



# The Western Australian Farmers' Federation Inc.

Wool and Meat Section

Submission to the

## Australian Animal Welfare Standards and Guidelines Sheep

Edition One

Public Consultation Version 1.0

21 February 2013

Standing Council of Primary Industries

**Due: 5 August 2013 Ref W087**

**Submitted to:**

Animal Welfare Standards Public Consultation

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## WAFARMERS BACKGROUND

The Western Australian Farmers Federation (Inc.) (WAFarmers) is the State's largest and most influential rural lobby and service organisation. WAFarmers represents approximately 4,000 Western Australian farmers from primary industries including grain growers, meat and wool producers, horticulturalists, dairy farmers, commercial egg producers and beekeepers. Collectively our members are major contributors to the \$5.5 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental wellbeing of that land.

## INTRODUCTION

WAFarmers welcomes the opportunity to comment on the Australian Animal Welfare Standards and Guidelines (S&G) – Sheep Public Document. It is our understanding that the S&G replace the the *Model Code of Practice for the Welfare of Animals – The Sheep, PISC/SCRAM Report Series 89, CSIRO Publishing, 1991 (revised 2006)*.

WAFarmers has been involved in the development of the Standards and Guidelines through its national peak bodies Sheepmeat Council of Australia and WoolProducers Australia. WAFarmers has also had the opportunity to provide feedback to the “Review of the Animal Welfare Standards and Guidelines Development Process” undertaken by PricewaterhouseCoopers Australia (PwC).

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| <p>1. WAFarmers would welcome a copy of the outcomes from the “Review of the Animal Welfare Standards and Guidelines Development Process” undertaken by PricewaterhouseCoopers Australia.</p> |
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WAFarmers made its first submission on this document on 6<sup>th</sup> May 2013 during the initial 30 days public consultation period. WAFarmers welcomed the additional 90 day consultation period. This copy supersedes the previous submission. The time has allowed the organisation to review and consult with our membership on the Standards and Guidelines.

The Government initiative that guides the development of new, nationally consistent policies to improve animal welfare arrangements in all Australian States and Territories is commendable. However, there is real concern that the Standards will not lead to consistent legislation in each State.

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| <p>2. WAFarmers would like a commitment from the Standing Council on Primary Industries (all Agriculture Ministers in Australia) to ensure that legislation in each jurisdiction is implemented reflecting the standards in a uniform manner together with compliance and implementation.</p> |
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| <p>3. WAFarmers seek a commitment from the State Minister for Agriculture and Food, The Hon Ken Baston that the State Regulator will engage with industry in the implementation process.</p> |
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4. WAFarmers believes that the word *“immediately”* in Guideline G.3.3 *“Sheep that appear to be isolated from the flock, caught in structures or bogged, should be inspected immediately and appropriate action taken”* is impractical. The word *“immediately”* should be replaced with *“as soon as practicable”*.
5. WAFarmers Guideline G3.13 *“Sheep should be vaccinated against relevant diseases”* should be deleted. Does this mean that every producer must vaccinate against any and all known diseases?
6. WAFarmers believes that Standard S5.3 *“A person in charge must ensure a sheep is shorn before the wool reaches 250 mm in length”* must be altered. WAFarmers does not support this statement. There are some breeds of sheep that grow that amount of wool in one season, and unless there is a great deal of science backing the 250mm in length rule, the words should be changed to *“a person in charge must ensure a sheep is shorn at a time that is appropriate for its breed”*. Guideline G5.22 *“Sheep that grow and retain long wool should be shorn annually”* needs to be removed, altered or deleted for above mentioned reasons.
7. WAFarmers opposes Standard S5.5 – *“A person must not trim or grind the teeth of sheep. Producers use this management tool to allow animals to eat more effectively, therefore, looking after their welfare.*
8. WAFarmers supports Standard S5.7 *“a person in charge must ensure that tethered sheep are able to exercise daily”*.
9. WAFarmers believes that Guideline G5.1 *“Sheep should be handled to take advantage of their natural flocking behaviour when mustering, yarding and handling. People handling sheep should have an understanding of the flight zone”* is a motherhood statement and should be deleted.
10. WAFarmers believes that Standard S6.2 – *“A person must not \*tail dock\* sheep that are more than six months old without using \*pain relief\* and haemorrhage”* needs to be converted into a Guideline as currently there is no pain relief registered for tail docking sheep in Australia. The wording of *“no permanent teeth”* should replace *“six months old”* be included in the statement on the grounds of practicability.
11. WAFarmers believes that Standard S6.4 – *“A person must not \*castrate\* or use the cryptorchid method on sheep that are more than six months old without using \*pain relief\* and haemorrhage control”* must be a Guideline only as there is currently no registered pain relief for the castration of sheep in Australia. The wording of *“no permanent teeth”* should replace *“six months old”* on the grounds of practicability.
12. WAFarmers believes that Standard S7.2 *“A person must not \*mules\* sheep that are less than 24 hours old or more than 12 months old”* should have the following words added to it *“except in exceptional circumstances”*.

