



6th May 2013

Submission for the proposed Australian Animal Welfare Standards and Guidelines for Sheep

**“In considering the use of pain relief, sheep should be given the benefit of the doubt”**  
(Australian Animal Welfare Standards and Guidelines for Sheep, pp.7). **It is our contention that this noble position is not reflected by the proposed guidelines, particularly where mutilating procedures like tail docking, mulesing and castration are concerned.**

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## Analgesia and Mutilating Procedures

The proposed guidelines and discussion papers suggest an upper age limit of 6 months before mandating the use of analgesia for pain arising from castration, mulesing and tail docking. We believe this standard to be flawed. If, that is, animal welfare is a serious, indeed, sincere concern in the (re)development of nationwide industry standards.

The suggestion of six months is based on industry 'feasibility', where the public is expected to accept that large scale farming enterprises should make no effort to increase their commitment to animal welfare through improved animal husbandry practice which truly meets the needs of the animals in their care. Guidelines which allow mutilating procedures to be done without analgesia if sheep are under 6 months of age offer nothing in the way of animal welfare. The presumption, and it is quite false, is that animals below the age of 6 months of age will not suffer as a result of these procedures.

Such a proposal, applied to all mutilating procedures, appears to encourage industry efficiency in the completion of procedures at an early stage of the animals life. This appears to be due to the difficulty of estimating the age of sheep after 12 months of age, reflecting the concerns of how the regulatory body functions rather than a genuine attempt to address animal welfare concerns.

“The valid outcome sought” (Sheep Castration Discussion Paper, pp.2) in guidelines on castration suggest the procedure be performed only “where necessary and in a manner that minimises pain and distress.” If this were so, greater consideration would be given to the justification for mutilating procedures based on welfare rather than efficient animal husbandry, alternative methods would be advocated, and adequate analgesia required without exception.

The discussion of research comparing different methods of castration (as with tail docking or fly strike prevention), and the pain resulting from these, illustrates a contradiction in how science is used to support industry convenience through the public consultation process. A clearer reading of the research would result in the following conclusion: **all of these commonly practiced procedures cause considerable pain and suffering.** Changes in behaviour and measured cortisol levels confirm this.

**Further, the utility and justification for mutilating procedures is questionable given alternatives practices and farm conditions that do not necessitate them.**

For example, the Burdizzo clamp, rarely used in Australia, is considered the kindest method of castration on the farm due to the absence of incision or long lasting compression (rubber ring), yet it too warrants the use of analgesia due to the blunt force trauma involved.

Studies on the use of analgesics for pain indicate time, technical care and veterinarian involvement prove most effective in reducing the suffering of animals exposed to mutilating procedures. The scientific evidence indicates this to be so, and 'cherry picking' research results, highlighting 'ideals' from a series of non ideal options or extrapolating results from research on different procedures according to convenience, cannot prove otherwise.

For example, the consideration of topical analgesia in the discussion papers focuses on short term effect (many hours rather than many days), as though the healing of significant wounds and inflammation have a short pain producing period with rapid healing.

The reference to provision of analgesia in the guidelines fails to specify the differential value of various analgesia options, where topical forms for surgical procedures have limited welfare value. Similarly, the extent of tissue damage associated with a procedure like mulesing ought to require analgesia options that extend well beyond the 4, 8, 12 and 48 hour benchmarks commonly used for research. "In considering the use of pain relief, sheep should be given the benefit of the doubt" (pp.7) and yet the guidelines do not effectively transmit this intention.

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## The Prevention of Fly Strike

In light of alternative methods of animal husbandry, the justification for tail docking and mulesing to prevent fly strike is not nearly as certain as is presented. For this reason, it is disappointing to see that the wool industry has failed to meet their own goal to phase out the practice by 2010. **Further disappointment is felt by the present guidelines as they support the continued practice of these procedures, with minimal consideration of the suffering caused by such.**

The geographical areas where fly strike proves particularly problematic are not elaborated in the guidelines, so it is left to the subjective position of farm operators who will likely choose the least costly option when assessing risks and costs of alternatives. **Where guidelines provide room for subjective interpretation, industry typically prove unreliable in adhering to the best welfare option, and accusations of breached guidelines become difficult to uphold.**

There is sufficient evidence to show that a combination of crutching and use of chemicals at the correct time is more effective than mulesing. In fact, it was the Australian Wool Corporation that set about convincing graziers of the advantage gained by mulesing over regular inspection and crutching – the advantage was entirely economic and at great cost to sheep (Phillips, 2009, "A Review of Mulesing and Other Methods of Fly Strike Prevention in Sheep" Animal Welfare, 18, pp.113-121). Phillips notes the scientific research indicating either single or combinatory analgesia treatment were "ineffective in attenuating the effects of mulesing" (Ibid, pp.115).

