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30th April, 2013

To Whom It May Concern:

Re: Public Consultation on the draft Australian Animal Welfare Standards and Guidelines for Cattle and Sheep

On behalf of our 60,000 Australian supporters, Humane Society International (HSI) appreciates the opportunity to make a submission to Animal Health Australia on the draft Australian Animal Welfare Standards and Guidelines for Cattle and Sheep. HSI is not in a position to comment on every aspect of the Standards and Guidelines, however, we offer the comments below which we trust will be considered and contribute towards the improved welfare of farm animals in Australia.

PAIN RELIEF

Our main area of direct concern to sheep and cattle welfare is in relation to painful husbandry procedures.

HSI is opposed to any invasive surgical treatment of animals performed without pain relief. HSI is also opposed to any surgical treatments of animals where the ultimate benefit is measured in convenience to the stock owner and handlers. The welfare of the animal must dictate the decisive outcome and that it be adequately reflected in the Standards.

All major surgical procedures will inflict immense pain on the animal treated. It is reasonable therefore to insist that any person performing such an operation have the relevant knowledge, experience and skills necessary or accreditation, as stipulated in the Standards, to ensure the welfare of the animal being treated and that the competency of the operator has been validated.

Invasive surgical procedures, that are currently required to be carried out by a veterinarian, must remain so to ensure that pain for the animal is minimal and managed by someone qualified to do so.

Requirements for pain relief and the need for the services of a veterinarian will also serve to protect the welfare of sheep and cattle by keeping stock-people mindful of the need to perform the procedure with appropriate care.

In relation to pain relief, Variation C1 across both the sheep and cattle standards must be adopted:

- *Variation C1*: All mulesing with pain relief
- *Variation C1*: pain relief for all spaying

and Variation C5 for sheep only:

- *Variation C5*: Mandate pain relief for laparoscopic LAI and ET

TRAINING

A person must have the knowledge, experience and skills to perform many husbandry and invasive surgical procedures and tasks set out in the Standards of proposed review of the Model Code of Practice (MCOP) yet in many instances there is no requirement for the formal assessment of such skills. Training should be expected to play a much greater role in verifying better animal welfare outcomes and is critical to the welfare of all farmed livestock.

Australian farm hands are charged with the responsibility of numerous invasive surgical treatments on animals, many just learning as they go from other workers that have not received any formal training and are frequently ignorant of any regulations or guidelines that may be in place in regard to the procedures they are performing, and in many instances even unaware that a Code of Practice exists.

“A person must have knowledge, experience and skills to perform a general husbandry task in a manner that minimises the risk to the welfare of animals”. This statement is repeated for most surgical procedures in the proposed Standards. For such Standards to be effective and verifiable there must be a system of assessment and record of training in place to prove compliance.

The focus of any assessment of training for stockpersons or farm hands should be competency based to demonstrate that adequate experience, knowledge and level of skill have been achieved.

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We are seeking consistency in all Standards for the welfare of livestock. The legislation of Standards for the pork industry and the Land Transport of Animals has seen the development of industry skill sets that address animal welfare requirements giving these sectors a robust system for verification of competency of stockmanship and this should be delivered across all classes of livestock.

The responsibilities of the stock handler must be better defined within the Standards to ensure accountability. Whilst the *Consultation Regulation Impact Statement* defines a ‘person in charge’ as; “*the person who is responsible for the welfare of the livestock at a particular time. Responsibility for duty of care for livestock welfare may extend to the person’s employer*”, no such definition is supplied in the glossary of terms in the proposed Standards and Guidelines.

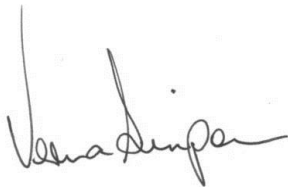
In order for the proposed Standards to be robust they must be verifiable and auditable, and without a framework to determine compliance to requirements for knowledge, experience and skill of those working with livestock and impacting on their welfare the proposed Standards lack credibility.

REGULATED STANDARDS

The proposed Standards on their own lack any real improvements for the welfare of sheep and cattle in Australia. These Standards do not provide clear instruction that every person that is involved with the handling and husbandry of any sheep or cattle is accountable for their actions in relation to that animal.

The inclusion of the Guidelines into regulated Standards would provide a much more robust Animal Welfare Standard that would go a long way towards withstanding both the current public and international scrutiny of Australia’s animal farming practices. This is an opportunity that has sadly been missed.

Yours Sincerely,



Verna Simpson
Director
Humane Society International