Submission No 17

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

Organisation: NSW Farmers

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Submission on the

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

NSW Inquiry

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Background

Who NSW Farmers Are:

The NSW Farmers' Association is Australia's largest state farming organisation representing the interests of its farmer members.

Farmers across New South Wales produce more than $15 billion worth of food and fibre every year, representing around one quarter of Australia's total agricultural output. Our state's unique geography means a wide variety of crops and livestock can be cultivated and nurtured. NSW Farmers is Australia's only state-based farming organisation that represents the interests of farmers of all agricultural commodities – from avocados and tomatoes, apples, bananas and berries, through grains, pulses and lentils to oysters, cattle, dairy, goats, sheep, pigs, and chickens.

Our focus is not just on issues affecting particular crops or animals – it extends to the environment, biosecurity, water, economics, trade, and rural and regional affairs. We also have an eye on the future of agriculture; we are advocates for innovation in agriculture, striving to give our members access to the latest and greatest innovations in research, development, and extension opportunities. Our industrial relations section provides highly specialised advice on labour and workplace matters.

Our regional branch network ensures local voices guide and shape our positions on issues which affect real people in real communities. Members are the final arbiters of the policies of the Association – through our Annual Conference and elected forums such as Executive Council, members can lobby for the issues which matter to them and their community to become Association policy. Our issue- and commodity-specific Advisory Committees are elected by members to provide specialist, practical advice to decision makers on issues affecting the sector. We are proudly apolitical – we put our members' needs first.

In addition, NSW Farmers has partnerships and alliances with like-minded organisations, universities, government agencies, and commercial businesses across Australia. We are a proud founding member of the National Farmers' Federation.

Executive summary

NSW Farmers 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). In our submission we will present the views of the thousands of livestock producers who make up our membership, who stand to be impacted by the Bill.

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. A mulesing ban would lead to increased incidences of flystrike as unmulesed sheep are more susceptible to the condition. Therefore we strongly oppose a ban to the practice of mulesing as it will result in poorer animal welfare outcomes than those achieved by the practice.

Mulesing remains one of the most effective flystrike mitigation tools available to farmers. Farmers must continue to have the choice to access this tool so that they have a range of avenues to combat the debilitating condition that is flystrike. The proposal to ban mulesing by 1 January 2022, in under 18 months, is totally unachievable and unfeasible.

While supportive of pain-relief usage, NSW Farmers also opposes the second element of the Bill which seeks to regulate the use of pain-relief for a range of procedures including mulesing, earmarking, ear-tagging, branding, castration, dehorning/ de-budding, and tail-docking.

The grounds for our opposition to regulated pain-relief focus on the food-safety and toxicity risks associated with pain-relief products. Mandatory pain-relief, especially if required for ear-tagging, would also have a significant and adverse impact on producer's ability to sell stock quickly as and when needed. One such example being during both the drought and recent bushfires, but also when other management and seasonal changes occur, given the withholding periods associated with some products.

By banning mulesing and regulating pain-relief, the Bill will actually facilitate worse animal welfare outcomes. It will leave millions of sheep exposed to flystrike and it will risk pain-relief chemicals entering the food supply-chain. The Bill must be opposed.

Our recommendations and responses are outlined below:

Recommendations

NSW Farmers makes the following recommendations:

1. Mulesing must be retained as a critical practice in minimising the risk of flystrike;
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:
    a. Mulesing;
    b. Tail-docking;
    c. Dehorning/ or debudding;
    d. Castration;
    e. Branding; and
    f. Ear-marking or ear-tagging.

The NSW Wool Industry

NSW Wool Industry

New South Wales' 20,474 woolgrowers farm 22.9 million sheep which collectively produce 87.8 million kilograms of wool each year.[1] The annual value of NSW's wool production is $1.32 billion,[2] and accounts for 33.2% of Australia's entire woolclip. If NSW were a country it would be the world's fourth-largest supplier[3].

These statistics demonstrate the importance of wool production to the NSW economy, highlighting the need of all NSW politicians to support and build the wool industry, and to ensure that no unnecessary regulation is imposed on the industry.

