

Animal Welfare Standards Public Consultation
Locked bag 3006
Deakin West
ACT 2600

Submission into the Australian Animal Welfare Standards and Guidelines

Dear Committee,

As a concerned member of the public, I would like to take this opportunity to comment on the Draft Australian Animal Welfare Standards. It is an expectation of the community that the Standards will ensure the humane treatment of livestock so that animals will not experience distress, fear and pain in everyday handling on farm and livestock premises, during husbandry procedures and due to management decisions.

The draft Standards in their current form do not adequately address this basic community expectation of an assurance of high level humane outcomes in the various production systems. The draft Standards fail to significantly raise the bar on current animal welfare practices for the following reasons;

- 1) Large proportion of the draft Standards are not prescriptive and therefore are open to interpretation resulting in weak legislation and poor enforceability. Greater improvement to the welfare of livestock could be achieved by adopting the more prescriptive and higher welfare Guidelines into the Standards.
- 2) The inclusion of terms such as “reasonable”, “unreasonable”, “appropriate” and “relevant” in several Standards make them very weak in legislative intent and would be extremely difficult to enforce. Since “reasonable action” is defined as those that are “determined by accepted practice”, such Standards encompass a range of welfare outcomes including industry practices that result in poor welfare. Therefore the use of ambiguous terminology in a Standard reinforces current sub-optimal industry practices rather than improving industry welfare performance. Several draft Standards would be difficult to enforce due to the flexibility of intent of the Standard and a few examples have been provided below:
 1. S2.1 in the draft Standards for Cattle states “A person in charge must ensure cattle have reasonable access to appropriate and adequate feed and water”. A similar Standard can be found in the Standards for Sheep. These Standards do not satisfy the community expectation that animals must be fed to maintain a good condition score and must have access to water at all times.
 2. S5.1 in the draft Standards for Cattle states “A person must handle cattle in a reasonable manner and must not strike in an unreasonable manner or punch or kick.” A similar Standard can be found in the Standards for Sheep. These Standards do not satisfy the community expectation that livestock must not be struck as it causes distress and pain and that it must not be left up to a person in charge to determine what is reasonable.
 3. S5.3 in the draft Standards for Cattle states “A person must consider the welfare of cattle when using the electric prod, and must not use it in an unreasonable manner on cattle.” A similar Standard can be found in the Standards for Sheep. These Standards do not satisfy the community expectation that electric prodders must not be used at all on livestock as there is no reasonable need for the usage of the prodder given the availability of other tools of persuasion. Additionally, the community recognises that given

the widespread over-use of the prodder in the industry, “unreasonable” in the Standard may not include commonly observed industry practices.

4. S5.9 in the draft Standards for Cattle states” A person must use appropriate methods and techniques to identify cattle that are applicable to the production system”. A similar Standard can be found for ear marking of sheep and cattle in the respective Standards. These Standards do not satisfy the community expectation that the very poor industry practices of hot-iron branding and ear marking which cause considerable pain and distress must not occur.
 5. S6.1 in the draft Standards for Sheep states” A person performing the tail docking or castration must have the relevant knowledge, experience or skills or be under the direct supervision of a person who has the relevant knowledge, experience or skills”. A similar Standard can be found for mulesing in the Standards for Sheep and for castration and dehorning in the Standards for Cattle. These Standards do not satisfy the community expectation that a person performing tail docking, castration, mulesing and dehorning must be trained by a veterinarian or be under the supervision of veterinarian.
 6. S8.1 in the draft Standards for Sheep states” A person performing artificial breeding procedures on sheep must not cause unreasonable pain, distress or injury to sheep”. This Standard does not satisfy the community expectation that sheep must be given the most effective long lasting pain relief after such procedures rather than rely on accepted industry practice to determine what constitutes “unreasonable”.
- 3) Several of the proposed Standards and Guidelines have excluded or included certain practices whilst providing time and cost savings to industry, fail to ensure basic humane outcomes for livestock. For example;
1. S5.1 in the draft Standards for Sheep states” A person must handle cattle in a reasonable manner and must not drop except to land or stand on its feet”. A similar Standard can be found for cattle in the Standards for Cattle. These Standards do not satisfy community expectation of humane handling so that poor industry practice where livestock are dropped instead of being more carefully handled is prohibited.
 2. S5.2 in the draft Standards for Sheep states “A person in charge of a dog that habitually bites sheep must muzzle the dog while working sheep.”This Standard does not satisfy community expectation of low stress handling. Additionally, it is requirement in the Australian Standards for the Export of Livestock that all dogs working sheep should be muzzled and therefore the Australian Standards for Sheep must either meet or exceed welfare outcomes in existing legislation.
 3. S9.7 in the draft Standards for Sheep states” A person in charge must ensure that a sheep housed in a single pen.....”. A similar Standard can be found for cattle. These Standards do not satisfy community expectation that animals must not suffer fear and distress and the Standard must be replaced with one that prohibits the very poor industry practice of single penning of livestock.
 4. S5.1 in the draft Standards for Cattle states” A person must handle cattle in a reasonable manner and must not deliberately dislocate or break the tail of cattle.”This Standard is not enforceable given the inclusion of the term “deliberate” and does not meet community expectation that the Standard must explicitly state a requirement for “humane handling” rather than the ambiguous “reasonable manner”.

