

Submission by Sentient, The Veterinary Institute for Animal Ethics, on the draft Australian Animal Welfare Standards and Guidelines for Sheep (Edition One, Public Consultation Version 1.0, 21 February 2013).

General comment on standards and guidelines

- If these are to be regulated standards, there is an inherent implication that such standards will be enforced. Many of the standards contained in this document are 'motherhood statements' which are difficult to audit, more difficult to enforce and are therefore open to interpretation by the courts.
- Edition One needs far greater consultation with law enforcement agencies.
- This edition also lacks any review of the scientific literature on sheep welfare and husbandry.

Introduction

- Page 5, 'Scope' – Advice or assistance with welfare management or disease control is not so readily available as this document suggests. Concerning trends are the reduction of funding of staff in agriculture departments nationally and the shift away from preventative work.

1) Responsibilities

- S1.1: 'A person must take reasonable actions to ensure the welfare of sheep under their care.' Such a general statement is impossible to audit and is meaningless unless all of the guidelines listed under G1.1 are included as part of the actual standard.
- G1.1: Elements of responsibility for sheep management **must** (not 'should') include all actions listed. Furthermore, we submit the following additions (in bold):
 - Understanding **and appropriately applying** the standards and guidelines for sheep welfare
 - Identifying distressed, weak, injured, **low body weight** or diseased sheep, and taking appropriate action

2) Feed and water

- S2.1: 'A person in charge must ensure sheep have reasonable access to adequate and appropriate feed and water'. This is another example of a motherhood statement which cannot be audited. G2.1 should be the standard.
- G2.1: Sheep **must** (not 'should') have access to feed and water daily, except where reasonable management practices, such as shearing, preparation for sale, transport, slaughter and drenching, resulting in a longer period of water deprivation, to a maximum of 48 hours (**24 hours in the case of lambs, pregnant or lactating ewes, lambs or under excessive temperatures**). Feed and water deprivation exceeding 48 hours (**24 hours in the case of lambs, pregnant or lactating ewes or under excessive temperatures**) **must** ('not should') be avoided. *Note: in the case of prime lambs, feed and water deprivation exceeding 24 hours is likely to affect carcass quality due to changes in metabolic rate including glucose and creatinine.*

- G2.2: 'If sufficient feed and water cannot be provided to sheep, options that **must** (not 'should') be considered are to relocate, agist, sell or humanely kill the sheep before sheep welfare is adversely affected. **Include minimal tolerable body condition scores (eg, BCS of 2) before these options are considered, and provide sheep with BCSs of under 2 with preferential feeding, frequent monitoring and reassessment.'**

3) Risk management of extreme weather, natural disasters, disease, injury and predation

- G3.1: This should be added to S3.1 and should read as follows: 'Contingency plans to minimise risks to sheep welfare **must** (not 'should') include ...'
- G3.2: This should be added to S3.2 and should read as follows: 'Inspection of sheep **must** (not 'should') take into consideration ...'
- G3.3: This should be added to S3.2 and should read as follows: 'Sheep that appear to be isolated from the flock, caught in structures or bogged **must** (not 'should') be inspected immediately and appropriate action taken.'
- G3.6: This should be a standard (S3.4) and should read as follows: 'Sheep and lambs **must** (not 'should') be provided with adequate shelter ...'
- G3.7: This should be a standard (S3.5) and should read as follows: 'Shorn sheep **must** (not 'should') be given protection during cold conditions and sudden weather changes.'
- G3.9: This should be a standard (S3.6) and should read as follows: 'Sheep handling **must** (not 'should') be minimised during extreme weather and particularly during extremely hot **or extremely humid** weather, **except in the interest of providing for their immediate welfare.'**
- G3.10: This should be a standard (S3.7) and should read as follows: 'Predator control programs **must** (not 'should') be implemented where predation is a risk to the welfare of sheep.'
- G3.11: This should be a standard (S3.8) and should read as follows: 'Advice on sheep disease prevention or treatment **must** (not 'should') be sought from qualified advisors. A health management plan **must** (not 'should') be devised and implemented.' *Note: this is a key component of dog and cat breeding and should equally be applied to sheep.*
- G3.12: This should be a standard (S3.9) and should read as follows: 'Unexplained disease and deaths **must** (not 'should') be investigated to formulate appropriate remedial and preventive actions.'
- G3.13 to G3.16: It seems illogical to set guidelines for what should be standard industry practice. For instance, failure to vaccinate against relevant diseases (G3.13) could lead to biosecurity risks and a drop in production. The only way to detect rogue or inhumane farming practices is to mandate minimum standards. The inclusion of G3.13 to G3.16 as mere 'guidelines' represents very poor welfare regulation, and would be seen as such by Europe, with possible trade implications. These are basic expectations and are in line with international standards and trade expectations.
- G3.13: This should be a standard (S3.10) and should read as follows: 'Sheep **must** (not 'should') be vaccinated against relevant diseases.'
- G3.14: This should be a standard (S3.11) and should read as follows: 'Treatments and vaccines **must** (not 'should') be administered in accordance with directions. Records of treatments **must** (not 'should') be kept.' *Note: this also has significance for other legislation such as the Agricultural and Veterinary Chemicals Act.*

