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Australian Wool Innovation (AWI) – Submission
6th May 2013
to the
Australian Animal Welfare Standards and Guidelines for Sheep
Public Consultation Submission

To:
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AWI has been an active member and supporter of the Animal Welfare Standards and Guidelines for the Sheep Reference Group but seeks to make 2 comments in the Public Consultation phase.

- 1) The Regulation Impact Statement has raised the option in Variation C2, to restrict the age of mulesing to less than 6 months. AWI disagrees with this option on the following basis:
 - In the overwhelming majority of seasons few lambs are mulesed over 6 months of age and the practise is restricted to areas where this can provide a better welfare outcome for sheep.
 - In extreme, but not rare occurrences in some regions across Australia in any year, weather extremes and natural disasters can have such an impact on the supply of feed to the lamb and milk from the mother that, in the best welfare interests of the animal, mulesing should be delayed until seasonal conditions and the risk of other animal health challenges significantly improve. In most instances, this will occur at some stage within the lambs first 12 months of age.
 - Mulesing under six months in such conditions will put owners or persons in charge in breach of other standards such as S1.1, S3.1, S3.3 and S7.4.

In seasonal conditions that provide nutritious green feed and dams milk, there is minimal or no impact of mulesing on body weight under 12 months. As the number of challenges to both the dam and lamb increases, the impact of mulesing on body weight increases. The severity of each challenge impacts the animal, as does the combination of challenges that can vary significantly between wool growing regions and even within regions. Such challenges also include the risk of or presence of significant worm burdens or mosquitoes, bush flies or grass seed that act to delay healing and irritate the lamb. During a 12 month cycle there is normally at least one opportunity to mules where there will be minimal impact on the lamb. (Reference; Lloyd J 2012 “The impact of age of mulesing and Industry Trends over the last 50 years”, unpublished, funded by AWI).

Peter Windsor, Professor of Livestock Health & Production at the University of Sydney is currently conducting further research comparing mulesing at greater than 6 months of age to mulesing at 6 to 8 weeks.

- 2) The current Standard 6.3, “a person must leave a docked tail stump of a sheep with at least 2 palpable free joint joints remaining” is a tightening of the current Code by one joint. AWI is of the view that the standard should remain at one joint but supports the standard becoming a guideline for the following reasons;
 - The science supports leaving three joints over two and two over one however the feasibility and practicality of tightening the current Code of one joint has not been considered. It is not practical in the field to be so prescriptive especially with young animals, nor does it warrant a person being charged with breaking the law as a result, for a single animal.
 - The science supports a reference to the preferred 3 joints being included in G6.20.

(Reference Lloyd J 2012 Tail Length in Unmulesed Australian Merino Sheep”
http://images.wool.com/pub/tail_length_report_dec2012.pdf)