

6 May 2013

Animal Welfare Standards Public Consultation
Locked Bag 3006
DEAKIN WEST, ACT 2600

Per email: publicconscattle@animalwelfarestandards.net.au

Dear Madam/Sir

Re: Public consultation - personal submission to the Australian Animal Welfare Standards and Guidelines – Sheep (Edition One)

Particularly enforceable Standards that aim to protect the welfare of sheep across jurisdictions are welcome. Supporting Guidelines are also welcome, with the expectation they are promoted throughout Industry and followed.

The following comments are personal and not exhaustive. As an Executive member of Animals Australia (AA), I am aware of AA's commitment to ensuring the best outcome for animal welfare within the Standards and Guidelines process and that AA will submit a comprehensive submission of its own. Beyond my own comments, I support AA's more comprehensive submission and ask that this endorsement be noted.

I also acknowledge the immense commitment and input by many people to produce the draft Standards and Guidelines and their supporting documents, including the R.I.S. and discussion papers.

Introduction

It is explained that Standards “are intended to be *“clear, essential and verifiable statements”*. However, *“not all issues are able to be well defined by scientific research or are able to be quantified.* (p.6 of 39) As in cattle Standards and Guidelines I anticipate that where appropriate science is not available, the standards reflect a value judgment that has to be made for some circumstances.

As stated elsewhere in the Introduction, the welfare of livestock must be the first consideration in the majority of conflicting situations. Where scientific evidence is lacking I trust that the weight of community concerns seeking to raise welfare standards will be taken into account and will contribute to the final value judgment.

In the Purpose of the draft Standards and Guidelines document it is stated: *“All future revisions of Model Codes and ‘Australian Standards and Guidelines’ documents must provide a number of:*

a) clear essential requirements (‘standards’) for animal welfare that can be verified and are transferrable into legislation for effective regulation, ...”

As is conceded, this has not always been achieved. As they stand, Standards are generally vague and unverifiable and more precision is required to achieve the intended outcome of the standards.

General comment

I note the frequent use of the term 'reasonable', together with an explanation in the context of 'reasonable action'. 'Reasonable' is nonetheless a vague and immeasurable term and prone to broad and possibly personal interpretation. It is used throughout and does not instill confidence that responses, carried out in 'reasonable' fashion, will be the best possible for the animal.

Standards are of a general nature, and in many cases it would be hard to measure the extent of actions taken as a consequence i.e. whether in/sufficient and thus necessitating prosecution or otherwise.

I have commented on both Standards and Guidelines, but not all Standards nor all Guidelines. Notwithstanding the non-obligatory nature of Guidelines, I have chosen to comment where I think it apparent comment or simply wording that may assist direction is lacking or is superfluous.

Comment on Standards and Guidelines (order follows those in the draft document)

1. Responsibilities

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

Comment: despite the explanation of 'reasonable action' (p7 of 39) and without firm indication of what constitutes 'reasonable actions' this statement remains vague and unverifiable.

G1.1 Guidelines include the understanding of Standards, which are mandatory, among 'elements of responsibility. Standards must be understood by those responsible for sheep.

Penultimate and final dot points: necessary addition that actions should be taken ' ... **without delay**'

2. Feed and water

S2.1 ' ...must ensure sheep have access to adequate and appropriate feed and water **daily.**' (not 'reasonable')

G2.1 ... Feed and water deprivation exceeding 48 hours **should not occur.**

G2.7 'Access by sheep to contaminated or spoilt feed, toxic plants and harmful substances should be managed or avoided' i.e. suggest deletion of 'if possible'; I believe this to be unnecessary in the context.

3. Risk management of extreme weather etc

Again the three Standards are vague; what constitutes 'reasonable' is open to interpretation

S3.2 A person in charge must ensure the inspection of sheep at pre-determined [or similar] intervals of a frequency and at a level appropriate to the production system and the risks to the welfare of sheep.

