

Submission  
No 32

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

**Organisation:** National Farmers Federation

**Date Received:** 7 August 2020

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7 August 2020

The Hon. Mark Banasiak MLC  
Chair  
Portfolio Committee No. 4 – Industry  
Parliament House  
Macquarie St  
SYDNEY NSW 2000

Via email: [portfoliocommittee4@parliament.nsw.gov.au](mailto:portfoliocommittee4@parliament.nsw.gov.au)

Dear Mr Banasiak,

**RE: Inquiry into the Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019**

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Portfolio Committee No. 4 – Industry inquiry into the Prevention of Cruelty to Animals Amendment (Restrictions on Stock Animal Procedures) Bill 2019 (the bill).

The NFF was established in 1979 as the national peak body representing farmers and the agriculture sector more broadly, across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain, including live export. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF and its members are committed to continuous improvement in animal welfare, and to working in partnership with governments to ensure best practice animal welfare outcomes that meet the expectations of the community. Animal welfare is a fundamental part of farming, and livestock producers understand the responsibility they have for the animals in their care. Good animal welfare also makes business sense.

Livestock industries are responsible for managing animal welfare and promoting and driving continuous improvement in welfare outcomes on farm and through the supply chain. The NFF supports the Australian Animal Welfare Standards and Guidelines as the mechanism for setting minimum welfare standards in Australian agriculture. The standards and guidelines are science-based and are developed and revised through a consultative process, with input from across governments, industry, researchers, animal welfare organisations and the community. The



agreed standards are intended to be adopted by all state and territory governments within their legislative frameworks. New South Wales is one of two states to have adopted the agreed standards. The guidelines provide for a higher standard of welfare and serve the development of industry-based assurance programs. The NFF believes the standards and guidelines are the best process through which to drive continuous improvement in livestock welfare.

The bill does not recognise the established standards and guidelines process, and proposes to ban mulesing in NSW by 1 January 2022, and to mandate the use of pain relief for a range of livestock husbandry procedures. The NFF does not support these provisions, for the reasons outlined below.

#### The NFF opposes the banning of mulesing in NSW

Mulesing is an effective once-for-life procedure that offers lifetime protection against breech flystrike. Mulesing is undertaken with the long-term welfare of sheep in mind, and remains the most effective method available for controlling breech flystrike. A mulesing ban would lead to poorer animal welfare outcomes for millions of sheep through increased incidences of flystrike, as unmulesed sheep are more susceptible to the condition<sup>1</sup>.

The NFF's animal welfare policy<sup>2</sup> includes a commitment from industry to continue to pursue best practice for all husbandry procedures and where practical adopt alternatives for aversive practices as they become available. The long-term goal of the Australian wool industry is to find a viable alternative method to surgical mulesing, however until a suitable alternative is developed mulesing must be retained, using appropriate pain relief. The NFF strongly believe that the decision on whether to mules should remain with the producer.

The NFF offers its support for the submissions provided by NFF member organisations NSW Farmers Association and WoolProducers Australia, which outline in detail why it is essential to maintain access to mulesing, what industry is doing to promote the use of pain relief for mulesing, and why the proposal to ban mulesing as outlined in the bill is unviable.

#### The NFF opposes provisions to mandate pain relief for certain husbandry procedures

The NFF supports the appropriate use of pain relief in livestock production systems, but is opposed to the provisions in the bill that would mandate the use of pain relief for earmarking, ear-tagging or branding any livestock; castrating pigs,

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<sup>1</sup><https://www.publish.csiro.au/AN/AN18488?jid=ANv60n8&xhtml=0E6C0DD1-9A22-443C-8C4C-2D94C272E4C9>

<sup>2</sup>[https://nff.org.au/wp-content/uploads/2020/05/FINAL-NFF-animal-welfare-policy-statement\\_May-2020-.pdf](https://nff.org.au/wp-content/uploads/2020/05/FINAL-NFF-animal-welfare-policy-statement_May-2020-.pdf)



cattle, sheep or goats; dehorning or de-budding cattle or goats; tailing sheep; and mulesing.

The use of pain relief is already widespread in Australia's livestock industries, where it is routinely used for a number of procedures. Livestock industries have taken proactive steps to educate producers on the benefits of using pain relief, and to promote its use as industry best practice. For example, the Australian Beef Sustainability Framework sets an aspiration of 100% uptake of pain relief for unavoidable procedures by 2030. In the wool industry, the use of pain relief has increased steadily since the first pain relief product – Tri-Solfen – was registered for use in livestock in 2008. WoolProducers Australia and NSW Farmers both have formal policy positions supporting the implementation of mandatory pain relief for mulesing, through an industry-led approach. This is a proactive response that recognises the importance of responding to community concerns and market signals while also maintaining access to the practice of mulesing until a viable alternative is developed.

Submissions to this inquiry from NFF member organisations NSW Farmers Association, Australian Pork Limited, Cattle Council of Australia, Sheep Producers Australia and WoolProducers Australia outline in detail why mandating the use of pain relief products for husbandry procedures other than mulesing cannot be supported – or implemented – by industry. The NFF supports these submissions and refers the committee to the reasoning that they put forward. A blanket requirement that mandates the use of pain relief for a wide range of husbandry practices is a blunt instrument that fails to recognise the complexity and practicalities of livestock production systems, the relatively limited availability of approved pain relief products, the potential for adverse welfare outcomes and the potential implications for management of food safety and market access residue requirements.

#### Closing remarks

Continuous improvement in animal welfare – including through the use of best practice husbandry – is informed by ongoing research, development, extension and adoption (RDE&A). Industry has invested millions of levy dollars into RDE&A to improve welfare outcomes, and it is vital that these industry-driven investments and government co-contributions continue into the future. The NFF strongly supports the advancement of animal welfare RDE&A – including research that seeks viable alternatives to husbandry practices or identifies pain relief products that are safe, effective and practical for use in Australian production systems.

Community expectations are continually evolving, and the community – and our trading partners – increasingly have an interest in what happens on farm and through the supply chain. It is the responsibility of industry to engage with the Australian community and to develop ways of demonstrating its integrity. This



needs to be backed by a practical, unbiased, science-based and consultative system for setting national minimum welfare standards and a commitment from governments to adopt those standards in a nationally consistent manner.

Thank you for the opportunity to provide a submission to this inquiry. Should you require any further information, please contact Adrienne Ryan, General Manager Rural Affairs, on [redacted] or [redacted].

Yours sincerely,

**TONY MAHAR**  
Chief Executive Officer