Different Climatic Conditions

New South Wales is a large and vast state, with many different geographic and climatic regions. The geographic spread of wool production in NSW varies considerably, from the dry pastoral stations in the west to high-rainfall areas such as the New England region[4].

The different geographic and climatic conditions in which wool is grown across NSW necessitate different on-farm management and production systems[5]. Each climatic region zone has different capabilities and production constrains that dictate what sheep and wool can be grown[6].

There is a recognised relationship between rainfall and wool types. Generally sheep from high-rain fall climates produce finer micron wool, while sheep from lower rainfall regions tend to grow broader wool[7].

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[1] Australia Wool Innovation, Sheep Numbers By State (2019) <https://www.wool.com/market-intelligence/sheep-numbers-by-state/>
[2] Australia Wool Innovation, AWI in Your State - NSW (2019) < https://www.wool.com/globalassets/wool/about-awi/media-resources/publications/awi-in-your-state/awi-in-your-state-nsw/awi-in-your-state-nsw-270819.pdf>
[3] The NSW Department of Primary Industries, NSW Wool Industry & Future Opportunities (2015) <http://www.dpi.nsw.gov.au/__data/assets/pdf_file/0004/543523/Final-Report-NSW-Wool-Industry-and-Future-Opportunities.pdf>
[4] Australian Wool Innovation (Learn About Wool), Wool Production in Australia <https://www.learnaboutwool.com/globalassets/law/resources/factsheets/secondary/gd0317-secondary-fact-sheet_e1_v4.pdf>
[5] University of New England, Profile of the Australian Wool Industry (2009) <https://www.woolwise.com/wp-content/uploads/2017/07/Wool-412-512-08-T-01.pdf>
[6] Ibid
[7] Ibid.

These climatic and production variances that exist across NSW mean no one uniform management tool suits all NSW wool-growers, especially in relation to flystrike mitigation.

Seasonal Variations and Industry Disruptions

Farmers constantly have to manage the variable nature of seasonal conditions and external industry impacts. A current example of this is the recent drought where many NSW wool growers have experienced diminished wool production for the last few years. The impacts of the drought have been compounded by the current COVID-19 pandemic which has caused wool prices to drop considerably in 2020 due to economic easing and a global reduction in retail sales[8].

The reliance and exposure of the wool sector to external shocks highlights the need for the industry to be able to respond to such events in a flexible and, at times, urgent manner. Prescriptive responses to livestock management and welfare issues are problematic as no one solution can be uniformly applied across all farms. This highlights the inappropriateness of this Bill, especially the proposal to ban mulesing, one of the most effective tools to manage flystrike.

[8] The Department of Agriculture, Water and Environment (ABARES), Natural fibres – June Quarter 2020 <https://www.agriculture.gov.au/abares/research-topics/agricultural-outlook/natural-fibres>

Flystrike

Fly Strike

Flystrike is a devastating condition that can have a severe impact on an animal's welfare. It occurs when a blowfly lays eggs on the skin of the sheep and the emerging larvae create an open wound as they feed on the underlying skin tissue and it can quickly become fatal.[9]

Sheep are particularly susceptible to flystrike due to the presence of breech wrinkle, "dags" (an accumulation of faecal matter as a result of scouring[10]) and urine stains in their wool. Sheep farmers are consequently always taking steps to reduce the occurrence of flystrike and improve their animals health, this includes mulesing their sheep.

Problems with Flystrike

In addition to the animal health and welfare risks posed by flystrike, it also costs the industry over $280 million per annum[11]. This equates to around 10% of the industries yearly value of production[12]

By mulesing, farmers significantly improve the welfare of their animals as the procedure reduces the likelihood that a sheep will be flyblown during its life, which means that the animal will not suffer needlessly nor die prematurely. It also reduces economic costs associated with flystrike such as the loss of production, and time and the cost of chemicals needed to treat impacted animals.