13. WAFarmers does not support mandatory use of pain relief. Standard S7.3 “A person must not *\*mules\** sheep that are 6-12 months old without using *\*pain relief\**” should be deleted as a Standard and will be covered by the existing Guideline which reads G7.8 “*Mulesing should be accompanied by pain relief where practical and cost-effective methods are available. Operators should seek advice on current pain minimisation strategies*”.

14. WAFarmers believes that Guideline G9.10 “*Sheep should be grouped with others that they are already familiar with, and of the same class*” is a motherhood statement and should be deleted.

15. WAFarmers believes that Standard S10.5 “*A person killing a lamb by a blow to the forehead must ensure that the lamb weighs less than 10 kg*” needs to be deleted as a Standard. This proposed Standard is already covered by S10.1 – S10.4. Also, it is impractical to have the means to weigh an animal in a paddock situation in determining its weight.

16. WAFarmers believes that Standard S10.6 – “*A person must only use *\*bleeding-out\** by neck cut to kill a conscious sheep when there is no firearm, captive bolt or lethal injection reasonably available*” should be a Guideline only.

### **I. Pain relief for all mulesing**

17. WAFarmers DOES NOT support mandatory use of pain relief when mulesing. This option should be encouraged but must be voluntary. The Regulation Impact Statement (RIS) clearly shows that variation C1 would entail the highest quantifiable costs standing at \$32.28 million dollars to the industry over a 10 year period. This would also be against point two of the four main decision making principles used for standards “*feasible for industry and government*”. The statement in relation to pain relief could be made into a Guideline as is the case with tail docking and castration in G6.14 “*Tail docking and castration should be accompanied by pain relief when practical and cost-effective methods become available. Operators should seek advice on current pain minimisation strategies.*”

### **II. Mulesing age restricted to less than six months**

18. WAFarmers feels that mulesing age being restricted to less than six months is not practical in the case of delays and stragglers and would better read “*sheep with no permanent teeth*”. The document should be amended to state that restriction of mulesing age should be to sheep showing “*no permanent teeth*”. This variation is very impractical as it is difficult in some instances to determine the age of a sheep at 6 months of age.

### **III. Pain relief for laparoscopic artificial insemination and embryo transfer**

19. WAFarmers DOES NOT support the mandatory use of pain relief for laparoscopic artificial insemination and embryo transfer. This option should be encouraged through the Guidelines.

**IV. Docked tails to have at least one free palpable joint**

20. WAFarmers supports docked tails to have at least one or two free palpable joints.

**V. Banning single penning for wool production**

21. WAFarmers DOES not support banning single penning of sheep. WAFarmers supports Guideline G5.3 *“sheep should be restrained and isolated for the minimum time necessary and G9.18 “Intensive systems should have hospital pens for sick or injured sheep.”* Single penning is used for shows, stud breeding etc.

**VI. Banning tethering**

22. WAFarmers supports tethering and believes that the proposed banning of tethering is impractical ie. tethering an animal to keep it separate from others when unwell or tethering an animal that is a pet in the backyard.

23. Although the Animal Welfare Standards and Guidelines Development Business Plan stipulates that the Guidelines remain voluntary, what assurance is there that they will not be used by the prosecuting body to enforce a Standard?

24. It is imperative, that unless the Standard (and some cases Guideline) (when being specific in statement) can be underpinned by science that they should not be included in the document.

WAFarmers welcomes the opportunity to provide any further detail on our submission should it be required.