



**Australian Animal Welfare Standards and Guidelines for Sheep
Public Consultation
May 2013**

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NSW Farmers' Association Background

The NSW Farmers' Association (NSW Farmers) is Australia's largest State farmer organisation representing the interests of its farmer members – ranging from broad acre, livestock, wool and grain producers, to more specialised producers in the horticulture, dairy, egg, poultry, pork, oyster and goat industries.



Executive Summary

NSW Farmers welcomes this opportunity to provide feedback from our members on the proposed Australian Animal Welfare Standards and Guidelines for Sheep. NSW Farmers advocates for best practice regulation in animal welfare and we encourage and promote to our members the need to apply a high standard of animal welfare.

We understand that the development of these nationally consistent standards and guidelines for sheep is part of the Australian Animal Welfare Strategy (AAWS). We also understand that these are intended to replace the current Model Code of Practice (MCoP) for the Welfare of sheep and will be adopted into legislation if they are endorsed by the relevant Ministers.

NSW Farmers supports Option A in the Regulatory Impact Statement (RIS) which is the conversion of the proposed national standards into national voluntary guidelines. This is because NSW Farmers is not convinced that an additional layer of regulation will actually improve animal welfare outcomes as intended. The vast majority of producers already ensure that the welfare of animals in their care is upheld and for the minority of cases where this does not occur there is already legislation, the Prevention of Cruelty to Animals Act, which can be used to enforce minimum standards.

NSW Farmers endorses a voluntary, self regulatory animal welfare program to progress best practice management. There is no need for these to be regulated or legislated to meet the aim of the AAWS to ensure that 'the welfare needs of animals are understood and met'. In fact, if there is to be adequate monitoring and enforcement of compliance then significant funding will also be required. This will mean that the standards will become an expensive solution to something which is not a problem.

If the proposed national standards are converted into national voluntary guidelines then NSW Farmers are largely supportive of the standards and guidelines contained within this document. We do have some specific concerns with some of the provisions and these have been explained in detail in this submission.

NSW Farmers has engaged in extensive consultation with our sheepmeat and wool grower members to ensure that our positions are reflective of industry. We conducted a survey of 267 sheepmeat and wool producers which, along with existing Association policy, informed a working group which was specifically tasked with developing this submission.



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1. Regulatory Impact Statement Options

1.1 Support for Option A

NSW Farmers supports Option A in the Regulatory Impact Statement (RIS) which is the conversion of the proposed national standards into national voluntary guidelines. This is because NSW Farmers is not convinced that an additional layer of regulation will actually improve animal welfare outcomes as intended. The vast majority of producers already ensure that the welfare of animals in their care is upheld and for the minority of cases where this does not occur there is already legislation, the Prevention of Cruelty to Animals Act, which can be used to enforce minimum standards.

NSW Farmers endorses a voluntary, self regulatory animal welfare program to progress best practice management. This is consistent with the results of our survey which suggest that about 85% of sheepmeat and wool producers think that there should be a nationally consistent set of principles for animal welfare. It would be more appropriate for industries to develop a best practice manual which reflects the standards and guidelines in this document. This document could be regularly updated and become a resource to assist the industry to achieve best practice outcomes. There is no need for this to be regulated or legislated to meet the aim of the AAWS to ensure that 'the welfare needs of animals are understood and met'.

NSW Farmers does not support national standards and supports Option A for the following reasons:

- The vast majority of producers already ensure that the welfare of animals under their care is upheld.
- The Prevention of Cruelty to Animals Act already exists to enforce animal welfare obligations in the small number of cases where these are neglected.
- Our survey data suggests that of those who are aware of the MCoP only 23% think that legislated minimum standards will achieve better welfare outcomes than the current MCoP.
- Black and white rules do not adequately meet animal welfare needs. Biological systems are very complicated and decision making is a sophisticated process which needs to take into account a matrix of considerations. There is strong potential for these Standards and Guidelines to create perverse outcomes in specific situations because of their lack of flexibility.
- If there is to be adequate monitoring and enforcement of compliance then significant funding will also be required.
- Around the country rural service delivery agencies and departments responsible for agriculture have seen reduced budgets and staffing numbers since the development standards and guidelines was begun in 2005. This means that there will be increasingly limited resources which governments will be prepared to devote to animal welfare activities and the adequate monitoring and enforcement of compliance will be a significant drain on these resources. This means that the standards will become an expensive solution to something which is not a problem

- at a time when resources are constrained. It would be a much better investment for governments to improve their extension capacity to drive behavioral change, rather than wasting money on compliance where there is no significant problem.
- Where consumers wish to see animal husbandry practices which impose additional cost burdens on producers but which do not compromise animal welfare then the market is the most appropriate vehicle to drive these changes. There are already auditing schemes in place, such as the Wool Declaration for the use of pain relief or Meat Standards Australia grading, which allow consumers to make purchasing choices regarding certain husbandry practices. It is inappropriate to drive change related to consumer preferences through legislation when it can be done through market mechanisms.
 - Education will always achieve a higher animal welfare outcome than legislation.

