

Submission
No 8

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

Organisation: Humane Society International (HSI)

Date Received: 31 July 2020



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The Director
Portfolio Committee No.4
Parliament House
Macquarie Street
SYDNEY NSW 2000

By email: PortfolioCommittee4@parliament.nsw.gov.au

31 July 2020

Dear Sir or Madam,

RE: SUBMISSION ON THE PREVENTION OF CRUELTY TO ANIMALS AMENDMENT (RESTRICTIONS ON STOCK ANIMAL PROCEDURES) BILL 2019

Humane Society International (HSI) welcomes the opportunity to provide this submission in relation to the *Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019*.

We are the world's largest conservation and animal welfare organisation, with over 10 million supporters, and are leaders in the movements to save wildlife and reduce cruelty to animals. We have more than 25 years of experience in Australia working actively to assist government bodies and agencies to further the protection of animals through appropriate regulations and enforcement.

HSI offers the following comments on behalf of our 70,000 Australian supporters. We are pleased that this inquiry is being conducted and offer our full support for the bill. Our recommendations and associated references are detailed below.

MULESING

Background

Australia's Merino sheep were originally smooth skinned, with no wrinkles or wool on their breech, but Vermont sheep were introduced into Australia in 1883 with folds of skin in an effort to yield more wool. This coincided with the arrival of a new fly species which, when coupled with Australia's warm climate, resulted in a serious condition called 'flystrike' affecting millions of sheep.

HSI seeks to improve the welfare of sheep throughout Australia and promotes welfare-friendly methods of flystrike mitigation through genetics, recommending a shift away from the controversial practice known as 'mulesing'. Both flystrike and mulesing are serious animal welfare issues with significant commercial implications, with the Australian wool and sheep meat industries facing lost production costs in excess of \$200 million per year from flystrike, or breech strike, by the sheep blowfly, *Lucilia cuprina*¹.

US Office:
Washington DC

Regional Offices:
Africa
Canada
Europe
India
Latin America
Mexico
United Kingdom

¹ <https://www.csiro.au/en/Research/AF/Areas/Livestock/Managing-flystrike-and-mulesing-in-sheep>

The parasitic flies are attracted by the moist environment offered at the rear end of the sheep, so they proceed to lay their eggs on the soiled wool and the inviting folds of wrinkled skin. The sheep becomes flystruck when the maggots hatch, burying themselves into the skin and consuming the sheep's flesh. To counteract this problem, the practice of 'mulesing' was developed by Mr John Mules in the 1920s to reduce the incidence of flystrike. Mulesing is a surgical procedure that involves slicing off the breech area and around the tail of a lamb to form scar tissue, thereby eliminating wrinkles there and deeming the area unattractive for the flies. However, the sheep are still vulnerable to being struck in other areas of the body.

Although mulesing is known to be effective in successfully limiting flystrike around the breech area, it is a significant mutilation and painful procedure. As reported by Edwards, the pain is apparent immediately following the procedure and persists for at least 2-3 days, and possibly up to 2 weeks, as reflected by changes in behaviour². A substantial stress response occurs for 1-2 days following mulesing, and an acute phase response occurs for up to 7 days. More recent studies show that the pain can last for several weeks³, and there are reportedly further negative implications such as weight loss post mulesing, reduced socialisation, fear and human avoidance behaviours, with the resulting wound taking 5-7 weeks to completely heal⁴.

One of the most used pain relief products, Tri-Solfen, is only applied post cut, and HSI believes it is inadequate in covering the duration of the pain. We strongly recommend that for woolgrowers who continue to mules their lambs, pain relief should be mandatory both pre and post cut. It would also be problematic to monitor or police the use of mandatory pain relief. While of course pain relief must be mandatory if mulesing is undertaken, mulesing should be phased out.

Growing Evidence

Throughout this campaign, HSI has been working with farmers who have found a solution to a major animal welfare problem – the suffering that is associated with both flystrike and mulesing. In collaboration with FOUR PAWS we commissioned BG Economics to undertake an independent economic study to look at the financial benefits of transitioning to plain-bodied breeds to avoid the need for mulesing. With positive findings from a survey of nearly 100 woolgrowers, we hope the report will give confidence to wool producers and encourage them to consider the transition away from mulesing through better genetic selection. The new report titled *Towards a Non-Mulesed Future* will be launched to the public imminently and we would be delighted to provide the Committee with a copy soon. Some key findings include that over 80 per cent of the woolgrowers surveyed reported that transitioning to plain-bodied sheep is not costly, 84.1 per cent have experienced an increased return on investment, and even more claimed they would recommend it to other woolgrowers.

The Solution

HSI provides specific comments in relation to the phase out of mulesing and strongly supports this legislation change. The practice of mulesing has been considered a 'necessary' invasive procedure, however a humane alternative means this is not the case. Careful genetic selection can be used to breed plain-bodied sheep that do not require mulesing. Not only can they produce mules-free plain-bodied sheep, they can also improve heat, humidity, and cold tolerance, improve productivity and feed conversion efficiency, and more. Without wrinkles, sheep with plain-body types are also easier to shear. This approach has already been adopted by hundreds of farms in Australia, sometimes as rapidly as just three years.

² Edwards, L.E. 2012. 'Lamb mulesing: impact on welfare and alternatives'.

³ Small AH, Marini D, Dyal T et al (2018) A randomised field study evaluating the effectiveness of buccal meloxicam and topical local anaesthetic formulations undergoing surgical mulesing and hot knife tail docking. *Research in Veterinary Science* 118:305-311

⁴ Lephherd ML, Canfield PJ, Hunt GB et al (2011) Wound healing after mulesing and other options for controlling breech flystrike in Merino lambs: Observations on gross and microscopic wound healing. *Australian Veterinary Journal* 89:27-37.

