

Australian Animal Welfare Standards and Guidelines for Sheep Public Consultation

Submission from the Victorian Farmers Federation

I write on behalf of the Victorian Farmers Federation (VFF) to provide feedback regarding the Australian Animal Welfare Standards and Guidelines for Sheep.

The VFF recognises the importance of the objectives of the Standards and Guidelines, to protect and maintain the welfare of sheep in Australia, and to harmonise regulations across state jurisdictions.

From the options considered in the RIS, we support the Australian Animal Welfare Standards and Guidelines for Sheep as drafted - *Option B*, but with the inclusion of Variation C6: *Require docked tails to have a least one free palpable joint.*

Through public consultation, sentiment directed to our council from Victorian sheep producers indicates that requiring a minimum of two free palpable joints would cause concern. Issues arising from a requirement of two joints include:

- Concern that accurately tail docking to two joints is difficult to replicate
- Production preference for some producers for one joint for several reasons, including to lessen time and stress at crutching

We believe this will be of no detriment to animal welfare and this is supported by the RIS which documents that there is no variation in welfare benefit between tail docking at either one, two or three joints.

The VFF also has further concerns regarding the implementation of the Animal Welfare Standards and Guidelines.

We are concerned that any benefit obtained through replacing the current Model Codes of Practice with Standards and Guidelines will be of limited assistance if state regulators are unable to provide adequate funds to enforce the standards.

Another concern we hold relating to the public consultation period is the credence extended to pro forma submissions created by animal rights groups. We are aware of campaigns by groups such as Animals Australia that encourage the public to submit feedback to the Sheep Standards and Guidelines Writing Group. While we embrace public input, this campaign is utilising highly emotive and often misleading statements such as “animals can have parts of their bodies cut off without pain relief”, and the simplicity of a pro forma letter to attempt to sway this process unjustly. Accordingly, we ask that you place significantly less consideration on such submissions.

I trust this feedback is of assistance and please don't hesitate to contact me if you have any further questions regarding this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read "Ian Feldtmann". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ian Feldtmann
President VFF Livestock Group