

Submission  
No 5

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

**Organisation:** Animal Liberation NSW

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## **Inquiry into the Prevention of Cruelty to Animals Amendment Bill**

**I SUPPORT the amendment, (Restrictions on Stock Animal Procedures) Bill 2019, to outlaw mulesing by 2022 and provide mandatory pain relief during procedures. In the meantime, I support the assurance that sheep be provided pain relief during mulesing.**

On behalf of Animal Liberation NSW, I wish to extend our gratitude for permitting us to present a submission into the above inquiry.

Australian consumers are becoming increasingly more vocal about their opposition to cruelty to animals. What industry benignly calls “procedures,” consumers here and around the world are referring to as “mutilations”. These practices are currently commonplace across the board in the farming of animals. They are designed and implemented in order to force the animal to fit the system in a way that is most convenient and lucrative to producers. Mulesing is one such mutilation.

*“Humanity's true moral test, its fundamental test...consists of its attitude towards those who are at its mercy: animals.”*

- Milan Kundera, playwright, essayist, and poet

## Mulesing: A Brief History

The practice of mulesing was named after John W.H. Mules who accidentally cut the skin from the hind end of a ewe during shearing. Noticing the ewe did not subsequently suffer from flystrike, he started crutching all his sheep. Mulesing was approved by the Australian Government for use in the 1930s.

In July 2009, representatives of the Australian wool industry revoked an earlier promise, made in November 2004, to phase out the practice of mulesing in Australia by 31 December 2010 [1].

## Mulesing Bans

All major wool-exporting countries, including South Africa, Uruguay and Argentina — with the exception of Australia, the world's largest merino wool producer — have banned mulesing. This leaves Australia as the last country in the world to continue this mutilation procedure on lambs [2].

In 2007, New Zealand began phasing out mulesing due to consumer and animal welfare protests. Initially, the New Zealand Wool growers resisted, but have since come to see this presents their industry with a greater position with which to sell their wool and wool-based products overseas. Additionally, it has created a stabilisation in wool prices. By 1 October 2018, mulesing was officially banned [3].

On 1st July 2020, a ban on mulesing without pain relief came into effect in Victoria. The new provisions made pain relief when practicing mulesing mandatory. A Victorian sheep producer can now receive infringement notices and fines of more than \$3,300 if sheep are mulesed with out pain relief. Feedback from Victorian members, farmers and industry commentators has been extremely positive. Victorian Farmers Federation (VFF) Livestock Group President, Len Vallance, has said that more than 90 per cent of Victorian farmers used pain relief already [4].

## Animals Experience Pain

Mulesing involves cutting the flaps of skin and muscle from a lamb's breech with a hot blade or sharp knife. Studies have found that the pain can last from 48 hours to several weeks. Observations show most lambs socialise less, lose weight in the first two weeks and exhibit behaviours that indicate pain, such as hunched standing, reduced feeding and a reluctance to lay down. It can affect their gait and growth for up to three weeks post-procedure. Lambs also actively avoid humans, particularly the person who carried out the procedure, for up to 5 weeks post-mulesing. The wound takes approximately 5 to 7 weeks to heal. During this time, the open wound is prone to flystrike and infections – *the exact opposite* of what it is inflicted to achieve [5].

A recent national survey showed that 96% of producers mules at marking (castration, ear marking and tail docking). *Tail docking* involves cutting through their tails, which are made of bone and muscle. The pain is extreme and will continue for weeks. If a lamb's tail is cut too short, they are at higher risk of suffering from serious health complications, such as rectal prolapse. Another way to remove tails is using a rubber ring to constrict blood vessels until tails drop off. Both of these cause intense and prolonged suffering.

Every year, between 31 and 34 million lambs in Australia undergo these routine mutilations. Although these procedures are known to cause acute pain and stress, they are routinely conducted without analgesia. Despite their justification for animal health, production and management reasons, there is growing concern for the welfare of animals undergoing these procedures. In the European Union, for example, some countries have passed legislation banning piglet or lamb castration unless analgesia is used. In other countries, supermarket chains are refusing to sell products from pigs unless they were castrated with analgesia [6].