- G3.15: This should be a standard (S3.12) and should read as follows: ‘Internal and external parasites **must** (not ‘should’) be monitored and controlled.’
- G3.16: This should be a standard (S3.17) and should read as follows: ‘Where flystrike is a risk, preventive techniques **must be implemented** (not ‘that should be considered ...).’ This standard should be followed by a guideline that states: ‘**Flystrike preventive techniques may include ...**’ followed by the techniques listed under G3.16, with the following changes:
 - **Selecting appropriate flystrike prevention techniques** (addition)
 - Mulesing lambs **must only be considered as a last resort and must only be performed as a veterinary procedure**

4) Facilities and equipment

- G4.1: This should be a standard (S4.1a) and should read as follows: ‘Facility construction or modification **must** (not ‘should’) take into account ...’
- G4.2: This should be a standard (S4.1b) and should read as follows: ‘Shade **must** (not ‘should’) be **provided** (not ‘considered’) in hot weather for outdoor pens where sheep are penned for extended periods.’
- G4.3: This should be a standard (S4.1c) and should read as follows: ‘Floor surfaces **must** (not ‘should’) be nonslip, nonabrasive and free-draining. Concrete is only recommended for high-traffic areas. **Appropriate bedding must be provided in circumstances where animals are penned for over 10 days.** *Note: this is to minimise risk of cellulitis, joint abrasions, septicaemia etc).*
- G4.4: This should be a standard (S4.1d) and should read as follows: ‘Facilities **must** (not ‘should’) be free from protrusions and obstacles that may cause injury.’
- G4.5: This should be a standard (S4.1e) and should read as follows: ‘Facilities and equipment for restraining sheep **must** (not ‘should’) only be used for the minimum time necessary and with the minimum restraint necessary.’
- Suggest additional standard (S4.1f): ‘**Staff must be trained in the appropriate use of facilities and equipment.**’

5) Handling and husbandry

- S5.1.3: ‘A person must handle sheep in a reasonable manner and must not **strike** (not ‘strike in an unreasonable manner’ – what would constitute ‘reasonable’ striking?), punch or kick;’
- S5.1.4: ‘A person must handle sheep in a reasonable manner and must not **drag sheep** (not ‘drag sheep that are not standing by only one leg’, which is of unclear scientific justification), except in an emergency ...’
- S5.2: ‘A person in charge of a dog that habitually bites sheep must muzzle the dog while working sheep’. Use of the word ‘habitually’ is not specific enough for auditing. Suggested alternative standard: ‘**All dogs must be muzzled while working or around sheep.**’
- S5.4: **Electric prodders must never be used when handling sheep.** (not ‘A person must consider the welfare of sheep when using an electric prodder ...’). *Note: the presence of electric prodders in yards makes it too easy for them to be misused and enforcement of guidelines is problematic.*