G3.1 This section needs a little clarification. Plans to minimise risks to sheep welfare should *include* 'emergency contact details' (which are needed to assist in the case of extremes *etc*) but they should *anticipate* (wording to that effect) the situations then listed

G3.5 ' ... to ensure appropriate treatment **may be given.**'

G3.16 'Where flystrike is a risk, preventative techniques that should be considered are:

selecting **and/or breeding replacement sheep** with greater genetic resistance to flystrike'

I suggest an additional point:

- greater surveillance of flocks, together with -
- tactical crutching/shearing during high prevalence periods
- strategic chemical use
- use of an effective flocks worm control program and/or grazing management to prevent scouring

Mulesing should only be proposed together with use of pain-relief (link to Surgical procedures/mulesing, **7. Mulesing** under)

4. Facilities and equipment

S4.1 A person in charge must take reasonable actions in the construction, maintenance and operation of facilities and equipment to ensure the welfare of sheep

Comment: although realizing the intent of the Standard, the 'reasonableness' of actions is unlikely to be measurable or verifiable

G4.2 Shade in outdoor pens where sheep are penned for any length of time in hot weather should be mandatory, thus a **Standard**

I consider that an additional Standard should require shelter from extreme cold.

At the very least:

- shade should be provided in hot weather for outdoor pens where sheep are penned for any length of time
- shelter from extreme cold/wind should be provided for outdoor pens where sheep are penned for any length of time

5. Handling and husbandry

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

Suggested additions:

- 1) 4) 6) ... in an emergency **with no available alternative** ...
- 3) sheep must not be struck (unreasonable can be broadly and personally interpreted, with varying understanding.)

S5.4 A person must consider the welfare of sheep when using an electric prod, and must not use it: 4) in an unreasonable manner

How does one interpret unreasonable (in an unreasonable manner) use of an electric prod on sheep?

Use of an electric prod on sheep should not be permitted.

Guidelines

G5.5 Sheep should be rested/allowed to slow **and inspected** if they show signs of labored breathing and/or fall behind or away from the mob

G5.19 Care should be taken when shearing and crutching to minimise cuts; **cuts should be treated at the first opportunity and severe cuts treated/stitched, as**

necessary, with the use of pain relief.

6. Tail docking and castration

Standards

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.

S6.2 – S6.4

These procedures should not be performed, at any age, without pain relief.

Guidelines

G6.1 'Tail docking and castration should only be done where there are no alternatives and the procedure results in: benefits to life-time sheep welfare, better flock management, a reduced work (occupational) health and safety risk.

Comment: Consider this should be a **Standard**

7. Mulesing

I consider that a **new Standard** should be introduced to indicate that mulesing must only be considered should a combination of alternative anti-flystrike measures, **as detailed in suggested G3.16 above and similar to the following G7.1** not be effective (and with complementary amendment to this suggested Guideline G3.16, should a new Standard be introduced.)

It is my understanding that clips are neither effective nor efficient as an antidote to flystrike, whereas alternative, developing technologies may have merit.

I also consider that a **new Standard** should be introduced to mandate use of pain relief, should mulesing be undertaken. Costs as per the accompanying R.I.S. should be regained by prominent marketing of 'un-mulesed' product both in Australia and overseas, given the extent of community concern – again, both in Australia and overseas.

Additionally:

S7.1 Mulesing contractors should be trained and accredited

It should be clear that mixed breed sheep bred for their meat, particularly those to be processed as lamb, **should not** be mulesed.

8. Breeding management

Guidelines

G8.1 Consider that it should be mandatory for 'technicians responsible for breeding management [to] have an understanding of reproduction and behavior of both the ewe and the ram' and that this Guidelines should be a **Standard**

G8.7 Predators should be permanently controlled to the extent that this is feasible. At the very least control should continue after lambing.

G8.9 weak/orphaned lambs with little chance of survival should be humanely killed **without delay** (alternatively there may be a possibility for them to be bottle-reared, depending on their health status.)

