



RSPCA South Australia

Submission to
Animal Health Australia

Australian Animal Welfare Standards & Guidelines

SHEEP

Edition One
Public Consultation Version 1.0

6 May 2013

A. GENERAL COMMENTS

- i. It is recognised that many Standards are described as ‘outcome based’, resulting in confusion and misunderstanding, as well as posing difficulties for prosecution. These need to be revised and modified accordingly.
- ii. Under Purpose on page 4, paragraph 2, last sentence it states that the standards reflect community expectations. Given that the writing group does not include a community representative or that many standards reflect industry imperatives rather than community concerns, this claim lacks evidence. Paragraph 6, 2nd sentence, replace the word ‘around’ with ‘across’.
- iii. Under Scope on page 5, paragraph 5, delete animal welfare after unacceptable as this sentence should relate to any practice.
- iv. Under Development process on page 5, 2nd sentence, there is no reference to animal welfare organisations or representatives. This should be clarified in that either animal welfare is specified if there is representative from this interest group or if the reference group isn’t guided by animal welfare representatives, then this must be rectified, otherwise the whole process is flawed and unacceptable. Also, there should be a description of the next steps involved in reviewing and collating the feedback from the public consultation process.
- v. Under Principles for sheep welfare on page 7, expand 4th dot point to include the words ‘including walking freely’.
- vi. Where a high welfare risk is known to be associated with specific practices and these have been described as Guidelines, it is recommended that these become Standards.
- vii. The process following the closure of the public submissions to finalise the S&G document should be described.

B. SECTIONS

1. Responsibilities

Objective: SUPPORTED

Standards:

S1.1 SUPPORTED

Guidelines:

G1.1 SUPPORTED

G1.2 SUPPORTED

G1.3 SUPPORTED

2. Feed and water

Objective: MODIFY

Sheep have access to INSERT '*appropriate*' feed and water to ~~minimize the risk to their welfare~~ INSERT '*prevent hunger and thirst, and to meet physiological requirements*'.

Standards:

S2.1 REPLACE WITH MODIFIED G2.1

Sheep ~~should~~ MUST have access to INSERT '*appropriate*' feed and water daily, except where management practices such as shearing, preparation for sale, transport, slaughter and drenching, result in a longer period of water deprivation, to a maximum of 36 hours.

Additional Standards:

S2.2 A person in charge must ensure that sheep are not less than body condition score of 1.5 (using a scale of 1 to 5, with 1 being very emaciated and 5 being very fat)

Guidelines:

G2.1 USED TO REPLACE S2.1

G2.2, G2.3, G2.4, G2.5, G2.6, G2.7, G2.8, G2.9, G2.10 SUPPORTED

3. Risk Management of extreme weather, natural disasters, disease, injury and predation

Objective: SUPPORTED

Standards:

S3.1 SUPPORTED

S3.2 SUPPORTED

S3.3 MODIFY

A person in charge must ensure INSERT '*prompt and*' appropriate treatment for sick, injured, INSERT '*distressed*', or diseased sheep at the first reasonable opportunity.

Additional Standards converted from Guidelines:

S3.4 (G3.1 TO BECOME S3.4)

Contingency plans to minimize risks to sheep welfare MUST include:
- six dot points as listed.

S3.5 (G3.3 TO BECOME S3.5)

A person in charge must ensure that sheep that appear to be isolated from the flock, caught in structures or bogged are inspected immediately and appropriate action taken.

S3.6 (G3.5 TO BECOME S3.6)

A person in charge must ensure that sheep being fed in a drought situation are carefully observed INSERT '*at least weekly*'.

S3.7 (G3.6 TO BECOME S3.7)

A person in charge must ensure that sheep and lambs are provided with adequate shelter. In the absence of natural protection, DELETE '*consideration should be given to*' INSERT '*this may include*' the provision of shade, windbreaks or sheds.

S3.8 (G3.7 TO BECOME S3.8)

A person in charge must ensure that shorn sheep are given protection during cold conditions and sudden weather changes.

