

Contact details relating to submission:

Dr David Champness, Principal Veterinary Officer (Livestock Management Standards)
Department of Environment and Primary Industries
Private Bag 105, Hamilton VIC 3300
Phone: 03 55730703, Mobile: 0427 730703
Email: david.champness@dpi.vic.gov.au

The Victorian Department of Environment and Primary Industries (DEPI) would like to acknowledge the enormous amount of work that has gone into the drafting of the *Australian Animal Welfare Standards and Guidelines – Sheep* by Animal Health Australia, the Reference and Writing groups and all stakeholders.

DEPI acknowledges the constraints of undertaking a cost–benefit analysis in the development of a consultation Regulatory Impact Statement (RIS) for comparison with the ‘base case’ and the unquantifiable welfare benefits. Another unquantifiable benefit of adoption of these Standards is the associated reduction in risks to the livestock industry and Australia’s reputation.

DEPI generally supports **Option B** in the RIS for the draft *Australian Animal Welfare Standards and Guidelines - Sheep* with the following variations and suggested amendments as indicated in the following submission and table below.

DEPI position on the RIS Variations

C1 - All mulesing with pain relief – DEPI Victoria supports the adoption of alternative strategies for the mitigation of breech flystrike other than mulesing. DEPI supports the phasing out of mulesing whilst acknowledging the adoption of practical and effective alternative strategies may take some time to implement. In the interim, mulesing must only be performed by trained and skilled operators (as per S7.1) and must be conducted with the use of pain relief for sheep older than six months (S7.3). DEPI supports a minor variation of G7.8 “mulesing should be accompanied with pain relief” (removing the wording “where practical and cost effective”). DEPI does **not** support variation C1 (the mandating of pain relief for mulesing for all age groups).

C2 – Restrict mulesing age to less than six months of age. DEPI Victoria does **not** support this variation. There are circumstances such as poor seasonal conditions where lambs may not be in ideal body condition to cope with the stress of mulesing before six months of age, requiring postponement of the operation until seasonal and nutritional circumstances permit.

C3 – Single penning for wool production ban – DEPI Victoria does **not** support the banning of single penning of sheep in shed situations as long as the S9.7 and associated guidelines are retained.

C4 – Tethering ban – There are few sheep which would be permanently tethered in Victoria. Victoria has a Code of Practice for tethering. There is no strong support either way for the banning of tethering. This is a matter that DEPI are comfortable for industry to decide

C5 – Mandate pain relief for Laparoscopic AI & ET – Proposed S8.2 mandates LAI and ET be performed by veterinarians or under their direct supervision. DEPI Victoria supports the use of pain relief for these procedures.

C6 – Require docked tails to have at least one free palpable joint – DEPI Victoria does **not** support this variation. DEPI proposes a combination of two amended standards based on a combination of G6.20 and variation C6.

- S6.3 (a) A person in charge who reasonably expects a lamb to be kept or sold as a *replacement sheep* must ensure the lamb is left with a docked tail stump long enough to cover the vulva in female lambs and be of similar length in males.
- S6.3(b) A person in charge who reasonably expects a lamb to be slaughtered before the age of cutting its two permanent teeth must ensure the lamb is left with a docked tail stump with at least one palpable free joint remaining.

Layout of standards and guidelines document

The current format of the standards and guidelines has sections based on themes with the standards grouped together and the guidelines grouped below sometimes under sub-headings. This formatting has separation of the guidelines which may relate specifically to some standards. For ease of understanding the relationship between standards and guidelines, consideration should be given to having the guidelines which relate directly to a standard/s, placed directly under the relevant standard. This should make for improved understanding of the standards and guidelines. For example, the standard relating to docked tail length (1 or 2? joints) could be directly followed by the guideline recommending the ideal tail length (tip of vulva) to prevent mis-interpretation of the difference between a standard and a guideline. Another example - Mulesing – Std- must use pain relief if > 6 months, followed by G – should use pain relief for all ages.

Introduction

'*Sheep* includes a single ovine animal' is duplicated in the "Introduction" section. It is contained on the Scope on page 5 and repeated in the second last paragraph on "Interpretation" on page 7.

Suggested amendments to the proposed standards and guidelines

Suggested amendments to some of the wording of standards and guidelines in the below table are in red text, with additional suggestions, comment and rationale included in the right hand column.

There are several important issues requiring amendment such as proposed guidelines which in DPI Victoria's opinion must be upgraded to standards to address welfare issues and avoid conflict with current cruelty offence legislation under the Victorian Prevention of Cruelty to Animals Act (POCTA). These comments and suggested are repeated in the below table.

Regarding the standards and guidelines for **feed and water**, DEPI Victoria suggests there is an opportunity to improve these contemporary industry welfare standards by the inclusion of a standard which specifies a minimum mob average body condition score for each class of sheep in a flock. Below these average condition scores would be considered cruelty. See additional comment on G2.9

S2.1 - feed and water standard should be split into separate standards. Daily access to water should be a standard (with exceptions for assembling for husbandry procedures and/or transport. See additional comments for G2.1 in the below table. A maximum time off water standard may apply. This on-farm time should be less than the maximum allowed for transport, but certainly no more.

G3.3 – Part of this guideline **must** be a standard as indicated in the table. Amend to – “A person observing a sheep caught in a structure or bogged must ensure appropriate action is undertaken at the first reasonable opportunity to alleviate the welfare problem”

G3.6 The provision of adequate shelter for sheep and lambs should be a standard. This is a major welfare issue, especially with sudden (and predicted) change from warm/hot weather to cold, wet and windy conditions in Victoria leading to many preventable deaths and suffering. These weather conditions are forecast with alerts issued, so sheep graziers are fore-warned.

G3.7 – The provision of shelter for recently shorn sheep should be a standard (may be incorporated with G3.6 above as a new standard. This is a major and largely preventable welfare issue in Victoria leading to much suffering and many deaths.

G3.14 - Administration of treatments and vaccines should be a standard- must be administered as per manufacturer’s directions, and therefore state Ag & Vet Chemical Control of use legislation and records kept under LPA.

G4.4 “*Facilities should be free from protrusions and obstacles that may cause injury*” should be a standard, otherwise it is in conflict with S4.1 and Land Transport Standard SA3.1(iv).

G5.5 - *During mustering, sheep should be rested or allowed to slow if they show signs of laboured breathing.* This should be a standard (see table below)

G5.7 – “*Overcrowding of sheep in pens or yards should be avoided. Precautions should be taken to prevent smothering, especially for lambs and weaners*”. The first part of this guideline should be a standard - Suggest replace with - “*A person in charge must not overcrowd sheep in a pen, race or yard and must ensure the sheep are freely able to move, turn around and rise from a lying position unobstructed in a pen or yard*”.