G8.12 'Technicians conducting artificial insemination, embryo transfer or electro-

ejaculation should be trained and competent in these techniques’
Comment: Consider this should be a **Standard**

G8.14 ‘ Laparoscopic artificial insemination and embryo transfer should be undertaken using sedation, anaesthesia and aseptic technique.’
Suggest this be considered as a **Standard**, given the invasive and specialized nature of the procedures.

9. Intensive sheep production systems

S9.1 Suggest that **adequate** feed and water must be available to intensively produced sheep, thus:

Suggested S9.1 A person in charge must ensure that feed and water is available daily to sheep in intensive production systems, sufficient and appropriate for their daily nutritional needs.

ref S9.7 It should not be permitted to keep fine-wool sheep singly housed. Their pens are barren and many suffer distress and resort to stereotypic behaviour when kept in this way.

G9.11 Appropriate action also must be taken should problems be detected.

G9.14 as above (ref S9.7), should be a **Standard**

G9.15 Such behaviour indicates that the system is at fault. It should not be permitted to keep sheep in conditions that cause animals to engage in the behavior described.

Facilities and environment

Intensive production/housing systems should be well drained. This not mentioned.

Contingency arrangements

G9.30 Fire alarms and adequate fire-fighting equipment should be mandatory, **thus a Standard.**

Glossary

Facilities Facilities should perhaps include sheds i.e. for housed animals?

Intensive production systems - presumably these can be indoor or outdoor and if so, this entry should indicate this is so.

Additional item

Sheep must not be allowed to die from lack of feed or water (or exposure)

The document explains (p.5 of 39):

“Cruelty and unacceptable animal welfare practices can be prosecuted under cruelty and aggravated cruelty offence clauses in animal welfare legislation. For example, **‘sheep must not be allowed to die from lack of feed or water’**.”

I strongly believe that a statement to the above effect should be in the Standards. In extreme drought it is possible that animals will die from lack of feed/water, but this must not happen and should be clearly stated in this document. Intervention **must**

occur to humanely kill animals before they perish. I believe this to be a situation distinct from that where e.g. animals are neglected in peri-urban situations and allowed to die and for which cruelty legislation would normally be applied.

Thank you for the opportunity of contributing to Standards and Guidelines consultation.

Yours sincerely,



Carole de Fraga

Animal Welfare Standards Public Consultation
Locked Bag 3006
DEAKIN WEST, ACT 2600

Per email: publicconssheep@animalwelfarestandards.net.au

Dear Madam/Sir

Re: Public consultation - personal submission to the Australian Animal Welfare Standards and Guidelines – Sheep (Edition One) – supplementary submission

In May 2013 I submitted an initial submission, highlighting what I believed to be some key welfare issues with the advice that my comments were personal and not exhaustive. The information and consideration within the documents provided, as part of the consultation process, is considerable, commendable and helpful.

I have chosen here to add/reinforce a few general comments that nevertheless may assist consideration of the particular. I have also added comment on the adoption of **Variation C** options, which I did not refer to in my previous correspondence.

In providing this additional comment my initial observation remains: Standards proposed are generally vague and unverifiable; more precision is required to achieve the intended outcome of the standards and allow enforcement, i.e. the situation must be measureable against the required Standard.

Notwithstanding the valuable information within the R.I.S. and acknowledging the fact that required Standards and enforcement must be both affordable and effective,

acceptable and appropriate animal welfare should be the goal of the proposed Standards and Guidelines. Ideally, this should result in an absence of pain and suffering for sheep in the field, housed or penned, during reproductive and unavoidable husbandry procedures. Avoidable procedures would include castration of meat lambs, i.e. those to be slaughtered by three months of age, mulesing again of lambs to go to slaughter at an early age – and ultimately mulesing in general.