1.2 Option C Variations

While NSW Farmers supports Option A, we provide the following comments on the Option C Variations to make our position clear.

Issue	Comments
Variation C1	<p>NSW Farmers do not support this variation. Pain relief is at best transitory relief and there are better options for farmers to allocate resources to in order to improve the healing outcomes for sheep. Managing the healing of wounds is much more important than providing short term relief but the focus on drugs could have the unintended consequence of making some farmers think that they have adequately dealt with the pain of a procedure by using a product such as Tri-Solfen. In fact allowing animals to good quality feed, minimising time that lambs spend away from their mothers and ensuring that procedures are done quickly and cleanly are far more effective for pain management than the administration of a drug.</p> <p>It is also important to note that the current market for pain relief is a near monopoly with Tri-Solfen the only readily available product. It would not be appropriate to regulate where there is a near monopoly.</p>
Variation C2	<p>NSW Farmers do not support this variation if it is to become a Standard but do support it as a Guideline. This is because it is not always appropriate or possible to mules a lamb under six months and if this is the case then mulesing an older animal is a better animal welfare outcome than allowing a sheep to be fly blown. One reason why it may not be appropriate to mules a lamb under six months is if the seasonal conditions are poor. If the pasture is drying off and as such the ewes do not have as much milk then lambs can be under stress and it is better to mules them once conditions have improved.</p>
Variation C5	<p>NSW Farmers do not support this variation. As our comments under S8.2 suggest, while NSW Farmers' supports competency standards for this procedure it is impractical and unnecessary to restrict this to veterinarians alone. As people who are not veterinarians cannot access the drugs required for pain relief this variation will not be practical.</p>

Variation C6	<p>This is NSW Farmers' preferred option and we support the replacement of S6.3 with Variation C6. The reasons for this include:</p> <ul style="list-style-type: none"> • The research that Standard 6.3 has been based on is 1940's research principally done on Merino sheep. The research hasn't been replicated in the meat breeds that make up a significant proportion of the Australian sheep flock. • There does not appear to be any specific evidence to support the choice of 2 joints over 1 for the standard. It appears that the choice of 2 joints is extrapolating some research that longer tails were better than shorter. It is important that the standards are evidence based. • There is clear evidence that some management practices are easier with shorter tails therefore it is a productivity issue to enforce longer tails. Bunghole crutching for example is more difficult. • Many of the adverse consequences are only manifest in older sheep. • What is best practice for a Merino enterprise may be different to a Dorper enterprise or a British breed terminal lamb enterprise. <p>Legislating standards without due consideration of industry structure, or appropriate specific research is poor public policy.</p>
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1.3 Mulesing

While a ban on mulesing is not considered in these standards and guidelines, NSW Farmers wishes to make it clear that we do not support a ban on mulesing.

Many Australian sheep strains still require mulesing and tail stripping, together with dag management, tail docking and strategic chemical use to best minimize cutaneous myiasis, also known as flystrike. In our survey we asked producers to rank a list of husbandry practices and endemic diseases in terms of their relative welfare impact upon sheep. From this it is clear that flystrike is seen as having a much greater impact on animal welfare than mulesing. The significant welfare and animal health consequences of flystrike mean that we support the farmer's right to apply whatever breech strike protection is judged most appropriate to circumstances prevailing at any given time.

2. Standards and Guidelines

2.1 General Comments

Animal Health and Welfare

The current draft standards and guidelines reflect an artificial separation of animal welfare from animal health which both is inappropriate and unconstructive. The focus on the animal welfare impacts of various husbandry practices does not acknowledge that endemic diseases such as cutaneous myiasis or parasites can have far greater and longer term consequences for animal welfare. This has led to increased investment by government and industry, as well as individual farmers and consumers, in ensuring certain husbandry standards are upheld while at the same time governments and industry bodies are reducing their funding of endemic disease programs. This will have direct consequences for animal welfare but it is not taken into consideration when decisions about animal welfare investments are made.

Many husbandry interventions by producers, such as mulesing or handling, are aimed at endemic disease management. This means that producers have to take into account both the short term animal welfare impacts of an intervention and the long term animal welfare consequences of not intervening when managing disease.