G5.17 – Sheep fitted with nets, coats **or a ram harness** should be inspected.... This guideline should be a standard.

G5.19 Shearing cuts – The part of the guideline relating to severe shearing cuts should be a standard – Suggested wording- “A person in charge must ensure the treatment of severe shearing cuts before the sheep leave the yards”.

G5.21 – Sedated rams – this **must** be a standard to protect the rams welfare while under the effects of sedation.

S6.2– *A person must not *tail dock* sheep over six months old unless with *pain relief* and haemorrhage control.*

The pain relief and haemorrhage control must be administered to the sheep, not the operator. Suggest additional “...is administered to the sheep” or alternative wording - *A person in charge must ensure pain relief and haemorrhage control is administered to the sheep when tail docking sheep that are over six months old.*

S6.4 *A person must not *castrate* or use the cryptorchid method on sheep that are more than six months old without administering using *pain relief* and haemorrhage control.* As per S6.2 the pain relief must be administered to the sheep, not the operator. Suggest additional “... to the sheep” or alternative wording - *A person in charge must ensure pain relief and haemorrhage control is administered to the sheep when castrating or using the cryptorchid method on sheep that are over six months old.*

G6.2 – Should be a standard for lambs to be at least 24 hours old before castration and tail docking.

G6.18 The correct temperature for a hot knife used for tail docking should be a standard.

S7.1 The requirement for persons performing mulesing to have the relevant knowledge, experience and skills or supervised by such a person is a reduction from the requirement in the Model Code of Practice for operators to be undertake training and formal accredited process.

S7.3 – As per S6.2 & S6.4, the pain relief & haemorrhage control must be administered to the sheep, not the operator. Suggest new wording - *A person in charge must ensure pain relief and haemorrhage control is administered to a sheep when mulesing a sheep that is over six months old.*

S7.5 – Suggest add “ must not perform a radical mules.

Consider inclusion of the appendix from MCOP describing the mulesing technique.

S8.1 – Suggest an additional standard A person performing artificial breeding techniques must have the relevant knowledge, experience and skills.... etc.

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.* This **must** be a standard. It is in **conflict with S3.3** and cruelty legislation.

G8.9 “Weak or orphaned lambs with little chance of survival ...” should be a standard.

G8.12 – Technicians conducting AI ... This guideline should be captured as a new “competency” standard as per comment for S8.1

9. Intensive sheep production systems –need to stipulate where these standards and guidelines apply to stock containment areas used for feeding sheep during droughts and floods. Containment areas are often used for survival and/or production feeding for greater than 4 weeks.

G9.1 – Daily inspection of the operation of the drinking equipment should be a standard

G9.7 – Should be a standard for minimum body condition score in intensive shed systems

G9.18 - Provision of a hospital pen in an intensive system should be mandatory (a standard).

G9.21 - Reference to Table 9.1 referring to **minimum space allowance** for feedlot or intensive housed sheep should be a standard. These are **minimum** (= standard) space requirements, not recommended (= guideline) space requirements.

G9.23 Maintenance of pen surfaces should be a standard to be consistent with S4.1

G9.27 - Provision of warning and back-up system for controlled ventilation systems in indoor systems should be a standard.

G9.29 – Contingency plans for indoor systems should be a standard

G9.30 – Provision of fire alarms and equipment should be a standard as per the Pig Welfare Standards.

Other general comments on disease prevention and vaccination.

Disease prevention aids in improved welfare and often improved productivity

G6.7 raises concerns, not only in that it mentions specific diseases (the remainder of the document is generic), but what about the diseases that aren't addressed?. Other diseases for which we could make guidelines for include:

- Vaccinations as preventatives:
 - Gudair for ojd, where present on a property (except here in Vic we would argue that is not necessarily appropriate for farms in the NW corner)
 - Scabiguard where scabby mouth exists, and upon entry into confinement feeding situations (is this what is meant by 'biosecurity' at G9.17?)
 - Pulpy kidney vaccination prior to grain feeding
 - Malignant oedema for rams
 - CLA vaccination. CLA is seen as a major welfare issue in Europe where sheep are housed for many months over winter, and develop CLA abscesses about the head and neck after damage from feed stalls.
- Preventing nutritional deficiencies
 - Trace mineral deficiencies
 - Dietary imbalances leading to urinary calculi
 - Grain feeding inducing osteomalacia
- Preventing poisonings
 - Double dose cobalt bullets to prevent phalaris staggers
 - Twist fungus to prevent ARGV
 - Not exposing sheep to toxic plants
 - Monitoring sheep daily upon introduction to a new pasture
- Preventing worms!!!

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

Ref No.	Standard / Guideline	Comment
1. Responsibilities		
S1.1	A person must take reasonable actions to ensure the welfare of sheep under their care	<p>Where is the duty of care in this? This standard should be worded as “A person who is responsible for sheep has a duty of care to ensure the welfare of those sheep” or “A person must ensure the welfare of sheep under their care”.</p> <p>Duty of care includes taking reasonable actions such as those listed in G1.1</p>
G1.1	<p>Elements of responsibility for, and competency in sheep management should include:</p> <ul style="list-style-type: none"> • understanding the standards and guidelines for sheep welfare • knowledge of relevant animal welfare laws • understanding sheep behaviour • planning and undertaking actions for the enterprise to meet the welfare standards and address contingencies that may arise • assessing the quantity, quality and continuity of feed and water supply • maintaining appropriate records • handling to minimise stress, and using handling aids, facilities and other equipment appropriately • undertaking hygienic husbandry procedures in a manner that minimises the risks to sheep welfare • understanding and following chemical and drug treatment instructions for sheep • disease and parasite prevention and control programs • identifying distressed, malnourished, emaciated, weak, injured or diseased 	<p>This is also a list of elements of competency.</p> <p>Suggest add</p> <ul style="list-style-type: none"> • disease and parasite prevention and control programs • “malnourished & emaciated”

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	<p>sheep and taking appropriate action</p> <ul style="list-style-type: none"> • humanely killing sheep by appropriate methods, or seeking the assistance of someone who is capable and equipped to kill them humanely. 	
G1.2	Agistment responsibilities should be communicated, documented and clearly understood by all both parties involved .	All parties rather than only “both” as there may be more than two parties involved (land owner, manager, livestock owner, agents). Ensures capture those responsible for the animals.
G1.3	Owners, managers, and stockpersons of sheep should have an appropriate staff induction program, periodically review existing practices, and be aware of new developments and training relevant to the welfare of sheep .	Additional wording in line with cattle welfare standards
2. Feed And Water		
S2.1	A person in charge must ensure sheep have reasonable access to adequate quantity and quality of appropriate feed and daily access to water sufficient to maintain good health and vigour .	<p>These standards should go further and specify a minimum average body condition score for each class of sheep in the flock. CS1 would be a suitable minimum.</p> <p>S2.1 could be split into separate standards for feed and for water. Suggest include daily access to water. – These standards should have a maximum time off water for on-farm which should be less than then times for allowed during transport, but certainly no more.</p> <p>These are meant to be contemporary industry animal welfare standards</p>
G2.1	Sheep should have access to feed and water daily, except where reasonable management practices, such as shearing, preparation for sale, transport, slaughter and drenching, result in a longer period of water deprivation, to a maximum of 48 hours.	As per comment above, there should be a standard for maximum time off water on-farm. Water deprivation period should not exceed 36 hours, with 48 hours

