



Submission

on the

Proposed Australian Animal Welfare  
Standards and Guidelines

for

Sheep

by the

Pastoralists & Graziers Association of  
Western Australia (Inc.)  
Livestock Committee

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2<sup>nd</sup> May 2013

## INTRODUCTION

The Pastoralists and Graziers Association of WA (Inc) (PGA) is a non-profit industry organisation established in 1907, which represents primary producers in both the pastoral and agricultural regions in Western Australia.

The PGA represents the majority of progressive Western Australian meat, wool and grain producers who believe in the benefits of competition and the reduction of government regulation within their industry. These include pastoral leaseholders and free hold farmers through the full spectrum of ownership from some of Australia's largest corporate pastoral groups, to family-owned companies and trusts and individual landholders in Western Australia.

The PGA Livestock Committee specifically represents the interests of Western Australian beef, sheep meat and wool producers in remote and rural areas.

## GENERAL COMMENT ON THE CONSULTATION REGULATION IMPACT STATEMENT

The PGA supports Option B, that is the proposed national standards as currently drafted.

The only exception is Standard S5.5

“A person must not trim or grind the teeth of sheep”.

Grinding of teeth of sheep is a customary management practice that seeks to benefit the health of sheep. As sheep become broken mouthed it is with great difficulty that they can continue to graze. Sheep do not necessarily have to be aged to suffer from broken mouth. Sheep farmers have enough practical experience to recognize which animals will benefit from teeth grinding and this will prevent individual sheep from being culled to slaughter.

The PGA suggests that this standard be modified to refer to its application to a whole of flock basis but permissible on an individual animal basis for poor dentition.

With respect to Standard S6.2

“A person must not tail dock sheep that are more than six months old without using pain relief and haemorrhage control”.

The PGA notes there are currently no pain relief products that are economic, effective and registered. Without registration by the APVMA, veterinary medicines can not be used by livestock producers. It is impractical to write an enforceable standard when livestock producers can not comply with it

With respect to Standard S6.3

“A person must leave a docked tail of a sheep with at least two palpable free joints remaining”.



The PGA notes some confusion in what the standard is attempting to achieve. The consultation RIS acknowledges that the generally regarded optimum length of a tail is to leave three palpable joints. It also notes that whilst it is well documented that short docking (i.e. leaving zero palpable joints) leads to health and welfare issues for sheep such as rectal prolapse (Thomas et al 2003) and squamous-cell carcinoma of the vulva, there is little evidence of difference between a docked tail length of one, two or three palpable free joints in terms of animal welfare.

The PGA questions the referencing on pp 25 and 26 of the 'The Five Freedoms for animals:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury and disease
- Freedom to express normal behaviour
- Freedom from fear and distress.

They are in effect statements of human requirements and therefore are subjective statements. They are not measurable outcomes of animal welfare.

At a recent public lecture at Murdoch University in Western Australia, Professor Donald Broom - Emeritus Professor of Animal Welfare at Cambridge University said that animal welfare science has moved on from freedoms and ostensible rights to listing needs, attaining objectives and talking about obligations.

Naturalness is not a part of the definition of animal welfare. Animal welfare is long term quality of life as defined by behaviour, plus the immune system and disease response of animals.

## **SPECIFIC COMMENT ON OPTION C**

The PGA find it difficult to understand that after a lengthy technical writing process, supported by a wider representative reference group, that produced the proposed national standards, one or more variations of the proposed national standards have now been introduced for comment at what seems to be the 11<sup>th</sup> hour.

Consultation Regulation Impact Statement (RIS) refers to:

*Risks to the welfare of sheep* due to deficiencies in the existing MCOP for the welfare of sheep; and to a lesser extent

*Uncertainty for industry* due to a lack of clear and verifiable standards; and

*Excess regulatory burden* arising from a lack of national consistency and unnecessary standards.

Introducing options and variations can only add to the uncertainty for industry. Uncertainty can only add to risk.