Pain Relief

The current draft standards and guidelines over emphasise the importance of pharmaceutical pain relief and do not take into account the importance of alternative options for short and long term pain relief. The draft national standards and guidelines place significant emphasis on the need to legislate for pain relief in the first 24 hours but do not recognise that pain is something which needs to be managed over a period of days. Managing the healing of wounds is much more important than providing short term relief but the focus on drugs could have the unintended consequence of making some farmers think that they have adequately dealt with the pain of a procedure by using a product such as Tri-Solfen. In fact allowing animals to good quality feed, minimising time that lambs spend away from their mothers and ensuring that procedures are done quickly and cleanly are far more effective for pain management than the administration of a drug.

2.2 Specific Issues

Issue	Comments
<p><i>S3.2 A person in charge must ensure the inspection sheep at intervals, and at a level appropriate to the production system and the risks to the welfare of sheep.</i></p>	<p>NSW Farmers are concerned about the ability to enforce a standard which is subjective. Due to the diverse range of production systems across Australia, to stipulate a time frame is not possible. For these reasons this should become a guideline.</p>

<p><i>G3.10 Predator control programs should be implemented where predation is a risk to the welfare of sheep.</i></p>	<p>The wording of this needs to be changed to reflect the importance of participation in both individual and regional predator control plans. The wording also needs to be amended to acknowledge that predation is always a risk to the welfare of sheep. It should read: 'Individual and regional predator control plans should be implemented because predation is a risk to welfare of sheep'</p>
<p>Injuries and Disease</p>	<p>G9.16 and G9.17 indicate the importance of biosecurity in the intensive industry but there is currently nothing in the Guidelines about biosecurity being important to reduce the animal welfare impacts of disease. In the NSW Farmers' survey it is clear farmers see endemic diseases such as flystrike and worms as having a greater impact on animal welfare than husbandry practices such as mulesing or castration. To rectify this oversight there should be a Guideline before G3.11 which reads: 'Advice on biosecurity risks should be sought from qualified experts and appropriate biosecurity plan should be devised and implemented'</p>
<p><i>S5.1 A person must handle sheep in a reasonable manner and must not...</i></p>	<p>This Standard is completely unnecessary and reflective of a mindset from certain minority sectors of the community which is completely incorrect. Farmers in Australia lead the world in ensuring that the welfare of animals under their care is upheld and do not engage in unreasonable and harmful husbandry practices such as those described in this Standard except in an emergency. While NSW Farmers' does not hesitate to condemn any acts such as those described in this standard, it is both demeaning and inappropriate to include this as a Standard or Guideline. Furthermore this Standard is clearly covered under S1.1</p>
<p><i>S5.2 A person in charge of a dog that habitually bites sheep must muzzle the dog while working sheep.</i></p>	<p>While NSW Farmers' supports this as a Guideline, it is important to note that there are adverse economic consequences for farmers who have dogs who habitually bite sheep. This acts as a strong economic incentive to ensure that farmers do not allow this to happen. The reality is that it is not a problem and it is unnecessary to legislate against something is not an issue. It is also important to note that there are welfare consequences for dogs which are muzzled in hot conditions.</p>
<p><i>S6.2 A person must not tail dock sheep that are more than six months old without using pain relief and haemorrhage control.</i></p>	<p>The age of a sheep is not easily measurable and therefore it will be difficult to impossible to enforce any standard which has an age limit. This is yet another reason why these Standards should instead be Guidelines. An alternative and measurable age limit may be when sheep get their adult teeth.</p>
<p><i>S6.3 A person must leave a docked tail stump of a sheep with at least two palpable free joints remaining.</i></p>	<p>If this is to be a standard then it should be replaced by the Regulatory Impact Statement (RIS) Variation C6 which requires docked tails to have at least one free palpable joint. NSW Farmers' policy is for one free palpable joint to be standard and three free palpable joints to be best practice. The reasons for this include:</p> <ul style="list-style-type: none"> • The research that the standard has been based on is

	<p>1940's research principally done on Merino sheep. The research hasn't been replicated in the meat breeds that make up a significant proportion of the Australian sheep flock.</p> <ul style="list-style-type: none"> • There does not appear to be any specific evidence to support the choice of 2 joints over 1 for the standard. It appears that the choice of 2 joints is extrapolating some research that longer tails were better than shorter. It is important that the standards are evidence based. • There is clear evidence that some management practices are easier with shorter tails therefore it is a productivity issue to enforce longer tails. Bung hole crutching for example is more difficult. • Many of the adverse consequences are only manifest in older sheep. • What is best practice for a Merino enterprise may be different to a Dorper enterprise or a British breed terminal lamb enterprise. Legislating standards without due consideration of industry structure, or appropriate specific research is poor public policy.
<p>7. Mulesing</p>	<p>The definition of mulesing in the standards is inappropriate in terms of facilitating good animal welfare outcomes on farm.</p> <p>Many Australian sheep strains still require mulesing and tail stripping, together with dag management, tail docking and strategic chemical use to best minimize cutaneous myiasis. However many sheep breeders are developing strains of sheep that have naturally bare areas around the breach area. These sheep often only require tail stripping. If sheep only require tail stripping then it should be encouraged and recognized as a less invasive intervention.</p> <p>NSW Farmers recognizes that the mulesing definition excludes skin modifications using hot knife technology, or clips. We would encourage the tail stripping definition to be confined to removal of skin from the tail with mulesing shears.</p> <p>Mulesing and tail stripping should be defined as follows:</p> <ul style="list-style-type: none"> • Tail stripping should be defined as '<i>The removal of skin from the lateral wool bearing areas of a tail stump using mulesing shears</i>'. • Mulesing should be defined as '<i>The removal of skin from the breech or breach and tail of a sheep using mulesing shears</i>' <p>To reflect this each of the current Standards and Guidelines should be rewritten to include the words 'or tail strip' after</p>