S3.9 (G3.10 TO BECOME S3.9)

Predator control programs MUST be implemented where predation is a risk to the welfare of sheep.

S3.10 (G3.12 TO BECOME S3.10)

Unexplained disease or deaths MUST be investigated to formulate appropriate remedial and preventive actions.

S3.11 (G3.14 TO BECOME S3.11)

A person must ensure that all treatments and vaccines are administered in accordance with directions and records of treatments must be kept.

Guidelines:

G3.2, G3.4, G3.5 (2nd sentence), G3.8, G3.9, G3.11, G3.13,
G3.15, G3.16 (add additional dot point – regular inspection) SUPPORTED

4. Facilities and equipment

Objective: SUPPORTED

Standards:

S4.1 SUPPORTED

Additional Standards converted from Guidelines:

S4.2 (G4.2 TO BECOME S4.2)

A person in charge must ensure that shade is provided in hot weather in outdoor pens, where sheep are penned for extended periods.

S4.3 (G4.3 TO BECOME S4.3)

A person in charge must ensure that floor surfaces is nonslip, nonabrasive and free-draining. Concrete is only recommended for high-traffic areas.

S4.4 (G4.4 TO BECOME S4.4)

A person in charge must ensure that facilities are free from protrusions and obstacles that may cause injury.

Guidelines:

G4.5 SUPPORTED

5. Handling and husbandry

Objective: SUPPORTED

Standards:

S5.1 MODIFY

(3) DELETE '*in an unreasonable manner*' after '*strike*'. *STRIKE* to be defined in glossary as '*to hit with force*'.

(4) DELETE '*except in an emergency to allow safe handling, lifting, treatment or humane killing*'

S5.2 MODIFY

A person in charge of a dog that DELETE '*habitually*' bites sheep must be muzzled when working sheep.

S5.3 SUPPORTED

S5.4 MODIFY

Electric prodders must not be used on sheep.

S5.5 SUPPORTED

S5.6 SUPPORTED

S5.7 MODIFY

A person in charge must ensure that DELETE *'tethered sheep are able to exercise daily'* INSERT *'sheep are not tethered'*.

Additional Standards converted from Guidelines:

S5.8 (G5.2 TO BECOME S5.8)

A person in charge must ensure that REASONABLE ACTION is taken when handling young lambs, heavily pregnant ewes, lame sheep and rams.

S5.9 (G5.15 TO BECOME S5.9)

A person must ensure that horn trimming does not damage soft tissue.

S5.10 (G5.17 TO BECOME S5.10)

A person in charge must ensure that sheep fitted with nets or coats are inspected *at least weekly* to ensure that they do not become tangled, cast or adversely affected by grass seeds.

S5.11 (G5.19 TO BECOME S5.11)

A person must TAKE REASONABLE ACTION when shearing and crutching to minimize cuts, and severe cuts must be treated appropriately.

S5.12 (G5.20 BECOME S5.12)

A person when harvesting wool must;

- stop if cold, wet and windy weather is experienced or predicted and adequate shelter is not available;
- release newly shorn sheep into adequate shelter or allow sheep to remain in the shed until the risk has passed;
- ensure that there is appropriate and adequate feed and water available to newly shorn sheep.

S5.13 (G5.21 TO BECOME S5.13)

A person in charge must ensure that rams that are sedated for shearing or crutching are managed to prevent exposure, sunburn and smothering in accordance with the directions of the prescribing veterinarian.

S5.14 (G5.22 TO BECOME S5.14)

A person in charge must ensure that sheep that grow and retain long wool are shorn annually.

Additional Standards:

S5.15 A person must take reasonable action when shearing and crutching pregnant ewes to minimize stress and injuries.

S5.16 A person in charge must ensure that wool is removed from the face of a sheep, if the sheep is unable to see.