[9] Australia Wool Innovation, Managing Breach Flystrike (2019) <https://www.wool.com/globalassets/wool/sheep/research-publications/welfare/improved-breech-flystrike-management/gd2428-2019-managing-flystrike-manual_11.pdf>
[10] Australia Wool Innovation, Dealing With Dag <https://www.wool.com/globalassets/wool/sheep/research-publications/welfare/improved-breech-flystrike-management/dealing-with-dag-factsheet-v3.pdf>
[11] WA Department of Primary Industries and Regional Development, Managing Flystrike in Sheep (2017) <https://www.agric.wa.gov.au/livestock-parasites/managing-flystrike-sheep>
[12] Rural Bank, Annual Australian Wool Update (2018) <https://www.ruralbank.com.au/siteassets/_documents/publications/sheepwool/wool-annual-review-2018.pdf>

Mulesing

Mulesing

Mulesing is a critical practice used throughout the wool industry to reduce the risk of flystrike.

Other forms of flystrike mitigation such as anti-flystrike clips and Sheep Freeze Branding (SFB) or 'steining' (a process of applying liquid nitrogen to create a wool-free area on a sheep's breach) are not considered mulesing under the Australian Animal Welfare Standards and Guidelines for Sheep (The Standards) definition. These methods provide producers with an alternative breach modification solution to mulesing, they are not surgical procedures. It is crucial these alternative flystrike prevention practices are not considered mulesing.

Why Mulesing Is Undertaken – An Effective Form of Flystrike Protection

Mulesing is widely used in the wool industry because it is a very effective form of flystrike protection that improves the lifetime welfare outcomes and reduces unnecessary mortality for sheep. By creating a bare area on a sheep's breach, mulesing significantly reduces the accumulation of faecal matter in an animal's wool, thus significantly reducing an animal's susceptibility to flystrike. Statistics indicate that currently around 70% of merino wool producer's mules their sheep[13].

The mulesing procedure is undertaken only once in order to provide them life protection from flystrike. Research shows that mulesing significantly reduces rates of flystrike to between 1-3% of mulesed sheep[14]. This is in comparison to flystrike rates of 17% when sheep are unmulesed, according to the CSIRO[15]. Other studies reinforce this by estimating that mulesing prevents over 3,000,000 sheep from becoming flystruck every year.[16]

The significance of these statistics must not be underestimated. They demonstrate just how effective mulesing is in reducing the occurrence of flystrike and clearly demonstrate why it must be retained until there is a viable alternative.

[13] Australian Wool Innovation, Progress <https://www.wool.com/sheep/welfare/breech-flystrike/progress/>
[14] Ibid,
[15] Horton, Corkrey & Doughty, 'Sheep death and loss of production associated with flystrike in mature Merino and crossbred ewes', Animal Production Science, CSIRO (2017) <https://www.publish.csiro.au/an/an16153>
[16] (Wardhaugh and Morton, 1990)

Why Mulesing Must Be Retained

Flystrike prevention is a complex issue with many different variables to consider. This means there is no one definitive approach that universally eliminates flystrike. For this reason, it is common for farmers to utilise a suite of different management tools to minimise the risk of flystrike, including but not limited to, mulesing, crutching, chemical treatments, breeding and nutrition.

Despite AWI investing over $35 million in mulesing alternatives over the last 10 years, mulesing remains recognised as one of the most effective tools at farmer's disposal to reduce flystrike17. Mulesing provides lifetime protection against flystrike. None of the other tools alone can replace mulesing and they must be used to complement mulesing in a multifaceted approach to fighting flystrike.

Banning mulesing would have a significant impact on farmers' ability to manage and reduce the risk of flystrike. It would have devastating consequences for farmers and animals. It would lead to poorer animal welfare outcomes for millions of sheep in NSW, as these animals would be left extremely exposed to flystrike. Given the large and demonstrable risks associated with banning mulesing, it must continue to be a tool available to farmers to minimise fly strike risks and produce high quality welfare outcomes.

Proposed Phase out Timeline

As stated above, NSW Farmers is strongly opposed to any move to ban mulesing and would not support any timeframe for phasing out the practice.

