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Animal Welfare Standards Public Consultation

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### **Australian Animal Welfare Standards and Guidelines for Sheep Public Consultation**

In response to the invitation for public comment on the draft Australian Animal Welfare Standards and Guidelines for Sheep, attached for consideration are comments from the Tasmanian Department of Primary Industries, Parks, Water and Environment.

In general, the Department supports the proposed standards and guidelines. In addition to providing general comments on the standards, specific comment has been provided in relation to:

- draft standards for which existing Tasmanian legislation imposes a higher standard; and
- suggested amendments to the draft standards

Thank you for the opportunity to comment.



Lloyd Klumpp

**GENERAL MANAGER**

**BIOSECURITY AND PRODUCT INTEGRITY DIVISION**

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# Australian Animal Welfare Standards and Guidelines for Sheep Public Consultation

## General Comments

The standards are drafted so as to be readily understood by those with responsibility for the welfare of sheep. This approach is supported as it promotes compliance and positive outcomes in terms of animal welfare. A consequence of this approach, however, is that substantial rewording is likely to occur during legislative drafting to ensure that the regulations prescribing the standards are unambiguous and enforceable.

It is also noted that a number of the standards articulate existing requirements imposed by the *Animal Welfare Act 1993* (Tas).

## Current requirements under Tasmanian legislation in relation to draft standards

Higher standards or more specific requirements imposed by existing Tasmanian legislation are noted in relation to the following draft standards:

### **S2.1 A person in charge must ensure sheep have reasonable access to adequate and appropriate feed and water.**

Section 8 of the *Animal Welfare Act 1993* (Tas) requires that:

- food of sufficient quality is provided:
  - in sufficient quantity to meet the nutritional requirements of maintaining the animal in reasonable body condition and, if appropriate, allowing for growth and reproduction: and
  - as often as appropriate for the digestive system and metabolism of the animal.
- Fluids of sufficient quality are provided in sufficient quantity to keep the animal hydrated at all times.

### **Standards in section 6 – tail docking and castration**

Under the Tasmanian Veterinary Surgeons Regulations, tail docking and castration of sheep over six months of age may only be performed by a registered veterinary surgeon or a veterinary student under the direct supervision of a registered veterinary surgeon.

### **Standards in section 7 - mulesing**

Under the Tasmanian Veterinary Surgeons Regulations, mulesing of sheep over six months of age may only be performed by a registered veterinary surgeon or a veterinary student under the direct supervision of a registered veterinary surgeon.

### **S8.2 A person must be a veterinarian, or operating under veterinary supervision, to perform surgical embryo transfer and laparoscopic insemination of sheep.**

Under the *Veterinary Surgeons Act 1985* (Tas), the procedures described in this standard may only be performed by a registered veterinary surgeon or a veterinary student under the direct supervision of a registered veterinary surgeon.

## **Suggested amendments to draft standards**

**S5.7** *A person in charge must ensure that tethered sheep are able to exercise daily.*

This standard should additionally specify that tethered sheep must be inspected daily.

**S6.3** *A person must leave a docked tail stump of a sheep with at least two palpable free joints remaining.*

This standard should additionally require that the docked tail stump of female sheep covers the vulva.

**S10.5** *A person killing a lamb by a blow to the forehead must ensure that the lamb weighs less than 10kg.*

This method of killing is unlikely to deliver acceptable animal welfare outcomes for larger lambs unless they are immobile or moribund. It is recommended that this standard is amended to provide that a person killing a lamb by a blow to the forehead must ensure that the lamb weighs no more than 5kg OR if it is moribund or immobile, no more than 10kg. It is also recommended that the standard is amended to require that if the lamb is greater than 5kg, it must be bled out following the blunt trauma and loss of consciousness.