The Consultation RIS uses three evaluation criteria to quantify benefits to animal welfare:

- (i) Animal welfare benefits;
- (ii) Reduction in regulatory burden; and
- (iii) Net compliance costs to industry and government.

The PGA says that if there is no reduction in regulatory burden and an increase in net compliance costs to industry and government, there will be a concomitant reduction in animal welfare benefits.

As the consultation RIS says, there is an inherent inability to quantify benefits to animal welfare. Without profitable farm businesses, free from unnecessary compliance and regulatory costs, there will not be the proper investment in unquantifiable activities like animal welfare.

In particular, the PGA can not support Variations C1 and C2.

As the consultation RIS says, these variations will not see a likely reduction in the total number of sheep mulesed if they become standards.

Furthermore, current pain relief products that could be used in conjunction with mulesing are only available through a veterinarian. The most widely used product is Tri-Solfen, which is available as a Schedule (S) 4 product. S4 products are the third most restricted of the poisons for therapeutic use that are scheduled under the Poisons Standard 2012. This is the standard that underpins the Uniform Scheduling of Medicines and Poisons No. 3 (the SUSMP 3).

A scheduled pain relief product available through a veterinarian is not the same definition as commercially or readily available to sheep farmers.

The PGA notes that the argument used to support proposed standard 6.4 ***Requirement for pain relief under castration*** is that it is a reduction in the regulatory burden for businesses in Victoria.

That is, the need to employ the services of a veterinarian to perform castration under the base case would no longer be required and the use of a contractor would be acceptable.

Consequently, there may be a business case acceptable to sheep farmers that allows for contractors to perform mulesing. This would require contractors to have greater access to pain relief than is currently possible with the use of an S4 product in Western Australia and therefore reduce the regulatory burden associated with the need for S4 products to be prescribed by veterinary surgeons.

Whilst the PGA does not wish to criticize the authors of the consultation RIS, it is difficult to agree with the statement “Variation C1 would be likely to provide significant unquantifiable welfare benefits over and above Option B and....”. How anything can be significant when it is unquantifiable is an oxymoron.

## CONCLUDING REMARKS

The PGA believes in market forces to drive change in the commercial environment.

As the consultation RIS says, the wool industry has responded to the wishes of third party groups for a mechanism to notify markets about the use and extent of mulesing by

introducing the National Wool Declaration (NWD). This document includes information on chemical use, dark fibre risk and mulesing status. The declaration asks growers to indicate whether they have ceased mulesing or if individual mobs (or even the entire clip) have not been mulesed. It also allows growers to declare if they used a pain relief treatment during the procedure.

Whilst there has been much talk about the negative effect on sheep animal welfare caused by the mulesing procedure, there has been little to no demand for un-mulesed wool. The PGA can only conclude that the consumers of Western Australian wool do not put such a high value on wool produced from un-mulesed sheep that they wish to pay farmers to produce it.

It needs to be remembered that mulesing is an animal husbandry procedure that prevents fly-strike where flies lay eggs and their larvae grow and eat into the sheep.

It is meant to protect the health of sheep and by extension, their welfare.

The PGA also points out that instead of mulesing, many sheep farmers already practice crutching, where the wool from around the tail and between the rear legs of a sheep is removed. However, it may be needed at intervals of as much as 6-8 weeks in high fly risk conditions.

The need to comment of the consultation RIS and by extension participate in the debate over animal welfare standards and guidelines puts the PGA and its members at a disadvantage. Animal husbandry and animal welfare need to be weighed carefully. If society wishes to continue to buy the products of animal husbandry, they can not continue to expect sheep farmers to carry all the costs of wider society's expectations as to animal welfare.

Human business enterprise and animal welfare should not be considered in an adversarial way, however, if animal welfare is placed above sound business outcomes, and not positioned as part of it, good intentioned regulation will not improve animal welfare outcomes.



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