However, for the purpose of providing feedback on the contents of the "Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019" (The Bill) we will outline why the proposal to phase out mulesing by 1 January 2022 is dangerous and entirely implausible:

- **Breeding programs are not a viable option for all producers**

NSW Farmers acknowledges that genetics do play a role in breeding plain-bodied sheep for traits that may make them less susceptible to flystrike. However, we equally recognise that implementing

[17] Australian Wool Innovation AWI breech strike RD&E program (2017), <https://www.wool.com/globalassets/wool/sheep/research-publications/welfare/flystrike-research-update/awi-breech-strike-rde-program-update-nov-2017.pdf>

a breeding program to produce bare breached sheep is not possible on every farm due to production or climatic constraints.

In many areas, especially high-rainfall areas18, worms have a bigger impact on animal health than flystrike. By prioritising the breeding of barer breached sheep, farmers could be pursuing some genetic characteristics at the expense of other important hereditary traits such as worm resistance. Therefore, genetic selection must not be considered a universal remedy for all sheep conditions and it must be noted that in some circumstances, it may actually lead to adverse animal health and welfare outcomes.

- **Genetic solutions are not as effective as mulesing**

A number of scientific studies have found that genetics are not as effective as mulesing for preventing flystrike. Research evidence shows that through breeding and genetic selection flystrike rates can fall to around 6%, double the rate of flystrike that can be achieved through mulesing[19]. This reinforces NSW Farmers position that mulesing is still an effective method of flystrike mitigation, and that other tools should be used in combination with mulesing, not at the exclusion of it.

- **Two years is an unachievable timeframe**

As outlined above, NSW Farmers does not support a ban on mulesing nor do we believe that genetics is the solution to flystrike mitigation. Instead we emphasise that it is only one of many tools that farmers should use to reduce the risk of flystrike

The Bill proposed to ban mulesing on 1st January 2022. This proposed timeframe would only provide wool growers less than 18 months to implement and undertake a breeding program to move toward an effective bare breached flock. This is something that is not physically possible in the given timeframe.

As sheep are only 'joined',[20] once a year, the Bill is expecting farmers to make the required genetic change in one generation. However the experience of farmers and research, both indicate that it takes far longer to fully transition to a 'non-mulesed' farming entity. It has been estimated to take 20

[18]Victorian Farmers Federation, Livestock Fact Sheet (Worms in Sheep) (2012) <https://www.vff.org.au/vff/Documents/Livestock%20Resources/Worms%20in%20Sheep.pdf>
[19] Department of Agriculture and Food Western Australia, University of Western Australia, CSIRO Animal, Food and Health Sciences <https://www.sheepcentral.com/latest-flystrike-research-recommends-producers-cull-sheep-struck-by-flies/>
[20] WA Department of Primary Industries and Regional Development, Joining – setting the potential of your ewe flock, (2020) <https://www.agric.wa.gov.au/management-reproduction/joining-%E2%80%93-setting-potential-your-ewe-flock>

years of breeding for farms to even consider discontinuing mulesing[21]. However, this timeframe will be different on each property due to genetic and climatic constraints – on some farms it could take less than 20 years, and on others it could take longer. There is no one, universal breeding solution.

Therefore, a move to ban mulesing, especially in the short timeframe proposed in the Bill, is not realistically achievable and must not be implemented. It would diminish animal welfare outcomes, farmers would lose access to an effective flystrike mitigation tool, and they would not have sufficient time to change their management practices accordingly.

- **Increased reliance on chemical treatments**

Any mulesing ban is inadvisable as it would increase farmer's reliance on chemicals to prevent and treat flystrike. Such an increase in chemical usage is problematic for a number of reasons.
First increased chemical usage leads to parasite resistance. This has already been demonstrated by the Australian sheep blowfly, Lucilia cuprina, developing resistance to at least three classes of insecticides that have been previously been used as flystrike treatments[22]. These flies are also currently building up their resistance to those insecticides presently available for treating flystrike such as Clik and Ivermectin [23].

