

DRAFT AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES –
SHEEP

RESPONSE TO THE STANDARDS AND GUIDELINES AND REGULATION
IMPACT STATEMENT

WOOLPRODUCERS AUSTRALIA

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INTRODUCTION

WoolProducers Australia (WPA) is the peak national body for the wool industry in Australia and represents over 14,000 farmers whose primary business is growing wool. We are the national voice for producers, advocating their interests to both the Federal Government and internationally.

Wool growers hold membership of WPA either directly or through membership of their State farming organisation.

WPA has been closely involved with the development of the Standards and Guidelines as a member of both the Standards Reference Group and the Writing Group. WPA is supportive of the process to revise existing Model Codes of Practice into Standards and Guidelines, with the Standards to be implemented consistently through State and Territory legislation.

OVERVIEW OF POSITION

WPA supports the adoption of national Standards as mandatory underpinned by unenforceable Guidelines.

WPA supports the Standards with some amendments as proposed in Edition 1, Public Consultation Version 1.0 of the Australian Animal Welfare Standards and Guidelines – Sheep.

WPA supports the following Standards as proposed:

Responsibilities

S1.1

Feed and Water

S2.1

Risk Management of Extreme Weather, Natural Disasters, Disease, Injury and Predation

S3.1; S3.2; S3.3

Facilities and Equipment

S4.1

Handling and Husbandry

S5.2; S5.4; S5.5; S5.6; S5.7

Tail Docking and Castration

S6.1; WPA supports C6 to replace proposed S6.3

Mulesing

S7.1; S7.2; S7.3; S7.4; S7.5

Breeding Management

S8.1; S8.2

Intensive Sheep Production Systems

S9.1; S9.2; S9.3; S9.4; S9.5; S9.6; S9.7

Humane Killing

S10.1; S10.2; S10.3; S10.4

WPA proposes amendments to S5.1 and S5.3 as currently proposed, as described below.

WPA also proposes the **conversion of parts of S5.1 and entire S6.2 and S6.4 to Guidelines** and the removal of **S10.5 and S10.6** as described below, as the intent of Standards are to deliver adequate welfare outcomes, rather than prescribing the exact actions that must be followed to achieve the outcomes.

DETAILED RESPONSE TO THE STANDARDS AND GUIDELINES AND RIS

WPA remain committed to this process in good faith that state and territory jurisdictions will honour their commitment and obligation under this process to achieve greater animal welfare outcomes – if it becomes apparent that other stakeholders are not delivering on their commitments we will reconsider our position and/or support.

WPA has not provided comment on the Guidelines in this submission as the organisation has prioritised the need to focus more on regulatory outcomes, i.e. Standards. WPA is comfortable in this approach provided that the definition and intent of the Guidelines remain unchanged from the definition provided in the Business Plan for the ‘Development of Australian Standards and Guidelines for the Welfare of Livestock’:

Guidelines — the recommended practices to achieve desirable animal welfare outcomes. The guidelines complement the standards. They should be used as guidance. Guidelines use the word ‘should’. Noncompliance with one or more guidelines will not in itself constitute an offence under law.

As a member of the Standards Reference and Writing Groups, WPA has provided input to the content of the draft Standards and Guidelines. It has presented arguments based upon science, industry knowledge and practice on a number of the issues canvassed in the document and acknowledges that those issues have been thoroughly debated by the parties.

For the record, WPA wishes to note a small number of amendments to the current draft that would improve the effectiveness of the document in delivering improved welfare outcomes for sheep in Australia.

The premise of WPA’s submission is that the organisation believes that the Standards should be written in a way that achieves better animal welfare outcomes for sheep at a holistic level, negating the need to prescribe how the adequate welfare outcome is achieved.

HANDLING AND HUSBANDRY

S5.1 A person must handle sheep in a reasonable manner and must not:

- 1) *lift* off the ground by only one leg, or by the head, ears, horns, neck, tail or wool, unless in an *emergency* ; or
- 2) throw or drop, except to land on its feet from a height less than one metre; or
- 3) strike in an unreasonable manner, punch or kick; or
- 4) drag sheep that are not standing by only one leg, except in an emergency to allow safe handling, *lifting* , treatment or humane killing; or
- 5) drag by the ears, tail, or wool; or
- 6) drag by mechanical means, except in an *emergency* , for the minimum distance to allow safe handling, *lifting* , treatment or humane killing.

WPA position: WPA believes that this proposed Standard should be amended to read:

S5.1 A person must handle sheep in a reasonable manner.

WPA believes that the remainder of the proposed Standard should be converted to a Guideline. As a Standard it is made redundant by the presence of S1.1 and indeed by existing Prevention of Cruelty to Animals or equivalent legislation in each State/Territory because each action listed is self-evidently unacceptable welfare practice. The inclusion of this proposed S5.1 suggests that the practices described are commonplace when in fact they are not.

Further, the Standard provides an incomplete list of the abusive practices that might be contemplated by an unreasonable person. The risk in explicitly specifying a list of banned practices is that any practice *not* on the list may be implicitly regarded as acceptable. Guidelines, as distinct from Standards, retain their validity in providing examples rather than complete lists of acceptable or unacceptable practices.

S5.3 A person in charge must ensure a sheep is shorn before the wool reaches 250 mm in length.

WPA position: WPA believes that this proposed Standard should be amended to read:

S5.3 A person in charge must ensure that a sheep is shorn at intervals appropriate to its breed and production system.