Guidelines:

G5.1, G5.3, G5.4, G5.5, G5.6, G5.7, G5.8, G5.9,
G5.10, G5.11, G5.12, G5.13, G5.14, G5.16, G5.18 SUPPORTED

6. Tail docking and castration

Objective: SUPPORTED

Standards:

S6.1 SUPPORTED

S6.2 MODIFY

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

S6.3 MODIFY (INCORPORATE G6.19)

A person must INSERT *'dock the tail through the joint space and'* leave a docked tail stump of a sheep with at least two **palpable free joints** remaining

S6.4 MODIFY

A person must not castrate or use the cryptorchid method on sheep DELETE *'that are more than six months old'* without using pain relief and haemorrhage control.

Additional Standards converted from Guidelines:

S6.5 (G6.2 TO BECOME G6.5)

A person MUST NOT tail dock or castrate a lamb less than 24 hours old.

S6.6 (G6.8 TO BECOME S6.6)

A person must ensure that lambs are appropriately restrained in a lamb cradle and, must be released to land on their feet to avoid contact of the wound (s) with the ground.

S6.7 (G6.10 TO BECOME S6.7)

A person must ensure that haemorrhage is minimised by selecting an appropriate method, preventing overheating of lambs and allowing them to settle after mustering.

S6.8 (G6.11 TO BECOME S6.8)

A person must ensure that tail docking and castration are not undertaken during extreme weather.

S6.9 (G6.13 TO BECOME S6.9)

A person in charge must ensure that sheep are inspected and with minimal disturbance for signs of post-operative complications during the healing process, the day following the procedure and then alternative days for the week following the procedure, and appropriate action taken.

S6.10 (G6.16 TO BECOME S6.10)

A person must not muster and yard lambs until wounds are healed.

S6.11 (G6.18 TO BECOME S6.11)

A person using a hot knife must ensure that it is operated at the product's recommended temperature.

S6.12 (G6.21 TO BECOME S6.12)

A person must not dock the tail for cosmetic reasons or on fat-tail sheep breeds.

Guidelines:

G6.3 MODIFY

Lambs should be tail docked, castrated or made cryptorchid no younger than two weeks old.

G6.19 REMOVE AS INCORPORATED INTO S6.2

G6.1, G6.4, G6.6, G6.7, G6.9, G6.12, G6.14, G6.15, G6.17, G6.20, G6.22

SUPPORTED

7. Mulesing

Objective: MODIFY

In circumstances where mulesing is necessary for the long-term welfare of the sheep INSERT '*and non-surgical alternatives cannot be implemented*', it is done in a manner that minimises the impact of the procedure.

Standards:

S7.1 MODIFY

Only accredited operators who have the relevant knowledge, experience and skills are to perform mulesing on sheep.

S7.2 MODIFY

A person must not mules sheep that are less than 24 hours old or more than 12 DELETE '*months*' INSERT '*weeks*' old.

S7.3 MODIFY

A person must not mules sheep DELETE '*that are 6-12 months old*' without using pain relief.

S7.4 SUPPORT

S7.5 MODIFY

A person mulesing sheep must only remove INSERT '*sufficient wool-bearing skin appropriate to the conformation of the lamb being treated to achieve flystrike protection*'.

NOTE: This amalgamates G7.5.

Additional Standards converted from Guidelines:

S7.6 (G7.1 TO BECOME S7.6)

Before permitting mulesing to be undertaken, the owner of the sheep must demonstrate that other options for breech strike prevention have been considered including (as per G7.1);

- Selection for resistant conformation
- Culling susceptible sheep
- Clips
- Crutching
- Timing of shearing
- Chemicals for flystrike prevention
- Internal parasite control

S7.7 (G7.7 TO BECOME S7.7)

A person in charge must only allow mulesing when there are no alternatives and the procedure results in:

- Benefits to life-time sheep welfare
- Better flock management
- A reduced work (occupational) health and safety risk.

S7.8 (G7.12 TO BECOME S7.8)

A person in charge must ensure that lambs are appropriately restrained in a lamb cradle and must be released in a manner that ensures they land on their feet to avoid contact of the wound with the ground.

S7.9 (G7.17 TO BECOME S7.9)

A person in charge must ensure that sheep are inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken.

S7.10 (G7.18 TO BECOME S7.10)

After placement in paddocks, a person must not forcibly muster and yard lambs until mulesing wounds are healed.