As flies increase their resistance to chemicals, these chemicals become less effective. Overtime, chemical resistance reduces the effectiveness of insecticides used to treat flystrike and leaves farmers with less options to prevent and treat flystrike.

This is a real problem for the wool industry. Growing reliance on chemicals could causes the chemicals that are available to stop working on flies and maggots. Farmers would then have no tool to treat infected sheep. Chemicals treatment of flystrike alone is not the answer.

Second if mulesing was banned and farmers were required to use more chemicals to treat flystrike, there is an increased risk of chemical residues being detected in Australian wool which puts our market access and wool export industry at significant risk.

[21] Australian Wool Innovation, Planning for a non-mulesed enterprise (2018) <https://www.wool.com/globalassets/wool/sheep/welfare/breech-flystrike/breeding-for-breech-strike-resistance/planning-for-a-non-mulesed-merino-enterprise.pdf>
[22] Flyboss, Insecticide Resistance <http://www.flyboss.com.au/sheep-goats/treatment/insecticide-resistance.php>
[23] Ibid.

NSW Farmers Approach

Above we have outlined why the practices of mulesing must not be banned. During this section of our submission we will highlight the proactive activities of the NSW wool industry to ensure that pain-relief is used during mulesing. This will reinforce why mulesing must be retained and will demonstrate why regulated pain-relief is not necessary.

Industry-Led Initiative & Compliance

Pain relief amongst the wool industry is already high. At our 2019 Annual Conference we established the following policy to ensure we can reach 100% pain relief usage.

"That NSW Farmers support the mandating of local anaesthetic or analgesic during mulesing through an industry led initiative".

The intent of the motion was to ensure that industry reaches 100% pain relief usage. Since this motion NSW Farmers have developed two approaches to implement this policy which are outlined below:

- **Approach 1**

The first approach involves the National Wool Declaration (NWD), a voluntary statutory declaration outlining a farmer's mulesing status, being made a compulsory condition of sale. We also recommend that the statuses on the NWD be reduced over time to include only the options of AA (Analgesia/Anaesthetic) and NM (Non-Mulesed).

Under our strategy, farmers would be required to fill in this legal document prior to selling their wool and at a minimum, they would have declare that pain relief has been used.

The NWD is already audited by the NWD Integrity Program (NWD-IP) meaning this approach of mandating pain-relief can be verified and scrutinised.

- **Approach 2**

The second approach involves Australia's wool brokers setting an industry standard. The industry standard would require all wool brokers receive a completed NWD from their clients in order to accept the wool for sale. Failure to produce an NWD would result in a wool-broker rejecting a grower's wool.

These approaches would work more effectively than government intervention. They focus on ensuring the whole supply-chain is accountable for pain relief usage, not just farmers. We believe it is important that the whole industry takes responsibility for pain relief adoption. An industry-led initiative will achieve this, government regulation will not.

Pain Relief

The Bill

In addition to the proposal to ban on the practice of mulesing, the Bill also seeks to regulate the need for pain relief for the following procedures:

- Earmarking, ear-tagging or branding any livestock;
- Castrating a pig, cattle, sheep or goat;
- Dehorning or de-budding a cattle or goat;
- Tailing a sheep; and
- Mulesing[24]

NSW Farmers is committed to guaranteeing high-levels of animal welfare. However, regulating pain-relief for the above animal husbandry procedures is something NSW Farmers opposes for a range of reasons. Further, we believe it is crucial to a comprehensive understanding of welfare to recognise that not all pain-relief is chemically based. The grounds that NSW Farmers oppose legislated pain relief include, but are not limited to, the availability and access to pain-relief products, residue risks and food safety concerns, and animal toxicity.

We will outline our opposition below.

Current Pain Relief Usage & Industries Proactive Approach

Firstly, it is important to highlight that pain relief usage is widespread throughout Australia's livestock industries and it is used for a vast number of procedures. All livestock industries have taken proactive steps to educate producers on the benefits of using pain-relief based on extensive research into the rationale and therefore promote and encourage its use as industry best practice.