By not passing this Bill, the NSW government is denying the fact that animals are experiencing severe pain caused by routine procedures.

## Pain Relief

*“If we can't be cordial to these creatures' fleece, I think that we deserve to freeze.”*

- Marianne Moore, Pulitzer Prize-Winning Novelist

Animals experience pain in a similar manner to humans, and thus, pain relief must be made mandatory. Pain relief has been available in Australia, in one form or another, for over a decade. Emeritus Professor Peter Windsor, from the University of Sydney, says “mandatory pain relief is now an essential component of the social licence for the ongoing production of Australian wool” [7].

Two products that are widely used are Tri-Solfen and Buccalgesic.

Tri-Solfen is a topical product applied post-mulesing. It contains two anaesthetics: one fast-acting and the other for prolonged pain. Together, they provide rapid pain relief within one minute and prolonged pain alleviation for at least 24 hours. It also contains adrenaline, which reduces bleeding, shock and stress due to blood loss. Tri-Solfen also promotes wound-healing, as it contains antiseptic, reducing the likelihood of contamination and, therefore, reduces the risk of bacterial infection. [8]

Buccalgesic is a viscous liquid containing the non-steroidal, anti-inflammatory drug meloxicam. It is applied using a drench-like gun applicator into the space between the gum and inside of the cheek of an animal. The active ingredient is effectively absorbed through the buccal mucosa and delivers pain relief within 15-30 minutes, with efficacy lasting 24 hours or longer [9].

Using a combination of the Tri-Solfen and Buccalgesic pain relief products provides more prolonged relief from mulesing than using each of the products on its own.

In 2016, a new injectable pain relief product, Metacam 20, was approved for use in sheep, giving Australian farmers yet another strategy to improve animal welfare standards. This is the first pain relief option that can be administered to animals prior to surgical procedures, such as mulesing, castration, tail-docking and injuries endured during shearing. This method, however, must be prescribed by a veterinarian [10, 11].

Animals should also be given pain relief during the healing process. Adding analgesics, such as Flunixin, to feed and water, makes it easy for farmers to maintain pain relief for the animals. A study found that lambs who received Flunixin voluntarily as a component of their total mixed ration or via an injection, exhibited less pain-related behaviour and had reduced inflammation compared to animals who received no pain relief. There was, however, some residual behaviour and physiological indications that showed some level of pain remained in these animals [12].

Increasing adoption by producers of pain relief for lambs during surgical routine husbandry procedures offers a new welfare-conscious paradigm for the Australian wool industry. This development has potential application to several species undergoing many farmed animal procedures throughout the world and offers a simple part solution to address the increasingly important and emerging global issue of welfare conscious agriculture [13].

## **Fly-Strike**

Fly-strike is a dreadful way for an animal to die. In Australia, the blowfly (*Lucilia cuprina*) can lay maggots in wet, stained wool and open wounds. The maggots bury themselves under wool folds and start feeding off their flesh. Once the larvae develop, flies continue to deposit eggs onto new or already infected sheep, initiating the infection process again. Sheep display symptoms such as agitation, odour and matted wool, all of which further encourage the attraction of flies. Fly-strike can be lethal for sheep due to, among a range of other things, ammonia poisoning.

Sheep suffering from fly-strike are identifiable in a flock by characteristic green or wet-looking patches in the sheep's fleece, usually around the haunches or tail, or at the site of an open wound where wool can create a damper area which is more attractive to flies. In male sheep, the penile region is also a common area for fly-strike to occur [14].