S7.11 (G7.20 TO BECOME S7.11)

A person must not perform mulesing during extreme weather.

Guidelines:

G7.5 RECOMMEND TO AMALGAMATE WITH S7.5

G7.6 MODIFY

Where mulesing is performed, lambs should be at least 2 weeks of age.

G7.8 REMOVE - RECOMMENDED AS A STANDARD

G7.2, G7.3, G7.4, G7.9, G7.10, G7.11, G7.13, G7.14, G7.15, G7.16, G7.19

SUPPORTED

8. Breeding management

Objective: SUPPORT

Standards:

S8.1 SUPPORT

S8.2 MODIFY

A person must be a veterinarian DELETE *'or operating under veterinary supervision'* to perform surgical embryo transfer and laparoscopic insemination of sheep.

Additional Standards converted from Guidelines:

S8.3 (G8.1 TO BECOME S8.3)

Technicians responsible for breeding management INSERT *'must have completed a recognised training course and have a demonstrated'* understanding of the reproduction and behavior of both the ewe and the ram.

S8.4 (G8.5 TO BECOME S8.4)

A person in charge must ENSURE that ewes affected by severe injuries or lambing complications (prolapsed uterus, dystocia) receive urgent treatment or be humanely killed without delay.

S8.5 (G8.6 TO BECOME S8.5)

A person in charge must ensure that lambing ewes are placed in a sheltered paddock with APPROPRIATE FEED, when there is a risk of cold, wet or windy weather.

S8.6 (G8.7 TO BECOME S8.6)

A person in charge must ensure that predators are controlled before and during lambing.

S8.7 (G8.9 TO BECOME S8.7)

A person in charge must ensure that weak or orphaned lambs with very little chance of survival MUST be humanely killed.

S8.8 (G8.14 TO BECOME S8.8)

Laparoscopic artificial insemination and embryo transfer MUST be done using sedation, analgesia and aseptic technique.

Additional Standard:

S8.9 A person must not use electro-ejaculation to obtain semen from rams.

Guidelines:

G8.12 DELETE as S8.2 prohibits non-veterinarians from conducting artificial breeding techniques.

G8.13 DELETE as S8.11 prohibits use of electro-ejaculation for semen collection.

G8.2, G3.3, G3.4, G8.8, G8.10, G8.11 SUPPORTED

9. Intensive sheep production systems

Objective: SUPPORT

Standards:

S9.1 MODIFY

A person in charge must ensure that feed DELETE '*and water*' is available daily to sheep in intensive production systems. MAKE WATER ACCESS SEPARATE STANDARD – S9.8.

S9.2 SUPPORTED

S9.3 SUPPORTED

S9.4 SUPPORTED

S9.5 SUPPORTED

S9.6 MODIFY

A person in charge must ensure sufficient space to allow all sheep to lie DELETE '*on their sternums*' INSERT '*down with legs outstretched and without touching each other*' at the same time in an intensive production system.

S9.7 Single penning of sheep for commercial production is not permitted.

Additional Standards converted from Guidelines:

S9.8 (G9.1 TO BECOME S9.8)

A person in charge must ensure that drinking equipment MUST be inspected DAILY and maintained to ensure its correct operation, and that pipes, taps and ball valves are not blocked.

S9.9 (G9.2 TO BECOME S9.9)

A person in charge must ensure that water troughs are cleaned ~~as required~~ to prevent contamination.

S9.10 (G9.3 TO BECOME S9.10)

A person in charge must ensure that feed troughs are cleaned ~~as required~~ to prevent faecal contamination and build-up of stale and spoiled feed and dust.

S9.11 (G9.4 TO BECOME S9.11)

A person in charge must ensure that trough space is adequate for the feeding system to allow the daily intake of feed and water, and to minimize bullying and shy feeders.

S9.12 (G9.6 TO BECOME S9.12)

A person in charge must ensure that *if sheep are fed concentrates or grain that they are provided with a constant source of fibre* in the diet to promote rumination.