Since Tri-solfen became available for use in 2008, (the first pain relief product approved and registered for use in livestock industries), usage rates for mulesing in the wool industry have continually increased and currently sit close to 85%[25]. For reaching these high levels of adoption the wool industry must be congratulated

[24] Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019
[25] Australian Wool Innovation, Anaesthetics and analgesics widely adopted by woolgrowers (2019) <https://www.wool.com/globalassets/wool/sheep/research-publications/welfare/improved-pain-relief/btb-dec2019-anaesthetics-analgesics-widely-adopted-by-woolgrowers.pdf>

In the cattle industry, pain relief products have been available for a far less time, for castration since 2016 and de-horning only since 2018[26]. Despite pain relief products only being available for a short time, less than 2 years, the cattle industry has embraced it strongly. At present nearly a quarter of all beef farmers use pain relief and this is exponentially increasing by 33% each year[27].

The above demonstrates the livestock industries have been successful in driving the voluntary adoption of pain-relief. When considered alongside their proactive approach to other areas of animal care, such as the widespread acceptance of poll-cattle and low-stress stock handling, it is clear that the industry does not need regulation in-order to improve animal welfare outcomes.

Access to Pain Relief

Goats are one of the livestock classes referred to in the Bill. However, no pain relief products have been approved by the Australian Pesticides and Veterinary Medicines Authority (APVMA) for use in the goat industry. That means that if goat producers are expected to abide by the Bill, they will have to breach the APVMA Code. This is without considering the residue and food safety risk associated with goat producers administering a pain-relief that has not been tested for their industry. As a key export product, residues would put our market access in serious jeopardy.

Therefore mandatory pain relief for the livestock and procedures listed in the Bill would create a number of legally unworkable positions. It would create a state law that pushes farmers to contravene federal requirements. This is one of many reasons that mandatory pain-relief should not be regulated.

Withholding Periods

A Withholding Period (WHP) is the minimum period between administrating or applying a veterinary medicine, and the slaughter, collection, harvesting or use of the animal or crop commodity for human consumption[28].

Withholding periods are designed to ensure that chemicals and compounds used to treat animals do not enter the human food-chain for food safety reasons.

[26] Meat and Livestock Australia, Pain Relief Production Extension (2018) < https://www.mla.com.au/news-and-events/industry-news/archived/2018/pain-relief-production-extension/>
[27] Australian Beef Sustainability Framework, 2020 Annual Update (2020) <https://www.sustainableaustralianbeef.com.au/58735/widgets/299337/documents/172555>
[28] Australian Pesticides and Veterinary Medicines Authority, Pesticides and veterinary residues (2020) <https://apvma.gov.au/node/10806#>

Export Slaughter Intervals (ESI)

An Export Slaughter Interval (ESI) is the minimum time that should elapse between administration of a veterinary chemical to animals and their slaughter for export[29]. They act to protect Australian market access, as the detection of a residue in meat destined for an international market could have a disastrous impact on Australia's meat exports[30].

Withholding Periods and Export Slaughter Intervals for Pain Relief Products – A Food Safety Risk

- **Red Meat**

Tri-solfen is the most widely used pain-relief product in the livestock industry. It makes up around 70% of all pain relief usage31. The withholding period 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 days32.

For Australia's prime lamb industry, mandatory pain-relief would be unworkable and could compromise the supply of lamb meat. Some prime-lambs in Australia are processed at 12 weeks. These same lambs are castrated, ear-marked and tail-docked at around 4 weeks of age. This demonstrates that animals cannot comply with the mandated WHP's, if they are to be processed for meat and have the required husbandry practices carried out.

Therefore, at the time of processing at 12 weeks, 90 days could not have passed since these lambs had been administered Tri-solfen. There is also a risk that lambs could be processed within the 90 WHP, risking chemicals entering the food-supply chain.