There is no scientific evidence that supports the appropriate frequency or length of wool for harvesting. This was reinforced in the development process of this Standard when there was deliberation if this Standard should be based on a length of time or the length of wool – there was no research to support either approach.

It is general practice to shear sheep that grow and retain wool on an annual basis, however given the varied production and enterprise systems across Australia, coupled with external

factors such as climatic conditions, it is impossible to impose a general Standard for optimum wool harvesting frequency.

The proposed amended Standard allows for flexibility for individual producers and is consistent in approach to S3.2 in achieving welfare outcomes appropriate to risks associated with individual production systems.

RIS proposed Variation C4: Ban on tethering.

S5.7 A person in charge must ensure that tethered sheep are able to exercise daily.

WPA position: WPA supports the current proposed wording of S5.7. It does not support RIS Variation C4, on the grounds that S5.7 provides for the amelioration of any adverse welfare effects of tethering.

TAIL DOCKING AND CASTRATION

S6.2 A person must not *tail dock* sheep that are more than six months old without using *pain relief* and haemorrhage control.

WPA position: WPA believes that this Standard should be a Guideline only. The requirement for pain relief makes this a redundant Standard given that there is no non-prescription pain relief registered for tail docking sheep in Australia currently. The lack of drug registration for sheep precludes the practical application of Non Steroidal Anti-Inflammatory Drugs (NSAIDs) and other analgesic drugs.

Additionally, whilst the vast majority of tail docking of lambs is done before 6 months of age, this Standard does not allow the flexibility that is required when there are external factors such as adverse climatic conditions that may inhibit the practice before the upper age limit.

RIS proposed Variation C6: Require docked tails to have at least one free palpable joint

S6.3 A person must leave a docked tail stump of a sheep with at least two *palpable free joints* remaining.

WPA position: WPA would prefer that S6.3 be amended as proposed in Variation C6 of the RIS, i.e. with the requirement for at least one rather than two palpable joints in docked tails.

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.

WPA position: WPA believes that this Standard should be a Guideline only. The requirement for pain relief makes this a redundant Standard given that there is no non-prescription pain relief registered for the castration of sheep in Australia currently. The lack of drug registration for sheep precludes the practical application of Non Steroidal Anti-Inflammatory Drugs (NSAIDs) and other analgesic drugs.

MULESING

RIS proposed Variation C2: Restriction of mulesing age to less than 6 months.

S7.2 A person must not *mules* sheep that are less than 24 hours old or more than 12 months old.

WPA position: WPA supports the current proposed wording of S7.2. It does not support RIS Variation C2. It provides no flexibility for the small proportion of producers who, due to genuine external constraints such as incomplete musters in pastoral areas or seasonal conditions resulting in a heavy fly attack, cannot safely mules all lambs before the age of 6 months. There is a risk that prescribing an upper age limit of 6 months will inadvertently cause some producers to be in breach of S7.4, 'A person must not *mules* sheep showing signs of debilitating disease, weakness or ill-thrift'. S7.3, which prescribes pain relief for sheep mulesed between the ages of 6 and 12 months, ensures any mulesing carried out between these ages is conducted in as pain-free a manner as possible.

RIS proposed Variation C1: Pain relief for all mulesing.

S7.3 A person must not *mules* sheep that are 6–12 months old without using *pain relief*.

WPA position: WPA supports the current proposed wording of S7.3. It does not support RIS Variation C1. There is only one product available to provide pain relief for mulesing (Tri-Solfen®). It is scheduled S4 and may therefore only be used under the supervision of a veterinary surgeon. Such supervision is not practical in all circumstances. WPA fully supports and anticipates the development of a broader range of pain relief options for mulesing and other procedures and will actively promote their adoption as they become available.

BREEDING MANAGEMENT

RIS proposed Variation C5: Mandatory pain relief for all laparoscopic artificial insemination and embryo transfer.

S8.1 A person performing artificial breeding procedures on sheep must not cause unreasonable pain, distress or injury to sheep.

WPA position: WPA supports the current proposed wording of S8.1. It does not support RIS Variation C5. WPA believes that the current wording of S8.1, in conjunction with S8.2 ('A person must be a veterinarian, or operating under veterinary *supervision*, to perform surgical embryo transfer and laparoscopic insemination of sheep'), ensures that appropriate consideration is provided to the welfare of ewes subject to laparoscopic artificial insemination or embryo transfer.

INTENSIVE SHEEP PRODUCTION SYSTEMS

RIS proposed Variation C3: Ban on single penning.

S9.7 A person in charge must ensure a sheep housed in a single pen for fine wool production is able to turn around, see, hear, smell and touch neighbouring sheep.

WPA position: WPA supports the current proposed wording of S9.7. It does not support RIS Variation C3, on the grounds that S9.7 as currently worded provides for the amelioration of any adverse welfare effects of single penning.

HUMANE KILLING

S10.5 A person killing a lamb by a blow to the forehead must ensure that the lamb weighs less than 10 kilograms.

WPA position: WPA believes that this proposed Standard should be removed. The stated welfare objective where humane killing is necessitated, that is 'Where it is necessary to kill sheep, it is done promptly, safely and humanely' – is achieved through S10.1 – S10.5. Stipulation of how the objective is to be achieved (such as in the proposed S10.5, and also 10.6 – see below) may unnecessarily limit the options of persons across a broad range of circumstances that are difficult to foresee.

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.

WPA position: WPA believes that this proposed Standard should be removed, as argued for S10.5 above.