5. S6.2 in the draft Standards for Cattle states “A person must use pain relief when castrating cattle unless cattle are less than six months old or less than 12 months old if at their first yarding...”.A similar Standard can be found for dehorning of cattle. It is a community expectation that livestock must be protected from injury, pain and distress regardless of age. To achieve this end, these Standards must ensure that a local anaesthetic must used before extremely painful procedures like castration and dehorning and the most effective long lasting pain relief must be used after the procedure, for all animals regardless of age. These Standards must also require that a person performing these procedures must be trained by a veterinarian or under the supervision of a veterinarian.
6. S6.5 in the draft Standards for Cattle states ”A person must consider the welfare of the calf when using caustic chemicals for disbudding....”.The use of caustic chemicals to disbud animals is a dangerous and poor industry practice which does not satisfy community expectation for humane treatment of livestock. The Standard must prohibit the use of caustic chemicals to disbud and instead state that the hot-iron cautery method must be used and only by a person trained by a veterinarian or under the supervision of a veterinarian.
7. It is noted that the Standards and Guidelines for Beef Feedlots fail to explicitly state that shade should be provided for all animals as an appropriate action to manage ongoing heat load risk. This omission is considerably out of touch with community expectation as it expected that all livestock regardless of production system, have access to adequate shelter.

It is my belief that the following Standards (as opposed to the Guidelines) should be incorporated into the Australian Animal Welfare Standards and Guidelines –Sheep:

- 1) The Standards for Feed and Water must state that;
 - i. Sheep must have access to water at all times.
 - ii. Sheep must be kept in good body condition.
- 2) The Standards for Risk management of extreme weather, natural disasters, disease, injury and predation must state;
 - i. Sheep must have access to adequate shelter.
- 3) The Standards for Handling and Husbandry must state;
 - i. A person must not throw or drop sheep irrespective of the height above the ground.
 - ii. Striking of sheep is not permitted.
 - iii. Electric prodding device usage is not permitted.
 - iv. Dogs must be muzzled when working with sheep.
 - v. Permanent tethering is not permitted.
 - vi. Horn trimming must not cause soft tissue damage
 - vii. Ear Marking is not permitted.
- 4) The Standards for Tail docking and Castration must state;
 - i. Pain relief must be used on all animals regardless of age during castration and tail docking.
 - ii. Lambs destined for slaughter must not be castrated.
 - iii. Docked tails need to be long enough to cover the vulva in female lambs and similar in males.

- iv. A person performing Tail docking or Castration must be under the supervision of a veterinarian or trained by a veterinarian.
- 5) The Standards for Mulesing must state that;
 - i. If mulesing must be carried out, sheep must not be older than 12 weeks of age.
 - ii. Pain relief must accompany mulesing regardless of age.
 - iii. A person performing mulesing must be under the supervision of a veterinarian or trained by a veterinarian.
 - 6) The Standards for Breeding management must state that;
 - i. Embryo transfer and laparoscopic artificial insemination must be conducted with pain relief.
 - ii. Electro-ejaculation is not permitted.
 - 7) The Standards for Intensive systems must state that;
 - i. Single penning of sheep is not permitted.
 - ii. Sheep in intensive systems must be given sufficient room for all animals to lie down simultaneously with their legs outstretched.
 - iii. Sheep must be given enough roughage for rumination.
 - 8) The Standards for Humane Killing must state that;
 - i. Sheep that are to be euthanised on farm must be killed a captive bolt gun or firearm and not by cutting the throat.

It is my belief that the following Standards (as opposed to the Guidelines) should be incorporated into the Australian Animal Welfare Standards and Guidelines –Cattle:

- 1) The Standards for Feed and Water must state that;
 - i. Cattle must have access to water at all times.
 - ii. Cattle must be kept in good body condition.
- 2) The Standards for Risk management of extreme weather, natural disasters, disease, injury and predation must state that;
 - i. Cattle must have access to adequate shelter.
- 3) The Standards for Handling and Management must state that;
 - i. A person must not drop cattle.
 - ii. Striking of cattle is not permitted.
 - iii. Electric prodding device usage is not permitted.
 - iv. Breaking or dislocating the tail is not permitted.
 - v. Dogs are not permitted to work calves.
 - vi. Permanent tethering is not permitted.
- 4) The Standards for Painful Procedures must state that;
 - i. Electro-immobilisation is not permitted.
 - ii. Hot-iron branding is not permitted.
 - iii. Ear marking is not permitted.
 - iv. Pain relief is used on all animals regardless of age.
 - v. Dehorning is phased out.
 - vi. Disbudding the horns of young animals with caustic chemicals is not permitted.
 - vii. Hoof paring must not cause soft tissue damage.
 - viii. A person performing dehorning , disbudding or hoof paring , must be under the supervision of a veterinarian or trained by a veterinarian.

- 5) The Standards for Breeding management must state that;
 - i. Birth control procedures like flank spaying and webbing are not permitted.
 - ii. Routine induction of calves is not permitted.
 - iii. Electro-ejaculation is not permitted.
 - iv. A person spaying cattle or inducing calves must be a veterinarian or under perform the procedure under the supervision of a veterinarian.

- 6) The Standards for Dairy Management must state that;
 - i. Single penning of calves is not permitted.
 - ii. Strategies for Mastitis and Lameness prevention must be in place.

- 7) The Standards for Feedlots must state that;
 - i. Feedlots must be accredited by a third party.
 - ii. Feedlots must provide shade for all cattle.
 - iii. Feedlots must facilitate exercise for all cattle.
 - iv. Adequate roughage must be provided in feed.
 - v. Pregnant cattle must not be allowed into feedlots.

- 8) The Standards for Humane Killing must state that;
 - i. Calves that are to be euthansed on farm must be killed a captive bolt gun or firearm and not by a blow to the head.

Thank you.