

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

Organisation: NSW Stud Merino Breeders Association Ltd
Date Received: 3 August 2020



The Australian Merino Centre
ABN 95 002 659 896

Locked Bag 4317
Sydney Olympic Park NSW 2127
Tel: 02 9763 2744
Mobile: 0431 876 485
Email: office@merinonsw.com.au
www.merinonsw.com.au

The NSW Stud Merino Breeders Association Limited (NSW SMBA) -
Submission

to:

Parliament of New South Wales Parliament Inquiry
Committee Chair Mark Banasiak, Portfolio Committee No.4

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

DATED: 31 JULY 2020

ABOUT The NSW Stud Merino Breeders Association

The NSW Stud Merino Breeders Association was established in 1894 formally known as the NSW Sheepbreeders' Association until 1979. The Association represents a membership of 344 Stud Merino Breeders and woolgrowers, most having their own substantial commercial operations and liaise extensively with commercial growers throughout NSW, Australia and Internationally.

An objective of NSW SMBA is to promote and encourage the breeding and presentation of higher quality merino sheep and to improve the standard of the breed.

It should be noted that the Stud Industry represents the Genetic base of the entire Australian Sheep Industry.

NSW Stud Merino Breeders has a member democratically elected board located throughout the State.

The NSW SMBA's members are committed to the continuous improvement of Merino Sheep and animal welfare in our state and beyond.

Our website is www.merinonsw.com.au

Submission response

The NSW Stud Merino Breeders Association Ltd (NSW SMBA) does not support the amendment of the Prevention of Cruelty to Animals Act 1979, strongly opposing any prohibition of the mulesing procedure and mandating “the administration of pain relief in certain procedures involving stock animals; and for other purposes.”

The NSW SMBA supports and recommend animal welfare best practice including the use of anaesthetic or analgesic (A & A) but does not support any mandatory policy.

What is mulesing and why is it a widely used procedure within the sheep industry.

Mulesing is an essential tool used to manage the welfare of sheep from flystrike. Flystrike is caused by blowflies laying their eggs in the fleece, producing devastating flesh eating maggots, resulting in the painful death of sheep.

Flystrike is prone to the breech area with the remaining urine moisture and smell attracting the blue-green blowfly (*Lucilia cuprina*)

Failure to treat flystrike is an offence under the Prevention of Cruelty to Animals (POCTA) Act.

Extensive research is being undertaken, while some producers are further along than others. The priority of the producers is the health and well-being of their sheep for their entire life and ensuring the viability of the flock and the industry as a whole.

CSIRO research shows that unmulesed Merino sheep have a 6-fold increased risk of breech strike compared with mulesed sheep under the same conditions.” CSIRO 2018 Research Article Modelling of breech strike risk and protective efficacy of mulesing in adult Merino sheep.

If mulesing were banned tomorrow, it is estimated that over 7 million sheep could be flystruck, and 1 million sheep could die a slow and painful death from just one fly wave period.

Animal Health

Woolgrowers are industry professionals, they are passionate about animal welfare, and are in the best position to determine best practice welfare outcomes for their sheep. Mulesing, at this stage, ensures an unsurpassed outcome for the lifetime of the animal.

The 2017 Australian Wool Innovation (AWI) Merino husbandry practices Survey, outlines on page 57 that 54% of NSW producers mulesed wether lambs and 62% mulesed ewe lambs, significantly less than the national average of 60% and 70% respectively. It further outlines on page 61 that 88% of NSW producers use anaesthetic or analgesic at mulesing wether and ewe lambs, which is higher than the national average of 84% for wether lambs and 83% for ewe lambs

A University of New England survey in 2019 confirms over 90 % of NSW woolgrowers are already using A & A (Beyond the bale, June 2020). We maintain that education, encouragement and training of the minority would be a far more beneficial outcome.

NSWMSBA support and encourage the use of A & A in certain procedures involving stock animals.

Regulation

It is widely reported, by industry groups, that implementing mandatory pain relief would be an industry led initiative – Who is going to regulate this? Without any mandate, the industry has increased the use and implementation of A & A to over 88% alone. It is envisaged that with Increased education, encouragement, and training we could get this figure to 100%.

Chemical resistance

The threat from increasing blowfly resistance to the commonly used chemical applied, for prevention of strike, means woolgrowers need effective long-term fly control strategies to minimise the risk of chemical resistance. They do this by only using chemicals when necessary and implementing integrated pest management strategies that incorporate non-chemical controls such as mulesing with anaesthetic and analgesia, genetic selection and timing of shearing and crutching.