The obvious solution is to breed animals who don't have the wrinkled, high-volume wool of the Merino, an animal who should never have been farmed in the heat of this country. Some farmers are already using a combination of other methods to reduce fly-strike, including:

- breeding plainer bodied sheep (through genetic selection)
- adjusting the timing of shearing and crutching
- using chemical protective applications
- promptly treating struck sheep
- ensuring that tail docking is done correctly
- using pain relief products, as appropriate
- paying attention to worm and dag control [15, 16]

## **Rise in Demand for Non-Mulesed Wool**

Consumers around the world are understandably outraged with this practice and are placing pressure on brands to withdraw support for practices and products that cause such cruelty to animals. This means that Australian Merino wool's dominant position in the luxury fibre market is not guaranteed. No other country has the issue of mulesing hanging over its clip, so

buyers have alternative strategies to choose from – buying from New Zealand, South America and South Africa.

For some Merino wool clothes manufacturers, it is simpler to avoid the animal welfare controversy surrounding mulesing by purchasing their raw material from countries other than Australia, where it is not practiced. These manufacturers comments are reflected across the US and Europe through the US National Retail Federation's September 2012 position paper on mulesing which has 18 organisation signatories. It says in amongst other points:

*We agree that the genetics/breeding programs hold promise as the best alternative to surgical mulesing, particularly with respect to the highest risk factor – breech wrinkle.*

*We also support the efforts by a growing number of merino stud breeders in Australia to produce plainer-bodied rams, with progeny that will be more resistant to fly-strike, yet have good fleece weight and lower wool micron size that growers need [17].*

Additionally, major chainstores, such as Kmart and Target, have also committed to no longer produce or sell any products containing mulesed wool by 2030. International brand H&M banned wool from mulesed sheep more than a decade ago. Other international labels that source from Australian growers are also joining the cause. Woolworths Australasia — which owns David Jones, Country Road, Witchery, Trenery and Politix — has committed to phasing out the use of mulesed wool in its clothing and other products by 2025.

Despite prices in the overall wool market declining, non-mulesed wool is fetching premium prices because of the demand in Europe by retail brands looking for ethically produced wool. This initiative shows that there is pressure on the Australian wool industry to phase out the practice entirely. International farmers, particularly in Italy, are offering higher premiums for un-mulesed wool. As a result, a growing number of wool farmers are opting for a more ethical way of producing wool.

## Concluding Comments

1. **Mulesing must be banned.** Australia is the last remaining country to mutilate lambs in this manner and must urgently follow the example set by other nations. Consumers are also becoming more vocal about the mistreatment of animals and are demanding un-mulesed wool products. This has pressured other countries to look for alternate suppliers, placing both international and national pressure to ban mulesing.
2. **Pain relief must be made mandatory for farmed animals undergoing painful procedures.** The law to provide pre- and post-pain relief has been successful in Victoria. It will, despite current push back by some farmers, be just as successful in NSW. Despite claims of high animal welfare, Australian animals can currently be de-beaked, de-horned or disbudded, castrated, branded, have their teeth clipped, their tails and ears cut all without pain relief. There is a range of clear scientific evidence that proves animals are sentient beings with complex thoughts, feelings and emotions. They experience pain in a similar manner to humans. To minimise an animals pain and discomfort, they must be given analgesic or another form of pain relief before and after any procedure.

## **Additional Comments**

- 1. The proposed Bill should provide detailed and explicit clarification on what procedures involving farmed animals will require pain relief.** As it currently stands, there is not enough information to know what will and will not require pain relief under law. I firmly believe that *all procedures* must require pain relief - not only those currently contained in an unacceptably vague phrase ("certain" procedures) stated in the Bill.
- 2. Animals experience prolonged pain due to these procedures and must be given ongoing treatment.** When pain relief is provided to livestock, it is given at the time of injury and animals are usually not given a follow-up dose as repeated administration of medications is generally considered not feasible within conventional livestock management practices. Only giving one dose, however, may not provide sufficient pain relief for all animals, as like humans, an animal's sensitivity and experience of pain varies. The Bill should, thus, include the need for ongoing pain relief treatment during the healing process to minimise the animals suffering.



*“I want to find a way of speaking to fellow human beings that will be cool rather than heated, philosophical rather than polemical, that will bring enlightenment rather than seeking to divide us into the righteous and the sinners, the saved and the damned, the sheep and the goats.”*

- J.M. Coetzee, Nobel Prize-Winning Author

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