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	Feed and water deprivation exceeding 48 hours should be avoided.	maximum. These times need to be shorter for lambs and pregnant sheep, especially in hot weather. The Land Transport Standards set maximum limits, so there is no justification to allow TOW beyond 48 hours. As written, one may think they can deprive sheep feed and water for 48 hours before loading for transport.
G2.2	If sufficient feed and water cannot be provided to sheep, options that should be considered are to relocate, agist, sell, or humanely kill the sheep before sheep welfare is adversely affected.	Action must be taken. It is cruelty to do nothing and allow to starve.
G2.3	Weaned lambs should gain weight and be provided with appropriate energy and protein supplements, particularly when grazing dry pastures or stubbles.	Insert “particularly”
G2.4	Lambs should be supplementary fed with ewes (imprint feeding) before weaning where appropriate for the production system, so that the lambs learn to accept supplementary feed.	
G2.5	Regular assessment must should be made of the needs of the sheep in relation to the quantity and quality of feed and water, to ensure adequate supply.	This should be a standard. The “frequency” of assessment will depend on risk. Add the following “.... , to ensure an adequate supply”
G2.6	Self feeders and watering points should be checked regularly and maintained.	
G2.7	Access by sheep to contaminated and spoilt feed, toxic plants and harmful substances should be managed or avoided if possible.	
G2.8	Sheep should be gradually introduced to a change of diet to enable them to adapt and to prevent digestive problems, and should be closely monitored.	
G2.9	A body condition, fat scoring or weighing system should be used as a guide for the monitoring and planned feeding of sheep.	These S&G should include a minimum mob average CS as a standard for different classes of sheep in the flock. CS1 would be a suitable minimum. Also there should be more specific guidance for ideal condition score for the various classes of sheep or at least reference to industry information.

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

G2.10	Sheep should be closely monitored during transition to varying water quality (e.g. mineral content, salinity etc.) to ensure that they are drinking. Alternate water supplies should be provided if sheep are reluctant or not drinking the water due to poor quality observed not to drink.	How long do you observe them before deciding they are not drinking? Suggest replace “observed not to drink” with alternate wording.
3. Risk Management or extreme weather, natural disasters, disease, injury & predation		Should consider inclusion of a guideline for carcase disposal. Although carcase disposal is generally a management issue, it may lead to animal welfare issues if carcasses are left in-situ.
S3.1	A person in charge must have contingency plans and implement them to ensure the welfare of sheep from threats, including *extremes of weather*, *drought*, fires, floods, disease, injury and predation.	Use of the word “contingency plans” activates the advice in the guidelines
S3.2	A person in charge must ensure the *inspection* of sheep at intervals, and at a level appropriate to the production system and the risks to the welfare of sheep.	The definition given is not of ‘Inspection’: inspect The visual check of the health and welfare of sheep on an individual or mob basis. I see the alternate verbs/adjectives are given in respect to ‘lift’: lift (lifted, lifting)
S3.3	A person in charge must ensure appropriate treatment for sick, injured or diseased sheep at the first reasonable opportunity.	This standard is okay, but there are a number of proposed guidelines that have “should” receive treatment etc, which are in conflict with this standard and cruelty legislation. Refer to G3.3, G5.21, G8.5 & G8.9
G3.1	Contingency plans to minimise risks to sheep welfare should include preparation for: <ul style="list-style-type: none"> • emergency contact details • breakdown or mechanical failure affecting feed, water or 	

Draft Australian Animal Welfare Standards and Guidelines – Sheep, Public Consultation version 1.0
DEPI Victoria comments

	<p>ventilation</p> <ul style="list-style-type: none"> • adverse weather - specifically conditions that predispose sheep to heat or cold stress • flood, fire and drought • disease outbreak or injury • other issues specific to the enterprise or sheep being managed. 	
G3.2	<p>Inspection of sheep should take into consideration:</p> <ul style="list-style-type: none"> • feed availability • water supply • age • pregnancy status • weather • disease risk including flystrike • predation risk • recent management procedures. 	
G3.3	<p>Sheep that appear to be isolated from the flock, caught in structures or bogged should be inspected immediately and appropriate action taken.</p> <p>Sheep that appear to be isolated from the flock, observed caught in structures or bogged must should be receive inspected immediately and appropriate action to taken to alleviate the welfare problem</p>	<p>The part relating to sheep observed caught in a structure fence or bogged must be a standard. Suggest new Std - “A person observing a sheep caught in a structure or bogged must ensure appropriate action is undertaken at the first reasonable opportunity to alleviate the welfare problem”</p>

Draft Australian Animal Welfare Standards and Guidelines – Sheep, Public Consultation version 1.0
DEPI Victoria comments

