

Submission
No 9

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

Organisation: Sheep Producers Australia (SPA)

Date Received: 31 July 2020

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

Sheep Producers Australia (SPA) welcomes the opportunity to contribute to the Inquiry being conducted by “Portfolio Committee No. 4 – Industry” (The Committee) on the proposed “Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019” (The Bill).

SPA is the voice on issues that affect Australian sheep production businesses. As the successor entity to Sheepmeat Council of Australia which formed in 1978, SPA is the peak industry organisation for sheep and lamb producers. SPA works daily to enhance the industry’s productivity, profitability and sustainability by representing all producers to industry decision-makers and stakeholders.

SPA makes the following recommendations to the NSW Inquiry:

- 1. Mulesing must be retained;**
- 2. A timeline for the phasing-out of mulesing must not be adopted;**
- 3. Pain relief must not be regulated for the following procedures performed on any livestock: Mulesing; Tail-docking; Castration; and Ear-marking or ear-tagging.**

As the national body representing Australian sheep producers, SPA believes good animal welfare and husbandry practices are integral to the productivity, profitability and sustainability of our industry. We take our responsibilities for animal welfare seriously and are committed to continuous improvement of our animal husbandry practices. We are, and always have been, a supporter of high standards of animal welfare, and for this reason we oppose any proposal to ban mulesing.

SPA appreciates the difficulties the sheep industry has experienced in grappling with mulesing as a procedure. The primary issue is producers being able to deal effectively with flystrike, recognised as a major welfare problem in itself, as well as finding viable alternatives to mulesing. SPA encourages sheep producers to phase out mulesing as soon as practical, however recognises that until this can occur, best practice must be promoted when mulesing, which includes pain relief. The proposed mulesing ban is a misguided and blunt response which would inadvertently result in increased incidences of flystrike as unmulesed sheep are more susceptible to the condition. Therefore, we strongly oppose a mulesing ban as it will result in worse animal welfare outcomes than those achieved by mulesing.

SPA played an integral role in the development of the Australian Animal Welfare Standards and Guidelines for Sheep (The Standards). The Standards provide the basis for developing, implementing and enforcing consistent legislation across Australia, and provide guidance for all people responsible for sheep. The Standards provide producers with the appropriate knowledge to ensure that 'in circumstances where mulesing is necessary for the long-term welfare of the sheep, it is done in a manner that minimises the impact of the procedure.' Importantly, they are based on current scientific knowledge, recommended industry practice and community expectations.

Mulesing is widely used in the sheep industry because it is a very effective form of flystrike protection. As defined in The Standards, it is 'the removal of skin from the breech and/or tail of a sheep using mulesing shears'. By creating a bare area on a sheep's breech, mulesing significantly reduces the accumulation of faecal matter in an animal's wool, thus significantly reducing an animal's susceptibility to flystrike. Mulesing should only be done where there are no alternatives and the procedure results in: benefits to life-time sheep welfare, better flock management and a reduced work (occupational) health and safety risk. The mulesing procedure is undertaken only once in order to provide sheep life protection from flystrike. Banning mulesing would have a significant impact on farmers' ability to manage and reduce the risk of flystrike. It would have devastating consequences and contribute to poorer animal welfare outcomes for millions of sheep in New South Wales.

Furthermore, the proposal to ban mulesing by 1 January 2022 is totally unachievable and unfeasible. This would only provide sheep producers less than 18 months to change their practices and undertake a breeding program to move toward a bare breached flock - something that is not physically possible in the given timeframe. As sheep are only 'joined' once a year, the Bill would expect farmers to make the required genetic change in one generation. The experience of producers and research, both indicate that it takes far longer to fully transition to a 'non-mulesed' farming entity. Estimates vary on the time frame required depending on the type of enterprise.

While supportive of pain relief, SPA also opposes the second element of the Bill which seeks to regulate the use of pain-relief for mulesing. As previously outlined, SPA promotes industry best practice when mulesing which includes pain relief. SPA will continue to encourage sheep producers to phase out mulesing as soon as practical and believes this is best achieved through industry and market initiatives. As opposed to regulation which may be continually adjusted in its detail by successive Governments.



Furthermore, ear-marking, ear-tagging, castration and tail-docking, will also have issues with the proposed regulation due to the food safety and toxicity risks associated with pain relief products. Tri-solfen is the most widely used pain-relief product in the livestock industry. The Withholding Period (WHP) for Tri-Solfen is 90 days which means that any animal that is administered Tri-Solfen cannot be processed for meat for a period of 90 days. A WHP is the minimum period between administering or applying a veterinary medicine and the slaughter, collection, harvesting or use of the animal or crop commodity for human consumption. WHP are designed to ensure that chemicals and compounds used to treat animals do not enter the human food-chain for food safety reasons. Any additional pain relief regulation for these livestock procedures would contribute to significant livestock supply disruptions as animals would not be able to be processed at their ideal time. There is also a risk that livestock could be processed within the 90 WHP, risking chemicals entering the food-supply chain.

In addition, buccalgesic is another common livestock pain-relief product. Animals cannot be treated with Buccalgesic more than once in a 21-day period. This means that important husbandry procedures may not be undertaken if they fall within the 21-day period. This could seriously compromise good animal care and the animal's health.

Moving forward, SPA remains committed to advocating that a range of suitable pain relief options be available to enable producers to follow best practice pain management. SPA will be guided by the science and continue to participate in the Standard and Guideline reviews, which have always formed the backbone of what is required practice within the sheep industry. SPA supports further research into pre and post local analgesic options for husbandry practices undertaken by sheep producers. SPA is monitoring the development of new products from research bodies and industry, and will continue to work with WoolProducers Australia, state farming organisations and other relevant bodies.

Should you have any questions regarding this submission, please contact William Oldfield, Policy Manager on [redacted] or at [redacted]

Yours sincerely,

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