- S5.7: 'A person in charge must ensure that tethered sheep are able to exercise daily **and have continuous access to water and appropriate grazing vegetation.**'
- G5.2: This should be a standard (S5.8) and should read as follows: 'Extra care **must** (not 'should') be taken when handling sheep with special needs – for example, young lambs, heavily pregnant ewes, lame sheep and rams.'
- G5.5: This should be a standard (S5.9) and should read as follows: 'During mustering, sheep **must** (not 'should') be rested or allowed to slow if they show signs of labored breathing.'
- G5.7: This should be a standard (S5.10) and should read as follows: 'Overcrowding of sheep in pens or yards **must** (not 'should') be avoided. Precautions **must** (not 'should') be taken to prevent smothering, especially for lambs and weaners.'
- G5.9: This should be a standard (S5.11) and should read as follows: 'Sheep **must** (not 'should') be returned to feed and water as soon as **practicable** (not 'possible') after handling.'
- G5.11: The first section should be a standard (S5.12) and should read as follows: 'Operators **must** (not 'should') adopt practices to manage risk from dipping and other forms of ectoparasite treatment ...'. The remaining section, that begins 'When dipping sheep ...' should form G5.11.
- G5.13: This should be a standard (S5.13) and should read as follows: 'Operators **must** (not 'should') adopt practices to manage risk from drenching and other forms of oral treatments ...'
- G5.14: This should be a standard (S5.14) and should read as follows: 'Manufacturer's instructions **must** (not 'should') be followed for husbandry procedures for sheep, such as applying clips and eartags **except where alternative instructions have been prescribed by a veterinarian.**'
- G5.15: This should be a standard (S5.15) and should read as follows: 'Horn trimming **must always avoid** (not 'should avoid excessive') damage to soft tissue **and must only be performed using local anaesthesia (nerve blocks).**'
- G5.16: 'Earmarking, tagging, tattooing and vaccination should be done in a way that minimises the risk of infection and with instruments that are sharp and **free of organic matter and contamination by pathogens**' (not 'clean', which is poorly defined).
- G15.17: This should be a standard (S5.16) and should read as follows: 'Sheep fitted with nets or coats **must** (not 'should') be inspected regularly to ensure that they do not become tangled, cast or adversely affected by grass seeds.'
- G15.19: This should be a standard (S15.17) and should read as follows: 'Care **must** (not 'should') be taken when shearing and crutching to minimise cuts, and severe cuts **must** (not 'should') be treated at the first reasonable opportunity.'
- G5.20: The final point should be a standard (S5.18) and should read as follows: '**When harvesting wool, persons in charge must ensure there is adequate feed and water and adequate shelter available for newly shorn sheep.**'
- G5.21: This should be a standard (S5.19) and should read as follows: 'Rams that are sedated for shearing or crutching **must** (not 'should') be managed to prevent exposure, sunburn and smothering in accordance with the directions of the prescribing veterinarian.'
- G5.22: This should be a standard (S5.20) and should read as follows: 'Sheep that grow and retain long wool **must** (not 'should') be shorn annually.'

6) Tail docking and castration

Preface: Sentient does not condone the use of invasive procedures such as tail docking or castration unless they are performed by a qualified veterinarian using the best available anaesthesia (such as nerve blocks) and post-operative analgesia. Whilst such practices persist in the Australian community, however, we advocate for at least the following improved conditions for affected sheep:

- S6.2: 'A person must not tail dock **any sheep** (not 'sheep that are more than six months old') without using **appropriate analgesia** (not 'pain relief') and haemorrhage control.'
- S6.4: 'A person must not castrate or use the cryptorchid method on **any sheep** (not 'on sheep that are more than six months old') without using **appropriate analgesia** (not 'pain relief') and haemorrhage control. **The rubber ring method of castration must not be used due to poor welfare outcomes associated with sustained pain.**
Note: Pain associated with tail docking and castration by rubber ring methods is not effectively relieved by topical analgesics, which are the most practical and therefore most likely form of analgesics to be used by farmers.
- G6.2: This should be a standard (S6.5) and should read as follows: 'Tail docking and castration **must only** (not 'should') be done after a secure maternal bond has been established, and after the lambs are 24 hours old.'
- G6.5: This should be a standard (S6.6) and should read as follows: '**Infection must be minimised by** good hygiene practices, **which must** (not 'should') be practiced in relation to facilities, hands, handling and instruments. Disinfectant **must** (not 'should') be used and changed frequently.'
- G6.6: '**Infection should be minimised by** avoiding muddy or dusty yards, and wet or humid weather.'
- G6.7: This should be a standard (S6.7) and should read as follows: 'Operators **must** (not 'should') adopt appropriate strategies to minimise the risk and impact of common infections ... through vaccination of lambs and/or their mothers.'
- G6.8: This should be a standard (S6.8) and should read as follows: 'Lambs **must** (not 'should') be appropriately restrained in a lamb cradle and **must be released in such a way as to ensure they** (not 'when released, should') land on their feet to avoid contact of the wound(s) with the ground.'
- G6.10: This should be a standard (S6.9) and should read as follows: 'Haemorrhage **must** (not 'should') be minimised by selecting an appropriate method, preventing overheating of lambs and allowing them to settle after mustering.'
- G6.11: This should be a standard (S6.10) and should read as follows: 'Tail docking and castration **must** (not 'should') not be undertaken during extreme weather.'
- G6.13: This should be a standard (S6.11) and should read as follows: 'Sheep **must** (not 'should') be inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken.'
- G6.14: This should be a standard (S6.12) and should read as follows: 'Tail docking and castration **must always** be accompanied by pain relief (not 'should be accompanied by pain relief when practical and cost effective methods become available'). Operators **must** (not 'should') seek advice on current pain minimization strategies.' *Note: The original guideline is too weak and provides a ready defense for lack of analgesia, the use of which should be a condition of rearing sheep.*

- G6.16: This should be a standard (S6.13) and should read as follows: ‘After placement in paddocks, lambs **must** (not ‘should’) not be forcibly mustered and yarded until wounds are healed.’
- G6.17: This should be a standard (S6.14) and should read as follows: ‘Lambs **must** (not ‘should’) be tail docked **using the best available method based on minimising welfare risks. Currently the hot knife is the preferred method. Rubber ring methods should never be used.** (not “Lambs should be tail docked by the hot knife or rubber ring methods ...”). Recommendations may change with future research and development **and it is unacceptable for outdated techniques to be favoured in the interests of logistical ease for farmers.**’ *Note: Pain associated with tail docking and castration by rubber ring methods is not effectively relieved by topical analgesics, which are the most practical and therefore most likely form of analgesics to be used by farmers.*
- G6.18: This should be a standard (S6.15) and should read as follows: ‘A hot knife **must** (not ‘should’) be operated at the recommended temperature.’
- G6.19: This should be a standard (S6.16) and should read as follows: ‘The tail **must** (not ‘should’) be docked through the joint space.’
- G6.20: This should be a standard (S6.17) and should read as follows: ‘The docked tail **must** (not ‘should’) be long enough to cover the vulva in female lambs and be of similar length in males.’
- G6.21: This should be a standard (S6.18) and should read as follows: ‘Tail docking **must** (not ‘should’) not be done for cosmetic reasons or on fat-tail sheep breeds.’ *Note: the difficulty of auditing this standard.*
- G6.22: This should be a standard (S6.19) and should read as follows: ‘Lambs destined for slaughter before they are 12 weeks old, or before the onset of puberty, **must** (not ‘should’) not be castrated.’

7) Mulesing

Preface: Sentient opposes the ongoing practice of mulesing and promotes sustainable and humane alternatives, particularly genetic selection for breeding lines that are not prone to breech flystrike. Adopting this position would be a positive step towards improving Australia’s international reputation on the issue. Whilst mulesing remains an accepted practice by industry, the incentive to pursue alternatives to their greatest advantage is minimised. We therefore propose a phasing-out period, with mulesing to be prohibited by 2017 (three years after these standards are proclaimed). During that period, mulesing must be considered as a last resort, and only then be performed as a veterinary procedure. Given the prevalence with which mulesing is performed by farmers in the Australian community, we have made comments to guidelines that would otherwise be redundant (G7.10, G7.12, G17.20) in order to advocate for improved conditions for affected sheep:

- S7.1: Renumber as S7.4. ‘**Mulesing must only be performed by a registered veterinarian using appropriate anaesthesia and analgesia**’. (not ‘A person performing mulesing must have the relevant knowledge, experience, and skills, or be under the direct supervision of a person who has the relevant knowledge, experience and skills.’). *Note: Ensuring the competency of operators depends on the existence of a bona fide accreditation program. Also, the use of analgesia by veterinarians only addresses the acute pain associated with the procedure, but not the significant pain*

associated with the healing process. For this reason, mulesing remains an ongoing welfare issue.