	<i>Std - “A person observing a sheep caught in a structure or bogged must ensure appropriate action is undertaken at the first reasonable opportunity to alleviate the welfare problem”</i>	Sheep appearing isolated should be inspected as per guideline.
G3.4	Drought strategies should be prepared in advance and then progressively implemented. Strategies should be implemented before paddock feed runs out and may include: <ul style="list-style-type: none"> • supplementary feeding and use of stock containment areas • progressive destocking through relocation, sale or agistment • segregation according to risk • early weaning • humane killing. 	Insert “progressive destocking through ...
G3.5	Sheep being fed in a drought situation should be carefully observed and objectively monitored by weighing or condition scoring a sample of sheep from each mob . Weak sheep and shy feeders may require segregation to ensure appropriate treatment.	Add- “... carefully observed and objectively monitored by weighing or condition scoring a sample of sheep from each mob.
G3.6	Sheep and lambs must should be provided with adequate shelter. In the absence of natural protection, consideration should be given to the provision of shade, windbreaks or sheds.	The first part should be a standard. May be combined with G3.7 as a standard.
G3.7	Shorn sheep must should be given protection during cold conditions and sudden weather changes.	Recently shorn sheep must be given protection during cold conditions and sudden weather changes should be a standard- this is a major and largely preventable welfare issue in Victoria leading to much suffering and many deaths.
G3.8	Protection for sheep around shearing may include: <ul style="list-style-type: none"> • postponing shearing 	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	<ul style="list-style-type: none"> • using snow combs • providing shelter • providing wind breaks • providing additional feed. 	
G3.9	Sheep handling should be minimised during extreme weather and in particular during extremely hot weather.	
G3.10	Predator control programs should be implemented where predation is a risk to the welfare of sheep.	
G3.11	Advice on sheep disease prevention or treatment should be sought from qualified advisors. A health management plan should be devised and implemented.	This should be part and parcel of being a competent sheep manager with a duty of care for their flock.
G3.12	Unexplained disease and deaths should be investigated to formulate appropriate remedial and preventative actions.	This is a biosecurity issue and will be captured as a standard in future biosecurity standard. Therefore should be considered as a standard, otherwise will conflict later. Some state livestock disease control legislation mandates reporting of unusual and/or notifiable diseases.
G3.13	Sheep should be vaccinated to protect against relevant preventable diseases.	
G3.14	Treatments and vaccines must should be administered in accordance with the manufacturer's directions. Records of treatments should be kept.	Should be a standard to be consistent with state Ag & Vet Chemical Control of use legislation. Records must be kept under LPA rules. (Note: participation in LPA is voluntary, but all commercial sheep producers must partake in LPA by default in order to sell sheep). Insert “the manufacturer’s” A frequent cause of death of sheep is poor technique in the application of oral drenches, and capsules leading to aspiration pneumonia, throat damage or choking.

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

G3.15	Internal and external parasites should be monitored and controlled.	Consideration should be given as to whether this should be a standard.
G3.16	<p>Where flystrike is a risk, preventative techniques that should be considered include are:</p> <ul style="list-style-type: none"> • selecting replacement sheep with greater genetic resistance to fly strike • culling sheep with high wrinkle scores • culling of previously struck sheep • tactical crutching / shearing during high prevalence periods • strategic chemical use • an effective flock worm control program and/or grazing management to prevent scouring • selecting replacement sheep with correct tail length and / or breech modification • tail docking lambs • use of clips and other appropriate new technologies • mulesing lambs. 	Suggest replace “are” with “include”
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.	
G4.1	<p>Facility construction or modification should take into account the following:</p> <ul style="list-style-type: none"> • sheep behaviour • topography (location and drainage) • flood and fire risk 	Add “ventilation (for sheds and intensive housing systems)”

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	<ul style="list-style-type: none"> • climate • purpose / length of confinement • space • feed and water space requirements • shade / shelter • surface materials • cleaning and waste disposal • ventilation (for sheds and intensive housing systems) 	
G4.2	Shade should be considered in hot weather for outdoor pens where sheep are penned for extended periods.	
G4.3	Floor surfaces should be non-slip, non-abrasive and free draining. Concrete is only recommended for high traffic areas.	
G4.4	Facilities must should be free from protrusions and obstacles that may cause injury.	This should be a standard. Otherwise it is in conflict with S4.1 and also SA3.1(iv) of the <i>Land Transport Stds.</i>
G4.5	Facilities and equipment for restraining sheep should only be used: <ul style="list-style-type: none"> • for the minimum time necessary • with the minimum restraint necessary. 	
5. Handling and husbandry		
S5.1	A person must handle sheep in a reasonable manner and must not: <ol style="list-style-type: none"> 1) *lift* off the ground by one leg, or head, ears, horns, neck, tail or wool, unless in an emergency; or 	Insert "...for the minimum distance..." (consistency)

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	<ul style="list-style-type: none"> 2) throw or drop, except to land on its feet from a height less than one metre; or 3) strike in an unreasonable manner, punch or kick; or 4) drag sheep that are not standing by only one leg, except in an emergency for the minimum distance to allow safe handling, *lifting*, treatment or humane killing; or 5) drag by the ears, tail, or wool; or 6) drag by mechanical means, except in an *emergency* for the minimum distance to allow safe handling, *lifting*, treatment or humane killing. 	
S5.2	A person in charge of a dog that habitually bites sheep must muzzle the dog while working sheep.	
S5.3	A person in charge must ensure a sheep is shorn before the wool reaches 250mm in length.	
S5.4	<p>A person must consider the welfare of sheep when using an electric prodder, and must not use it:</p> <ul style="list-style-type: none"> 1) on genital, anal, udder or facial areas of sheep; or 2) on sheep under three months old; or 3) on sheep that are unable to move away; or 4) in an unreasonable manner on sheep. 	
S5.5	A person must not trim or grind the teeth of sheep.	Already a prohibited procedure under POCTAA in Victoria.

Draft Australian Animal Welfare Standards and Guidelines – Sheep, Public Consultation version 1.0
DEPI Victoria comments