Today, the heavy use of chemicals in place of surgical procedures combined with anaesthetic or analgesic seems contradictory whilst moving to a clean and green product. Producers would like to reduce or use limited chemicals on their sheep, and they should not be used as an alternative.

The increase of chemical use replacing the mulesing procedure, already, has seen wool growers suffer the consequences of chemical resistance. If this practice continues, the welfare of our sheep is under enormous threat of major losses when another fly wave returns.

What we are doing to head in the right direction

The Industry is heavily invested in alternatives to mulesing through our industry research body, Australian Wool Innovation (AWI). Since 2001, over \$37 million has been invested in flystrike Research and Development alone. AWI takes an evidence-based scientific welfare approach approach for managing flystrike risk.

There has been an increase in sheep selection for both welfare and productivity; every reduction in the natural breech traits improve an animal's welfare.

Below is a caption from Dr Forbes Brien's paper published in June 2019 that is relevant to this subject, followed by an overview of the Merino Lifetime Productivity Project (MLP project) and what parallels have come out of these studies.

Links to these entire papers and projects are provided below or are publicly available on the AWI website - Project ON 524 Final Project report by Dr Forbes Brien.

*Results from AWI's R & D program on breech flystrike suggest that Merino sheep should have maximum individual scores of 2, 2 and 3 for breech wrinkle, dag and breech cover before the flock should be considered as not requiring mulesing. **How long it will take to reach these targets will vary considerably across different sheep types and environments. In fine and superfine wool Merinos (18-19 micron and finer) where there is likely to be a key focus on genetic reduction of fibre diameter, results from this study indicate that achieving long-term genetic reductions in breech traits may require more selection emphasis and take longer to achieve than in fine/medium wool and dual purpose sheep.** In the meantime, use of chemical prevention, crutching and other managerial interventions will need to be continued and a possible move to breed fine rather than superfine wool sheep as an interim measure may also need to be considered. In addition, where Merino sheep are run in high dag environments and have average scores for dag of 3 or more, achieving a genetic reduction to a maximum score of 2 for any individual sheep in the flock appears not to be a realistic strategy using current breech traits as criteria in selection. **The predicted minimum timeline for achieving a 1 score reduction is a minimum of 2 to 3 decades long or more.** In lower dag environments, breeding to reduce dag is much more feasible, with genetic reductions of 0.1 to 0.2 in dag score predicted over 10 years from genetic gain from selection at the stud level, with greater reductions possible (0.5 of a score) by incorporating other ram buying and ewe culling strategies outlined above.*

You will note from the evidence-based scientific paper above, to cease mulesing by 2022 is not realistic from an animal welfare perspective. This evidence-based paper has been produced, representing the whole of the sheep industry of approximately **68 million sheep** across Australia, not just a selected group of breeders that transitioned from a very plain base.

Retain tail docking and castration with pain relief, (World's Best Practice), and Mulesing with A & A for as long as possible

Merino Lifetime Productivity project

Understanding and maximising lifetime performance is critical to increasing productivity and profits for woolgrowers.

The Merino Lifetime Productivity (MLP) project has been designed to capture lifetime data from diverse environments, genetics, and Merino types to help us better understand and deliver lifetime performance outcomes for the Australian Merino industry.

The ewe progeny from 166 industry sires (known as F1 ewes) will be annually wool sampled, visually scored, fleece and body weighed, carcase scanned, faecal sampled and classed by two independent classers. The F1 ewes will be joined to Merino sires from 18 months of age and all reproduction data will be recorded until they are 5-6 years of age.

The Australian Wool Innovation (AWI) funded Merino Lifetime Productivity (MLP) project is a \$7m (plus \$5m from partners), 10-year partnership between AWI, the Australian Merino Sire Evaluation Association, nominating stud Merino breeders and site hosts.

The project aims to increase the understanding of the genetics, and economic interactions, across a diverse range of Merino types delivering high quality wool, lambs, and meat through life.

The MLP project runs at five sites where sire evaluation trials operate for the first two years and then continue to track the performance of the ewe progeny as they proceed through four to five joinings and annual shearings.

A full suite of independent visual classing and productivity traits will be assessed annually.

For further detailed explanation refer to the link below.

The tables below are part of the paper written and published by Geoff Lindon, AWI's Genetics and Animal Welfare Advocacy Program Manager.