Animal welfare is of increasing interest and concern to the community. Many people are fundamentally concerned that animals should not suffer, but do not have the opportunity to know what happens to a sheep, be s/he wool-bearing or meat, from lambing to death. Many would be astonished to realize that ranging/paddocked sheep may have no shade or shelter, that lambing mortality can be high – it is hard to find a figure, but up to/around 20% comes to mind – and that husbandry procedures usually occur without pain relief. This lack of knowledge does not lessen public concern for farmed animals. Neither should a possible lack of public knowledge in some areas lessen the need for the highest possible animal welfare standards. Poor welfare generally involves a level of pain and/or suffering. Pain and/or suffering should be prevented for the sake of the animal, not necessarily the community, although community concern is increasingly viewed as a driver of change.

My previous correspondence did not comment on available Options. In this case, perhaps unsurprisingly, I support the adoption of national Standards as proposed, but amended in accordance with additional suggestions received during the consultation process *to render them more effective in terms of welfare outcomes, in conjunction with adoption of Option C variations* as follows:

Variation C1: Use of pain relief for all mulesing

My initial submission dealt with alternatives to mulesing, and suggested a new Standard to indicate that mulesing must only be considered should a combination of alternative anti-flystrike measures prove to, or predictably be ineffective. Should this be the case, mulesing must take place only with the use of pain-relief. There is scope to recoup at least some costs via strategic marketing of a welfare product, domestically but particularly overseas.

Variation C2: Restriction of mulesing age to less than 6 months

Again, taking comments for C1 into account in relation to exploration of alternatives to mulesing before resorting to the procedure, and with the use of mandatory pain-relief, I support restriction of the mulesing age to less than 6 months.

Variation C3: A ban on single penning for wool production

As noted in my earlier submission, single penning of fine-wool sheep should not be permitted. Pens are barren, animals suffer social deprivation and distress and often resort to stereotypic behaviour when kept in this way. There are apparently *no known single pen (fine wool) shed sheep operations left in the country* (R.I.S. p.100) but nevertheless it is wise to legislate against the practice being re-established.

Variation C4: Ban on permanent tethering of sheep

Similar to single penning, sheep – as explained in the R.I.S. – are liable to social deprivation due to lack of interaction with other sheep; this is particularly so as sheep are flock animals and tethering would necessarily prevent their close interaction. Additionally they are likely to be subjected to changes/extremes of weather and possibly absence of grazing material. Thus I support a ban on the permanent tethering of sheep (with the acknowledgment that tethering for a short, defined time may be – on occasion – advisable or required).

Variation C5: Mandating pain relief for laparoscopic LAI and ET

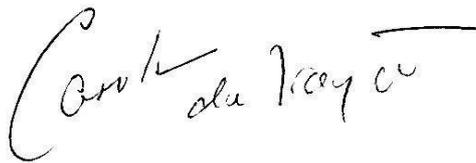
These are very invasive and painful procedures, as is indicated in the R.I.S. (p.100), i.e. the risk is there for sheep to suffer both pain and distress. In my earlier submission I have written, and remain of the view: “**G8.14** ‘Laparoscopic artificial insemination and embryo transfer should be undertaken using sedation, anaesthesia and aseptic technique.’ Suggest this be considered as a **Standard**, given the invasive and specialized nature of the procedures.”

Variation C6: Requiring docked tails to have at least one free palpable joint

I suggest the limit should be at least two palpable tail joints. The Sheep S & G Discussion Paper (January 2013) states there is little difference between a docked tail length of two and three joints but that in a high proportion of merino lambs the tail has been docked too short (for the purposes of the dock) and that short docking leads to health and welfare issues such as rectal prolapse and squamous-cell carcinoma of the vulva. I consider it advisable to stipulate that at least two palpable joints remain.

Thank you for the opportunity of sending additional comment to the Sheep Standards and Guidelines consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Carole de Fraga". The signature is written in a cursive style with a large initial 'C' and a horizontal line at the end.

Carole de Fraga