

Submission
No 24

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

Organisation: Sentient - The Veterinary Institute for Animal Ethics

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Sentient supports the Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019. We advocate for a prohibition on mulesing sheep from 1 January 2022, and for mandatory administration of pain relief for mulesing (which we would specify should be multimodal) until the time of prohibition. We agree that mandatory pain relief should extend to other invasive procedures performed on stock animals, such as castration, branding, dehorning and tail-docking, and would specify there be no exemptions based on age. This bill would align NSW with Victoria, which under the Prevention of Cruelty to Animals Regulations 2019, has recently prohibited mulesing without the use of a pain relief product registered for use by the Australian Pesticides and Veterinary Medicines Authority.

As an independent veterinary organisation, Sentient also supports amendments to the Veterinary Practice Act 2003 and Veterinary Practice Regulation 2013 as a result of the proposed prohibition of mulesing.

In 2004, the Australian wool industry agreed to phase out this cruel practice by 2010 but has reneged on its undertaking. Sheep are sentient beings and it is appalling that unlike companion animals, the law fails to protect them from undergoing such a brutal procedure but instead, upholds the interests of industry over animal welfare. Mulesing is currently performed on approximately 70% of Merino sheep in Australia and 25% of these sheep receive no pain relief. Furthermore, no form of pain relief currently used (Tri-Solfen[®], Buccalgesic[®] and Metacam[®]) is pre-operative and so cannot prevent pain at the time the procedure is performed. Mulesed lambs demonstrate acute pain responses lasting up to 48 hours and their wounds can remain unhealed for up to 30 days, rendering them more susceptible to flystrike.

Sentient promotes a genetic solution as the most sustainable permanent solution for flystrike prevention. This would involve breeding Merino sheep with characteristics suitable for the Australian environment (such as flystrike resistance, fleece rot resistance, reduced breech wrinkling and cover, low dag score and wool colour). There are already Merino breeders in every state who have ceased mulesing after adopting the SRS (soft rolling skin) breeding system, which can be achieved within three to five years.

We also support the development of a flystrike vaccine. In the meantime, preventative husbandry practices should include the strategic timing of shearing and crutching, insecticide use, internal parasite control, control of scouring, effective grazing management and close flock inspection. Tail docking should not be considered a strategy to prevent flystrike.

Furthermore, alternative breech modification procedures such as intradermal formulations, breech clips or the application of liquid nitrogen ('steining', or sheep freeze branding) are not acceptable because they also induce significant pain and stress responses in sheep. Sentient advocates for

government funding for a genetic solution and for improved labelling systems to certify and trace non-mulesed Merino wool, meaning the lambs have not been subjected either to mulesing or to another breech modification procedure.