HSI does not support an immediate mulesing ban because traditionally bred Merino sheep with significantly wrinkled skin are highly susceptible to flystrike, and they need protection through humane management practices rather than breech modification. Through careful planning and with guidance and support, the transition towards plain-bodied Merino sheep is an achievable goal for Australian Merino woolgrowers and offers the best solution to end the need for mulesing and mitigate flystrike. We have learnt from woolgrowers who have made the transition that it can be achieved within just two to five years, even for those located in high rainfall areas. Almost 80 per cent of the producers surveyed in the new report I mentioned earlier completed the transition to plain-bodied Merinos within five years, and over 40 per cent within just two years.

Chemical use can also be lessened which is an added advantage given that blowflies are becoming resistant to many of the products that are being used today⁵. It is important to allow producers time to transition to plain-bodied flocks and ensure sustainable change.

The peak industry body, Australian Wool Innovation Limited (AWI), is aware of the genetic solution but for various reasons there has been slow uptake of this technique by many woolgrowers.

Consumers and the market are incentivising the transition away from mulesing to a point, but legislation is required to phase out the practice comprehensively. Mulesing is now banned in all major wool-exporting countries – including New Zealand, South Africa, Uruguay, and Argentina. Numerous major international clothing brands and retailers such as H&M, Abercrombie & Fitch, Timberland, Adidas, Icebreaker and Helly Hansen have agreed to stop producing clothing with mulesed wool. An increasing number of Australian retailers are following their lead, including David Jones, Country Road Group, Kmart Group, Target, and Myer, who have all announced policies to transition away from or phase out the use of mulesed wool entirely. If Australian wool producers continue to resist this change, they risk losing significant market share as wool buyers go elsewhere. However, the market will only incentivise so much change and legislation is required to ensure that community expectations over animal cruelty in wool production are met.

Animal Welfare

The advantages of the solution which utilises genetic selection to breed plain-bodied Merinos are plenty – as well as the fact that mulesing would no longer be necessary, it also almost eliminates the incidence of body strike, offering the sheep whole-body protection from the flies. Also, plain-bodied Merinos are better suited to the environment, thereby coping better during periods of drought or other extreme conditions. Less stress would be endured for lambs during marking, and the risk of infection following mulesing would be removed completely. As you would expect, smooth skinned sheep are easier to shear with less cuts being observed than the more wrinkly types, and lamb survival rates are improved. The report *Towards a Non-Mulesed Future* revealed that over 80 per cent of the woolgrowers surveyed experienced increased lamb growth rates, and lambing percentages also increased significantly.

The RSPCA recently updated its policy on mulesing and flystrike prevention and takes the position that it is unacceptable to continue to breed sheep that are susceptible to flystrike and require mulesing as a result⁶. The RSPCA shares our position that the rapid adoption of breeding solutions must be a priority for the wool industry. Stronger policy settings are urgently needed to provoke a transition away from mulesing through breeding out the wrinkle that makes sheep prone to flystrike, thereby solving both major welfare issues.

⁵ <https://www.stockjournal.com.au/story/6854138/resisting-resistance-in-sheep-treatments/>

⁶ RSPCA Knowledgebase, 'What is flystrike and what is the RSPCA's view on mulesing and flystrike prevention in sheep' 1 May 2019, retrieved from <https://kb.rspca.org.au/knowledge-base/what-is-flystrike-and-what-is-the-rspcas-view-on-mulesing-and-flystrike-prevention-in-sheep/>

PAINFUL PROCEDURES

Animals and pain

HSI supports the mandatory use of pain relief for procedures listed in section 24 of the *Prevention of Cruelty to Animals Act*, including castration, dehorning, branding, earmarking, and tail docking. The level of protection from animal cruelty and pain should not be differentiated depending on the animals' end 'use' in society because for example, the suffering experienced would be just as unacceptable for a dog who is tail docked as it would be for a pig or other species. It follows that the current legislation does not go far enough to protect farm animals from unnecessary pain and distress. HSI suggests that these procedures should be replaced with non-invasive alternatives where possible.

Protection from pain

For occasions where painful procedures are allowed to continue, farm animals should be granted the provision of mandatory pain relief administered both before and after the procedure by a suitably qualified veterinarian.

Public perception

The *Department of Agriculture and Water Resources* commissioned a report named 'Australia's Shifting Mindset on Farm Animal Welfare'⁷, conducted by independent consultancy firm *Futureeye* in 2019, to identify public expectation of farm animal welfare and to help the department understand whether current regulations are perceived to be sufficient. Up to 95 per cent of those surveyed view farm animal welfare to be a concern and view farm animals as sentient. This demonstrates that these issues are of increasing concern to the Australian public, and provisions such as mandatory pain relief and phase outs of mutilations are now well overdue.

HSI hopes that this submission will help bring about the phase out of mulesing and mandatory pain relief for the procedures identified in the bill, significantly progressing the welfare of numerous animals within the state. Please forward any correspondence in relation to this submission by email to .

Yours sincerely,

Georgie Dolphin
Animal Welfare Program Manager
Humane Society International

⁷ <https://spaces.hightail.com/space/FTB2E2os98/files/fi-5d845482-4948-4f86-8be4-ea8aaadf20a5/fv-dad055aa-1b5c-42f7-90b6-64feaf89c7ef/190129%20Commodity%20or%20Sentient%20Being%20-%20Australia's%20Shifting%20Mindset%20on%20Farm%20Animal%20Welfare%20v.%207.0.pdf#pageThumbnail-1>