

THE AUSTRALIAN ASSOCIATION OF STUD MERINO BREEDERS LIMITED

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DRAFT AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES – SHEEP

RESPONSE TO THE STANDARDS AND GUIDELINES AUSTRALIAN ASSOCIATION OF STUD MERINO BREEDERS JULY 2013

INTRODUCTION

The Australian Association of Stud Merino Breeders (AASMB) is the peak national body for the Stud Merino Industry in Australia. A membership in excess of one thousand combined with its extensive individual client's lists gives the AASMB a reach across wool growers in Australia which is unsurpassed.

For AASMB members and their clients the welfare of their animals is paramount. They not only advocate good animal welfare, they set the benchmark. They are early adopters of improved technique and technology and partner government in investment into improved sheep welfare outcomes. These are the same people who provide early, adequate and practical response to the animals need when a localised welfare crisis occurs.

The AASMB is supportive of developing nationally consistent policies to improve animal welfare.

The AASMB has had little input into the document thus far. We believe this to have been a result of lack of representation, a failure of communication and a general preoccupation with increasingly pressing daily welfare concerns on farm.

Therefore the AASMB appreciates the opportunity to respond at this late stage.

POSITION STATEMENT

1. The AASMB could support Option A converting the proposed national standards into national voluntary guidelines
2. The AASMB cannot support Option B being the proposed national standards as currently drafted
3. The AASMB does not support the variations under Option C

POSITION STATEMENT CONT

The overwhelming desirable outcome of these proposed regulatory practices (Standards) or recommended practices (Guidelines) is to achieve good animal welfare.

Recommendations that are too restrictive or onerous will drive the sheep industry into decline with no improvement to animal welfare being accomplished.

POSITION STATEMENT REASONING

1. The AASMB could support Option A converting the proposed national standards for sheep into national voluntary guidelines on the proviso that the aforementioned guidelines remain unregulated and separate to any legislation for the Prevention of Cruelty to Sheep.
2. The AASMB cannot support Option B being the adoption of the proposed national standards as currently drafted

A fundamental concern of the AASMB is that it is neither convinced nor confident that “Noncompliance with one or more guidelines will not in itself constitute an offence under law.”

The AASMB is unaware of any specialised legal advice confirming this to be the case. In fact it is our belief that once charged under the standard the guideline has legal effect. Further, the document states In May 2009 ministers took the position that, “guidelines regardless of their purpose in existing codes and the new standards and guidelines documents, will not be regulated”. The stated position in 2009 gives the AASMB no confidence that this position will not change at some point in the future.

The AASMB position here is not primarily one of fear of prosecution of its members or their clients per se but that the pursuance of this strategy would prepare a pathway for opponents of agriculture to advance their social / political agendas, wasting valuable community and industry resources with **no benefit to the animal.**

3. The AASMB takes seriously the challenge of removing the surgical procedure known as mulesing from animal husbandry practice. Accelerated Breeding strategies to deliver this outcome have been in place for some time. Such strategies need testing. Producers need the flexibility to deliver best welfare outcomes during this phase. AASMB does not support limiting the procedure on the basis of age
4. The AASMB is of the view that change is more effectively driven through guidance and peer support than regulation.
Regulation provides disincentive for participation.
Producers need the flexibility to deliver best welfare outcomes according to the climatic condition and production system in which the animal is maintained.

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