- **Dairy**

The withholding periods for animals used in the dairy industry is sometimes greater than that for those in the red-meat industry, as the active ingredients are transferred through milk. For example

[29] Ibid
[30] Ibid
[31] Australian Wool Innovation, Anaesthetics and analgesics widely adopted by woolgrowers (2019) <https://www.wool.com/globalassets/wool/sheep/research-publications/welfare/improved-pain-relief/btb-dec2019-anaesthetics-analgesics-widely-adopted-by-woolgrowers.pdf>
[32] APVMA, Public Chemical Resgistration Information System Search (Tri-solfen) (Searched 2020) <https://portal.apvma.gov.au/pubcris?p_auth=q8gSMFuZ&p_p_id=pubcrisportlet_WAR_pubcrisportlet&p_p_lifecycle=1&p_p_state=normal&p_p_mode=view&p_p_col_id=column-1&p_p_col_pos=2&p_p_col_count=4&_pubcrisportlet_WAR_pubcrisportlet_id=60099&_pubcrisportlet_WAR_pubcrisportlet_javax.portlet.action=viewProduct>

the APVMA withholding period for Buccalgesic is lifelong33. The APVMA state that Buccalgesic cannot be administered to any cattle that will ever produce milk for human consumption.

The above demonstrates that regulating pain-relief poses a real risk to the supply of red meat and dairy, and to greater our food safety. Pain-relief must therefore not be mandated for the following procedures: earmarking, ear-tagging or branding, castration, dehorning or de-budding, tail-docking or mulesing.

Animal Toxicity

Buccalgesic is another common pain-relief product. Animals cannot be treated with Buccalgesic more than once in a 21 day period34. This means that important husbandry procedures may not be undertaken if they become necessary within the 21 day period of the product previously being administered, potential impacting the animal's health and welfare outcomes35.

This demonstrates that by mandating pain-relief for routine husbandry procedures, it is possible that animal welfare could actually be compromised rather than improved. If an animal required multiple procedures in a short succession the animal would have to forego the additional procedures where Bucalgesic has been used, or risk ingesting a toxic dose.

Withholding Periods – Impact of Tagging and Traceability

It is a requirement under Australia's National Livestock Identification Scheme (NLIS) that all animals are tagged before they leave their property of origin, whether that be for sale to another producer or for processing36. This practice ensures full traceability of livestock, a key tool in managing biosecurity and securing market access.

The Bill proposes that farmers apply pain-relief when ear-tagging, which to meet the NLIS traceability requirements, is something that often occurs just prior to stock leaving their property of origin. The recent drought and bushfires have demonstrated that in many instances the decision to sell stock is urgent and instantaneous. Given Tri-solfen has a WHP of 90 days, the proposed Bill is

[33] APVMA, Public Chemical Resgistration Information System Search (Buccalgesic) (Searched 2020) < https://portal.apvma.gov.au/pubcris?p_auth=q8gSMFuZ&p_p_id=pubcrisportlet_WAR_pubcrisportlet&p_p_lifecycle=1&p_p_state=normal&p_p_mode=view&p_p_col_id=column-1&p_p_col_pos=2&p_p_col_count=4&_pubcrisportlet_WAR_pubcrisportlet_id=68974&_pubcrisportlet_WAR_pubcrisportlet_javax.portlet.action=viewProduct>
[34] Ibid.
[35] Ibid.
[36] National Livestock Identification Scheme (NLIS), NLIS Information < https://www.nlis.com.au/NLIS-Information/>

unworkable. Farmers would lose the ability to tag and turn-off stock at short notice (under 90-days) which is common.

Further, producers' inability to perform any animal husbandry procedures, especially tagging within 90 days could compromise traceability and have significant trade and biosecurity ramifications.

Limited Products

At present there are only limited pain relief products available for each class of livestock, and for each husbandry procedure, with common products including Tri-solfen, Buccalgesic, Metacam and Numnuts. If pain relief was to be mandated in legislation, producers would have a limited range of pain-relief options available and the chemical manufacturers would have too much control over supply. Manufacturers could use their market power to limit access through price gouging.

NSW Farmers believe that at present there are not enough pain-relief products available for use. We believe that farmers need access to a greater range of pain-relief options and until this occurs, pain-relief cannot be regulated.