receive severe injuries during lambing or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove lamb) should receive urgent treatment, or be humanely killed without delay.*

To leave ewes in a state of distress such as described in this guideline is contrary to good animal welfare. If the objectives of breeding management are to be achieved, this guideline must be made into a standard.

*G8.9 Weak or orphaned lambs with very little chance of survival should be humanely killed.*

This guideline must be a standard. Abandoning unviable lambs to starve to death, die of hypothermia or dehydration is completely unacceptable.

*G8.13 Semen collection using artificial vagina should be used in preference to electro-ejaculation.*

To bring the standards in line with current science, the use of electro-ejaculation method should be banned. Guideline G8.13 should be a Standard and state only artificial vagina collection is to be used.

## **Chapter 9: Intensive Sheep Production Systems**

*S9.6 A person in charge must ensure sufficient space to allow all sheep to lie on their sternums at the same time in an intensive production system.*

This Standard is totally inadequate as it only allows the sheep to lie in an upright kneeling position. The minimum requirement of this standard, and to ensure appropriate animal welfare, should be that there is enough space for the sheep to lie down in lateral recumbency. Ideally, ALQ would like to see intensive production systems banned.

*G9.6 Sufficient fibre should be provided in the diet to promote rumination.*

This Guideline must be made a Standard if the objective and good animal welfare is to be achieved.

*S9.7 A person in charge must ensure a sheep housed in a single pen for fine wool production is able to turn around, see, hear, smell and touch neighbouring sheep.*

There appears to be some conflict between this Standard and Guideline 9.14 which states "Sheep should not be housed in single pens". The current wording of S9.7 is unacceptable; G9.14 should be made a Standard in its place.

### *Facilities and environment*

*G9.25 Shade and shelter should be provided to prevent heat and cold stress.*

It is unacceptable that no protection from heat and cold stress is mandated in the Standards. G9.25 must be made a Standard.

## **Chapter 10: Humane Killing**

*S10.2 A person killing a sheep must have the relevant knowledge, experience and skills to kill the sheep humanely, or be under the direct supervision of a person who has the relevant knowledge, experience or skills unless:...*

ALQ submits that to ensure all animals in this situation are killed as humanely as possible, the use of relevant Guidelines in this standard needs to be reconsidered. The incorporation of many of the Guidelines will help ensure that the most appropriate killing methods are employed.

*S10.5 A person killing a lamb by a blow to the forehead must ensure that the lamb weighs less than 10 kilograms.*

ALQ submits that all sheep, including lambs, should be killed as humanely as possible. The method of killing using a blow to the forehead should be banned.

*S10.6 A person must only use bleeding-out by neck cut to kill a conscious sheep when there is no firearm, captive bolt or lethal injection reasonably available.*

The term "reasonably available" is far too vague. This method of killing a conscious sheep should be banned or restricted to clearly defined and limited emergency situations.

*G10.1 The poll method is the preferred method for killing sheep (see Figure 10.1)*

It is recommended in these guidelines be Standards.

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