

### **Edgar's Mission's submission to the public consultation on the Australian Animal Welfare Standards and Guidelines – Sheep (Edition One)**

As a member society of Animals Australia, Edgar's Mission endorses Animals Australia's submission with the exception of their recommendation regarding S3.2 at the end of this submission. Firstly we would like to make the following points:

- The draft standards and guidelines maintain the current unacceptable status quo in regard to welfare standards for sheep kept commercially in Australia.
- There is a disregard for the sound scientific evidence and obviously painful and cruel practices documented in the Discussion Papers.
- The process accepts industry arguments that change is not possible or affordable.
- Many of the Standards include subjective words rather than enforceable minimums.
- There are only a relatively small number of mandatory increments – primarily bans on practices which in almost all cases the RIS makes it clear that these practices (intended to be banned or limited) are rare and are described as defensive standards eg a ban on pizzle dropping, teeth grinding and (and an Option) the single penning (for fine wool) – none of which are now said to occur, and thus will not 'cost' the industry anything in regard to adjustment costs.
- In contrast, a vast number of unacceptable painful practices will remain, particularly mulesing, castration, tail docking and laparoscopic insemination, and they will largely not require pain relief at the age these surgical mutilations usually occur i.e. no actual change for most animals.
- Management practices (that are aversive or cause stress and pain) that have clear alternatives will continue to be allowed. Examples include electric prods, electro-ejaculation, and the unnecessary castration of lambs that will be sold for meat before 12 weeks of age (i.e. before maturity).
- Similarly, key issues such as enforcement of access to food and water, provision of shade and shelter, and adequate inspection so that health and welfare issues can be dealt with promptly as they arise (and thus reduce suffering) have not been effectively addressed by this draft.
- We have no confidence that there will be inspection or enforcement of these new Standards and thus any clear increment over the current (unacceptable) level of compliance activity. These same issues, inexact language and inability to enforce welfare measures, is the very issue flagged as the problem with the Model Codes which these Standards were said to be able to address.

- We support a number of increments, statements of practices that are no longer to be legally permitted, including that a person in charge of sheep must not: use an electric prod on lambs less than three months old (as is the case in some States), trim or grind the teeth of sheep (though rarely if ever now done) or alter the anatomy of the prepuce of sheep by incising the surrounding skin - pizzelle dropping (though rarely if ever done now).
- We also strongly welcome the Standard that will mean the conscious 'bleed out' method of killing sheep (on farm) will only be permitted if another method (lethal injection, firearm or captive bolt) is not 'reasonably available'. Some other increments would also be realised if Option C points were adopted.
- The draft Standards allow for a reduction in current standards. For example -
  - Whilst Edgar's Mission opposes mulesing the draft Standards suggest the removal of the need for training and accreditation for those performing mulesing - an extremely painful and invasive procedure.
  - The RIS envisages Victoria may opt to reduce its current requirement for veterinary supervision, in favour of cheaper accredited contractors, when administering pain relief for castration of sheep over 6 months of age (pain relief is still not to be used for younger lambs).
- With the identified market failures' in regards to animal welfare in the sheep industry and its inherent inability to quantify the costs associated with poor animal welfare outcomes the precautionary principle should be applied, that is, doubt creates an obligation to act to prevent possible harm, not an excuse to accept the status quo. As a minimum, all variations under Option C (with the exception of Variation C6) should be imposed.

While we support many of the views expressed by Animals Australia in relation to S3.2 we do not endorse their recommendation in full and submit our recommendation below.

#### Inspection of sheep

- Like Animals Australia we believe Standard S3.2 is inadequate as it provides no specific inspection regime. Sheep can be injured, ill, entrapped, fly struck or subject to predation and should be assisted as quickly as possible. We share Animals Australia's strong view that all animals should be inspected daily (to reduce the time any risks are addressed and suffering alleviated) so **do not** endorse their recommendation: A person in charge must ensure the \*inspection\* of sheep at least every second day, or more frequent intervals at a level appropriate to the production system and the risks to the welfare of the sheep.
- Instead **we recommend**: S3.2 A person in charge must ensure the \*inspection\* of sheep at least daily.

*Submitted by email: publicconssheep@animalwelfarestandards.net.au*