S5.6	A person must not alter the anatomy of the prepuce of sheep by incising the surrounding *skin* (pizzle dropping).	
S5.7	A person in charge must ensure sheep that are tethered are able to exercise daily.	Does this mean free from the tether? Is walking around on a tether deemed “exercise”? If permanent tethering is retained, this standard should be clear as to whether the animal needs to be released from the tether for exercise, free to move around and for how long per day.
G5.1	Sheep should be handled to take advantage of their natural flocking behaviour when mustering, yarding and handling. People handling sheep should have an understanding of the flight zone.	
G5.2	Extra care should be taken when handling sheep with special needs e.g. young lambs, heavily pregnant ewes, lame sheep and rams.	
G5.3	Sheep should be restrained and isolated for the minimum time necessary. Sheep should not be isolated individually in a pen, but should be provided with a pen mate.	Suggest additional wording for clarity
G5.4	The use of dogs and handling aids should be limited to the minimum needed to complete the task.	
G5.5	During mustering, sheep must should be rested or allowed to slow if they show signs of laboured breathing or exhaustion .	This should be a standard.
G5.6	Temporary yards should be used where appropriate for husbandry procedures.	As long as they meet the standards and guidelines in section 4
G5.7	Overcrowding of sheep in pens or yards must should be avoided. Precautions should be taken to prevent smothering, especially for lambs and weaners. <i>Std - A person in charge must not overcrowd sheep in a pen, race or yard and must ensure the sheep are freely able to move, turn around and rise from a lying position unobstructed in a pen or yard.</i>	The first part should be a standard- Suggest replace with - “A person in charge must not overcrowd sheep in a pen, race or yard and must ensure the sheep are freely able to move, turn around and rise from a lying position unobstructed in a pen or yard”.
G5.8	Care should be taken when handling, catching or restraining a segregated sheep, but particularly a ram, because this act may result in serious injury to an animal. Handling	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	practices and facilities should be appropriate to manage these risks.	
G5.9	Sheep should be returned to feed and water as soon as possible after handling.	
G5.10	Unnecessary sheep handling should be avoided during extremes of weather.	Insert ..’s of’...
G5.11	<p>Operators should adopt practices to manage risk from dipping and other forms of ecto-parasite treatments, which include treatment failure, post-dipping infections and injury. When dipping sheep, take into consideration:</p> <ul style="list-style-type: none"> • that adverse weather is not prevailing or predicted • that sheep must should not be overcrowded overloaded in the dip • the use of disinfectant if dipped immediately after shearing. 	<p>The second dot point should be a standard – sheep must not be overcrowded in a dip (& pen, race, yard as per comment for G5.7)</p> <p>‘overcrowded’ rather than “overloaded”</p> <p>It is recommended to allow shearing cuts to heal before dipping (i.e. 4+ days), then still use disinfectant, as cuts may be re-opened during handling.</p>
G5.12	Feet of lame sheep should be inspected and appropriate action taken as necessary.	Suggest re-arrange wording
G5.13	Operators should adopt practices to manage risk from drenching and other forms of oral treatments, which include treatment failure, toxicity, inhalation of the medication and injury. This applies to treatments with solutions, suspensions, pastes, capsules or any form of bolus including bullets.	Refer to comments on G3.14. Trained and skilled operators must be following manufacturer’s directions and this will minimise any risk of toxicity, inhalation and injury etc.
G5.14	Manufacturer’s instructions should be followed for husbandry procedures for sheep such as applying clips and ear tags.	
G5.15	Horn trimming should avoid excessive damage to soft tissue.	Delete ‘excessive’
G5.16	Ear marking, tagging, tattooing and vaccination should be done in a way that minimises the risk of infection and with instruments that are sharp and clean.	Specify the use of disinfectant in dipping (G5.11), why not here, too? Also at G6.5 for tail-docking (in conjunction with other marking procedures in G6.4)
G5.17	Sheep fitted with nets, coats or a ram harness must should be inspected regularly to ensure they do not become tangled, cast or adversely affected by grass seeds.	Include ram harnesses. “Sheep fitted with nets, coats or ram harnesses must ...” Should be a standard.
G5.18	Insect worry should be managed by implementing control measures where appropriate.	

Draft Australian Animal Welfare Standards and Guidelines – Sheep, Public Consultation version 1.0
DEPI Victoria comments

G5.19	Care should be taken when shearing and crutching, to minimise cuts. and severe cuts must should be treated before the sheep leaves the yards. at the first reasonable opportunity <i>Std - “ A person in charge must ensure the treatment of severe shearing cuts before the sheep leave the yards”.</i>	Failure to treat severe cuts / injury is cruelty. The second part of this guideline must be a standard to avoid conflict with s3.3 and POCTA legislation. Suggest Std - “ A person in charge must ensure the treatment of severe shearing cuts before the sheep leave the yards”.
G5.20	When harvesting wool, consider: <ul style="list-style-type: none"> stopping if cold, wet and windy weather is experienced or predicted and adequate shelter is not available releasing newly shorn sheep into adequate shelter or allowing sheep to remain in the shed until the risk has passed ensuring there is adequate feed and water available for newly shorn sheep. 	Refer to comments for G3.6 & G3.7 – there should be a standard for the provision of shelter, especially for recently shorn sheep.
G5.21	Rams that are sedated for shearing or crutching must should be managed to prevent exposure, sunburn and smothering and in accordance with the directions of the prescribing veterinarian	This must be a standard, the rams are sedated and therefore require human intervention to ensure their welfare while under the effect of sedation.
G5.22	Sheep that grow and retain long wool should be shorn annually.	
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 (to perform tail docking or castration)	Suggest add wording - ... to perform tail docking or castration
S6.2	A person must not *tail dock* sheep over six months old unless with *pain relief* and haemorrhage control is administered to the sheep. Alternative wording – see comments to right	Need to stipulate that the pain relief is administered to the sheep, not the person conducting the procedure. The operator could take a panadol tablet in the morning. For legal clarity, suggested addition of “...administered to the sheep” or alternatively -

Draft Australian Animal Welfare Standards and Guidelines – Sheep, Public Consultation version 1.0
DEPI Victoria comments

		<i>A person in charge must ensure pain relief and haemorrhage control is administered to the sheep when tail docking sheep that are over six months old.</i>
S6.3	<p>A person must leave a docked tail stump of a sheep with at least two *palpable free joints* remaining.</p> <p><i>S6.3a - A person in charge who reasonably expects a lamb to be kept or sold as a *replacement sheep* must ensure the lamb is left with a docked tail stump long enough to cover the vulva in female lambs and be of similar length in males.</i></p> <p><i>S6.3b - A person in charge who reasonably expects a lamb to be slaughtered before the age of cutting its two permanent teeth must ensure the lamb is left with a docked tail stump with at least one palpable free joint remaining.</i></p>	DEPI proposes a combination of two amended standards based on a combination of G6.20 and variation C6.
S6.4	<p>A person must not *castrate* or use the cryptorchid method on sheep that are more than six months old without administering using *pain relief* and haemorrhage control to the sheep.</p> <p>Alternative wording – see comments to right</p>	<p>As per comment for S6.1 – Pain relief must be administered to the sheep, not the operator. Suggest additional wording “... administered ... to the sheep” or alternative wording - <i>A person in charge must ensure pain relief and haemorrhage control is administered to the sheep when castrating or using the cryptorchid method on sheep that are over six months old.</i></p>
G6.1	<p>Tail docking and castration should only be done where there are no alternatives and the procedure results in:</p> <ul style="list-style-type: none"> • benefits to life-time sheep welfare • better flock management 	

Draft Australian Animal Welfare Standards and Guidelines – Sheep, Public Consultation version 1.0
DEPI Victoria comments

	<ul style="list-style-type: none"> a reduced work (occupational) health and safety risk. 	
G6.2	Tail docking and castration must not should be done until after a secure maternal bond has been established, and after the lambs are 24 hours old.	This should be a standard. Lambs must be at least 24 hours old.
G6.3	Lambs should be tail docked, castrated or made cryptorchid as young as possible and less than 12 weeks old.	
G6.4	Tail docking, castration and other marking procedures should be planned to with consideration to the age of lambs, weather, staff availability and facilities, including the use of temporary or permanent yards.	
G6.5	Good hygiene practices should be implemented practiced in relation to facilities, hands, handling and instruments. Disinfectant should be used and changed frequently.	Consider making this a standard. ... should be practiced implemented in relation...
G6.6	Infection should be minimised by avoiding operating in muddy or dusty yards and wet or humid weather. The use of portable yards should be considered	... by avoiding operating in muddy ... Include possible use of portable yards?
G6.7	Operators should adopt appropriate strategies to minimise the risk and impact of common infections such as by <i>Erysipelothrix rhusiopathiae</i> and <i>Clostridium tetani</i> through vaccination of lambs and/or their mothers.	Where vaccines are available to prevent diseases of risk at marking time they should be used to appropriately vaccinate the mothers and the lambs.
G6.8	Lambs should be appropriately restrained, in a lamb cradle and, when released should land on their feet to avoid contact of the wound(s) with the ground.	Are lamb cradles less than 1 m off the ground (S5.1(2))?
G6.9	Lambs should be separated from mothers for the shortest possible time.	
G6.10	Haemorrhage should be minimised by selection of method, preventing overheating of lambs and allowing them to settle after mustering.	
G6.11	Tail docking and castration should not be done during extreme weather.	Consider making a standard
G6.12	Tail docking and castration should be done when fly activity is minimal, or in conjunction the risk minimised through the use of with appropriate preventative flystrike treatments.	'or in conjunction with appropriate' or the risk minimised through the use of appropriate

