

Submission
No 2

**INQUIRY INTO PREVENTION OF CRUELTY TO ANIMALS
AMENDMENT (RESTRICTIONS ON STOCK ANIMAL
PROCEDURES) BILL 2019**

Organisation: Australian Wool Growers Association (AWGA)

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Submission to Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019

PREPARED BY THE AUSTRALIAN WOOL GROWERS ASSOCIATION (AWGA)

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About the Australian Wool Growers Association

The AWGA is an independent woolgrower body, that represents the voice of woolgrowers throughout Australia.

We are a member of the Australian Wool Innovation Ltd, Wool Industry Consulting Committee (WICC) that helps set wool industry strategic planning and policy.

AWGA is a member of the Wool Producers Animal Health and Welfare Advisory Committee, directing the board of Wool Producers in making sound policy and investments on behalf of industry in the areas of animal health, welfare, and biosecurity.

Member trained in Nepal in conjunction with the UNFAO and Wool Producers Australia in Foot and Mouth Disease (FMD).

We are passionate about the future of Australian wool, protecting the interests of wool growers and promoting best animal welfare practices.

Our webpage is at www.australianwoolgrowers.com.



Submission

The AWGA welcomes this Inquiry and the Committee's work to examine important animal welfare matters. As an industry body that represents wool growers' interests, our submission will focus on the need to continue the practice of mulesing lambs – for both the animal and farmer's benefit.

AWGA strongly opposes any ban on mulesing but welcomes wider usage of pain relief and potentially mandating the use of pain relief in NSW.

Introduction

Mulesing is a brief once in a lifetime surgical procedure performed on lambs to provide them with lifetime protection from flystrike. The procedure takes approximately 30 seconds and involves removing folds of breech skin, to then allow new bare skin to grow and dramatically reduce the risk of flystrike in sheep.

The procedure has been proven highly effective at preventing breech flystrike, allowing sheep with skin wrinkle to continue growing a maximum amount of high crimping wool. Without such an available operation, sheep have increased dag retention, require more frequent crutching and chemical flystrike prevention, with an increased animal welfare burden of skin loss at crutching.

Without surgical mulesing, it has been estimated that a ban on mulesing would lead to an increased annual burden of 7 million sheep with flystrike and the painful death of a million Australian sheep from just one large fly wave season.

This year, a CSIRO study found “unmulesed Merino sheep have a 6-fold increased risk of breech strike compared with mulesed sheep under the same conditions.” ([CSIRO, 2020](#))

The History of Mulesing & Animal Rights

The practice of mulesing in Australia gained particular prominence in 2004 when American fashion retailer *Abercrombie and Fitch* announced they would ban the use of Australian wool because of mulesing. Further, international animal rights groups began campaigning on the issue of mulesing, launching a highly public campaign against EU clothing giant Benetton over mulesing and live exports. Since then, over 20 major fashion retail chains have banned Australian wool because of mulesing and live export issues.

Some animal rights groups are driven by radical ideals to end all types of animal farming.

They know that without mulesing, the Australian merino industry would not be able to survive.

Relying on heavy use of pesticides to control flies is not a feasible alternative. The environmental consequences could be disastrous and is not in any way an alternative to the simplicity of surgical breech skin removal.

Currently, on many farms, mulesing of lambs is a more welfare-appropriate and sustainable intervention than regular removal of dags at crutching and increasing the dependence on insecticide treatment or increased outbreaks of flystrike. Provision of pain relief should enable mulesing to continue on properties, where the sheep genotype requires it.



Recommendations

The AWGA strongly opposes banning the practice of mulesing. Any ban would have far-reaching and detrimental consequences for the Australian wool industry and for the health and welfare of millions of Australian sheep.

Australia is one of the world's largest quality wool producers. Banning an important procedure used by farmers to look after their sheep and their livelihoods would be devastating for farming communities in NSW.

Australian wool growers care about their animals. Mulesing is about protecting the long-term quality of life of a sheep. Wool growers understand husbandry procedures, such as mulesing, can cause short-term pain. This is why 80% of mulesed lambs receive pain relief when undergoing the procedure. This pain relief is administered voluntarily by farmers at their own cost.

AWGA supports mandating the use of pain relief for mulesing and other animal husbandry procedures. It is estimated that 80% of mulesed lambs already receive pain relief in NSW, so it would be of minimal imposition that the remainder of producers be required to use such pain management for surgeries. The registered pain relief options available to farmers are cost-effective.

From July 1 of this year, pain relief has been mandatory in Victoria for mulesing. The new requirements have been well-received by Victorian farmers and we anticipate NSW farmers would respond with equal enthusiasm to promote best practice animal welfare outcomes.

Any mandated pain management would also enhance the reputation of Australian sheep farmers in lucrative EU fashion markets.

There are clear commercial benefits for farmers to use pain relief. Recent AWEX data shows wool from Australian sheep mulesed without pain relief is more likely to be passed-in under grower auction reserves than fleece from animals treated more humanely or from sheep that genetically do not require being mulesed. (Source: [Sheep Central, 20 May 2020](#))

NSW parliament should kindly consider amending the bill by striking out the first part of the bill to ban mulesing by 2022 totally. It then could be amended to mandate pain relief, as per the Victorian legislation.

Conclusion

Wool growers are passionate about animal welfare. As 80% of lambs are now mulesed with pain relief, there is a clear willingness of Australian farmers to do the right thing by their animals.

With no current feasible alternatives to mulesing, this practice must be allowed to continue to prevent flystrike in sheep and protect the lives of the sheep and the viability of wool growers' operations throughout NSW.



Contact

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References and Supporting Papers

Australian Veterinary Association support of mulesing plus pain relief

<https://www.ava.com.au/policy-advocacy/policies/sheep-and-goat-health-and-welfare/surgical-mulesing/>

Horton B. J., Corkrey R., Smith J., Greeff J., Karlsson L. J. E. (2020) Modelling of breech strike risk and protective efficacy of mulesing in adult Merino sheep. *Animal Production Science* 60, 1051-1060.

<https://www.publish.csiro.au/AN/AN18488?jid=ANv60n8&xhtml=0E6C0DD1-9A22-443C-8C4C-2D94C272E4C9>

Sydney University published papers on the use of pain relief with sheep surgery

<https://www.dropbox.com/s/dnhe3ucw2h89mw7/SRR%20mulesing%20welfare.pdf?dl=0>

<https://www.dropbox.com/s/0kta298p3qr0jw1/Lomax%20et%20al%20SRR.pdf?dl=0>

Breeding Merinos for less breech strike

<https://www.dpi.nsw.gov.au/animals-and-livestock/sheep/health/external-parasites/less-breech>

Australian Government Sheep welfare standards and support of mulesing

<http://www.animalwelfarestandards.net.au/files/2011/05/Sheep-Mulesing-discussion-paper-5.3.13.pdf>

Pain studies and management for mulesing

<https://www.dropbox.com/s/m27fn0fga45pomm/avj12031.pdf?dl=0>

AWGA Chairman, Robert McBride, discusses mulesing

<https://medicaethics.me/multimedia/rob-mcbride-talks-about-tri-solfen-and-his-lambs/>