



Hon John McVeigh MP
Minister for Agriculture, Fisheries and Forestry

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Animal Health Australia

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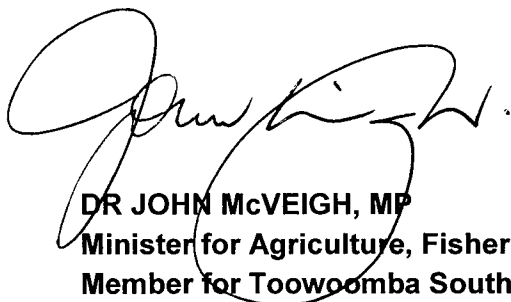
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I refer to the letter of 8 March 2013, from Dr Mike Bond, Chief Executive Officer, Animal Health Australia (AHA), inviting participation in the public consultation on the proposed draft Australian Animal Welfare Standards and Guidelines for Sheep. Please find attached the Department of Agriculture, Fisheries and Forestry's (DAFF) comments on the draft standards and guidelines and associated Regulatory Impact Statement.

I acknowledge the work AHA has done in leading the development of this important initiative and thank AHA for the opportunity to contribute to the development process through member participation in the Stakeholder Reference Group meetings.

If you require any further information regarding this matter, please contact Mr Ian Rodger, Senior Policy Officer, of DAFF on telephone 07 5453 5825 or email ian.rodger@daff.qld.gov.au.

Yours sincerely



DR JOHN McVEIGH, MP
Minister for Agriculture, Fisheries and Forestry
Member for Toowoomba South

Att

Comments on: Proposed Australian Animal Welfare Standards - Sheep

General Comments

1. In general it is difficult to make a welfare benefit/cost comparison on the proposed standards as the document focuses mainly on costs of implementation of each proposed standard. An attempt needs to be made to cost the potential benefits ie. cost savings in retaining markets, or the cost savings due to increase productivity brought about by implementing a standard.

The welfare benefit versus cost needs to be clearly stated to allow a true benefit/cost analysis to be made.
2. In assessing the criteria for comparing the net compliance costs to industry and government, there should be a clearer identification of the cost to government. The identified costs appear to be mostly industry based implementation costs. The cost to government to regulate standards needs to be clearly set out.
3. The tables should have some keys and explanations of symbols and derivations of discount rates etc: to inform readers.
4. The document compares Options (C1-6) against each other in terms of welfare benefits. Each option needs to be considered on its merit and compared to either the base case or the standard under Option B. For example comparing pain relief against tethering is inconsequential against the welfare benefits of pain relief.

SHEEP Standards and Guidelines specific comments

General comments

Queensland DAFF supports the Standards and Guidelines as written (Option B in the Regulatory Impact Statement).

Queensland DAFF offers the following comments on the standards and the Regulatory Impact Statements (RIS) and in relation to the Options under consideration:

Proposed standard S5.7 - Exercise of tethered sheep

Letting tethered sheep off to walk around as exercise should be a NIL cost.

This standard would have little impact on commercial production.

Persons wanting to keep companion/pet sheep should be aware of and be obligated to fence the paddock or exercise the animal as part of their duty of care.

As a principle permanent tethering of sheep in Queensland is not support.

**DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY
(Queensland)**

Proposed standard 6.3 – Requirement for two free palpable joints in tails – reduction in regulatory burden

Queensland supports the requirement for a minimum 2 palpable free joints. The RIS states that science supports 3 joints as a minimum to provide necessary protections (from sunburn/cancer and to facilitate protection from fly worry), however, the proposed requirement of 2 joints is considered acceptable from a production, regulatory and animal welfare viewpoint.

Comments on Options C1 – C6

Variation C1 - A3.1 Incremental cost of pain relief for all mulesing

Mulesing is known to reduce the amount of chemical applications for fly control required. The reduction in chemical costs compared with the one-off pain relief treatment must be considered. The calculations also do not appear to take into consideration production losses due to fly strike, the cost savings in chemical applications, or the welfare benefits/impacts to the sheep.

The calculation also does not take into account production losses (reduced growth rates) in mulesing sheep intended as fat lambs.

Mulesing is a major market access issue and market forces should dictate the requirements for mulesing of sheep.

Variation C3 - A3.3 Unquantifiable incremental cost of banning single penning for wool production

According to the RIS this is not current practice anywhere in Australia. The banning of singly housed sheep for fine wool production or for any other purpose on grounds of high animal welfare impact for this species is supported.

Variation C4 - A3.4 Incremental cost of banning sheep tethering

The banning of permanent tethering of sheep is supported on the grounds that it is not common commercial practice but has a significant animal welfare risk. Sheep kept as pets should be afforded the minimum applicable standards acceptable by jurisdictional legislation.

Variation C5 - A3.5 Incremental cost of mandating pain relief for laparoscopic LAI and ET

Laparoscopic artificial insemination and embryo transfer are acts of veterinary science in Queensland and as such can only be performed by a veterinary surgeon. Veterinary surgeons have ready access to effective pain relief.

The procedure is invasive and likely to cause significant pain and on these grounds the use of appropriate pain management is supported.

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(Queensland)

Variation C6 - A3.6 Incremental cost of requiring docked tails to have at least one free palpable joint

The tail should cover the vulva for sheep intended for breeding. The risks for breeders are sunburn and subsequent squamous carcinomas and risk of fly strike due to the inability to keep flies away from the vulva.

On these grounds a return to one free palpable joint is not supported.