The tables provide an explanation into the MLP sires that were chosen by a special Sire Advisory Group commissioned by AWI were completely industry relevant and representative. These sires chosen, offered both extremes and combinations on welfare and performance, that would help us to explore the drivers of lifetime productivity.

The hyperlink is: <https://merinosuperiorsires.com.au/wp-content/uploads/2020/07/COMMS-Merino-Lifetime-Productivity-Project-Sire-Selection-Process-and-Stocktake-200727.pdf>

There is good reason using this Stocktake data to say that the MLP sires are a good representation of ALL current Industry sires.

Table 9: Average ASBV Performance of MLP Sires Based on Fibre Diameter (FD) ASBV Type (April 2020)

FD ASBV*	Count	ycfw	acfw	yfd	yss	ysl	ywt	awt	yfat	yemd	ywec	ebwr	edag	nlw	DP+	MP+	FP+
SF <-2.8	12	8	5	-3.2	-1.4	-4.0	2.6	1.2	-0.4	-0.2	-11	0.8	0.08	-8%	129	144	151
F -2.7 to -1.8	33	20	19	-2.2	-0.5	2.3	4.7	3.2	-0.3	-0.1	15	0.2	-0.03	0%	162	167	158
FM -1.7 to -0.8	47	23	21	-1.2	0.6	5.2	5.9	4.6	-0.5	-0.3	22	0.0	0.05	-1%	155	160	147
M -0.7 to +0.3	34	24	20	-0.3	2.2	10.1	7.4	6.2	0.2	0.6	-2	-0.2	-0.04	1%	164	159	143
S > +0.4	8	26	20	0.8	3.2	15.5	7.9	6.9	0.7	1.4	3	-0.7	-0.04	1%	159	147	126
Total	134	21	19	-1.3	0.7	5.5	5.8	4.5	-0.2	0.1	9	0.0	0.00	-1%	157	159	148

*SF=Superfine, F=Fine, FM=Fine Medium, M=Medium, S=Strong

Table 9 sorts the sires on micron (FD). It shows that low wrinkle is easier in high diameter sheep, harder in fine and super fines

The impact of stronger SA Merinos using English Longwools over Peppins in 1880-1900's to get frame, open faces, lower breech wrinkle etc for pastoral country remains with us.

The Merino is still a mix of "strains" / "types" despite AI since 1982 and now has less focus on bloodlines or families.

Table 10: Average ASBV Performance of MLP Sires Based on Early Breech Wrinkle (EBWR) ASBV (April, 2020)

EBWR ASBV	Count	ycfw	acfw	yfd	yss	ysl	ywt	awt	yfat	yemd	ywec	ebwr	edag	nlw	DP+	MP+	FP+
< -0.7	17	19	12	-0.1	0.5	18.0	7.9	6.6	1.0	1.6	-7	-1.1	-0.07	5%	160	146	129
-0.6 to -0.1	43	20	17	-1.2	1.1	7.4	7.2	6.0	0.2	0.6	-1	-0.3	-0.06	2%	163	160	147
0 to +0.3	28	27	24	-1.2	1.0	6.1	6.3	5.0	-0.5	-0.2	25	0.1	0.01	0%	164	169	152
+0.4 to +0.7	28	22	21	-1.8	1.0	-0.1	4.3	3.0	-0.6	-0.7	14	0.5	0.01	-2%	154	165	155
>0.8	18	16	18	-2.2	-0.7	-2.9	2.0	0.5	-1.0	-0.8	19	1.0	0.22	-10%	131	149	148
Total	134	21	19	-1.3	0.7	5.5	5.8	4.5	-0.2	0.1	9	0.0	0.00	-1%	157	159	148

Table 10 is sorting the sires on wrinkle. It points to low wrinkle sheep, being down in fleece weight acfw -12% (24-12) but less so today compared to 15 years ago (estimate 20% lower fleece weights using wether trial data), as breeders have tried to breed low wrinkle sheep with higher fleece weight in recent years.

It will take a lot more time for breeders to close the gap on wrinkle v productivity and then more time again to breed for low dag and productivity, especially again in the fine and superfine types.

You will note from the evidence-based scientific paper above, to cease mulesing by 2022 is not realistic from an animal welfare prospective. This evidence-based paper has been produced, representing the whole of the sheep industry of approximately 68 million sheep across Australia, not just a selected group of breeders that transitioned from a very plain base.