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

G6.13	Sheep should be inspected regularly and with minimal disturbance for signs of post operative complications during the healing process and appropriate action taken.	
G6.14	Tail docking and castration should be accompanied by pain relief when practical and cost effective methods become available . Operators should seek advice on current pain minimisation strategies.	As a guideline, cost effectiveness and practicality is not relevant. Consider changing order of this guideline – move to G6.2.
G6.15	Ewes should be managed to optimise milk production to maximise protein availability for the lamb to aid wound healing.	
G6.16	After placement in paddocks, lambs should not be forcibly mustered and yarded until wounds are healed.	
G6.17	Lambs should be tail docked by the hot knife or rubber ring methods, in preference to the sharp knife method or other cutting methods except for larger tails. The hot knife method is generally preferable for tail docking done with mulesing. Recommendations may change with future research and development.	G6.10 refers generically to ‘selection of method’ – why not define it there?
G6.18	A hot knife must should be operated at the recommended temperature	Should be a standard
G6.19	The tail should be docked through the joint space.	
G6.20	Replacement sheep - The docked tail must should be long enough to cover the vulva in female lambs and be of similar length in males.	Refer to comments on S6.3. G6.2 should be the standard for sheep kept as replacements.
G6.21	Tail docking should not be done for cosmetic reasons or on fat tail sheep breeds.	
G6.22	Lambs destined for slaughter before 12 weeks old, or the onset of puberty, should not be castrated.	
7. Mulesing		
S7.1	A person performing* mulesing* 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 (to perform mulesing).	The MCOP states operators must be accredited. This standard is a reduction in the existing requirement for a formal accreditation process.
S7.2	A person must not *mules* sheep that are less than 24 hours old or more than 12	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	months old.	
S7.3	A person must not *mules* sheep six months to 12 months old without the administration of unless with *pain relief* to the sheep.	<p>As per comment on S6.1 & S6.4, the pain relief and haemorrhage control must be administered to the sheep, not the operator. Suggest additional wording as indicated or new wording below.</p> <p><i>A person in charge must ensure pain relief and haemorrhage control is administered to a sheep when mulesing a sheep that is over six months old.</i></p> <p>DEPI supports the guideline that pain relief should be used for all mulesing, but does not support the RIS variation C1 (the mandating of pain relief for all age groups)</p>
S7.4	A person must not *mules* sheep showing signs of debilitating disease, weakness or ill-thrift.	
S7.5	A person *mulesing* sheep must not perform a radical mules operation and only remove wool bearing skin.	<p>Additional wording “... must not perform a radical mules operation and” Radical mules is currently banned in the COP. Definition may require wording to better define technique, eg “modified mules” vs “radical mules”. The COP has an appendix (Mulesing Procedures) with the technique etc which could be included.</p>
G7.1	<p>The options for breech strike prevention should be considered before undertaking mulesing including:</p> <ul style="list-style-type: none"> • selection for resistant conformation • culling susceptible sheep • clips 	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	<ul style="list-style-type: none"> • crutching • timing of shearing • chemicals for flystrike prevention • internal parasite control. 	
G7.2	Selection for breech flystrike-resistant conformation should include low dag score, low wrinkle score and low breech cover score.	
G7.3	In areas prone to high breech flystrike risk, lambs with high dag score and/or high wrinkle score should be culled.	
G7.4	<p>In assessing breech flystrike risk and the need for mulesing, factors that should be considered are:</p> <ul style="list-style-type: none"> • sheep are at a high risk of breech fly-strike on the property on which they are farmed • the lambs are intended to be kept as adult sheep • sheep are likely to be sold and kept as adults in areas prone to breech flystrike. 	
G7.5	The mulesing operation should only remove sufficient wool-bearing skin appropriate to the conformation of the lamb being treated to achieve fly strike protection.	<p>See comment for S7.5 “must not perform a radical mules”.</p> <p>Consider inclusion of wording from COP on technique</p>
G7.6	Where mulesing is performed, lambs should be mulesed at an age from 2 – 12 weeks of age.	
G7.7	<p>Mulesing should only be done where there are no alternatives and the procedure results in:</p> <ul style="list-style-type: none"> • benefits to life-time sheep welfare • better flock management 	This guideline should be moved up in order to the second guideline in this section.

Draft Australian Animal Welfare Standards and Guidelines – Sheep, Public Consultation version 1.0
DEPI Victoria comments

	<ul style="list-style-type: none"> a reduced work (occupational) health and safety risk. 	
G7.8	Mulesing should be accompanied by pain relief where practical and cost effective methods are available . Operators should seek advice on current pain minimisation strategies.	‘Cost effective methods’ is not relevant here as a guideline. If this guideline is not adopted as a standard (variation C1) then remove “cost effective & practical”.
G7.9	Good hygiene should be practiced implemented in relation to facilities, hands, handling and instruments. Disinfectant should be used and changed frequently.	... should be practiced implemented in relation...
G7.10	Risk of infection should be minimised by avoiding operating in muddy or dusty yards and wet or humid weather.	... by avoiding operating in muddy ...
G7.11	Operators should adopt appropriate strategies to minimise the risk and impact of common infections such as by <i>Erysipelothrix rhusiopathiae</i> and <i>Clostridium tetani</i> through vaccination of lambs and/or their mothers.	Consider being less specific as to the diseases, i.e. Where appropriate vaccinations and other preventative measures exist for common infectious associated with marking sheep should be appropriately protected. Or as suggested at G6.7?
G7.12	Lambs should be appropriately restrained, in a lamb cradle and when released should land on their feet to avoid contact of the wound(s) with the ground.	As per comment for G6.8 in relation to S5.1(2) Are lamb cradles less than 1 m off the ground (S5.1(2))?
G7.13	Lambs should be separated from mothers for the shortest possible time.	
G7.14	Ewes should be managed to optimise milk production to maximize protein availability for the lamb to aid wound healing.	
G7.15	Haemorrhage should be minimised by preventing overheating of lambs and allowing them to settle after mustering.	
G7.16	Mulesing should be done when fly activity is minimal, or in conjunction with appropriate preventative flystrike treatment.	See G6.12 re fly protection. Given need for a prolonged period without mustering, an long-acting product could be specified.
G7.17	Sheep should be inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken.	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