- S7.2: Renumber as S7.5. 'A person must not mules sheep that are less than 24 hours old or more than **four** (not '12') months old.' *Note: In line with S7.4, this 'person' is assumed to be a registered veterinarian. The more generic term remains in case S7.4 is not adopted.*
- S7.3: Renumber as S7.6 and reword as follows: 'A person must not mules **any** sheep (not 'sheep that are 6-12 months old') without using pain relief.' *Note: This standard will be redundant if our proposal for S7.4 is adopted, but must apply otherwise.*
- S7.4: Renumber as S7.7.
- S7.5: Renumber as S7.8.
- G7.1: This should be a standard (S7.1) and should read as follows: '**Alternatives** (not 'the options') for breech strike prevention **must** (not 'should') be considered before undertaking mulesing including:
 - Selection for resistant conformation
 - Culling susceptible sheep
 - Clips
 - Crutching
 - Timing of shearing
 - Chemicals for flystrike prevention
 - Internal parasite control

Taking a longer term view, the focus of alternatives must be concentrated on selection for resistant conformation, with a three year phasing out period before mulesing is prohibited by 2017.'

- G7.1: Suggested alternative: '**Consideration of alternatives to mulesing may be undertaken in consultation with a veterinarian.'**
- G7.2: This should be a standard (S7.2) and should read as follows: 'Selection for breech flystrike-resistant conformation **must** (not 'should') include low dag score, low wrinkle score and low breech cover score.'
- G7.5: This should be a standard (S7.9) and should read as follows: 'The mulesing operation **must** (not 'should') only remove sufficient wool-bearing skin appropriate to the conformation of the lamb being treated to achieve flystrike prevention.'
- G7.7: This should be a standard (S7.3) and should read as follows: 'Mulesing **must** (not 'should') only be done when there are no alternatives and the procedure results in benefits to lifetime sheep welfare or better flock management' (not 'a reduced occupational health risk').
- G7.8: This should be a standard (S7.10) and should read as follows: 'Mulesing **must always** (not 'should') be accompanied by **post-operative** pain relief (not 'where practical and cost effective methods are available' and omit 'Operators should seek advice on current pain minimisation strategies' since mulesing should be a veterinary procedure).
- G7.9: This should be a standard (S7.11) and should read as follows: '**Risk of infection must be minimised by** good hygiene practices, **which must** (not 'should') be practiced in relation to facilities, hands, handling and instruments. Disinfectant **must** (not 'should') be used and changed frequently.'

- G7.10: **'Infection should be avoided** by avoiding muddy or dusty yards, and wet or humid weather.'
- G7.11: This should be a standard (S7.12) and should read as follows: 'Operators **must** (not 'should') adopt appropriate strategies to minimise the risk and impact of common infections ... through vaccination of lambs and/or their mothers.'
- G7.12: This should be a standard (S7.13) and should read as follows: 'Lambs **must** (not 'should') be appropriately restrained in a lamb cradle and **must be released in such a way as to ensure they must** (not 'when released, should') land on their feet to avoid contact of the wound(s) with the ground.'
- G7.16: This should be a standard (S7.14) and should read as follows: 'Mulesing **must only** (not 'should') be done when fly activity is minimal, or in conjunction with appropriate preventive flystrike treatment.'
- G7.17: This should be a standard (S7.15) and should read as follows: 'Sheep **must** (not 'should') be inspected daily and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken.'
- G7.18: This should be a standard (S7.16) and should read as follows: 'After placement in paddocks, lambs **must** (not 'should') not be forcibly mustered and yarded until wounds are healed.'
- G7.20: This should be a standard (S7.17) and should read as follows: 'Mulesing **must** (not 'should') not be undertaken during extreme weather.'