	<p>'mules' and the words or 'tail stripping' after 'mulesing'.</p> <p>A new guideline should also be added before G7.5 which reads: <i>'Where it is appropriate to the conformation of the lamb being treated to achieve flystrike protection tail stripping should be considered in preference to mulesing'.</i></p> <p>The addition of tail stripping and this guideline will maximise welfare outcomes by ensuring that mulesing is only performed when necessary.</p>
<i>S7.3 A person must not mules sheep that are 6-12 months old without using pain relief.</i>	Please see the comments under S6.2
<i>S7.4 A person must not mules sheep showing signs of debilitating disease, weakness or ill-thrift.</i>	This Standard is superfluous and should not be included. Please see the comments under S5.1. This standard is already covered off by S1.1 and S7.1
<i>S7.5 A person mulesing sheep must only remove wool bearing skin.</i>	This Standard is superfluous and should not be included. Please see the comments under S5.1. This standard is already covered off by S1.1 and S7.1
<i>S8.2 A person must be a veterinarian, or operating under veterinary supervision, to perform surgical embryo transfer and laparoscopic insemination of sheep.</i>	While NSW Farmers' supports training requirements for this procedure, it is impractical and unnecessary to restrict this to veterinarians alone. Instead the performance of surgical embryo transfer and laparoscopic insemination of sheep should be restricted to appropriately trained technicians and veterinarians.
9. Intensive sheep production systems	This section on intensive sheep production systems does not recognise that shedded sheep are a vastly different production system to feedlots. The significance of this difference is such that NSW Farmers believes that this should go back to the writing group and they should develop separate Guidelines for shedded and feedlot sheep.
11. Humane Killing	The references to killing sheep should be changed and the term 'euthanise' used instead. This reflects the fact that when producers do kill their animals it is done to relieve pain and suffering.



Submission to Australian Animal Welfare Standards and Guidelines for Sheep

<p><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.</i></p>	<p>While NSW Farmers recognises that the use of a firearm, captive bolt or lethal injection are preferable to bleeding out by neck cut to euthanise a conscious sheep, there could be serious unintended safety consequences if this Standard is included. This is because shooting can be very dangerous, especially if performed in confined circumstances or where multiple animals have to be euthanised promptly. An example of this could be following a bushfire where large numbers of sheep need to be euthanised. In this circumstance it can be a serious human safety risk for firearms to be used. In addition the noise of firearms can disturb other sheep and this can present a further human safety risk if sheep panic and potentially cause more stress to animals which need to be euthanised. For these reasons the method used to euthanise a sheep should be at the discretion of the person involved.</p>
<p>Glossary</p>	<p>There needs to be a definition for tail stripping and an amendment to the mulesing definition to reflect this. Please see the comments under 7. There also needs to be a definition for feedlots. Please see the comments under 9.</p>



Conclusion

Sheepmeat and wool producers in NSW lead the world in applying a high standard of animal welfare to animals in their care. This is because farmers are committed to upholding their moral and ethical obligation to provide excellent care of their animals every day. NSW Farmers advocates for best practice regulation in animal welfare and we encourage and promote to our members the need to apply a high standard of animal welfare.

NSW Farmers supports Option A in the Regulatory Impact Statement (RIS) which is the conversion of the proposed national standards into national voluntary guidelines. This is because NSW Farmers is not convinced that an additional layer of regulation will actually improve animal welfare outcomes as intended when the vast majority of producers already ensure that the welfare of animals under their care is upheld. NSW Farmers endorses a voluntary, self regulatory animal welfare program to progress best practice management.

If the proposed national standards are converted into national voluntary guidelines then NSW Farmers are largely supportive of the standards and guidelines contained within this document. We have identified certain specific areas which require changes and these constructive changes will ensure that the final document is relevant and practical.