G7.18	After placement in paddocks, lambs should not be forcibly mustered and yarded until wounds are healed.	
G7.19	Mulesing should be planned to consideration to the age of lambs, weather, staff availability and facilities, including the use of temporary or permanent yards.	
G7.20	Mulesing should not be undertaken during extreme weather.	
8. Breeding management		
S8.1	A person performing artificial breeding procedures on sheep must not cause unreasonable pain, distress or injury to sheep.	Suggest a new additional Standard to cover competency for persons performing artificial breeding techniques (also captures G8.12) <i>A person must performing artificial breeding techniques must have the relevant knowledge, skills & experience etc.</i>
S8.2	A person must be a veterinarian, or operating under veterinary *supervision*, to perform surgical embryo transfer and laparoscopic insemination of sheep.	
G8.1	Technicians responsible for breeding management should have an understanding of reproduction and behaviour of both the ewe and the ram.	“Technicians” ? replace with “people” or “those” ?
G8.2	The timing and duration of the joining period should be managed to align with feed availability for the ewes and lambs, and to reduce weather risk for lambs.	
G8.3	In the last 4-6 weeks of pregnancy, management practices should minimise stress on ewes to reduce pregnancy toxemia and other metabolic diseases.	... to minimise the risk of pregnancy tox....
G8.4	Lambing ewes should be monitored, and disturbed as little as possible.	The lack of disturbing disturbs me! Many farmers can spend all day in the paddocks with lambing ewes without disturbing them unduly as they monitor and assist lambing. How do you deal with G8.5 without disturbing?
G8.5	Ewes that receive severe injuries during lambing or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove lamb) must should receive urgent treatment or be humanely killed without delay.	This must be a standard or delete as a guideline as the issue is captured in S3.3. It is in conflict with POCTA legislation and is a cruelty offence not to alleviate the welfare issue.

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

G8.6	Lambing ewes should be placed in a sheltered paddock with quality feed, especially if there is a risk of cold, wet or windy weather.	The provision of feed is captured in S2.1 The guideline could include recommended feed levels from Prograze / Evergraze info, eg 1500 kgDM/Ha for single bearing ewes etc. The shelter provision is captured in G3.6 & G3.7 which should be combined as a standard .
G8.7	Predators should be controlled before and during lambing.	
G8.8	Newborn lambs orphaned at birth should receive colostrum or colostrum substitute as soon as possible after birth.	
G8.9	Weak or orphan lambs with very little chance of survival must should be humanely killed at the first reasonable opportunity.	This must be a standard, otherwise in conflict with S3.3
G8.10	Rams should be checked at regular intervals for injuries and disease.	
G8.11	Ewes should be handled and restrained for the shortest duration and as gently as possible. Ewes should spend the minimum amount of time inverted.	
G8.12	Technicians conducting artificial insemination, embryo transfer or electro ejaculation of sheep must should be trained and competent in these techniques	Should be a Standard as per comment for S8.1 – have the relevant knowledge skills & experience....
G8.13	Semen collection using an artificial vagina should be used in preference to electro ejaculation.	
G8.14	Laparoscopic artificial insemination and embryo transfer should be done using sedation, analgesia and aseptic technique.	Support variation C6 as the standard
9. Intensive sheep production systems		Does this section include containment areas used for drought / flood feeding? Need to clarify. May only be feeding every 2 days in drought containment feeding area.

Draft Australian Animal Welfare Standards and Guidelines – Sheep, Public Consultation version 1.0
DEPI Victoria comments

S9.1	A person in charge must ensure that feed and water is available daily and easily accessible to sheep in *intensive production systems.	Feed and water needs to be easily accessible
S9.2	A person in charge must ensure the *inspection* of sheep daily in the first week of confinement to ensure adaptation to the *intensive production system*.	
S9.3	A person in charge must take reasonable action where sheep have not adapted to an *intensive production system*	Sheep that do not adapt to intensive confinement must be removed from the system.
S9.4	A person in charge must not allow faeces and urine to accumulate to the stage that compromises the welfare of sheep in an *intensive production system*	
S9.5	A person in charge must ensure an indoor housing system for sheep has effective *ventilation*.	
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*	Refer to comments for G9.21 - Table 9.1 should be a standard mandating minimum space allowances.
S9.7	A person in charge must ensure a sheep housed in a single pen for fine wool production is able to turn around, and to see, hear, smell, and touch neighbouring sheep.	
G9.1	Drinking equipment must should be inspected daily regularly and maintained to ensure its correct operation and that pipes, taps, and ball valves are not blocked.	Should be a standard for intensive systems. It is a standard in the Pig Welfare Standards (pig code). '..its correct operation and that pipes, taps, and ball valves are not blocked. '
G9.2	Water troughs should be cleaned as required to prevent contamination.	
G9.3	Feed troughs should be cleaned as required to prevent faecal contamination and build up of stale or spoiled feed and dust.	
G9.4	Trough space should be adequate for the feeding system to allow the daily intake of feed and water, and to minimise bullying and shy feeders.	Consideration as a standard
G9.5	Sheep should be gradually introduced to a change of diet to enable them to adapt and to prevent digestive problems, and should be closely monitored.	
G9.6	Sufficient fibre should be provided in the diet to promote rumination.	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

G9.7	Sheep for intensive wool production systems must should be maintained at or above a body condition score or fat score of two out of five (five is fattest).	Should be a standard (as per Pig Welfare Stds). Should include body / fat condition score system in the definitions
G9.8	Managers of intensive systems should be aware of current information in intensive sheep management and health, and have contact with professionals with relevant expertise.	
G9.9	When inspecting sheep in the first week of confinement, particular attention should be given to their adjustment to: <ul style="list-style-type: none"> • new dietary regime • environment • feeding and watering facilities • other sheep. 	
G9.10	Sheep should be grouped with others that they are already familiar with, and of the same class.	
G9.11	During inspections particular attention should be given to: <ul style="list-style-type: none"> • identifying signs of sickness, digestive conditions or injury • measuring feed intake • checking feed and water facilities • identifying shy feeders • identifying stereotypic behaviours early, such as repetitive motion, wool biting 	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

	and mounting railings.	
G9.12	<p>Special attention should be given to shy feeders. Management options for shy feeders may include:</p> <ul style="list-style-type: none"> • reducing pen density • drafting sheep into pens based on size of sheep • altering trough design to enhance feed access • removing them from the system. 	
G9.13	Lighting in indoor systems should be adequate to allow inspection of all sheep.	This is a standard in the Pig Welfare Stds
G9.14	Sheep should not be housed in single pens.	
G9.15	<p>Wool biting and other stereotypic behaviours must should be addressed. Options may include:</p> <ul style="list-style-type: none"> • providing coarse fibre (e.g. straw) in such a way that satisfies the need for sheep to forage and ruminate • correcting dietary deficiencies • enriching the environmental • removing the sheep from the system. 	This should be a standard. Behavioural problems indicate welfare issues and thus should be addressed.
G9.16	Prior to entry into an intensive system, sheep should be inspected for disease and injury and appropriate treatment undertaken.	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