8) Breeding management

- S8.2: 'A person must be a veterinarian, or operating under **direct** veterinary supervision, to perform surgical embryo transfer and laparoscopic insemination of sheep.'
- G8.1: This should be a standard (S8.3) and should read as follows: 'Technicians responsible for breeding management **must** (not 'should') have an understanding of reproduction and behaviour of both the ewe and the lamb.'
- G8.3: This should be a standard (S8.4) and should read as follows: 'In the last 4-6 weeks of pregnancy, management practices **must** (not 'should') minimise stress on ewes to reduce pregnancy toxæmia and other metabolic diseases.'
- G8.5: This should be a standard (S8.5) and should read as follows: 'Ewes that receive severe injuries during lambing or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove lamb) **must** (not 'should') receive urgent treatment or be humanely killed without delay.'
- G8.6: This should be a standard (S8.6) and should read as follows: 'Lambing ewes **must** (not 'should') be placed in a sheltered paddock with quality feed, especially if there is a risk of cold, wet or windy weather.'
- G8.8: This should be a standard (S8.7) and should read as follows: 'Newborn lambs orphaned at birth **must** (not 'should') receive colostrum or colostrum substitute as soon as possible after birth.'
- G8.9: This should be a standard (S8.8) and should read as follows: 'Weak or orphaned lambs with very little chance of survival **must** (not 'should') **be monitored appropriately and** be humanely killed.'
- G8.10: This should be a standard (S8.9) and should read as follows: 'Rams **must** (not 'should') be checked at regular intervals for injuries and disease.'

- G8.12: This should be a standard (S8.10) and should read as follows: ‘Technicians conducting artificial insemination, embryo transfer or electro-ejaculation of sheep **must** (not ‘should’) be trained and competent in these techniques.’
- G8.14: This should be a standard (S8.11) and should read as follows: ‘Laparoscopic artificial insemination and embryo transfer **must** (not ‘should’) be done using **deep sedation with appropriate analgesia, or using general anaesthesia** (not ‘sedation or analgesia’) and aseptic technique, **and must only be performed by a registered veterinarian.**’ *Note: it is insufficient to perform abdominal surgery under light sedation and this practice would not be condoned for non-production animals.*

9) Intensive sheep production systems

Preface: Sentient does not condone the intensive housing of sheep and will always promote alternatives. Whilst such practices persist in the Australian community, however, we advocate for at least the following improved conditions for affected sheep:

- S9.1: ‘A person in charge must ensure that feed (not ‘and water’) is available daily **and that fresh water is constantly available** to sheep in intensive production systems.’
- S9.2: ‘A person in charge must ensure the daily inspection of sheep in the first **month** (not ‘week’) of confinement, to ensure adaptation to the intensive production system.’
- S9.4: ‘A person in charge must not allow faeces and urine to accumulate **for more than 24 hours in the pen** (not ‘to the stage that compromises the welfare of sheep’) in an intensive production system, **and must ensure that underneath the shed floor is scraped regularly to prevent increases in ammonia levels, which must not reach over 25ppm.**’
- S9.5: ‘A person in charge must ensure an indoor housing system for sheep has effective ventilation’. *Note: minimal tolerable ammonia levels must be prescribed.*
- S9.6: ‘A person in charge must ensure sufficient space to allow all sheep to lie on their sternums, **to stand up and turn around, and to walk freely** at the same time in an intensive sheep production system.’
- G9.1: This should be a standard (S9.8) and should read as follows: ‘Drinking equipment **must** (not ‘should’) be inspected regularly and maintained to ensure its correct operation, and that pipes, taps and ball valves are not blocked.’
- G9.4: This should be a standard (S9.9) and should read as follows: ‘Trough space **must** (not ‘should’) be adequate **to allow all sheep access to food and water** (not ‘for the feeding system to allow the daily intake of feed and water’) and to minimise bullying and shy feeders.’
- G9.6: This should be a standard (S9.10) and should read as follows: ‘Sufficient fibre **must** (not should) be provided in the diet to promote rumination.’
- G9.7: This should be a standard (S9.11) and should read as follows: ‘Sheep for intensive wool production systems **must** (not ‘should’) be maintained at or above a body condition or fat score of two out of five (five is the fattest).’
- G9.11: This should be a standard (S9.12) and should read as follows: ‘**Inspections must be carried out daily and** during inspections particular attention **must** (not ‘should’) be given to identifying signs of sickness’
- G9.13: This should be a standard (S9.13) and should read as follows: ‘Lighting in indoor systems **must** (not ‘should’) be adequate to allow inspect of all sheep.’