RECOMMENDATION

NSW SMBA strongly opposes the banning of the mulesing practice

Breeding for non-mulesed sheep is possible, and well underway. It will take a long time for this to be conceivable without affecting the animal's welfare in the process. Mulesing at this stage is the best animal welfare practice to prevent flystrike on a sheep for its entire life. It is performed once in a sheep's life, quickly, and with analgesic or anaesthetic.

NSW SMBA supports the use of analgesic or anaesthetic but does not support mandatory policy for any sheep procedures.

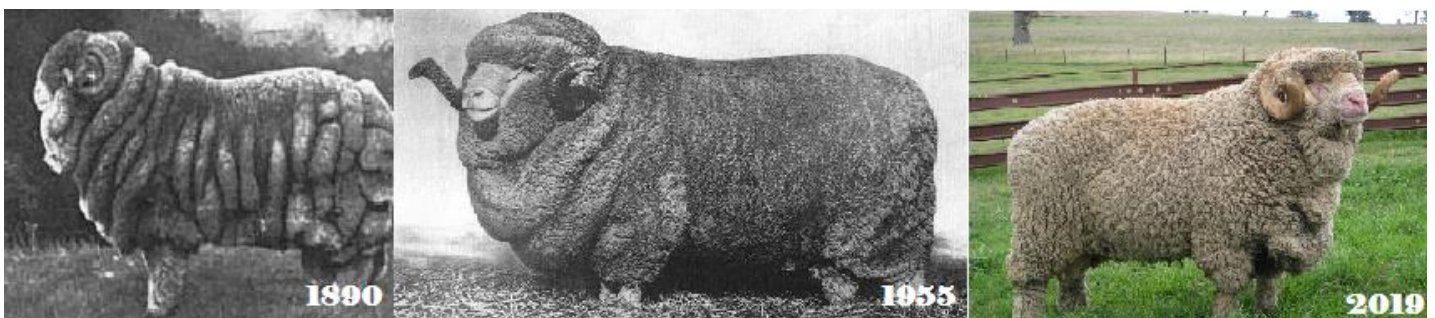
Research

Industry continues to heavily invest in research to reduce the reliance on mulesing and promotion of the use of A & A. Ram breeders are collecting breech trait data to genetically reduce the requirement to mules. This process takes time and is far from feasible within the timeframe set out in the Bill especially for the fine and superfine end of merinos as demonstrated in the examples above.

A virtual reference genomic flock should commence as soon as possible, to include the already thousands of records from the CSIRO's breech strike genetics flocks (in WA and in Armidale NSW), individual stud records, and the last few years of the MLP data.

"Breech flystrike is a costly trait to measure. Australian Wool Innovation's investment into genetic solutions for breech flystrike has resulted in the availability of estimated breeding values for indicator traits, such as breech wrinkle, breech cover and dag through SheepGenetics to enable genetic and permanent improvement in breech flystrike through selection. However, because selection is still based on indicator traits rather than breech flystrike itself, genetic gains are not at their maximum yet."

"Within the next five years, a much larger dispersed reference population could be built that increases the accuracy of genomic breeding values to a level that allows accurate selection directly on breech flystrike resistance and fast-track genetic improvement for this trait." Dr Sonja Dominik
AWI PROJECT NO: ON-00515 GENOTYPING OF BREECH FLYSTRIKE RESOURCE FLOCK published 17/6/2020



Education, Encouragement and Training

Wider engagement with producers to ensure animal welfare best practice including the use of A & A is essential. It would be more prudent to educate and promote animal welfare best practice. Mandating or prohibiting a procedure would not increase the benefits to the animal.

Encouragement of all woolgrowers to arrive at 100% adoption of the National Wool Declaration would provide a true and correct analysis of the usage of analgesic and/or anaesthetic. This could be audited by the industries NWD integrity program (NWD-IP).

CONCLUSION

Australian ram breeders, and commercial woolgrowers are professionals in the industry. As an industry the health and welfare of their animals is paramount, they are their life, and their livelihood.

Evidence shows that the use of analgesic or anaesthetic in NSW is higher than the national average. With wider producer engagement to increase full adoption of the National Wool Declaration the exact representation would be much higher, without any policy of mandating.

There is currently no alternative to protecting these sheep from likely suffering or death throughout their lifetime, without the mulesing procedure, in the near future.