S9.13 (G9.7 TO BECOME S9.13)

A person in charge must ensure that the sheep in intensive wool production systems MUST be maintained at or above a body condition or fat score or two out of five (five is fattest).

- S9.14 (G9.8 TO BECOME S9.14)
A manager of an intensive sheep production system *must demonstrate they have undertaken recognized training in intensive sheep management and health, and have contact with professionals with relevant expertise.*
- S9.15 (G9.15 TO BECOME S9.15)
A person in charge must ensure that *appropriate action is taken to alleviate wool biting and other stereotypic behaviours shown by sheep in intensive production systems.*
- S9.16 (G9.16 TO BECOME S9.16)
A person in charge must ensure that prior to entry into an intensive system sheep are inspected for disease and injury and appropriate treatment undertaken.
- S9.17 (G9.17 TO BECOME S9.17)
A person in charge must ensure that a biosecurity plan is in place for introduction of sheep into an intensive production system.
- S9.18 (G9.18 TO BECOME S9.18)
A person in charge must ensure that hospital pens are used for sick or injured sheep in intensive production systems.
- S9.19 (G9.19 TO BECOME S9.19)
A person in charge must ensure that dead sheep are removed *upon detection or at least daily* in intensive production systems.
- S9.20 (G9.23 TO BECOME S9.20)
Pen surfaces must be maintained to minimize slipping and injury.
- S9.21 (G9.24 TO BECOME S9.21)
Pen surfaces must be constructed and maintained in a way that reduces the build up of manure and urine.
- S9.22 (G9.25 TO BECOME S9.22)
A person in charge must ensure that shade and shelter is provided to prevent heat and cold stress IN INTENSIVE PRODUCTION SYSTEMS.
- S9.23 (G9.25 TO BECOME S9.23)
A person in charge must ensure that all ventilation equipment is checked DAILY to ensure it is fully operational.
- S9.24 (G9.27 TO BECOME S9.24)
A person in charge must ensure that indoor housing systems with controlled or forced ventilation that rely on automatic equipment is inspected daily, or have a back-up systems to warn of mechanical failure.
- S9.25 (G9.30 TO BECOME S9.25)
A person in charge must ensure that fire alarms and adequate fire fighting equipment is fitted and maintained in all indoor housing systems.

Additional Standards:

- S9.26 A person in charge must ensure that appropriate bedding is provided and maintained in a hygienic state where sheep are penned for more than 10 days and there is a risk to welfare including abrasions and cellulitis.
- S9.27 A person in charge must ensure that water is constantly available to sheep in intensive production systems.
- S9.28 A person in charge must ensure that sheep in intensive production systems are inspected daily.

Guidelines:

- G9.21 MODIFY
REMOVE REFENCE TO SINGLE PENS BUT COULD USE DENSITY FOR HOSPITAL PENS WHERE INDIVIDUAL ANIMALS NEEDED TO BE ISOLATED.
- G9.28 MODIFY
Natural or artificial light should follow normal diurnal light patterns for sheep housed indoors.
- G9.5, G9.9, G9.10, G9.11, G9.12, G9.13,
G9.20 (ADD DOT POINT – HEALTH), G9.22, G9.29 SUPPORTED
- G9.14 REMOVE - RECOMMENDED AS A STANDARD

10. Humane killing

Objective: SUPPORTED

Standards:

- S10.1 SUPPORTED
- S10.2 MODIFY
A person killing a sheep must have the relevant INSERT '*training to demonstrate*' knowledge, experience and skills.....etc
- S10.3 SUPPORTED
- S10.4 MODIFY
A person killing sheep must DELETE '*take reasonable action*' confirm the sheep is dead.
- S10.5 MODIFY
A person killing a lamb by a blow to the forehead must ensure that the lamb weighs less than 10kilograms INSERT '*and must be done by a single, sharp blow delivered to the centre of the forehead*'.

S10.6 MODIFY

A person must only use bleeding out by neck cut to kill a conscious sheep INSERT '*in an emergency*' when there is no firearm, captive bolt or lethal injection reasonably available..

Guidelines:

G10.1, G10.2, G10.3, G10.4

SUPPORTED