G9.17	A biosecurity and disease prevention plan should be in place for the introduction of sheep to the system.	
G9.18	Intensive systems must should have hospital pens for sick or injured sheep.	Should be a standard
G9.19	Dead sheep should be removed as soon as possible.	
G9.20	When determining space allowance per sheep, consideration should be given to: <ul style="list-style-type: none"> • environment • group size • age • sex • live weight • provision of feed and water • behaviour of stock. 	S9.6 sets the minimum, irrespective of any of these admirable considerations!
G9.21	Table 9.1 must should be used as a guide for the minimum space allowances per sheep in a pen or feedlot.	Table 9.1 should be referenced in a standard as the minimum space allowances
G9.22	Dust should be minimised within the intensive system.	
G9.23	Pen surfaces must should be maintained to minimise slipping and injury.	Should be a standard to be consistent with S4.1
G9.24	Pen surfaces should be constructed and maintained in a way that reduces the build up of manure and urine.	
G9.25	Shade and shelter should be provided to prevent heat and cold stress if heat or cold stress symptoms are apparent. ??	This should be captured by a general standard for provision of shelter- refer to comments on G3.6 & G3.7.
G9.26	All ventilation equipment should be checked regularly to ensure it is fully operational.	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

G9.27	Indoor housing systems with controlled or forced ventilation that rely on automatic equipment must should be inspected daily or have a back-up system to warn of mechanical failure.	This should be a standard as per the Pig Welfare Stds. Require both a warning and a back-up system; the back-up doesn't warn...
G9.28	Natural or artificial light should be adequate for all sheep housed in indoor systems.	Should be a standard as per Pig Welfare Stds
G9.29	A contingency plan must should be in place for the following: <ul style="list-style-type: none"> • water supply interruption • feed supply interruption • disease outbreak • extreme weather conditions (heat and cold stress) • personal accident or injury • fire or flood. 	Should be a standard
G9.30	Fire alarms and adequate fire fighting equipment must should be fitted and maintained in all indoor housing systems.	This should be a standard as per the Pig Welfare Stds.
10. Humane killing		
S10.1	A person in charge must ensure killing methods for sheep result in rapid loss of consciousness followed by death while unconscious.	
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 and skills, unless: <ol style="list-style-type: none"> 1. the sheep is suffering and needs to be killed to prevent undue suffering; and 2. there is an unreasonable delay until direct supervision by a person who has the relevant knowledge, experience and skills is available. 	

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

S10.3	A person in charge of a sheep suffering from severe distress, disease or injury that cannot be reasonably treated, must ensure the sheep is killed at the first reasonable opportunity.	
S10.4	A person killing sheep must take reasonable action to confirm the sheep is dead.	
S10.5	A person killing a lamb by a blow to the forehead must ensure the lamb weighs less than 10 kilograms.	Suggest reword - <i>Blunt trauma can only be used on a lamb weighing less than 10 kg and a person must induce unconsciousness with a single blow to the forehead.</i>
S10.6	A person must only use *bleeding-out* by neck cut to kill a conscious sheep where there is no firearm, captive bolt or lethal injection reasonably available and the killing is in the welfare interest of the sheep.	As per previous draft version, include – “... is in the welfare interest of the sheep.” This standard needs to link to the welfare of the sheep, otherwise to easy to circumvent.
G10.1	The poll method is the preferred method for sheep. (see Figure10.1)	So, label the diagram with poll method as ‘A’. Words here to say the frontal method is an alternative, but harder to apply accurately. Pay attention to similar wording in Fig 10.1
Fig 10.1	Notes: 1. Close-range firearm use is recommended to be applied to the frontal or poll positions of the head of sheep. (A) indicates the frontal method and (B) indicates the poll method. The dots indicate the point of aim and the arrows indicates the direction of aim for the positions. For the frontal method, the firearm or captive bolt should be directed at a point midway across the forehead and where two lines from the topside of the base of the ears and top of the eyes intersect. For the poll method, sheep are shot through the skull just behind the base of the horns. The line of fire should be directed slightly forward of the angle of the jaw of the sheep, depending on the point of impact. For blunt trauma use position A	Figure 10.1 changes (mainly in the sequence): 1. Close-range firearm use is recommended to be applied to the frontal or poll positions of the head of sheep. (A) indicates the poll method and (B) indicates the alternative frontal method. The dots indicate the point of aim and the arrows indicate the direction of aim for the positions. (A) For the poll method, sheep are shot through the skull just behind the base of the horns, aiming between the jaws . The line of fire should be directed slightly forward of the angle of the jaw of the sheep, depending on the point of impact. (B) For the frontal method, the firearm or captive bolt should be directed at a point midway across the forehead and where two lines from the topside of the base of the ears and top of the eyes intersect. For blunt trauma use position B Technically, as the figure is labelled Recommended position and direction of fire for humane killing of sheep

Draft *Australian Animal Welfare Standards and Guidelines – Sheep*, Public Consultation version 1.0
DEPI Victoria comments

		Then there should be no mention of ‘blunt trauma’ in the Notes
G10.2	<p>Three or more signs should be observed to determine whether the method used for humane killing has caused death.</p> <p>Note: Signs of death include:</p> <ul style="list-style-type: none"> • loss of consciousness and deliberate movement • absence of corneal ‘blink’ reflex when the eyeball is touched or maximum dilation of the pupil • absence of rhythmic respiratory movements for at least three minutes • absence of heartbeat after three minutes • absence of a pulse after three minutes. 	
G10.3	A single, sharp blow should be delivered to the centre of the forehead.	This should be part of S10.5 .
G10.4	Bleeding-out of sheep without pre-stunning using the neck cut should only be done as a last resort using a suitable, sharp knife. The cut should transect both the carotid arteries and both the jugular veins.	This should be part of S10.6
	In Scope on page 5:	Duplicated in ‘Sheep’ includes a single ovine animal.