Drew Chapman
President

Hamish McLaren
Senior Vice President

CONTACT INFORMATION

Contact Details

Drew Chapman - President

Hamish McLaren – Senior Vice President

C/- Megan Giannini – Executive Officer

References and supporting papers

Supporting Letters included with this Submission

1. Australian Association of Stud Merino Breeders
2. Stud Merino Breeders Association of Western Australia (inc)

Modelling of breech strike risk and protective efficacy of mulesing in adult Merino sheep

Animal Production Science 60(8) 1051-1060 <https://doi.org/10.1071/AN18488>

Submitted: 7 August 2018 Accepted: 14 October 2019 Published: 13 February 2020. B. J. Horton A B G, R. Corkrey A C, J. Smith D, J. Greeff E and L. J. E. Karlsson

AWI Project ON 524 Final Project report by Dr Forbes Brien

<https://www.wool.com/globalassets/wool/sheep/research-publications/welfare/flystrike-research-update/project-report-rate-of-genetic-gain-in-reducing-breech-flystrike-update-june-2019>

MLP – Merino Lifetime Productivity Project

https://www.wool.com/globalassets/wool/sheep/genetics/merino-lifetime-productivity/mlp_brochure.pdf

<https://merinosuperiorsires.com.au/wp-content/uploads/2020/07/COMMS-Merino-Lifetime-Productivity-Project-Sire-Selection-Process-and-Stocktake-200727.pdf>

THE AUSTRALIAN ASSOCIATION OF STUD MERINO BREEDERS LIMITED

ABN 51 003 352 930



Correspondence:
Post Office Box 72
Williamstown Vic 3016
Tel: 0417 561 983
Email: office@merinos.com.au
Website: www.merinos.com.au

31 July 2020

Hon. Mark Banasiak
Chair
Portfolio Committee No. 4
Legislative Council
Parliament of New South Wales
Macquarie Street
SYDNEY NSW 2000

**RE: Letter of Support for the NSW Stud Merino Breeders Association Submission -
Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019**

The Australian Association of Stud Merino Breeders (AASMB) fully endorse the position taken by the NSW Stud Merino Breeders Association (NSW SMBA) against the proposed Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019.

AASMB are the peak Merino organisation representing the six state Stud Merino Associations (New South Wales, Western Australia, South Australia, Victoria, Tasmania and Queensland) and through these Associations, some 900 studs in Australia. These studs provide genetics and other services to the Sheep and Wool Industry throughout Australia and Internationally. Australian Merino sheep are the core of the Wool Industry.

Although this Bill has been submitted to the NSW Parliament, the proposed amendments will impact the Industry Australia wide. Therefore, as well as providing this letter of support for the NSW SMBA submission, AASMB have also provided a separate submission against this Bill.

Yours faithfully

Peter Meyer
President

28th July 2020

Hon. Mark Banasiak
Committee Chair
Legislative Council
Parliament of New South Wales
Macquarie Street
SYDNEY NSW 2000

RE: Submission - Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019

The Stud Merino Breeders' Association of WA (SMBAWA) is an association which represents a membership of 215 merino stud breeders in WA. These stud breeders are also involved in running large scale commercial sheep production operations. Included in our association's objectives is to be involved in matters affecting the viability of the merino sheep industry. Each state has their own merino stud breeding association which then fall under the umbrella of an Australian Association. As such we support other states on issues affecting their state sheep industry's viability, especially as many of these issues eventually flow through in some way to impact the industry nationwide.

In line with this, the SMBAWA seeks to endorse the position taken by the NSW Stud Merino Breeders Association **against** the proposed Bill; Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019, which aims to ban mulesing.

Our peak wool research body, the Australian Wool Innovation (AWI) is heavily invested in research for alternatives to mulesing and until such times as solutions are found that can be broadly adopted across the whole of industry on a nationwide basis, mulesing is still the most successful method of controlling breech flystrike for the lifespan of the merino sheep.

As part of good husbandry practices the SMBAWA supports and promotes the use of analgesics or anaesthetics at mulesing. From an animal welfare standpoint the practise of mulesing done in conjunction with analgesics or anaesthetics delivers the best animal welfare outcomes.

In a 2017 AWI survey of 1,200 Merino breeders across Australia showed that 83% of Merino lambs mulesed received analgesics and/or anaesthetics, which demonstrates that producers are voluntarily adopting this practise. Since then the uptake in the use of these products by sheep producers has increased.

If this Bill is to succeed the animal welfare of sheep will not improve, the risk of flystrike will increase and the health of the sheep will be impacted and in many cases to the point of death.

Your sincerely

Scott Pickering
(President)