Behavioural indicators of stress have been recorded by research 3 to 4 days after the mulesing

procedure. This is the 'visible' sign of animal suffering, which may continue considerably longer as wounds take time to heal. Again, the proposed guidelines regarding analgesia, particularly for sheep under 6 months of age, gives scant consideration to the animal welfare aspect of 'standard' animal husbandry in Australia.

**Mulesing could cease in this country** if there were greater lines of communication between neighbouring farms, analysis of weather conditions for the most effective implementation of alternative procedures, blow fly control systems, and appropriately timed crutching and chemical application. Better animal husbandry, to ensure disease and appropriate feed are controlled, minimising diarrhoea, serve to further enhance the non mulesed control of fly strike.

We consider this approach to be a considerable improvement on mulesing, but one not without concern. **The guidelines fail to stipulate appropriate chemicals for the purpose of preventing fly strike, where all organophosphates prove problematic to the health of the animal, the environment and farm operators.**

The selective breeding of sheep has had considerable success thanks to research centres like Adelaide University. However, no explanation has emerged for why alternative breeds without a propensity for fly strike have not been enthusiastically taken up by the grazing community. Where animal welfare is not sincerely of concern, entrenched practice will continue. Unless, of course, it is challenged by codes of practice and regulatory guidelines (which are enforced).

Regarding the acceptable length to which the tail of sheep may be docked, 3 palpable joints is preferred over two, as it allows room for error in the procedure. A tail docked too short, even by a single joint, results in increased risk of cancer and an inability to wave away flies. Three palpable joints allows for error by operators who are not trained veterinarians. This position, of a minimum of 3 palpable joints, is in preference to the proposed guidelines of 2 joints. However, for the same reasons as our position on mulesing, **given the availability of better husbandry practices, we are in opposition to any tail docking procedure, particularly where not performed by a veterinarian with long acting analgesia.**

Regrettably, the AVA's recommendation for all operators to be accredited before carrying out mulesing has not been included in the guidelines. 'Supervision' by a skilled operator, under the stressed work conditions associated with large scale operations falls well short of the AVA's recommendations. **We, however, would support such procedures only being performed by veterinarians skilled in the procedure. And only performed where absolutely necessary.**

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## Environmental Conditions

While early (rather than later in life) castration, tail docking and mulesing is eminently justified, the proposed regulations around how the procedures are performed will continue to prove difficult to adhere to in many cases due to the environmental conditions of farms.

The environmental conditions required by the proposed guidelines will likely prove unworkable in many sites around Australia for much of the year. Farmers may be able to provide secure and separate paddocks for sheep following a mutilating procedure, they cannot control weather nor many conditions of the farm environment. **Dust, high temperatures and/or humidity are to be avoided according to the guidelines, yet these form the mainstay of environmental conditions for many rural properties.**

**Awaiting seasonal changes to suit the appropriate time for mutilating procedures, according to the proposed guidelines, may impact the recommendations regarding age.**

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## The Role of Veterinarians

The AVA explicitly call for 'skilled operators' to perform mutilating procedures if done before the age of 3 months. After this age they argue the procedure ought to be performed by a veterinarian with the use of analgesics. Yet not even this standard is considered feasible according to the current proposed guidelines. Further, **there is no explication in either the guidelines or the discussion papers of how an operator would become a 'skilled operator', nor is there consideration of how operators would be assessed as such in the case of suspected breaches of the guidelines.**

The UK Farm Animal Council supports stricter and more humane procedures in the tail docking and castration of farm animals (mulesing is not practiced in the UK), recognising that neonates feel pain and have a right to be free from such suffering. **We believe their position, that a veterinarian perform all surgical procedures with analgesia, as well as non surgical procedures on animals over 3 months of age, should form a minimum standard for the current guidelines.**

So long as there remains no formal training, assessment and accreditation for performing mutilating procedures, **we strongly recommend the requirement to have veterinarians perform such procedures with appropriate long acting analgesics.**

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Finally there is nothing in the proposed guidelines regarding inspection/regulation of adherence to the guidelines. It has become increasingly clear to the Australian public that animal welfare regulations are frequently flouted for the purpose of increased economic gain (most commonly) and sadistic satisfaction. This tends to be the case particularly where industry self-regulates or government departments representing industry carry out that function. **A third party organisation, separate from both government and industry ought to be mandated with the task of ensuring the guidelines are adhered to, and funded by both industry and the government.**

The Australian public is becoming increasingly sensitive to the way animals are bred, raised, transported and slaughtered. These guidelines are an opportunity to draw industry practice closer to the standards a caring public might expect.

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