- G9.14: This should be a standard (S9.14) and should read as follows: ‘Sheep **must** (not ‘should’) not be housed in single pens. **Sheep in intensive systems must be in visual, auditory and tactile proximity to conspecifics and threats by predatory animals, by way of visual or auditory stimulation, must be prevented.**’
- G9.15: This should be a standard (S9.15) and should read as follows: ‘Wool biting and other stereotypic behaviours **must** (not ‘should’) be addressed.
- G9.16: This should be a standard (S9.16) and should read as follows: ‘Prior to entry into an intensive system, sheep **must** (not ‘should’) be inspected for disease and injury and appropriate treatment undertaken.’
- G9.17: This should be a standard (S9.17) and should read as follows: ‘A biosecurity plan **must** (not ‘should’) be in place for the introduction of sheep to the system.’
- G9.18: This should be a standard (S9.18) and should read as follows: ‘Intensive systems **must** (not ‘should’) have hospital pens for sick or injured sheep.’
- G9.19: This should be a standard (S9.19) and should read as follows: ‘Dead sheep **must** (not ‘should’) be removed as soon as possible.’
- G9.21: This should be a standard (S9.20) and should read as follows: ‘Table 9.1 **must** (not ‘should’) be used as a guide for the minimum space allowances per sheep in a pen or feedlot.’
- G9.22: This should be a standard (S9.21) and should read as follows: ‘Dust **must** (not ‘should’) be minimised within the intensive system.’
- G9.23: This should be a standard (S9.22) and should read as follows: ‘Pen surfaces **must** (not ‘should’) be maintained to minimise slipping and injury **and appropriate bedding must be provided.**’
- G9.24: This should be a standard (S9.23) and should read as follows: ‘Pen surfaces **must** (not ‘should’) be constructed and maintained in a way that reduces the build-up of manure and urine.’
- G9.25: This should be a standard (S9.24) and should read as follows: ‘Shade and shelter **must** (not ‘should’) be provided to prevent heat and cold stress **and this must be available to all sheep**’.
- G9.26: This should be a standard (S9.25) and should read as follows: ‘All ventilation equipment **must** (not ‘should’) be checked regularly to ensure it is fully operational.’
- G9.27: This should be a standard (S9.26) and should read as follows: ‘Indoor housing systems with controlled or forced ventilation that rely on automatic equipment **must** (not ‘should’) be inspected daily, or have a back-up system to warn of mechanical failure.’
- G9.28: This should be a standard (S9.27) and should read as follows: ‘Natural or artificial light **must** (not ‘should’) be adequate for all sheep housed in indoor systems.’
- G9.29: This should be a standard (S9.28) and should read as follows: ‘A contingency plan **must** (not ‘should’) be in place for the following ...’.
- G9.30: This should be a standard (S9.29) and should read as follows: ‘Fire alarms and adequate firefighting equipment **must** (not ‘should’) be fitted and maintained in all indoor housing systems.’

10) Humane killing

- S10.4: ‘A person killing sheep must (not ‘must take reasonable action to’) confirm the sheep is dead.’

- S10.5: **A person killing sheep must never do so by delivering a blow to the head.** (not: 'A person killing a lamb by a blow to the forehead must ensure that the lamb weighs less than ten kilograms'.) *Note: this is consistent with the AVMA (American Veterinary Medical Association) guidelines: S3.2.2.4, Unacceptable Methods – The following methods are unacceptable for euthanasia of cattle and small ruminants: manually applied blunt trauma to the head.*
- G10.3: This should be removed (see S10.5).
- G10.4: This should be a standard (S10.6) and should read as follows: 'Bleeding out of sheep without prestunning using the neck cut **must** (not 'should') only be done as a last resort using a suitable, sharp knife. **Exemptions must not be allowed on the grounds of religious slaughter.** The cut **must** (not 'should') transect both the carotid arteries and both the jugular veins.'

Submitted on 5th May 2013 by the Executive of Sentient, The Veterinary Institute for Animal Ethics:

Dr Katherine van Ekert, President
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